



AGENDA
CITY COUNCIL OF THE CITY OF MORENO VALLEY
MORENO VALLEY COMMUNITY SERVICES DISTRICT
CITY AS SUCCESSOR AGENCY FOR THE
COMMUNITY REDEVELOPMENT AGENCY OF
THE CITY OF MORENO VALLEY
MORENO VALLEY HOUSING AUTHORITY
BOARD OF LIBRARY TRUSTEES

July 15, 2015

SPECIAL MEETING – 6:00 PM

City Council Study Sessions

First & Third Tuesdays of each month – 6:00 p.m.

City Council Meetings

Special Presentations – 5:30 P.M.

Second & Fourth Tuesdays of each month – 6:00 p.m.

City Council Closed Session

Will be scheduled as needed at 4:30 p.m.

City Hall Council Chamber - 14177 Frederick Street

Upon request, this agenda will be made available in appropriate alternative formats to persons with disabilities, in compliance with the Americans with Disabilities Act of 1990. Any person with a disability who requires a modification or accommodation in order to participate in a meeting should direct such request to Guy Pegan, ADA Coordinator, at 951.413.3120 at least 48 hours before the meeting. The 48-hour notification will enable the City to make reasonable arrangements to ensure accessibility to this meeting.

Dr. Yxstian A. Gutierrez, Mayor Pro Tem
Jeffrey J. Giba, Council Member

Jesse L. Molina, Mayor

George E. Price, Council Member
D. LaDonna Jempson, Council Member

AGENDA
CITY COUNCIL OF THE CITY OF MORENO VALLEY
July 15, 2015

CALL TO ORDER - 6:00 PM

PLEDGE OF ALLEGIANCE

INVOCATION

Lt. David Cain - The Salvation Army Moreno Valley Corp

ROLL CALL

INTRODUCTIONS

A. PUBLIC HEARINGS

Questions or comments from the public on a Public Hearing matter on this Special Meeting agenda are limited to three minutes per individual and must pertain to the subject under consideration. All remarks and questions shall be addressed to the presiding officer or to the City Council. Those wishing to speak should complete and submit a LAVENDER speaker slip to the Bailiff.

- A.1. WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A CHANGE OF ZONE, WORLD LOGISTICS CENTER SPECIFIC PLAN, A PRE-ZONING/ANNEXATION, TENTATIVE PARCEL MAP NO. 36457, AND A DEVELOPMENT AGREEMENT FOR A 3,818 ACRE PROJECT AREA IN THE EASTERN PORTION OF THE CITY (Report of: Community Development)

Recommendations: That the City Council:

1. **ADOPT** Resolution No. 2015-56. A Resolution of the City Council of the City of Moreno Valley California, Certifying the Final Environmental Impact Report (P12-016), and Adopting the Findings and Statement of Overriding Considerations and Approval of the Mitigation Monitoring Program for the World Logistics Center Project.
2. **ADOPT** Resolution No. 2015-57. A Resolution of the City Council of the City of Moreno Valley California Approving PA12-0010 (General Plan Amendments) for the Proposed World Logistics Center Project to include Land Use Changes for Property Within the World Logistics Center Specific Plan Area to Business Park/Light Industrial (BP) and Open Space (OS) and Properties outside of the World Logistics Center Specific Plan to Open Space (OS) and Corresponding General Plan Element Goals and Objectives Text and Map Amendments to the Community Development, Circulation, Parks, Recreation and Open Space, Safety and Conservation Elements

3. **INTRODUCE** Ordinance No. 900. An Ordinance of the City of Moreno Valley, California, Approving PA12-0012 (Change of Zone), PA12-0013 (Specific Plan) and PA 12-0014 (Pre-Zoning/Annexation), which would include the Proposed World Logistics Center (WLC) Specific Plan, A Full Repeal of the Moreno Highlands Specific Plan No. 212-1, Pre-Zoning/Annexation for 85 acres at the Northwest Corner of Gilman Springs Road and Alessandro Boulevard, Change of Zone to Logistics Development (LD) and Light Logistics (LL) and Open Space (OS) for Areas within the Proposed World Logistics Center Specific Plan Boundary, and a Change of Zone to Open Space (OS) for those Project Areas Outside and Southerly of the Proposed World Logistics Center Specific Plan Boundary
4. **ADOPT** Resolution No. 2015-58. A Resolution of the City Council of the City of Moreno Valley, California Approving PA12-0015 (Tentative Parcel Map No. 36457) For the Purposes of Establishing Twenty-Six (26) Parcels for Financing and Conveyance Purposes, Including an 85 Acre Parcel of Land currently located in the County of Riverside and adjacent to Gilman Springs Road and Alessandro Boulevard into the City of Moreno Valley and included in the World Logistics Center Specific Plan.
5. **INTRODUCE** Ordinance No. 901. An Ordinance of the City Council of the City Of Moreno Valley, California, Approving PA12-0011 (Development Agreement) for the World Logistics Center Project covering that Real Estate which Highland Fairview has a Legal or Equitable Interest In, on Approximately 2,263 Acres within the World Logistics Center Specific Plan Area (2,610 Acres), generally located east of Redlands Boulevard, south of State Route 60, west of Gilman Springs Road and north of the San Jacinto Wildlife Area
6. **ADOPT** Resolution No. 2015-59. A Resolution of the City Council of the City of Moreno Valley, California Requesting the Riverside Local Agency Formation Commission to initiate proceedings for the expansion of the City boundary for an approximate 85 acres of land located along Gilman Springs Road and Alessandro Boulevard (APN Nos. 422-130-002 and 422-130-003

Recommendations: That the Community Services District Board:

1. **ADOPT** Resolution No. CSD 2015-29. A Resolution of the Moreno Valley Community Services District Board of Directors of the City of Moreno Valley, California to Request the Riverside Local Formation Commission to initiate proceedings for the Expansion of the Community Services District boundary to include an approximate 85 acres of land located along Gilman Springs Road and Alessandro

Boulevard in conjunction with a related Annexation (APN Nos. 422-130-002 and 422-130-003)

ADJOURNMENT

CERTIFICATION

I, Jane Halstead, City Clerk of the City of Moreno Valley, California, certify that the City Council Agenda was posted in the following places pursuant to City of Moreno Valley Resolution No. 2007-40:

City Hall, City of Moreno Valley
14177 Frederick Street

Moreno Valley Library
25480 Alessandro Boulevard

Moreno Valley Senior/Community Center
25075 Fir Avenue

Jane Halstead, CMC,
City Clerk

Date Posted:



Report to City Council

TO: Mayor and City Council

FROM: Allen Brock, Community Development Director

AGENDA DATE: July 15, 2015

TITLE: WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A CHANGE OF ZONE, WORLD LOGISTICS CENTER SPECIFIC PLAN, A PRE-ZONING/ANNEXATION, TENTATIVE PARCEL MAP NO. 36457, AND A DEVELOPMENT AGREEMENT FOR A 3,818 ACRE PROJECT AREA IN THE EASTERN PORTION OF THE CITY

RECOMMENDED ACTION

Recommendations: That the City Council:

1. **ADOPT** Resolution No. 2015-56. A Resolution of the City Council of the City of Moreno Valley California, Certifying the Final Environmental Impact Report (P12-016), and Adopting the Findings and Statement of Overriding Considerations and Approval of the Mitigation Monitoring Program for the World Logistics Center Project.
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Highlands Specific Plan No. 212-1, Pre-Zoning/Annexation for 85 acres at the Northwest Corner of Gilman Springs Road and Alessandro Boulevard, Change of Zone to Logistics Development (LD) and Light Logistics (LL) and Open Space (OS) for Areas within the Proposed World Logistics Center Specific Plan Boundary, and a Change of Zone to Open Space (OS) for those Project Areas Outside and Southerly of the Proposed World Logistics Center Specific Plan Boundary

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6. **ADOPT** Resolution No. 2015-59. A Resolution of the City Council of the City of Moreno Valley, California Requesting the Riverside Local Agency Formation Commission to initiate proceedings for the expansion of the City boundary for an approximate 85 acres of land located along Gilman Springs Road and Alessandro Boulevard (APN Nos. 422-130-002 and 422-130-003)

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SUMMARY

The World Logistics Center encompasses a project area of approximately 3,818 acres in the eastern portion of the City. The project area is generally bound by State Route 60 on the north, Gilman Springs Road on the east, the San Jacinto Wildlife Area on the south and Redlands Boulevard on the west (Attachments 17 and 18). The project proposes to convert the land use and zoning potential for the area from a variety of

residential, commercial, industrial business park, mixed-use and open space land uses to a predominantly industrial and open space based land use mix. Specifically, the industrial focused Specific Plan would allow for subsequent development of up to 40,600,000 square feet of warehousing and distribution centers to complement anticipated market growth in logistics and goods movement demand. In addition to the proposed industrial land use, the project would result in a significant consolidation of Open Space zoning in the southwestern portion of the Specific Plan area and in the southern portion of the overall project area adjacent to the San Jacinto Wildlife Area. This consolidation would be consistent with the intended land use purpose envisioned in the current General Plan.

The project applications submitted by the project applicant Highland Fairview include: 1) General Plan Amendment, 2) Specific Plan and corresponding zoning atlas changes for approximately 2,610 acres of the total project area, 3) Pre-zoning of an 85-acre parcel within the proposed Specific Plan area that is identified for future annexation to the City of Moreno Valley, 4) A Tentative Parcel Map for financing and conveyance purposes only, 5) A Development Agreement for approximately 2,263 acres of the approximate 2,610 acre proposed Specific Plan, 6) Zoning atlas modifications for approximately 1,104 acres within the overall project area but outside of the proposed Specific Plan area for Open Space, while 104 acres is estimated for off-site improvement areas, and 7) Environmental Impact Report, prepared for the overall project.

The Planning Commission, at their June 30, 2015 meeting, recommended approval of the World Logistics Center Project by the City Council on a 6-1 vote.

DISCUSSION

The proposed World Logistics Center (WLC) project would establish clear City vision and development regulations for a significant portion of the eastern area of the City. The project area is primarily vacant today with seven existing developed rural residential properties. The development regulations currently in place for much of the project area are codified as the Moreno Highlands Specific Plan (MHSP), which was adopted April 17, 1992. Over the past twenty-three years, notwithstanding the MHSP being in place, the area has experienced nearly non-existent growth or development.

The proposed WLC project area encompasses approximately 3,818 acres in the eastern part of the City. The 2,610 acre WLC Specific Plan area is included within the overall project area. The Specific Plan establishes development framework for up to 40,600,000 square feet of industrial, logistics, high cube, warehouse and distribution center land uses and related "logistics support" uses. A 74.3 acre parcel located in the southwest corner of the Specific Plan area is proposed as Open Space. Project areas outside and south of the Specific Plan boundaries make up approximately 1,104 acres and are designated as Open Space zoning. Another 104 acres within the project area will accommodate offsite improvements. The project area is generally bound by State Route 60 on the north, Gilman Springs Road on the east, the San Jacinto Wildlife Area on the south and Redlands Boulevard on the west.

Exhibit 2-1 of the Specific Plan shows the proposed Land Use Plan. As described on Exhibit 2-1, up to 40,400,000 square feet of high-cube warehouse (i.e. larger than 500,000 square foot buildings) logistics uses and “logistic support” uses (e.g. fueling, convenience retail) are proposed in the planning areas designated for “Logistics Development” (LD) zoning. Up to 200,000 square feet of smaller warehouse (i.e. less than 500,000 square foot buildings) are proposed in areas designated for “Light Logistics” (LL) zoning (Attachment 19). Allowance is provided in the Specific Plan for associated office and accessory uses to be conducted within the warehouse logistics uses. As described in the Specific Plan, logistics uses include facilities intended for storage, assembly and processing of manufactured goods and materials prior to their distribution to other facilities.

The project area and development intensity described in the Draft Environmental Impact Report, which was circulated for public review in early 2013, have since both been reduced. The project area was reduced by approximately 100 acres and the development intensity of the project was reduced by one million square feet.

The applicant has provided documents confirming it holds legal or equitable interest in approximately 2,263 acres within the 2,610 acre Specific Plan area, which was reviewed by special legal counsel. The remainder of the project area is owned by sixteen private entities, the Metropolitan Water District, San Diego Gas & Electric Company, Southern California Gas Company, and California Department of Fish and Game (Attachment 20).

The applicant’s proposal is consistent with the Economic Development Action Plan adopted by the City Council in 2011, and updated in 2013. These Council-approved documents recognize opportunities to support the emerging logistics industry in the eastern portion of the City and the economic development potential of logistics development in the area of the proposed World Logistics Center. As cited by Highland Fairview, a February 2012 letter from the City Manager indicates that “the City has developed and is now implementing an aggressive economic development strategy which identified logistics as a prime area of focus and opportunity for development in the eastern portion of the city” and references “the City’s intent to consider comprehensive General Plan and zoning amendments for the Moreno Highlands area to facilitate the development of logistics uses” (Attachment 21). This direction was subsequently supported by City Council action at a public meeting held on May 22, 2012 (Attachment 22).

The following summarizes discretionary entitlement applications requested with the project, including a description, staff analysis and staff and Planning Commission recommendations with each:

General Plan Amendment (PA12-0010)

Description

The applicant is requesting amendments to the Community Development Element, Parks, Recreation and Open Space Element, Conservation Element, Safety Element, and Circulation Element of the City General Plan that collectively will set forth policy goals, and exhibits that allow for Open Space (OS) and Business Park/Light Industrial (BP/LI) land uses to occur in the project area, and which can facilitate development of the applicant's desired industrial logistics warehouse and distribution centers (Attachment 4).

Text and map modification to General Plan Elements include amendment of the Community Development Element related to modification of land uses, Parks, Recreation and Open Space Element for modification of existing multi-use trail configurations, open space and future parkland acquisition areas, Conservation Element to modify the Major Scenic Resources Map, Safety Element to modify noise contours and Fire Station Map, Circulation Element to change General Plan Street designations and roadway configurations, and General Plan Goals and Objectives to include a revised Circulation Plan, level of service (LOS) standards and Bikeway Plan Map.

Analysis

The proposed General Plan Land Use Amendment would modify land use designations from the current general plan land use designations of business park, single-family residential, multiple family residential, commercial/retail, public facilities, and open space to Business Park/Light Industrial (BP/LI) and Open Space (OS). The proposed General Plan land use amendments would be consistent with the zoning established in the WLC Specific Plan which would allow industrial related land uses and related office, ancillary and logistics support uses. Land use change to Open Space (OS) is proposed for areas outside and to the south of the WLC Specific Plan which include California Department of Fish and Wildlife, San Diego Gas and Electric and the Southern California Gas Company properties.

The General Plan land use amendment to Business Park/Light Industrial would constitute a significant policy change for the eastern portion of Moreno Valley. The variety of land uses currently shown in the General Plan for this area of the city allow for business park/industrial, single and multiple-family residential, commercial/retail, mixed use, public and open space land uses. The land use change to Business Park/Light Industrial coupled with the proposed Specific Plan regulations would result in two principal land uses: industrial warehouse distribution centers and open space. The proposed land use changes that will reduce residential zoning potential are consistent with assumptions in the earlier 2011 Housing Element update, as well as the current Housing Element adopted on February 12, 2014. The reduction in housing units is consistent with a shift toward industrial zoning strategies and goals outlined in the City's 2011 and 2013 Economic Development Action Plans. A significant driver for the proposed land use change is to expand job producing land uses in the eastern portion of Moreno Valley. The General Plan Amendment is expected to facilitate improvement in the existing low jobs to high housing imbalance. The shift in land use creates opportunity for a better positive ratio in overall future City revenue to cost figures; given

residential land uses typically create a higher demand and cost for city services compared with non-residential industrial uses. The project and its potential for job creation, as envisioned, could substantially benefit the established, but currently under performing, commercial/retail developments located west of the project area. The project may provide momentum, need and interest for future office and hospitality land use development in other areas of the City.

The proposed Open Space land use changes would provide consistency and compatibility with the existing Open Space land use and established wildlife habitat areas. The project area proposed as Open Space, south of the southern edge of the proposed new Specific Plan area, is consistent with policy assumptions and text added to the General Plan when it was last updated in 2006. Those assumptions and text changes were provided in recognition of the acquisition of over 1,000 acres in that area by the California Department of Fish & Wildlife and the Sempra energy company with the intended purpose to maintain them as open area.

Recommendation:

Staff and the Planning Commission recommend approval of the proposed modifications to General Plan text and maps to the City Council.

Change of Zone (PA12-0012)

Description

The proposed Change of Zone application submitted for the World Logistics Center (WLC) Specific Plan (2,610 acres) and areas outside and south of the WLC Specific Plan boundary (1,208 acres) will replace zoning predominantly for land currently within the Moreno Highlands Specific Plan, as well as some properties in the project area that are not included in the Moreno Highlands Specific Plan. The proposal will change land use residentially zoned RA2 (96 acres), R3 (133 acres), R5 (60 acres), and R5/R10 (9 acres) and land use established within a Planned Residential Community that included Residential Development (1,359 acres), Golf Course and Open Space (702 acres), Neighborhood Commercial (10 acres), Cemetery (16.5 acres) and Public (348 acres) and a Planned Business Center that included Business Park (361 acres), Mixed Use (80.5 acres), Community Commercial (16 acres), Open Space (78 acres) and Public Facilities (67 acres). The newly proposed zoning within the Specific Plan boundaries, which would allow for primarily industrial warehouse and ancillary uses, would be consistent with proposed land uses established within the proposed WLC Specific Plan. Proposed modifications in land use and zoning are consistent with the proposed General Plan land use amendments and allow for a small variety of industrial related land uses including high cube logistics warehouse uses, ancillary office uses, self-storage and vehicle storage uses. The Open Space or OS zone, which includes a 74.3 acre area in the southwestern portion of the Specific Plan, would remain as open space.

Analysis

The Change of Zone (PA12-0012) request proposes to establish Logistics Development (LD), Light Logistics (LL), and Open Space (OS) zoning designations for a proposed warehouse/logistics master planned project on an approximately 2,610 acre portion of land within the WLC Specific Plan. Zoning proposed within the Change of Zone application would be consistent with that which is proposed within the Specific Plan for the project. Specific zones would include Logistics Development or LD proposed for approximately 2,384 acres allowing for high cube warehouse uses to include buildings with a minimum square footage of 500,000 square feet. Ancillary office uses would also be a permitted land use within the category. Logistics support uses to include motor fuel sales and related retail sales when operated in connection with a primary fuel operation use are also permitted within the zone. The Light Logistics or LL zone, which is included as part of an approximate 37 acres of the Specific Plan, would allow for warehouses buildings and related ancillary uses less than 500,000 square feet with no minimum square footage requirement. A 74.3 acre site in the southwestern portion of the Specific Plan is proposed as Open Space (OS).

The proposal will also include zoning modifications outside the WLC Specific Plan Area that was originally included within the Moreno Highlands Specific Plan (MHSP). This will include a zone change to Open Space (OS) for areas to the south of the WLC Specific Plan which includes primarily the 910 acre California Department of Fish and Wildlife (CDFG) land that is provided for habitat use and the 174 acre San Diego Gas and Electric properties which are primarily used as an open space noise attenuation buffer area around their property. The 20 acres of land owned by SDG&E and the Southern California Gas Company currently used for natural gas facilities is zoned for Public Utility use and is not a part of the WLC Specific Plan or a component of the request to modify zoning outside of the WLC Specific Plan boundary. Permitted uses under the OS zone would include agricultural uses, animal raising, police stations, museums, wholesale and distribution plant nurseries, and parks, while conditionally permitted uses would include equestrian centers, day care centers, golf courses, open air theaters, and public utility stations/yards.

As a result of the proposed project, the 3,038 acre Moreno Highlands Specific Plan will be repealed and replaced with the WLC Specific Plan and proposed Open Space (OS) land use and zoning designations south of the WLC Specific Plan boundary. A remnant 16.5 acre parcel included in the Moreno Highlands Specific Plan located north and east of Gilman Springs Road is not included in the WLC Specific Plan or in an area included within the overall project area. Land use designation of Open Space (OS) would remain if the WLC project is approved. The remnant 16.5 acre parcel of land leftover from the proposed repeal of the Moreno Highlands Specific Plan will establish consisting zoning with the General Plan Open Space designation, and staff will present this consistency modification at a later date. Pursuant to Government Code Section, 65860c, "in the event that a zoning ordinance becomes inconsistent with a general plan by reason of amendment to the plan, or to any element of the plan, the zoning ordinance shall be amended within a reasonable time so that it is consistent with the General Plan as amended."

Recommendation:

Staff and the Planning Commission recommend approval of the proposed Change of Zone to the City Council.

Specific Plan (PA12-0013)

Description

The proposed Specific Plan will serve as the regulatory framework and implementation tool for future development within the Specific Plan area. The Specific Plan document includes development standards, list of allowable land uses, building and landscape guidelines; on and off-site design standards, infrastructure requirements, maintenance regulations, and other pertinent regulations to ensure a sustainable high quality enclave of the City. Government Code Section 65450 establishes that a Planning Agency may prepare a specific plan for the systematic implementation of the General Plan for all or a part of the area in the City covered by the General Plan. The City Municipal Code, Title 9, will serve as the regulatory framework for the portions of the overall project area not included in the Specific Plan boundary.

Specifically, the proposed World Logistics Center (WLC) Specific Plan is a master plan for the development of up to 40.6 million square feet of high-cube logistics warehouse distribution facilities and related ancillary uses. The proposed project includes a 2,610 acre Specific Plan to implement future development and establish comprehensive land use regulations governing the proposed project, including zoning, project infrastructure, location of public improvements such as a required fire station, permitted uses and development standards in each of the zones (primarily industrial warehouse uses), building architecture (including building form/massing and façade treatments), street configurations (including roundabout locations), landscape guidelines, multi-use trail configurations and project phasing.

Analysis

The Specific Plan establishes sixteen (16) separate planning areas for future development. Exhibit 2-1 in the Specific Plan document serves as the land use plan (Attachment 19). The Exhibit shows the sixteen planning areas numbered as 1-12, 20-22, and 30. The Exhibit contains further details with regard to size of each planning area, land use category for each planning area, and anticipated square foot of building development for each planning area. As plot plans for industrial development have not been submitted at this time, the Plan will act as an implementation tool that will provide development standards and allow for future build out of fifteen (15) of the planning areas within the Specific Plan boundary area. The sixteenth planning area is designated for Open Space purposes. It is anticipated that development of the project would occur over time in the form of multiple separate independent projects of varying sizes and configurations. Each of these future projects would be required to be consistent with the General Plan and zoning and would comply with all applicable regulations of the Specific Plan.

The Specific Plan identifies the type and intensity of land uses permitted within the project. For example, the Logistics Development or “LD” land use district will allow for larger high cube logistics warehouse buildings (500,000 square feet or greater) with ancillary office uses as well as facilities for vehicle and container storage, cellular transmission facilities, construction yards, a motor fuel facility and public utility uses. The Light Logistics Support or “LL” category allows for such uses as smaller high cube logistics warehouse buildings (500,000 square feet or less), self-storage uses, vehicle and container storage, construction yards within or immediately adjacent to construction sites, cellular transmission facilities and public utility uses. Proposed Open Space or OS zoned areas will be designated for the 74.3 acre parcel located in the southern area of the WLC Specific Plan site as well as parcels outside and south of the WLC Specific Plan boundary down and adjacent to the San Jacinto Wildlife area. All uses and development within the OS designation areas shall comply with the standards, guidelines, and procedures set forth Section 9.06.030 of the City Municipal Code.

In order to provide greater compatibility between current residential land uses that are included west of the project site and proposed industrial land uses, the applicant has proposed a buffer area considered as a 250 foot edge treatment area that will be established to create buffers between the project site and adjacent existing land uses. Two distinct buffer or edge treatment areas occurring within the project site, include the Redlands/Bay/Merwin/Street D edge located on the north portion of the project site adjacent to existing residential properties located west of the Specific Plan boundary near Redlands Boulevard, and the San Jacinto Wildlife area edge located outside and south of the WLC Specific Plan boundary area. The San Jacinto Wildlife area edge is located on the southern portion of the project site currently adjacent to designated wildlife areas. This area will include a restricted use area of at least 250 feet from state owned property. In addition to the 250 foot restricted area, additional setback will be provided such that all buildings are a minimum of 400 feet from the San Jacinto Wildlife Area.

A phasing plan is included within the Specific Plan. Project phasing and development within the Specific Plan is expected to occur in two large phases, starting in the western portion of the site south of Eucalyptus Avenue and progress easterly and southerly. The phasing concept is based on beginning construction where infrastructure presently exists and expanding to the south and east. The first phase will include development primarily in the western portion of the Specific Plan, with final phases of development on the eastern portion of the project. As analyzed in the environmental document, it is anticipated that the first phase of development would be completed by the year 2022, and could achieve 50% of the entire project or approximately 20,300,000 square feet of logistics warehouse development. The second phase is anticipated to be completed by 2030 and include the remaining 50% of the project or 20,300,000 square feet of warehouse development. The projected time lines were based on the project starting development in 2015, and the actual build out years provided could fluctuate dependent upon various conditions. The actual timing of development will be dependent upon numerous factors, including interest by building users, private developers and local, regional, and economic conditions. A Development Agreement, which is discussed in more detail later in this report, has also been requested by the applicant as a means to

secure long term vesting of the approvals. The Development Agreement contains provisions that are intended to motivate timely development of the project, along with negotiated public benefits that would apply with, and some without, progress in physical development.

In securing a new specific plan for the WLC project, the existing Moreno Highlands Specific Plan would be repealed. The Moreno Highlands Specific Plan includes 3,038 acres and was approved for approximately 7,763 residential dwelling units and approximately 603 acres of Business Park, retail, residential, open space, and public/institutional land uses. A Development agreement for the Moreno Highlands Specific Plan expired on September 12, 2012.

Recommendation:

Staff and the Planning Commission recommend approval of the proposed World Logistics Center Specific Plan and repeal of the existing Moreno Highlands Specific Plan to the City Council.

Pre Zoning/Annexation (PA12-0014)

Description

The WLC Specific Plan Area includes a triangular shaped 85 acre area of land (made up of two separate parcels) west of Gilman Springs and north of Alessandro Boulevard that is currently within the County of Riverside jurisdiction. The area is within the City of Moreno Valley Sphere of Influence, and the applicant has demonstrated that they hold a legal or equitable interest in the property. A pre-zoning/annexation application has been submitted by the applicant to incorporate the two parcels of land into the City of Moreno Valley. This project proposes to pre-zone the property as Logistics Development (LD) within the proposed Specific Plan, and it is anticipated that the zoning would carry forward with the intended subsequent annexation.

Analysis

The project includes completion of the annexation process for an approximate 85-acre area located on the north side of Alessandro Boulevard at Gilman Springs Road within the County of Riverside. The first step has already been provided to make this parcel part of the City, as the parcel has been included in the City's Sphere of Influence since 1985. The proposed WLC project furthers the annexation with General Plan land use designations and pre-zoning for this parcel, with the intent to incorporate the property into the World Logistics Center Specific Plan. The proposed annexation follows a logical path of City property located on the west side of Gilman Springs Road.

The annexation of additional land in the City's sphere will require review and approval by the Riverside County's Local Agency Formation Commission (LAFCO). The current review of the area to be annexed and approval of the tentative map would establish "pre-zoning" of the area in advance of the final annexation action by LAFCO. The

proposed annexation is reviewed by the agency once the environmental analysis has been certified and the project is approved by the City and an application is submitted.

Recommendation:

Staff and the Planning Commission recommend to the City Council approval of the proposed Pre-zoning of the identified 85 acres, consistent with zoning described in the WLC Specific Plan, for future annexation of the property into the City of Moreno Valley.

Tentative Parcel Map (PA12-0015)

Description

Tentative Parcel Map No. 36457 proposes the subdivision of a portion of the project site into separate large parcels for financing and conveyance purposes. The tentative parcel map identifies twenty-six (26) parcels within the World Logistics Specific Plan area. This map does not create any development rights for the subdivided properties. Subsequent subdivision applications will be required to be processed, approved and recorded prior to the development of any future buildings on the properties within the WLC Specific Plan area. The tentative map along with the pre-zoning/annexation application will also serve as the mechanism for including the resulting 85 acre parcel, within the proposed map, which is currently within the County of Riverside jurisdiction, to be subsequently annexed into the project site and the City of Moreno Valley.

Analysis

The proposed map is for financing and conveyance purposes only and does not create any development rights for the subdivided properties. Upon consideration of the map by the Planning Commission, it was noted that the numbering of the General Notes needed some minor correction and the Commission requested that Condition P8 in the corresponding Resolution for the map be clarified to ensure that only Parcel 26 and not all of the WLC Specific Plan project area was subject to future annexation, These corrections have been made in the materials presented with this staff report.

Recommendation:

Staff and the Planning Commission recommend approval of proposed Tentative Parcel Map No. 36457 to the City Council.

Development Agreement (PA12-0011)

Description

The applicant has requested a Development Agreement (DA) as part of the World Logistics Center (WLC) Specific Plan. The following are general considerations noted with regard to a DA:

- A DA is a negotiation entitlement tool used to lock in (“vest”), for an extended/specified period of time, the underlying approved land use entitlements along with parameters for certain development regulations, fees, processing procedures, and policies, etc. that would be applied to subsequent development approvals in implementing the project and improvements which, in the absence of the DA, would be subject to periodic changes outside of the control of the parties.
- Authority/Approval – Per City Municipal Code Section 9.02.110(D)(2) a DA requires review through the Planning Commission with final action by the City Council. The Development Agreement is not a "required" approval for the World Logistics Center project. The General Plan Amendments, Zone Change, Specific Plan, Parcel Map, and pre-zoning for the 85 acre future annexation parcel can all be approved without an accompanying or subsequent Development Agreement. Approval of the DA is simply contingent upon mutual agreement of the parties entering into the agreement.
- In exchange for longer vested rights to the developer, through a DA the City seeks public benefits above and beyond any required developer obligations. The public benefits are not subject to a nexus finding and do not have to be directly associated with the development project.

The proposed DA has been vetted through multiple negotiation sessions between the applicant’s team and City negotiation team. Both teams included legal representatives and used appropriate technical and fiscal expertise as warranted to perform a thoughtful, comprehensive assessment of the elements structured in the DA. The recommended Agreement represents the collective interests of both parties to provide for the future timely and efficient development of the project. As the applicant does not own all parcels within the proposed 2,610 acre WLC Specific Plan project area, only those properties that the applicant has demonstrated a legal or equitable interest in (2,263 acres) within the boundaries of the WLC Specific Plan area are subject to the DA.

For a DA the City Council has the approval authority to evaluate and determine whether or not the anticipated public benefits of the project coupled with the additional public benefits established in the DA are a fair exchange in allowing for the longer term vested development rights for the applicant. In negotiating the DA, it was noted that the WLC project presents a unique opportunity to expand the City’s property and sales tax, generate construction employment and new permanent employment opportunities for Moreno Valley residents, and thereby improve the present jobs and housing imbalance that exists in the City.

Analysis

The following are key provisions in the DA:

Term: The DA would be up to a 25-year agreement. The initial Term would be for fifteen (15) years, and provisions are included for a ten (10) year extension. Specifically, Section 3.5 of the DA states that the Term will not be extended for the additional 10 years unless within the first 15 years at least 8,000,000 square feet of occupied development is achieved and a payment of \$1,000,000 is made to the City, or 12,000,000 square feet of occupied development is achieved, in which case no additional payment would be due to the City. If less than 8 million square feet is achieved, the DA would terminate at the end of the 15th year.

Development Impact Fees ("DIF"): The developer will be obligated to participate in the City DIF programs included in Section 1.5 of the DA. The definition includes the current DIF categories in the City's current Municipal Code; traffic and fire DIF are excluded in lieu of other DA provisions that ensure developer commitments to traffic and fire station infrastructure. Section 4.7.1 of the DA includes language to ensure any future increases to DIF will be applied at the time of development.

Payments and Reimbursements: Payments and reimbursements for infrastructure, including any oversized and/or accelerated infrastructure put in place by the developer, will be processed in accordance with the current provisions of Section 9.14 of the City Municipal Code. This is addressed in Section 4.8 of the DA. No unique or specialized provisions for reimbursement are included within the DA that is not typically available to other development projects.

Fire Station and Equipment: Highland Fairview shall, at its own cost, provide a fully constructed, fully equipped "turnkey" fire station and fire station site, including fire equipment, as specified by the City's Fire Chief. The fire station's furniture and fixtures shall be reasonably comparable to those of the most recently completed fire station within the City. The fire station, equipment and trucks shall be provided as and when directed by the Fire Chief. This is included in Section 4.9 of the DA.

SR-60 Enhancements: Highland Fairview will contribute up to \$500,000 to be used to develop landscape, signage, and bridge architectural guidelines for SR-60 between Redlands Parkway and Gilman Springs Road, based on a 10:1 match of City funds budgeted for the same. This is included in Section 4.13 of the DA. It is noted that this provision will require allocation up to \$50,000 of City funds in order to gain the full developer contribution.

Force Majeure: Force majeure provisions in the DA were expanded to cover economic or environmental/physical conditions (such as lack of utilities) that could arise and be beyond Highland Fairview's control which would make development uneconomic or infeasible. If any such events shall occur, the Term of the DA shall be extended for the duration of each such event, provided that the Term shall not be extended under any circumstances for more than three (3) years regardless of the number or length of individual extensions. This is included in Section 11.9 of the DA.

Local Hiring and Education, Library, Training and Workforce Development Funding: Highland Fairview will participate in the new City Council approved Hire MoVal Incentive Program. In addition, to ensure residents of Moreno Valley are provided education resources and obtain every opportunity to secure the jobs which will be created by the operation of the World Logistics Center, Highland Fairview will contribute up to \$6,993,000 towards education and training programs tied to the logistics industry. The funds related to these provisions will begin to flow in to the City immediately with an initial \$100,000 payment, and subsequent \$100,000 annual payments for the next 6 years. At year seven the annual payments increase to \$125,000 through build out. One million dollars (\$1,000,000) is to be contributed by Highland Fairview at the issuance of the first building permit for a logistics building on the Subject Property and \$0.11/square foot to be paid at the time of the issuance of the building permit for each succeeding building, excluding the fire station. The provisions are included in Sections 4.11 and 4.12 of the DA.

Air Filtration:

In the version of the DA presented to the Planning Commission, Highland Fairview and city staff had reached agreement that Highland Fairview would provide air filtration improvement at three (3) of the existing residences in the project area. Upon discussion of this provision in the DA the Planning Commission requested a modification to increase this commitment of Highland Fairview to cover all seven (7) existing homes. During the course of the discussion with the Planning Commission, Highland Fairview agreed to the requested change. Therefore, Article 4, Section 4.14, of the DA presented for City Council consideration includes the provision for air filtration systems for all seven (7) rural residential homes within the boundaries of the World Logistics Center Specific Plan. The revised Development Agreement is included as an attachment to this report (Attachment 11).

Public Benefits: Exhibit No. A-3 was included in the DA to clearly identify the full list of Public Benefits that will result with approval of the DA.

Recommendation:

Staff and the Planning Commission recommend approval of the proposed Development Agreement to the City Council.

Environmental Impact Report (P12-016)

Description

Based on scope of the project, a Program Environmental Impact Report (EIR) was prepared. Due to the large project size and expansive land area, proposed phasing of the project and limited information known about future development of industrial

buildings, a programmatic EIR rather than a project EIR has been prepared. Allowances within the CEQA Guidelines will allow subsequent development project environmental review to tier off of this program level document when those subsequent development proposals are submitted.

Analysis

The City has adhered to the California Environmental Quality Act (CEQA) Guidelines in the environmental review of this project. Notice of completion and availability for public review of the draft environmental impact report (DEIR) document was circulated on February 5, 2013 with the comment period ending on April 8, 2013. This offered more than a 60-day review period, which exceeded the 45 day review period required by CEQA for a DEIR. In fact, the City accepted comments well past the 60-day review period for the project and those comments have been considered and included with the Final EIR.

The DEIR document was sent to numerous state and local agencies, adjacent property owners and other interested parties. Staff received approximately 144 comment letters and over 1,000 individual comments in relation to the public review period of the draft document. Subsequent to Draft Environmental Impact Report process and public comments, the project area has been reduced by approximately 100 acres and 1 million square feet.

All interested parties and responsible agencies had the opportunity to review responses to comments in the Final EIR that was mailed May 1, 2015 to all parties providing comment letters and other interested parties. This posting and circulation was 41 days in advance of this public hearing by the Planning Commission. The 41 days far exceeds the 10 day review period required by CEQA Guidelines. As was the case with the Draft EIR, the Final EIR in its final form was also provided for the public's review at City Hall, the public library and electronically on the City's website.

In briefly summarizing the key points of the document, analysis presented in the Draft EIR indicates that the proposed project will have certain significant environmental impacts to, Aesthetics, Air Quality, Land Use, Noise, and Traffic/Circulation as described in detail in both the Draft EIR and Final EIR that cannot be reduced to less than significant levels even with proposed mitigation in place. As identified in the document, cumulative impacts for the noted items above are considered to be significant and unavoidable for these five items. The EIR presented mitigation measures, which, to the extent feasible, will reduce project-specific and cumulative impacts for each of these items; however in some instances this did not reduce impacts below significant thresholds. All other environmental effects evaluated in the Draft EIR have been determined to be less-than-significant, or can be successfully mitigated below significant thresholds. All mitigation measures are included in the Mitigation Monitoring and Reporting Program established by the Environmental Impact Report (Attachment 3).

As presented, the five (5) environmental impacts of aesthetics, air quality, land use, noise and traffic/circulation evaluated in the DEIR and FEIR remain significant and

unavoidable and a cumulative impact even with mitigation measures provided. For aesthetics, Mitigation Measures (MM) 4.1.6.1 A through D have been included that provide plans prior to project development for maintaining a 250 foot setback area measured from the city zoning boundary line to any building or truck parking area, the inclusion of visual plans demonstrating screening of the project from existing residents and MM 4.1.6.2, 4.1.6.3 and 4.1.6.4 which include view protection of Mount Russell and light and glare restrictions/analysis of proposed solar panels for any future development. Mitigation measures for air quality include MM 4.3.6.2A through 4.3.6.2D, 4.3.6.3A, through 4.3.6.3E, and 4.3.6.4A which include measures such as the required inclusion of Tier 4 construction equipment, restriction of trucks that fall below 2010 engine emissions standards from entering project areas and limitation of truck idling to three (3) minutes all in an effort to reduce air pollutant emissions. For Noise, mitigation measures have been added for short-term construction noise levels as provided in MM 4.12.6.1 A through J to include the requirement of a Noise Reduction Compliance Plan, restrictions on grading during nighttime hours, potential sound barriers, as well as measures for long term traffic and operation noise to include MM 4.12.6.2A through 4.12.6.4A for the requirement of building specific noise studies, the potential for sound walls and maintenance of buffer areas. The WLC Specific Plan also has been designed to direct truck traffic away from residential areas. Traffic/circulation measures include MM 4.15.7.4A through 4.15.7.4G which includes a traffic impact analysis, dedication of right of way consistent with the Subdivision Map Act for frontage street improvements and payment of Transportation Uniform Mitigation (TUMF) fees. Land use/Planning remains a significant and unavoidable project impact with no feasible mitigation measures available in regards to future development affecting seven single-family residential homes and the fact that the WLC Specific Plan cannot accommodate these residences within logistics warehousing areas.

Alternatives to the proposed project were analyzed in the EIR to include:

- **No Project/No Development** – Site would be void from development and remain in dry farming with some rural residential uses
- **No Project/Existing General Plan Alternative** - Includes land uses currently included on the City's General Plan (i.e. Moreno Highlands Specific Plan land uses).
- **Alternative 1: Reduced Density** – Site would include development of approximately 29 million square feet of logistics warehousing uses on the 2,610 acre WLC Specific Plan site.
- **Alternative 2 Mixed Use A Alternative** - Would result in 1,410 acres or 22 million square feet designated for logistics warehousing, 1,000 acres or 20 million square feet of light manufacturing, assembly or business park, 50 acres or 500,000 square feet of retail commercial, 100 acres or 1 million square feet of professional/medical offices and 150 acres of open space.
- **Alternative 3 Mixed Use B alternative** - Would be similar to the no project/existing General Plan Alternative, but with 10 million square feet of logistics warehousing on the 603 acres proposed for business, retail, institutional and other uses under the Moreno Highland Specific Plan.

Alternative sites for the project were also evaluated in the EIR. Due to the size and nature of the project, no feasible alternative sites were found in any of the eleven (11) jurisdictions evaluated. From the analysis of the five project alternatives, the environmentally superior alternative was Alternative 1 (Reduced Density), which is the only alternative that reduces traffic, air quality and related impacts by reducing the total square footage of warehousing by 30 percent. As stated in the EIR document, it was determined that Alternative 1 does not achieve the objectives to the degree of the proposed project and particularly does not meet most of the major project goals primarily because the project's industrial square footage is reduced by 30 percent.

Although impacts to aesthetics, air quality, land use, noise, and traffic/circulation cannot be reduced to less than significant levels, CEQA allows for a Statement of Overriding Considerations and findings to be prepared and considered. CEQA requires the decision making agency to balance the economic, legal, social, technological or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the proposed project. This would include project benefits such as the potential creation of jobs, reduction of the jobs housing imbalance, increase in City revenue or other project benefiting aspects including the furthering of General Plan goals and objectives that can be weighed against project environmental impacts that cannot be mitigated to less than significant levels. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable" as allowed for under CEQA. The Statement of Overriding Consideration and corresponding findings are attached to the report as Attachment 3 for review and consideration.

Recommendation

With all required mitigation measures included in the Mitigation Monitoring and Reporting Program, and with inclusion of the Statement of Overriding Considerations which weighs benefits of the project against the potential project environmental impacts, certification of the EIR by the City Council is recommended by staff and the Planning Commission.

KEY PROJECT CONSIDERATIONS

The following is a discussion of the project area and how the proposed Specific Plan has been developed in a considerate fashion in light of the opportunities and constraints presented by the project environs, with both local and regional focus.

Site

The project area is predominately vacant, undeveloped, and marginal agricultural land. There are seven occupied residential single-family homes with associated ranch/farm buildings in various locations in the project area, but are not all contiguous properties. Established single-family development and subdivisions are located west of the project area just west of Merwin Street and south of Bay, and along the west side of Redlands Boulevard between Bay Street and Dracaea. The Skechers high-cube warehouse

facility is located west of Theodore and north of Eucalyptus immediately outside of the project area.

The 3,038-acre Moreno Highlands Specific Plan (MHSP) is currently in place and constitutes the land use and development regulations for the majority of the project area. Land use and development regulations for those properties within the project area but outside of the MHSP are established in Title 9 of the City Municipal Code. The MHSP is a master planned, mixed-use community concept consisting of up to 7,763 residential dwelling units on approximately 2,435 acres and approximately 603 acres of business, retail/commercial, institutional, and other uses. Development within the specific plan area has been essentially non-existent since the Specific Plan was approved in 1992. The development agreement approved with the MHSP expired in 2012.

Surrounding Area

Surrounding developed industrial properties in the vicinity of the proposed project include the 1.8 million square foot Skechers and 800,430 square foot Aldi warehousing logistics and distribution centers located south of State Route 60, west of Theodore Street and west of Redlands Boulevard respectively. Several residential neighborhoods have developed along Redlands Boulevard to the west and south of the western boundary of the proposed WLC Specific Plan. An area of the City known as “Old Moreno” is situated near the southwest portion of the project site, around the intersection of Redlands and Alessandro Boulevards. The major roadways that provide access to the project area are SR-60 to the north, Redlands Boulevard to the west, Alessandro Boulevard which traverses the site east-west, Gilman Springs Road to the east, and Theodore Street which traverses the site north-south. Redlands Boulevard and Theodore Street are north-south arterial roadways that intersect with SR-60. The Moreno Valley Ranch residential community and Golf Club is located approximately one mile southwest of the project area.

Limited development has occurred adjacent to the eastern and southern boundaries of the project, which include the “Badlands” to the east and the San Jacinto Wildlife Area to the south. Gilman Springs Road serves as the eastern City boundary and areas on the east side of the road are within the City’s sphere of influence. There are approximately ten (10) large custom single-family homes in the area east of Gilman Springs Road near the project site. The Badlands Sanitary Landfill, operated by the County of Riverside Waste Management Department, is located approximately 1.5 miles northeast of the project area.

Immediately south of the proposed project is the San Jacinto Wildlife Area (SJWA), Mystic Lake, and the Lake Perris State Recreation Area. These lands are state-owned and access is restricted. The SJWA is owned and operated by the California Department of Fish and Game (CDFG) and contains approximately 20,000 acres of restored wetland and ponds. The Lake Perris State Recreation Area is owned and

operated by the California State Parks Department and contains approximately 6,000 acres of open space land, which is used both for recreation and preservation.

The closest large-scale commercial/retail developments are located south of State Route 60 at Moreno Beach Drive, approximately 1.25 miles to the west of the proposed project, and south of State Route 60 at Nason, approximately 1.5 miles to the west of the proposed project area. These shopping complexes include the Moreno Valley Auto Center, Walmart, Target and the Stonegate Center along with a variety of restaurants and ancillary commercial and service uses.

Access/Parking

The revised General Plan Circulation Element and the Specific Plan's Circulation Plan provide a framework for the movement of vehicles in and around the World Logistics Center project area. The Specific Plan document provides details on the road/street designations, right-of-way design, and road improvement thresholds. Access and parking for future developments on the individual parcels would be reviewed and approved against these regulations under their respective separate plot plan reviews.

Access to the World Logistics Center Specific Plan area is expected to be through the Theodore Street/SR-60 interchange, Eucalyptus Avenue (between Redlands Boulevard and Theodore Street), Gilman Springs Road at Alessandro Boulevard, and through the proposed extension of Alessandro to Cactus Avenue. Within the Specific Plan area the circulation system is essentially a loop system off of the Theodore Street backbone. The interior arterials will connect through three roundabouts to control traffic flow. The circulation system is intended to direct truck traffic access to Theodore Street from Highway 60 and to a lesser degree Alessandro from Gilman Springs Road. The interior street network is also expected to accommodate bus access, pedestrian infrastructure and bicycle infrastructure.

Due to the anticipated truck traffic within the proposed Specific Plan, the Master Plan multi-use trails have been laid out to avoid the interior loop roads by routing from Redlands Boulevard around Eucalyptus, Street B, Street F, Alessandro Boulevard, to Cactus and back to Redlands Boulevard. The Plan proposes a trail connection around the Old Moreno neighborhood along Bay Avenue and Merwin Street. The proposed Cactus Avenue trail would continue east at the base of the hills to connect to Davis Street and the San Jacinto Wildlife Area.

As included in the WLC Specific Plan, all future truck loading and parking areas for individual buildings and uses will be screened from public view and buffered by walls and dense landscape areas. In addition, vines shall be placed near walls along all designated truck loading/parking areas.

Design/Landscaping

Site design and architecture guidelines are included within the WLC Specific Plan and would be applicable to individual projects and plot plans submitted for subsequent development review and permitting. The design standards provide for compatible

contemporary and sustainable designs that minimize resource and energy consumption. The Specific Plan establishes building height limitations throughout the project as described on Exhibit 5-3 Building Height Plan of the Specific Plan, with limits of 60 feet in areas designated as Area A and limits of 80 feet in Area B.

All buildings in the World Logistics Center that are 500,000 square feet or greater shall be designed to meet or exceed LEED Certified Building Standards. Building design under LEED would assist in reducing energy consumption by incorporating sustainable design features to further reduce the project's environmental footprint such as the inclusion of recycled building materials and the use of roof-mounted solar systems.

The Specific Plan includes landscape design standards for the project site that will ensure reduced consumption of water compared to conventional landscaping concepts. These regulations will meet goals of the Moreno Valley drought tolerant landscape ordinance. The Specific Plan contains an extensive palette of drought tolerant plants and requires individual development projects to install this drought tolerant landscaping and to utilize onsite runoff to irrigate landscaped areas. The Specific Plan calls for a substantial landscape treatment along the project area western boundary to provide an aesthetic buffer between the existing and future residential development and the planned warehouse buildings and truck activity areas. For areas not located along the western boundary, landscaped areas would be grouped by water needs and only utilize drip irrigation systems along Theodore and the perimeter of the project. The future design of the project will direct runoff to landscaped areas and employ techniques to promote percolation and water capture.

As part of the master plan design Section 4.2.4 of the Specific Plan identifies Special Edge Treatment Areas and Design Criteria. A 250 foot landscape edge treatment area will be established along the west and southwest portions of the project adjacent to existing and planned residential land uses. An additional setback is included in the southwestern portion of the area and along Gilman Springs Road. Land use restrictions within these areas would exclude items such as buildings, truck loading areas, truck circulation areas or truck/trailer storage uses. Items such as employee/visitor parking, emergency access and property maintenance for hardscape and landscape areas would be allowed in the buffer area. The San Jacinto Wildlife area edge is located on the southern portion of the project site currently adjacent to wildlife uses and will include an additional setback in addition to the 250 foot buffer area between the conservation area and buildings so that the minimum distance will be 400 feet.

Infrastructure Improvements

Development within the Specific Plan will require various infrastructure improvements. Local roadways and intersections necessitate by and/or impacted by project traffic will be constructed and/or improved. Electrical service would need to be extended from the Moreno Beach substation to the project area. Electric power lines along Gilman Springs Road would be relocated when that road is widened. Providing potable water to the site will require the construction of three new reservoirs, one north of SR-60 off of Theodore Street, one east of Gilman Springs Road near the northeast corner of the site, and one west of the project site off of Cottonwood Avenue. Gas and sewer lines will also be

extended to the project site. The existing County drainage channel near the southwest corner of the site will be improved to handle increased flows from project runoff.

Advisory Body Recommendation

The Planning Commission conducted a public hearing for the project that extended over multiple days including June 11th, June 25th and June 30th of 2015. A total of 74 speakers spoke at the three public meetings, with 37 in support of the project, 33 opposed and 4 with no expressed position on the proposed project. Those in support noted perceived quality of the project concept, the significant investment made by the developer, potential for the project to generate employment and job growth, and other economic revenue and benefits to the City including contribution to education and training. Those in opposition argued principally that the project would create unacceptable traffic, air quality and health risks and questioned the environmental analysis in these regard, and they raised concern with a predominance of warehousing land use and concern with the applicant's ability to carry out the project.

At the June 30, 2015 meeting, the Planning Commission by a vote of 6 to 1 recommended approval of the project to City Council. Over the three days of meetings, the Commission considered the detailed staff report, a comprehensive staff presentation, the presentation by the project applicant, public comments all covering the primary components of the project including the Environmental Impact Report, General Plan Amendment, Change of Zone, Pre-Zoning/Annexation, Specific Plan, Tentative Parcel Map No. 36457, and the Development Agreement.

In addition, over 100 comment letters and e-mails were provided to the Planning Commission from outside agencies, Moreno Valley residents, interested groups and entities, and other general public from outside of Moreno Valley. These comments were received by the City after the release of the Final Environmental Impact Report on May 1, 2015 up until the date of the Commission meetings. The written comments generally focused on those same areas of project benefits and project concerns expressed by the public speakers during the hearing as noted above. Additional written correspondences continue to be submitted for City Council consideration. All written correspondence received to date are attached hereto as Attachments 25 and 26 for review by the City Council. Given the late submittals, all of the comments will continue to be considered by staff and technical experts, as warranted, up through the date of the City Council hearing and staff will be prepared to address City Council questions, if any.

It is noted that while all of the new comments received are being considered by the City Council, there is no requirement that written responses to each be provided either with respect to the environmental procedures established in CEQA, or per public hearing procedures. With regard to CEQA, Section 21092.5(c) of the CEQA guidelines specifically states:

“Nothing in this section requires the lead agency to respond to comments not received within the comment periods specified in this division, to reopen comment periods, or to delay acting on a negative declaration or environmental impact report.”

And Section 15204(a) includes:

“CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.”

The established public comment period for review of the DEIR for the WLC project was between February 5, 2013 and April 8, 2013. All letters and correspondence received during that 60 day review were considered in accordance with CEQA and detailed responses to comments were included in the Final Environmental Impact Report currently before the City Council.

Notwithstanding the above, the project environmental consultant team, under staff's review and direction, during the course of the Planning Commission consideration performed analysis and prepared responses to many of the comments received for further staff's consideration. Collective responses were prepared for those similar comments raised in letters and the various e-mails, and some individual responses to agency and interest group comments such as the California Air Resources Board (CARB), City of Riverside, Inland Empire Waterkeepers and the Riverside County Transportation Commission (RCTC) were assembled and available for staff use as necessary to respond to Planning Commission questions.

At the conclusion of their deliberations, in the motion to recommend approval of the Project to the City Council, the Planning Commission modified three (3) items:

1) Tentative Parcel Map Condition of Approval P8 was modified to provide clarification that prior to the recordation of Parcel 26 of the map, only that property shall need to be annexed into the City and that the annexation of Parcel 26 property does not hold up recordation of any other property; and

2) Mitigation Monitoring Program and Mitigation Measure 4.3.6.3B was modified to expand the revocation provision for CUP “Conditional Use Permit” under the Sanctions for Non-Compliance with to include “any related entitlement”, and

3) Development Agreement Article 4, Section 4.14 was modified to require Highland Fairview to include air filtration systems for all seven (7) rural residential homes included within the World Logistics Center Specific Plan boundary.

All changes requested by the Planning Commission are included in the related attachments.

As explained in the responses to the various comments received that are included as Attachment 27 of the staff report, staff's determination during consideration of the project by the Planning Commission was that the FEIR as prepared is consistent with the requirements of CEQA and no evidence presented in the volume of new agency and/or public comments triggered the requirements for recirculation of the DEIR as outlined in Section 15088.5 of the CEQA Guidelines.

Further, in consideration of those comments provided requesting that the project be conditioned to require zero emission trucks, such zero-emission on-road heavy-duty trucks are not widely commercially available, nor can it be determined when such zero emissions trucks would be widely commercially available, and it was not possible to identify other warehouse/industrial/logistics projects that have been saddled with such a requirement. The mitigation measures for air quality imposed on the project include restriction of use of trucks falling below 2010 engine emission standards from entering project areas, off-road diesel powered construction equipment to be Tier 4, limitation of truck idling to three (3) minutes, are more stringent than current industry practices.

ALTERNATIVES

1. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment, Development Agreement, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map.
2. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map, but without a Development Agreement.
3. Deny the World Logistics Center project.
4. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment, Development Agreement, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map, with any modifications specified by the City Council.

FISCAL IMPACT

Entitlement processing costs for the project have been entirely borne by the project applicant through establishment of development deposit accounts. The proposed general plan and zoning changes from the existing Moreno Highlands Specific Plan to the World Logistic Center Plan is expected to result in a positive economic impact to the City given non-residential land uses typically have more positive revenue to cost impact ratio given less demand for public services. Approval of the Development Agreement includes positive economic interests to the City.

NOTIFICATION

All responsible agencies, interested parties and property owners of record within at least 300 foot radius of the project area were provided a notice of the City Council public hearing. The public hearing notice for this project was posted on the project site in

seven (7) separate prominent locations and the hearing notice was published in the local newspaper on July 5, 2015.

PREPARATION OF STAFF REPORT

Prepared By:
Mark Gross
Senior Planner

Department Head Approval:
Richard J. Sandzimier
Planning Official

Concurred By:
Allen Brock
Community Development Director

CITY COUNCIL GOALS

None

ATTACHMENTS

1. CC Notice with Map
2. Proposed Resolution_ EIR
3. Exhibits A and B to Proposed Resolution_ EIR
4. Proposed Resolution_ GPA
5. Exhibits A - M Proposed Resolution_ GPA
6. Proposed Ordinance_ SP Pre-Zoning
7. Exhibits A, B, C to Proposed Ordinance_ Change of Zone
8. Proposed Resolution_ Tentative Parcel Map
9. Exhibits A, B to Proposed Resolution_ Tentative Parcel Map
10. Proposed Ordinance_ Development Agreement
11. Exhibit A to Proposed Ordinance_ Development Agreement
12. Proposed Resolution_ Annexation
13. Exhibit A to Proposed Resolution_ Annexation
14. Proposed Resolution_ CSD
15. Exhibit A to Proposed Resolution_ CSD
16. WLC Environmental Impact Report
17. Project Location Map
18. Aerial Map
19. Exhibit 2.1 Land Use Plan of proposed World Logistics Center Specific Plan
20. Highland Fairview Property Ownership Map
21. Letter to Iddo Benzeevi from City Manager Garcia, dated February 2012
22. CC Report dated 5-8-12 (Cty Council meeting date May 22, 2012)
23. PC Staff Report 06 11 15 without attachments
24. PC Staff Report dated 06 25 15 without attachments
25. PC Public Comments (combined)

- 26. CC Public Comments (combined)
- 27. Responses to Public Comments (combined)

APPROVALS

Budget Officer Approval	<u>✓ Approved</u>	7/09/15 4:40 PM
City Attorney Approval	<u>✓ Approved</u>	7/09/15 6:41 PM
City Manager Approval	<u>✓ Approved</u>	7/09/15 7:44 PM

CITY OF MORENO VALLEY
CITY COUNCIL
NOTICE OF SPECIAL PUBLIC HEARING AND
ENVIRONMENTAL DETERMINATION

NOTICE IS HEREBY GIVEN that a Special Meeting and Public Hearing will be held by the City Council of the City of Moreno Valley on the following item:

PA12-0010 **General Plan Amendment**
PA12-0011 **Development Agreement**
PA12-0012 **Change of Zone**
PA12-0013 **Specific Plan**
PA12-0014 **Annexation/Pre-Zoning**
PA12-0015 **Tentative Parcel Map 36457**
P12-016 **Environmental Impact Report**

Applicant: Highland Fairview
Owner: Highland Fairview and various private property owners
Representative: Highland Fairview
A.P.Nos.: APN's available at City Hall, see attached map for project location
Location: East of Redlands Boulevard, south of SR60, west of Gilman Springs Road and north of the San Jacinto Wildlife Area
Proposal: The proposed World Logistics Center (WLC) project area is approximately 3,818 acres. The project includes a new 2,610 acre Specific Plan area envisioned to accommodate up to 40.6 million square feet of high cube industrial warehouse distribution development and related uses. A General Plan Amendment to Business Park/Light industrial (BP) for warehouse logistics and Open Space (OS) and various related amendments to General Plan Elements for Community Development, Parks, Recreation and Open Space, Circulation, Safety, Conservation and Land Use is also proposed. Approval of the project would result in a full repeal of the current Moreno Highlands Specific Plan No. 212-1, would provide a Change of Zone to Logistics Development (LD), Light Logistics (LL) and Open Space (OS) for areas within the proposed WLC Specific Plan boundary, and would provide a Change of Zone to Open Space (OS) for those project areas outside and southerly of the new WLC Specific Plan boundary. Eighty-five (85) acres of land at the northwest corner of Alessandro Boulevard and Gilman Springs Road is being pre-zoned and intended for a subsequent annexation to the City. The developer has also requested approval of Tentative Parcel Map No. 36457 for financing purposes only with 26 parcels identified, and the developer is seeking approval of a Development Agreement covering the properties controlled by Highland Fairview.
Council District: 3
Case Planner: Mark Gross

Environmental Determination: An Environmental Impact Report, Statement of Overriding Considerations and Mitigation Monitoring Program have been prepared for this project (SCH#2012021045). A draft document was circulated to the public for review from February 5, 2013 to April 8, 2013. The Final EIR is provided on the City's website at www.moval.org

Any person interested in the proposed project may speak at the hearing or provide written testimony at or prior to the hearing. The application file and environmental documents may be inspected at the Community Development Department at 14177 Frederick Street, Moreno Valley, California during normal business hours (7:30 a.m. to 5:30 p.m., Monday through Thursday and 7:30 a.m. to 4:30 p.m. on Friday). You may call the City Planning Division at (951) 413-3206 for further information.

Any person may appear and be heard in support or in opposition of the project or the recommended environmental determination at the time of hearing.

The City Council may consider appropriate modifications or alternative to the project or the environmental determination. If you challenge this item in court, you may be limited to raising only those issues you or someone else raised at the Public Hearing described in this notice, or in written correspondence delivered to the City Council on or before the following meeting date:

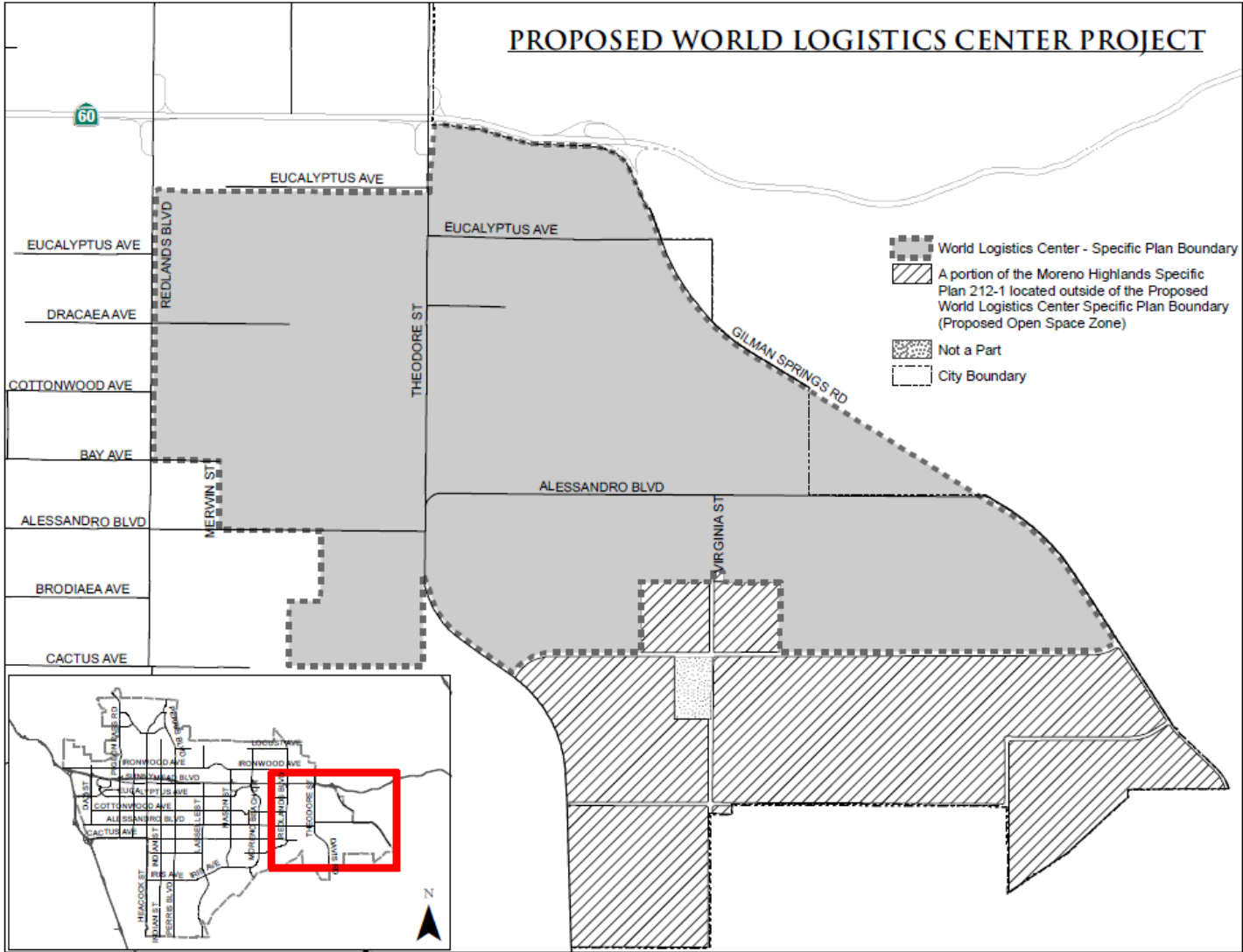
Date and Time: July 15, 2015 at 6:00 P.M.
Location: City Hall Council Chambers
14177 Frederick Street
Moreno Valley, California 92553
Planner: Mark Gross
Telephone: (951) 413-3215

/s/ Richard J. Sandzimier
Richard J. Sandzimier
Community Development Department

Press-Enterprise
Newspaper

July 5, 2015
Date of Publication

Attachment: CC Notice with Map (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A CHANGE OF



Attachment: CC Notice with Map (1570) : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A CHANGE OF

RESOLUTION NO. 2015-56

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MORENO VALLEY CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT (P12-016), ADOPTION OF THE FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS, AND APPROVAL OF THE MITIGATION MONITORING PROGRAM FOR THE WORLD LOGISTICS CENTER PROJECT

WHEREAS, on June 11, 2015, June 25, 2015 and June 30, 2015, the Planning Commission of the City of Moreno Valley held public meetings to consider the proposed project, for the 3,818 acre project area, which collectively constitute the World Logistics Center Project, inclusive of a 2,610 acre World Logistics Center Specific Plan area with a proposed build out of 40,600,000 square feet of logistics warehousing and ancillary uses, and open space uses in the eastern portion of Moreno Valley; and

WHEREAS, the World Logistics Center Project includes applications for a General Plan Amendment (PA12-0010) , a change of zone (PA12-0012), Specific Plan (PA12-0013), a Development Agreement (PA12-0014) a Pre-Zoning/Annexation (PA12-0014), and Tentative Tract Map No. 36457/Finance Map (PA12-0015). All of the discretionary applications are related but approved by separate resolutions or ordinances with individual findings, and tied to Environmental Impact Report (P11-005); and

WHEREAS, a Draft Environmental Impact Report (DEIR) was prepared for the World Logistics Center Project; and

WHEREAS, the City published a Notice of Availability of the DEIR in the local newspaper (Press Enterprise), posted the Notice of Availability at the Riverside Counter Clerk's office, and distributed copies to the State Clearinghouse, and circulated the DEIR to the public and to responsible agencies for a 60 day review period between February 5, 2013 and April 8, 2013; and

WHEREAS, , the DEIR includes a review of potential impacts associated with the implementation of the World Logistics Center Project, including, but not limited to Aesthetics, Air Quality, Land Use, Noise, and Traffic/Circulation as described in detail within the draft document. A Statement of Overriding Considerations is provided for environmental impacts related to Aesthetics, Air Quality, Land Use, Noise, and Traffic/Circulation, which cannot be reduced to less than significant levels; and

WHEREAS, inclusive of responses to comments received on the DEIR, a Final Environmental Impact Report (FEIR) was completed for this project and released for public review at least 10 days prior to consideration of the Project at public hearings by the Planning Commission and City Council. Copies of the final document were sent to prior commenters, responsible agencies, and other interested parties including those living in close proximity to the project area, and it was made available to the public at the City's offices, on the City's website and at the City's public library; and

WHEREAS, the EIR concerning the proposed World Logistics Center Project was prepared and processed in compliance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines and the City of Moreno Valley Rules and Procedures to Implement CEQA; and

WHEREAS, a Mitigation Monitoring Program has been completed and is included in the FEIR and will be used to ensure that all of the mitigation measures will be implemented, and

WHEREAS, on June 30, 2015, the Planning Commission forwarded the Final Environmental Impact Report (EIR) document, including the Statement of Overriding Findings and Mitigation Monitoring Program with a recommendation for certification to the City Council for final consideration; and

WHEREAS, the City Council of the City of Moreno Valley held a public hearing on July 15, 2015 to consider all entitlement applications for the World Logistics Center Project, including consideration of the Environmental Impact Report prepared for the Project; and

WHEREAS, all legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, the City Council of the City of Moreno Valley **DOES HEREBY RESOLVE** as follows:

1. The City Council hereby certifies that the final Environmental Impact Report (EIR) for the World Logistics Center Project on file with the Community Development Department, incorporated herein by this reference, has been completed in compliance with the California Environmental Quality Act, the City Council reviewed and considered the information contained in the final EIR and that the final EIR reflects the City's independent judgment and analysis; and
2. The City Council hereby adopts the Findings and Statement of Overriding Considerations regarding the final EIR for the World Logistics Center project, attached hereto as Exhibit A; and

2
Resolution No. 2015 -56
Date adopted: July 15, 2015

- 3. The City Council hereby approves the Mitigation Monitoring Program included with the final EIR for the proposed World Logistics Center project, attached hereto as Exhibit B.

APPROVED and ADOPTED this _____ day of July, 2015.

Mayor of the City of Moreno Valley

ATTEST:

City Clerk

APPROVED AS TO FORM:

City Attorney

3
Resolution No. 2015 -56
Date adopted: July 15, 2015

Attachment: Proposed Resolution_ EIR [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

RESOLUTION JURAT

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF MORENO VALLEY)

I, Jane Halstead, City Clerk of the City of Moreno Valley, California, do hereby certify that Resolution No. 2015-56 was duly and regularly adopted by the City Council of the City of Moreno Valley at a regular meeting thereof held on the 15 day of July, 2015 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

(Council Members, Mayor Pro Tem and Mayor)

CITY CLERK

(SEAL)

4
Resolution No. 2015 -56
Date adopted: July 15, 2015

**Facts, Findings and Statement of Overriding Considerations
Regarding the Environmental Effects and the Approval of the
World Logistics Center Specific Plan
(State Clearinghouse No. 2012021045)**

Attachment: Exhibits A and B to Proposed Resolution_EIR (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

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I. INTRODUCTION

The City Council of the City of Moreno Valley (this “Council”), in certifying the EIR for the World Logistics Center (WLC) Specific Plan authorizing the construction of up to approximately 40.4 million square feet of “high-cube logistics” warehouse distribution uses classified as Logistics Development (LD) and 200,000 square feet of warehousing-related uses classified as “Light Logistics” (LL) on 2,610 acres within the WLC Specific Plan. (the “Project”), makes the Findings described below and adopts the Statement of Overriding Considerations presented at the end of the Findings. The Environmental Impact Report (“EIR”) was prepared by the City of Moreno Valley (“City”) acting as lead agency pursuant to the California Environmental Quality Act (“CEQA”). Hereafter, unless specifically identified, the Notice of Preparation (“NOP”), Notice of Availability & Completion (“NOA/NOC”), Draft EIR (“DEIR”), Technical Studies, Final EIR containing Responses to Comments and textual revisions to the Draft EIR (“FEIR”), and the Mitigation Monitoring and Reporting Program (“MMRP”) will be referred to collectively herein as the “EIR.” These Findings are based on the entire record before this Council, including the EIR. This Council adopts the facts and analyses in the EIR, which are summarized below for convenience. The omission of some detail or aspect of the EIR does not mean that it has been rejected by this Council.

II. PROJECT SUMMARY

A. PROJECT DESCRIPTION

1. Site Location

The Project is located in “Rancho Belago,” the eastern portion of the City of Moreno Valley, in northwestern Riverside County. The Project site is immediately south of State Route 60 (SR-60), between Redlands Boulevard and Gilman Springs Road (the easterly city limit), extending to the southerly city limit. The major roads that currently provide access to the Project site are Redlands Boulevard, Theodore Street, Alessandro Boulevard, and Gilman Springs Road.

The WLC Project area is located in portions of Sections 1, 12, and 13 of Township 3 South, Range 3 West; and portions of Sections 6, 7, 8, 9, 16, 17, 18, 19, 20, and 21 of Township 3 South, Range 2 West, as depicted on the U.S. Geological Survey (USGS) 7.5-minute series Sunnymead and El Casco, California quadrangles.

2. Project Description

The Project covered by the EIR includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the

development. A General Plan Amendment, covering 3,714 acres, redesignates approximately 71 percent of the area (2,610 acres) for logistics warehousing and the remaining 29 percent (1,104 acres) for permanent open space and public facilities.

The World Logistics Center Specific Plan covers 2,610 acres of the 3,714 acres and proposes a maximum of 40.6 million square feet of “high-cube logistics” warehouse distribution uses classified as “Logistics Development” (LD) and 200,000 square feet (approximately 0.5%) of warehousing-related uses classified as “Light Logistics” (LL). The lands within the WLC Specific Plan that are designated LL are existing rural lots, some containing residential uses, that will become “legal, non-conforming uses” once the WLC Specific Plan is approved. In addition, the LD designation includes land for two special use areas; a fire station and a “logistics support” facility for vehicle fueling and sale of convenience goods (3,000 square feet is assumed for planning purposes for the “logistics support”).

The California Department of Fish and Wildlife (CDFW) Conservation Buffer Area is a 910-acre parcel owned by the State of California as part of the San Jacinto Wildlife Area (SJWA). This land is within the City of Moreno Valley and is included in the approved Moreno Highlands Specific Plan. That plan designates this property for a broad mix of urban uses including suburban residential, schools, parks, and roads. This land was purchased by the State in 1991 as additional upland habitat for the SJWA and also to act as a buffer between the sensitive biological resources of the SJWA and the future urban development under the Moreno Highlands Specific Plan. This land has been actively farmed for many decades and most of it remains in active production. The southwestern portion contains areas of non-native grasslands, although aerial photographs show that this area has been intermittently tilled over the last 80 years. This property is included in the General Plan Amendment and the Zone Change to replace the current urban land uses that are permitted and to replace them with Open Space and Public Facility designations. This property is not within the World Logistics Center Specific Plan (i.e., not in the area planned for development).

The San Diego Gas & Electric Company (SDG&E) and the Southern California Gas Company (SCGC) own a total of 194 acres of land immediately south of the Specific Plan site. These properties are included in the General Plan Amendment and the Zone Change to designate them for Open Space and Public Facilities uses. These designations are consistent with present uses. These properties are not within the World Logistics Specific Plan. Approximately 174 acres of

the land owned by SDG&E will be designated as Open Space. Nineteen acres of SDG&E land and one acre of SCGC land will be designated as Public Facilities.

3. Actions Covered by the EIR

The EIR will support the following discretionary and non-discretionary approvals:

- Approval of the World Logistics Center Specific Plan - The World Logistics Center Specific Plan is a master plan for a 2,610 acre site for the development of up to 40.6 million square feet of modern high-cube logistics and related warehouse distribution facilities defined as Logistics Development and Light Logistics. The Specific Plan establishes the master plan of development for the Project area, including development standards and use regulations, a master plan for circulation, infrastructure, architectural, landscape and design guidelines and sustainability goals - all of which will be applicable to all development within the area covered by the Specific Plan.
- General Plan Amendment (GPA) proposes a revision to the City General Plan land use designations for 3,714 acres. The GPA will replace the current Moreno Highland Specific Plan/General Plan Designations west of Gilman Springs Road with the following land use designations: (a) 2,610 acres for high cube logistics development; (b) 1,084 acres of Open Space; and (c) 20 acres for Public Facilities. The General Plan land use designation for the site would become Business Park/Light Industrial (BP).

The General Plan Amendment also includes amendments to several other elements, including the Community Development Element, the Parks, Recreation and Open Space Element, the Circulation Element, the Environmental Safety Element, and the Conservation Element to make them consistent with the Project.

- Change of Zone to establish the World Logistics Center Specific Plan, which will replace the Moreno Highlands Specific Plan west of Gilman Springs Road and rezone several other contiguous properties. The WLC Specific Plan will become the regulatory land use document for the entire 2,610 acre Specific Plan area. The project includes a Zone Change covering, 3,714 acres, which will designate 1,084 acres of land for Open Space (CDFW and SDG&E properties), 20 acres for Public Facilities (SDG&E and SCGC properties), and 2,610 acres for the World Logistics Center Specific Plan. The specific land use zones would be Logistics Development (LD) and Light Logistics (LL).
- Approval of the World Logistics Center Specific Plan EIR.

- Approval of the Development Agreement between the Project applicant, Highland Fairview, and the City of Moreno Valley in order to provide certainty for the future development of the Project for those parcels owned by Highland Fairview.
- Approval of a Tentative Parcel Map subdividing a portion of the Project site into large parcels. This map is for financing purposes only and does not create any development rights for the subdivided properties. Subsequent subdivision applications will be required prior to the development of any buildings on the site.
- Approval of the annexation for an 85-acre parcel located on the north side of Alessandro Boulevard at Gilman Springs Road. The Project includes pre-annexation General Plan land use designations to Specific Plan and pre-zoning Logistics Development (LD) for this parcel.

Approvals and permits required by other agencies include:

County of Riverside

- Local Agency Formation Commission (LAFCO): Annexation of 85-acre parcel.
- Flood Control and Water Conservation District: Amend Storm Drain Master Plan.

Other Affected Agencies

- Western Riverside Council of Governments: Transportation Uniform Mitigation Fee (TUMF) Contributions.
- Eastern Municipal Water District: Water Service Agreements.
- Developer will make “fair share” contributions to established development impact fee programs in the cities of Riverside, Perris, and Redlands for local road and intersection improvements identified in the programmatic Traffic Impact Assessment (TIA) included with the EIR (Final EIR Volume 3 Appendix L-1). This item is subject to review and approval by the City Transportation Division.

State of California

- Regional Water Quality Control Board: Water Quality Permitting.

- Department of Transportation (Caltrans): Encroachment Permits for SR-60 and adopt fair share contribution programs for future development within the WLCSP to contribute funds for local road and intersection improvements identified in the programmatic Traffic Impact Assessment (TIA) included with the EIR (Final EIR Volume 3 Appendix L-1).
- California Department of Fish and Wildlife: Streambed Alteration Agreements.

Federal Agencies

- U.S. Army Corps of Engineers: Clean Water Act Permitting.

B. PROJECT OBJECTIVES

The Project Objectives include the following:

- Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.
- Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan.
- Create a major logistics center with good regional and freeway access.
- Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.
- Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly to accommodate the next-generation of logistics buildings.
- Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach
- Create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity.
- Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.
- Encourage new development consistent with regional and municipal service capabilities.

- Significantly improve the City’s jobs/housing balance and help reduce unemployment within the City.
- Provide thousands of construction job opportunities during the Project’s buildout phase.
- Provide appropriate transitions between on-site and off-site uses.

III. ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

The City has conducted an extensive review of this Project which included the DEIR, FEIR and supporting technical studies, along with a public review and comment period first during the circulation of the Notice of Preparation, then through the circulation of the DEIR, and through the circulation of the FEIR. The following is a summary of the environmental review of this Project:

- On February 25, 2012, the City circulated a Notice of Preparation (“NOP”) that identified the environmental issues that the City anticipated would be analyzed in the Project’s DEIR to the State Clearinghouse, responsible agencies, and other interested parties.
- On March 12, 2012, the City conducted a public scoping meeting to allow members of the public to provide comments and input regarding the scope and content of the DEIR.
- The NOP public review period ran for 30 days, from February 25, 2012 to March 26, 2012. Written comments on the NOP were received from 27 different agencies, organizations, and individuals. The scope of the issues identified in the comments expressing concern included potential impacts associated with:
 - Aesthetics
 - Air Quality
 - Alternatives
 - Biological Resources
 - Cultural Resources
 - Greenhouse Gases
 - Geology & Soils
 - Hazards
 - Hydrology
 - Land Use
 - Noise
 - Population & Housing
 - Public Services
 - Traffic
 - Utilities

Based on the comments received pursuant to the NOP, it was determined that all environmental issues needed to be addressed in depth in the DEIR.

- As required by the California Environmental Quality Act (CEQA) Guidelines Section 15087, a Notice of Completion (NOC) of the Draft EIR State Clearinghouse No. 2012021045 for the WLC Project was filed with the State Clearinghouse on July 17, 2012, and the Notice of Availability (NOA) of the Draft EIR was filed with the Riverside County Clerk on July 18, 2012.
- The Draft EIR was circulated for public review for a period of 63 days, from February 4, 2013 to April 8, 2013. Copies of the Draft EIR were distributed to all Responsible Agencies and to the State Clearinghouse in addition to various public agencies, citizen groups, and interested individuals. Copies of the Draft EIR were also made available for public review at the City Planning Department, at one area library, and on the internet. A total of one-hundred and forty-four (144) comment letters were received during the public review period commenting on the EIR and WLC Project. Twenty-three (23) of the comment letters received were from Federal, State, regional, or local agencies. Fifteen (15) comment letters were received from private organizations or conservation groups, and one-hundred and six (106) letters were received from individuals. In addition, several letters/emails from individuals and one letter from the City of Redlands were received well after the close of the public review period. The City prepared specific responses to all comments. The responses to comments are included in FEIR, Volume 1.
- On May 1, 2015 in accordance with *Public Resources Code* Section 21092.5, the City provided written responses to public agencies that commented on the DEIR.
- On May 1, 2015, set forth the City circulated the FEIR for 45 days
- On May 1, 2015 and May 4, 2015, the Notice of the Planning Commission hearing to consider the project was provided in the following newspaper(s) of general and/or regional circulation:

Press Enterprise
- On _____, hearings held by the Planning Commission and its recommendations were _____
- On _____, Notice of the City Council hearing to consider the Project was

provided in the following newspaper(s) of general and/or regional circulation: Press Enterprise. On (date), this Council held a public hearing to consider the Project and staff recommendations. The City, after considering written comments and oral testimony on the EIR, determined that no new information was presented that would require recirculation of the EIR. Following public testimony, submission of additional written comments, and staff recommendations, this Council certified the EIR, adopted these Facts, Findings and the Statement of Overriding Considerations, and the further recommendations in the Staff Report, and approved the Project (collectively the “Approvals”).

IV. INDEPENDENT JUDGMENT FINDING

The Applicant retained the independent consulting firm of LSA Associates, Inc. (“LSA”) to prepare the EIR for the Project. LSA has prepared the EIR under the supervision, direction and review of the City with the assistance of an independent peer review by Dr. Timothy Krantz, University of Redlands and Fehr & Peers for the Traffic Impact Analysis. The City of Moreno Valley is the Lead Agency for the preparation of the EIR, as defined by CEQA CPRC Section 21067 as amended. The City Council has received and reviewed the EIR prior to certifying the EIR and prior to making any decision to approve or disapprove the Project.

Further, based on the review of the EIR conducted by Dr Krantz and Fehr & Peers, the City Council has determined that the analyses contained in the EIR have consistently been based on conservative assumptions and estimates of potential environmental impacts which are likely to result from the construction and operation of the World Logistics Center.

Finding: The EIR for the Project reflects the City’s independent judgment. The City has exercised independent judgment in accordance with *Public Resources Code* Section 21082.1(c) (3) in directing the consultant in the preparation of the EIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

A. GENERAL FINDING ON MITIGATION MEASURES

In preparing the Approvals for this Project, City staff incorporated the mitigation measures recommended in the EIR as applicable to the Project. In the event that the Approvals do not use the exact wording of the mitigation measures recommended in the EIR, in each such instance, the adopted

Approvals are intended to be identical or substantially similar to the recommended mitigation measure. Any minor revisions were made for the purpose of improving clarity or to better define the intended purpose.

Finding: Unless specifically stated to the contrary in these findings, it is this Council’s intent to adopt all mitigation measures recommended by the EIR which are applicable to the Project. If a measure has, through error, been omitted from the Approvals or from these Findings, and that measure is not specifically reflected in these Findings, that measure shall be deemed to be adopted pursuant to this paragraph. In addition, unless specifically stated to the contrary in these Findings, all Approvals repeating or rewording mitigation measures recommended in the EIR are intended to be substantially similar to the mitigation measures recommended in the EIR and are found to be equally effective in avoiding or lessening the identified environmental impact. In each instance, the Approvals contain the final wording for the mitigation measures.

V. ENVIRONMENTAL IMPACTS AND FINDINGS

City staff reports, the EIR, written and oral testimony at public meetings or hearings, these facts, findings, and statement of overriding considerations, and other information in the administrative record, serve as the basis for the City’s environmental determination.

The detailed analysis of potentially significant environmental impacts and mitigation measures for the Project is presented in Section 4.0 of the DEIR and FEIR Volumes 1 and 2. Responses to comments on the DEIR, along with copies of the comments, are provided in FEIR Volume 1.

The EIR evaluated fourteen major environmental categories for potential impacts including Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Noise, Population and Housing, Public Services and Facilities (including Recreation), Transportation, Utilities and Service Systems, and Greenhouse Gases and Global Climate Change. Both Project-specific and cumulative impacts were evaluated. Of these fourteen major environmental categories, this Council concurs with the conclusions in the EIR that the issues and sub issues discussed in Sections V.A and V.B below either are less-than-significant without mitigation or can be mitigated below a level of significance. For the remaining potential environmental impacts that cannot feasibly be mitigated below a level of significance discussed in Section V.C, overriding considerations exist which make these potential impacts acceptable to this Council.

A. LESS-THAN-SIGNIFICANT ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

The Moreno Valley City Council hereby finds that the following potential environmental impacts of the Project are less-than-significant and therefore do not require the imposition of mitigation measures.

1. Agricultural and Forestry Resources

a. Forest Land Zoning

Potential Significant Impact: Whether the Project would conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

Findings: Potential impacts of the Project related to forest land zoning are discussed in detail in Section 4.2 of the Final Environmental Impact Report Volume 3 Revised Draft Environmental Impact Report (FEIR Volume 3). Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to forest land and timberland; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.2 of the FEIR Volume 3 and the California Department of Forestry and Fire Protection, there are no areas designated as forest land or timberland on the Project site. Therefore, no significant impacts would occur from the implementation of the Project. (FEIR, Volume 3 pg. 4.2-16).

b. Loss or Conversion of Forest Land

Potential Significant Impact: Whether the Project would result in the loss of forest land or conversion of forest land to non-forest use.

Findings: Potential impacts of the Project related to conversion of forest land are discussed in detail in Section 4.2 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to the conversion of forest land; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.2 of the FEIR Volume 3 and the California Department of Forestry and Fire Protection, there are no areas designated as forest land on the Project

site. Therefore, no significant impacts would occur from the implementation of the Project (FEIR, Volume 3 pg. 4.2-16).

c. Existing Zoning and Williamson Act

Potential Significant Impact: Whether the Project would conflict with existing zoning for agricultural use or a Williamson Act contract.

Findings: Potential impacts of the Project related to conflicts with existing zoning for agricultural uses or Williamson Act properties are discussed in detail in Section 4.2 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in conflicts with existing agricultural zoning or an existing Williamson Act; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.2 of the FEIR Volume 3, while some portions of the 3,714-acre Project site are currently used for agriculture, there are no Williamson Act contracts on either the Project site or any adjacent properties. The City's General Plan Land Use Map identifies that there are no agricultural zones identified on the Project site or on any of the surrounding properties. Because the Project would not conflict with any Williamson Act contracts or lands zoned for agriculture, the impacts related to this issue would be less than significant and no mitigation is required. (FEIR, Volume 3 pgs. 4.2-17).

2. Air Quality

a. Odors

Potential Significant Impact: Whether the Project would create objectionable odors affecting a substantial number of people.

Findings: Potential impacts of the Project related to odors are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to odors; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.3 of the FEIR Volume 3, diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Diesel exhaust would also be emitted during operation of the Project from the long-haul trucks that would visit the Project site. However, the concentrations would not be at a level to result in a negative odor response at nearby sensitive or worker receptors. In addition,

modern emission control systems on diesel vehicles since 2007 virtually eliminate diesel's characteristic odor.

During blow-down maintenance activities, natural gas odors will be present around the SDG&E Compressor Plant located on the Project site. When this portion of the WLC Specific Plan is developed, these odors will occasionally be detectable from the industrial warehouse properties adjacent to the SDG&E facility. These odors will be infrequent and odorized natural gas will not be present in high concentrations. Therefore, potential odor impacts from on-site natural gas operations are considered to be less than significant and do not require mitigation.

SCAQMD Rule 402 dictates that air pollutants discharged from any source shall not cause injury, nuisance, or annoyance to the health, safety, or comfort of the public. While the application of architectural coatings and installation of asphalt may generate odors, these odors are temporary and not likely to be noticeable beyond the Project boundaries. SCAQMD Rules 1108 and 1113 identify standards regarding the application of asphalt and architectural coatings, respectively.

SCAQMD Rule 1108 sets limitations on ROG (reactive organic gases), which are similar to and interchangeable with volatile organic compounds (VOC) content in asphalt. This rule is applicable to any person who supplies, sells, offers for sale, or manufactures any asphalt materials for use in the South Coast Air Basin. Rule 1113 of the SCAQMD deals with the selling and application of architectural coatings. Rule 1113 is applicable to any person who supplies, sells, offers for sale, or manufactures any architectural coating for use in the Basin that is intended to be applied to buildings, pavements, or curbs. This rule is also applicable to any person who applies or solicits the application of any architectural coating within the Basin. Rule 1113 sets limits on the amount of VOC emissions allowed for all types of architectural coatings, along with a time table for tightening the emissions standards in the future. Compliance with Rule 1113 means that architectural coatings used during construction would have VOC emissions that comply with these limits.

Adherence to applicable provisions of these rules is standard for all development within the Basin. In addition, conditions for the design of waste storage areas on the site would be established through the permit process to ensure enclosures are appropriately designed and maintained to prevent the proliferation of odors. Solid waste generated by the on-site uses will be collected by a contracted waste hauler, ensuring that any odors resulting from on-site uses would be adequately managed. Therefore, impacts associated with this issue would be less than significant and no mitigation is required. (FEIR, Volume 3 pgs. 4.3-67 to 4.3-69).

b. Long-Term Microscale (CO Hot Spot Emissions)

Potential Significant Impact: Whether the Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

For CO, the applicable thresholds are:

- California State one-hour CO standard of 20.0 ppm; and
- California State eight-hour CO standard of 9.0 ppm.

Findings: Potential impacts of the Project related to long-term microscale (CO Hot Spot) emissions are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to long-term microscale (CO Hot Spot) emissions; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.3 of the FEIR Volume 3, vehicular trips associated with the development of the Project could contribute to congestion at intersections and along roadway segments in the Project vicinity resulting in potential local CO “hot spot” impacts. A CO hot spot is a localized concentration of CO that is above the State or Federal 1-hour or 8-hour CO ambient air standards. Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles. To provide a worst-case scenario, CO concentrations are estimated at Project-impacted intersections where the concentrations would be the greatest.

For this Project analysis, the top five intersections with the highest traffic volumes and the LOS E or F before mitigation were identified for 2022 using information from the table in the traffic study “Intersection LOS under 2022 Plus Project Phase 1 Conditions.” The five intersections with the greatest LOS before mitigation were also identified for 2035 using information from the table in the traffic study “Intersection LOS under 2035 Plus Build-out Conditions. The estimated 1-hour and 8-hour average CO concentrations from Project-generated and cumulative traffic plus the background concentrations are below the State and Federal standards. No CO hot spots are anticipated because of traffic-generated emissions by the Project in combination with other anticipated development in the area. Therefore, the mobile emissions of CO from the Project are not anticipated to contribute substantially to an existing or projected air quality violation of CO. Therefore, according to this criterion, air pollutant emissions during operation would result in a less than significant impact. No mitigation is required (FEIR, Volume 3 pgs. 4.3-69 to 4.3-70).

c. Acute and Chronic Non-Cancer Health Risk Emission Impacts

Potential Significant Impact: Whether the Project would expose sensitive receptors to substantial pollutant concentrations resulting in acute and chronic non-cancer health risk impacts.

For non-cancer health risk hazard index (HI); the applicable threshold is:

- A cumulative increase for any target organ system exceeding 1.0 at any receptor location.

Findings: Potential impacts of the Project related to acute and chronic non-cancer health risk emission impacts are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to acute and chronic non-cancer health risks related to Project emissions; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.3 of the FEIR Volume 3, the construction and operation of the Project would not emit any toxic chemicals in any significant quantity other than vehicle exhaust. While there may be other toxic substances in use on site, compliance with State and Federal handling regulations will bring these emissions to below a level of significance.

Exposure to diesel exhaust can have immediate (acute) health effects, such as irritation of the eyes, nose, throat, and lungs, and can cause coughs, headaches, light headedness, and nausea. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. However, according to the rulemaking on *Identifying Particulate Emissions from Diesel-Fueled Engines as a Toxic Air Contaminant* (CARB 1998), the available data from studies of humans exposed to diesel exhaust are not sufficient for deriving an acute non-cancer health risk guidance value. The analysis, however, does derive an estimate of acute non-cancer risks by examining the acute health effects of the various toxic components that comprise diesel and gasoline emissions. There is specific guidance for estimating the acute non-cancer hazards from these toxic components which was used in the revised analysis to determine the Project's acute non-cancer hazards.

To determine the Project's *chronic* hazard impact, the highest annual diesel PM concentration was determined covering the years 2015 (the commencement of Project construction) to 2031 (the first year with full build out of the Project). In this regard, the highest annual average diesel PM concentration determined through air dispersion modeling was 1.04 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) in 2021, at an existing residence located within the Project boundaries. This diesel PM concentration was due to the impacts of diesel PM emissions from the off-road construction equipment active during 2021. This level

of diesel PM impact results in a chronic non-hazard index of 0.21. This hazard index is less than the South Coast Air Quality Management District (SCAQMD) significance level of 1.0, and is, therefore, less than significant.

The estimation of the *acute* non-cancer hazard index requires the estimation of the maximum 1-hour impacts of total organic gases (TOG). Estimates of the Project's maximum 1-hour TOG emissions were derived from the Project's peak hour traffic data along the nearly 500 roadway segments contained within the assessment and then broken down into the various toxic air contaminant components by fuel type, gasoline and diesel. The acute non-cancer hazard index was determined for a worst-case condition that assumed the Project would be completely built out in 2012 with the Project's attendant traffic and emission estimates as they would exist in 2012. This condition is the same as the Project Phase 1 and Phase 2 Full Build Out (2021) condition assumed in the Localized Significance Threshold (LST) assessment provided earlier. Based on this information, the maximum acute non-cancer hazard index found at any receptor within the model domain was 0.05, which is less than the SCAQMD's non-cancer hazard index of 1.0, and, therefore, is less than significant.

Therefore, the potential for short-term acute and chronic exposure from diesel exhaust are considered to be less than significant and no mitigation is required. (FEIR, Volume 3 pgs. 4.3-103 to 4.3-104).

d. Cancer Risks – Onsite and Offsite Workers (25-year)

Potential Significant Impact: Whether the Project would expose onsite and offsite workers including school staff to substantial pollutant concentrations resulting in cancer risk impacts.

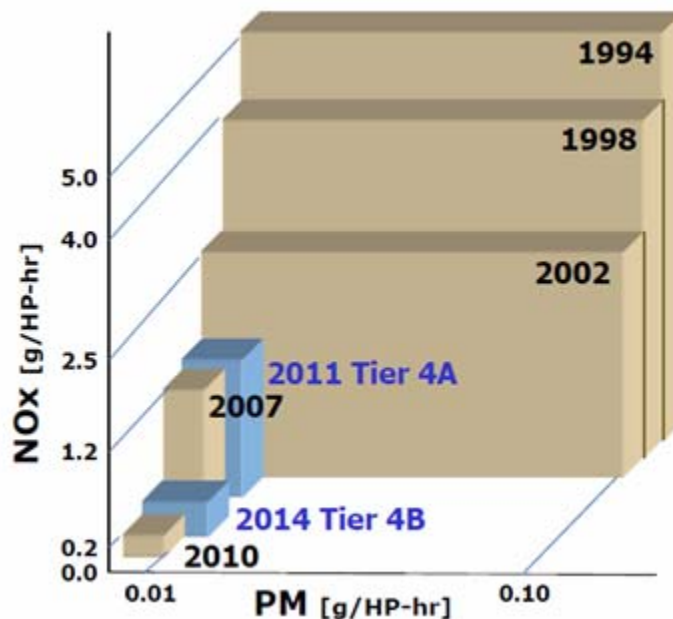
Findings: Potential impacts of the Project related to cancer risk impacts on onsite and offsite workers are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to cancer risk impacts on expose onsite and offsite workers including school staff related to Project emissions; therefore, no mitigation is required.

Facts in Support of the Findings: In January 2015, the results of a 5½-year study, led by the Health Effects Institute (HEI), were published regarding the health effects of new technology diesel exhaust and particularly the risk of cancer from exposure to diesel exhaust. The study found that new technology diesel exhaust does not cause cancer.

The HEI study distinguishes between older Traditional Diesel Engines (TDE) (exhaust from engines that are older than model year 2007) and new technology diesel exhaust (NTDE) (exhaust from engines that

model year 2007 or newer), which is 90-99% cleaner than TDE. The revised mitigation measures require that all diesel trucks accessing the project during operation be model year 2010 or newer and that all off-road equipment be Tier 4. The principal implication of the HEI study results to the WLC are that the project mitigation requiring the application of Model Year 2010 engines as well as the use of Tier 4-compliant off-road construction equipment are not expected to result in emissions that would be associated with the formation of cancer in exposed individuals. The results of the HEI study indicate that the project mitigation requiring the application of Model Year 2010 engines as well as the use of Tier 4-compliant off-road construction equipment are not expected to result in emissions that would be associated with the formation of cancer in exposed individuals.

The HEI announced the results of the final phase of its Advanced Collaborative Emissions Study (ACES), the first comprehensive evaluation of lifetime exposures of rats to exhaust from diesel engines designed to meet the strict USEPA emission regulations enacted in 2007. Phase 3 of ACES evaluated whether emissions from new technology diesel engines cause cancer or other adverse health effects. Specifically, it evaluated the health impacts of a 2007-compliant engine equipped with a diesel particulate filter. HEI found that lifetime exposure to new technology diesel exhaust (NTDE) did not cause carcinogenic lung tumors. The study also confirmed that the concentrations of particulate matter and toxic air pollutants emitted from NTDE are more than 90% lower than emissions from traditional older diesel engine.



Changes in U.S. Heavy-Duty Diesel NOx and PM Emission Standards

The HEI study clearly demonstrates that the application of new emissions control technology to diesel engines have virtually eliminated the adverse health impacts of diesel exhaust.

Mitigation Measures 4.3.6.2A and 4.3.6.3B require that access to the site be limited to 2010-compliant trucks for operation and that Tier 4 equipment be used for construction, both of which rely on diesel particulate filters similar to those tested in the HEI study. As a result of the very low emissions from new technology diesel engines and the research conducted by HEI, it is projected that the proposed project would not result in any new cancer risks from the project's diesel emissions. Therefore, the project would have a less than significant health risk impact.

For comparison to the DEIR, the following discussion analyzes the health risks which would occur if NTDE could cause cancer, which, as noted above, it does not. This is only for informational purposes and does not reflect the health risks associated with the World Logistics Center project.

According to Section 4.3 of the FEIR Volume 3, estimates of worker exposures were prepared based on the assumption of a 25-year exposure duration for 50 weeks per year and 8 hours per day. For reference, a risk level of 1 in a million implies a likelihood that up to one person, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the specific concentration of diesel PM over 25 years. This risk would be an excess cancer risk that is in addition to any cancer risk borne by a person not exposed to these air toxics. The highest worker cancer risk estimates prior to the application of mitigation are greater than the SCAQMD cancer risk threshold of 10 in a million at 10.1 in a million inside the project boundaries and 4.1 in a million outside the project boundaries (FEIR, Volume 3 pg. 4.3-105 to 4.3-106).

e. Cancer Risks – Schools

Potential Significant Impact: Whether the Project would expose schools (students) to substantial pollutant concentrations resulting in cancer risk impacts.

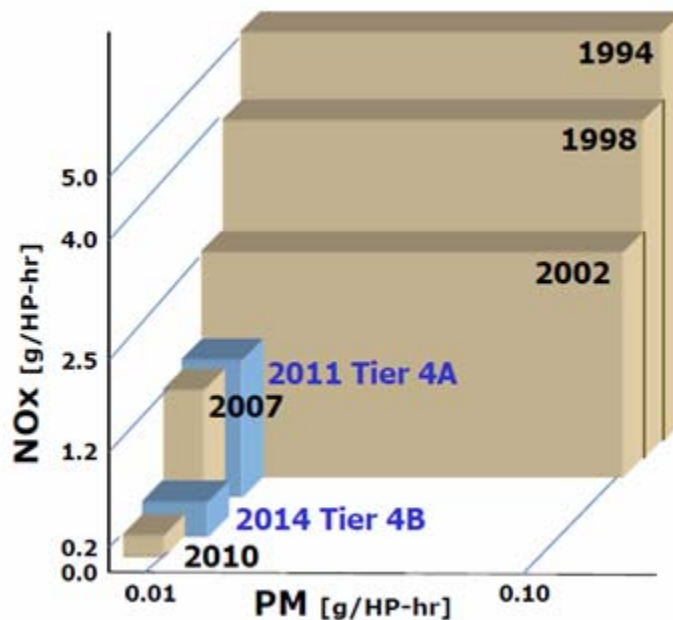
Findings: Potential impacts of the Project related to cancer risk impacts on school children are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to cancer risk impacts on school children related to Project emissions; therefore, no mitigation is required.

Facts in Support of the Findings: In January 2015, the results of a 5½-year study, led by the Health Effects Institute(HEI), were published regarding the health effects of new technology diesel exhaust and

particularly the risk of cancer from exposure to diesel exhaust. The study found that new technology diesel exhaust does not cause cancer.

The HEI study distinguishes between older Traditional Diesel Engines (TDE) (exhaust from engines that are older than model year 2007) and new technology diesel exhaust (NTDE) (exhaust from engines that model year 2007 or newer), which is 90-99% cleaner than TDE. The revised mitigation measures require that all diesel trucks accessing the project during operation be model year 2010 or newer and that all off-road equipment be Tier 4. The results of the HEI study indicate that the project mitigation requiring the application of Model Year 2010 engines as well as the use of Tier 4-compliant off-road construction equipment are not expected to result in emissions that would be associated with the formation of cancer in exposed individuals.

The HEI announced the results of the final phase of its Advanced Collaborative Emissions Study (ACES), the first comprehensive evaluation of lifetime exposures of rats to exhaust from diesel engines designed to meet the strict USEPA emission regulations enacted in 2007. Phase 3 of ACES evaluated whether emissions from new technology diesel engines cause cancer or other adverse health effects. Specifically, it evaluated the health impacts of a 2007-compliant engine equipped with a diesel particulate filter. HEI found that lifetime exposure to new technology diesel exhaust (NTDE) did not cause carcinogenic lung tumors. The study also confirmed that the concentrations of particulate matter and toxic air pollutants emitted from NTDE are more than 90% lower than emissions from traditional older diesel engine.



Changes in U.S. Heavy-Duty Diesel NOx and PM Emission Standards

The HEI study clearly demonstrates that the application of new emissions control technology to diesel engines have virtually eliminated the adverse health impacts of diesel exhaust. Mitigation Measures 4.3.6.2A and 4.3.6.3B require that access to the site be limited to 2010-compliant trucks for operation and that Tier 4 equipment be used for construction, both of which rely on diesel particulate filters similar to those tested in the HEI study. These vehicles reduce emissions by 90% when compared to 2006 vehicles and by 99% when compared to uncontrolled diesel engines. As a result of the very low emissions from new technology diesel engines and the research conducted by HEI, it is projected that the proposed project would not result in any new cancer risks from the project's diesel emissions. Therefore, the project would have a less than significant health risk impact.

For comparison to the DEIR, the following discussion analyzes the health risks which would occur if NTDE could cause cancer, which, as noted above, it does not. This is only for informational purposes and does not reflect the health risks associated with the World Logistics Center project.

According to Section 4.3 of the FEIR Volume 3 and Appendix D, there are several schools located within eight miles to the west of the project. Students actually spend a limited time at a given school or nearby schools during the course of their education. Despite the findings of the HEI report that found no cancer risk from NTDE, the FEIR also presented the results using the Current OEHHA methodology. Accordingly, student exposures were calculated based on a student presence of 8 hours/day, 180 days per year for 9 years, which captures the potential impacts of exposures to school-age children. The OEHHA methodology assumes that school age children may be more susceptible to the impacts of toxic air contaminants because of their rapidly developing physiology and their greater respiratory rates compared to their body weight compared to adults. The estimated cancer risks for school-age children were multiplied by an age sensitivity factor (ASF) as contained in the Current OEHHA Guidance to estimate cancer risks to school age children for informational purposes. (FEIR, Volume 2, Appendix D-1 pgs. 177-178) The highest risk noted at any school site was 3.2 in a million. Impacts at schools are less than the 10 in one million significance threshold and are therefore, less than significant. (FEIR, Volume 3 pg. 4.3-105).

f. Cumulative CO Hot Spot Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would have an incremental impact on CO hot spots.

Findings: Potential impacts of the Project related to cumulative CO hot spot impacts are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that

no significant cumulative impacts related to CO hot spot impacts will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.3 of the FEIR Volume 3, no significant CO hot spot impacts would occur. It is anticipated that CO emissions in the future will decrease with advances in technology. As previously identified, background concentrations in future years are anticipated to continue to decrease as the concerted effort to improve regional air quality progresses. Therefore, CO concentrations in the future years would generally be lower than existing conditions. Based on the analysis, because no CO hot spot impacts would occur, it is reasonable to assume that a less than significant cumulative CO impact would occur. (FEIR, Volume 3 pg. 4.3-112).

g. Cumulative Cancer Risks – Worker Exposure

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would have an incremental impact cancer risks for on-site workers.

Findings: Potential impacts of the Project related to cumulative cancer risks for on-site workers are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant cumulative impacts related to cancer risks for on-site workers will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.3 of the FEIR Volume 3, an analysis of onsite worker found no exceedances of the SCAQMD threshold (FEIR, Volume 3 pg. 4.3-154).

In addition, the risks will be less than significant based on the new health research results from the Health Effects Institute (HEI) that evaluated the health effects of diesel PM emissions from new technology diesel engines such as those that are required as a mitigation measure for this project (Mitigation Measure 4.3.6.3B) that requires that all diesel fueled trucks must be compliant with Model Year 2010 truck emission standards. The HEI study clearly demonstrates that the application of new emissions control technology to diesel engines have virtually eliminated the health impacts of diesel exhaust that were identified when it was designated a toxic air contaminant by CARB in 1998.

h. Cumulative Non-Cancer Acute and Chronic Hazard Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would have an incremental impact on non-cancer acute and chronic hazard impacts.

Findings: Potential impacts of the Project related to cumulative non-cancer acute and chronic hazard impacts are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant cumulative impacts related to non-cancer acute and chronic hazard impacts will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.3 of the FEIR Volume 3, the maximum non-cancer chronic hazard index and acute non-cancer hazard index from the operation of the Project are estimated to be less than 0.05 at any location outside of the boundaries of the Project. This index value is less than the SCAQMD's non-cancer hazard index significance threshold of 1.0. Therefore, the Project would also have a less than significant cumulative non-cancer hazard impact. (FEIR, Volume 3 pg. 4.3-122).

3. Biological Resources

a. Adopted Policies and Ordinances

Potential Significant Impact: Whether the Project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Findings: Potential impacts of the Project related to adopted policies and ordinances are discussed in detail in Section 4.4 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in conflict with local policies or ordinances and, therefore, no mitigation is required.

Facts in Support of the Findings: As detailed in Section 4.4 of the FEIR Volume 3, City policies or ordinances identified in the General Plan protecting biological resources are summarized in Table 4.4.E: General Plan and Municipal Code Biological Resource Policies (FEIR, Volume 3, pg. 4.4-72) As detailed in Table 4.4.E, the Project is consistent with local policies and ordinances protecting biological resources that apply to the Project area. Compliance with State and Federal regulations to ensure protection and preservation of significant biological resources, and the implementation of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) are the applicable policies/programs that the Project must implement. As there are no other local policies or ordinances regarding the protection of biological resources identified by the City or other local jurisdiction applicable to the Project site, no impact would occur and no mitigation is required. (FEIR, Volume 3 pgs. 4.4-72 to 4.4-73).

b. Habitat Fragmentation/Wildlife Movement

Potential Significant Impact: Whether the Project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Findings: Potential impacts of the Project related to habitat fragmentation/wildlife movement are discussed in detail in Section 4.4 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in habitat fragmentation or interfere with wildlife movement; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.4 of the FEIR Volume 3, the Project area contains no significant cover of native plant communities and currently experiences heavy disturbance associated with agricultural activities. Additionally, the Project area is adjacent to State Route 60 (SR-60) and Gilman Springs Road on the north and east and is bordered by urban development on the west. The nearest linkage area as identified under the MSHCP is Proposed Linkage 5 and is located approximately 3 miles north of the Project and approximately 3.6 miles south of the Project is Proposed Constrained Link 20. The development of the Project area will not impede the movement of any wildlife; therefore, the Project will not affect any wildlife movement corridor.

The 910-acre Conservation Buffer Area located in the southern portion of the Project area is owned by the CDFW and currently regularly disked as part of the San Jacinto Wildlife Area (SJWA) agricultural operations. It currently provides foraging habitat for various resident and migratory wildlife species. The portion of the Project area adjacent to the SJWA lands has been actively farmed for decades and is regularly disked. The Conservation Buffer Area is designated as open space in the Project and no development is proposed for this area.

Although the Project area does not contain any designated wildlife movement corridors or MSHCP linkages (i.e., MSHCP, City General Plan, etc.) it is likely that wildlife moves through adjacent properties such as the SJWA and the Mystic Lake area to the south, the Badlands area to the east and the Lake Perris State Recreation Area to the southwest. The Project biological report concluded that development of the Project as proposed would not have any significant impact on wildlife movement in the area, and would not fragment habitat or adversely affect wildlife movement through the surrounding areas. In addition, Drainage 12 is being designed to allow for wildlife movement between the Badlands and the SJWA (e.g., relatively natural channel conditions with 50-foot setbacks on either side of the channel through the WLC

Specific Plan property. Therefore, impacts related to wildlife movement are less than significant, and no mitigation is needed. (FEIR, Volume 3 pg. 4.4-73 to 4.4-74).

4. Cultural Resources

a. Human Remains

Potential Significant Impact: Whether the Project would disturb any human remains, including those interred outside of formal cemeteries.

Findings: Potential impacts of the Project related to human remains are discussed in detail in Section 4.5 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts to human remains; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.5 of the FEIR Volume 3, the Project site is currently undeveloped. No evidence suggesting the Project site has been utilized in the past for human burials has been identified. In the unlikely event that human remains are discovered during grading or construction activities within the Project site, compliance with State law (Health and Safety Code § 7050.5) (HSC § 7050.5) would be required. State law requires that no further disturbance shall occur until the County Coroner has made determination of the origin and disposition pursuant to Public Resources Code 5097.98. Because adherence to provisions of Health and Safety Code §7050.5 is required of all development projects, and because adherence to the requirements in State law sufficiently mitigates for potential impacts to human remains, no significant impact related to this issue will occur. Because potential impacts associated with this issue are less than significant, no mitigation is required. (FEIR, Volume 3 pgs. 4.5-16 to 4.5-17).

5. Geology and Soils

a. Landslides and Rockfalls

Potential Significant Impact: Whether the Project would expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

Findings: Potential impacts of the Project related to landslides and rockslides are discussed in detail in Section 4.6 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to landslides and rockslides that may result in loss, injury or death; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.6 of the FEIR Volume 3, a large older landslide has been mapped primarily off site on the north easterly flanks of Mount Russell, near the

southwest portion of the property. The landslide appears to have originated on the higher slopes off site, and moved northeast, partially onto the subject property. The Specific Plan designates 74.3 acres in the southwestern portion of the property as open space. This 74.3 acres includes the steepest slopes on site (i.e., the Mount Russell foothills), which will reduce the potential for significant landslide or rockfall impacts on the Project to less than significant levels; therefore, no mitigation is required. (FEIR, Volume 3 pg. 4.6-13)

b. Soil Erosion or Loss of Top Soil

Potential Significant Impact: Whether the Project would result in substantial soil erosion or the loss of topsoil.

Findings: Potential impacts of the Project related to soil erosion or loss of topsoil are discussed in detail in Section 4.6 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts due to soil erosion or loss of topsoil; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.6 of the FEIR Volume 3, development of the site would require the movement of on-site soils. Portions of the site have been and are being used for dry farming, and several rural residences are present. Prior to the issuance of grading permits, the Project proponent will be required to prepare and submit detailed grading plans as each phase is developed. These plans will be prepared in conformance with applicable standards of the City's Grading Ordinance. Construction of off-site utility and roadway improvements will also result in the movement of soil. Plans are not available at this time for off-site improvements but that construction will be subject to the same permitting and plan checking processes.

Development of the site and related off-site improvements would involve the disturbance of more than one acre; therefore, the Project is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit. A Storm Water Pollution Prevention Plan (SWPPP) will also be required to address erosion and discharge impacts associated with the proposed on-site grading. Compliance with storm water regulations include minimizing storm water contact with potential pollutants by providing covers and secondary containment for construction materials, designating areas away from storm drain systems for storing equipment and materials and implementing good housekeeping practices at the construction site.

Additionally, a preliminary Water Quality Management Plan (WQMP) was prepared for the WLC Specific Plan and contains the post-construction measures, which will help reduce potential impacts to soil erosion to less than significant levels and identifies measures to treat and/or limit the entry of

contaminants into the storm drain system. The WQMP is incorporated by reference and/or attached to the Project's SWPPP as the Post-Construction Management Plan.

As soils covering the Project site have a slight-to-high erosion hazard potential and because the Project would be required to adhere to the City's Grading Ordinance, obtain an NPDES Permit, and prepare an SWPPP and a WQMP, construction and operational impacts associated with soil erosion hazards are considered to be less than significant, and no mitigation is required.

Grading for off-site improvements would require subsequent grading permits or related approvals from both the City and County of Riverside, depending on the improvement and its location. Most roadway and intersection improvements will occur within existing rights-of-way or on land that has been previously disturbed. The SWPPP and the WQMP establish performance standards for future development, and implementation the identified measures in those plans will reduce potential erosion impacts to less than significant levels. (FEIR, Volume 3 pgs. 4.6-13 to 4.6-16).

c. Septic Tanks

Potential Significant Impact: Whether the Project would have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Findings: Potential impacts of the Project related to septic tanks are discussed in detail in Section 4.6 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to soils that may be incapable of supporting septic tanks or alternative wastewater disposal systems; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.6 of the FEIR Volume 3, all buildings within the Project will be connected to existing wastewater facilities (sewer) owned and operated by the Eastern Municipal Water District. Septic tanks will not be used anywhere within the Project; therefore, no mitigation is required. (FEIR Volume 3 pg. 4.6-16).

d. Seismic-Related Ground Failure

Potential Significant Impact: Whether the Project would expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic ground failure.

Findings: Potential impacts of the Project related to seismic-related ground failure are discussed in detail in Section 4.6 of the FEIR Volume 3. Based on the entire record before us, this Council finds that

development of the Project will not result in significant impacts related to seismic-related ground failure; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.6 of the FEIR Volume 3, the Project site is located within Seismic Zone 4 as defined by the Uniform Building Code (UBC). Exhibit S4 of the Safety Element of the City's General Plan indicates that the Project site is not located in an area susceptible to landslides or slope instability. The Project site lies on relatively flat terrain ($\pm 2\%$ grade) and no landslide areas or mass movement were observed onsite. The only steep topographical features are located in the southwest corner of the Project area. This area is designated for Open Space uses and is not proposed for development.

The Project does not propose any activity known to cause damage by subsidence (e.g., oil, gas, or groundwater extraction). Settlement generally occurs within areas of loose, granular soils with relatively low density. The Project site is underlain by relatively dense alluvial and dense sedimentary bedrock materials at depth and the potential for settlement is considered low. Because the Project site does not exhibit characteristics of a high potential for subsidence or settlement, impacts are considered less than significant. No mitigation is required.

The potential for liquefaction generally occurs during strong ground shaking within relatively cohesionless loose sediments where the groundwater is typically less than 50 feet below the surface. Because the Project site does not exhibit characteristics of a high potential for liquefaction induced settlement (i.e., relatively dense soils with groundwater levels in excess of 100 feet), impacts are considered less than significant. No mitigation is required. (FEIR, Volume 3 pg. 4.6-16).

e. Cumulative Geology Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would have a cumulative significant impact on geologic resources.

Findings: Potential cumulative impacts of the Project related geologic resources are discussed in detail in Section 4.6 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts related to geologic resources; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.6 of the FEIR Volume 3, the cumulative area for geologic issues is the City of Moreno Valley and western Riverside County, within the larger context of southern California due to regional seismicity. The Project area has potential geotechnical and soils

constraints, as the entire southern California area contains a number of major regional and local faults, including the San Andreas, San Jacinto, and Elsinore Faults.

The presence of regional faults creates the potential for damage to structures or injury to persons during seismic events. However, City, County, and State regulations provide guidelines for development in areas with geologic constraints and ensure that the design of buildings is in accordance with applicable California Building Code standards and other applicable standards, which reduces potential property damage and human safety risks to less than significant levels. Anticipated development in the City and surrounding area in general will not have a cumulatively considerable impact on earth resources, nor will regional geotechnical constraints have a cumulatively considerable impact on the WLC Project or cumulative projects, as long as proper design and engineering are implemented based on available seismic and other geotechnical data. The WLC Project represents an incremental portion of this potential impact, so the Project will not have cumulatively significant impacts in this regard.

Because it is reasonable to conclude that all development within seismically active areas will be required to adhere to applicable State regulations, California Building Code standards, and the design and siting standards required by local agencies, a less than significant cumulative impact would occur with implementation of the WLC Project. (FEIR, Volume 3 pgs. 4.6-23).

6. Greenhouse Gas Emissions

a. Cumulative Greenhouse Gas Emissions Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would have a cumulative significant impact from greenhouse gas emissions.

Findings: Potential cumulative impacts of the Project related greenhouse gas emissions are discussed in detail in Section 4.7 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts related to greenhouse gas emissions therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.7 of the FEIR Volume 3, while it is not possible for any one development project to have a significant impact on global warming or climate change, the project will contribute to cumulative GHG emissions in California. Cumulatively, the buildout of the project would contribute approximately from 12,000 metric tons of CO₂e in its first year of construction up to 386,000 mt CO₂e per year at buildout (with mitigation). Of those emissions at buildout, the majority, 98 percent, are within the AB 32 cap meaning that total emissions will not increase due to the cap-and-trade program. The remainder, 6,000 mt CO₂e, per year at buildout represents an increase in

uncapped emissions, which is 0.001 percent of California's total emissions of 458.68 million mt of CO₂e in 2012 for the entire State. Comparing the state inventory to the project's inventory is not a straightforward comparison because different methods are utilized in each inventory. The mitigation measures discussed above will reduce the project's emissions of GHGs to below significance. The CARB is currently in the process of designing regulations to monitor, limit, and ultimately reduce California GHG emissions, but there are as yet no adopted numerical or quantifiable standards for assessing the significance of cumulative impacts from projects in the South Coast Air Basin.

Cumulatively, the emissions from electricity production (which are capped under the requirements of AB 32) would comprise approximately 26 percent of the project's total CO₂e emissions. Water usage and solid waste disposal emissions comprise approximately 2 percent of the project's total CO₂e emissions while the emissions from vehicle exhaust would comprise approximately 70 percent of the project's total CO₂e emissions. The emissions from vehicle exhaust are controlled by the State and Federal governments and are outside the control of the City. The remaining CO₂e emissions are primarily associated with building systems. The project is required to comply with existing State and Federal regulations regarding the energy efficiency of buildings, appliances, and lighting, which would reduce the project's electricity demand. The new buildings constructed in accordance with current energy efficiency standards would be more energy-efficient than older buildings.

With implementation of the strategies and programs described previously, the project is consistent with the strategies to reduce California's emissions to the levels proposed in Executive Order S-3-05. In addition, emissions not covered or capped by AB 32 are below the significance threshold. Therefore, cumulative greenhouse gas emissions impacts are less than significant. (FEIR, Volume 3 pgs. 4.7-60 to 4.7-61).

7. Hazards and Hazardous Materials

a. Within Two Miles of a Public Airport or Within an Airport Land Use Plan or Within Two Miles of a Private Airport

Potential Significant Impact: Whether the Project would result in a safety hazard for people residing or working in the Project area or be located within an airport land use plan or where such a plan has not been adopted within two miles of a public airport or public use airport, resulting in a safety hazard for people residing or working in the Project area.

Findings: Potential impacts of the Project related to safety hazards associated with proximity to public and private airports are discussed in detail in Section 4.8 of the FEIR Volume 3. Based on the entire

record before us, this Council finds that development of the Project will not result in significant impacts related to airport safety hazards; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.8 of the FEIR Volume 3, the nearest airport to the Project area is March Air Reserve Base (MARB), approximately 5.5 miles to the southwest. The airfield is operated by two entities, MARB (military) and March Inland Port Airport Authority (quasi-governmental/private). In addition, Perris Valley Airport is located approximate 15 miles southwest of the Project area. Perris Valley Airport is a private airport that is open to the public, and is utilized for skydiving and ballooning activities. The WLC Project area is not located within the Airport Influence Area for either airport. Given the distance of the WLC Project area to both airports in the vicinity, the development of the WLC Project area as proposed would not result in private airport safety hazards for people working in the WLC Project area. No impacts associated with this issue would occur and no mitigation is required. (FEIR, Volume 3 pg. 4.8-15).

b. Existing or Proposed Schools

Potential Significant Impact: Whether the Project would create hazardous emissions or handle acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Findings: Potential impacts of the Project related to existing or proposed schools are discussed in detail in Section 4.8 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant hazardous materials impacts related to existing or proposed schools; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.8 of the FEIR Volume 3, there are no existing school facilities within one-quarter of a mile of the Project area. The nearest existing school is Calvary Chapel Christian School which is located approximately 1.17 miles northwest of the Project. There is one proposed elementary school site that is located within one-quarter mile of the WLC Project area. The site for proposed Wilmot Elementary School is located on Bay Avenue at Wilmot Street, approximately 0.25 mile west of the Project area.

The amount and type of materials that would be used during Project construction (building and infrastructure) or stored in the high-cube logistics distribution center after construction is unknown at this time. While the warehouse facilities themselves are not expected to utilize acutely hazardous materials, the possibility exists that such materials could be stored or transported to and from the Project site. For the purposes of this analysis, it is assumed that the Project will handle substances that may be acutely hazardous. The handling of hazardous materials or emission of hazardous substances in accordance with

the Hazardous Materials Business Emergency Plan (HMBEP) as required by applicable local, State, and Federal standards, ordinances, and regulations will ensure that impacts associated with environmental and health hazards related to an accidental release of hazardous materials or emissions of hazardous substance near existing or proposed schools are less than significant and no mitigation is required. (FEIR, Volume 3 pgs. 4.8-15 through 4.8-16).

c. Routine Transport, Use, or Disposal of Hazardous Materials and Reasonable Foreseeable Upset and Accident Conditions

Potential Significant Impact: Whether the Project would create a significant hazard to the public through the routine transport, use, or disposal of hazardous materials or create a significant hazard to the public or the environment through reasonably foreseeable upset and accident. Whether the Project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Findings: Potential impacts of the Project related to the routine transport, use, or disposal of hazardous materials and reasonable foreseeable upset and accident conditions are discussed in detail in Section 4.8 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to the routine transport, use, or disposal of hazardous materials and reasonable foreseeable upset and accident conditions; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.8 of the FEIR Volume 3, exposure to hazardous materials during the operation of the on-site uses may result from (1) the improper handling or use of hazardous substances; (2) transportation accidents; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individual or environment affected.

Truck-Related Risks. The regulation of the transport of hazardous materials on State highways is governed by the United States Department of Transportation (USDOT), as described in Title 49 of the Code of Federal Regulations and by Title 13 of the California Code of Regulations. Appropriate documentation for all hazardous waste that is transported in connection with Project site activities would be provided as required by hazardous materials regulations. Hazardous waste produced on site is subject to requirements associated with accumulation time limits, proper storage locations and containers, and proper labeling. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company, which must ship hazardous waste

to a permitted facility for treatment, storage, recycling, or disposal. Compliance with applicable regulations would reduce impacts associated with the use, transport, storage, and sale of hazardous materials. The enforcement of applicable local, State, and Federal standards, ordinances, and regulations will ensure that potential impacts associated with environmental and health hazards related to an accidental release of hazardous materials are less than significant and no mitigation is required.

Freeway Accident Risks. According to the California Department of Transportation's Traffic Accident Surveillance and Analysis System (TASAS) report, there are approximately 105 accidents per year along a 3.75-mile stretch of SR-60 between Nason Street and Gilman Springs Road in the general vicinity of the Project area. The data were derived for the three-year span of January 1, 2008, to December 31, 2010. During this period, there were 316 accidents (average of 105 per year) along SR-60 (both westbound and eastbound). Of the 316 accidents, approximately 15.8 percent involved trucks (tractor/trailer). There were 127 eastbound accidents (19 or 15% involving trucks) and 189 westbound accidents (31 or 16.4% involving trucks). It is possible that congestion on the freeway might result in some WLC Specific Plan-related trucks exiting the freeway at off-ramps other than Theodore Street, or attempting to enter the freeway at on-ramps if the drivers see or hear on their radios that the freeway is congested. In most instances, drivers will use the shortest route indicated on GPS system maps or the route(s) they have used previously, regardless of traffic conditions at the time. In addition, due to the type of uses planned within the WLC Specific Plan, much of the Project-related traffic will be accessing the WLC site during off-peak times, so the chances of congestion or accidents occurring during the time they are accessing the site would be reduced. The accident database contains no information on whether the truck was the cause of a particular accident or the time of day, the vehicles involved, if hazmat spills occurred, if trucks or other vehicles detoured off the freeway, etc. Without these data, it is overly speculative to extrapolate any particular conclusions. Despite the lack of specific evidence regarding freeway accidents, it is reasonable to conclude that potential environmental impacts in this regard will be less than significant given the regulation of truck traffic on freeways according to State and Federal laws, and truck restrictions on local streets according to the City's Municipal Code (i.e., truck route enforcement) and no mitigation is necessary.

Land Use-Related Hazmat Risks. Both the Federal Government and the State of California require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials, to submit an Hazardous Materials Business Emergency Plan (HMBEP) to the local Certified Unified Program Agency (CUPA). The CUPA with responsibility for the City of Moreno Valley is the County of Riverside Community Health Agency, Department of Environmental Health. The HMBEP must include an inventory of the hazardous materials used in the facility, and emergency response plans

and procedures to be used in the event of a significant or threatened significant release of a hazardous material. The HMBEP must also include the Material Safety Data Sheet for each hazardous and potentially hazardous substance used. The Material Safety Data Sheets summarize the physical and chemical properties of the substances and their health impacts. The plan also requires immediate notification to all appropriate agencies and personnel of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information of all company emergency coordinators of the business, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel.

HMBEPs are designed to be used by responding agencies, such as the Moreno Valley Fire Department, to allow for a quick and accurate evaluation of each situation for an appropriate response. HMBEPs are also used during a fire to quickly assess the types of chemical hazards that firefighting personnel may have to deal with, and to make decisions as to whether or not the surrounding areas need to be evacuated. Compliance with existing law will ensure that no significant impacts pertaining to the creation of hazards affecting the public will occur. The handling of hazardous materials in accordance with the HMBEP as required by applicable local, State, and Federal standards, ordinances, and regulations will ensure that impacts associated with environmental and health hazards related to an accidental release of hazardous materials are less than significant and no mitigation is required.

Though the uses in the Project area are not expected to utilize acutely hazardous materials in their daily operation, a potential for an accidental release of hazardous materials into the environment is present at the Project site as it is at any commercial, retail, or industrial site. Compliance with the identified State and Federal transportation safety standards will govern the handling of hazardous materials during truck and freight transfer operations. These standards include procedures to contain, report, and remediate any accidental spill or release of hazardous materials. The handling of hazardous materials in accordance with all applicable local, State, and Federal standards, ordinances, and regulations will ensure that impacts associated with environmental and health hazards related to an accidental release of hazardous materials at the Project site will be less than significant and no mitigation is required.

Hazardous On-site Facilities. The Project site contains a regional natural gas compressor station operated by SDG&E. At present, the plant occupies a 19-acre site, surrounded by 174 acres of SDG&E-owned open space. There is additional open space around the plant, consisting of land owned by the CDFW as part of the SJWA. There are no plans to expand or otherwise modify the plant and/or its open space zone, which is considered adequate at this time to protect public health and safety, including users of the SJWA and new employees and users of the new warehouses associated with the WLC Specific Plan.

There will be sufficient setback from the plant to future warehouse uses (e.g., 1,000 feet). No development or change in operation has been announced for the property within the SJWA. Existing safety conditions will continue relative to the gas facility as it relates to the SJWA. Compliance with established safety laws and regulations regarding the natural gas facilities will reduce the potential impact to a less than significant level and no mitigation is required.

The Southern California Gas Company (SCGC) operates a natural gas metering station on a one-acre site located one-quarter mile north of the Moreno Compressor Plant. The land plan will provide 1,000 feet setback from the SCGC station as an additional setback between these uses. These setbacks appear sufficient to protect future uses/users within the WLC Specific Plan if upset conditions were to occur at this station. Compliance with established safety laws and regulations regarding natural gas plants is expected to reduce this potential impact to a less than significant level and no mitigation is required.

The site also contains two natural gas lines that cross the central and southern portions of the site in an east-west direction. They range in size from 16 to 36 inches in diameter and carry natural gas under medium and high pressure. As development occurs in areas with buried natural gas lines, the Project proponent will be required to negotiate with the involved utility provider as to whether these pipelines can be relocated or need to be protected in place. Future development is required to maintain clearance for pipelines depending on their contents and size, in consultation with the serving utility provider. As long as these design restrictions are implemented during the site design and construction process, no significant impacts are expected. However, if a catastrophic accident were to occur involving one or more natural gas lines on site, there could be property damage and loss of life. While the chance of occurrence is low, there are potential safety risks, mainly to Project employees, if such an accident were to occur. Compliance with established safety laws and regulations regarding pipelines is expected to reduce this potential impact to a less than significant level and no mitigation is required.

Off-site Improvements. A number of off-site improvements will be needed to serve the Project, including three reservoirs, various water, sewer, and drainage improvements within existing rights-of-way, and the SR-60/Theodore Street interchange. None of these facilities is expected to create significant hazards or risks to public health or safety. These facilities will require standard improvement plan approvals through the City of Moreno Valley and/or County of Riverside. Based on these plan reviews, no significant hazard-related impacts are expected and no mitigation is required.

Hunting Accidents. Immediately south of the Project area is the SJWA, where limited hunting is permitted. Hunting in these areas requires a hunting license issued by the State. The Fish and Game Code provides strict regulations on hunting, including limits on hours, time of year, quantity, and firearms.

Hunting on State lands, such as the SJWA, can only be done with shotguns that are smaller in size (higher in gauge) than 10-gauge shotguns. In addition, Federal law allows no more than three shells in the chamber of the shotgun at any given time during hunting. The SJWA is patrolled by CDFW wardens to ensure that all hunting rules and regulations are followed. The private hunt clubs are also governed by similar rules and regulations to ensure the safety of their members and the general public.

Given the proximity of the Project area to the nearby hunting areas, it is appropriate to consider the possibility of stray gunfire as a possible risk to future employees, visitors, and facilities on the Project site. Accident conditions that could arise from the nearby hunting activities are expected to be less than significant for the following reasons: the most intensive operations at the high-cube logistics center would be during off-peak hours when there is no hunting; the hunting on the adjacent areas to the south of the WLC Project area is in accordance with all applicable local, State, and Federal standards and regulations; and the range for the allowed firearms (shotguns smaller than 10-gauge) would be 60 yards or less providing a safe distance for development to occur in the WLC Project area, which would be a safe distance from the actual hunting areas. It should also be noted that the Specific Plan provides for a minimum 250-foot setback along the southern boundary of the Specific Plan property, which is greater than the minimum safe distance described above. Impacts are less than significant and no mitigation is required.

Valley Fever. During processing of the Highland Fairview Corporate Park EIR, a local resident expressed concern regarding Valley Fever (*Coccidiomycosis*), a disease caused by fungus spores (*Coccidioides immitis*). The WLC Specific Plan site is adjacent to the Highland Fairview Corporate Park site. These fungal spores most typically lie dormant in relatively undisturbed soil with native vegetation cover in the Central Valley of California.

The likelihood of these spores to occur at this site is remote. The soil at the Project site is not undisturbed and has little, if any, native vegetation cover. The site consists primarily of disturbed agricultural soils (i.e., regularly tilled and occasionally irrigated) and had virtually no native vegetative cover. The local soils will be extensively disturbed during grading and would be regularly watered to control dust. Erosion control measures will be implemented immediately following grading. Under these conditions, it is unlikely that *Coccidioides immitis* spores would survive in the soil. This potential impact appears minimal and no mitigation is required. (FEIR, Volume 3 pgs. 4.8-16 to 4.8-20).

d. Located on a List of Hazardous Materials Sites

Potential Significant Impact: Whether the Project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

Findings: Potential impacts of the Project related to being located on a hazardous materials site is discussed in detail in Section 4.8 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to development occurring on a hazardous materials site; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.8 of the FEIR Volume 3, the Project area is not listed in any of the searched regulatory databases provided by Environmental Data Resources (EDR). This included a review of Federal, State, and local environmental databases for information pertaining to documented and/or suspected contaminated sites, known handlers or generators of hazardous waste, waste disposal facilities, releases of regulated hazardous substances and/or petroleum products within specified search distances. Analysis of soil samples obtained during the limited site characterizations conducted as part of the Phase I Environmental Site Assessments (ESAs) indicated there were trace concentrations of pesticides present in near surface soils at some of the sample locations. However, the pesticide concentrations were below the EPA's Preliminary Remediation Goals, for residential properties. No further sampling was deemed necessary and unrestricted use of the property is warranted. Since neither the Project site nor areas in the vicinity of the Project site are listed on any of the hazardous materials sites as defined by Government Code Section 65962.5, there would be a less than significant impact and no mitigation is required. (FEIR, Volume 3 pg. 4.8-20)

e. Conflict with Emergency Response Plans

Potential Significant Impact: Whether the Project would impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation

Findings: Potential impacts of the Project related to emergency response plan conflicts are discussed in detail in Section 4.8 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to emergency response plan conflicts; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.8 of the FEIR Volume 3, the City of Moreno Valley adopted its Local Hazard Mitigation Plan (LHMP) on October 4, 2011. This document identifies

known hazards throughout the community and identifies strategies for which to prepare for and respond to these hazards if and when it is necessary. Figure 12-2 of the LHMP maps primary and alternative evacuations routes out of Moreno Valley. There are three (3) routes that either run through or along the Project area that are identified as primary evacuation routes: Redlands Boulevard, Theodore Street, and Alessandro Boulevard. The Project will be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate emergency access and evacuation will be provided. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Compliance with existing regulations for emergency access and evacuation will ensure that impacts related to this issue are less than significant and no mitigation is required. (FEIR, Volume 3 pg. 4.8-21)

f. Wildland Fire Risk

Potential Significant Impact: Whether the Project would expose people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Findings: Potential impacts of the Project related to wildland fire risk are discussed in detail in Section 4.8 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to wildland fire risk; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.8 of the FEIR Volume 3, The City of Moreno Valley is subject to both wildland and urban fires. Wildfires in particular pose a threat to the northern and eastern portions of the City, near the WLC Project area. Moreno Valley's LHMP documents that three wildland fires have occurred within the WLC Project area since 2003. Although the Project area is not within a mapped fire hazard area, the Badlands directly east of the Project area are considered a High Fire Hazard Area. Development of the eastern portion of the Project could expose persons or property to wildland fire risks given the proximity of the Project area adjacent to a High Fire Hazard Area. Regardless of this proximity, all new structures in the Project area must be constructed in compliance with Title 24 of the California Code of Regulations to safeguard life and property from fire hazards, including the installation of automated fire suppression systems. Compliance with these standards would be enforced during building permit review and the construction inspection period. In addition, no development will be allowed within the San Jacinto Fault Zone, which runs parallel and just west of

Gilman Springs Road; this area of limited development will provide a fuel or fire break to help protect future occupied uses within the WLCSP.

Six fire stations presently serve the City of Moreno Valley. Station No. 58, the Moreno Beach station, is the closest station to the Project area (approximately a quarter of a mile directly west). Given the proximity of Station No. 58 and with all new structures constructed in compliance with Fire and Building code regulations, the susceptibility and exposure of the Project to wildland fires would be limited. (FEIR, Volume 3 pg. 4.8-21)

g. Cumulative Hazards and Hazardous Materials Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would have a cumulative hazards and hazardous materials significant.

Findings: Potential cumulative impacts of the Project related hazards and hazardous materials are discussed in detail in Section 4.8 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts related to hazards and hazardous materials; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.8 of the FEIR Volume 3, the cumulative impact analysis considers development of the Project in conjunction with other development in the City and this portion of Riverside County. Significant cumulative impacts associated with the routine transport, use, and disposal of hazardous materials would occur as the Project would increase the amount of truck traffic in the area as well as the number of trucks potentially transporting hazardous materials. The Project, in combination with other projects of a similar nature, has the potential to create a significant cumulative impact related to this issue. Some of these risks are site-specific and localized, such as businesses that handle hazardous materials within their facilities (i.e., on site); these types of hazmat impacts are generally limited to the Project site. It is also possible there will be incrementally increased impacts by the transport and disposal of hazardous materials related to warehouse operations on the Project site. For example, the substantial increase in trucks in and around the WLC site would incrementally increase the risks of accidents involving truck-related fuels (e.g., fire or explosion). However, the number of trucks containing hazardous materials on the road in a given area at any given time would be difficult if not impossible to calculate, and it would be likewise difficult to estimate the number and/or location of accidental spills and leaks, which, by their nature, are accidental or unplanned occurrences, it would be impossible to predict the specific occurrence of such events on the Project site.

Despite these uncertainties, it is reasonable to assume that with an increase in vehicles transporting hazardous materials would incrementally increase the potential for accidents on a regional basis.

As anticipated in the City's General Plan, demographic increases, and the availability of vacant property in the City would lead to the new industrial development in the City and surrounding area. While the project-specific hazardous material impacts of individual development projects will be addressed separately in future CEQA documents, anticipated future development will contribute, through increases in population and the number of outlets that transport, or dispose of hazardous materials, to a cumulative increase in risk for hazardous material incidents. Although each project has unique hazardous materials considerations, it is anticipated that future cumulative projects would comply with the local, State, and Federal regulations and requirements as these are required for all development projects. As a result, cumulative impacts associated with hazardous materials would be less than significant.

Cumulative impacts involving wildfires consists of future development adjacent to a High Fire Hazard Area. The risk to each future project is based on the location and interface between urbanized area and wildland areas. The risks associated with development in these area can only be reduced through conformance with Fire and Building Code regulations, it is anticipated that cumulative development within the Project area would not create a significant and cumulative impact associated with wildland fire hazards. (FEIR, Volume 3 pgs. 4.8-23 through 4.8-24)

8. Hydrology, Drainage, and Water Quality

a. Seismic Flooding-Related Impacts

Potential Significant Impact: Whether the Project would expose people or structure to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

Findings: Potential impacts of the Project related to seismic flooding-related impacts are discussed in detail in Section 4.9 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to seismic flooding-related impacts; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.9 of the FEIR Volume 3, the Project's off-site improvement areas are not identified as being located within the City's mapped dam inundation area; therefore, the Project would not result in the exposure of people or structures to risk of loss, injury, or death involving flooding as a result of failure of either the Poorman Reservoir (Pigeon Pass Dam) or Lake Perris Dam. Impacts related to this issue would be less than significant, and no mitigation is required. (FEIR, Volume 3 pg. 4. 9-27 to 4.9-28)

b. Seismic-Related Impacts

Potential Significant Impact: Whether the Project would expose people or structure to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

Findings: Potential impacts of the Project related to seismic-related impacts are discussed in detail in Section 4.9 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to loss, injury, or death involving inundation by seiche, tsunami, or mudflow; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.9 of the FEIR Volume 3, the Project area is not at risk of inundation by a tsunami as it is located approximately 56 miles from the Pacific Ocean. The Project area is located approximately 2.5 miles northeast of Lake Perris. Lake Perris is an enclosed body of water and could be subject to a seiche during a seismic event. However, a seiche event would not affect the Project area because water levels in the lake are not high enough to overtop the Perris Dam in the event of a seiche.¹ The Perris Dam has been designed to prevent seiche phenomena due to the region's high seismicity. In addition, the topography between the Specific Plan area and Lake Perris has multiple hills and valleys. Given these factors, impacts associated with seiche events are less than significant for the WLC Project.

Except for the far southwest corner, the Project site is located in a gently sloping area where landslides and mudslides would not occur. No development is proposed on the steep slopes of Mount Russell in the southwesterly portion of the property, which is included in the 74.3 acres of open space designated within the WLC Specific Plan. Therefore, a less than significant impact associated with exposure of people or structure to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow would occur, and no mitigation is required. (FEIR, Volume 3, pgs. 4.9-28).

c. Groundwater

Potential Significant Impact: Whether the Project would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Findings: Potential impacts of the Project related to groundwater impacts are discussed in detail in Section 4.9 of the FEIR Volume 3. Based on the entire record before us, this Council finds that

¹ The existing earthen wall is approximately 128 feet high with the highest elevation at 1,628 feet. Normal operating water levels for Lake Perris are at 1,588 feet (leaving 40 feet of excess height between the water level and the top of the dam). Restricted operating water levels for Lake Perris are at 1,563 feet (leaving 65 feet of excess height between the water level and the top of the dam).

development of the Project will not result in significant impacts related to interference with groundwater recharge resulting in a net deficit in aquifer volume or lowering of the local groundwater table; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.9 of the FEIR Volume 3, based on the Water Supply Assessment (WSA) prepared for the Project by the Eastern Municipal Water District (EMWD), water demand for the proposed on-site uses would total approximately 1,991.25 acre-feet per year (AFY).² The EMWD considers this a worst-case estimate based on the total acres and amount of square footage of high cube logistics uses proposed by the Project. This estimate does not take into account the Project landscaping design with xeriscape drought-tolerant landscaping and on-site collection of runoff and channeling it to landscaped areas to minimize irrigation on the interior of the Project site. The Project will obtain water service from the EMWD. It is anticipated that the Project would primarily utilize imported water purchased from Metropolitan. In the event that the supply of imported water is reduced, it would be supplemented with new local supply projects during multiple dry years, if needed. The WSA prepared for the Project indicates that development of the Project will not include groundwater for water supply. Rather, this Project, as well as other new developments in the EMWD's service area, will be supplied exclusively with imported water provided by Metropolitan. The imported water may be treated by Metropolitan, provided by Metropolitan as untreated water and subsequently treated by the EMWD, or recharged into the basin for later withdrawal.

The Project will not substantially interfere with groundwater recharge due to the Project implementation of bioretention areas and detention basins with infiltration capacity that mitigates the impact of reduced pervious areas. Bioretention areas and detention basins will be implemented in addition to the remaining impervious areas. The only use of groundwater may be to support continued agriculture on portions of the WLC Specific Plan property that have not yet been developed. The EMWD developed the West San Jacinto Groundwater Basin Management Plan (Plan) to help ensure that local groundwater resources are conserved and groundwater overdraft does not occur, based on projections of future growth and expected water supply conditions. The Plan projects the water consumption demands of existing and future development based on rates of growth assumed by regional planning organizations (i.e., SCAG and WRCOG) and estimates water demand versus available supply under different water supply scenarios (e.g., multiple dry years).

² *Water Supply Assessment Report for the World Logistics Center Specific Plan in Moreno Valley*, Eastern Municipal Water District, March 21, 2012.

Based on the State Water Supply analysis provided in the EIR, the WLC Project is not expected to interfere with groundwater recharge activities or groundwater supplies. Impacts associated with this issue are less than significant, and no mitigation is required. (FEIR Volume 3 pg. 4.9-28 to 4.9-31).

d. 100-Year Flooding Impacts

Potential Significant Impact: Whether the Project would place within a 100-year flood hazard area structures that would impede or redirect flood flows or place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map .

Findings: Potential impacts of the Project related to 100-year flood events are discussed in detail in Section 4.9 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts related to 100-year flooding events; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.9 of the FEIR Volume 3, the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) identify areas subject to flooding during the 100-year storm.³ Based on these FIRM maps, the Project site does not fall within a 100-year flood zone.⁴ Because the Project site does not lie within a 100-year floodplain impacts related to this issue are less than significant. No mitigation is required. (FEIR Volume 3 pg. 4.9-31 to 4.9-32).

e. Hydrology and Water Quality Cumulative Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would have significant cumulative impacts on hydrology and water quality.

Findings: Potential impacts of the Project related to cumulative hydrology and water quality impacts are discussed in detail in Section 4.9 of the DEIR. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts to hydrology and water quality and, therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.9 of the DEIR, increases in the amount and extent of development in the City and surrounding areas will increase the potential for pollutants in runoff, which in turn would affect water quality. The Project's water quality impacts will be mitigated through on-site detention/sedimentation basins and other water pollution control mechanisms such as

³ The term "100-year" is a measure of the size of the flood, not how often it occurs. The "100-year flood" is a flooding event that has a one percent chance of occurring in any given year.

⁴ FEMA DFIRM Data, 2008.

vegetated swales, sand filters, and storm drain inlet filters. Similar requirements will be placed on all other development in the Project vicinity by the City and the RWQCB, further reducing the potential for cumulative impacts. Since all development within the City is required to account and mitigate for their individual water quality impacts before runoff leaves each individual site, it is reasonable to conclude that water quality would be maintained throughout the cumulative area. Adherence to NPDES, SWPPP, and WQMP requirements will reduce any such cumulative water quality impact to a less than significant level.

Groundwater recharge policies and practices implemented by the RWQCB and local agencies will ensure groundwater supplies are maintained at appropriate levels. As such, no significant cumulative groundwater supply impacts are anticipated to occur with the development of the Project.

The drainage system for the Project would be designed so that runoff from the Project site after Project development is directed to on-site treatment BMPs and flow volumes would be equal to or less than historic conditions at any given discharge location. This same requirement will be placed on all other development in the vicinity of the Project site by the City of Moreno Valley. Therefore, the Project will not make a significant contribution to any cumulatively considerable impacts related to drainage or water quality and no mitigation is required. (DEIR Volume 3, pgs. 4.9-65)

9. Land Use and Planning

a. Conflict with Any Applicable Habitat or Natural Community Conservation Plan

Potential Significant Impact: Whether the Project would conflict with any applicable habitat conservation plan or natural community conservation plan.

Findings: Potential impacts of the Project related to the conflict with any applicable habitat conservation plan are discussed in detail in Section 4.10 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts due to a conflict with any applicable habitat or natural community conservation plan; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.10 in the FEIR Volume 3, the Project site is located within the MSHCP area, Mead Valley and Reche Canyon/Badlands Plan Area.⁵ Portions of the Project area occur in 14 criteria cells of the MSHCP. The Project site is not located within any special linkage areas identified by the MSHCP. The Project applicant, the City, and the County⁶ are required to

⁵ *Multiple Species Habitat Conservation Plan Compliance Report*, Michael Brandman Associates. April 23, 2012.

⁶ Western Riverside County Regional Conservation Authority (RCA)

use the Joint Project Review (JPR) process established in the MSHCP to identify and acquire habitat as part of the development review process. The JPR process involves negotiations between a landowner and the Western Riverside County Regional Conservation Authority (RCA) so the County can acquire land with important habitat or other biological resources while providing fair compensation and/or reasonable development opportunities on the remaining land for the landowner.

The Project site is located within areas requiring burrowing owl surveys, within the MSHCP Criteria Area Species Survey Area (CASSA), and Narrow Endemic Plant Species Survey Area (NEPSSA). Because the Project site is within an MSHCP CASSA and is considered to be a covered activity, the Project is subject to provisions of the MSHCP. In particular, the Project proponent will be required to provide payment of mitigation fees and adhere to the Best Management Practices found in Appendix C of the MSHCP. Pursuant to agreements with the U.S. Fish and Wildlife Service (USFWS) and the CDFW, the payment of the mitigation fees and compliance provisions of the MSHCP provides full mitigation under CEQA, the Federal Endangered Species Act (FESA), and the California Endangered Species Act (CESA) for impacts to the species and habitats covered by the MSHCP. Since the City has adopted the MSHCP and its requirements and provisions, and since the Project is within Moreno Valley, the WLC Project would be required to adhere to applicable MSHCP requirements and fees. Therefore, the WLC Project was determined to be consistent with the MSHCP. (FEIR Volume 3 pgs. 4.10-11 to 4.10-12)

b. Conflict with Applicable Land Use Plans, Policies, or Regulations (Regional)

Potential Significant Impact: Whether the Project would conflict with any applicable regional land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to, the General Plan, Specific Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Findings: Potential impacts of the Project related to the conflict with any applicable land use plans, policies, or regulations are discussed in detail in Section 4.10 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant impacts due to a conflict with any applicable regional land use plan, policies, or regulations; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.10 in the FEIR, Volume 3, pursuant to *CEQA Guidelines* Section 15125 (d), the Project's EIR includes an evaluation of the consistency of the WLC Project with pertinent goals and policies of relevant adopted local and regional plans. The analysis

evaluates the Project against all the applicable regional planning documents and processes which include: airport regulations associated with MARB and Riverside County Airports; Southern California Council of Governments' (SCAG) 2008 Regional Comprehensive Plan (RCP), Regional Transportation Plan (RTP), and Compass Growth Vision; SCAG's 2012 RTP and Sustainable Communities Plan, Santa Ana Water Quality Control Plan (Basin Plan; Riverside County Drainage Area Management Plan (DAMP); and EMWD's Urban Water Management Plan (UWMP).

The analysis in the EIR demonstrates that the Project is generally consistent with the goals of SCAG's Regional Comprehensive Plan, Compass Plan and Regional Transportation Plan in that it seeks to add employment in an area that has historically been "jobs poor," which will help reduce worker commute trips from Moreno Valley over the long term. The WLC Specific Plan Project is generally consistent with these plans because the WLC Specific Plan will generate fewer emissions than the currently approved Moreno Highland Specific Plan, and it will provide for a better balance of jobs versus housing in Moreno Valley, which will incrementally improve regional commuting directions and distances by providing almost 24,000 new jobs (direct, indirect and induced) in an area currently planned for housing. No other conflicts with the applicable plans were identified. (FEIR Volume 3 pgs. 4.10-12 to 4.10-26).

c. Conflict with Applicable Land Use Plans, Policies, or Regulations (Local)

Potential Significant Impact: Whether the Project would conflict with any applicable local land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to, the General Plan, Specific Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Findings: Potential impacts of the Project related to the conflict with any applicable local land use plans, policies, or regulations are discussed in detail in Section 4.10 of the FEIR Volume 3. The Project will advance many of the goals, objectives and policies contained in the various elements of the City's General Plan. It will add significant employment opportunities, facilitate significant economic growth, establish well-planned attractive new development, establish a broader and more stable tax base for the City, expand recreational trail systems, increase permanent open space, provide for alternative forms of transportation, implement extensive sustainable design features and advance the progress of the City's annexation program. These are specifically identified and discussed in the Findings and Statement of Overriding Considerations (Section VI of this document) including statements about how the Project helps the City to achieve these goals, objectives and policies.

Facts in Support of the Findings: According to Section 4.10 in the FEIR Volume 3, the Project proposes to amend the existing City of Moreno Valley General Plan Land Use Plan for the Project area. By definition, the Project is inconsistent with the existing General Plan and approval of the Project would correct the inconsistency by amending the General Plan Land Use and other Elements to be consistent with the WLC Project and Specific Plan.

In summary, the Project is consistent with the goals, objectives, and policies of the City of Moreno Valley General Plan, except Objective 2.1 and Community Development Policy 2.5.2. As proposed, the Specific Plan represents a fundamental land use change for the Rancho Belago area, the eastern portion of Moreno Valley.

The land is currently planned for a mixed-use residential community, but the WLC Project will introduce 40.6 million square feet of logistics warehousing onto existing agricultural land that is adjacent to existing residential uses to the west and the San Jacinto Wildlife Area to the south.

Housing Element. During the NOP period, several group representatives expressed concern that the WLC Specific Plan would eliminate 7,700 housing units in the Moreno Highlands Specific Plan that would have to be replaced elsewhere in the City. The City adopted an updated Housing Element in February 2011 identifying the Moreno Highlands area as a potential location for future jobs-producing land uses rather than housing (affordable or otherwise).

The 2011 Housing Element update indicated the Moreno Highlands area would likely be rezoned to support employment-generating uses rather than housing. It also stated that “pursuing any land use changes with the Moreno Highlands Specific Plan area will not hinder the City’s ability to meet its Regional Housing Needs Allocation (RHNA) obligations.” The term RHNA refers to the Regional Housing Needs Allocation (affordable housing allocations) from the SCAG. The State Department of Housing and Community Development (HCD) certified the City’s Housing Element on May 31, 2011.

In April 2011 and April 2013, the City adopted its Economic Development Action Plan, which also identified the eastern part of the City as a potential area for major job-producing land uses. The *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California* (“Study”) prepared by David Taussig & Associates, Inc., in 2014 concluded that the WLC Project would generate 24,000 jobs/employees to the area, which includes the creation of direct, indirect, and induced jobs/employees to the City. (FEIR, Volume 3, Appendix O)

The City’s 2006 Housing Element identified the Moreno Highlands Specific Plan as a potential source of vacant land that could accommodate possible future residential growth in the City. However, in 2011 the

City updated its Housing Element and (i) anticipated possible land use changes from mixed use and residential to jobs producing warehouses in the eastern part of the City, and (ii) concluded that redesignating the entire land east of Redlands to the eastern City border for warehouse uses would not impede the City's Housing Element Objectives. The HCD certified the City's Housing Element as compliant with State law on May 31, 2011. In February 2014, the Housing Element was updated again, however this update did not include any changes relating to the Moreno Highlands property. This means that approval of Project will not impede the City's housing goals as set forth in its Housing Element, and no mitigation is required. (FEIR Volume 3 pgs. 4.10-27 to 4.10-35).

d. Cumulative Land Use Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and foreseeable future projects would result in cumulative land use impacts.

Findings: Potential impacts of the Project related to cumulative land use impacts are discussed in detail in Section 4.10 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts related to land uses; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.10 of the FEIR Volume 3, the WLC Project would not have significant Project-related impacts related to conflicts with applicable land use plans, policies, or regulations with approval of the General Plan Amendment, or conflict with an approved habitat conservation plan. While the Project would represent a shift in land use policy for the eastern portion of the City, this policy shift does not represent a significant cumulative land use impact under CEQA. The EIR determined the Project would have significant land use impacts on existing rural residences ("dividing an established community"), but this conflict does not rise to the level of a cumulative impact since the potential land use impacts to all adjacent residences will be less than significant. (FEIR Volume 3 pg. 4.10-36 and 4.10-37).

10. Mineral Resources

a. Loss of Statewide, Regional, or Locally Important Mineral Resources

Potential Significant Impacts: Whether the Project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State or result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plans.

Findings: Potential impacts of the Project relating to mineral resources are discussed in detail in Section 4.11 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to mineral resources will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.11 of the FEIR Volume 3, lands within the City of Moreno Valley and its Sphere of Influence are designated Mineral Resources Zone-3 (MRZ-3) and MRZ-4, which are not defined as significant mineral resource areas. No sites have been designated as locally-important mineral resource recovery sites on any local plan.⁷ In addition, Figure OS-5 of the Riverside County General Plan shows that the Project area is also located within MRZ-3. The development of the Project site would not result in the loss of identified regional or local mineral resources, conversion of an identified mineral resource use, or conflict with existing mineral resource extraction activities. Therefore, the development of the Project site would not result in a loss of statewide, regional, or locally important mineral resources. No impacts associated with this issue would occur and no mitigation is required. (FEIR Volume 3 pg. 4.11-3).

b. Cumulative Mineral Resource Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and foreseeable future projects would incrementally affect mineral resources.

Findings: Potential impacts of the Project related to cumulative mineral resource impacts are discussed in detail in Section 4.11 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts related to mineral resources; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.11 of the FEIR Volume 3, the cumulative area for mineral resources is the City of Moreno Valley and this part of western Riverside County. As population levels increase in the region, greater demand for aggregate and other mineral materials will be placed on mineral resources, especially sand and gravel. Similarly, development pressures in areas where these materials are known or expected to occur would result in the loss of availability of these mineral resources. However, because the Project site is not identified as a significant source of sand/gravel deposits and development subsequent to the adoption of the land use actions on any of the sites would not decrease the local or regional availability of mineral resources, potential future development of any of the

⁷ Section 6.10 Mineral Resources, Section 6.0 Issues Found Not To Be Significant, Draft Environmental Impact Report for City of Moreno Valley General Plan 2030, State Clearinghouse #2004031135, City of Moreno Valley, October 2004.

sites would have no significant cumulative mineral resources impact. (FEIR Volume 3 pg. 4.11-3 and 4.11-4).

11. Noise

a. Ground-Borne Vibrations

Potential Significant Impact: Whether the Project would result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

Findings: Potential impacts of the Project relating groundborne vibration and groundborne noise are discussed in detail in Section 4.12 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to ground-borne vibration and groundborne noise will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.12 of the FEIR Volume 3, roadways in the vicinity of the Project area are either paved or would be paved as the area develops, and would not result in Project traffic driving over rough or dirt roads. Well maintained roads typically do not result in substantial vibration levels. Even roads with irregularities typically only generate substantial levels of vibration very near, less than 50 feet from the irregularity. Construction activities that would occur within the WLC Specific Plan area are not anticipated to require blasting or pile driving. Roadway vibrations are typically not perceptible more than 50 feet from the roadway except in very unusual circumstances. Generally, the interface between the soft tire of a truck or automobile will not generate significant vibration unless the road is in poor shape (e.g., potholes or pavement joints) Therefore, impacts associated with this issue are anticipated to be less than significant, and no mitigation is required. (FEIR Volume 3 pg. 4.12-34).

b. Airport Noise

Potential Significant Impacts: Whether a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would results in exposure of people residing or working in the Project area to excessive noise levels or if a Project within the vicinity of a private airstrip, would expose people residing or working in the Project area to excessive noise levels.

Findings: Potential impacts of the Project relating to airport noise are discussed in detail in Section 4.12 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts

related to airport noise will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.12 of the FEIR Volume 3, the Project area is located approximately 5.5 miles northeast of the March Airfield (MAF) and is not located within two miles of a private airstrip. The MAF is a joint-use airport, used for both military and civilian purposes. The March Air Reserve Base (MARB) is the military operator of the MAF and March Inland Port (MIP) is the civilian operator of the airport. This facility is anticipated to play an increasingly important role in the transportation of goods and cargo for the Southern California region. Existing flight patterns affect a large portion of the City of Moreno Valley, along a path that affects the western portion of the City in a northwest/southeast alignment. Aircraft operations from the airport currently contribute intermittent single-event noise.

There is potential for single-event noise exposure levels from MAF activity to affect the Project. The exposure levels will vary dependent upon the type of aircraft and flight track flown for each operation at MAF. However, the Project is not identified as being within the noise or safety contours delineated for the MARB Airport.⁸ In addition, the Project is not considered to contain sensitive receivers and, therefore, the impacts from these single-event noise levels are considered to be below the level of significance. The City's exterior noise standard for industrial uses is 70 dBA CNEL. MAF noise levels are less than 60 dB CNEL within the Project area. Therefore, the Project would not have the potential to expose people to excessive noise levels from airport operations. Therefore, no significant noise impacts would occur regarding these issues from implementation of the Project, and no mitigation is required. (FEIR Volume 3 pgs. 4.12-35)

c. Cumulative Noise Impacts During Construction

Potential Significant Impact: Whether the Project in connection with past, current, and foreseeable future projects would incrementally result in excessive noise levels during construction.

Findings: Potential impacts of the Project related to cumulative noise impacts during construction are discussed in detail in Section 4.12 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts related to excessive noise levels during construction; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.12 of the FEIR Volume 3, construction crew commutes and the transport of construction equipment, and materials to the WLCSP area would

⁸ Figure 5.4-1 March Reserve Air Base Noise Impact Area, City of Moreno Valley General Plan EIR, July 2006.

incrementally increase noise levels on access roads leading to the site. Secondary sources of noise would include noise generated during excavation, grading, and building erection on the project site. The net increase in project site noise levels generated by these activities and other sources has been quantitatively estimated and compared to the applicable noise standards and thresholds of significance. Although it is not possible to predict if contiguous properties may be constructed at the same time and create cumulative noise impacts that would be greater than if developed at separate times, it is unlikely that adjacent properties will be developed at the same time as the Specific Plan area. However, in the unlikely event that adjacent properties are developed at the same time as the WLC Project, adherence to the City's Municipal Code provisions that regulate construction activities and other development standards would render the cumulative impacts of the Project to less than significant levels. (FEIR Volume 3 pg. 4.12-59).

d. Cumulative Operational On-site Noise Impacts on Sensitive Receptors

Potential Significant Impact: Whether the Project in connection with past, current, and foreseeable future projects would incrementally result in operational noise level impacts on adjacent sensitive uses, both existing and future.

Findings: Potential impacts of the Project related to cumulative operational noise level impacts on adjacent sensitive uses, both existing and future are discussed in detail in Section 4.12 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts related to operational noise level impacts on adjacent sensitive uses, both existing and future.

Facts in Support of the Findings: According to Section 4.12 of the FEIR Volume 3, the noise analysis contained in this section also provides an assessment of on-site operational noise level impacts on adjacent sensitive uses, both existing and future. Additionally, on-site operational noises are individual noise occurrences and are not typically additive in nature. It is extremely unlikely that adjacent properties will generate noises that would be additive in nature because of two important reasons. First, the noise sources would have to be adjacent or in close proximity to one another in order for the noises to intermingle. Second, the sensitive receptor or receptors would also have to be adjacent to or in close proximity to the noise generators. Although it is not possible to predict if contiguous or proximate properties may generate noise at the same time that would be additive in nature and thus create a significant cumulative noise impact at sensitive receptors, adherence to the City's Municipal Code provisions that regulate nuisance noise from land uses and other development standards would render the cumulative impacts of the Project to less than significant levels. (FEIR Volume 3 pg. 4.12-59).

12. Population and Housing

a. Population Growth

Potential Significant Impact: Whether the Project would induce substantial population growth in an area, either directly (e.g., new homes and businesses) or indirectly (e.g., extension of roads and infrastructure).

Findings: Potential impacts of the Project related to population growth are discussed in detail in Section 4.13 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to population growth will occur as a result of development of the Project and, therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.13 of the FEIR Volume 3, population projections developed by SCAG estimate the City's population will reach approximately 213,700 persons by the year 2020 and approximately 255,200 persons by the year 2035. The extent to which the new jobs created by a Project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a Project. Construction of the WLC Project will create short-term construction jobs. These short-term positions are anticipated to be filled by workers who, for the most part, reside in the Project area; therefore, construction of the WLC Project will not generate a permanent increase in population within the Project area.

An economic study of the Project prepared by DTA concluded that the WLC Project could generate up to 20,307 new direct on-site jobs within the City.⁹ In addition to the projected on-site job creation, the DTA study estimates the WLC Project could generate new off-site jobs (i.e., indirect/induced employment) in all industries of the economy. The DTA study also estimated that an additional 7,386 indirect/induced jobs could be created in the County, of which 3,693 jobs were projected to be within the City as a result of Project implementation. While the specific location of the potential additional indirect/induced jobs created within the County cannot be specifically determined, it is reasonable to assume that some percentage of these jobs will be support service jobs and are likely to be located in the WLC Project vicinity, and therefore the City.

The WLC Project does not include a residential component. The WLC Project is located within an area that is currently largely vacant and planned for a mix of residential, commercial, business park, and open space land uses in accordance with the General Plan Community Development Element. The WLC

⁹ David Taussig and Associates, Inc. (DTAA). Fiscal and Economic Impact Study, Draft dated March 13, 2012, revised report dated January 15, 2013 February 5, 2014.

Project includes a General Plan Amendment to change the existing mix of land use designations to Business Park/Light Industrial (BP).

If approved, the WLC Specific Plan would supplant the approved Moreno Highlands Specific Plan (MHSP) Project west of Gilman Springs Road that did have a residential component. The EIR for that project indicated it would have increased the City's population by 17,019 persons over 15 years (7,736 units \times 2.2 persons/unit). However, because the City is considered housing rich (and jobs poor) by SCAG, the loss of that projected population growth is not considered a significant impact and, in fact, a number of State policies (e.g., SB 375) encourage the creation and development of jobs-producing development in areas with poor jobs/housing numbers such as that which exists in the City.

Currently, there are seven single-family homes in various locations on the property along with associated ranch/farm buildings. Streets, water and sewer utilities, and municipal services would be extended to serve the WLC Project. The WLC Project may benefit other development projects in the Project area by the installation of infrastructure (e.g., roads and utilities), but is not expected to induce substantial population growth into the area since there would be no large areas of vacant land left in the east end of the City (south of SR-60) that could be developed with residential uses.

It should be understood that the actual eventual number of employees generated by the Project will vary depending on a variety of economic factors (e.g., actual companies that relocate and current hiring conditions). The projected employment estimate also does not take into account relocation of existing employees from other jurisdictions as a result of existing businesses relocating into the WLC Project. However, these would be counted as "new" employees for the City of Moreno Valley. For the purposes of this analysis, the EIR will use 20,307 direct employees working at the WLC or one employee per 2,000 square feet as a conservative estimate (in terms of environmental impacts) for future employment growth from WLC Specific Plan development.

The new employment opportunities resulting from development of the high-cube logistics warehouse and general warehouse uses will raise the City's current jobs-to-housing ratio by providing additional jobs to local residents. While the place of residence of the persons accepting employment provided by the proposed uses is uncertain, due to the City's projected jobs/housing ratio, it is reasonable to assume and therefore expect that some percentage of these jobs would be filled by persons already living within the City or Project area. Therefore, no significant increase in population of the City would result from the development or operation of the WLC Project, resulting in a less than significant impact associated with growth inducement and no mitigation is required.

Indirect City Population Impacts Related to Fiscal and Economic Changes. If the MHSP Project is not built, it could be argued the City may experience a financial impact from the loss of higher property tax, sales tax, and other revenues related to growth and development.

Potential economic impacts that may occur with Project implementation include permanent employment (direct on site and indirect/induced), permanent output (gross receipts; total direct output plus output produced by suppliers and employee spending), and one-time construction impacts.

The DTA study indicates that the creation of new jobs to the City will lead to more consumer spending by employees in existing retail establishments within the City, as well as new retail development that will be attracted to the City as a result of this spending. Job creation also results in increased tax revenues to the City through increased property taxes and sales taxes associated with development of the WLC Project. However, it is important to note that because of the difference in timing of the development of the various phases of the WLC Project, the number of employees summarized above will not be realized at the same time.

Development of the WLC Project is projected to create approximately 16,521 construction-related full-time equivalent (FTE) jobs within the City. Similar to recurring employment (i.e., permanent), it is likely that some percentage of these jobs will be associated with support services and are likely to be located in the vicinity of the WLC Project and therefore within the City.

The WLC Project does not include a residential component, so it would not directly generate additional new housing. Employees of the Project that choose to live in the City would likely utilize the existing supply of housing within the City.

Based on the potential increase in jobs (additional 20,307 direct jobs) within the City and no substantial increase in population as a result of the Project, the City's jobs-to-housing ratio would improve from the existing (2011) ratio of 0.47 to 0.91, thus achieving a greater jobs-to-housing balance within the City. Similarly, the potential new County employees that may be generated by the WLC Project would increase the total County employment to 571,799 from 551,492 resulting in a ratio of 0.74 from 0.69.

As development of the WLC Project is expected to occur over the course of many years, the jobs-to-housing ratio will not significantly change immediately. The City's current jobs-to-housing ratio is exceptionally low when compared to SCAG standards; therefore, the need for employment is immediate. A balance between jobs and housing within the City would have a positive impact by decreasing costs associated with commuting and traffic congestion. It also provides savings to consumers in the operation

and maintenance of automobiles, and saving to local public agencies in terms of the need to construct and maintain new road improvements.

Based on the foregoing discussion, implementation of the WLC Project would not result in a deficit in the City's General Fund even after City costs to provide public services to the development are considered. The estimated surplus is approximately \$5.7 million annually, which is about two times the projected annual City General Fund costs. Additionally, the WLC Project is expected to generate sizeable, substantial, and lasting employment, wages, output, and revenues for the City and region. Therefore, potential fiscal and economic changes that could affect the City's population or housing are considered to be less than significant, and no mitigation is required. (FEIR Volume 3 pgs. 4.13-11 to 4.13-17)

b. Displace Substantial Housing/People

Potential Significant Impact: Whether the Project would displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere.

Findings: Potential impacts of the Project related to displacement of housing or people are discussed in detail in Section 4.13 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to displacement of housing or people will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.13 of the FEIR Volume 3, the WLC Project site currently contains seven rural residences. At the City Council meeting on May 22, 2012, some of the existing residents stated that they did not want to be included in the Specific Plan. After deliberation, the Council decided to include the rural properties in the Specific Plan in the interest of comprehensive land planning for the WLC property. Upon approval of the Specific Plan, these properties can continue as non-conforming uses, and the WLC Specific Plan designates these properties as "Light Logistics" (LL), which allows for future industrial-related uses (vehicle storage, light assembly, etc.). In this way, the WLC Specific Plan will not remove or displace any of the existing residents or residences from the Project site. As large warehouse buildings are developed near or adjacent to these residences, it may become less desirable to reside within the WLC Specific Plan area; however, the Project itself does not cause housing displacement.

Therefore, impacts to the seven on-site residences would not be considered a significant housing impact. For these reasons, the WLC Specific Plan will not have significant population or housing impacts related to displacing substantial numbers of people or existing housing.

The *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California* (“Study”) prepared by DTAA in 2014 concluded that the WLC Project would generate 20,307 direct jobs/employees to the City. Section 4.13.5.3 of the EIR determined that the WLC Project is consistent with the 2011 Housing Element, and it will not displace substantial numbers of existing housing or necessitate the construction of replacement housing elsewhere. Therefore, no significant displacement impacts relative to people or housing are expected to occur, and no mitigation is required. (FEIR Volume 3 pgs. 4.13-18 to 4.13-19).

c. Cumulative Population and Housing Impacts

Potential Significant Impact: Whether the Project could cause an increase in population that is substantial in relation to the past, current, and probable future projects.

Findings: Potential impacts of the Project related to cumulative impacts of the Project on housing or population are discussed in detail in Section 4.13 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to cumulative impacts on housing or population will occur as a result of development of the Project and, therefore, no mitigation is required.

Fact Supporting the Findings: The cumulative area for the discussion of population and housing impacts is the City of Moreno Valley. The WLC Project would require a General Plan Amendment and Zone Change to re-designate the site from a mix of land uses and zoning designations to Logistics Development and Public Utility land uses and a Specific Plan zoning designation. The Project would not contribute to substantial population growth and therefore would not result in an increased demand on the current or future housing in the region. In addition, the Moreno Valley area is considered housing rich and jobs poor by SCAG, so the loss of population (and planned housing) would actually be a regional benefit according to the Regional Transportation Plan. The Project may result in an influx of new workers who would need to locate temporarily or permanently in the area, but the City has an overabundance of existing housing stock due to current market conditions. Implementation of the WLC Project would actually benefit population and housing conditions relative to employment and jobs/housing ratio and, therefore, not result in cumulatively adverse impacts to population or housing. The WLC Project would also not significantly induce growth into areas where growth was not previously anticipated since the WLC Project area represents the last largest remaining vacant land in the City of Moreno Valley. (FEIR Volume 3 pg. 4.13-19 to 4.13-20).

13. Public Services and Facilities

a. Law Enforcement Services and Facilities

Potential Significant Impact: Whether the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered law enforcement facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police services.

Findings: Potential impacts of the Project related to law enforcement services and facilities are discussed in detail in Section 4.14 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to law enforcement services or facilities will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.14 of the FEIR Volume 3, the WLC Specific Plan requires building and site design characteristics that specifically support police services by encouraging buildings that are safe and can be secured by design, fencing, security services, etc. The WLC Specific Plan design guidelines are consistent with the goals of the General Plan relative to police protection and site design. In addition, future development within the WLC Specific Plan will be required to comply with the City's Development Impact Fee (DIF) requirements as new development is constructed. It is anticipated that DIF revenues will help fund additional equipment needs and increased property taxes would help fund increased service or staffing needs. Therefore, the Project will have less than significant impacts relative to police service, and no mitigation is required. (FEIR Volume 3 pgs. 4.14-4 to 4.14-7).

b. Fire Protection Services and Facilities

Potential Significant Impact: Whether the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire-fighting facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police services.

Findings: Potential impacts of the Project related to fire-fighting services and facilities are discussed in detail in Section 4.14 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to law enforcement services or facilities will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.14 of the FEIR Volume 3, the WLC Specific Plan will dedicate a new 1.5-acre urban fire station site within its boundaries to allow for expansion of fire protection services as the Project develops (see WLC Specific Plan Section 2.2.6). The revised WLC Specific Plan indicates the new fire station will be at the north end of Planning Area 11. The WLC Specific Plan also requires building and site design characteristics that specifically support fire services by encouraging buildings that are safe and can be secured by design, fencing, security services, etc. The proposed WLC Specific Plan design guidelines are consistent with the goals of the General Plan relative to fire protection and site design. Finally, future development within the WLC Specific Plan will be required to comply with the City's DIF requirements as new development is constructed. Therefore, the Project will have less than significant impacts relative to fire protection service, and no mitigation is required. (FEIR Volume 3 pgs. 4.14-10 to 4.14-13).

c. School Facilities

Potential Significant Impact: Whether the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts.

Findings: Potential impacts of the Project related to school facilities are discussed in detail in Section 4.14 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to school facilities will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.14 of the FEIR Volume 3, the Project contains no residential development, so it would not cause a significant increase in the local population that would increase the number of students attending local schools. Since payment of the school impact fees is required of all projects within Moreno Valley Unified School District and San Jacinto Unified School District boundaries, impacts to school services and facilities would not occur. The WLC Project is also consistent with the applicable General Plan policies as it will assist in the provision of adequate school facilities by providing legally required development impact fees. Accordingly, impacts to the environment resulting from new or expanded school facilities would not occur, resulting in a less than significant impact and no mitigation is required. (FEIR Volume 3 pg. 4.14-15 to 4.14-17).

d. Parks, Recreation, and Trails

Potential Significant Impact: Whether the Project would result in increased use of existing neighborhood and regional parks or other recreational facilities (e.g., trails) where substantial physical

deterioration would occur or be accelerated or result in construction or expansion of recreational facilities that would have an adverse physical effect on the environment.

Findings: Potential impacts of the Project related to parks, recreation, and trails are discussed in detail in Section 4.14 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to parks, recreation, or trails will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.14 of the FEIR Volume 3, there is a potential for the Project to indirectly generate new residents in the City, although predicting the exact number would be too speculative. Increases in the City's population from future residential development will help fund new parks and trails through dedications of land and the payment of Development Impact Fees.

The WLC Specific Plan Project proposes a General Plan Amendment to the Master Plan of Trails to reduce the extent of trail systems in the area to reflect the change from a residential neighborhood (Moreno Highlands) to a non-residential neighborhood (World Logistics Center). Trail linkages are provided in the WLC Project to extend existing trail routes from the western edge of the Project to the east, providing for future linkages to Gilman Springs Road, to the Lake Perris State Recreation Area, and to the San Jacinto Wildlife Area.

Implementation of these new trails and the General Plan Amendment (i.e., revised Master Plan of Trails) will allow the Project to be consistent with the General Plan policies relative to trails. The Project is consistent with the City General Plan policies relative to parks, recreation, and trails.

The WLC Specific Plan will provide connections to existing trails to the west and southwest, and a connection to and trailhead for a future planned trail in the San Jacinto Wildlife Area south of the site, as outlined in Section 3.4.2, *Multi-Use Trails*, and as shown on Figure 3-17 of the Specific Plan. In addition, future development within the WLC Specific Plan will pay applicable DIFs to offset any potential impacts to parks or recreational services. Based on this, the Project will not create significant impacts on parks, recreation, or trails.

The Project does not include the construction or expansion of a recreational facility since it would not create any substantial demands on recreational facilities. The Project would have a less than significant impact on population or housing; therefore, no new demand on existing park facilities would occur, and no expansion of existing parks or the construction of new parks would be required. (FEIR, Volume 3 pgs. 4.14-23 to 4.14.25).

e. **Cumulative Public Services and Facilities and Parks, Recreation, and Trails Impacts**

Potential Significant Impact: Whether the Project could cause an increase in population resulting in the deterioration of public services and facilities and/or parks, recreation, and trails that is substantial in relation to the past, current, and probable future projects.

Findings: Potential impacts of the Project related to cumulative impacts of the Project on public services and facilities, and parks, recreation, and trails are discussed in detail in Section 4.14 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to cumulative impacts on public services and facilities, and parks, recreation, and trails will occur as a result of development of the Project; therefore, no mitigation is required.

Fact Supporting the Findings: The cumulative areas for police and fire protection services are the service areas for the Riverside County Sheriff's Department (RCSD) and Riverside County Fire Department (RCFD). The need for the public services and associated facilities is measured by service area population, or the number of residents and workers within the City's service area. Service population, as well as the type and density of development, determines the need for new or expanded police and services. Utilizing statistical information, local planning policies, and by interacting with other agencies, fire and police service providers can delineate past patterns, emerging trends, and future issues of concern. Once identified, service providers can redeploy resources to meet future needs.

There is the need for new fire station within the WLC Project. Payment of DIFs and provision of a new fire station site within the WLC Specific Plan is expected to fully mitigate potential impacts of the WLC Project relative to fire services. In addition, payment of DIFs is expected to fully mitigate potential impacts of the WLC Project relative to police services.

As additional development occurs in the City of Moreno Valley and region, there may be an overall increase in the demand for law enforcement and fire protection services, including personnel, equipment, and/or facilities. Increases in demand are routinely assessed by these agencies as part of the annual monitoring and budgeting process. New development within the service areas of the RCSD and RCFD would be required to adhere to conditions established by fire and police service providers. Therefore, there would be no cumulative impact on police and fire services in the City. Accordingly, cumulative impacts to the environment resulting from new or expanded police and fire protection facilities would not occur, resulting in a less than significant impact and no mitigation is required.

The cumulative area for school-related issues encompasses the two school district(s) that provide school services/facilities in the Project area. While no significant population increase is anticipated to result from the construction and operation of the Project, future development (particularly residential development) forecast in the City's General Plan will increase the demand for school facilities and services. New school facilities are currently being constructed to accommodate the growth in the local student population. Additionally, school districts are engaged in planning new facilities in anticipation of future local and regional growth. Each district requires the payment of development fees to provide for new school services and/or facilities. As every new development is mandated to provide the fees applicable to the school district affected, there would be no cumulative impact on school services in the City. Accordingly, cumulative impacts to the environment resulting from new or expanded school facilities would not occur, resulting in a less than significant impact and no mitigation is required.

Implementation of the Project will not increase the use of existing parks and recreation facilities. As future residential development is proposed, the City will require developers to provide the appropriate amount of parkland or payment of in-lieu fees, which will contribute to future recreational facilities. Payment of these fees and/or implementation of facilities on a project-by-project basis would offset cumulative parkland impacts by providing funding for new and/or renovated parks equipment and facilities. As such, the cumulative impact of buildout associated with the implementation of the Project, when considered with cumulative projects in the area, would be less than significant with implementation of the WLC Project. (FEIR Volume 3 pg. 4.14-26 to 4.14-27).

14. Transportation

a. Air Traffic Patterns

Potential Significant Impact: Whether the Project would result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Findings: Potential impacts of the Project related to air traffic patterns are discussed in detail in Section 4.15 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to air traffic patterns will occur as a result of development of the Project and, therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.15 of the FEIR Volume 3, airport facilities within the vicinity of the Project site include the March Air Field, which is part of the March Air Reserve Base (MARB). The Department of the Defense (Air Force) completed an Air Installation Compatible Use Zone (AICUZ) study for MARB in 1998. The AICUZ study was designed and is intended to aid in the

development of compatible land uses in non-government areas surrounding military airfields to protect public safety and health. The study established three zones based on potential crash patterns: a Clear Zone and two Accident Potential Zones (APZs). The Clear Zone reaches from along the extended runway centerline to a distance of 3,000 feet, APZ 1 extends from 3,000 feet to 8,000 feet, and APZ II extends from 8,000 feet to 15,000 feet. According to the AICUZ, outside of the Clear Zone and APZs “the risk of aircraft accidents is not significant enough to warrant special consideration in land use planning.” The Project site is not located within a Clear Zone, APZ 1, or APZ 2 for MARB as designated by the Air Force 2005 AICUZ Study. In addition to the AICUZ, Airport Influence Area boundaries around MARB have been adopted by County of Riverside Airport Land Use Commission (ALUC) in its Airport Land Use Plan (ALUP). The Project site is located within Influence Area III.

The Project site is approximately 5.5 miles east of the March Air Field and is entirely within Airport Influence Area III of the MIP. As part of the standard process for development within Airport Influence Areas for MARB, Projects are required to be reviewed by the ALUC for consistency with the ALUP. As a standard condition imposed during ALUC reviews, development located within the boundaries of Influence Area III is required to provide navigation easements. Development that is allowed to occur within Airport Influence III of MIP would not include any features that would alter air traffic patterns or the level of air traffic at the MIP; therefore, a less than significant air safety impact would occur and no mitigation is required. (FEIR Volume 3 pg. 4.15-86 to 4.15-87).

b. Design Features or Incompatible Uses

Potential Significant Impact: Whether the Project would substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Findings: Potential impacts of the Project related to design features or incompatible uses are discussed in detail in Section 4.15 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to design features or incompatible uses will occur as a result of development of the Project and, therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.15 of the FEIR Volume 3, the design of roadways must provide adequate sight distance and traffic control measures. This provision is normally realized through roadway design to facilitate roadway traffic flows. Roadway improvements in and around the Project site would be designed and constructed to satisfy all City and Caltrans requirements for street widths, corner radii, intersection control as well as incorporate design standards tailored specifically

to Project access requirements. Adherence to applicable City requirements would ensure the Project would not include any sharp curves or dangerous intersections.

During the Project review process, City staff expressed a concern about the intersection of Cactus Extension Street and the eastern end of Cactus Avenue, east of Redlands Boulevard. Early designs showed it as a skewed “T” intersection, but the Specific Plan now shows it as a more gently curving “knuckle” configuration, which eliminated the original concern about the safety of the intersection.

Temporary impacts associated with the construction of infrastructure improvements included as a part this Project may temporarily restrict vehicular traffic or cause temporary hazards. The construction of infrastructure would coincide with roadway improvements, which would include road or lane closures as well as the presence of construction workers and equipment on public roads. Construction operations would be required to implement adequate measures to facilitate the passage of people and vehicles through/around any required road or lane closures. Site-specific activities, such as temporary construction activities, are finalized on a project-by-project basis by the City and are required to ensure adequate traffic flow. At the time of approval of any site-specific plans required for the construction of infrastructure as a part of typical conditions of approval, the Project would be required to implement measures that would maintain traffic flow and access. In the absence of a roadway design hazard, no impact would occur; therefore, no mitigation is required.

As identified in the Project TIA, the Project would not produce a significant safety risk and appropriate safety features are already present on roads near local schools. Other than Perris Boulevard, which would experience a small number of Project trucks (22 and 25 medium and heavy duty trucks in the a.m. and p.m. peak hours, respectively), none of the other truck routes would result in Project trucks traveling near local schools. The safety impact of Project-related passenger cars along streets near local schools was also evaluated by reviewing existing pedestrian facilities and collecting pedestrian counts at the intersections along Project truck routes. All pedestrian crossings at signalized intersections near schools are protected. Crosswalks near schools are striped in yellow (per the California Manual on Traffic Control Devices page 1,282). In most cases, sidewalks exist along roadways and lead to the striped, protected crosswalks at the intersections. Intersection and roadway features along Project truck routes were reviewed and it was determined that adequate pedestrian amenities already exist in the form of protected crossings, crosswalks, curb ramps, and pedestrian signals. For these reasons, Project passenger cars and trucks would not create unsafe conflicts with pedestrians. (FEIR Volume 3 pgs. 4.15-87 to 4.15-88).

c. Inadequate Emergency Access

Potential Significant Impact: Whether the Project would result in inadequate emergency access.

Findings: Potential impacts of the Project related to emergency access are discussed in detail in Section 4.15 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to emergency access will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.15 of the FEIR Volume 3, Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate measures to facilitate the passage of people and vehicles through/around any required road closures. Site-specific activities such as temporary construction activities are finalized on a project-by-project basis by the City and are required to ensure adequate emergency access.

The roadway improvements that will take place as a part of this Project will improve the traffic circulation in the area. For example, emergency vehicles that currently pass through the site using either Theodore Street or Alessandro Boulevard would continue to have those routes available to them, and these roads will be upgraded to arterial standards within the Project limits. Access to Alessandro Boulevard would be provided by a connection to Redlands Boulevard at Cactus Avenue instead of a direct extension to Alessandro Boulevard. The change would not lengthen the distance between Gilman Springs Road and the Riverside Community Regional Medical Center on Cactus Avenue or the route to and from the Kaiser Moreno Valley Community Hospital on Iris Avenue. The extension of Eucalyptus Avenue through the Project area would improve access between the Project site and the nearest existing fire station (the Moreno Beach fire station). As a condition of approval, the Project will also be required to construct a fire station on site.

These roadway improvements of the Project would enhance the ability of emergency vehicles to access the Project as well as the surrounding properties. Access to the Project site is designed to accommodate large trucks with trailers used for the distribution of goods to and from the warehouses. This would provide ample vehicular access for emergency vehicles. During the operational phase of the Project, on-site access would be required to comply with standards established by the City Public Works Department. The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to Fire Department standards. As required of all development in the City, the operation of the Project would conform to applicable Uniform Fire Code standards. The submittal of such plans would be considered a condition of approval, which would be part of the permitting process

initiated by the applicant and approved by the City in accordance with City standards. As with any development, access to and through the Project would be required to comply with the required street widths, as determined in the California Building Code (CBC), Master Plan of Streets, and the Uniform Fire Code. Therefore, implementation of the Project would not significantly impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; therefore, no mitigation is required. (FEIR Volume 3 pg. 4.15-89)

d. Alternative Transportation

Potential Significant Impact: Whether the Project would conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Findings: Potential impacts of the Project related to alternative transportation are discussed in detail in Section 4.15 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to alternative transportation will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.15 of the FEIR Volume 3, the Project would result in the development of employment opportunities and would therefore reduce vehicle miles traveled. The provision of additional employment options in proximity to existing residential development in the City will help reduce local vehicle miles traveled as the employment generated by the Project slowly improves the City's job/housing ratio, and more local jobs are created for City residents. Therefore, the Project is consistent with City policies encouraging alternative transportation. Since the Project will not create any significant impacts related to non-vehicular transportation, no mitigation is required.

Although there is currently no transit service in the Project area, the Project would be designed to accommodate bus access on all Project streets. Bus turn-outs and shelters would be provided at all active bus stops. It is expected that transit service would be provided once the Project reaches a transit-supportable level of operations. Candidate streets for future bus routes within the Project limits are Eucalyptus Avenue, Street C, Street E, and Street F.

The WLC Specific Plan provides for Class II bicycle lanes on all Project streets. In addition, WLC Specific Plan Section 6.0, Sustainability, Item 2 indicates showers and changing rooms will be available which will facilitate people using bicycles to get to and from work.

The WLC Specific Plan provides for connections to existing trails to the west along Redlands Boulevard, and to the southwest along Cactus Avenue. In addition, the plan provides for a new trail connection from the southwest corner of the site around the land designated as open space under the WLC Specific Plan, to connect to a future planned “trailhead” at the northwest corner of the state-owned property to the south. The WLC Specific Plan also includes a “loop” trail segment through the WLC Specific Plan along Street F to Eucalyptus Avenue and back to Redlands Boulevard. In addition, the Project will be conditioned to provide sidewalks and landscaping treatments to allow for pedestrian access throughout the site. With these planned improvements, the WLC Specific Plan will have less than significant impacts regarding non-vehicular circulation and no mitigation is required. (FEIR Volume 3 pg. 4.15-89 to 4.15-90).

15. Utilities and Service Systems

a. Construction or Expansion of Water Treatment Facility

Potential Significant Impact: Whether the Project would require the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.

Findings: Potential impacts of the Project related to construction or expansion of water treatment facilities are discussed in detail in Section 4.16 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts that would cause the construction or expansion of water treatment facilities will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.16 of the FEIR Volume 3, Metropolitan has analyzed the reliability of water delivery through the State Water Project (SWP) and the Colorado River Aqueduct. Metropolitan’s Integrated Resources Plan and 2010 Regional Urban Water Management Plan conclude that, with the storage and transfer programs developed by Metropolitan, there will be a reliable source of water to serve its member agencies’ needs through 2035.

All necessary water distribution facilities would be installed simultaneously with required roadway frontage improvements for each phase of development of the WLC Project. Therefore, the connection to the existing water delivery system would not result in substantial disturbance of existing roadways or water facilities. As previously identified, the potable water demand that would be required for the WLC Project would total 1,991.25 acre-feet per year (AFY). The amount of water demand would be within the existing available supply even with a reduction in deliveries from the State Water Project (SWP). Imported sources of water will be supplemented by an increase in desalination of brackish groundwater,

recycled water use, and water use efficiency, and implementation of aggressive conservation measures by the EMWD. The WLC Project would not require the construction of new water treatment facilities or expansion of existing facilities, which could cause significant environmental effects. (FEIR Volume 3 pgs. 4.16-13 to 4.16-15)

b. Wastewater Treatment Requirements

Potential Significant Impact: Whether the Project would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB).

Findings: Potential impacts of the Project related to construction or expansion of water treatment facilities are discussed in detail in Section 4.16 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts that would exceed wastewater treatment requirements of the applicable RWQCB as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.16 of the FEIR Volume 3, The WLC Project would result in a connection to the sewer line underlying Redlands Boulevard in the vicinity of the intersection of Redlands Boulevard and Brodiaea Avenue. It is anticipated that all wastewater generated by the WLC Project would be routed to and treated by the Moreno Valley Regional Water Reclamation Facility (MVRWRF). The MVRWRF is considered to be a publicly owned treatment works (POTW), so operational discharge flows treated at the MVRWRF would be required to comply with waste discharge requirements contained within the waste discharge requirements for that facility. Compliance with condition or permit requirements established by the City, and waste discharge requirements at the MVRWRF would ensure that discharges into the wastewater treatment facility system from the operation of the WLC Project would not exceed applicable Santa Ana RWQCB wastewater treatment requirements. Expected wastewater flows from the WLC Project will not exceed the capabilities of the serving treatment plant, so no significant impact related to this issue would occur and no mitigation would be required. (FEIR Volume 3 pgs. 4.16-28).

c. Wastewater Treatment Capacity and/or New or Expanded Wastewater Treatment Facilities

Potential Significant Impact: Whether the Project would result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it lacks adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments or require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Findings: Potential impacts of the Project related to adequate water supply are discussed in detail in Section 4.16 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to wastewater treatment capacity or need for new or expanded wastewater treatment facilities will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.16 of the FEIR Volume 3, the WLC Project would connect to the existing sewer pipeline underlying Redlands Boulevard in the vicinity of the intersection of Redlands Boulevard and Brodiaea Avenue. Wastewater flows from the WLC Project site would be handled by the EMWD and would be conveyed to the MVRWRF located in the southwestern portion of the City, southwest of the WLC Project site. Current capacity at this facility is 16 mgd¹⁰ with an existing average inflow of approximately 11.2 million gallons per day (mgd).¹¹ Under current conditions, the average daily surplus treatment capacity is approximately 4.5 mgd. Generally, water use and wastewater flows are related in that wastewater is generated from indoor water uses.

Based on a square footage of 40.6 million, the wastewater generated from the logistics uses on the site is 812,000 gallons per day (gpd). An additional 5,100 gpd of flow was added to account for the in-Project fueling station. Thus, the total wastewater generated from the site is 817,100 (0.82 mgd). The additional wastewater treatment demand of 0.82 mgd resulting from development of the WLC Project totals approximately 18.2 percent of current surplus treatment capacity. Improvements planned for the MVRWRF facility would increase capacity at this facility from 16 mgd to 18 mgd with an ultimate expansion of this facility of 41 mgd. The planned expansion of the MVRWRF to increase capacity from 16 mgd to 18 mgd is anticipated to be completed by June 2013.¹² Impacts associated with wastewater facilities would be less than significant because the amount of wastewater generated by the Project would be within the existing surplus treatment capacity at the MVRWRF. The WLC Project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, which could cause significant environmental effects. Therefore, impacts associated with wastewater facilities would be less than significant and no mitigation is required. (FEIR Volume 3 pgs. 4.16-29).

d. Cumulative Impacts to Wastewater Facilities

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would result in cumulative impacts to wastewater facilities.

¹⁰ 5.13 *Public Services and Utilities*, City of Moreno Valley General Plan Final EIR, July 2006.

¹¹ Eastern Municipal Water District Moreno Valley Regional Water Reclamation Facility, <http://www.emwd.org/modules/showdocument.aspx?documentid=1423>, website accessed April 2, 2012.

¹² 3.10.b *Regional Water Reclamation Facilities*, West San Jacinto Groundwater Basin Management Plan 2010 Annual Report, Eastern Municipal Water District, June 2011.

Findings: Potential impacts of the Project related to cumulative wastewater facilities are discussed in detail in Section 4.16 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant cumulative impacts related to wastewater facilities will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.16 of the FEIR Volume 3, the Project would not have a cumulatively significant impact on wastewater infrastructure because the WLC Project would not require the expansion of existing infrastructure, only connections to existing infrastructure would be required by the Project. By adhering to the wastewater treatment requirements established by the Santa Ana RWQCB through the NPDES permit, wastewater from the Project site that is processed through the MVRWRF would meet established standards. As the wastewater from all development within the service area of the MVRWRF would be similarly treated under the NPDES, no cumulatively significant exceedance of Santa Ana RWQCB wastewater treatment requirements would occur.

The MVRWRF is expected to have adequate capacity to service the City's wastewater needs through 2030. Any proposed changes to capacity of the MVRWRF or any facility maintained by EMWD are reviewed throughout the year. EMWD has a funding and construction mechanism in place that ensures improvements to EMWD facilities occurs in a timely manner. This funding mechanism is referred to as EMWD's Sewer Financial Participation Charge Program. For all new development within the EMWD service area, the Sewer Financial Participation Charge is allocated to assist in the financing of any future collection and disposal facilities and any future sewer treatment plant facilities. Cumulative development would not exceed the capacity of the wastewater treatment system because the MVRWRF would expand as growth occurred. (FEIR Volume 3 pg. 4.16-29 to 4.16-30)

e. Solid Waste Facilities

Potential Significant Impact: Whether the Project would be served by a landfill with insufficient permitted capacity to accommodate the Project's solid waste disposal needs.

Findings: Potential impacts of the Project related to solid waste facilities are discussed in detail in Section 4.16 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to solid waste facilities will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.16 of the FEIR Volume 3, the WLC Project is anticipated to generate approximately 104.6 tons of solid waste per day (38,164 tons/year).¹³ Solid waste from the WLC Project would be hauled by Waste Management of Inland Valley and transferred to the Badlands Sanitary Landfill, located in Moreno Valley. The Badlands Sanitary Landfill has a daily permitted throughput of 4,000 tons per day, a remaining capacity of 14,730,025 cubic yards, and an estimated closure date of 2024.¹⁴ The average daily throughput at the Badlands Sanitary Landfill for 2011 is estimated at 1,683 tons/day¹⁵ with a current surplus capacity totaling 2,317 tons/day.

The volume of solid waste generated by the WLC Project per day represents 2.6 percent of the current permitted throughput and 4.5 percent of the current surplus capacity at the Badlands Sanitary Landfill. As adequate daily surplus capacity exists at the receiving landfill, development of the WLC Project would not significantly affect current operations or the expected lifetime of the landfill serving the Project area. No significant solid waste disposal impact would occur and no mitigation is required. (FEIR Volume 3 pgs. 4.16-32 to 4.16-33)

f. Solid Waste Reduction

Potential Significant Impact: Whether the Project would fail to comply with applicable Federal, State, and local statutes and regulations related to solid waste.

Findings: Potential impacts of the Project related to solid waste reduction are discussed in detail in Section 4.16 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant impacts related to solid waste reduction will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.16 of the FEIR Volume 3, The City of Moreno Valley is responsible for meeting the requirements of AB 939 and SB 1016, which includes a 50 percent reduction in disposal by the start of 2000 and preparation of a solid waste reduction plan to help reduce the amount of solid waste disposed of at the landfills. Various programs are implemented by the City of Moreno Valley to satisfy the mandated reduction in solid waste.

The WLC Project would be required to coordinate with the waste hauler to develop collection of recyclable materials for the Project on a common schedule as set forth in applicable local, regional, and

¹³ South Coast Air Quality Management District. CalEEMod Manual, Appendix D, Table 10.1, Solid Waste Disposal Rate for Unrefrigerated Warehouse. <http://www.aqmd.gov/calmod/user's-guide>. Calculation: 0.94 tons/thousand square feet/year × 40,600 thousand square feet = 38,164 tons per year.

¹⁴ *Badlands Sanitary Landfill Facility/Site Summary Details*, CalRecycle website, <http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0006/Detail/>, website accessed April 2, 2012.

¹⁵ Based on 2011 average; e-mail correspondence with John Farrar, Administrative Services Assistant, County of Riverside Waste Management Department, December 2, 2012.

State programs. Recyclable materials that would be recycled by the Project include paper products, glass, aluminum, and plastic. Additionally, the Project would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991) and other applicable local, State, and Federal solid waste disposal standards, thereby ensuring that the solid waste stream to the Badlands Sanitary Landfill is reduced in accordance with existing regulations. Impacts are considered less than significant and require no mitigation. (FEIR Volume 3 pg. 4.16-33 to 4.16-34).

g. Solid Waste Cumulative Impacts

Potential Significant Impact: Whether the Project in connection with past, current, and probable future projects would have an incremental impact on solid waste.

Findings: Potential impacts of the Project related to cumulative solid waste are discussed in detail in Section 4.16 of the FEIR Volume 3. Based on the entire record before us, this Council finds that no significant cumulative impacts related to solid waste will occur as a result of development of the Project; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.16 of the FEIR Volume 3, AB 939 mandates the reduction of solid waste disposal in landfills. While the Badlands Sanitary Landfill has an estimated closure date of 2024, as previously identified, the City's waste hauler will also use other County landfills in the area (e.g., Lamb Canyon Landfill and El Sobrante Landfill). The estimated closure date of the Lamb Canyon Landfill is 2023 and the estimated closure date of the El Sobrante Landfill is 2030. With planned expansion activities of landfills in the Project vicinity and projected growth rates contained in the City's General Plan EIR, sufficient landfill capacity would exist to accommodate future disposal needs through City buildout in 2030. Therefore, buildout of the City General Plan would not create demands for solid waste services that would exceed the capabilities of the County's waste management system. Consequently, cumulative impacts associated with solid waste within the City would be considered less than significant. (FEIR Volume 3 pgs. 4.16-34).

B. ENVIRONMENTAL IMPACTS MITIGATED TO A LEVEL OF LESS-THAN-SIGNIFICANT

Public Resources Code Section 21081 states that no public agency shall approve or carry out a project for which an EIR has been completed which identifies one or more significant effects unless the public agency makes one or more of the following findings:

- I. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
- II. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- III. Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR, and overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

Certain of the following issues from the environmental categories analyzed in the EIR, including aesthetics, agricultural resources, biological resources, cultural and paleontological resources, hazards and hazardous materials, hydrology, drainage, water quality, noise (short-term construction), transportation (local intersections), utilities, and global climate change (individually and cumulatively) were found to be potentially significant, but can be mitigated to a less-than-significant level with the imposition of mitigation measures. This Council hereby finds pursuant to *Public Resources Code* Section 21081 that all potentially significant impacts listed below can and will be mitigated to below a level of significance by imposition of the mitigation measures in the EIR; and that these mitigation measures are included as Conditions of Approval and set forth in the Mitigation Monitoring and Reporting Program (MMRP) adopted by this Council. Specific findings of this Council for each category of such impacts are set forth in detail below.

1. Aesthetics

a. Light and Glare

Potentially Significant Impact: The EIR evaluated and concluded that the Project has the potential to introduce a significant new source of light and glare into the Project area.

Finding: Potential impacts of the Project related to light and glare impacts are discussed in detail in Section 4.1 of the FEIR, Volume 3. Based on the entire record before us, this Council finds that potentially significant impacts related to light and glare would be reduced to a less than significant level with implementation of **Mitigation Measures 4.1.6.4.A** and **4.1.6.4.B**:

4.1.6.4A Each Plot Plan application for development adjacent to residential development shall include a photometric plot of all proposed exterior lighting demonstrating that the project

is consistent with the requirements of Section 9.08.100 of the City Municipal Code. The lighting study shall indicate the expected increase in light levels at the property lines of adjacent residential uses. The study shall demonstrate that the proposed lighting fixtures and/or visual screening meet or exceed City standards regarding light impacts.

4.1.6.4B Each Plot Plan application for development shall include an analysis of all proposed solar panels demonstrating that glare from panels will not negatively affect adjacent residential uses or negatively affect motorists along perimeter roadways. Design details to meet these requirements shall be implemented to the satisfaction of the Planning Official.

Facts in Support of the Finding: According to Section 4.1 of the FEIR Volume 3, development of the Project site would introduce numerous new sources of light and glare into the area in the form of street lighting, parking lots, and security lighting for the buildings and nighttime traffic.

The WLC Specific Plan requires that all site lighting be oriented downward so as to not project direct light rays upward into the sky or onto adjacent properties. The development of the Project will cause a significant increase in light and glare in the area. This new lighting will incrementally affect nighttime conditions in the area.

Exterior surfaces of the concrete tilt-up structure would be finished with a combination of architectural coatings, trim, and/or other building materials such as concrete and brushed metal. The Project will incrementally increase the amount of daytime glare in the Project area by introducing windows and metal fixtures into the area. All development in the City, which includes light generated from warehouse buildings and parking lots, is required to adhere to lighting requirements contained in the City's Municipal Code (Section 9.08.100 Lighting), which states that any outdoor lighting associated with nonresidential uses shall be shielded and directed away from the surrounding residential uses. Such lighting shall not exceed one-quarter (0.25) foot-candle at property lines and shall not blink, flash, oscillate, or be of unusually high intensity or brightness. Lighting in parking areas and drive aisles must be at least 1.0 foot candle and cannot exceed a maximum of 8.0 foot candles.

Adherence to the City's Zoning Code would help reduce potential building or parking lighting impacts, but the location of industrial uses adjacent to residential uses would not reduce potential lighting impacts on adjacent residential uses to less than significant levels.

The WLC Specific Plan also allows for the installation of roof-mounted solar panels on future warehouse buildings and these panels may produce unintended glare to the southeast, south, and southwest of the site, depending on the angle of the sun, the number and location of panels, and the degree to which the

building parapet blocks views of the panels from surrounding land uses. Without additional information, this impact is determined to be potentially significant and requires mitigation.

Light and glare impacts of the Project can be reduced to less than significant levels by compliance with the lighting requirements of the City Municipal Code and implementation of **Mitigation Measures 4.1.6.4A** and **4.1.6.4B**. (FEIR Volume 3 pgs. 4.1-80 to 4.1-82).

2. Agricultural Resources

a. Farmland Conversion

Potential Significant Impact: The EIR evaluated and concluded that the Project has the potential to convert 25 acres of Unique Farmland as identified by the State of California to non-agricultural uses.

Finding: Potential impacts of the Project related to farmland conversion are discussed in detail in Section 4.2 of the FEIR Volume 3. Based on the entire record before us, this Council finds that potentially significant impacts related to farmland conversion would be reduced to a less than significant level with implementation of **Mitigation Measure 4.2.6.1.A**:

4.2.6.1A Prior to the issuance of any grading permit affecting land designated as “Unique Farmland” (Figure 4.2.2 in the World Logistics Center Environmental Impact Report), an Agricultural Conservation Easement shall be recorded over land of equivalent or better agricultural economic productivity of the offsite easement property compared to the World Logistics Center property. The analysis will include a comparison of the project’s “Unique Farmland” considering its relative economic potential as the best measure of productivity (i.e., net profitability per acre or potential net rental income per acre). It will include a consideration of various important physical factors including location and accessibility, soils and topography, micro and macro climatic conditions, water availability and quality, as well as local practices, good farm management and cultural (growing) costs. The form and content of this easement, as well as the estimates of agricultural productivity, shall be reviewed and approved in advance by the Planning Official.

Facts in Support of the Finding: According to Section 4.2 of the FEIR Volume 3, approximately 25 acres of the Project site are designated Unique Farmland. Under the Specific Plan, this land will eventually be converted to non-agricultural use, which would result in a significant and unavoidable impact relative to “designated” farmland conversion. In addition, the Project would result in the conversion of 2,201 acres of land designated as Farmland of Local Significance within the Specific Plan

area (total 2,610 acres total minus 25 acres of Unique Farmland and 384.0 acres designated as Other). The 1,104 acres of open space and utility lands south of the Specific Plan site are not proposed for development and it is expected they will remain in their existing condition (i.e., dry farming). The eventual conversion of 25 acres of Unique Farmland is a significant impact of the Project resulting from the basic Project objectives. However, implementation of **Mitigation Measure 4.2.6.1A** will reduce this impact to a less than significant level (FEIR Volume 3 pgs. 4.2-18 to 4.2-20).

b. Conversion of Farmland to Non-Agricultural Uses

Potential Significant Impact: The EIR evaluated and concluded that the Project has the potential to convert approximately 2,226 acres of land currently being farmed, which includes 2,201 acres of land designated as Farmland of Local Importance, to non-agricultural uses.

Finding: Potential impacts of the Project related to conversion of farmland to non-agricultural uses are discussed in detail in Section 4.2 of the FEIR Volume 3. Based on the entire record before us, this Council finds that potentially significant impacts related to conversion of farmland to non-agricultural use would be reduced to a less than significant level with implementation of the above **Mitigation Measure 4.2.6.1.A**.

Facts in Support of the Findings: According to Section 4.2 of the FEIR Volume 3, implementation of the Project would result in the permanent conversion of approximately 2,226 acres currently used for dry farming to non-agricultural uses. While this could have an effect on accelerating the loss of other existing agricultural land, the state conservation lands to the south could be continued for agricultural production. Likewise, there is no other agricultural use in the Zone of Influence (term used in the State LESA Model) and a majority of the land in that zone is vacant (i.e., in the Badlands to the east and portions of the San Jacinto Wildlife Area and the Lake Perris State Recreation Area to the south). The conversion of agricultural lands to urban uses is supported by the City's General Plan policies. The entire Project site and adjacent lands have been designated for urban uses for nearly 20 years by the City. Nevertheless, much of the Specific Plan area is designated Farmland of Local Importance and will be permanently converted to non-agricultural urban uses. Therefore, the Project will cause significant impacts related to conversion of locally important farmland. However, implementation of **Mitigation Measure 4.2.6.1A** to establish an offsite agricultural conservation easement would mitigate the conversion of agricultural land, to non-agricultural uses. With implementation of this measure, Project impacts to agricultural resources are reduced to less than significant levels (FEIR Volume 3 pgs. 4.2-20 to 4.2-23).

c. Cumulative Agricultural Impacts

Potential Significant Impact: The EIR evaluated and concluded that the Project has the potential to remove 25 acres of Unique Farmland from potential agricultural production in Riverside County. In addition, it will eventually remove 2,201 acres of land that is designated as Farmland of Local Importance (including all of the land currently being dry farmed, in the Project area) from potential agricultural production in this portion of the County.

Findings: Potential impacts of the Project related to cumulative agricultural impacts are discussed in detail in Section 4.2 of the FEIR Volume 3. Based on the entire record before us, this Council finds that potentially significant impacts related to cumulative agricultural impacts would be reduced to a less than significant level with implementation of **Mitigation Measures 4.2.6.1.A**.

Facts in Support of the Findings: According to Section 4.2 of the FEIR Volume 3, the Project has the potential to remove 25 acres of Unique Farmland from potential agricultural production in Riverside County. In addition, it will eventually remove 2,201 acres of land that is designated as Farmland of Local Importance (including all of the land currently being dry farmed, in the Project area, from potential agricultural production in this portion of the County).

While agricultural land is a finite resource, the City, through its designation of the site for non-agricultural urban uses in its General Plan, has previously considered that continuing development pressures in the City and region would result in the conversion of agricultural land to non-agricultural uses. The utilization of the property sites for agricultural activity would impede the City from achieving the goals and objectives set forth in its General Plan.

The CBRE¹⁶ and the ACC¹⁷ reports concluded that the agriculture industry within the Inland Empire will become less competitive and continue to decline whether or not the Project is developed. Under these circumstances, no mitigation that would artificially preserve or prolong agricultural activities (i.e., other than current market forces) in the Project area would be feasible or effective over the long term.

The continuation of agricultural operations on site over the long term is likely not economically viable. The County continues to experience a net loss of Unique Farmland and Farmland of Local Importance, and the development of the Project would contribute to the countywide net loss of designated farmland. However, with implementation of **Mitigation Measure 4.2.6.1A**, the WLC Project will not make a

¹⁶ Agricultural Resources Assessment for the World Logistics Center Specific Plan Draft Environmental Impact Report, Parsons Brinckerhoff, original dated February 2012, revised dated December 2013).

¹⁷ An Agriculture Industry Analysis of the Inland Empire, Andrew Chang & Company, LLC. March 12, 2012 (FEIR Appendix C).

significant contribution to cumulative agricultural impacts in western Riverside County. (FEIR Volume 3 pgs. 4.4-23 to 4.4-24)

3. Air Quality

a. Cancer Risk and Cancer Burden

Potential Significant Impact: The EIR evaluated and concluded that construction and operation of the Project would have the potential to result in a significant health risks.

Finding: Potential impacts of the Project related to cancer risk and cancer burden impacts are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that potentially significant impacts related to cancer risk impacts would be reduced to a less than significant level with implementation of **Mitigation Measures 4.1.6.1A, 4.3.6.2A, 4.3.6.2B, 4.3.6.2D, 4.3.6.3A, 4.3.6.3B, 4.3.6.3C, 4.3.6.3D, and 4.3.6.3E.**

Facts in Support of the Finding: As set forth in EIR Section 4.3, adverse health effects would exist, in the absence of mitigation, as a result of the construction and operation of the Project.

However, as also set forth in EIR Section 4.3, in January, 2015, the Health Effects Institute (HEI) announced the results of the final phase of its five and a half year Advanced Collaborative Emissions Study (ACES), the first comprehensive evaluation of lifetime exposures of rats, which are more sensitive to diesel exhaust than humans, to exhaust from diesel engines designed to meet the strict USEPA emission regulations enacted in 2007. The HEI study distinguished between older Traditional Diesel Exhaust (TDE) (exhaust from engines that are older than model year 2007) engines and new technology diesel exhaust (NTDE) (exhaust from engines that model year 2007 or newer) engines.

Phase 3 of ACES evaluated whether emissions from NTDE engines cause cancer or other adverse health effects. Specifically, it evaluated the health impacts of a 2007-compliant engine equipped with a diesel particulate filter. The study confirmed that the concentrations of particulate matter and toxic air pollutants emitted from NTDE engines are more 90 to 99% lower than emissions from TDE engines. HEI found that lifetime exposure to NTDE “would *not* cause an increase in tumor formation or substantial toxic health effects in rats ...” [italics in the original].

Mitigation Measures 4.3.6.3B and 4.3.6.2A require that all diesel trucks that access the Project site be model 2010 or newer and that construction equipment used on the project site be Tier 4 which has diesel exhaust equivalent to that emanating from 2010 compliant diesel trucks. Because of these mitigation

measures, the HEI study indicates that the Project will have a less than significant health risk associated with both the construction and the operation of the project.

The DEIR analysis of health risks from diesel exhaust was prepared before the release of the HEI study and therefore assumed that diesel exhaust would result in health risks. The methodology in effect at the time showed that the cancer risk, both on and off the Project site, exceeded the significance threshold adopted by the South Coast Air Quality Management District. Since the time that the DEIR was prepared, the California Office of Environmental Health Hazard Assessment (OEHHA) has released a new methodology which decreases the exposure times of various classes of receptors and adds age weighting factors to reflect the increased sensitivity of infants and children. The FEIR has applied this new methodology, referred to as the “Current OEHHA Guidance” in the FEIR, to the diesel exhaust resulting from the construction and operation of the Project to allow the reader to compare the results obtained using both the old and the new methodologies on the assumption that NTDE does result in adverse health effects.

Table 4.3.AF shows the estimated cancer risks using the “Current OEHHA Guidance” after application of mitigation. Although the cancer risks are substantially less after mitigation, the SCAQMD cancer risk significance threshold would continue to be exceeded at locations within the project boundaries but not at any residential areas outside of the project boundary. The large reduction in cancer risk after mitigation is attributable principally to the reduced diesel particulate matter attributed to mitigation such as the commitment to Tier 4 construction equipment. The impact of this mitigation is largely felt during the first 3 to 5 years of construction when the “Current OEHHA Guidance” assigns large age sensitivity factors to the first few years of the 30-year exposure duration. Therefore, the project would result in a significant cancer risk if NTDE caused cancer. After application of mitigation, the estimated cancer burden is reduced to 0.1. The analysis using the “Current OEHHA Guidance” was provided in the final EIR to allow decision makers and the public to see the cancer-related impacts of the Project on the assumption that NTDE does cause cancer, contrary to what was found by the HEI study.

b. Cumulative Health Risk Impacts

Potentially Significant Impact. The EIR evaluated and concluded that construction and operation of the Project would have the potential to result in a cumulative significant health risks.

Finding: Potential impacts of the Project related to cumulative cancer risk and cancer burden impacts are discussed in detail in Section 4.3 of the FEIR Volume 3. Based on the entire record before us, this Council finds that potentially significant impacts related to cumulative cancer risk impacts would be

reduced to a less than significant level with implementation of **Mitigation Measures M 4.1.6.1A, 4.3.6.2A, 4.3.6.2B, 4.3.6.2D, 4.3.6.3A, 4.3.6.3B, 4.3.6.3C, 4.3.6.3D, and 4.3.6.3E.**

Facts in Support of the Finding: The Health Risk Assessment (HRA) conducted for the Project identified the increase in health risks to the nearby sensitive receptors from the Project's air pollutant emissions. SCAQMD recommends that any given project's potential contribution to cumulative cancer risk impacts should be assessed using the same significance criteria as for project-specific impacts. Therefore, a project that has the potential to exceed any significance threshold on its own would also result in a cumulatively considerable significant impact. As noted in previously discussed Impact 4.3.6.5, the project would implement mitigation measures resulting in the cleanest on-road and off-road diesel equipment and the emissions from such equipment have been shown to not cause cancer.

As set forth in Section 4.3 of the FEIR, Volume 3, the Project would contribute diesel particulate matter to the area during Project construction and operation. However, since the Project would implement mitigation measures resulting in the cleanest on-road operational and off-road construction equipment and emissions from such equipment have been shown through recent extensive health effects research to not cause cancer in laboratory studies, the Project would result in a less than significant impact on a project and cumulative basis.

4. Biological Resources

a. Endangered and Threatened Species

Potential Significant Impact: The EIR evaluated and concluded that the Project has the potential to affect species that are listed as endangered or threatened.

Finding: Potential impacts of the Project related to endangered and threatened species are discussed in detail in Section 4.4 of the FEIR Volume 3. Based on the entire record before us, this Council finds that potentially significant impacts related to endangered and threatened species would be reduced to a less than significant level with implementation of **Mitigation Measures 4.4.6.1.A and 4.4.6.1.B.**

4.4.6.1A All Plot Plan applications within Planning Areas 10 and 12 (i.e. adjacent to the San Jacinto Wildlife Area as shown in Final EIR Volume 2 Figure 4.1.6B) shall provide a 250-foot setback from the southerly property line. Permitted uses within this setback area include landscaping, drainage and water quality facilities, fences and walls, utilities and utility structures, maintenance access drives, and similar related uses. No logistics buildings or truck access/parking/maneuvering facilities are permitted in this setback

area.

In addition, logistics buildings within Planning Areas 10 and 12 may not be located within 400 feet of the southerly property line. All development proposals in Planning Areas 10 and 12 shall include a minimum six-foot tall chain link fence or similar barrier to separate warehouse activity from the setback area. This fence/barrier shall have metal mesh installed below and above ground level to prevent animals from moving between the development area and the setback area.

Within Planning Areas 10 and 12, all truck activity areas adjacent to the 250-foot buffer area along the southern property line shall be enclosed by minimum 11-foot tall solid walls to reduce noise and lighting impacts on the adjacent property. This measure shall be implemented to the satisfaction of the Planning Official.

A preliminary landscape plan for the 250-foot setback area shall be submitted with all Plot Plan applications for lots adjacent to the California Department of Fish and Wildlife property. Precise landscape plans shall be submitted with any grading permit for said lots and must be approved prior to the issuance of any building permit on said lots. The landscape plan shall be prepared by a licensed landscape architect in consultation with a qualified biologist and shall be consistent with the design standards contained in the World Logistics Center Specific Plan. No plant species listed in Section 6.1.4 of the Western Riverside County Multiple Species Habitat Conservation Plan shall be installed within the setback area. Cottonwood trees shall be planted within the setback area consistent with the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development Division Manager.

4.4.6.1B

Each Plot Plan application in Planning Areas 10 and 12 shall provide runoff management and water quality facilities adequate to minimize downstream erosion, maintain water quality standards and retain pre-development flows in a manner meeting the approval of the City Engineer. All drainage improvements shall be designed to minimize runoff and erosional impacts on adjacent property. This measure shall be implemented to the satisfaction of the Land Development Division Manager of Public Works.

Facts in Support of the Finding: According to Section 4.4 of the FEIR Volume 3, of the special-status plant and animal species that have the potential to occur within the general vicinity of the Project area, 17 plant and animal species are designated as endangered or threatened by State and/or Federal authorities

(Table 4.4.F, FEIR, Volume 3, pg. 4.4-73). None of these species was observed or is believed to be present on the Project site; it is possible the listed birds may utilize the SJWA on a seasonal basis.

The potential for occurrence determination was based on the results of focused biological resource surveys, and/or the lack of suitable habitat in the Project limits for the referenced species. No Federal or State endangered/threatened species were detected on the Project site during the focused biological resource surveys. However, to err on the side of caution, it is reasonable to conclude that, at a minimum, indirect impacts to listed species may be significant, and mitigation is required.

The 250-foot setback identified in **Mitigation Measure 4.4.6.1A**, and the presence of the CDFW Conservation Buffer Area, will effectively mitigate potential indirect impacts of air pollutants, including diesel particulate matter, on wildlife within the SJWA. Compliance with the off-site lighting guidelines of the Specific Plan, compliance with the night lighting standards in Section 9.08.100 of the City Municipal Code, and implementation of Aesthetics **Mitigation Measure 4.1.6.4A** will help reduce lighting impacts on the SJWA to less than significant levels.

Compliance with the Specific Plan, Municipal Code, and implementation of the recommended **Mitigation Measures 4.4.6.1A** and **4.4.6.1B** will help reduce Project impacts to listed species to less than significant levels. (FEIR Volume 3 pgs. 4.4-74 to 4.4-84).

b. Adopted Habitat Conservation Plans

Potential Significant Impact: Section 4.4 of FEIR Volume 3, evaluated and concluded that the Project has the potential to conflict with adopted habitat conservation plans, which includes the MSHCP for Western Riverside County and the Stephens' Kangaroo Rat (SKR) HCP.

Finding: With implementation of **Mitigation Measures 4.4.6.1A, 4.4.6.1B, 4.4.6.2A, and 4.4.6.2B**, potential impacts related to potential adverse impacts to adopted habitat conservation plans will be reduced to less than significant levels.

4.4.6.2A Each Plot Plan application shall include a focused plant survey of the proposed development site prepared by a qualified biologist to identify if any of the following sensitive plants (i.e., Coulter's goldfields, smooth tarplant, Plummer's mariposa lily, or thread-leaved brodiaea) are present. If any of the listed plants are found, they may be relocated to the 250-foot setback area outlined in the Specific Plan and discussed in Mitigation Measure 4.4.6.1A. Alternatively, at the applicant's discretion, an impact fee may be paid to the Western Riverside County Regional Conservation Authority (RCA) or

other appropriate conservation organizations to offset for the loss of these species. This measure shall be implemented to the satisfaction of the Planning Official.

4.4.6.2B Prior to the approval of any tentative maps for development including or adjacent to any Criteria Cells identified in the Western Riverside County Multiple Species Habitat Conservation Plan, the applicant shall prepare and process a Joint Project Review (JPR) with the Riverside County Resource Conservation Agency (RCA). All criteria cells shall be identified on all such tentative maps. This measure shall be implemented to the satisfaction of the City Planning Division and Riverside County Resource Conservation Agency (“RCA”).

Facts in Support of the Finding: According to Section 4.4 of the FEIR Volume 3, the Project site is within the SKR HCP Fee Area. The SKR is relatively widespread throughout the SKR HCP Fee Area, but the main blocks of occupied habitat are concentrated in several Core Areas that must be conserved. The Project site is not within an SKR Core Area. The long-term SKR HCP provides Take Authorization for the SKR within its boundaries. The core reserves established by the SKR HCP will be managed as part of the MSHCP Conservation Area consistent with the provisions of the SKR HCP. Focused surveys for Stephens’ kangaroo rat will not be required for this Project because the Project lies within the SKR Fee Area; therefore, no requirements under the SKR HCP other than payment of a local mitigation fee are required.

The Project area is located within the Reche Canyon/Badlands Area of the MSHCP. Development of the Project area would not conflict with the conservation goals established by the MSHCP for Cell Group X or Cell Group E. In addition, no conflict from development would occur in relation to the Reche Canyon/Badlands Area Plan, the Area Plan Subunit 4, the Area Plan Subunit 3, Proposed Core 3, or Existing Core H.

No development is proposed within the portion of the Project area that lies within Cell Group D and the SJWA. This area is already owned by the State and managed by the CFDW. However, development that will be adjacent to the SJWA property may cause significant indirect impacts to species within the SJWA, which will require mitigation (i.e., designing an appropriate buffer along this “urban edge” will help minimize potential impacts on the SJWA).

The Project area is not adjacent to any Cores or Linkages identified in the MSHCP. However, it is adjacent to the SJWA and is subject to the Project guidelines provided in MSHCP Section 6.1.4

(Guidelines Pertaining to the Urban/Wildlands Interface). The Project is also required to adhere to the Best Management Practices (BMPs) found in Appendix C of the MSHCP.

The Project does not propose to alter land use in any way that would adversely affect Cores, Linkages, or Reserve Assembly within the Reche Canyon/Badlands Area Plan.

The Project is not located within any Amphibian, Mammalian, or Special Linkage Areas identified by the MSHCP. The Project is in an area requiring burrowing owl surveys, is within the MSHCP Criteria Area Species Survey Area (CASSA), and is within the Narrow Endemic Plant Species Survey Area (NEPSSA).

The MSHCP and its Implementation Agreement contain a fee mitigation program pursuant to which local agencies collect development impact fees and remit such fees to the Riverside Conservation Authority (RCA). These fees are in turn used to acquire lands that are suitable for habitat preservation for species covered by the MSHCP. Payment of the local MSHCP mitigation fee will be required of the Project prior to the issuance of building permits.

From available information, potential indirect impacts to avian and other biological resources within Mystic Lake and the SJWA will be reduced to less than significant levels by the creation of a 250-foot on-site setback or buffer area in **Mitigation Measure 4.4.6.1A**, which will be in addition to the existing setback provided by the CDFW Conservation Buffer Area just south of the development area.

Participation in the MSHCP and contribution of MSHCP provides compensation for the loss of raptor foraging habitat due to approved projects. Typically, a Project proponent would participate as outlined in the MSHCP, so that loss of raptor foraging habitat is typically considered to be less than significant and no mitigation is required.

Narrow Endemic Plant Species. No Narrow Endemic plant species are anticipated to occur in the Project area and no additional action is required.

Criteria Area Plant Species. No Criteria Area plant species are anticipated to occur on the Project area and no additional action is required.

Riparian/Riverine Areas and Vernal Pools. Drainage Features 7, 8, 9, 12, and 15 contain riparian/riverine areas, as designated by the MSHCP. The Project area does not contain habitat suitable for covered riparian species, such as least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. No vernal pools or ephemeral ponds were observed on the Project area and no suitable habitat for any fairy shrimp species was identified on site. No additional mitigation regarding vernal pools or vernal pool species is required. A programmatic-level Determination of Biologically Equivalent or Superior

Preservation (DBESP) was prepared by MBA in 2013 to outline specific requirements for Project related impacts to these features in the future. A Project-specific DBESP will be required during each development Project.

Specific Plan Design Features. The Project is consistent with the major MSHCP requirements relative to core areas, criteria cells, threatened and endangered species. In addition, the Project complies with the MSHCP guidelines for urban/wildland interface, riparian/riverine areas, or related buffers (with implementation of **Mitigation Measure 4.4.6.1A**). In addition, future development will be required to demonstrate that it is also consistent with all MSHCP requirements, including indirect impacts such as lighting, noise, and air pollution effects.

Regulatory Compliance. Stephens' kangaroo rats have a low potential to occur within the study area. While the study area is not within the SKR Core Reserve Area, the SKR HCP Implementing Agreement requires payment for loss of habitat within defined areas. The entire study area lies within the fee area. An assessment of individual actions for development within the WLC Specific Plan would be required prior to any implementation. The number of acres of disturbance associated with the development and any off-site improvements shall require payment to comply with the SKR HCP. In addition, prior to issuance of a grading permit on each Project, applicants will be required to pay the mandatory mitigation fee for the MSHCP. The mitigation fee is a per acre fee for commercial or industrial development.

In addition, the previously outlined **Mitigation Measures 4.4.6.1A, 4.4.6.1B, and 4.4.6.1C** will also help reduce potential direct and indirect impacts to biological resources covered by the MSHCP.

With implementation of **Mitigation Measures 4.4.6.1A and 4.4.6.1B and 4.4.6.2A and 4.4.6.2B**, potential impacts related to MSHCP consistency will be reduced to less than significant levels. (FEIR Volume 3 pgs. 4.4-85 to 4.4-88).

c. Jurisdictional Delineation, Riparian Habitat or Other Sensitive Natural Communities

Potential Significant Impact: The EIR evaluated and concluded that the Project has the potential to result in significant impacts to jurisdictional land, riparian habitat, and sensitive natural communities and may require subsequent permits from various resource agencies.

Finding: Implementation of the following mitigation measures will reduce the potential adverse impacts to riparian habitat or other sensitive natural communities to less than significant:

4.4.6.3A

Prior to the issuance of grading permits the applicant shall secure a jurisdictional determination from the United States Army Corps of Engineers (USACE) and confirm with the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) if drainage features mapped on the property to be developed are subject to jurisdictional authority. If the features are subject to regulatory protection, the applicant will secure permit approvals with the appropriate agencies prior to initiation of construction. Compensatory riparian habitat mitigation will be provided at a minimum ratio of 1:1 (replacement riparian habitat to impacted riparian habitat) to ensure no net loss of riparian habitat or aquatic resources. It should be noted that this is a minimum recommended ratio but the actual permitting ratio may be higher. Detention basins will be oversized to accommodate the provision of areas of riparian habitat. Maintenance of the basins will be limited to that necessary to ensure their drainage and water quality functions while encouraging habitat growth. Riparian habitat mitigation will be provided concurrent to or prior to impacts. A Compensatory Mitigation Plan will be prepared for all unavoidable impacts and will be consistent with the United States Army Corps of Engineers (USACE)/United States Environmental Protection Agency's Compensatory Mitigation for Losses of Aquatic Resources; Final Rule and the United States Army Corps of Engineers Standard Operating Procedure for Determination of Mitigation Ratios.

The applicant shall consult with United States Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board to establish the need for permits based on the results of a recent jurisdictional delineation and final design plans for each of the proposed the facilities. Consultation with the three agencies shall take place and appropriate permits obtained for project-level development. Compensation for losses associated with the altering of drainages on site shall be in agreement with the permit conditions and in coordination with compensation outlined below.

Mitigation will consist of onsite creation, offsite creation, or purchase of mitigation credits from an approved mitigation bank. As outlined in the WLC programmatic DBESP report, onsite riparian habitat will be created at a minimum 1:1 ratio due to the poor quality of onsite habitat. New habitat will be created within the onsite detention/infiltration basins to the extent allowed by the resource agencies to reduce storm flows, improve water quality, and reduce sediment transport. Habitat creation will

include the installation of mule fat scrub or similar riparian scrub habitat to promote higher quality riparian habitat, but still maintain the basins for their primary role as detention facilities. The use of these areas as conservation areas would require consent from CDFW and the City of Moreno Valley (MM BIO-2b and MM DBESP 1 through 3).

4.4.6.3B

As required by the Resource Conservation Agency (RCA), a program-level Determination of a Biological Equivalent or Superior Preservation (DBESP) for impacts to Riverine/Riparian habitat has been prepared and shall be approved by the Resource Conservation Agency prior to project approval. The Determination of a Biological Equivalent or Superior Preservation includes a general discussion of mitigation options for impacts to riverine/riparian areas as well as general location and size of the mitigation area and includes a monitoring program.

If impacts to riparian habitat within the World Logistics Center Specific Plan (WLCSP) cannot be avoided at the time of specific development, then a separate project-level Determination of Biologically Equivalent or Superior Preservation (DBESP) shall be prepared to identify project-specific impacts to riparian habitat and incorporate mitigation options identified in Mitigation Measure 4.4.6.3A.

A project-level Determination of a Biological Equivalent or Superior Preservation for each specific development shall be prepared to document measures to reduce impacts to riparian/riverine habitats in accordance with the Western Riverside County Multiple species Habitat Conservation Plan (MSHCP). The project-level Determination of a Biological Equivalent or Superior Preservation shall include specific measures to reduce impacts to riparian areas and provide mitigation in the form of onsite preservation of riparian areas and/or a combination of compensation through purchase and placement of lands with riparian/riverine habitat into permanent conservation through a conservation easement and/or restoration or enhancement efforts at offsite or onsite locations. Therefore, mitigation required for compensation for impacts to riparian/ riverine areas will require a minimum of 1:1 mitigation ratio of riparian/riverine mitigation land.

As outlined in the WLC programmatic DBESP, erosion control improvements will be installed within Drainage 9 to reduce sediment transport, and additional riparian habitat will be enhanced within this drainage following the installation of the erosion control improvements (MM DBESP 4 and 5).

4.4.6.3C. Prior to issuance of any grading permit for any offsite improvements that support development within the World Logistics Center Specific Plan, the developer shall retain a qualified biologist to prepare a jurisdictional delineation (JD) for any drainage channels affected by construction of the offsite improvements. This jurisdictional delineation shall be submitted to the U.S. Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW) for review and concurrence. If the offsite improvements will not affect any identified jurisdictional areas, no United States Army Corps of Engineers permitting is required. However, permitting through the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (i.e., Streambed Alternation Agreement) may still be required for these improvements. The applicant shall consult with United States Army Corps of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board to establish the need for permits based on the results of the 2012 jurisdictional delineation and final design plans for each of the proposed the facilities. Consultation with the three agencies shall take place and appropriate permits obtained. Compensation for losses associated with any altered offsite drainages shall be in agreement with the permit conditions. Any landscaping associated with these offsite improvements shall use only native species to help protect biological resources residing within or traveling through these drainages per Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Table 6.1.2. This measure shall be implemented to the satisfaction of the City Planning Division in consultation with the U.S. Fish and Wildlife Service, U.S. Army Corps. of Engineers, and the California Department of Fish and Wildlife.

Facts in Support of the Findings: According to Section 4.4 of the FEIR Volume 3, a total of 15 primary drainage features were identified during this survey and a number of sub-drainages or tributaries were also identified. Jurisdiction for each drainage and/or sub-drainage or tributary was evaluated for jurisdiction under Section 404 and 401 of the CWA as administered by USACE and RWQCB, respectively; Porter Cologne as administered by the RWQCB; and Section 1600 of the Fish and Game Code as administered by the CDFW.

There are two drainage features that are completely isolated, Drainage Features 3 and 14. Drainage Feature 3 is an isolated temporary water quality facility serving the new Skechers building. This feature was created in an existing upland area and will eventually be converted into an underground storm drainage system. The second feature (consisting of two small basins) was created in an upland area to contain polluted runoff from a now-abandoned cattle operation. The eastern feature (Feature 14) is

dominated by non-native tree species and contains no native riparian habitat. The western feature contains a mix of non-native trees and native riparian habitat. There is no evidence of ponding and the basin is no longer in use. These basins no longer serve any water quality function and are therefore not considered to be isolated waters of the State under the Porter Cologne Act.

The EIR concludes that two of the drainages on the project site are under the jurisdiction of the USACE (Drainages 12 and 15), and several additional drainages are under the jurisdiction of the CDFW and RWQCB (Drainages 7, 8, 9, 12, and 15). Drainage Feature 7, 8, 9, 12, and 15 within the WLC project are considered riparian/riverine areas, as defined by MSHCP.

The Project area does not contain habitat suitable for sensitive riparian species, such as least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. Additionally, no vernal pools or ephemeral ponds were observed on the Project area and no suitable habitat for any fairy shrimp species was identified on site.

Raptor Foraging Habitat. The WLC Specific Plan and off-site facilities contain flat, open areas with sparse vegetation, which could be considered foraging habitat for some raptor species. Due to the regular, heavy disturbance associated with the various agricultural activities in the WLC Specific Plan and off-site facilities resulting in a rather limited prey base, and the limited size of the site in relation to the expansive foraging habitat in the near vicinity including both the CDFW Conservation Buffer Area and the SJWA, LPSRA and the extensive Badlands to the east, the foraging habitat on site is considered marginally suitable and an adverse but not significant impact to raptor foraging habitat is anticipated.

Therefore, **Mitigation Measures 4.4.6.3A through 4.4.6.3C** will help ensure there will be no significant impacts to riparian areas associated with Waters of the U.S. or Waters of the State as a result of future development within the Project.

With implementation of **Mitigation Measures 4.4.6.1A, 4.4.6.1B, 4.4.6.3A, and 4.4.6.3A through 4.4.6.3C**, potential impacts to riparian habitat or other sensitive natural communities, including on-site drainages, will be reduced to less than significant levels. (FEIR Volume 3 pgs. 4.4-89 to 4.4-92).

d. Candidate, Non-listed Sensitive, or Other Special Status Species

Potential Significant Impact: The EIR evaluated and concluded that the Project has the potential to affect migratory bird species including the burrowing owl, designated “species of special concern” by the California Department of Fish and Wildlife; and the Los Angeles Pocket Mouse (LAPM).

Finding: Implementation of **Mitigation Measures 4.4.6.4A through 4.4.6.4K** will reduce the potential

adverse impacts to sensitive or special status species to less than significant:

Migratory/Nesting Birds

- 4.4.6.4A** Pursuant to the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGF), site preparation activities (removal of trees and vegetation) shall be avoided during the nesting season of potentially occurring native and migratory bird species (generally February 1 to August 31). If site preparation activities must occur during the nesting season, a pre-activity field survey shall be conducted by a qualified biologist prior to issuance of grading permits for such development. The survey shall determine if active nests of species protected by the Migratory Bird Treaty Act or California Fish and Game Code are present in the construction zone. If active nests of these species are found, the developer shall establish an appropriate buffer zone with no grading or heavy equipment activity within of 500 feet from an active listed species or raptor nest, 300 feet from other sensitive or protected bird nests (non-listed), 250 feet from passerine birds, or 100 feet for sensitive or protected songbird nests. All construction activity within the vicinity of active nests must be conducted in the presence of a qualified biological monitor. Construction activity may encroach into the buffer area at the discretion of the biological monitor in consultation with CDFW. In the event no special status avian species are identified within the limits of disturbance, no further mitigation is required. In the event such species are identified within the limits of ground disturbance, Mitigation Measure 4.4.6.4B shall also apply. This measure shall be implemented to the satisfaction of the City Planning Division.
- 4.4.6.4B** If it is determined that project-related grading or construction will affect nesting migratory bird species, no grading or heavy equipment activity shall take place within the limits established in Mitigation Measure 4.4.6.4A until it has been determined by a qualified biologist that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow. This measure shall be implemented to the satisfaction of the City Planning Division.
- 4.4.6.4C** The loss of foraging habitat for golden eagle and white-tailed kite will be mitigated by payment of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) fee and the creation of a landscaped buffer area adjacent to the San Jacinto Wildlife Area property (SJWA). First, the payment of the Western Riverside County Multiple species Habitat Conservation Plan fee will be required on a project-by-project

basis. Second, a 250-foot setback as described in Mitigation Measure 4.4.6.1A will be established within the World Logistics Center Specific Plan area. This area will reduce impacts to raptor species foraging in the adjacent San Jacinto Wildlife Area open space areas.

Burrowing Owl

4.4.6.4D A pre-construction clearance survey for burrowing owl shall be conducted by a qualified biologist no more than thirty (30) days prior to any grading or ground disturbing activities within the project area.

In the event no burrowing owls are observed within the limits of ground disturbance, no further mitigation is required.

If construction is to be initiated during the breeding season (February 1 through August 31) and burrowing owl is determined to occupy any portion of the disturbance area during the 30-day pre-construction survey, construction activity shall maintain a 500-foot buffer area around any active nest/burrow until it has been determined that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow. If this avoidance buffer cannot be maintained, consultation with the California Department of Fish and Wildlife (CDFW) shall take place and an appropriate avoidance distance established. No disturbance to active burrows shall occur without appropriate permitting through the Migratory Bird Treaty Act and/or California Department of Fish and Wildlife.

If active burrowing owl burrows are detected outside the breeding season (September through January), or within the breeding season but owls are not nesting or in the process of nesting, active and/or passive relocation may be conducted following consultation with the California Department of Fish and Wildlife. A relocation plan may be required by California Department of Fish and Wildlife if active and/or passive relocation is necessary. The relocation plan will outline the basic process and provides options for avoidance and mitigation. Artificial burrows -may be constructed within the buffer area south of the World Logistics Center Specific Plan. Construction activity may occur within 500 feet of the burrows at the discretion of the biological monitor in consultation with CDFW.

A relocation plan may be required by California Department of Fish and Wildlife if active or passive relocation is necessary. Artificial burrows may be constructed within appropriate burrowing owl habitat within the proposed open space/conservation area

(Planning Area 30), a 74.3-acre area in the southwest portion of the Specific Plan. This area abuts the Lake Perris State Recreation Area (LPSRA) which is already in conservation. If suitable habitat is not present in Planning Area 30, owls may be relocated to the SJWA, the 250-foot buffer area or other suitable on-site or off-site areas. Construction activity may occur within 500 feet of the burrows at the discretion of the biological monitor.

Los Angeles Pocket Mouse

4.4.6.4E Prior to the approval of any Plot Plans proposing the development of land including or adjacent to Drainage 9, a protocol survey for the Los Angeles Pocket Mouse (LAPM), including 100 feet upstream and downstream of the affected reach shall be prepared by a qualified biologist and submitted to the City. If the affected drainage is not occupied, the area is considered not to be occupied and development can continue without further action. If the species is found within the specific survey area, no development shall occur until an appropriate mitigation fee is paid or appropriate amount of land set aside on the project site or off site to compensate for any loss of occupied Los Angeles Pocket Mouse habitat. Alternatively, individuals may be relocated to the 250-foot setback zone along the southern boundary of the property identified in Mitigation Measure 4.4.6.1A, or other appropriate areas as determined by the United States Fish and Wildlife Service. If necessary, this measure shall also be coordinated with Mitigation Measure 4.4.6.2B regarding preparation and processing of a Determination of a Biological Equivalent or Superior Preservation report. This measure shall be implemented to the satisfaction of the City Planning Division.

Resource Management

4.4.6.4F Prior to approval of any discretionary permits for development within Planning Areas 10 and 12, a Biological Resource Management Plan (BRMP) shall be prepared to prescribe how the 250-foot setback area outlined in Mitigation Measure 4.4.6.1A will be developed and maintained. This plan will identify frequent and infrequent vegetation management requirements (i.e., removal of invasive plants) and the planting and maintaining trees to provide roosting and nesting opportunities for raptors and other birds. The Biological Resource Management Plan will also describe how relocation of listed or sensitive species will occur from other locations as outlined in Mitigation Measures 4.4.6.2A, 4.4.6.4D, and 4.4.6.4E.

The Biological Resource Management Plan shall be reviewed and approved by the Planning Official in consultation with the San Jacinto Wildlife Area Manager. The Biological Resource Management Plan shall cover all the land within the 250-foot setback zone within Planning Areas 10 and 12. Implementation of the plan shall be supervised by a qualified biologist, to the satisfaction of the City Planning Division.

- 4.4.6.4G** Mitigation Measure 4.4.6.1A specifies that a landscape plan shall be submitted with any development proposal for lots adjacent to the San Jacinto Wildlife Area (SJWA) property prior to issuance of a precise grading permit. The landscape plan shall be prepared by a licensed landscape architect in consultation with a qualified biologist and shall be consistent with the design standards contained in the Specific Plan. No plant species listed in Section 6.1.4 or Table 6.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) shall be installed within the setback area. In conjunction with development adjacent to the San Jacinto Wildlife Area (SJWA), cottonwood trees shall be planted within the 250-foot setback area, consistent with the World Logistics Center Specific Plan plant palette (per DBESP MM 8).

During construction, the runoff leaving construction areas will be directed to onsite detention basins and away from downstream drainage features located offsite. All projects within the WLCSP will be required to prepare a Storm Water Pollution Prevention Plan (as outlined in MM 4.9.6.2B). Regarding the 250-foot setback area, pedestrian and vehicular access to areas of riparian/riverine habitat will be prohibited except for controlled maintenance access. Finally, no grading shall be permitted within conserved riparian/riverine habitat areas except for grading necessary to establish or enhance habitat areas (DBESP MM 6, 7, 9, and 10).

- 4.4.6.4H** As outlined in Mitigation Measure 4.4.6.1A, development adjacent to the 250-foot open space setback shall have a six-foot chain link fence or similar barrier to help separate human activity and the buffer area. Any chain link fencing installed on any properties adjacent to the 250-foot buffer area shall have metal mesh installed below and above ground level to prevent animals from accessing new development areas.

- 4.4.6.4I** The individual property owner and/or Property Owners Association (POA) as appropriate shall be responsible for maintaining the various onsite landscaped areas, open improved or natural drainage channels, and detention or flood control basins in a manner that provide for fuel management and vector control pursuant to standards maintained by the City Fire Marshall and County Department of Environmental Health- Vector Control

Group. This measure requires the individual owner or Property Owners Association (POA) to manage vegetation in and around these areas or improvements so as to not represent a fire hazard as defined by the City Fire Department through the substantial buildup of combustible materials. This measure also requires the individual owner or Property Owners Association to manage vegetation and standing water in drainage channels and basins such that they do not encourage or allow vectors to occur (primarily rats and mosquitoes). Runoff shall not be allowed to stand in channels or basins for more than 72 hours without treatment or maintenance to prevent establishment of mosquitoes per published County vector control guidelines and “Best Management Practices for Mosquito Control on California State Properties” which is available from the California West Nile Virus website at <http://www.westnile.ca.gov/resources>. This measure shall be implemented by the Property Owners Association in consultation with the City Fire Department and Riverside County Department of Environmental Health – Vector Control Group.

4.4.6.4J

A Fuel Management Plan shall be prepared on a project-by-project basis for those Planning Areas adjacent to the south and east boundary of the World Logistics Center Specific Plan adjacent to Western Riverside County Multiple Species Habitat Conservation Plan Conservation Areas. The Fuel Management Plan shall be prepared by the project proponent and submitted for approval to the prior to plot plan approval for those projects on the southern and eastern Western Riverside County Multiple Species Habitat Conservation Plan boundary. Per the Western Riverside County Multiple Species Habitat Conservation Plan guidelines, the Fuel Management Plan shall include the following:

- A plant palette of adequate plant species that may be planted within the Fuel Management Area, which will be approved by a biologist familiar with the plant requirements of the area.
- A list of non-native invasive plants that are prohibited from installation.
- Maintenance activities and a maintenance schedule.
- Fuel modification zones shall be mapped and include an impact assessment as required under California Environmental Quality Act guidelines for a project-level analysis. The plan shall demonstrate that the adjacent Western Riverside County Multiple Species Habitat Conservation Plan Areas are adequately protected from expected fire risks.

4.4.6.4K Prior to approval of any plot plans for development adjacent to the SJWA, the applicant shall demonstrate that direct light rays have been contained within the development area, per requirements of the MSHCP. Section 6.0 which states, “Night lighting shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting.” This measure shall be implemented to the satisfaction of the City Planning Division.

Facts in Support of the Finding: According to Section 4.4 of the FEIR Volume 3, no USFWS designated Critical Habitat for any species is located within the Project area; therefore, no further action with regard to Critical Habitat is necessary.

Migratory or Nesting Birds. The 2013 MBA report found the extensive agriculture plant communities in the WLC Specific Plan and offsite facilities provide suitable nesting habitat for ground-nesting avian species such as western meadowlark (*Sturnella neglecta*) and burrowing owl. Suitable habitat for shrub and tree nesting species such as red-tailed hawk, black phoebe (*Sayornis nigricans*), and house finch occur along the edges of existing development surrounding the WLC Specific Plan and offsite facilities as well as isolated, remnant patches of vegetation in undisturbed portions of the WLC Specific Plan and offsite facilities. Therefore, portions of the WLC Specific Plan and offsite facilities and immediately adjacent to the WLC Specific Plan and offsite facilities provide suitable nesting habitat for migratory birds protected under the MBTA and California Fish and Game Code.

The Project area contains suitable nesting habitat for several tree-, shrub-, and ground-nesting avian species. Therefore, MBA recommends construction activities avoid the avian nesting season, from February to August, if possible. If construction activity must take place during the nesting season, a pre-construction nesting bird survey should be conducted prior to any ground disturbance activities. The survey can be conducted in conjunction with the pre-construction survey for burrowing owl.

If passerine birds are found to be nesting or if there is evidence of nesting behavior within 250 feet of the impact area, a 250-foot setback will be required around the nest where no vegetation disturbance will be permitted. For raptor species such as hawks and owls, this buffer should be expanded to 500 feet. A qualified biologist will be required to closely monitor nests until it is determined that they are no longer active, at which time construction activity in the vicinity of nests could continue. Construction activity may proceed within the buffer area at the discretion of the biological monitor. **Mitigation Measures 4.4.6.4A through 4.4.6.4C** will ensure that impacts are less than significant.

Burrowing Owl. For those species that are not covered by the take and incidental take provisions of the MSHCP (e.g., burrowing owl), the MSHCP requirements dictate that further protective action be taken. While no burrowing owls were identified within the Project's area of disturbance, because suitable habitat is present within the Project area for the burrowing owl and because the species is highly mobile, a potential exists that, at some future date prior to Project development, this species may occupy the development sites. This is a potentially significant impact requiring mitigation. **Mitigation Measure 4.4.6.4D** will ensure that impacts are less than significant.

Los Angeles Pocket Mouse. Focused surveys for the LAPM were conducted in August 2005, June 2010, June 2012, and July 2013. Suitable habitat was found within Drainage Feature 9, one of the main drainage features located in the eastern end of the Project area. In its MSHCP Consistency Report, MBA concluded that LAPM is absent from the Project area. However, the Specific Plan indicates this drainage will remain in its present natural condition, except for the southern end as it becomes the Street H channel and outlets to the SJWA land to the south. Extensive surveys were completed in 2005, 2010, 2012, and 2013, which concluded that Los Angeles pocket mouse was not present. However, **Mitigation Measure 4.4.6.4E** will ensure that impacts are less than significant.

Plant Survey Areas. The Project limits are within MSHCP Survey Area 10 of the NEPSSA and MSHCP Survey Area 9 of the CASSA for plant species. The MSHCP requires that a habitat site assessment (HSA) be conducted for all proposed developments within Narrow Endemic Plant Species' Survey Areas (NEPSSAs) and Criteria Area Sensitive Plant Species' Survey Areas (CASSAs). The HSA for most NEPSSA and CASSA plants must be done during a normal rainfall year and/rainy season. If it is determined during the HSA that suitable soils and/or growing conditions are present on site to support identified NEPSSA species, a focused plant survey is required during the plant species blooming period.

Habitat suitability of the site for NEPSSA and CASSA species is detailed in the General Biological Resources and MSHCP Compliance Report (FEIR, Volume 3 Appendix E). None of the species analyzed in the NEPSSA or CASSAs is anticipated to occur on the WLC Project site. The implementation of the WLC Project would not affect the habitat or result in a direct impact for any special status plant species. **Mitigation Measure 4.4.6.2A** will ensure that impacts are less than significant.

In summary, implementation of the above-listed mitigation measures (**Mitigation Measures 4.4.6.4A** through **4.4.6.4K**) would reduce impacts to burrowing owl, migratory bird species, and Los Angeles pocket mouse to less than significant levels. (FEIR Volume 3 pgs. 4.4-92 to 4.4-98).

e. **Cumulative Biological Impacts**

Potential Significant Impact: Whether the Project in connection with past, current, and probably future projects would incrementally affect biological resources.

Findings: Potential impacts of the Project related to cumulative biological impacts are discussed in detail in Section 4.4 of the FEIR Volume 3. Based on the entire record before us, this Council finds that development of the Project will not result in significant cumulative impacts to biological resources; therefore, no mitigation is required.

Facts in Support of the Findings: According to Section 4.4 of the DEIR, the cumulative area for biological resources is the Western Riverside County MSHCP area. The MSHCP establishes a comprehensive, multi-jurisdictional program focused on the conservation of 146 species and their habitats in western Riverside County. As stated in its Conservation Element, the City reviews all public and private development and construction projects and other land use plans/activities within the MSHCP area to ensure compliance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP. As a signatory to the MSHCP Implementing Agreement, the City has been issued “Take Authorization,” which allows the implementation of land use decisions consistent with the MSHCP without individual authorization by State or Federal authorities. As required by the MSHCP, focused biological resource studies have been conducted to assess potential impacts associated with development of the proposed uses. Where impacts to special status bird species and jurisdictional areas have been identified, mitigation has been identified to reduce the Project specific impacts to a less than significant level. Additionally, the MSHCP and its Implementation Agreement contain a fee mitigation program pursuant to which local agencies collect development impact fees and remit such fees to the RCA. These fees are in turn used to acquire lands which are suitable for habitat preservation for species covered by the MSHCP. In fact, habitat lands created by the MSHCP also have biological benefits for species technically not covered by the MSHCP, such as the burrowing owl. Habitat acquired by the MSHCP may be suitable as owl habitat. The latest adjustment of the MSHCP fee mitigation (July 1, 2009) allows the collection of fees of \$6,597 per acre of industrial development. The payment of required MSHCP is a standard requirement for all development occurring within the MSHCP area.

The EIR determined that indirect impacts of the Project on the SJWA would be less than significant with mitigation, and the regional (cumulative) implications of the Project can be addressed through the fee payment program of the MSHCP because it provides a regional and comprehensive approach to conservation planning. For example, future development that impacts Drainage 9 would be required to prepare a DBESP report consistent with MSHCP requirements. Through the implementation of the stated

mitigation for Project-specific impacts, and the payment of required MSHCP mitigation fees, no significant cumulative effect on biological resources would result from the development of the proposed uses with implementation of the identified program mitigation measures. (FEIR Volume 3 pg 4.4-98).

5. Cultural Resources

a. Prehistoric Cultural Resources

Potential Significant Impact: The EIR evaluated and concluded that the Project could have an adverse effect on significant archaeological resource pursuant to Section 15064.5.

Finding: Implementation of the following mitigation measures will reduce the impact to unique archaeological resources to less than significant:

4.5.6.1A Prior to the approval of any grading permit for any of the “Light Logistics” parcels, the parcels shall be evaluated for significance by a qualified archaeologist. A Phase 1 Cultural Resources Assessment shall be conducted by the project archaeologist and an appropriate tribal representative(s) on each of the “Light Logistics” parcel to determine if significant archaeological or historical resources are present.

A Phase 2 significance evaluation shall be completed for any of these sites in order to determine if they contain significant archaeological or historical resources. Cultural resources include but are not limited to stone artifacts, bone, wood, shell, or features, including hearths, structural remains, or historic dumpsites. All resources determined to be prehistoric or historic shall be documented using DPR523 forms for archival research/storage in the Eastern Information Center (EIC). If the particular resource is determined to be not significant, no further documentation is required. If prehistoric resources are determined to be significant, they shall be considered for relocation or archival documentation. If any resource is determined to be significant, a Phase 3 recovery study shall be conducted to recover remaining significant cultural artifacts. If prehistoric archaeological/cultural resources are discovered during the Phase 1 survey and it is determined that they cannot be avoided through site design, they shall be subject to a Phase 2 testing program. The project archaeologist in consultation with appropriate tribal group(s) shall determine the significance of the resource(s) and determine the most appropriate disposition of the resource(s) in accordance with applicable laws, regulations and professional practices (per Cultural Report MM CR-1, MM CR-2, MM CR-7 Table 3, pg.74).

4.5.6.1B

Prior to the issuance of any grading or ground-disturbing permit for construction of off-site improvements a qualified archaeologist shall be retained to prepare a Phase I cultural resource assessment (CRA) of the project site if an up to date Phase I cultural resource assessment is not available for the site at the time of development per Cultural Report MM CR-5, Table 3, pg.74).

Appropriate tribal representatives as identified by the City shall be invited by the Project Archeologist to participate in this assessment.

If archaeological resources are discovered during construction activities, no further excavation or disturbance of the area where the resources were found shall occur until a qualified archaeologist evaluates the find. If the find is determined to be a unique archaeological resource, appropriate action shall be taken to (a) plan construction to avoid the archeological sites (the preferred alternative); (b) cap or cover archeological sites with a layer of soil before building on the affected project location; or (c) excavate the site to adequately recover the scientifically consequential information from and about the resource. At the discretion of the project archaeologist, work may continue on other parts of the project site while the unique archaeological resource mitigation takes place. This measure shall be implemented to the satisfaction of the Planning Official.

If the project archaeologist, in consultation with the monitoring Tribe(s), determines that the find is a unique archaeological resource, the resource site shall be evaluated and recorded in accordance with requirements of the State Office of Historic Preservation (OHP). If the resource is determined to be significant, data shall be collected by the qualified archaeologist and the findings of the report shall be submitted to the City. If the find is determined to be not significant no mitigation is necessary.

Should a future project-level analysis show that cultural resource site CA-RIV-3346 will be directly or partially impacted by project-level construction, an Addendum cultural resource report must be prepared and include an analysis of the alternatives associated with mitigation for impacts to this resource following CEQA Guidelines Section 15126.4(b)(3). This information must be included in any project-level CEQA compliance documentation. It should be noted that Phase 3 data recovery is an acceptable mitigation action under CEQA Guidelines Section 15126.4(b)(3)(C) (per Cultural Report MM CR-3, Table 3, pg.74).

Should it be determined through a future project-level EIR analysis that prehistoric cultural resource sites CA-RIV-2993 and/or CA-RIV-3347 shall be directly impacted by future construction, these sites must be Phase 2 tested for significance (per Cultural Report MM CR-4, Table 3, pg.74).

4.5.6.1C

Prior to the issuance of any grading permits a qualified archaeologist shall be retained to monitor all grading and shall invite tribal groups to participate in the monitoring. Project-related archaeological monitoring shall include the following requirements per Cultural Report MM CR-6, MM CR-8, Table 3, pg.74):

1. All earthmoving shall be monitored to a depth of ten (10) feet below grade by the Project Archaeologist or his/her designated representative. Once all areas of the development project that have been cut to 10 feet below existing grade have been inspected by the monitor, the Project Archaeologist may, at his or her discretion, terminate monitoring if and only if no buried cultural resources have been detected.
2. If buried cultural resources are detected, monitoring shall continue until 100 percent of virgin earth within the specific project area has been disturbed and inspected by the Project Archaeologist or his/her designated representative.
3. Grading shall cease in the area of a cultural artifact or potential cultural artifact as delineated by the Project Archaeologist or his/her designated representative. A buffer of at a minimum 25 feet around the cultural item shall be established to allow for assessment of the resource. Grading may continue in other areas of the site while the particular find are investigated; and
4. If prehistoric cultural resources are uncovered during grading, they shall be Phase 2 tested by the Project Archaeologist, and evaluated for significance in accordance with §15064.5(f) of the CEQA Guidelines. Appropriate actions for significant resources as determined by the Phase 2 testing include but are not limited to avoidance or capping, incorporation of the site in green space, parks, or delineation into open space. If such measures are not feasible, Phase 3 data recovery of the significant resource will be required, and curation of recovered artifacts and/or reburial, shall be required. A report associated with Phase 2 testing or Phase 3 data recovery must be delivered to the City and, if necessary, the museum where any recovered artifacts have been curated.

5. No further grading shall occur in the area of the discovery until the City approves specific actions to protect identified resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the City where they would be afforded long-term preservation to allow future scientific study.
6. The developer shall make reasonable efforts to avoid, minimize, or mitigate significant adverse impacts on cultural resources. The State Historic Preservation Office (SHPO) and local Native American tribes will be consulted and the Advisory Council on Historic Preservation will be notified within 48 hours of the find in compliance with 36 CFR 800.13(b)(3). This measure shall be implemented to the satisfaction of the Planning Official.

4.5.6.1D Prior to the issuance of any grading permit, the project archaeologist shall invite interested Tribal Group(s) representatives to monitor grading activities. Qualified representatives of the Tribal Group(s) shall be granted access to the project site to monitor grading as long as they provide 48-hour notice to the developer of their desire to monitor, so the developer can make appropriate safety arrangements on the site. This measure shall be implemented to the satisfaction of the Planning Official.

4.5.6.1E It is possible that ground-disturbing activities during construction may uncover previously unknown, buried cultural resources (archaeological or historical). In the event that buried cultural resources are discovered during grading and no Project Archaeologist or Historian is present, grading operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be retained to determine the most appropriate course of action regarding the resource. The Archeologist shall make recommendations to the City on the actions that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with §15064.5 of the *CEQA Guidelines*. Cultural resources could consist of, but are not limited to, stone artifacts, bone, wood, shell, or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of CEQA criteria. If the resources are determined to be unique historic resources as defined under §15064.5 of the *CEQA Guidelines*, appropriate protective actions for significant resources such as avoidance or capping, incorporation of the site in green space, parks, or

open space, or data recovery excavations of the finds shall be implemented by the project archaeologist and the City.

No further grading shall occur in the area of the discovery until the City and project archaeologist approve the measures to address these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the City where they would be afforded long-term preservation to allow future scientific study.

Facts in Support of the Finding: Based on Section 4.5 of the FEIR Volume 3, a reconnaissance pedestrian-survey for the Project site was conducted in November 2007. Although the Project site is located within the Moreno Hills Complex, no archaeological resources were identified on the Project site during the field survey, and the cultural resource assessment concluded the Project would have no significant impacts; however, there is a potential for Project grading to disturb previously undiscovered cultural resources. While there is no recorded or surface evidence that archaeological resources are present on site, the Project is located in an area with a high potential of containing prehistoric archaeological resources. Therefore, a potential exists that excavation and construction activities may uncover previously undetected prehistoric or historic cultural resources. Adherence to **Mitigation Measures 4.5.6.1A** through **4.5.6.1E** would reduce potential impacts to archaeological resources to a less than significant level. (FEIR, Volume 3 pgs. 4.5-17 to 4.5-21)

b. Historic Resources

Potential Significant Impact: The EIR evaluated and concluded that the Project could have a significant adverse effect on historic resources.

Findings: Implementation of the following mitigation measures will reduce the impact to historic resources to less than significant:

4.5.6.2A If any historic resources are found during implementation of Mitigation Measure 4.5.6.1A, the property owner shall offer any artifacts or resources to the Moreno Valley Historical Society (MVHS) or the Eastern Information Center/County Museum or the Western Science Center in Hemet as appropriate for archival storage. From the time any artifacts are turned over to the Moreno Valley Historical Society or other appropriate historical group, the property owner/developer shall have no further responsibility for their management or maintenance.

4.5.6.2B As part of construction of the trail segment connecting Redlands Boulevard to the California Department of Fish and Wildlife property, the developer shall contribute \$5,000 to the City for the installation of a historical marker acknowledging the passing of Juan Bautista de Anza through this area during his exploration of California. This measure shall be incorporated into trail plans for this segment which will be subject to review and approval by the City Park and Recreation Department in consultation with the Moreno Valley Historical Society.

4.5.6.2C Streets C and E shall follow the historical alignment of Alessandro Boulevard and shall be named Alessandro Boulevard.

Facts in Support of the Findings: According to Section 4.5 of the FEIR, Volume 3, the project site contains two previously identified historic sites: CA-RIV-4201H and CA-RIV-4210H. Both of these are historic-era homesteads and previously contained farm buildings and related out-buildings. They were located in the eastern portion of the Specific Plan, but MBA could find no remains of these facilities or related artifacts. The MBA report concludes the buildings were demolished and/or their materials removed for disposal or reuse at some point in the past.

There are seven rural residential structures and associated out-buildings currently present on the project site, and one (APN 478-220-009) near Redlands Boulevard contains a farm building that was built around 1900 and may be one of the oldest surviving buildings of the historic Moreno community.¹⁸ No other evidence of past structures or unique features was identified; however, access to the seven rural residential properties was not available at the time of survey, and it appears from general observations, historical aerial photographs, and historical records that one or more of these buildings may be older than 40 years. Without more information, there is a possibility that removal of these buildings could represent a significant impact to historic structures, features, or resources, and mitigation is required.

In addition, historical evidence indicates Juan Bautista de Anza traveled through the project area (i.e., along the base of Mt. Russell from south to northwest), which should be acknowledged as part of the trail proposed within the Specific Plan.

Alessandro Boulevard was designated as a City Landmark in 1988 (Resolution CPAB 88-2). Resolution CPAB 88-2 was designed to assure the maintenance, enhancement, or protection of a street of historical significance. Over the years various portions of Alessandro Boulevard have been modernized to enhance traffic flow throughout the City, but the original routing has remained unchanged. Alessandro Boulevard

¹⁸ *Cultural Resources Assessment*, Michael Brandman Associates, Inc., September 2014.

within the WLCSP would retain its original alignment but the roadway would be enhanced to serve modern traffic needs. This has been done in multiple areas along Alessandro Boulevard in the past to better serve the needs of the community. These changes have not impacted the integrity of the landmark status, as the significance of the Landmark status is associated with the original location of the boulevard since 1890 and the retention of the original name of the boulevard across the City. These aspects would remain and the impacts would not be considered significant since the California Register requires that a resource possess integrity, which is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance” (California Office of Historic Preservation 1999). To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Which of these factors is most important depends on the particular criterion under which the resource is considered eligible for listing (California Office of Historic Preservation 1999). Alessandro Boulevard integrity is retained in the original location, however, design, setting, materials feeling have changed over time through modifications to the road throughout the City and thus the impacts are not significant.

Approximately 1,350 feet of Alessandro Boulevard east of Merwin Street would be closed to through traffic to keep trucks from using Alessandro Boulevard through the residential neighborhood between Merwin Street and Wilmot Street. The loss of this portion of Alessandro Boulevard would not have a significant impact on the landmark status of the road, as the name would continue to be employed and the original routing would be retained throughout. These are the two key characters of the landmark status. This portion of road would be open to hikers and bikers and the closure will be designed to keep access open to non-vehicular users. Both the original route and name would be retained in keeping with the main aspects of the landmark designation.

Implementation of **Mitigation Measures 4.5.6.1A, 4.5.6.2A, and 4.5.6.2B**, will help reduce potential impacts to historical resources to less than significant levels. (FEIR, Volume 3 pgs. 4.5-21 to 4.5-26).

c. Paleontological Resources

Potential Significant Impact: The EIR evaluated and concluded that the Project could have an adverse effect on significant paleontological resource or site or unique geologic feature.

Findings: Implementation of the following mitigation measures will reduce the impact to unique paleontological resource or unique geologic feature to less than significant:

4.5.6.3A Prior to the issuance of any grading permits, a City-approved Paleontologist shall be retained to conduct paleontological monitoring as needed for all grading related to development. Development monitoring shall include the following actions:

1. Monitoring must occur in areas where excavations are expected to exceed twenty (20) feet in depth, in areas where fossil-bearing formations are found during grading, and in all areas found to contain, or are suspected of containing, fossil-bearing formations.
2. To avoid construction delays, paleontological monitors shall be equipped to salvage fossils and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates if they are unearthed.
3. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of specimens.
4. Monitoring may be reduced if the potentially fossiliferous units described herein are not present, or, if present, are determined upon exposure and examination by the Project Paleontologist to have low potential to contain fossil resources.

This measure shall be implemented to the satisfaction of the Planning Official. The Project Paleontologist and the Project Archaeologist described in Mitigation Measure 4.5.6.1C may be the same person if he/she meets the qualifications of both positions per Cultural Report MM PR-1, Table 4, pg. 76).

4.5.6.3B Prior to the issuance of any permits for the construction of off-site improvements, a qualified paleontologist shall conduct an assessment for paleontological resources on each off-site improvement location. If any site is determined to have a potential for exposing paleontological resources, the project paleontologist shall monitor off-site grading/excavation, subject to coordination with the City. Development monitoring shall include the following mitigation measures:

1. Monitoring must occur in areas where excavations are expected to reach fossil-bearing formations during grading. This monitoring must be conducted by the Project Paleontologist in all areas found to or suspected of containing fossil-bearing formations.

2. To avoid construction delays, the Project Paleontologist shall be equipped to salvage fossils and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates as they are unearthed.
3. The Project Paleontologist shall be empowered to temporarily halt or divert equipment to allow removal of specimens.
4. Monitoring may be reduced if the potentially fossiliferous units described herein are not present, or, if present, are determined upon exposure and examination by the Project Paleontologist to have low potential to contain fossil resources.

Facts in Support of the Findings: According to Section 4.5 of the FEIR, Volume 3, the Project site is located within an area that has a high potential to contain near-surface Pleistocene fossils.¹⁹ The paleontological literature search indicated that there is potential for significant, nonrenewable resources that to encountered during onsite construction activities. Therefore, a paleontological resources impact mitigation program (PRIMP), including excavation monitoring by a qualified paleontologist, is recommended for earthmoving activities in Pleistocene sediments on the Project site with potential to contain significant, nonrenewable paleontological resources. Although no paleontological resources were identified on site during the field survey, because of the location of the Project site and associated sensitivity for paleontological resources, the potential exists that paleontological resources maybe uncovered during construction. Adherence to the **Mitigation Measures 4.5.6.3A** and **4.5.6.3B** will reduce potential impacts to paleontological resources to a less than significant level. (FEIR, Volume 3 pgs. 4.5-26 to 4.5-27).

d. Cumulative Cultural Resources Impacts

Potential Significant Impact: The EIR evaluated and concluded that the Project could have an adverse effect on significant cumulative impact on cultural resources.

Findings: Implementation of **Mitigation Measures 4.5.6.1A** through **4.5.6.1E**, **4.5.6.2A** and **4.5.6.2B**, and **4.5.6.3A** and **4.5.6.3B** will reduce the cumulative impacts on cultural resources to less than significant.

Facts in Support of the Findings: According to Section 4.5 of the FEIR, Volume 3, Implementation of the project and related off-site improvements would require measures to identify, recover, and/or record any cultural and/or paleontological resource that may occur within the project limits. Although unlikely to occur, potential impacts associated with human remains would be reduced to a less than significant level

¹⁹ Ibid.

through adherence to existing State law. With implementation of the recommended mitigation measures, potential impacts to archaeological or paleontological resources from future development will be reduced to less than significant levels. Since this region contains archaeological, historical, and paleontological resources that have been found in the past, future development in the surrounding region may impact these resources as well. However, implementation of the mitigation measures outlined in this document, and other CEQA documents for development projects in the area, will help reduce potential impacts to cultural resources to less than significant levels. With implementation of the project-level mitigation for future development identified in Section 4.5.6, the Project will not have significant impacts related to cultural resources, and will also not make any significant contributions to cumulatively. (FEIR, Volume 3 pg. 4.5-27 to 4.5-28).

6. Geology and Soils

a. Fault Rupture

Potential Significant Impact: The EIR evaluated and concluded that the future development permitted by the project would locate development in an area susceptible to fault rupture.

Findings: Implementation of the following mitigation measures will reduce the impact related to fault rupture to less than significant:

- 4.6.6.1A** Prior to approval of any projects for development between Redlands Boulevard and Theodore Street, south of Dracaea Avenue (projected east from Redlands Boulevard), and the area south of Alessandro from the western boundary along the Mount Russell toe of slope easterly into the site 1,500 feet, the City shall determine if a detailed fault study of the Casa Loma Fault Zone area is required based on available evidence. If necessary, any additional geotechnical investigations shall be prepared by a qualified geologist and determine if structural setbacks are needed, and shall identify specific remedial earthwork and/or foundation recommendations. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the

investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Structures intended for human occupancy shall not be located within any structural setback zone as determined by those studies. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.

4.6.6.1B

Prior to approval of any projects for development within or adjacent to the San Jacinto Alquist-Priolo Earthquake Fault Zone, the City shall review and approve a geotechnical fault study prepared by a qualified geologist to confirm the alignment and size of any required building setbacks related to the fault zone. If necessary, this study shall identify a “special foundation or grading remediation zone” for the areas supporting structures intended for human occupancy where coseismic deformation (fractures) is observed. This zone shall be determined after subsurface evaluation based on proposed building locations. Specific remedial earthwork and foundation recommendations shall be evaluated as necessary based on proposed building locations. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.

This study may involve trenching to adequately identify the location of the Claremont segment of the San Jacinto Fault Zone that crosses the eastern portion of the World Logistics Center Specific Plan property. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.

4.6.6.1C Prior to the approval of grading permits, or permits for construction of off-site improvements, the City shall review and approve plans confirming that the project has been designed to withstand anticipated ground shaking and other geotechnical and soil constraints (e.g., settlement). The project proponent shall submit plans to the City as appropriate for review and approval prior to issuance of grading permits or issuance of permits for the construction of any offsite improvements. This measure shall be implemented to the satisfaction of the City Engineer

Facts in Support of the Findings: According to Section 4.6 of the FEIR, Volume 3, the western portion of the site is crossed by the City of Moreno Valley Seismic Zone, a postulated trace of the Casa Loma Fault and the Farm Road Strand. A detailed fault investigation was performed by Leighton for these projected faults. Although no active faulting was observed, some local discontinuous fracturing was observed and documented. Because of the potential for ground movements in this area, mitigation is required.

State law prohibits the construction and placement of habitable structures²⁰ over the trace of an active fault pursuant to the Alquist-Priolo Act. The A-P Earthquake Fault Zone is located on the eastern border of the project site. Trenching conducted by Leighton across the Claremont Segment of the San Jacinto Fault in the eastern area of the project site identified the location of a portion of the fault; however, the entire length of the fault through the project site was not trenched. Although no habitable structure can be located on an active fault per State law, fault rupture hazard represents a potential significant seismic hazard on site that would require mitigation.

Implementation of **Mitigation Measures 4.6.6.1A** through **4.6.6.1C** will ensure fault rupture hazards are reduced to a less than significant level. (FEIR, Volume 3 pgs. 4.6-17 to 4.6-20).

b. Ground Shaking

Potential Significant Impact: The EIR evaluated and concluded that the future development permitted by the project would locate development in an area susceptible to ground shaking.

²⁰ California Code of Regulations, Section 3601 states, "A structure for human occupancy is any structure used or intended for supporting or sheltering any use of occupancy, which is expected to have a human occupancy rate of more than 2,000 person-hours per year."

Findings: Implementation of the following mitigation measures will reduce the impact related to ground shaking to less than significant:

4.6.6.2A Prior to issuance of building permits for any portion of the project site, a site-specific, design level geotechnical investigation for each parcel shall be submitted to the City, which would comply with all applicable state and local code requirements, and includes an analysis of the expected ground motions at the site from known active faults using accepted methodologies. The report shall determine:

1. Structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults.
2. The final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements.

Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.

Facts in Support of the Findings: According to Section 4.6 of the FEIR, Volume 3, Southern California is a seismically active area and, therefore, will continue to be subject to ground shaking resulting from seismic activity on regional faults. Ground shaking from earthquakes associated with nearby and more distant faults is expected to occur during the lifetime of the project. The level of potential ground motion is considered moderate to high in the City of Moreno Valley and, therefore, in the project area.

In accordance with the City’s General Plan Safety Element (Objective 6.1),²¹ project development will require geological and geotechnical investigations by State-licensed professionals. The geotechnical investigations will provide design considerations and earthwork recommendations to ensure that ground shaking impacts are appropriately mitigated. In addition, California Code of Regulations (CCR), Title 24, also known as the California Building Standards Code, contains building design and construction requirements relating to fire and life safety, and structural safety. The CBC also includes standards designed to ensure that structures within California are built to withstand expected levels of seismic activity for each earthquake region throughout the State. Specifically, Part 2 of Title 24, including Chapters 4, 16-18, and Appendix J provide guidance regarding grading, soils, and construction techniques related to seismic protection. These codes are provided to protect public safety and ensure that all structures built in the State can withstand anticipated seismic ground shaking and other related geotechnical and soils constraints. Implementation of **Mitigation Measure 4.6.6.2A** will ensure ground shaking impacts caused by earthquakes are reduced to a less than significant level. (FEIR, Volume 3 pgs. 4.6-20 to 4.6-21).

c. Unstable Soils

Potential Significant Impact: The EIR evaluated and concluded that the future development permitted by the project would locate development in an area susceptible to unstable soils.

Findings: Implementation of the following mitigation measures will reduce the impact related to unstable soils to less than significant:

4.6.6.3A Each Plot Plan application for development shall include a site-specific, design level geotechnical investigation for each parcel, in compliance with all applicable state and local code requirements, and including an analysis of the expected soil hazards at the site. The report shall determine:

1. Structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults.
2. The final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements.

Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project

²¹ Moreno Valley General Plan, Chapter 9 Goals and Objectives, pg. 9-30.

structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. These investigations shall identify any site-specific impacts from compressible and expansive soils based on the actual location of individual pads proposed in the future, so that differential movement can be further verified or evaluated in view of the actual foundation plan and imposed fill or structural loads. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.

Compliance with this measure will ensure that future buildings are designed to protect the structure and occupants from on-site soil limitations, consistent with State Building Code requirements. This measure shall be implemented to the satisfaction of the City Engineer.

4.6.6.3B Any cut slopes in excess of five (5) feet in vertical height shall be constructed as “replacement fill slopes” per the project geotechnical report, due to the variable nature of the onsite alluvial soils. This measure shall be implemented to the satisfaction of the City Land Development Division and the City Engineer in consultation with the Project Geologist.

4.6.6.3C During all grading activities, a geotechnical engineer shall monitor site preparation, removal of unsuitable soils, mapping of all earthwork excavations, approval of imported earth materials, fill placement, foundation installation, and other geotechnical operations. Laboratory testing of subsurface materials to confirm compacted dry density and moisture content, consolidation potential, corrosion potential, expansion potential, and resistance value (R-value) shall be performed prior to and during grading as appropriate. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.

Facts in Support of the Findings: According to Section 4.6 of the FEIR, Volume 3, expansive soils generally have a substantial amount of clay particles, which can give up water (shrink) or absorb water (swell). The change in the volume exerts stress on buildings and other loads placed on these soils. The extent or range of the shrink/swell is influenced by the amount and kind of clay present in the soil. Expansive soils can be widely dispersed and they can occur in hillside areas as well as low-lying alluvial basins. On-site soils (Dv and Wb soils) are identified as having a moderate to low shrink-swell potential. Because the potential exists to locate development on moderately expansive soils, impacts are considered significant and mitigation is required. In accordance with the City's General Plan Safety Element (Implementation Measure I.E.1) and as indicated previously, development of the project will require geological and geotechnical investigations by State-licensed professionals. To ensure impacts from expansive soils are addressed for specific development sites, adherence to **Mitigation Measures 4.6.6.3A** through **4.6.6.3C** is required to reduce impacts from unstable soils to less than significant. (FEIR, Volume 3 pg. 4.6-21 to 4.6-23)

7. Greenhouse Gas Emissions, Climate Change, and Sustainability

a. Greenhouse Gas Emissions

Potential Significant Impact: The EIR evaluated and concluded that the Project could have an adverse effect due to the generation of greenhouse gas emissions (GHGs).

Findings: Implementation of the following mitigation measures will reduce the impact related to greenhouse gas emissions to less than significant:

4.7.6.1A The project shall implement the following requirements to reduce solid waste and greenhouse gas emissions from construction and operation of project development:

- a) Prior to January 1, 2020, divert a minimum of 50 percent of landfill waste generated by operation of the project. After January 1, 2020, development shall divert a minimum of 75 percent of landfill waste. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis.
- b) Prior to January 1, 2020, recycle and/or salvage at least 50 percent of non-hazardous construction and demolition debris. After January 1, 2020, recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris. In January of each calendar year after project approval the developer

and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis.

Develop and implement a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or co-mingled. Calculations can be done by weight or volume, but must be consistent throughout.

- c) The applicant shall submit a Recyclables Collection and Loading Area Plan for construction related materials prior to issuance of a building permit with the Building Division and for operational aspects of the project prior to the issuance of the occupancy permit to the Public Works Department. The plan shall conform to the Riverside County Waste Management Department's Design Guidelines for Recyclable Collection and Loading Areas.
- d) Prior to issuance of certificate of occupancy, the recyclables collection and loading area shall be constructed in compliance with the Recyclables Collection and Loading Area plan.
- e) Prior to issuance of certificate of occupancy, documentation shall be provided to the City confirming that recycling is available for each building.
- f) Within six months after occupancy of a building, the City shall confirm that all tenants have recycling procedures set in place to recycle all items that are recyclable, including but not limited to paper, cardboard, glass, plastics, and metals.
- g) The property owner shall advise all tenants of the availability of community recycling and composting services.
- h) Existing onsite street material shall be recycled for new project streets to the extent feasible.

4.16.4.6.1C Prior to the issuance of a building permit, new development shall demonstrate that each building has implemented the following:

- 1) Install solar panels with a capacity equal to the peak daily demand for the ancillary office uses in each warehouse building;

- 2) Increase efficiency for buildings by implementing either 10 percent over the 2008 Title 24's energy saving requirements or the Title 24 requirements in place at the time the building permit is approved, whichever is more strict; and
- 3) Require the equivalent of "Leadership in Energy and Environmental Design Certified" for the buildings constructed at the World Logistics Center based on Leadership in Energy and Environmental Design Certified standards in effect at the time of project approval.

This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions.

Facts in Support of the Findings: According to FEIR, Volume 3 Section 4.7, future development that could occur on the Project site could generate GHG emissions during construction and operation activities. Most of the project's GHG emissions (transportation and electricity) are covered under the AB 32 California cap-and-trade program and are therefore "capped" GHG emissions. For informational purposes, the capped construction GHG emissions averaged over 30 years are approximately 8,820 metric tons of carbon dioxide equivalents (mt CO₂e) before mitigation and 7,750 mt CO₂e after applying air quality mitigation. The capped operational GHG emissions are approximately 396,800 mt CO₂e per year without mitigation and 379,800 mt CO₂e per year after applying mitigation from other impact sections (i.e., air quality, water, energy).

Based on a comparison of the Project to the South Coast Air Quality Management District tiered interim GHG significance criteria, the most applicable South Coast Air Quality Management District threshold for the uncapped GHG emissions is the Industrial at 10,000 mt CO₂e per year. The long-term Project operational uncapped GHG emissions for the Project are 19,237 mt CO₂e per year and exceed this threshold; therefore, the Project operational GHG emissions are significant before mitigation. With implementation of **Mitigation Measure 4.7.5.1A**, the Project's uncapped GHG emissions would be reduced to approximately 6,000 mt CO₂e, which is less than significant. In order to ensure that the Project complies with and would not conflict with or impede the implementation of reduction goals identified in AB 32, the Governor's EO S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor, **Mitigation Measures 4.3.6.3B, 4.3.6.4A, 4.3.6.3C, 4.3.6.3D, 4.7.5.1A, 4.16.1.6.1A, 4.16.1.6.1B, 4.16.1.6.1C, 4.16.4.6.1A, 4.16.4.6.1B, and 4.16.4.6.1C** shall be implemented. (FEIR, Volume 3 pg. 4.7-34 to 4.7-59)

b. Greenhouse Gas Plan, Policy, Regulation Consistency

Potential Significant Impact: The EIR evaluated and concluded that the Project could be inconsistent with greenhouse gas plans, policies and regulations.

Findings: Implementation of **Mitigation Measures 4.3.6.3B, 4.3.6.3C, 4.3.6.3D, 4.3.6.4A, 4.7.6.1A, 4.16.1.6.1A, 4.16.1.6.1B, 4.16.1.6.1C, 4.16.4.6.1A, and 4.16.4.6.1B and 4.16.4.6.1C** will help reduce project-related GHG emissions and therefore make it more consistent with GHG reduction plans, policies, and/or regulations. Those mitigation measures are as follows:

4.3.6.3B The following shall be implemented as indicated:

Prior to Issuance of a Certificate of Occupancy

- a) Signs shall be prominently displayed informing truck drivers about the California Air Resources Board diesel idling regulations, and the prohibition of parking in residential areas.
- b) Signs shall be prominently displayed in all dock and delivery areas advising of the following: engines shall be turned off when not in use; trucks shall not idle for more than three consecutive minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report air quality violations.
- c) Signs shall be installed at each exit driveway providing directional information to the City's truck route. Text on the sign shall read "To Truck Route" with a directional arrow. Truck routes shall be clearly marked per the City Municipal Code.

On an Ongoing Basis

- d) Tenants shall maintain records on fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles are maintained pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.
- e) Tenant's staff in charge of keeping vehicle records shall be trained/certified in diesel technologies, by attending California Air Resources Board approved courses (such as the free, one-day Course #512). Documentation of said training shall be maintained on-site and be available for inspection by the City.
- f) Tenants shall be encouraged to become a SmartWay Partner.
- g) Tenants shall be encouraged to utilize SmartWay 1.0 or greater carriers.

- h) Tenants' fleets shall be in compliance with all current air quality regulations for on-road trucks including but not limited to California Air Resources Board's Heavy-Duty Greenhouse Gas Regulation and Truck and Bus Regulation.
- i) Information shall be posted in a prominent location available to truck drivers regarding alternative fueling technologies and the availability of such fuels in the immediate area of the World Logistics Center.
- j) Tenants shall be encouraged to apply for incentive funding (such as the Voucher Incentive Program [VIP], Carl Moyer, etc.) to upgrade their fleet.
- k) All yard trucks (yard dogs/yard goats/yard jockeys/yard hostlers) shall be powered by electricity, natural gas, propane, or an equivalent non-diesel fuel. Any off-road engines in the yard trucks shall have emissions standards equal to Tier 4 Interim or greater. Any on-road engines in the yard trucks shall have emissions standards that meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
- l) All diesel trucks entering logistics sites shall meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Facility operators shall maintain a log of all trucks entering the facility to document that the truck usage meets these emission standards. This log shall be available for inspection by City staff at any time.
- m) All standby emergency generators shall be fueled by natural gas, propane, or any non-diesel fuel.
- n) Truck and vehicle idling shall be limited to three (3) minutes.

4.3.6.3C

Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area, a publically-accessible fueling station shall be operational within the Specific Plan area offering alternative fuels (natural gas, electricity, etc.) for purchase by the motoring public. Any fueling station shall be placed a minimum of 1000 feet from any off-site sensitive receptors or off-site zoned sensitive uses. This facility may be established in connection with the convenience store required in Mitigation Measure 4.3.6.3D.

4.3.6.3D Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area a site shall be operational within the Specific Plan area offering food and convenience items for purchase by the motoring public. This facility may be established in connection with the fueling station required in Mitigation Measure 4.3.6.3C.

4.3.6.4A The following measures shall be incorporated as conditions to any Plot Plan approval within the Specific Plan:

- a) All tenants shall be required to participate in Riverside County’s Rideshare Program–
- b) Storage lockers shall be provided in each building for a minimum of three percent of the full-time equivalent employees based on a ratio of 0.50 employees per 1,000 square feet of building area. Lockers shall be located in proximity to required bicycle storage facilities.
- c) Class II bike lanes shall be incorporated into the design for all project streets.
- d) The project shall incorporate pedestrian pathways between on-site uses.
- e) Site design and building placement shall provide pedestrian connections between internal and external facilities.
- f) The project shall provide pedestrian connections to residential uses within 0.25 mile from the project site.
- g) A minimum of two electric vehicle-charging stations for automobiles or light-duty trucks shall be provided at each building. In addition, parking facilities with 100 parking spaces or more shall be designed and constructed so that at least three percent of the total parking spaces are capable of supporting future electric vehicle supply equipment (EVSE) charging locations. Only sufficient sizing of conduit and service capacity to install Level 2 Electric Vehicle Supply Equipment (EVSE) or greater are required to be installed at the time of construction.
- h) Each building shall provide indoor and/or outdoor - bicycle storage space consistent with the City Municipal Code and the California Green Building Standards Code.-

Each building shall provide a minimum of two shower and changing facilities for employees.

- i) Each building shall provide preferred and designated parking for any combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles equivalent to the number identified in California Green Building Standards Code Section 5.106.5.2 or the Moreno Valley Municipal Code whichever requires the higher number of carpool/vanpool stalls.
- j) The following information shall be provided to tenants: onsite electric vehicle charging locations and instructions, bicycle parking, shower facilities, transit availability and the schedules, telecommunicating benefits, alternative work schedule benefits, and energy efficiency.

4.7.6.1A

The project shall implement the following requirements to reduce solid waste and greenhouse gas emissions from construction and operation of project development:

- a) Prior to January 1, 2020, divert a minimum of 50 percent of landfill waste generated by operation of the project. After January 1, 2020, development shall divert a minimum of 75 percent of landfill waste. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis.
- b) Prior to January 1, 2020, recycle and/or salvage at least 50 percent of non-hazardous construction and demolition debris. After January 1, 2020, recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis.

Develop and implement a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or co-mingled. Calculations can be done by weight or volume, but must be consistent throughout.

- c) The applicant shall submit a Recyclables Collection and Loading Area Plan for construction related materials prior to issuance of a building permit with the

Building Division and for operational aspects of the project prior to the issuance of the occupancy permit to the Public Works Department. The plan shall conform to the Riverside County Waste Management Department's Design Guidelines for Recyclable Collection and Loading Areas.

- d) Prior to issuance of certificate of occupancy, the recyclables collection and loading area shall be constructed in compliance with the Recyclables Collection and Loading Area plan.
- e) Prior to issuance of certificate of occupancy, documentation shall be provided to the City confirming that recycling is available for each building.
- f) Within six months after occupancy of a building, the City shall confirm that all tenants have recycling procedures set in place to recycle all items that are recyclable, including but not limited to paper, cardboard, glass, plastics, and metals.
- g) The property owner shall advise all tenants of the availability of community recycling and composting services.
- h) Existing onsite street material shall be recycled for new project streets to the extent feasible.

4.16.1.6.1A Prior to approval of a precise grading permit for each plot plan for development within the World Logistics Center Specific Plan (WLCSP), the developer shall submit landscape plans that demonstrate compliance with the World Logistics Center Specific Plan, the State of California Model Water Efficient Landscape Ordinance (AB 1881), and Conservation in Landscaping Act (AB 325). This measure shall be implemented to the satisfaction of the Planning Division. Said landscape plans shall incorporate the following:

- Use of xeriscape, drought-tolerant, and water-conserving landscape plant materials wherever feasible and as outlined in Section 6.0 of the World Logistics Center Specific Plan;
- Use of vacuums, sweepers, and other “dry” cleaning equipment to reduce the use of water for wash down of exterior areas;

- Weather-based automatic irrigation controllers for outdoor irrigation (i.e., use moisture sensors);
- Use of irrigation systems primarily at night or early morning, when evaporation rates are lowest;
- Use of recirculation systems in any outdoor water features, fountains, etc.;
- Use of low-flow sprinkler heads in irrigation system;
- Provide information to the public in conspicuous places regarding outdoor water conservation; and
- Use of reclaimed water for irrigation if it becomes available.

4.16.1.6.1B All buildings shall include water-efficient design features outlined in Section 4.0 of the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development Division/Public Works. These design features shall include, but not limited to the following:

- Instantaneous (flash) or solar water heaters;
- Automatic on and off water faucets;
- Water-efficient appliances;
- Low-flow fittings, fixtures and equipment;
- Use of high efficiency toilets (1.28 gallons per flush [gpf] or less);
- Use of waterless or very low water use urinals (0.0 gpf to 0.25 gpf);
- Use of self-closing valves for drinking fountains;
- Infrared sensors on drinking fountains, sinks, toilets and urinals;
- Low-flow showerheads;

- Water-efficient ice machines, dishwashers, clothes washers, and other water-using appliances;
- Cooling tower recirculating system where applicable;
- Provide information to the public in conspicuous places regarding indoor water conservation; and
- Use of reclaimed water for wash down if it becomes available.

4.16.4.6.1C Prior to the issuance of a building permit, new development shall demonstrate that each building has implemented the following:

- 1) Install solar panels with a capacity equal to the peak daily demand for the ancillary office uses in each warehouse building;
- 2) Increase efficiency for buildings by implementing either 10 percent over the 2008 Title 24's energy saving requirements or the Title 24 requirements in place at the time the building permit is approved, whichever is more strict; and
- 3) Require the equivalent of "Leadership in Energy and Environmental Design Certified" for the buildings constructed at the World Logistics Center based on Leadership in Energy and Environmental Design Certified standards in effect at the time of project approval.

This measure shall be implemented to the satisfaction of the Land Development Division/Public Works.

4.16.4.6.1A Each application for a building permit shall include energy calculations to demonstrate compliance with the California Energy Efficiency Standards confirming that each new structure meets applicable Building and Energy Efficiency Standards. The plans shall also ensure that buildings are in conformance with the State Energy Conservation Efficiency Standards for Nonresidential buildings (Title 24, Part 6, Article 2, California Administrative Code). This measure shall be implemented to the satisfaction of the Land Development Division/Public Works. Plans shall show the following:

- Energy-efficient roofing systems, such as “cool” roofs, that reduce roof temperatures significantly during the summer and therefore reduce the energy requirement for air conditioning.
- Cool pavement materials such as lighter-colored pavement materials, porous materials, or permeable or porous pavement, for all roadways and walkways not within the public right-of-way, to minimize the absorption of solar heat and subsequent transfer of heat to its surrounding environment.
- Energy-efficient appliances that achieve the 2008 Appliance Energy Efficiency Standards (e.g., EnergyStar Appliances) and use of sunlight-filtering window coatings or double-paned windows.

4.16.4.6.1B Prior to the issuance of any building permits within the World Logistics Center Specific Plan, each project developer shall submit energy calculations used to demonstrate compliance with the performance approach to the California Energy Efficiency Standards to the Building Department Land Development Division/Public Works that shows each new structure meets the applicable Building and Energy Efficiency Standards. Plans may include but are not necessarily limited to implementing the following as appropriate:

- High-efficiency air-conditioning with electronic management system (computer) control.
- Variable Air Volume air distribution.
- Outside air (100 percent) economizer cycle.
- Staged compressors or variable speed drives to flow varying thermal loads.
- Isolated High-efficiency air-conditioning zone control by floors/separable activity areas.
- Specification of premium-efficiency electric motors (i.e., compressor motors, air handling units, and fan-coil units).
- Use of occupancy sensors in appropriate spaces.
- Use of compact fluorescent lamps in place of incandescent lamps.

- Use of cold cathode fluorescent lamps.
- Use of Energy Star exit lighting or exit signage.
- Use of T-8 lamps and electronic ballasts where applications of standard fluorescent fixtures are identified.
- Use of lighting power controllers in association with metal-halide or high-pressure sodium (high intensity discharge) lamps for outdoor lighting and parking lots.
- Use of skylights (may conflict with installation of solar panels in some instances).
- Consideration of thermal energy storage air conditioning for spaces or hotel buildings, meeting facilities, theaters, or other intermittent-use spaces or facilities that may require air-conditioning during summer, day-peak periods.

4.16.4.6.1C Prior to the issuance of a building permit, new development shall demonstrate that each building has implemented the following:

- 1) Install solar panels with a capacity equal to the peak daily demand for the ancillary office uses in each warehouse building;
- 2) Increase efficiency for buildings by implementing either 10 percent over the 2008 Title 24's energy saving requirements or the Title 24 requirements in place at the time the building permit is approved, whichever is more strict; and
- 3) Require the equivalent of "Leadership in Energy and Environmental Design Certified" for the buildings constructed at the World Logistics Center based on Leadership in Energy and Environmental Design Certified standards in effect at the time of project approval.

This measure shall be implemented to the satisfaction of the Land Development Division/Public Works.

Facts in Support of the Findings: According to FEIR, Volume 3 Section 4.7, implementation of the Project could result in the development of an approximately 40.6 million square foot high cube-logistics

distribution logistics. The Project includes a variety of physical attributes and operational programs that would help reduce operational-source pollutant emissions from worker commuting, including GHG emissions. Future development that would occur under the Project would be consistent with greenhouse gas emission reduction strategies and policies, including the City's Climate Change Strategy. The Project would implement the Mitigation Measures listed above to reduce its contribution to GHG emissions and to ensure it does not conflict with or impede implementation of reduction goals identified in AB 32, Governor's Executive Order S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor. In addition, the Project would also be subject to all applicable regulatory requirements, which would also reduce the GHG emissions of the project. Therefore, the Project would not conflict with any applicable plan, program, policy, or regulation related to the reduction of GHG emissions. Impacts are considered less than significant.

Similar to the discussion of cumulative air quality impacts, the Project may employ workers locally from the City. This has the benefit of improving the local jobs/housing balance leading to air quality benefits in terms of shorter trip lengths, which lead to lower emissions than if the workforce was derived from distant locations.

The analysis in the EIR concluded that the Project's contributions to climate change are less than significant. Given (i) the global nature of climate change; (ii) uncertainty regarding the extent to which anthropogenic sources are the true causes of any increase in the earth's temperatures; and (iii) the lack of emissions controls being imposed by the world's most rapidly developing nations, even if there is a causal relationship between anthropogenic emissions and an increase in the world's temperature, it is difficult to argue that an individual Project's cumulative contribution to climate change is foreseeable and cumulatively considerable. Nonetheless, the State of California has adopted a number of policies, including AB32, Governor's Executive Order S-3-05, and Pavley I, that provide the structure and commitment to address California's contribution to global climate change. Since the proposed project is consistent with these policies, including being below the SCAQMD threshold for greenhouse gases that was structured in accordance with these State policies, the project is consistent with greenhouse gas plans, policies and regulations. (FEIR, Volume 3, pgs. 4.7-52 through 4.7-59)

8. Hazards and Hazardous Materials

a. On-site Conditions Involving Hazardous Materials

Potential Significant Impact: The EIR evaluated and concluded that the Project could through the demolition of the existing on-site rural residential structures may involve hazardous materials (ACM and

LBP) and possibly soil contamination from past agricultural chemical use and may involve hazardous materials (LNG/CNG).

Findings: Implementation of the following mitigation measures will reduce the impact of the Project related hazardous materials to less than significant:

- 4.8.6.1A** Prior to demolition of any existing structures on the project site, a qualified contractor shall be retained to determine if asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. If asbestos-containing materials and/or lead-based paint are present, prior to commencement of demolition, these materials shall be removed and transported to an appropriate landfill by a licensed contractor. In addition, onsite soils shall be tested for contamination by agricultural chemicals. If present, these materials shall be removed and transported to an appropriate landfill by a licensed contractor. This measure shall be implemented to the satisfaction of the Building Division including written documentation of the disposal of any asbestos-containing materials, lead-based paint, or agricultural chemical residue in conformance with all applicable regulations.
- 4.8.6.1B** Prior to the issuance of any discretionary permits associated with the proposed fueling facility (“logistic support” site in the LD zone), a risk assessment or safety study that identifies the potential public health and safety risks from accidents at the facility (e.g., fire, tank rupture, boiling liquid, or expanding vapor explosion) shall be submitted to the City for review and approval. This study shall be prepared to industry standards and demonstrate that the facility will not create any significant public health or safety impacts or risks, to the satisfaction of the City Building and Safety Division and the Fire Prevention Bureau.
- 4.8.6.1C** Prior to grading for any discretionary permits for development in Planning Areas 9-12 adjacent to the natural gas compressor plant, the applicant shall prepare a risk assessment report analyzing safety conditions relative to the existing compressor plant and planned development. The report must be based on appropriate industry standards and identify the potential hazards from the compressor plant (e.g., fire, explosion) and determine that the distance from the plant to the closest planned buildings in Planning Areas 9-12 is sufficient to protect the safety of workers from accidents that could occur (see Final EIR Volume 3 Figure 4.1.6B) at the compressor plant. This measure shall be implemented to the satisfaction of the City Building and Safety Division and the Fire Prevention Bureau.

4.8.6.1D Prior to the issuance of any grading permit, the developer shall inform the City of any existing solid waste materials within the development area. In conjunction with grading activities, all solid waste matter within the development area shall be removed by a licensed contractor and disposed of in an approved landfill. A record of the removal and disposal of any waste materials, in compliance with applicable laws and regulations, shall be submitted to the City prior to the issuance of any building permits

Facts in Support of the Findings: According to Section 4.8 of the FEIR, Volume 3, due to the suspected age of the rural residential structures on the site, it is possible that demolition of these structures may involve asbestos-containing materials (ACMs) and/or lead-based paint (LBP). Demolition of these structures may need to be supervised or conducted by contractors certified to remove and dispose of ACMs and/or LBP.

Also because the site was previously farmed the on-site soils may contain pesticide. Prior to grading, soil testing shall performed to determine if in fact these areas contain any significant levels of agricultural chemicals in the soil, and, if so, they will be remediated by a licensed contractor.

In addition, the Specific Plan proposes a liquefied natural gas/compressed natural gas (LNG/CNG) fueling station to be constructed on approximately 3,000 square feet somewhere in the eastern portion of the Logistics Development (LD) land use area of the Specific Plan. This LNG/CNG facility is referred to as “logistics support” in the Specific Plan land uses. It would provide natural gas to fuel heavy and light-duty trucks serving the project. Since this facility would store natural gas under liquefied and compressed conditions, there is a potential for fire and/or explosion involving natural gas.

Implementation of **Mitigation Measures 4.8.6.1A** through **4.8.6.1D**, impacts associated with potential hazardous materials in existing rural residential structures or from the proposed natural gas fueling facility will be reduced to less than significant levels. (FEIR, Volume 3 pg. 4.8-22 to 4.8-23).

9. Hydrology, Drainage, and Water Quality

a. Drainage Pattern and Capacity-Related Impacts

Potential Significant Impact: The EIR evaluated and concluded that the Project may significantly increase off-site runoff.

Findings: Implementation of the following mitigation measures will reduce the Project’s increase in off-site runoff to less than significant:

4.9.6.1A Prior to issuance of any building permit within the Specific Plan area, the developer shall construct storm drain pipes and conveyances, as well as, combined detention and infiltration basin(s), bioretention area(s), and spreading area(s) within each proposed watershed, as outlined in the project hydrology plan, to mitigate the impacts of increased peak flow rate, velocity, flow volume and reduce the time of concentration by storing and infiltrating increased runoff for a limited period of time and release the outflow at a rate that does not exceed the pre-development peak flows and velocities for the 2, 5, 10, 25, and 100-year storms and volumes as assessed in the water balance model for historical conditions. For the purpose of this mitigation measure, the term “construct” shall mean to substantially complete construction so as to function for its intended purpose during construction with complete construction prior to occupancy. Field investigations will be conducted to determine the infiltration rate of soils underlying the proposed locations of bioretention areas and detention basins. The infiltration rate of the underlying soils will be used to properly size the bioretention areas and detention basins/infiltration basins to ensure that adequate volumes of runoff, in cumulative total for all bioretention areas and detention areas are captured and infiltrated. The water balance model will be updated and rerun for the site-specific conditions encountered to confirm the water balance. This measure shall be implemented to the satisfaction of the City Engineer. Energy dissipaters shall be used as the spillways of basins to reduce the runoff velocity and dissipate the flow energy. Drainage weir structures shall be constructed at the downstream end of the watersheds flowing to the San Jacinto Wildlife Area to control the runoff and spread the flow such that the flows exiting the project boundary will return to the sheet flow pattern similar to the existing condition. Detention basins and spreading areas shall be designed to account for the amount of the sediment transported through the project boundary so that the existing sediment carrying capacity is maintained.

4.9.6.1B The bioretention areas and detention/infiltration basins shall be designed to assure infiltrations rates. The monitoring plan will follow the guidelines presented by the California Storm Water Quality Association (CASQA) in the California Storm Water Best Management Program (BMP) Handbook, Municipal, January 2003 Section 4, Treatment Control Best Management Programs Fact Sheets TC-11 Infiltration Basin and TC-30 Vegetated Swale).

For the bioretention areas, as needed maintenance activities shall be conducted to remove accumulated sediment that may obstruct flow through the swale. Bioretention areas shall

be monitored at the beginning and end of each wet season to assess any degradation in infiltration rates. The maintenance activities should occur when sediment on channels and culverts builds up to more than 3 inches (CASQA 2003). The swales will need to be cultivated or rototilled if drawdown takes more than 72 hours.

For the Detention/infiltration Basins, a 3-5 year maintenance program shall be implemented mainly to keep infiltration rates close to original values since sediment accumulation could reduce original infiltration rate by 25-50%. Infiltration rates in detention basins will be monitored at the beginning and end of each wet season to assess any degradation in infiltration rates. If cumulative infiltration rates of all detention basins drops below the minimum required rates, then the detention basins will be reconditioned to improve infiltration capacity by scraping the bottom of the detention basin, seed or sod to restore groundcover, aerate bottom and dethatch basin bottom (CASQA 2003).

Facts in Support of the Findings: According to Section 4.9 of the FEIR, Volume 3, Due to the construction of impervious surfaces on the project site, post-development flows will be higher than the pre-development flows. To avoid a significant impact to the existing drainage capacity, the post-development flows, volumes, and velocities coming from the Project site must be managed to be equal to or less than pre-development flows volumes, and velocities.²² As required by **Mitigation Measure 4.9.6.1A**, flows will be reduced to below or equal to pre-development conditions by routing the on-site storm water flows through a series of on-site detention and infiltration basins before flows are released off site. The existing storm water runoff discharge rate for the undeveloped project site is 7,720 cubic feet per second (cfs). With the installation of the on-site detention basins, culverts, and energy dissipaters included in the project, expected discharges would be at a rate of 6,835 cfs, which is less than the existing condition. With the installation of the storm drain system facilities outlined in CH2M Hill's hydrology reports (Appendix J, FEIR Volume 3) and implementation of the **Mitigation Measure 4.9.6.1A**, the buildout of the project will convey storm flows safely through the region in accordance with Riverside County Flood Control requirements and will not result in flooding or additional erosion within the project area or any downstream areas, including the Perris Valley Storm Drain Channel. (FEIR, Volume 3, pg. 4.9-49)

Development of the WLC Project site will increase impervious surfaces on the Project site due to the construction of the Project's buildings, roadways, and associated improvements. While the resultant

²² As part of the MS4 Permit issuance requirements, projects must identify any Hydrologic Conditions of Concern and demonstrate that changes to hydrology are minimized to ensure that post-development runoff rates and velocities from a site do not adversely impact downstream erosion, sedimentation or stream habitat.

increase in impervious surfaces would contribute to a greater volume and higher velocities of storm flow, **Mitigation Measure 4.9.6.1A** require the WLC Project site's drainage system be designed to accept and accommodate runoff that would result from the project construction at or better than historic, or pre-development, conditions, as outlined in the Project's Master Plan of Drainage. **Mitigation Measure 4.9.6.1B** provides for the operation and maintenance of these facilities to ensure that they will be maintained. (FEIR, Volume 3, pg. 4.9-32 to 4.9-51)

b. Construction-Related Water Quality Impacts

Potential Significant Impact: The EIR evaluated and concluded that the Project could violate water quality standards or waste discharge requirements during construction phases of the Project in form of increased soil erosion, sedimentation, or storm water discharges.

Findings: Implementation of the following mitigation measures will reduce the impact to construction-related water quality to less than significant:

4.9.6.2A Prior to issuance of any grading permit for development in the World Logistics Center Specific Plan, the project developer shall file a Notice of Intent (NOI) with the Santa Ana Regional Water Quality Control Board to be covered under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of storm water associated with construction activities. The project developer shall submit to the City the Waste Discharge Identification Number issued by the State Water Quality Control Board (SWQCB) as proof that the project's Notice of Intent is to be covered by the General Construction Permit has been filed with the State Water Quality Control Board. This measure shall be implemented to the satisfaction of the City Engineer.

4.9.6.2B Prior to issuance of any grading permit for development in the World Logistics Center Specific Plan, the project developer shall submit to the State Water Quality Control Board (SWQCB) a project-specific Storm Water Pollution Prevention Plan (SWPPP). The Storm Water Pollution Prevention Plan shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the Storm Water Pollution Prevention Plan shall emphasize structural and nonstructural best management practices (BMPs) to control sediment and non-visible discharges from the site. Best Management Practices to be implemented may include (but shall not be limited to) the following:

- Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the Best Management Practices are to be periodically inspected by the Regional Water Quality Control Board during construction, and repairs would be made as required.
- Materials that have the potential to contribute non-visible pollutants to storm water must not be placed in drainage ways and must be placed in temporary storage containment areas.
- All loose soil, silt, clay, sand, debris, and other earthen material shall be controlled to eliminate discharge from the site. Temporary soil stabilization measures to be considered include: covering disturbed areas with mulch, temporary seeding, soil stabilizing binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Stockpiles shall be surrounded by silt fences and covered with plastic tarps.
- The Storm Water Pollution Prevention Plan shall include inspection forms for routine monitoring of the site during the construction phase.
- Additional required Best Management Practices and erosion control measures shall be documented in the Storm Water Pollution Prevention Plan.
- The Storm Water Pollution Prevention Plan would be kept on site for the duration of project construction and shall be available to the local Regional Water Quality Control Board for inspection at any time.

The developer and/or construction contractor for each development area shall be responsible for performing and documenting the application of Best Management Practices identified in the project-specific Storm Water Pollution Prevention Plan. Regular inspections shall be performed on sediment control measures called for in the Storm Water Pollution Prevention Plan. Monthly reports shall be maintained and available for City inspection. An inspection log shall be maintained for the project and shall be available at the site for review by the City of Moreno Valley and the Regional Water Quality Control Board.

Facts in Support of the Findings: According to Section 4.9 of the FEIR, Volume 3, the construction and grading phases of the Project site would require the disturbance of surface soils and removal of existing orange groves and vegetative cover. During the construction period, grading and excavation activities would result in exposure of soil to storm runoff, potentially causing erosion and sediment in runoff. If not

managed through Best Management Practices (BMPs), the runoff could cause erosion and increased sedimentation in local drainage ways such as the Quincy Channel. The potential for chemical releases is present at most construction sites in the form of fuels, solvents, glues, paints, and other building construction materials. However, implementation of construction practices and adherence to existing water quality regulations and **Mitigation Measures 4.9.6.2A** and **4.9.6.2B** would reduce these impacts to a less than significant level. (FEIR, Volume 3 pgs. 4.9-52 to 4.9-54)

c. Operational-Related Water Quality Impacts

Potential Significant Impact: The EIR evaluated and concluded that the Project could violate water quality standards or waste discharge requirements during the operational phases of the Project in the form of increased soil erosion, sedimentation, or urban runoff.

Findings: Implementation of the following mitigation measure will reduce the impact to operational-related water quality to less than significant:

4.9.6.3A Prior to discretionary permit approval for individual plot plans, a site-specific Water Quality Management Plan (WQMP) shall be submitted to the City Land Development Division for review and approval. The Water Quality Management Plan shall specifically identify site design, source control, and treatment control Best Management Practices that shall be used on site to control pollutant runoff and to reduce impacts to water quality to the maximum extent practicable. The Water Quality Management Plan shall be consistent with the Water Quality Management Plan approved for the overall World Logistics Center Specific Plan project. At a minimum, the site developer shall implement the following site design, source control, and treatment control Best Management Practices as appropriate:

Site Design Best Management Practices

- (a) Minimize urban runoff.
- (b) Maximize the permeable area.
- (c) Incorporate landscaped buffer areas between sidewalks and streets.
- (d) Maximize canopy interception and water conservation by planting native or drought-tolerant trees and large shrubs.
- (e) Use natural drainage systems.
- (f) Where soil conditions are suitable, use perforated pipe or gravel filtration pits for low flow infiltration.

- (g) Construct on-site ponding areas or retention facilities to increase opportunities for infiltration consistent with vector control objectives.
- (h) Minimize impervious footprint.
- (i) Construct streets, sidewalks and parking lot aisles to the minimum widths necessary, provided that public safety and a walkable environment for pedestrians are not compromised.
- (j) Reduce widths of street where off-street parking is available.
- (k) Minimize the use of impervious surfaces such as decorative concrete, in the landscape design.
- (l) Conserve natural areas.
- (m) Minimize Directly Connected Impervious Areas (DCIAs).
- (n) Runoff from impervious areas will sheet flow or be directed to treatment control Best Management Practices.
- (o) Streets, sidewalks, and parking lots will sheet flow to landscaping/bioretenion areas that are planted with native or drought tolerant trees and large shrubs.

Source Control Best Management Practices

Source control Best Management Practices are implemented to eliminate the presence of pollutants through prevention. Such measures can be both non-structural and structural.

Non-structural source control Best Management Practices include:

- (a) Education for property owners, operator, tenants, occupants, or employees;
- (b) Activity restrictions;
- (c) Irrigation system and landscape maintenance;
- (d) Common area litter control;
- (e) Street sweeping private streets and parking lots; and
- (f) Drainage facility inspection and maintenance.

Structural source control Best Management Practices include:

- (g) MS4 stenciling and signage;
- (h) Landscape and irrigation system design;
- (i) Protect slopes and channels; and

- (j) Properly design fueling areas, trash storage areas, loading docks, and outdoor material storage areas.

Treatment Control Best Management Practices

Treatment control Best Management Practices supplement the pollution prevention and source control measures by treating the water to remove pollutants before it is released from the project site. The treatment control Best Management Practice strategy for the project is to select Low Impact Development (LID) Best Management Practices that promote infiltration and evapotranspiration, including the construction of infiltration basins, bioretention facilities, and extended detention basins. Where infiltration Best Management Practices are not appropriate, bioretention and/or biotreatment Best Management Practices (including extended detention basins, bioswales, and constructed wetlands) that provide opportunity for evapotranspiration and incidental infiltration may be utilized. Harvest and Reuse Best Management Practice will be used to store runoff for later non-potable uses.

Site-specific Water Quality Management Plans have not been prepared at this time as no site-specific development project has been submitted to the City for approval. When specific projects within the project are developed, Best Management Practices will be implemented consistent with the goals contained in the Master Water Quality Management Plan. All development within the project will be required to incorporate on-site water quality features to meet or exceed the approved Master Water Quality Management Plan's water quality requirements identified previously.

- 4.9.6.3B** The Property Owners Association (POA) and all property owners shall be responsible to maintain all onsite water quality basins according to requirements in the guidance Water Quality Management Plan and/or subsequent site-specific Water Quality Management Plans, and established guidelines of the Regional Water Quality Control Board. Failure to properly maintain such basins shall be grounds for suspension or revocation of discretionary operating permits, and/or referral to the Regional Water Quality Control Board for review and possible action. This measure shall be implemented to the satisfaction of the City Land Development Division, in consultation with the City Engineer, and Regional Water Quality Control Board.
- 4.9.6.3C** Prior to issuance of future discretionary permits for any development along the southern boundary of the World Logistics Center Specific Plan (WLCSP), the project developer of

such sites, in cooperation with the Property Owners Association (POA), shall establish and annually fund a Water Quality Mitigation Monitoring Plan (WQMMP) to confirm that project runoff will not have deleterious effects on the adjacent San Jacinto Wildlife Area (SJWA). This program shall include at least quarterly sampling along the southern boundary of the site (i.e., at the identified outlet structures of the project detention basins) during wet season flows and/or when water is present, as well as sampling of any dry-season flows that are observed entering the San Jacinto Wildlife Area property from the project property, including Drainage 9, which is planned to convey only clean off-site flows from north of the World Logistics Center Specific Plan site across Gilman Springs Road. The program shall also include at least twice yearly sampling after completion of construction, and a pre-construction survey must be completed to determine general water quality baseline conditions prior to and during development of the southern portion of the World Logistics Center Specific Plan. This sampling shall be consistent with and/or comply with the requirements of applicable Storm Water Pollution Prevention Plans (SWPPPs) for the development site.

The project developer of sites along the southern border of the World Logistics Center Specific Plan shall be responsible for preventing or eliminating any toxic pollutant (not including sediment) found to exceed applicable established public health standards. In addition, the discharge from the project shall not cause or contribute to an exceedance of Receiving Water Quality Objectives for the potential pollutants associated with the project as identified in Table 4.9.J. Once development is complete, the developer shall retain qualified personnel to conduct regular (i.e., at least quarterly) water sampling/testing of any basins and their outfalls to ensure the San Jacinto Wildlife Area will not be affected by water pollution from the project site. This measure shall be implemented to the satisfaction of the City Land Development Division Manager based on consultation with the project developer, Eastern Municipal Water District, the Regional Water Quality Control Board-Santa Ana Region, and the Mystic Lake Manager.

Facts in Support of the Findings: According to Section 4.9 of the FEIR, Volume 3, during the operational phase of any urban use, the major source of pollution in storm water runoff will be contaminants that have accumulated on the land surface over which runoff passes. Storm runoff from the roadways, parking lots, and commercial and industrial buildings can carry a variety of pollutants such as sediment, petroleum products, commonly utilized construction materials, landscaping chemicals, and (to a lesser extent) trace metals such as zinc, copper, lead, cadmium, and iron, which may lead to the

degradation of storm water in downstream channels. Runoff from landscaped areas may contain elevated levels of phosphorus, nitrogen, and suspended solids. Oil and other hydrocarbons from vehicles are also expected in storm water runoff.

Pollutant concentrations in urban runoff are variable depending on storm intensity, land use, elapsed time since previous storms, and the volume of runoff generated in a given area that reaches receiving waters. Pollutant concentrations are typically highest during the first major rainfall event after the dry season, known as the “first-flush.” The Water Quality Management Plan (WQMP) prepared for the project identifies pollutants and hydrologic conditions of concern that may be associated with the implementation of the project.

Site-specific WQMPs have not been prepared at this time as no site-specific development project has been submitted to the City for approval. When specific projects within the project are developed, BMPs will be implemented consistent with the goals contained in the master WQMP. All development within the project will be required to incorporate on-site water quality features to meet or exceed the approved Master WQMP’s water quality requirements identified previously. This would include the design based on the appropriate pollutant loads for the project from all sources including climate change.

The project will comply with the *Water Quality Management Plan for the Santa Ana Region of Riverside County* (approved by the Santa Ana Regional Water Quality Control Board October 22, 2012), which requires the use of Low Impact Development (LID) BMPs that maximize infiltration, harvest and use, evapotranspiration and/or bio-treatment. Flows from the project will be treated first by LID BMPs where the flow will be infiltrated, evapotranspired, or treated. As required by **Mitigation Measure 4.9.6.1A**, the treated flows will then be reduced to below or equal to pre-development conditions by routing the on-site storm water flows through a series of on-site detention and infiltration basins before flows are released off site. These basins will provide incidental infiltration and secondary treatment downstream of the LID BMPs. All runoff from the site will be treated by LID BMPs and then routed through the detention and infiltration basins before it leaves the project area and into Mystic Lake and the San Jacinto Wildlife Area.

The project will comply with the Nutrient Total Maximum Daily Load (TMDL) for Lake Elsinore and Canyon Lake by implementing LID-based BMPs. According to the *Comprehensive Nutrient Reduction Plan for Lake Elsinore and Canyon Lake* (prepared for Riverside County Flood Control and Water Conservation District by CDM Smith, January 28, 2013 in compliance with Order No. R8-2010-0033, NPDES Permit No. CAS618033), “Post construction LID based BMPs required for new development and

significant redevelopment projects are the only structural watershed based BMPs currently included in the Comprehensive Nutrient Reduction Plan (CNRP). The newly developed WQMP requirements ensure that a portion of the wet weather runoff will be contained onsite for all future development projects subject to WQMP requirements. Implementation of WQMP requirements over time coupled with the in lake remediation projects are expected to provide sufficient mitigation of nutrients.”

The proposed Project incorporates on-site drainage control structures and programs sufficient to meet the applicable Federal, State, and local water quality requirements. Through the use of site design BMPs, source control BMPs (e.g., street and parking lot sweeping and vacuuming), and treatment control BMPs (e.g., infiltration basins and pervious pavement), the resulting pollutant loads coming from the Project will be reduced, thereby reducing pollutants discharged from urban storm water runoff to surface water bodies. Compliance with the requirements of the NPDES permit, which include implementation of the BMPs outlined in the WQMP, will be enforced by the City during the ongoing operation of the Project. Implementation of **Mitigation Measures 4.9.6.3A** through **4.9.6.3C** will help to reduce potential water quality impacts resulting from storm water and urban runoff to less than significant levels. (FEIR, Volume 3 pgs. 4.9-55 to 4.9-64)

10. Noise

a. Short-Term Construction Noise

Potential Significant Impact: The EIR evaluated and concluded that noise levels from grading and other construction activities for the Project may range up to 91 dBA at the closest residences southeast of the Project site for very limited times when construction occurs near the Project's boundary. Construction-related noise impacts from the Project would be potentially significant.

Finding: Implementation of the following mitigation measures will reduce potential short-term construction noise impacts to less than significant:

4.12.6.1A Prior to issuance of any discretionary project approvals, a Noise Reduction Compliance Plan (NRCP) shall be submitted to and approved by the City. The Noise Reduction Compliance Plan shall show the limits of nighttime construction in relation to any then-occupied residential dwellings and shall be in conformance with City standards. Conditions shall be added to any discretionary projects requiring that the limits of nighttime grading be shown on the Noise Reduction Compliance Plan and all grading plans submitted to the City (per Noise Study MM N-2, pg. 51).

- 4.12.6.1B** All construction equipment, fixed or mobile, shall be equipped with operating and maintained mufflers consistent with manufacturers' standards.
- 4.12.6.1C** Construction vehicles shall be prohibited from using Redlands Boulevard south of Eucalyptus Avenue to access on-site construction for all phases of development of the Specific Plan (per Noise Study MM N-1, pg. 51).
- 4.12.6.1D** No grading shall occur within 2,800 feet of residences south of State Route-60 between 8 p.m. and 6 a.m. on weekdays and between 8 p.m. and 7 a.m. on weekends. These restrictions shall be included as part of the Noise Reduction Compliance Plan per Mitigation Measure 4.12.6.1A (per Noise Study MM N-2, pg. 51).
- 4.12.6.1E** As an alternative to Mitigation Measure 4.12.6.1D, a 12-foot tall temporary construction sound barrier may be installed for residences within 1,580 feet of active nighttime construction areas. The temporary sound barrier shall be constructed of plywood with a total thickness of 15 inches, or a sound blanket wall may be used. If sound blankets are used, they must have a Sound Transmission Class (STC) rating of 27 or greater. This shall be included as part of the Noise Reduction Compliance Plan required in Mitigation Measure 4.12.6.1A, which shall be reviewed and approved by the City prior to implementation (per Noise Study MM N-2 and N-3, pg. 51 and pg. 52)
- 4.12.6.1F** As an alternative to Mitigation Measures 4.12.6.1D and 4.12.6.1E, on-site noise measurements of construction areas may be taken by qualified personnel and specific buffer distances between construction activities and existing residences may be proposed based on actual noise levels. These measurements will be incorporated into the Noise Reduction Compliance Plan required in Mitigation Measure 4.12.6.1A, which shall be reviewed and approved by the City prior to implementation (per Noise Study MM N-2, pg. 51).
- 4.12.6.1G** Any discretionary approvals for development that proposes grading within 1,580 feet of occupied residential units shall require that all grading equipment be equipped with residential grade mufflers (or better). All stationary construction equipment shall be placed so that emitted noise is directed away from noise-sensitive receptors nearest the site. Additionally, stationary construction equipment shall have all standard acoustic covers in place during operation (per Noise Study MM N-4, pg. 52).

- 4.12.6.1H** All material stockpiles in connection with any grading operations shall be located at least 1,200 feet from existing residences (per Noise Study MM N-5, pg. 52).
- 4.12.6.1I** All project-related off-site construction shall be limited to 6 a.m. and 8 p.m. on weekdays only. Construction during weekends and City holidays shall not be permitted (per Noise Study MM N-6, pg. 53) to the satisfaction of the Land Development Division/Public Works.
- 4.12.6.1J** Prior to issuance/approval of any grading permits, off-site construction activities adjacent to residential uses shall provide for installation of 12-foot temporary sound barriers for construction activities lasting more than one month. The sound barrier will reduce noise levels by approximately 10 dB. The temporary sound barrier may be constructed of plywood with a total thickness of 1.5 inches, or a sound blanket wall may be used. If sound blankets are used, the curtains must have a Sound Transmission Class (STC) rating of 27 or greater. No off-site construction is permitted during weekday nighttime hours (8 p.m. to 6 a.m.) or during weekends and City holidays except for emergencies (per Noise Study MM N-7, pg.53).

Facts in Support of the Finding: According to Section 4.9 of the DEIR, two types of short-term noise impacts could occur during the construction of the Project. First, construction crew commutes and the transport of construction equipment and materials to the site for the Project would incrementally increase noise levels on access roads leading to the site. The second type of short-term noise impact is related to noise generated during excavation, grading, and building erection on the Project site. Construction of the Project is expected to require the use of scrapers, bulldozers, and water and pickup trucks. The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels, because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three to four minutes at lower power settings. The maximum noise level generated by each scraper on the Project site is assumed to be approximately 87 dBA L_{max} at 50 feet from the scraper. Each bulldozer would generate approximately 85 dBA L_{max} at 50 feet. The maximum noise level generated by water and pickup trucks is approximately 86 dBA L_{max} at 50 feet from these vehicles. Each doubling of the sound sources with equal strength increases the noise level by three (3) dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, the worst-case composite

noise level during this phase of construction would be 91 dBA L_{max} at a distance of 50 feet from the active construction area.

The nearest noise-sensitive receptor locations outside the Project site are existing residences approximately 50 feet to the southeast. These nearest residents may be subject to short-term, intermittent, maximum noise reaching 91 dBA L_{max} , generated by construction activities on the Project site. This noise level would exceed the City's exterior noise standard of 60 dBA²³ CNEL for residential uses. However, no significant construction noise impacts would occur if construction of the Project would occur within the permitted hours of 6:00 a.m. to 8:00 p.m. of any working day, and within the permitted hours of 7:00 a.m. and 8:00 p.m. on weekends and federal holidays. Compliance with the construction hours specified in the City's Municipal Code would result in construction noise impacts that are less than significant. While impacts would be considered less than significant as long as construction activities occur within the designated hours identified in the City's Municipal Code, mitigation measures have been identified to reduce the noise levels that would expose nearby sensitive receptors to noise levels in excess of the City's noise standards.

With adherence to the City's designated construction hours and with implementation of **Mitigation Measures 4.12.6.1A** through **4.12.6.1J**, potential short-term construction noise impacts would be reduced below the level of significance. (FEIR, Volume 3 pgs. 4.12-35 to 4.12-41)

b. Long-term Operational Noise

Potential Significant Impact: The EIR evaluated and concluded that the Project would cause exposure of persons to or generation of noise levels in excess of standards established in the City of Moreno Valley General Plan, Moreno Valley Municipal Code, or applicable standards of other agencies. Long-term operational noise impacts from the Project would be potentially significant.

Finding: Implementation of the following mitigation measures will reduce potential long-term operational noise impacts to less than significant:

- 4.12.6.1A** Prior to issuance of any discretionary permits, a Noise Reduction Compliance Plan (NRCP) shall be submitted to and approved by the City. The Noise Reduction Compliance Plan shall show the limits of nighttime construction in relation to any then-occupied residential dwellings and shall be in conformance with City standards. Conditions shall be added to any discretionary projects requiring that the limits of nighttime grading be shown on the Noise Reduction Compliance Plan and all grading

²³ Chapter 11.80.030 Table 11.80.030-2, City of Moreno Valley Municipal Code, City of Moreno Valley.

plans submitted to the City (per Noise Study MM N-2, pg.51).

Facts in Support of the Findings: Potential long-term stationary noise impacts would primarily be associated with operations at logistics facilities within the WLCSP area. Logistics facility uses would generate noise from truck delivery, loading/unloading activities at the loading areas, heating, ventilation, and air-conditioning (HVAC) equipment and other noise-producing activities within the parking lot (e.g., doors slamming, vehicle engine start-ups, and conversing in the parking lot). These activities are potential point sources of noise that could affect noise-sensitive receptors adjacent to the loading areas and parking lots. As noise spreads from a source, it loses energy; therefore, the farther away the noise receiver is from the noise source, the lower the perceived noise level would be.

Noise levels were measured at similar facilities to determine representative noise levels that might be generated by this type of activity. Noise measurements were made at two facilities; specifically, Lowes Distribution Center (3984 Indian Avenue, Perris, CA) and Ross Distribution Center (3404 Indian Avenue, Perris, CA).

The City of Moreno Valley Noise Ordinance requires that noise levels remain below 55 dBA (Leq) during nighttime hours. To achieve this noise level, the warehouse property line would only need to be 100 feet from the nearest residential property and no soundwall would need to be present.

Another consideration is whether the proposed activity levels will be substantially higher than current ambient conditions. No matter what is developed in the Specific Plan area, ambient conditions would be higher in future years due to higher levels of traffic and activity. Ambient noise levels were measured at seven sites that could border the World Logistics Center (i.e., Measurement Sites 3 through 9). The nighttime ambient noise levels (Leq) ranged from 35.8 to 61.8 dBA with an average for the sites of 46.6 dBA. To keep the noise levels at nearby residential areas less than typical ambient conditions, the logistics property line should be located a minimum distance of 250 feet and a 12-foot soundwall should be located along the perimeter of the property that faces any residential areas. This would keep the logistic use noise to less than 45 dBA (Leq) at the residences. The implementation of this buffer between logistics uses and noise sensitive uses has been included as **Mitigation Measure 4.12.6.1A**. (FEIR, Volume 3 pg. 4.12-41 to 4.12-56)

c. Long-term Utility Noise

Potential Significant Impact: The EIR evaluated and concluded that the Project would cause exposure of persons to or generation of noise levels in excess of standards established in the City of Moreno Valley

General Plan, Moreno Valley Municipal Code, or applicable standards of other agencies. Long-term utility noise impacts from the Project would be potentially significant.

Finding: Implementation of the following mitigation measures will reduce potential long-term utility noise impacts to less than significant:

4.12.6.4A Prior to the issuance of building permits for projects within 1,300 feet of the Southern California Gas Company (SCGC) and San Diego Gas and Electric (SDG&E) blow-down facilities, documentation shall be submitted to the City confirming that sound attenuation devices and/or improvements for the blow-down facilities providing at least a 40 dB reduction in noise levels during blow-down events are available and will be installed for all planned blow-down events. It shall be the responsibility of the developer to fund all sound attenuation improvements to the blow-down facilities required by this measure. It shall also be the responsibility of the developer to coordinate with San Diego Gas and Electric and/or Southern California Gas Company regarding the installation of any sound attenuation devices or improvements on the blow-down facilities at either the San Diego Gas and Electric compressor station or the Southern California Gas Company pipelines. This measure shall be implemented to the satisfaction of the City Land Management Division (per Noise Study MM N-11, pg.65).

Facts in Support of the Findings: There is one existing SDG&E compressor station and two existing SCGC facilities located within the WLC Specific Plan area.

The worst-case compressor station operational characteristics will result in a maximum noise level just above 65 CNEL within the Project area proposed for development (i.e., not open space). Typical commercial construction results in buildings that achieve at least a 20 dB reduction of outdoor noise levels. Therefore, an office use exposed to the highest noise level from the compressor station will be just above 45 CNEL and below the 50 CNEL limit prescribed by the City's General Plan, resulting in a less than significant impact and no mitigation is required. (Figure 4.12.3, FEIR, Volume 3, pg. 4.12-17)

The Leq noise level generated by the compressor station does not exceed 60 dBA Leq beyond the property lines of the facility. Therefore, the compressor station is not considered a noise disturbance based on City criteria. Operation of the compressor station would not result in any interior noise levels exceeding the limits established by the City in the General Plan. Therefore, noise impacts associated with the operation of the compressor station would be less than significant and no mitigation is required. (Figure 4.12.4, FEIR, Volume 3, pg. 4.12-19)

The maximum noise level from a blow-down at the SDG&E compressor station within the WLCSP area proposed for development (i.e., the Logistics Development land use) is 100 dBA. A person would need to be exposed to this level for more than two hours in a day before permanent hearing loss would be expected. As discussed above, blow-down events at the SDG&E compressor station typically do not last longer than 90 seconds. Therefore, the SDG&E blow-down events will not result in a significant impact to the uses proposed within the WLCSP area, and no mitigation is required. (Figure 4.12.5, FEIR, Volume 3, pg. 4.12-21)

For SCGC blow-down events, noise generated could reach as high as 130 dBA just outside the fence line of the southern facility and in excess of 135 dB just outside the fence line of the northern facility. People within approximately 250 feet of the blow-down points would be exposed to noise levels greater than 115 dBA, which would likely cause permanent hearing damage regardless of the exposure time. The SCGC blow-downs could last as long as 90 minutes. It is anticipated that people exposed to noise levels greater than 102 dBA, within approximately 1,300 feet from the blow-down point could experience permanent hearing loss based on this event duration. Noise generated by SCGC blow-down events has the potential to cause permanent hearing loss in persons in the developed area of the project. This is a significant impact and mitigation is required. (FEIR, Volume 3, pg. 4.12-57)

SCGC blow-down events also have the potential to produce groundborne vibration. However, the effect of the blow-down groundborne vibration would be limited to within 100 feet of the equipment and would not be perceived beyond the facility fence line, resulting in a less than significant impact and no mitigation is required. (FEIR, Volume 3, pg. 4.12-57 to 4.12-59)

11. Transportation

a. Existing (2012) With Phase 1 Project Conditions Traffic and Level of Service (On-site Roads and Intersections)

Potential Significant Impact: The EIR evaluated and concluded that Phase I of the Project could cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.

Findings: Implementation of the following mitigation measures will reduce the impact related to future traffic LOS (Existing 2012 with Phase 1 Project Buildout Conditions) to less than significant:

4.15.7.4A A traffic impact analysis (“TIA”) conforming to the guidelines for traffic impact analysis adopted by the City shall be submitted in conjunction with each Plot Plan application within the World Logistics Center Specific Plan. Prior to the approval of the Plot Plan,

the City shall review the traffic impact analysis to determine if any of the traffic improvements listed in Final EIR Volume 3 Tables 4.15.AV through 4.15.BA (TIA Tables 74 through 79) of the traffic impact analysis prepared for the Program Environmental Impact Report are required to be completed prior to the issuance of a certificate of occupancy for each building. If the City determines that any of the improvements within Moreno Valley are required to be constructed in order to ensure that the traffic impacts which will result from the construction and operation of the building will be mitigated into insignificance, then the completion of construction of the improvements prior to the issuance of a Certificate of Occupancy for the building shall be made a Condition of Approval of the Plot Plan. Construction of improvements within the City shall be subject to credit/reimbursement agreement for those DIF and/or TUMF eligible costs. If the City determines that any of the improvements outside Moreno Valley are required to be constructed in order to ensure that the traffic impacts which will result from the construction and operation of the building will be mitigated to a less than significant level, then the payment of any necessary fair share contribution as prescribed in Mitigation Measure 4.15.7.4G prior to the issuance of a Certificate of Occupancy for the building shall be made a Condition of Approval of the Plot Plan. If the City determines that the traffic impacts which will result from the construction or operation of a building will be significantly more adverse than those shown in the Program Environmental Impact Report, further environmental review shall be conducted prior to the approval of the Plot Plan pursuant to Public Resources Code § 21166 and CEQA Guidelines § 15162 to determine what additional mitigation measures, if any, will be required in order to maintain the appropriate levels of service.

- 4.15.7.4B** As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require the dedication of appropriate right-of-way consistent with the Subdivision Map Act for frontage street improvements contained within the World Logistics Center Specific Plan Circulation Map, as shown in this Program Environmental Impact Report Figure 3-10 (or Figure 22 in the Traffic Impact Analysis prepared for this Program Environmental Impact Report). Required dedications shall be made prior to the issuance of occupancy permits for the requested development.
- 4.15.7.4C** As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, City shall require each project to pay the

requisite Development Impact Fees (DIF) as set forth in Municipal Code Chapter 3.42. Required Development Impact Fee payments shall be made prior to the issuance of occupancy permits for the requested development.

4.15.7.4D As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, City shall require each project to pay the requisite Transportation Uniform Mitigation Fees (TUMF) as set forth in Municipal Code Chapter 3.44. Required Transportation Uniform Mitigation Fee payments shall be made prior to the issuance of occupancy permits for the requested development.

4.15.7.4E In order to ensure that all of the Project’s traffic impacts are mitigated to the greatest extent feasible, the Applicant shall contribute its fair share of the cost of the needed traffic improvements that are not within the City as identified in the World Logistic Center Specific Plan Traffic Impact Analysis (i.e., under the jurisdiction of other cities, the County of Riverside or Caltrans, pursuant to Mitigation Measure 4.15.7.4F). As used in this mitigation measure, the Applicant’s “fair share” has been determined in compliance with the requirements of the Fee Mitigation Act, Government Code § 66000 et seq., and, pursuant to § 66001(g), does not require that the Applicant be responsible for making up for any existing deficiencies.

For example, the intersection of Martin Luther King Blvd. and the I-215 northbound ramps (Intersection 85) in the City of Riverside was identified as a place where the World Logistic Center contributes to cumulatively significant impacts, and where the fair share contribution of the World Logistic Center project as a whole was computed to be 6.2%. If the City of Riverside establishes a fair share contribution program consistent with this Mitigation Measure 4.15.7.4F to improve that intersection, then when a certificate of occupancy is to be issued for a 2-million square feet high-cube warehouse in the World Logistic Center (approximately 5% of the entire World Logistic Center project) the amount of the fair share payment due from the Applicant to the City of Riverside would be computed as follows:

Amount Due	=	Total cost of Improvement	X	Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis	X	% attributable to the building that is subject to the certificate of occupancy (5%)
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A similar calculation would be done for each subsequent building, with payments for each due at the time of issuance of the certificate of occupancy. As a result, while each building individually would not produce a significant impact, and therefore would not be required to pay any mitigation fees if considered by itself, the total amount of the payments for all of the buildings would be equal to the fair share payment for the entire World Logistic Center to the extent that the responsible jurisdiction has chosen to adopt a fair share contribution funding program consistent with Mitigation Measure 4.15.7.4F.

4.15.7.4F The Applicant shall pay a portion of the fair share of the cost of traffic improvements identified in the Transportation Impact Analysis for those significantly impacted road segments and intersections for each warehouse building within the World Logistics Center if the impacted jurisdiction has established a fair share contribution program prior to the approval of a building-specific plot plan. The City shall determine whether a fair share program exists in the impacted jurisdiction and, if one does exist, require that the appropriate fees are paid by the Applicant, consistent with the requirements below, prior to the issuance of a certificate of occupancy for the building in question. If no fair share program exists or if the existing programs are not consistent with the requirements below, then no payment of fees shall be required. The impacts are to be determined on a road segment or intersection basis. Nothing in this condition requires the payment of a traffic impact fee imposed by another jurisdiction which covers improvement to facilities where the project does not have a significant impact. Fair-share contributions will be determined on a building-by-building basis as a share of the impact of the Project as a whole (for each segment or intersection where the World Logistics Center project as a whole has a significant impact identified in the Programmatic Environmental Impact Report) as determined by the Traffic Impact Analysis and will be due as each certificate of occupancy is issued. The fair share payments for the significantly impacted road segments and intersections identified in the Programmatic Environmental Impact Report will be required even though the impact resulting from a specific building does not, by itself, cause a significant impact.

4.15.7.4G City shall work directly with Western Riverside Council of Governments to request that Transportation Uniform Mitigation Fee funding priorities be shifted to align with the needs of the City, including improvements identified in the World Logistics Center Specific Plan traffic impact analysis. Toward this end, City shall meet regularly with Western Riverside Council of Governments.

Facts in Support of the Findings:

Intersection Analysis. Existing baseline (year 2012) with Phase 1 intersection levels of service for the study area intersections are summarized in FEIR, Volume 3 Section 4.15 Tables 4.15.AA-1 and 4.15.AA-2 (pgs. 4.15-93 to 4.15-102), which shows there are 15 study intersections where Phase 1 of the project would have a significant impact. Twelve of these intersections already exceed the threshold of significance under existing conditions and would therefore be considered cumulative impacts and mitigation is required. Phase 1 of the project would cause a direct project impact at the other three intersections as follows:

- Redlands Boulevard/Cactus Avenue;
- Arlington Avenue/Victoria Avenue; and
- Moreno Beach Drive/John Kennedy Drive.

Phase 1 of the Project would worsen the existing LOS deficiency at the following 12 intersections under existing with Phase 1 conditions:

- Redlands Boulevard/Locust Avenue;
- Redlands Boulevard/SR-60 Westbound Ramps;
- Oliver Street/Alessandro Boulevard;
- Lasselle Street/Cactus Avenue;
- Gilman Springs Road/Bridge Street;
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road;
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road;
- San Timoteo Canyon Road/Alessandro Boulevard;
- San Timoteo Canyon Road/Live Oak Canyon Road;
- Redlands Boulevard/San Timoteo Canyon Road;
- Moreno Beach Drive/SR-60 EB Ramps; and
- Alessandro Boulevard/Chicago Avenue.

Roadway Analysis. Existing baseline (year 2012) with Phase 1 roadway segment levels of service for the study area are summarized in FEIR, Volume 3 Section 4.15, Table 4.15.AB (pg. 4.15-105), which shows two roadway segments would operate at unsatisfactory levels of service. Phase 1 of the project would

contribute toward the worsening of an already unsatisfactory LOS at the two roadway segments and, therefore, have a significant cumulative impact at these locations.

Phase 1 of the Project would worsen the existing LOS deficiency at the following two roadway segments under existing with Phase 1 conditions:

- Gilman Springs Road between Alessandro Boulevard and Bridge Street; and
- Gilman Springs Road between SR-60 and Alessandro Boulevard.

The on-site improvements and changes to the road system within the WLC project site are being undertaken as part of the WLC project. The developer shall be responsible for constructing the improvements described in the TIA (Chapter 4, “Proposed Road Network”) in accordance with City standards for roadway construction and the roadway cross sections in the WLC Specific Plan. Completion of these improvements shall constitute the developer’s mitigation of the project’s on-site impacts. In addition implementation of **Mitigation Measures 4.15.7.4.A** through **4.15.7.4.G**, and implementation of all the improvements identified in FEIR, Volume 3 Section 4.15, Tables 4.15.AV through 4.15.BA (pgs. 4.15-197 through 4.15-224) direct and cumulative impacts on study area roadway segments and intersections would be reduced to less than significant for those roadways and intersections within the City of Moreno Valley. When these improvements are completed, the project’s impacts on the roadway system within the WLC project site will be mitigated to a less-than-significant level. (FEIR, Volume 3 Section 4.15, pg. 4.15-92 to 4.15-114)

b. Existing (2012) With Project (Buildout) Conditions Traffic and Level of Service (On-site Roads and Intersections)

Potential Significant Impact: The EIR evaluated and concluded that Project Buildout conditions could cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.

Findings: Implementation of the **Mitigation Measures 4.15.7.4.A** through **4.15.7.4.G** will reduce the impact related to future traffic LOS (Existing 2012 with Project Buildout Conditions) to less than significant.

Facts in Support of the Findings:

Intersections. Existing baseline (2012) with project buildout intersection levels of service for the study area intersections are summarized in Table 4.15.AF-1 and 4.15.AF-2, which shows there are 17 study

intersections where the project would contribute to a significant impact and mitigation is required. Twelve of these intersections already exceed the threshold of significance under existing conditions and would therefore be considered cumulative impacts. Those twelve intersections are:

- Redlands Boulevard/Locust Avenue;
- Redlands Boulevard/SR-60 Westbound Ramps;
- Oliver Street/Alessandro Boulevard;
- Moreno Beach Drive/SR-60 Eastbound Ramps;
- Lasselle Street/Cactus Avenue;
- Alessandro Boulevard/Chicago Avenue;
- Gilman Springs Road/Bridge Street;
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road;
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road;
- San Timoteo Canyon Road/Alessandro Road;
- San Timoteo Canyon Road/Live Oak Canyon Road; and
- Redlands Boulevard/San Timoteo Canyon Road.

The project would cause a direct project impact at the following five intersections:

- Redlands Boulevard/Cactus Avenue;
- Moreno Beach Drive/John Kennedy Drive;
- Moreno Beach Drive/Ironwood Avenue;
- Arlington Avenue/Victoria Avenue; and
- Bridge Street/Ramona Expressway.

The on-site improvements and changes to the road system within the WLC project site are being undertaken as part of the WLC project. The developer shall be responsible for constructing the improvements described in the TIA (Chapter 4, “Proposed Road Network”) in accordance with City standards for roadway construction and the roadway cross sections in the WLC Specific Plan. Completion of these improvements shall constitute the developer’s mitigation of the project’s on-site impacts. In addition implementation of **Mitigation Measures 4.15.7.4.A** through **4.15.7.4.G**, and implementation of

all the improvements identified in FEIR, Volume 3 Section 4.15, Tables 4.15.AV through 4.15.BA (pgs. 4.15-197 through 4.15-224) direct and cumulative impacts on study area roadway segments and intersections would be reduced to less than significant for those roadways and intersections within the City of Moreno Valley. When these improvements are completed, the project's impacts on the roadway system within the WLC project site will be mitigated to a less-than-significant level. (FEIR, Volume 3 Section 4.15, pg. 4.15-115 to 4.15-139).

c. Year (2022) With Phase 1 Project Conditions Traffic and Level of Service (On-site Roads and Intersections)

Potential Significant Impact: The EIR evaluated and concluded with Project Phase 1 added to Year 2022 conditions there would be an increase in traffic load and capacity on the street system which is significant.

Findings: Implementation of **Mitigation Measure 4.15.7.4A** through **4.15.7.4G** will reduce the Project's Phase 1 added to Year 2022 conditions impacts on traffic to less than significant.

Facts in Support of the Findings:

Intersection Analysis. Year 2022 with Phase 1 intersection levels of service for the study area intersections are summarized in FEIR, Volume 3, Section 4.15, Tables 4.15.AK-1 and 4.15.AK-2 (pg. 4.15-142 to 4.15-151), shows 34 study intersections operating at unsatisfactory LOS in the Year 2022 with Phase 1 condition. Twenty-eight of these intersections would exceed the threshold of significance under Year 2022 No Project conditions and would therefore be considered significant cumulative impacts requiring mitigation. At eight of these intersections the level of service would drop from satisfactory to unsatisfactory with the addition of Phase 1 traffic, which would also be considered a significant cumulative impact requiring mitigation. Those six intersections are:

- Redlands Boulevard/Cactus Avenue;
- Kitching Street/Iris Avenue;
- Perris Boulevard/John F. Kennedy Drive;
- Iris Avenue/Perris Boulevard;
- Heacock Street/Alessandro Boulevard; and
- Day Street/Alessandro Boulevard.

Roadway Analysis. Year 2022 with Phase 1 roadway segment levels of service for the study area intersections are summarized in FEIR, Volume 3, Section 4.15, Table 4.15.AL (pg. 4.15-, which shows three

roadway segments would operate at unsatisfactory levels of service. Phase 1 of the project would contribute toward the worsening of an already unsatisfactory LOS at two roadway segments and, therefore, have a significant cumulative impact at these locations. One roadway segment would drop from satisfactory to unsatisfactory level of service with the addition of Phase 1 traffic, which would also be considered a significant cumulative impact.

Phase 1 of the Project would have a significant cumulative impact at the following roadway segments under year 2022 with Phase 1 conditions:

- Gilman Springs Road between Alessandro Boulevard to Bridge Street; and
- Gilman Springs Road between SR-60 and Alessandro Boulevard.

Phase 1 of the Project would also create a significant cumulative impact at the following roadway segment under Year 2022 with Phase 1 conditions:

- Redlands Boulevard from Fir (future Eucalyptus) Avenue to the SR-60 Eastbound Ramps.

The Project's direct impacts on road sections are summarized in FEIR, Volume 3, Section 4.15, Table 4.15.AV (pg. 4.15-197). The project's direct impacts on study intersections are summarized in FEIR, Volume 3, Section 4.15, Table 4.15.AW (pg. 4.15-201). As individual projects within the WLC are processed, the City will require that each project do a traffic impact assessment in accordance with City guidelines. These project-level assessments will determine the timing of each transportation improvement measure and will ensure that the impact assumptions made in this programmatic EIR document are consistent with the analysis of potential impacts at the project-specific implementation stage. Section 4.15 of the FEIR, Volume 3 determined with the implementation of **Mitigation Measures 4.15.7.4.A** through **4.15.7.4.G**, and implementation of all the improvements identified in FEIR, Volume 3 Section 4.15, Tables 4.15.AV through 4.15.BA (pgs. 4.15-197 through 4.15-224) direct and cumulative impacts on study area roadway segments and intersections would be reduced to less than significant for those roadways and intersections within the City of Moreno Valley.

**d. Year 2035 With Project Buildout Conditions (Intersection)
Traffic and Level of Service Impacts**

Potential Significant Impact: The EIR evaluated and concluded that the Project could cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.

Findings: Implementation of **Mitigation Measure 4.15.7.4A** through **4.15.7.4G** will reduce the impact related to General Plan buildout to less than significant.

Facts in Support of the Findings: General Plan Buildout with Project conditions considers the addition of traffic generated by the Project to General Plan Buildout baseline conditions. An intersection LOS analysis was conducted to determine General Plan Buildout intersection performance. The addition of Project traffic to the General Plan Buildout scenario would result in conditions exceeding City and Caltrans LOS standards at 13 intersections.

All of the intersections that are forecast to experience a deficient LOS with the Project would also operate with a deficient LOS without the Project. Although the Project does not cause these intersections to operate at an unsatisfactory LOS, it does contribute to the worsening of the intersections' LOS and therefore mitigation would be required to offset the cumulative impact of the Project. (FEIR, Volume 3 pg. 4.15-167 to 4.15-187)

According to Section 4.15 of the FEIR, Volume 3, with the implementation of the recommended improvements, the minimum level of service standards would be maintained for the General Plan Build Out with Project scenario and impacts would be reduced to a less than significant level for all identified intersections. However, as noted previously, improvements to the freeway intersections and infrastructure are under the authority of Caltrans. In addition, the deficient freeway ramp intersections identified in **Mitigation Measure 4.15.7.4E** are already programmed into the TUMF program. It is anticipated that by the General Plan Buildout, improvements to the identified freeway ramps and intersections would be built through the TUMF process and coordination by Caltrans, WRCOG, and the City of Moreno Valley. Because the Project would pay its fair-share cost associated with these improvements and because such improvements are anticipated to be constructed by the future year (2035), impacts associated with this issue are less than significant after the identified mitigation measures have been implemented. (FEIR, Volume 3 pg. 4.15-167 to 4.15-187)

12. Utilities and Service Systems

a. Adequate Water Supply

Potential Significant Impact: The EIR evaluated and concluded that the Project could result in the lack of sufficient water supplies available to serve the project from existing entitlements.

Findings: Implementation of the following mitigation measures will reduce the project impacts on water supply to less than significant:

4.16.1.6.1A Prior to approval of a precise grading permit for each plot plan for development within the World Logistics Center Specific Plan (WLCSP), the developer shall submit landscape plans that demonstrate compliance with the World Logistics Center Specific Plan, the State of California Model Water Efficient Landscape Ordinance (AB 1881), and Conservation in Landscaping Act (AB 325). This measure shall be implemented to the satisfaction of the Planning Division. Said landscape plans shall incorporate the following:

- Use of xeriscape, drought-tolerant, and water-conserving landscape plant materials wherever feasible and as outlined in Section 6.0 of the World Logistics Center Specific Plan;
- Use of vacuums, sweepers, and other “dry” cleaning equipment to reduce the use of water for wash down of exterior areas;
- Weather-based automatic irrigation controllers for outdoor irrigation (i.e., use moisture sensors);
- Use of irrigation systems primarily at night or early morning, when evaporation rates are lowest;
- Use of recirculation systems in any outdoor water features, fountains, etc.;
- Use of low-flow sprinkler heads in irrigation system;
- Provide information to the public in conspicuous places regarding outdoor water conservation; and
- Use of reclaimed water for irrigation if it becomes available.

4.16.1.6.1B All buildings shall include water-efficient design features outlined in Section 4.0 of the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development Division/Public Works. These design features shall include, but not limited to the following:

- Instantaneous (flash) or solar water heaters;
- Automatic on and off water faucets;
- Water-efficient appliances;
- Low-flow fittings, fixtures and equipment;

- Use of high efficiency toilets (1.28 gallons per flush [gpf] or less);
- Use of waterless or very low water use urinals (0.0 gpf to 0.25 gpf);
- Use of self-closing valves for drinking fountains;
- Infrared sensors on drinking fountains, sinks, toilets and urinals;
- Low-flow showerheads;
- Water-efficient ice machines, dishwashers, clothes washers, and other water-using appliances;
- Cooling tower recirculating system where applicable;
- Provide information to the public in conspicuous places regarding indoor water conservation; and
- Use of reclaimed water for wash down if it becomes available.

4.16.1.6.1C Prior to approval of a precise grading permit for each plot plan, irrigation plans shall be submitted to and approved by the City demonstrating that the development will have separate irrigation lines for recycled water. All irrigation systems shall be designed so that they will function properly with recycled water if it becomes available. This measure shall be implemented to the satisfaction of the City Planning Division and Land Development Division/Public Works.

Facts in Support of the Findings: According to Section 4.16 of the FEIR, Volume 3, the Eastern Municipal Water District (EMWD) has determined that it will be able to provide adequate water supply to meet the potable water demand for the Project in addition to existing and future users. The WSA prepared for the Project by the EMWD concluded that the water demand for the proposed on-site uses would be approximately 1,991.25 AFY.²⁴ The EMWD considers this a “worst-case” estimate based on the total acres and amount of square footage of warehousing proposed by the project. This estimate does not take into account the project landscaping design with xeriscape (drought-tolerant plants) and on-site collection of runoff and channeling it to landscaped areas to minimize irrigation on the interior of the project site. For example, the “Water Budget Technical Memorandum’ prepared by CH2MHill (see EIR Appendix N) in September 2011 for the WLC Project indicates that actual water usage of on-site buildings, based on the specific development characteristics of the WLC Specific Plan, would be on the order of 450 AFY,

²⁴ *Water Supply Assessment Report for the World Logistics Center Specific Plan in Moreno Valley*, Eastern Municipal Water District, March 21, 2012.

which is less than a quarter of the amount estimated by EMWD; however, this estimate does not include on-site irrigation of landscaping and could only be achieved if all on-site landscaping was irrigated by collection and distribution of on-site runoff from roofs and hardscape areas.

Taking into account the Project's proposed water xeriscape landscaping plan, it is likely that actual water use for development within the WLC Specific Plan will be substantially less than the worst-case EMWD estimate. Therefore, for the purposes of analysis in this EIR, both the CH2MHill figure of 450 AFY and the EMWD's worst-case estimate of 1,991 AFY figure were used relative to water consumption. Under either scenario, the anticipated water demand for the WLC Project is substantially less than what is identified above for the General Plan land uses and what was used in the formulation of the 2010 UWMP. Anticipated water supplies in the EMWD total 213,900 and 302,200 AFY in 2015 and 2035, respectively. The water demand required for the WLC Project would total 0.93 and 0.66 percent of the EMWD's 2015 and 2035 supplies under worst-case conditions. The demand estimated for this project is substantially less and therefore still within the limit of growth projected in the 2010 UWMP.

Implementation of the Mitigation Measures **4.16.1.6.1A** through **4.16.1.6.1C** will reduce impacts to water supply over the long term to less than significant levels. (FEIR, Volume 3, pgs. 4.16-15 through 4.16-22).

b. Storm Water Drainage Requirements

Potential Significant Impact: The EIR evaluated and concluded that the Project could result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Findings: Implementation of the following mitigation measures will reduce the impact to storm water drainage to less than significant:

4.16.1.6.2A Each Plot Plan application for development shall include a concept grading and drainage plan, with supporting engineering calculations. The plans shall be designed such that the existing sediment carrying capacity of the drainage courses exiting the project area is similar to the existing condition. The runoff leaving the project site shall be comparable to the sheet flow of the existing condition to maintain the sediment carrying capacity and amount of available sediment for transport so that no increased erosion will occur downstream. This measure shall be implemented to the satisfaction of the Land Development Division/Public Works.

Facts in Support of the Findings: According to Section 4.16 of the FEIR, Volume 3, the Project would route storm water flows from the Project site into existing storm drains to the west and the San Jacinto

Wildlife Area to the south after flows are routed through a combination of water quality basins and sand filters. Due to the installation of impervious surfaces on the Project site, the post-development flows would be higher than the pre-development flows. To avoid a significant impact to the existing drainage capacity, the post-development flows coming from the Project site are required to be equal to or less than pre-development flows.²⁵ To reduce flows to below or equal to pre-development conditions, the on-site storm water flows would be routed to the on-site detention basins²⁶ before flows are routed off site. While the increase in impervious surfaces attributable to the Project would contribute to a greater volume and higher velocity of storm water flows, the Project's water quality basins would accept and accommodate runoff that would result from Project construction at pre-Project conditions.

As identified in the Preliminary Hydrology Calculations prepared for the Project, to adequately contain and store the greatest volume that would be generated, the Project site would require a minimum storage volume of 13.6 acre-feet. The proposed amount of storage area (20.3 acre-feet) is greater than the required amount of storage area. Based on this, it appears there is excess capacity of 6.7 acre-feet (20.3 acre-feet – 13.6 acre-feet = 6.7 acre-feet) of storage area available from the on-site detention basins; therefore, the Project appears to have adequate drainage capacity that would result in post-development flows being reduced to pre-development flows before leaving the Project site. However, to ensure that impacts associated with on-site drainage capacity are reduced to a less significant level, the **Mitigation Measures 4.9.6.1A** and **4.9.6.1B** and **4.16.1.6.2A** has been identified to reduce potential impacts to less than significant levels. (FEIR, Volume 3, pgs. 4.9-22 to 4.9-25)

c. Cumulative Impacts to Water Supply Services

Potential Significant Impact: The EIR evaluated and concluded that the Project could result in cumulative impacts to the water supply.

Findings: With implementation of the WLC Specific Plan as proposed and **Mitigation Measures 4.16.6.1A** through **4.16.6.1C**, potential cumulative impacts to regional long-term water supplies will not be cumulatively considerable.

Facts in Support of the Findings: According to Section 4.16 of the FEIR, Volume 3, the cumulative area for water supply-related issues is the EMWD service area. Existing and future development within

²⁵ As part of the MS4 Permit issuance requirements, projects must identify any Hydrologic Conditions of Concern and demonstrate that changes to hydrology are minimized to ensure that post-development runoff rates and velocities from a site do not adversely affect downstream erosion, sedimentation, or stream habitat.

²⁶ A detention basin is an area where excess storm water is stored or held temporarily and then slowly drains when water levels in the receiving channel recede. In essence, the water in a detention basin is temporarily detained until additional room becomes available in the receiving channel.

the EMWD's service area would demand additional quantities of water. The adopted UWMP (2010) projects population within the EMWD service area to increase to 1,111,729 persons by the year 2035. Increases in population, square footage, and intensity of uses would contribute to increases in the overall regional water demand. The anticipated conversion of water-intensive uses (i.e., agriculture) and the implementation of existing water conservation measures and recycling programs would reduce the need for increased water supply.

As previously identified, Metropolitan will continue to rely on the plans and policies outlined in its Regional Urban Water Management Plan (RUWMP) and Integrated Resources Plan (IRP) to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands. An aggressive campaign for voluntary conservation and recycled water usage, curtailment of groundwater replenishment water and agricultural water delivery are some of the actions outlined in the RUWMP. As previously stated, Metropolitan currently does not have surplus water available, due in part to pumping restrictions imposed on the SWP in place to avoid and minimize impacts to Federal- and State-protected fish species in the Delta. However, Metropolitan has analyzed the reliability of water delivery through the SWP and the Colorado River Aqueduct. Metropolitan's IRP and RUWMP conclude that, with the storage and transfer programs developed by Metropolitan, there will be a reliable source of water to serve its member agencies' needs through 2035. The EWMD would have water supplies for projected growth through 2035 in wet, dry, and multiple-dry years, so cumulative impacts to water supply would be less than significant. The WLC Project would connect to existing conveyance infrastructure and adequate treatment capacity is available, so the WLC Project would not make a significant contribution to any cumulatively considerable impacts on water supply or infrastructure.

With implementation of the WLC Specific Plan as proposed and **Mitigation Measures 4.16.6.1A** through **4.16.6.1C**, potential cumulative impacts to regional long-term water supplies will not be cumulatively considerable. (FEIR, Volume 3, pg. 4.16-26)

d. Construction or Expansion of Electrical and Natural Gas Facilities

Potential Significant Impact: The EIR evaluated and concluded that the Project could result in the construction or expansion of electrical and natural gas facilities, the construction of which could cause significant environmental effects.

Findings: Implementation of the following mitigation measures will reduce the impact to the construction or expansion of electrical and natural gas facilities to less than significant:

4.16.4.6.1A Each application for a building permit shall include energy calculations to demonstrate compliance with the California Energy Efficiency Standards confirming that each new structure meets applicable Building and Energy Efficiency Standards. The plans shall also ensure that buildings are in conformance with the State Energy Conservation Efficiency Standards for Nonresidential buildings (Title 24, Part 6, Article 2, California Administrative Code). This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions. Plans shall show the following:

- Energy-efficient roofing systems, such as “cool” roofs, that reduce roof temperatures significantly during the summer and therefore reduce the energy requirement for air conditioning.
- Cool pavement materials such as lighter-colored pavement materials, porous materials, or permeable or porous pavement, for all roadways and walkways not within the public right-of-way, to minimize the absorption of solar heat and subsequent transfer of heat to its surrounding environment.
- Energy-efficient appliances that achieve the 2008 Appliance Energy Efficiency Standards (e.g., EnergyStar Appliances) and use of sunlight-filtering window coatings or double-paned windows.

4.16.4.6.1B Prior to the issuance of any building permits within the World Logistics Center Specific Plan, each project developer shall submit energy calculations used to demonstrate compliance with the performance approach to the California Energy Efficiency Standards to the Building and Safety and Planning Divisions that shows each new structure meets the applicable Building and Energy Efficiency Standards. Plans may include but are not necessarily limited to implementing the following as appropriate:

- High-efficiency air-conditioning with electronic management system (computer) control.
- Variable Air Volume air distribution.
- Outside air (100 percent) economizer cycle.
- Staged compressors or variable speed drives to flow varying thermal loads.

- Isolated High-efficiency air-conditioning zone control by floors/separable activity areas.
- Specification of premium-efficiency electric motors (i.e., compressor motors, air handling units, and fan-coil units).
- Use of occupancy sensors in appropriate spaces.
- Use of compact fluorescent lamps in place of incandescent lamps.
- Use of cold cathode fluorescent lamps.
- Use of Energy Star exit lighting or exit signage.
- Use of T-8 lamps and electronic ballasts where applications of standard fluorescent fixtures are identified.
- Use of lighting power controllers in association with metal-halide or high-pressure sodium (high intensity discharge) lamps for outdoor lighting and parking lots.
- Use of skylights (may conflict with installation of solar panels in some instances).
- Consideration of thermal energy storage air conditioning for spaces or hotel buildings, meeting facilities, theaters, or other intermittent-use spaces or facilities that may require air-conditioning during summer, day-peak periods.

4.16.4.6.1C Prior to the issuance of a building permit, new development shall demonstrate that each building has implemented the following:

- 1) Install solar panels with a capacity equal to the peak daily demand for the ancillary office uses in each warehouse building;
- 2) Increase efficiency for buildings by implementing either 10 percent over the 2008 Title 24's energy saving requirements or the Title 24 requirements in place at the time the building permit is approved, whichever is more strict; and
- 3) Require the equivalent of "Leadership in Energy and Environmental Design Certified" for the buildings constructed at the World Logistics Center based on Leadership in Energy and Environmental Design Certified standards in effect at the time of project approval.

This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions.

Facts in Support of the Findings: According to Section 4.16 of the FEIR, Volume 3, the WLC Project would consume approximately 376,426 megawatt-hours (MWh) of electricity and almost 14.6 million cubic feet of natural gas per year. The estimated electrical demand assumes no on-site electrical generation by photovoltaic panels.

The WLC Specific Plan requires future installation of solar photovoltaic panels on the roof of each warehouse building to offset the energy demands of the office portion of the building. Utility improvements are based on a “worst-case” assumption that on-site solar electrical generation is not available and electrical service would have to be provided by Moreno Valley Electric Utility (MVEU). In addition, partial or complete connection to the existing electrical grid may be necessary even with roof-mounted solar photovoltaic panels so there is redundancy (backup) in case of an emergency or during nighttime when no on-site power is being generated (i.e., some warehouses may operate 24/7). At this time, it is not anticipated that any uses will install sufficient on-site power generation and storage to be totally independent of the existing electrical grid.

A number of Southern California Edison (SCE) facilities would still require relocation and expansion of MVEU facilities in order to provide network backup (i.e., if the solar generation equipment were to fail) and accommodate the potential increase in electrical demand no matter the contribution of project alternative energy generated. Power poles, guy poles, and guy anchors for the existing overhead 115 kV line along Theodore Street and Gilman Springs Road will need to be relocated at the time these roadways are widened. The portion of the existing 115 kV line along Eucalyptus Avenue may also need to be relocated into the new Eucalyptus Avenue alignment between Theodore Street and Gilman Springs Road at the time the roadway is constructed. The existing 115 kV line along Brodiaea Avenue may be able to be protected in place except for a few hundred feet where the transmission line intersects with the new Merwin Street, which will need to be relocated to accommodate street and storm drain channel improvements.

The existing 12 kV overhead power distribution lines along Redlands Boulevard will need to be undergrounded when the roadway is developed to its ultimate width. The existing 12 kV overhead power feeder lines located along Theodore Street and Alessandro Boulevard will need to be relocated and undergrounded as these roadway improvements take place during the development of the WLC project. The existing 12 kV overhead power feeder line running south along Virginia Street to the Moreno Compressor Station (planned as Open Space) will be protected in place. The existing overhead service

lines from the Theodore Street 12 kV line along Dracaea Avenue to the east and along Cottonwood Avenue to the west can be abandoned when existing on-site residences served by these facilities are abandoned. Per SCE requirements, SCE 12 kV undergrounded lines cannot be in a common trench with MVEU facilities and require a separate underground facility with a minimum 6 feet from other utility lines.

Based on the *Technical Memorandum – Dry Utilities World Logistics Center, Moreno Valley, CA*, (EIR Appendix N Utility Specialists, September 2014) prepared for the WLC project, construction of the first three logistics buildings that would occur during the initial phase of construction can be served by the existing MVEU substation at Cottonwood Avenue and Moreno Beach Drive, as long as capacity is still available at that station. Subsequent buildings in Phase 1 of construction will require the expansion of this substation. The expansion that would occur to meet this demand would be the addition of two new 28 MW transformer units which can be accommodated within the existing substation property. New 12 kV underground feeder circuits, including trenching, conduit, electrical vaults, and conductors will need to be installed from the substation to the WLC Project site. These improvements will occur along Cottonwood Avenue, along Moreno Beach Drive, and along Alessandro Boulevard, Brodiaea Avenue, and Cactus Avenue. These improvements are expected to take place concurrently with roadway construction.

To meet the WLC Project's ultimate annual demand of 376,426 MW, a new 112 MW substation will be constructed within the project limits at a central location near one of SCE's 115 kV transmission lines that will feed power to the substation. The *Dry Utilities* memo for the Project indicates two potential locations; the first adjacent to the SCE transmission lines along Gilman Springs Road, and the other adjacent to the SCE transmission lines along Brodiaea Avenue. Impacts of constructing the new station at either of these on-site locations may be the same.

SCE will require approximately 2 acres for a switching station near the new 112 kV substation proposed by MVEU to serve the WLC Project. All MVEU primary distribution conductors within the project will be installed within underground conduits and vaults within the public roadway rights-of-way or within easements as a joint trench with telephone, cable television, and natural gas. Since the installation or relocation of electrical facilities would take place concurrently with roadway construction and/or within dedicated easements, or protected in place, the construction of these facilities would not result in significant environmental effects.

The Project intends to achieve applicable elements of certification from the U.S. Green Building Council Leadership in Energy and Environmental Design (LEED), and encourages LEED Certification. The Project will require sophisticated construction techniques that will provide pollution prevention and

control such as noise, air quality, erosion and sediment controls. Both site planning and future building design will require current best practices for use of recycled materials and products, such as recycled steel, and crushed concrete and pavement materials. Low-emitting VOC building materials will be used on site.

Additionally, the WLC Project would be required to adhere to Title 24, Part 6, of the California Code of Regulations, which identifies energy efficiency standards for residential and nonresidential buildings. These standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The most recent standards were adopted and went into effect January 1, 2011. The 2011 standards for residential and non-residential buildings are expected to reduce the growth in electricity use and reduce the growth in natural gas use. Such standards include the provision of cool roofs, demand control ventilation, skylights for day-lighting in buildings, thermal breaks for metal building roofs and lighting power limits.

Compliance with such standards would be reviewed before the issuance of a building permit by the City. Because the WLC Project would be required to adhere to standards contained in Title 24 in addition to requirements set forth by the respective utility providers, development of the WLC Project would not result in the wasteful, inefficient or unnecessary consumption of energy. (FEIR, Volume 3, pgs. 4.16-38 to 4.16-42).

e. Cumulative Impacts to Energy Facilities

Potential Significant Impact: The EIR evaluated and concluded that the Project could result in the cumulative impacts to the energy facilities.

Findings: With implementation of the WLC Specific Plan as proposed and **Mitigation Measures 4.16.4.6.1A** through **4.16.4.6.1C**, potential cumulative impacts to energy facilities will not be cumulatively considerable.

Facts in Support of the Findings: According to Section 4.16 of the FEIR, Volume 3, the WLC Project would not result in significant impacts related to energy consumption with implementation of the WLC Specific Plan as proposed, and with the recommended project-specific mitigation measures. The Project will adhere to Title 24, Part 6, of the CCR, which identifies state energy efficiency standards. Adherence to these energy efficiency standards would reduce the amount of energy consumed by the WLC Project. The WLCSP will require future development to install solar photovoltaic panels on the roof of each building to meet the electrical demand of the office portion of each warehouse building. The WLC Project will implement “green building” characteristics and its design will help reduce energy consumption. With

these measures, the WLC Project will not make a significant contribution to cumulative energy facility impacts. (FEIR, Volume 3, pg. 4.16-42).

C. ENVIRONMENTAL IMPACTS NOT FULLY MITIGATED TO A LEVEL OF LESS-THAN-SIGNIFICANT

The Moreno Valley City Council finds the following environmental impacts identified in the EIR remain significant even after application of all feasible mitigation measures: aesthetics (individually and cumulative), air quality (individually and cumulative), land use and planning, noise, and transportation. In accordance with CEQA Guidelines Section 15092(b)(2), the City Council of the City of Moreno Valley cannot approve the Project unless it first finds (1) under *Public Resources Code* Section 21081(a)(3), and CEQA Guidelines Section 15091(a)(3), that specific economic, legal, social technological, or other considerations, including provisions of employment opportunities to highly trained workers, make infeasible the mitigation measures or Project alternatives identified in the EIR; and (2) under CEQA Guidelines section 15092(b), that the remaining significant effects are acceptable due to overriding concerns described in the CEQA Guidelines Section 15093 and, therefore, a statement of overriding considerations is included herein.

1. Aesthetics (Individual and Cumulative Impacts)

a. Scenic Vistas

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project could have adverse effects on one or more scenic vistas, notably views of the Badlands, Mount Russell Range, and Mystic Lake/San Jacinto Wildlife Area.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant but will be reduced to the extent feasible through mitigation measures. The Council finds that Mitigation Measures 4.1.6.1A through 4.1.6.1D, 4.1.6.3A, 4.1.6.4A, and 4.1.6.4B are incorporated into the MMRP for the Project, and will be implemented as specified therein. However, the Council finds that even with application of these mitigation measures, the Project will have a significant impact due to adverse effects on scenic vistas and therefore impacts are considered significant and unavoidable.

4.1.6.1A Each Plot Plan application for development along the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing or planned residential zoned uses) shall include a minimum 250-foot setback measured from the City/County zoning boundary line and any building or truck parking/access area within the project. The setback area shall include landscaping, berms, and walls to provide visual screening between the new development and existing residential areas upon maturity of the

landscaping materials. The existing olive trees along Redlands Blvd. shall remain in place as long as practical to help screen views of the project site. This measure shall be implemented to the satisfaction of the Planning Official.

- 4.1.6.1B** Each Plot Plan application for development adjacent to Redlands Boulevard, Bay Avenue, or Merwin Street, shall include a plot plan, landscaping plan, and visual rendering(s) illustrating the appearance of the proposed development. The renderings shall demonstrate that views of proposed buildings and trucks can be reasonably screened from view from existing residents upon maturity of planned landscaping and to ensure consistency with the General Plan Objective 7.7. “Effective” screening shall mean that no more than the upper quarter (25%) of a building is visible from existing residences, which shall be achieved through a combination of landscaping, berms, fencing, etc. The location and number of view presentations shall be at the discretion of the Planning Division.
- 4.1.6.1C** Prior to the issuance of a certificate of occupancy for buildings adjacent to the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing residences at the time of application) the screening required in Mitigation Measure 4.1.6.1A shall be installed in substantial conformance with the approved plans to the satisfaction of the Planning Official.
- 4.1.6.1D** Prior to the issuance of permits for any development activity adjacent to Planning Area 30 (74.3 acres in the southwest portion of the Specific Plan), the entirety of Planning Area 30 shall be offered to the State of California for open space purposes. In the event that the State does not accept the dedication, the property shall be offered to Western Riverside County Regional Conservation Authority or an established non-profit land conservancy for open space purposes. In the event that none of these organizations accepts the dedication, the property may be dedicated to a property owners association or may remain in private ownership and may be fenced and access prohibited.
- 4.1.6.3A** Each Plot Plan application for development shall include plans and visual rendering(s) illustrating any changes in views of Mount Russell and/or the Badlands, for travelers along SR-60, as determined necessary by the Planning Official. The plans and renderings shall illustrate typical views based on proposed project plans, with the location and number of view presentations to be determined by the Planning Official. These views shall be simulated from a height of six feet from the edge of the roadway travel lane closest to the visual resource. The renderings must demonstrate that the development will

preserve at least the upper two thirds (67%) of the vertical view of Mt. Russell from SR-60.

4.1.6.4A Each Plot Plan application for development adjacent to residential development shall include a photometric plot of all proposed exterior lighting demonstrating that the project is consistent with the requirements of Section 9.08.100 of the City Municipal Code. The lighting study shall indicate the expected increase in light levels at the property lines of adjacent residential uses. The study shall demonstrate that the proposed lighting fixtures and/or visual screening meet or exceed City standards regarding light impacts.

4.1.6.4B Each Plot Plan application for development shall include an analysis of all proposed solar panels demonstrating that glare from panels will not negatively affect adjacent residential uses or negatively affect motorists along perimeter roadways. Design details to meet these requirements shall be implemented to the satisfaction of the Planning Official.

Facts in Support of the Finding: According to Section 4.1 of the FEIR, Volume 3, the nearest sensitive permanent visual receptors would be the existing single-family residences to the west and southwest along Redlands Boulevard. In addition, the views of the motoring public along SR-60, Gilman Springs Road, Redlands Boulevard, Theodore Street, and Alessandro Boulevard would be significantly affected as well. At present, the Skechers building blocks views of the site for travelers on SR-60 who are immediately north of the Skechers building.

One of the development goals of the Specific Plan is to have the heights of the buildings along the north, west and south perimeter of the site, including SR-60, be approximately the same height as the existing Skechers building (i.e., approximately 55 feet above a ground elevation of 1,740 feet above mean sea level (amsl)). This means, as the site elevation decreases to the south, taller buildings theoretically could be built as long as they do not exceed 1,795 feet elevation (i.e., height above sea level, not building height above ground). This would result in seeing only the buildings adjacent to the freeway for eastbound travelers on SR-60, but it would adversely affect views from other locations around the WLC Specific Plan site regardless of the height comparison to the Skechers building. The motoring public heading westbound on SR-60 would experience impacts to their views of Mount Russell.

Many of the views of the motoring public while on local roadways will fundamentally change instead of views of open agricultural land, these residents and motorists will view new logistics buildings and the associated parking areas, roadways, infrastructure, and landscaping. Therefore, the Project will have a significant visual impact. The degree to which these buildings may block views of major scenic resources (i.e., Mount Russell, the Badlands, and Mystic Lake) will depend on the location and heights of buildings.

This impact requires mitigation; however, this change in views, while substantial, is anticipated in the City's General Plan, which allows development within the Project area. At present, the General Plan allows development of a mixed-use residential community (i.e., Moreno Highlands Specific Plan), which would mainly be one-story and two-story buildings (approximate maximum height 35 feet). The WLC Specific Plan proposes to instead develop the site with logistics warehouse buildings (maximum height 60–80 feet), so this change in itself would represent a significant visual impact. In addition, the eventual change in views from existing (baseline) conditions is substantial and is considered a significant visual impact on scenic vistas. After implementation of the **Mitigation Measures 4.1.6.1A** through **4.1.6.1C**, adverse effects on scenic vistas would remain significant and unavoidable due to the fundamental change in public views for residents within and surrounding the Project site, for travelers on SR-60, Gilman Springs Road, Redlands Boulevard, Theodore Street, and Alessandro Boulevard, and for users of the San Jacinto Wildlife Area. (FEIR, Volume 3, pgs. 4.1-61 to 4.1-73 and 4.1-82 to 4.1-83).

b. Scenic Resources and Scenic Highways

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project could have a significant impact on the views of scenic resources for motorists traveling on SR-60 and Gilman Springs Road.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant but will be reduced to the extent feasible through mitigation measures. The Council finds that **Mitigation Measures 4.1.6.1A** through **4.1.6.1D**, **4.1.6.3A**, **4.1.6.4A**, and **4.1.6.4B** are incorporated into the MMRP for the Project, and will be implemented as specified therein. However, the Council finds that even with application of these mitigation measures, the Project-related impacts to scenic vistas and scenic highways will remain significant and unavoidable.

Facts in Support of the Finding: According to Section 4.1 of the FEIR, Volume 3, the City of Moreno Valley identifies SR-60 and Gilman Springs Road as local scenic roads. According to the City's General Plan EIR, major scenic resources within the Moreno Valley study area are visible from SR-60, and Gilman Springs Road, both of which are City-designated local scenic roadways. Development of the Project would significantly alter the existing view by introducing large industrial buildings adjacent to the freeway. Existing eastbound and westbound views on SR-60 and Gilman Springs Road would be fundamentally altered with the future development of the Project.

The perimeter portions of the site will have buildings with heights up to 60 feet, and some of the buildings south of Street C (southeastern portion of the site but not adjacent to the San Jacinto Wildlife

Area), would have heights of up to 80 feet. Since the Skechers building (roof height approximately 1,790 feet amsl) is already visible throughout the Project site and from off-site areas to the east, south, and southwest, it is likely that most new buildings will be visible from these areas or possibly even farther away, depending on building heights and locations. The use of light colors and reflective surfaces such as glass and polished metal near office entrances and building corners, such as required in the WLC Specific Plan design guidelines, will enhance the visibility of these buildings.

The proposed sound walls and ornamental landscaping would soften the visual impacts of future buildings, but the Project would likely result in at least a partial obstruction of a portion of the Mount Russell Range for motorists traveling on SR-60, so the proposed buildings may obstruct the view of a major scenic feature from a City-designated scenic route. The Project meets criteria in both the moderate and major visual intrusion categories. Therefore, it is anticipated that the WLC Specific Plan design guidelines may create a major visual intrusion (i.e., significant impact) for motorists traveling on SR-60 and Gilman Springs Road.

The WLC Specific Plan can preserve significant visual features, significant views, and vistas if the size and location of buildings developed under the WLC Specific Plan can be controlled so as to not substantially block views of Mount Russell, the Badlands, and Mystic Lake. The views from SR-60 and Gilman Springs Road will fundamentally change, but their views of major scenic resources (i.e., Mount Russell, the Badlands, and Mystic Lake) may be preserved through careful limitations on the height and location of future buildings. The WLC Specific Plan outlines how future development along SR-60 and Gilman Springs Road will be made visually attractive and can maintain some view corridors of the surrounding mountains and Mystic Lake through careful limitations on the height and location of future buildings. These are considered significant visual impacts on local scenic roads that will require mitigation.

Construction of future logistics warehousing according to the development standards and design guidelines of the WLC Specific Plan will help soften building façades, and the installation of ornamental landscaping will help buffer the visual appearance of the buildings from SR-60, but the obstruction of local views will still be significant. Implementation of **Mitigation Measures 4.1.6.1A through 4.1.6.1D, 4.1.6.3A, 4.1.6.4A, and 4.1.6.4B** will help reduce these impacts, but not to less than significant levels. (FEIR, Volume 3, pgs. 4.1-73 to 4.1-76).

c. Existing Visual Character and Surroundings

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project could significantly degrade the existing visual character of the Project site from open space to an urbanized setting by introducing large high cube logistics warehouse buildings.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant but will be reduced to the extent feasible through mitigation measures. The Council finds that **Mitigation Measures 4.1.6.1A through 4.1.6.1D, 4.1.6.3A, 4.1.6.4A, and 4.1.6.4B** are incorporated into the MMRP for the Project, and will be implemented as specified therein. However, the Council finds that even with application of this mitigation measure, the Project will have significant Project-related impacts to the existing visual character of the site and will remain significant and unavoidable.

Facts in Support of the Finding: Visual impacts associated with changes to the general character of the Project site (e.g., loss of open space), the components of the visual settings (e.g., landscaping and architectural elements), and the visual compatibility between proposed site uses and adjacent land uses would occur. The significance of visual impacts is inherently subjective as individuals respond differently to changes in the visual characteristics of an area. According to Section 1.4 of the FEIR, Volume 3, the Project site is currently undeveloped with existing agricultural fields throughout the site. Development of the proposed industrial uses on the Project site would include approximately 40.6 million square feet of warehouse distribution uses with associated parking areas, ornamental landscaping, and roadway and infrastructure on approximately 2,635 acres. Maximum building heights will range from 60 to 80 feet depending on location within the Project and will substantially change the views of both nearby residents and motorists on adjacent roadways.

The Project would also change views for travelers on the adjacent portion of SR-60 and Gilman Springs Road by introducing large industrial buildings in place of agricultural vacant land. The proposed buildings closest to the freeway would most likely have an average height of approximately 55 to 60 feet, although the maximum height may be increased by 10 feet, which would exceed the existing height of the adjacent freeway by approximately 30 feet.

Development of the Project would substantially and fundamentally change the existing character of the Project site from open space to an urbanized setting with many large logistics buildings. The change in the character of the site would constitute a significant alteration of the existing visual character of the WLC Project site, regardless of the architectural treatment and landscaping of the site. These impacts

would be especially significant for residents of the existing residences on the Project site, depending on the timing, location, and size of development in the future.

The WLC Specific Plan includes a variety of architectural elements including façade accents such as corner treatments and roof trim. The Project also provides variation in wall planes that serve to avoid an institutional appearance and break up the bulk of the buildings. This variation would create shadow lines at various times of the day.

The proposed setbacks, landscaping, berms, and walls outlined in the Specific Plan appear sufficient to provide adequate visual screening between proposed warehouse buildings and the existing residential uses. However, mitigation is required to ensure the actual design and appearance of setback areas will effectively screen new development from existing residences and neighboring roadways.

However, even with implementation of **Mitigation Measures 4.1.6.1A through 4.1.6.1D, 4.1.6.3A, 4.1.6.4A, and 4.1.6.4B** the substantial change in visual character of the Project site and surrounding area from development of the Project will cause aesthetic impacts to remain significant and unavoidable. (FEIR, Volume 3, pgs. 4.1-76 to 4.1-80)

d. Cumulative Aesthetics Impacts

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project could in connection with past, present, and probable future projects adversely affect one or more scenic vistas.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant as there are no known feasible mitigation measures that could reduce this cumulative impact to a level of less than significant. Accordingly, Project-related cumulative impacts to scenic vistas will remain significant and unavoidable.

Facts in Support of the Finding: The Project, in combination with other projects in the eastern portion of the City and along SR-60 and Gilman Springs Road, would have a cumulatively significant and unavoidable impact related to views, scenic resources, night lighting, and glare in this portion of the City.

The development of the Project would partially obstruct views of surrounding mountain vistas from various vantage points in and around the Project area. Partial view opportunities would continue to be available over future buildings, along roadways, between development areas, etc. Development of lands within the City, particularly along SR-60, would result in the cumulative conversion from open space to urbanized land uses. The Project would continue the development of logistics uses along the south side of SR-60 east of the City's Auto Center. The Project, in conjunction with other cumulative projects, would

be developed in a manner consistent with existing development trends in the City. Since other projects in the area will include similar distribution uses, it can be anticipated that such uses would have a similar design and massing as the Project. Since the Project would affect views of the surrounding mountains, it is reasonable to conclude that similar warehouse distribution uses would also obstruct views of the surrounding mountains. However, the analysis in Section 4.1.6.1 determined visual impacts, though substantial, were consistent with applicable General Plan policies (Policy 7.7.4 in the Conservation Element). Based on this analysis, the Project, in combination with other cumulative projects in the surrounding area, will have a cumulatively significant and unavoidable impact related to aesthetics (i.e., views, scenic resources, and lighting) in this portion of the City.

The proposed, existing, and future development within the planning area will increase the amount of light and glare in the area. The cumulative lighting-related impacts of this new development would be reduced through the adherence to applicable City Municipal Code lighting standards. However, this Project, in combination with the Auto Center and other approved high cube logistics developments in this portion of the City, will result in cumulatively considerable light and glare impacts, and the Project will make a significant contribution to that cumulative impact. (FEIR, Volume 3, pgs. 4.1-82 to 4.1-83)

2. Air Quality

a. Air Quality Management Plan Consistency

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project could conflict with implementation of the SCAQMD 2012 Air Quality Plan Management Plan (AQMP).

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant as there are no known feasible mitigation measures that could reduce this impact to a level of less than significant. Accordingly, Project-related impacts related to air quality plan management plan consistency are significant and unavoidable.

Facts in Support of the Finding: An AQMP describes air pollution control strategies to be taken by counties or regions classified as nonattainment areas. The AQMP's main purpose is to bring the area into compliance with the requirements of Federal and State air quality standards. The AQMP uses the assumptions and projections by local planning agencies to determine control strategies for regional compliance status. Therefore, any projects causing a significant impact on air quality would impede the progress of the AQMP. CEQA requires that projects resulting in a General Plan Amendment be analyzed for consistency with the AQMP.

For a Project in the Basin to be consistent with the AQMP, the pollutants emitted from the Project must not exceed the South Coast AQMD significant thresholds or cause a significant impact on air quality. One measurement tool in determining consistency with the AQMP is to determine how a Project accommodates the expected increase in population or employment. The Project site is located in an urbanizing area of the City of Moreno Valley along SR-60, which accommodates traffic in the area. In addition, the proposed warehouse uses would be within walking distance of existing homes and commercial areas in the local vicinity. The Project would add jobs resulting from the development of the warehouse uses to the City, with the potential to minimize the VMT traveled within the Project site and community.

The SCAQMD also has the following consistency criteria: a project cannot result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP; and a project cannot exceed the assumptions in the AQMP in 2010 or increments based on the year of Project build-out phase.

The Project would exceed the regional emission significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5} after application of mitigation. This means that Project emissions of VOC and NO_x could combine with other sources and could result in an ozone, PM₁₀, or PM_{2.5} exceedance at a nearby monitoring station. The Basin in which the Project is located is in nonattainment for these pollutants; therefore, according to this criterion, the Project would not be consistent with the AQMP. The regional emissions assume a zero baseline for existing emissions and therefore assumes that the AQMP had no emissions for the Project site. The regional significance thresholds can be interpreted to mean that if Project emissions exceed the thresholds, then the Project would also not be consistent with the assumptions in the AQMP. The Project does not meet this criterion.

Although the Project would be consistent with the policies, rules, and regulations in the AQMPs and State Implementation Plans (SIPs), the Project must meet all the criteria to be consistent with the AQMPs. The Project could impede AQMP attainment because its construction and operation emissions exceed the SCAQMD regional significance thresholds, so the Project is considered to be inconsistent with the AQMP. To facilitate monitoring and compliance, applicable SCAQMD regulatory requirements are restated in **Mitigation Measures 4.3.6.2A through 4.3.6.2D, 4.3.6.3B, and 4.3.6.4A**. These measures shall be incorporated in all Project plans, specifications, and contract documents. Despite the implementation of mitigation measures, emissions associated with the Project cannot be reduced below the applicable thresholds. In the absence of feasible mitigation to reduce the Project's emission of criteria

pollutants to below SCAQMD thresholds, potential air quality impacts resulting from exhaust from construction equipment will remain significant and unavoidable. (FEIR, Volume 3, pgs. 4.3-71 to 4.3-75)

b. Construction Emissions

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project has the potential to exceed applicable daily thresholds that may affect sensitive receptors.

For construction operations, the applicable daily thresholds are:

- 75 pounds per day of ROC/VOC;
- 100 pounds per day of NO_x;
- 550 pounds per day of CO;
- 150 pounds per day of PM₁₀;
- 150 pounds per day of SO_x; and
- 55 pounds per day of PM_{2.5}.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant but will be reduced to the extent feasible through mitigation measures. The Council finds that **Mitigation Measures 4.3.6.2A** through **4.3.6.2D** are incorporated into the MMRP for the Project, and will be implemented as specified therein. However, the Council finds that even with application of these mitigation measures, the Project will have a significant impact due to equipment exhaust from construction related activities and therefore impacts are considered significant and unavoidable.

4.3.6.2A Construction equipment maintenance records (including the emission control tier of the equipment) shall be kept on site during construction and shall be available for inspection by the City of Moreno Valley.

- a) Off-road diesel-powered construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency Tier 4 off-road emissions standards. A copy of each unit's certified tier specification shall be available for inspection by the City at the time of mobilization of each applicable unit of equipment.
- b) During all construction activities, off-road diesel-powered equipment may be in the "on" position not more than 10 hours per day.

- c) Construction equipment shall be properly maintained according to manufacturer specifications.
- d) All diesel powered construction equipment, delivery vehicles, and delivery trucks shall be turned off when not in use. On-site idling shall be limited to three minutes in any one hour.
- e) Electrical hook ups to the power grid shall be provided for electric construction tools including saws, drills and compressors, where feasible, to reduce the need for diesel-powered electric generators. Where feasible and available, electric tools shall be used
- f) The project shall demonstrate compliance with South Coast Air Quality Management District Rule 403 concerning fugitive dust and provide appropriate documentation to the City of Moreno Valley.
- g) All construction contractors shall be provided information on the South Coast Air Quality Management District Surplus Offroad Opt-In “SOON” funds which provides funds to accelerate cleanup of off-road diesel vehicles.
- h) Construction on-road haul trucks shall be model year 2007 or newer.
- i) Information on ridesharing programs shall be made available to construction employees.
- j) During construction, lunch options shall be provided onsite.
- k) A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints per AQMD Standards.
- l) Only non-diesel material handling equipment may be used in any logistics building in the WLC.
- m) Off-site construction shall be limited to the hours between 6 a.m. to 8 p.m. on weekdays only. Construction during City holidays shall not be permitted.

4.3.6.2B

Prior to issuance of any grading permits, a traffic control plan shall be submitted to and approved by the City of Moreno Valley that describes in detail the location of equipment staging areas, stockpiling/storage areas, construction parking areas, safe detours around the project construction site, as well as provide temporary traffic control (e.g., flag person) during construction-related truck hauling activities. Construction trucks shall be rerouted away from sensitive receptor areas. Trucks shall use State Route 60 using

Theodore Street, Redlands Boulevard (north of Eucalyptus Avenue), and Gilman Springs Road. In addition to its traffic safety purpose, the traffic control plan can minimize traffic congestion and delays that increase idling emissions. A copy of the approved Traffic Control Plan shall be retained on site in the construction trailer.

4.3.6.2C The following measures shall be applied during construction of the project to reduce volatile organic compounds (VOC):

- a) Non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the project to the maximum extent practicable. If such products are not commercially available, products with a VOC content of 100 grams per Liter or lower for both interior and exterior surfaces shall be used.
- b) Leftover paint shall be taken to a designated hazardous waste center.
- c) Paint containers shall be closed when not in use
- d) Low VOC cleaning solvents shall be used to clean paint application equipment.
- e) Paint and solvent-laden rags shall be kept in sealed containers.

4.3.6.2D No grading shall occur on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 24).

Facts in Support of the Finding: Grading and other construction activities produce combustion emissions from various sources such as site grading, utility engines, on-site heavy-duty construction vehicles, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew. The use of construction equipment on site would result in localized exhaust emissions. Activity during peak grading days typically generates a greater amount of air pollutants than other Project construction activities.

Section 4.3 of the FEIR, Volume 3 indicates that construction emissions of criteria pollutants would exceed the SCAQMD daily emission thresholds for all criteria pollutants, with the exception of SO_x.²⁷ This is a significant impact requiring mitigation.

Fugitive dust emissions are generally associated with land clearing and exposure of soils to the air and wind, and cut-and-fill grading operations. The Project will be required to comply with SCAQMD Rules

²⁷ The Project would emit SO_x from construction equipment exhaust; however, the maximum emissions (6.8 pounds per day) are less than significant as they are far below the threshold of 150 pounds per day.

402 and 403 to control fugitive dust. There are a number of feasible control measures that can be reasonably implemented to significantly reduce PM₁₀ emissions from construction. Fugitive dust and exhaust emissions (i.e., PM₁₀) during the anticipated peak construction day for the Project would exceed SCAQMD daily construction thresholds. (FEIR, Volume 3, pgs. 4.3-75 to 4.3-80)

c. Localized Construction and Operational Air Quality Impacts

Significant Unavoidable Impact. The EIR evaluated and concluded that the Project would have short-term and long term significant impacts from PM₁₀ emissions.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant but will be reduced to the extent feasible through mitigation measures. The Council finds that **Mitigation Measures 4.3.6.2A** through **4.3.6.2D** and **Mitigation Measures 4.3.6.3A** through **4.3.6.3E** reduce construction emissions of criteria pollutants are incorporated into the MMRP for the Project, and will be implemented as specified therein. However, the Council finds that even with application of these mitigation measures, localized air quality impacts related are considered significant and unavoidable.

4.3.6.2A Construction equipment maintenance records (including the emission control tier of the equipment) shall be kept on site during construction and shall be available for inspection by the City of Moreno Valley.

- a) Off-road diesel-powered construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency Tier 4 off-road emissions standards. A copy of each unit's certified tier specification shall be available for inspection by the City at the time of mobilization of each applicable unit of equipment.
- b) During all construction activities, off-road diesel-powered equipment may be in the "on" position not more than 10 hours per day.
- c) Construction equipment shall be properly maintained according to manufacturer specifications.
- d) All diesel powered construction equipment, delivery vehicles, and delivery trucks shall be turned off when not in use. On-site idling shall be limited to three minutes in any one hour.

- e) Electrical hook ups to the power grid shall be provided for electric construction tools including saws, drills and compressors, where feasible, to reduce the need for diesel-powered electric generators. Where feasible and available, electric tools shall be used
- f) The project shall demonstrate compliance with South Coast Air Quality Management District Rule 403 concerning fugitive dust and provide appropriate documentation to the City of Moreno Valley.
- g) All construction contractors shall be provided information on the South California Air Quality Management District Surplus Offroad Opt-In “SOON” funds which provides funds to accelerate cleanup of off-road diesel vehicles.
- h) Construction on-road haul trucks shall be model year 2007 or newer.
- i) Information on ridesharing programs shall be made available to construction employees.
- j) During construction, lunch options shall be provided onsite.
- k) A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints per AQMD Standards.
- l) Only non-diesel material handling equipment may be used in any logistics building in the WLC.
- m) Off-site construction shall be limited to the hours between 6 a.m. to 8 p.m on weekdays only. Construction during City holidays is not permitted.

4.3.6.2B

Prior to issuance of any grading permits, a traffic control plan shall be submitted to and approved by the City of Moreno Valley that describes in detail the location of equipment staging areas, stockpiling/storage areas, construction parking areas, safe detours around the project construction site, as well as provide temporary traffic control (e.g., flag person) during construction-related truck hauling activities. Construction trucks shall be rerouted away from sensitive receptor areas. Trucks shall use State Route 60 using Theodore Street, Redlands Boulevard (north of Eucalyptus Avenue), and Gilman Springs Road. In addition to its traffic safety purpose, the traffic control plan can minimize traffic

congestion and delays that increase idling emissions. A copy of the approved Traffic Control Plan shall be retained on site in the construction trailer.

4.3.6.2C The following measures shall be applied during construction of the project to reduce volatile organic compounds (VOC):

- a) Non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the project to the maximum extent practicable. If such products are not commercially available, products with a VOC content of 100 grams per Liter or lower for both interior and exterior surfaces shall be used.
- b) Leftover paint shall be taken to a designated hazardous waste center.
- c) Paint containers shall be closed when not in use
- d) Low VOC cleaning solvents shall be used to clean paint application equipment.
- e) Paint and solvent-laden rags shall be kept in sealed containers.

4.3.6.2D No grading shall occur on days with an Air Quality Index forecast greater than 150 for particulates or ozone.

4.3.6.3A Prior to issuance of occupancy permits for each warehouse building within the WLCSP, the developer shall demonstrate to the City that vehicles can access the building using paved roads and parking lots.

4.3.6.3B The following shall be implemented as indicated:

Prior to Issuance of a Certificate of Occupancy

- a) Signs shall be prominently displayed informing truck drivers about the California Air Resources Board diesel idling regulations, and the prohibition of parking in residential areas.
- b) Signs shall be prominently displayed in all dock and delivery areas advising of the following: engines shall be turned off when not in use; trucks shall not idle for more than three consecutive minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report air quality violations.

- c) Signs shall be installed at each exit driveway providing directional information to the City's truck route. Text on the sign shall read "To Truck Route" with a directional arrow. Truck routes shall be clearly marked per the City Municipal Code.

On an Ongoing Basis

- d) Tenants shall maintain records on fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles are maintained pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.
- e) Tenant's staff in charge of keeping vehicle records shall be trained/certified in diesel technologies, by attending California Air Resources Board approved courses (such as the free, one-day Course #512). Documentation of said training shall be maintained on-site and be available for inspection by the City.
- f) Tenants shall be encouraged to become a SmartWay Partner.
- g) Tenants shall be encouraged to utilize SmartWay 1.0 or greater carriers.
- h) Tenants' fleets shall be in compliance with all current air quality regulations for on-road trucks including but not limited to California Air Resources Board's Heavy-Duty Greenhouse Gas Regulation and Truck and Bus Regulation.
- i) Information shall be posted in a prominent location available to truck drivers regarding alternative fueling technologies and the availability of such fuels in the immediate area of the World Logistics Center.
- j) Tenants shall be encouraged to apply for incentive funding (such as the Voucher Incentive Program [VIP], Carl Moyer, etc.) to upgrade their fleet.
- k) All yard trucks (yard dogs/yard goats/yard jockeys/yard hostlers) shall be powered by electricity, natural gas, propane, or an equivalent non-diesel fuel. Any off-road engines in the yard trucks shall have emissions standards equal to Tier 4 Interim or greater. Any on-road engines in the yard trucks shall have emissions standards that meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
- l) All diesel trucks entering logistics sites shall meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Facility

operators shall maintain a log of all trucks entering the facility to document that the truck usage meets these emission standards. This log shall be available for inspection by City staff at any time.

- m) All standby emergency generators shall be fueled by natural gas, propane, or any non-diesel fuel.
 - n) Truck and vehicle idling shall be limited to three (3) minutes.
- 4.3.6.3C** Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area, a publically-accessible fueling station shall be operational within the Specific Plan area offering alternative fuels (natural gas, electricity, etc.) for purchase by the motoring public. Any fueling station shall be placed a minimum of 1000 feet from any off-site sensitive receptors or off-site zoned sensitive uses. This facility may be established in connection with the convenience store required in Mitigation Measure 4.3.6.3D.
- 4.3.6.3D** Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area a site shall be operational within the Specific Plan area offering food and convenience items for purchase by the motoring public. This facility may be established in connection with the fueling station required in Mitigation Measure 4.3.6.3C.
- 4.3.6.3E** Refrigerated warehouse space is prohibited unless it can be demonstrated that the environmental impacts resulting from the inclusion of refrigerated space and its associated facilities, including, but not limited to, refrigeration units in vehicles serving the logistics warehouse, do not exceed any environmental impact for the entire World Logistics Center identified in the program Environmental Impact Report. Such environmental analysis shall be provided with any warehouse plot plan proposing refrigerated space. Any such proposal shall include electrical hookups at dock doors to provide power for vehicles equipped with Transportation Refrigeration Units (TRUs).

Facts in Support of the Findings: According to FEIR, Volume 3, Table 4.3.L, during Phase 1 (2012) the Project would exceed the SCAQMD's significance thresholds for NO₂ and PM₁₀ for receptors located within the Project's boundaries and PM₁₀ at receptors located outside of the project's boundaries. The majority of the Project's operational emissions are from on-road mobile sources, more particularly, heavy-duty trucks that contribute a disproportionate amount of emissions compared to passenger vehicles.

Emissions from on-road mobile sources are regulated at the State and Federal levels and, therefore, are outside of the control of local agencies such as the City and the SCAQMD. Emission controls on mobile source vehicles already adopted by the (California) Air Resources Board (ARB) particularly dealing with NO_x and PM₁₀ controls on heavy duty trucks will reduce truck emissions significantly over the next 10 years.

According to FEIR, Volume 3, Table 4.2.N during Phase 1 and Phase 2 (2012) the Project would exceed the SCAQMD's significance thresholds for NO₂, PM₁₀ and PM_{2.5} for receptors located within the Project's boundaries and NO₂ and PM₁₀ at receptors located outside of the project's boundaries. The majority of the Project's operational emissions are from on-road mobile sources, more particularly, heavy-duty trucks that contribute a disproportionate amount of emissions compared to passenger vehicles. Emissions from on-road mobile sources are regulated at the State and Federal levels and, therefore, are outside of the control of local agencies such as the City and the SCAQMD. Emission controls on mobile source vehicles already adopted by the ARB particularly dealing with NO_x and PM₁₀ controls on heavy duty trucks will reduce truck emissions significantly over the next 10 years.

The year 2021 was selected to determine the potential localized impacts from the Project's construction and operational emissions to the existing residences located to the west of the Project across Redlands Boulevard. These residences are the closest sensitive receptors outside of the project's boundaries. According to the conceptual construction schedule provided by the applicant, extensive building construction is expected to take place within the Project site along and to the east of Redlands Boulevard in 2021. The year 2021 also corresponds to the completion of approximated 88 percent of the Phase 1 operation (56 percent of the entire Project) and the attendant operational emissions.

The estimated maximum localized air quality impacts from the construction and operation of the Project in 2021 are summarized in Table 4.3.P for locations within the Project's boundaries (FEIR, Volume 3, pg. 4.3-84). These maximum impacts were found at the locations of the existing residences within the project boundaries of the Specific Plan. Table 4.3.Q (FEIR, Volume 3, pg. 4.3-87) summarizes the highest air quality impacts for sensitive receptors located outside of the boundary of the Specific Plan project boundaries. As noted from these two tables, Project construction impacts would exceed the significance thresholds for NO_x, PM₁₀, and PM_{2.5} for locations within the project boundaries and NO_x and PM₁₀ at receptors located outside the project boundaries and thus represents a significant impact without mitigation.

The Project's maximum combined impacts from construction and operations during 2027 are shown in Table 4.3.R (FEIR, Volume 3, pg. 4.3-88) for the existing sensitive receptors located within the Specific

Plan project boundaries along with the SCAQMD-recommended significance thresholds. Table 4.3.S (FEIR, Volume 3, pg. 4.3-89) shows the maximum combined impacts for sensitive receptors located outside of the Specific Plan project boundaries. These latter impacts were found within the residential areas located to the west east of the Project across Redlands Boulevard Gilman Springs Road. As shown in these tables, the Project would only exceed the SCAQMD's significance thresholds for PM₁₀ at locations within the project boundary.

Operational emissions during 2035 were estimated based on the Project's trip generation and Project-related travel along the local roadway network within and along the Project boundaries of the WLC Specific Plan. Table 4.3.T (FEIR, Volume 3, pg. 4.3-89) shows the maximum localized air quality impacts for 2035 relative to the background air quality levels in 2012 at the existing sensitive receptors located within the WLC Specific Plan project boundaries. Table 4.3.U (FEIR, Volume 3, pg. 4.3-92) identifies the highest localized impacts for sensitive receptors located outside of the Specific Plan project boundaries. These latter impacts were found within the residential areas located to the west of the Project across Redlands Boulevard. As shown in these tables Table 4.3.T, the concentrations of PM₁₀ exceed the SCAQMD's significance thresholds due principally to the inclusion of entrained road dust in the impact assessment and would, therefore, represent a significant impact without mitigation.

After application of mitigation, the Project would continue to exceed the localized significance thresholds at the existing residences located within the Project boundaries for PM₁₀ during the Project Phase 1 (2012) condition, PM₁₀ during the Project Phase 1 and Phase 2 Full Build Out (2012), PM₁₀ during the year 2021 when construction is projected to occur adjacent to the existing residence across Redlands Boulevard, PM₁₀ during the Year 2027 when Project's combined construction and operational emissions are highest for several pollutants, and PM₁₀ after the final Project build out in 2035.

d. Long-Term Operational Emissions

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project could potentially exceed applicable daily thresholds for operational activities.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant but will be reduced to the extent feasible through mitigation measures. The Council finds that **Mitigation Measures 4.3.6.3A through 4.3.6.3E, and 4.3.6.4A**, are incorporated into the MMRP for the Project, and will be implemented as specified therein. However, the Council finds that even with application of these mitigation measures, long term construction emissions-related air quality impacts are considered significant and unavoidable.

4.3.6.3A Prior to issuance of a Certificate of Occupancy, vehicles must be able to access the building using paved roads and parking lots.

4.3.6.3B The following shall be implemented as indicated:

Prior to Issuance of a Certificate of Occupancy

- a) Signs shall be prominently displayed informing truck drivers about the California Air Resources Board diesel idling regulations, and the prohibition of parking in residential areas.
- b) Signs shall be prominently displayed in all dock and delivery areas advising of the following: engines shall be turned off when not in use; trucks shall not idle for more than three consecutive minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report air quality violations.
- c) Signs shall be installed at each exit driveway providing directional information to the City's truck route. Text on the sign shall read "To Truck Route" with a directional arrow. Truck routes shall be clearly marked per the City Municipal Code.

On an Ongoing Basis

- d) Tenants shall maintain records on fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles are maintained pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.
- e) Tenant's staff in charge of keeping vehicle records shall be trained/certified in diesel technologies, by attending California Air Resources Board approved courses (such as the free, one-day Course #512). Documentation of said training shall be maintained on-site and be available for inspection by the City.
- f) Tenants shall be encouraged to become a SmartWay Partner.
- g) Tenants shall be encouraged to utilize SmartWay 1.0 or greater carriers.
- h) Tenants' fleets shall be in compliance with all current air quality regulations for on-road trucks including but not limited to California Air Resources Board's Heavy-Duty Greenhouse Gas Regulation and Truck and Bus Regulation.

- i) Information shall be posted in a prominent location available to truck drivers regarding alternative fueling technologies and the availability of such fuels in the immediate area of the World Logistics Center.
- j) Tenants shall be encouraged to apply for incentive funding (such as the Voucher Incentive Program [VIP], Carl Moyer, etc.) to upgrade their fleet.
- k) All yard trucks (yard dogs/yard goats/yard jockeys/yard hostlers) shall be powered by electricity, natural gas, propane, or an equivalent non-diesel fuel. Any off-road engines in the yard trucks shall have emissions standards equal to Tier 4 Interim or greater. Any on-road engines in the yard trucks shall have emissions standards that meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
- l) All diesel trucks entering logistics sites shall meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Facility operators shall maintain a log of all trucks entering the facility to document that the truck usage meets these emission standards. This log shall be available for inspection by City staff at any time.
- m) All standby emergency generators shall be fueled by natural gas, propane, or any non-diesel fuel.
- n) Truck and vehicle idling shall be limited to three (3) minutes.

4.3.6.3C Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area, a publically-accessible fueling station shall be operational within the Specific Plan area offering alternative fuels (natural gas, electricity, etc.) for purchase by the motoring public. Any fueling station shall be placed a minimum of 1000 feet from any off-site sensitive receptors or off-site zoned sensitive uses. This facility may be established in connection with the convenience store required in Mitigation Measure 4.3.6.3D.

4.3.6.3D Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area a site shall be operational within the Specific Plan area offering food and convenience items for purchase by the motoring public. This

facility may be established in connection with the fueling station required in Mitigation Measure 4.3.6.3C.

4.3.6.3E

Refrigerated warehouse space is prohibited unless it can be demonstrated that the environmental impacts resulting from the inclusion of refrigerated space and its associated facilities, including, but not limited to, refrigeration units in vehicles serving the logistics warehouse, do not exceed any environmental impact for the entire World Logistics Center identified in the program Environmental Impact Report. Such environmental analysis shall be provided with any warehouse plot plan application proposing refrigerated space. Any such proposal shall include electrical hookups at dock doors to provide power for vehicles equipped with Transportation Refrigeration Units (TRUs).

4.3.6.4A

The following measures shall be incorporated as conditions to any Plot Plan approval within the Specific Plan:

- a) All tenants shall be required to participate in Riverside County's Rideshare Program
- b) Storage lockers shall be provided in each building for a minimum of three percent of the full-time equivalent employees based on a ratio of 0.50 employees per 1,000 square feet of building area. Lockers shall be located in proximity to required bicycle storage facilities.
- c) Class II bike lanes shall be incorporated into the design for all project streets.
- d) The project shall incorporate pedestrian pathways between on-site uses.
- e) Site design and building placement shall provide pedestrian connections between internal and external facilities.
- f) The project shall provide pedestrian connections to residential uses within 0.25 mile from the project site.
- g) A minimum of two electric vehicle-charging stations for automobiles or light-duty trucks shall be provided at each building. In addition, parking facilities with 100 parking spaces or more shall be designed and constructed so that at least three percent of the total parking spaces are capable of supporting future electric vehicle supply equipment (EVSE) charging locations. Only sufficient sizing of conduit and service capacity to install Level 2 Electric Vehicle Supply Equipment (EVSE) or greater are required to be installed at the time of construction.

- h) Each building shall provide indoor and/or outdoor - bicycle storage space consistent with the City Municipal Code and the California Green Building Standards Code.- Each building shall provide a minimum of two shower and changing facilities for employees.
- i) Each building shall provide preferred and designated parking for any combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles equivalent to the number identified in California Green Building Standards Code Section 5.106.5.2 or the Moreno Valley Municipal Code whichever requires the higher number of carpool/vanpool stalls.
- j) The following information shall be provided to tenants: onsite electric vehicle charging locations and instructions, bicycle parking, shower facilities, transit availability and the schedules, telecommunicating benefits, alternative work schedule benefits, and energy efficiency.

Facts in Support of the Finding: Long-term air pollutant emission impacts that would result from the Project are those associated with stationary sources and mobile sources involving any Project-related change (e.g., emissions from the use of motor vehicles by Project-generated traffic). The FEIR, Volume 3, also analyzed the on-going agricultural operations in combination with construction activated and operational activities that will occur at the same time. Although implementation of **Mitigation Measures 4.3.6.3B through 4.3.6.3D, and 4.3.6.4A** may reduce vehicle trips associated with the Project, it is not possible to quantify the reduction in the amount of emissions that may occur. Considering the volume of emissions generated and current commuter habits, it is unlikely the implementation of vehicular management plans will result in a reduction of operational Project emissions to below existing SCAQMD thresholds. Application of Leadership in Energy and Environmental Design (LEED) standards and green building design principles could reduce emissions from building operations such as heating and cooling; however, such standards and principles would not reduce emissions of CO, ROG, NO_x, PM₁₀, and PM_{2.5} to below SCAQMD thresholds. No other feasible mitigation measures have been identified to reduce the operational emissions of CO, ROG, NO_x, PM₁₀, and PM_{2.5} to a less than significant level. Because the Project site is located in a nonattainment air basin for criteria pollutants, the addition of air pollutants resulting from operation of the Project would contribute to the continuation of nonattainment status in the Basin. In the absence of mitigation to reduce the Project's emission of contribution of ozone, PM₁₀, and PM_{2.5} to below SCAQMD thresholds, long-term air quality impacts resulting from the operation of the Project would remain significant and unavoidable. (FEIR, Volume 3, pgs. 4.3-94 to 4.3-102)

e. **Cumulative Air Quality Impacts**

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project could potentially result in a cumulatively considerable net increase of criteria pollutants for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant as there are no known feasible mitigation measures that could reduce this impact to a level of less than significant. Accordingly, Project-related impacts cumulative air quality impacts will remain significant and unavoidable.

Facts in Support of the Finding: As set forth in Section 4.3 of the FEIR, Volume 3, the Project would contribute criteria pollutants to the area during Project construction. A number of individual projects in the area may be under construction simultaneously with the Project. Depending on construction schedules and actual implementation of projects in the area, generation of fugitive dust and pollutant emissions during construction would result in substantial short-term increases in air pollutants. This would be a contribution to short-term cumulative air quality impacts.

The traffic study included vehicular trips from all present and future projects in the Project vicinity; therefore, the CO hot spot concentrations calculated at these intersections include the cumulative traffic effect. Based on this, no significant cumulative CO impacts would occur.

Long-term operation of the Project would exceed the standards for CO, ROC, NO_x, PM₁₀, and PM_{2.5}. The Basin is in nonattainment for PM₁₀ and ozone at the present time; therefore, the construction and operation of the Project would exacerbate nonattainment of air quality standards for PM₁₀ and ozone within the Basin and contribute to cumulative air quality impacts. Therefore, long-term cumulative air quality impacts are considered to be significant and unavoidable.

The Health Risk Assessment (HRA) conducted for the Project identified the increase in health risks to the nearby sensitive receptors from the Project's air pollutant emissions. This HRA identified that the Project's incremental increase is only a very small fraction of the ambient condition. Therefore, the concentration of diesel particulates at the Project site is below the established risk threshold. Individuals living and working in southern California may be exposed to levels of diesel emissions that are cumulatively significant; however, that circumstance is not created by the Project.

As noted from the results shown in Impact 4.3.6.5 in the subsection *Cancer Risks* (FEIR, Volume 3 Section 4.2 page 4.3-104 to 4.3-111), since the Project would implement mitigation measures resulting in the cleanest on-road and off-road diesel equipment and such equipment has been shown through extensive health effects studies to not result in cancer, the project would therefore not result in a cumulatively considerable impact. (FEIR, Volume 3, pgs. 4.3-111 to 4.3-112).

3. Land Use and Planning

a. Physically Divide an Established Community

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project would adversely affect existing rural residences on the Project site.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant as there is no effective mitigation available to protect or separate these existing residences from future warehousing buildings and operations. Accordingly, Project-related conflicts with existing rural residences will remain significant and unavoidable.

Facts in Support of the Finding: According to Section 4.10 of the FEIR, Volume 3, the adjacent properties surrounding the WLC Project are residential, light industrial, open space and undeveloped. Essentially, the Project site is located along the eastern urban boundary of the City of Moreno Valley with development only adjacent to the western boundary and northwest corner of the site. At present, there are seven rural residences on the Project site. These properties vary in size from 0.5 to 10 acres and are located on the east side of Redlands Boulevard and Theodore Street. These properties represent less than 1.5% of entire WLC Specific Plan area. The WLC Specific Plan designates these properties as “Light Logistics” and allows various logistics-related uses. It is believed these properties are currently occupied. It is possible that, as development of the Project site occurs according to the WLC Specific Plan, large warehouse buildings may eventually be located in close proximity to the existing residences. It would be ineffective and inefficient to try to incorporate these residences into the WLC Specific Plan land plan of large logistics warehouses to accommodate these residences. In addition, logistics operations would cause air pollutant, noise, lighting, and health risk impacts on residents living in these units if they were adjacent to operating warehouses.

The WLC Specific Plan currently shows a 250-foot buffer or setback along the western boundary of the site to separate existing residences from the proposed warehouse buildings. However, it would be ineffective and inefficient to try to incorporate similar buffers or setbacks, for the existing residences, into the WLC Specific Plan land plan. Under CEQA, the question is whether a project will affect the

environment or persons in general, not whether a project will affect particular persons. For instance, CEQA addresses how view sheds are impacted by a proposed project, but would not address the specific view that an individual resident sees. Therefore, the effect on the estimated 15 people (7 homes x 2.2 persons average occupancy) who live in the 7 houses does not constitute an impact and is insignificant. The council has erred on the side of caution treating the impact as if it were significant.

Installation of solid block walls around the warehouse buildings or the existing residence would help reduce noise and lighting impacts, but they would not help reduce air pollutant or health risk impacts. Therefore, there is no effective mitigation available to protect or separate these existing residences from future warehousing buildings and operations. (FEIR, Volume 3, pgs. 4.10-36).

4. Noise

a. On-Site Short-term Construction Impacts

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project would adversely affect residences located within 500 feet of a construction area would still be exposed to noise levels greater than 60 dBA (Leq).

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant as there is no effective mitigation available to protect existing residences within 500 feet of a construction area from significant noise levels. Accordingly, Project-related noise impacts during construction on existing rural residences will remain significant and unavoidable.

Facts in Support of the Finding: Construction within 1,580 feet of residential areas south of the freeway has the potential to exceed the daytime Moreno Valley Noise Ordinance criteria of 60 dBA (Leq). With implementation of **Mitigation Measure 4.12.6.1E**, any existing residences within 1,580 feet of a construction area would be shielded from construction noise with a 12-foot temporary sound barrier. A sound barrier will reduce the noise levels by about 10 dB resulting in a reduction of noise below City thresholds at residences 500 feet or further from the construction area. Although the installation of the temporary sound barrier would reduce noise levels experienced at the closest residences, those residences that are located within 500 feet of a construction area would still be exposed to noise levels greater than 60 dBA (Leq). Therefore, impacts associated with this issue would remain significant and unavoidable. (FEIR, Volume 3, pg. 4.12-36 to 4.12-39)

b. Off-Site Short-term Construction Impacts

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project would adversely affect off-site residences located adjacent to off-site construction projects would still be exposed to noise levels greater than 60 dBA (Leq).

Finding: Based on the entire record before us, this Council finds that the off-site construction impact is potentially significant as there is no effective mitigation available to protect existing residences adjacent to a construction area from significant noise levels. Accordingly, Project-related noise impacts during off-site construction on existing residences will remain significant and unavoidable.

Facts in Support of the Finding: With the implementation of **Mitigation Measure 4.12.6.1I**, off-site construction activities would be limited to daytime hours (6 am to 8 pm) during the weekdays only while **Mitigation Measure 4.12.6.1J** would require the installation of a temporary sound barrier. With these mitigation measures in place, residences adjacent to construction activities (depending on the loudness of the construction equipment) could experience noise levels greater than 60 dBA (Leq) for off-site construction projects lasting less than one month. These impacts would only occur during weekday daytime hours. However, even with implementation of these mitigation measures, noise levels experienced at these residences would be above the City's threshold. Therefore, impacts would remain significant and unavoidable. (FEIR, Volume 3, pg. 4.12-39)

c. Long-Term Traffic Noise Impacts

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project would result in noise levels at the closest residences within and adjacent to the WLC Specific Plan area exceeding the maximum noise level allowed under the City's Municipal Code.

Finding: Based on the entire record before us, this Council finds that the Project-related traffic noise impacts is potentially significant as there is no effective mitigation available to protect existing residences adjacent to roadways from significant noise levels. Even with implementation of **Mitigation Measures 4.12.6.2A** through **4.12.6.2D**, potential impacts due to long-term traffic noise impacts on existing residences will remain significant and unavoidable.

4.12.6.2A When processing future individual buildings under the World Logistics Center Specific Plan, as part of the City's approval process, the City shall require the Applicant to take the following three actions for each building prior to approval of discretionary permits for individual plot plans for the requested development:

Action 1: Perform a building-specific noise study to ensure that the assumptions set forth in the FEIR prepared for the programmatic level entitlement remain valid. These procedure used to conduct these noise analyses shall be consistent with the noise analysis conducted in the programmatic FEIR and shall be used to impose building-specific mitigation on the individually-proposed buildings.

Action 2: If the building-specific analyses identify that the proposed development triggers the need for mitigation from the proposed building, including all preceding developments in the specific plan area, the Applicant shall implement the mitigation identified in the WLC FEIR. Prior to implementing the mitigation, the Applicant shall send letters by registered mail to all property owners and non-owner occupants of properties that would benefit from the proposed mitigation asking them to provide a position either in favor of or in opposition to the proposed noise abatement mitigation within 45 days. Each property shall be entitled to one vote on behalf of owners and one vote per dwelling on behalf of non-owner occupants.

If more than 50% of the votes from responding benefited receptors oppose the abatement, the abatement will not be considered reasonable. Additionally, for noise abatement to be located on private property, 100% of owners of property upon which the abatement is to be placed must support the proposed abatement. In the case of proposed noise abatement on private property, no response from a property owner, after three attempts by registered mail, is considered a *no* vote.

At the completion of the vote at the end of the 45 day period, the Applicant shall provide the tentative results of the vote to all property owners by registered mail. During the next 15 calendar days following the date of the mailing, property owners may change their vote. Following the 15-day period, the results of the vote will be finalized and made public.

Action 3: Upon consent from benefited receptors and property owners, the Applicant shall post a bond for the cost of the construction of the necessary mitigation as estimated by the City Engineer to ensure completion of the mitigation. The certificate of occupancy permits shall be issued upon posting of the bond or demonstration that 50% of the votes from responding benefited receptors oppose the abatement or, if the abatement is located on private property, any property owners oppose the abatement (per Noise Study MM N-8, pg. 53).

- 4.12.6.2B** Prior to issuance/approval of any building permits, the centerline of Cactus Avenue Extension will be located no closer than 114 feet to the residential property lines along Merwin Street. An alternative is to locate the roadway closer to the residences and provide a soundwall along Cactus Avenue Extension. The soundwall location and height should be determined by a Registered Engineer, and the soundwall shall be designed to reduce noise levels to less than 65 CNEL at the residences. The Engineer shall provide calculations and supporting information in a report that will be required to be submitted to and approved by the City prior to issuing permits to construct the road (per Noise Study, pg.51, Cactus Avenue Extension, ID #50).
- 4.12.6.2C** Prior to the approval of any discretionary permits, cumulative impact areas shown in the WLC EIR Noise Study shall be included in the soundwall mitigation program outlined in Mitigation Measures 4.12.6.2A and 4.12.6.2D (per Noise Study MM N-9, pg. 62).
- 4.12.6.2D** Prior to issuance of a building permit, the applicant shall demonstrate that the development maintains a buffer with soundwall for noise attenuation at residential/warehousing interface (i.e., western and southwestern boundaries of the project site). To keep the noise levels at nearby residential areas less than typical ambient conditions, the warehousing property line shall be located a minimum of 250 feet from the residential zone boundary, and a 12-foot noise barrier shall be located along the perimeter of the property that faces any residential areas. The 12 foot noise barrier may be a soundwall, berm, or combination of the two. The height shall be measured relative to the pad of the warehouse. This requirement shall be implemented anytime residential areas are within 600 feet of the warehousing property line to insure that a noise level of 45 dBA (Leq) will not be exceeded at the residential zone. This requirement is consistent with Item 10 of Municipal Code Section 9.16.160 Business park/industrial that states, “All manufacturing and industrial uses adjacent to residential land uses shall include a buffer zone and/or noise attenuation wall to reduce outside noise levels” (per Noise Study MM N-10, pg. 62).

Facts in Support of the Finding: Areas within the WLC Specific Plan area, these include two groups of residences that may remain with the implementation of the Project. (FEIR, Volume 3, pgs. 4.12-49 to 4.12-54). Under CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons. For instance, CEQA addresses how view sheds are impacted by a proposed project, but would not address the specific view that an individual resident sees. Therefore, the effect on the estimated 15 people (7 homes x 2.2 persons average occupancy)

who live in the 7 houses does not constitute an impact and is insignificant. The council has erred on the side of caution treating the impact as if it were significant.

- *Theodore Street/Street A (Street B to Street F)*. There are two residences in this area. These residences are anticipated to experience noise increases up to 16 dB due to the implementation of the Specific Plan. As a result, existing noise levels at these two residences will be changed significantly. The exact alignment of the roadway is to be determined, but the homes may be roughly 100 feet from the centerline on the roadway. One residence fronts onto Street A (Theodore Street), and the driveway access would make a soundwall ineffective. The other residence is on to Street A. It is difficult to determine where an outdoor living area is for this residence. However, since it is a single residence, a soundwall would have a limited effectiveness. Since mitigation is not feasible, impacts remain significant and unavoidable. (FEIR, Volume 3, pg. 4.12-49)
- *Dracaea Avenue/Street F (east of Theodore Street)*. There is one residence in this area fronting onto the future alignment of Street F (currently Dracaea Avenue). Existing conditions identify low levels of traffic noise on Dracaea Avenue. The 65 CNEL contour is projected to lie 84 feet from the centerline of Street F and it is likely that the one residence would lie within this zone. With build out of the Project, noise levels would reach as high as 68.1 CNEL, which exceeds the City's 65 CNEL threshold. Installation of a soundwall would not be effective in reducing noise levels due to the opening for the driveway. Since mitigation is not feasible, impacts remain significant and unavoidable. (FEIR, Volume 3, pg. 4.12-54)

For the noise impact locations adjacent to the WLC Specific Plan area for which significant noise impacts have been identified, mitigation measures are not feasible or will not fully reduce the impact to less than significant levels. (FEIR, Volume 3, pgs. 4.12-49 to 4.12-50)

- *Gilman Springs Road (between Eucalyptus Avenue and Street C, and between Jack Rabbit Trail and Bridge Street)*. There are three single-family homes scattered along these roadway segments. All of the houses are set back from the roadway, but none has soundwalls. A significant noise increase is projected for at least one of these segments in three of the four case years. Homes that are widely separated from other homes cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.

- *Ironwood Avenue (between Redlands Boulevard and Highland Boulevard)*. There are two single-family homes that front onto Ironwood Avenue. There are also two churches along this roadway. A significant noise increase is projected for all four study years the 2012 time horizon. In 2035, the Project is projected to increase noise levels by 52.1 dB, bringing the noise level to 60.8 CNEL. Land uses that are widely separated from one another cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *Locust Avenue (between Moreno Beach Drive and Smiley Boulevard)*. There are three single-family homes along this roadway and they front onto the roadway. The 2035 time horizon results in a significant noise increase for this area. In 2035, the Project will increase noise levels by 1.5 dB, bringing the noise level to 66.9 CNEL. As discussed above, homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *Redlands Boulevard (Eucalyptus Avenue to State Route 60)*. There are scattered homes in this area that either face Redlands Boulevard (or Shubert Street) or are on Redlands Boulevard. The 2012 and 2035 time horizons result in a significant noise increase for this area. Homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *Redlands Boulevard (State Route 60 to San Timoteo Canyon Road)*. There are approximately 28 homes along this roadway that would be affected. The single-family homes are scattered and generally front the roadway. The 2012, 2022, and 2035 time horizons result in a significant noise increase for this area. The increases in noise are around 2 dB with a resultant noise level in the 70 to 71 CNEL range. Homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *San Timoteo Canyon Road (from Alessandro Road to Live Oak Canyon Road to Redlands Boulevard)*. There are approximately four scattered residences along this roadway that would be affected. The existing baseline plus Project time horizon results in a significant noise increase for this area. The noise increases by a little over 3.0 dB with resultant noise levels in the 65 to 66 CNEL range. Homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.

- *Theodore Street (State Route 60 to Highland Boulevard)*. The noise analysis indicates that the Project will cause a 1.2 dB increase in the year 2035 with a resulting noise level of 66.3 CNEL. There are four existing homes on Theodore Street that front onto the roadway. Homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.

5. Transportation

a. Off-Site Improvements to TUMF Facilities

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project would cause an increase in traffic relative to the existing traffic load and capacity of the street system.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant but will be reduced to the extent feasible through mitigation measures. The Council finds that **Mitigation Measure 4.15.7.4A** is incorporated into the MMRP for the Project, and will be implemented as specified therein. However, the Council finds that even with application of these mitigation measures, the City does not have direct control over TUMF funding the City cannot ensure that the identified improvements would be made are considered significant and unavoidable.

Facts in Support of the Finding: As indicated in Section 4.15 of the FEIR, Volume 3, there are improvements and changes to roads that are part of the TUMF Regional System of Highways and Arterials, some of which are under the jurisdiction of Moreno Valley and others of which are located in other jurisdictions. The developer shall be responsible for paying the TUMF fees in effect at the time of approval. These payments shall constitute the developer's mitigation of Project impacts to this category of roads. The City will work with the other member agencies of WRCOG to program TUMF funds to implement the mitigation measures identified in Table 4.15.AT through Table 4.15.AY (FEIR, Volume 3, pgs. 4.15-185 to 4.15-213) pertaining to TUMF facilities outside the jurisdiction of the City of Moreno Valley. To the extent that TUMF fees provided by the developer are used to implement the recommended improvements the Project's impacts would be less-than-significant. However, because the City does not have direct control over TUMF funding the City cannot ensure that the identified improvements would be made. Thus at this point the Project's impacts on these facilities must be considered significant and unavoidable. (FEIR, Volume 3, pgs. 4.15-239)

b. Off-Site Improvements to Roads Outside the Jurisdiction of the City and Not Part of the TUMF Program.

Significant Unavoidable Impact: The EIR evaluated and concluded that the Project would cause an increase in traffic relative to the existing traffic load and capacity of the street system.

Finding: Based on the entire record before us, this Council finds that this impact is potentially significant but will be reduced to the extent feasible through mitigation measures. The Council finds that **Mitigation Measure 4.15.7.4E** is incorporated into the MMRP for the Project, and will be implemented as specified therein. However, the Council finds that even with application of these mitigation measures, Project impacts to off-site roads outside the jurisdiction of the City and not part of the TUMF Program are considered significant and unavoidable.

Facts in Support of the Finding: At this time, the City does not have cooperative agreements with neighboring jurisdictions that would serve as a mechanism for collecting and distributing developer funds to cover the cost of cross-jurisdictions mitigation measures, other than the TUMF program. The City will work with the City of Redlands and Riverside County to collect fair share funds from the developer and to implement the signalization of the San Timoteo Road/Alessandro Road intersection and the San Timoteo Road/Live Oak Canyon intersection (respectively). The City will also work with the City of Riverside to collect a fair-share contribution from the developer to signalize the Martin Luther King Boulevard/I-215 northbound ramp intersection. To the extent that the City is able to establish such a mechanism and the other jurisdiction constructs the recommended improvement, the Project's impacts would be less-than-significant. However, because the City cannot guarantee that such a mechanism will be established and does not have direct control over facilities outside of its jurisdiction, the City cannot ensure that the identified improvements would be made. Thus, at this point the Project's impacts on these facilities must be considered significant and unavoidable.

Similarly, the City has not entered into an agreement with Caltrans for the collection of developer fair share payments for improvements to the state highway system other than freeway interchange improvements funded through the TUMF program. Nor has Caltrans established a program to collect fair-share contributions to freeway improvements such as those identified in Table 74 and Table 79 of the Traffic Impact Analysis FEIR, Volume 3, Appendix L. Instead, Caltrans has traditionally relied on other means to fund freeway improvements; means involving multiple stages of review and input from other agencies, with priorities and constraints applied at each stage, that preclude a direct connection between developer-provided fair-share funds and specific highway improvements.

The key feature of this system pertaining to the recommended freeway mitigation measures is that this system is outside the control of the City of Moreno Valley. The City will work with Caltrans to establish a mechanism for collecting fair share funds from developers for use in funding needed freeway improvements. However, since at the present time no such mechanism exists that would ensure that WLC funds contributed to Caltrans or any other state agency would be used to implement specific improvements that mitigate WLC impacts, and because there is no mechanism by which the City can construct or guarantee the construction of any improvements to the freeway system by itself, the Project's impacts on the state highway system must be considered significant and unavoidable. (FEIR, Volume 3, pgs. 4.15-239 to 4.15-240)

D. ADEQUACY OF THE RANGE OF PROJECT ALTERNATIVES

The EIR analyzed four alternatives to the Project as proposed, and evaluated these alternatives for their ability to meet the Project's objectives as described in Section II.B above. CEQA requires the evaluation of a "No Project Alternative" to assess the maximum net change in the environment as a result of implementation of the Project. The No Project Alternative, referred to as the No Project/No Build, assumes no ground-disturbing activities would take place, nor would any form of structure or facility be erected. No Project/Existing General Plan Alternative, a Reduced Density Alternative, and two Mixed Use Alternatives were also selected for analysis. CEQA requires the evaluation of alternatives that can reduce the significance of identified impacts and "feasibly attain most of the basic objectives of the Project." Thus, in order to develop a range of reasonable alternatives, the Project Objectives must be considered when this Council is evaluating the alternatives.

1. No Project/No Build Alternative

Description: Under the No Build Alternative, no development would take place within the project limits. No ground-disturbing activities would take place, nor would any form of structure or facility be erected. This alternative provides a baseline comparison to the Project. (FEIR, Volume 3, pg. 6-14 to 6-15)

Impacts: The No Project/No Build Alternative, as referenced in Section 6.0 of the FEIR, Volume 3, would not result in any new physical environmental effects.

Objectives: Under the No Project/No Build Alternative, the subject site would not be developed and all twelve of the Project Objectives would not be achieved.

Finding: Under the No Build Alternative, No ground-disturbing activities would take place, nor would any form of structure or facility be erected. This Alternative would not result in the same significant and unavoidable impacts associated with agricultural resources, air quality, and traffic that have been

identified within the FEIR, Volume 3 for the Project. In the absence of development, no impacts would occur and this alternative would be the environmentally superior alternative. However, prohibiting development of the site, as suggested by this alternative, would not fulfill any of the primary objectives of the Project. Retention of the project site in its current condition would not create a high cube logistics facility consisting of approximately 2,610 acres of high-cube warehouse uses and it would not expand employment opportunities within the City and surrounding area. This Alternative provides a baseline comparison to the Project. Because the No Build Alternative does not meet any the Project objectives, the City Council hereby rejects the No Build Alternative.

2. No Project/Existing General Plan Alternative

Description: Pursuant to CEQA (§15126.6[e][2]), the No Project Alternative should discuss what would reasonably be expected to occur, based on current plans and consistent with available infrastructure and community services, in the foreseeable future. It is reasonable in the event the Project were not approved that the site would be developed in accordance with the existing General Plan land uses in the future.

The No Project/Existing General Plan Alternative would result in development of the Project with the land uses currently shown in the City's General Plan. The City's General Plan currently designates the project area as a mix of residential, commercial, business park, and open space land uses in accordance with the Moreno Highlands Specific Plan (MHSP). The approved 2,038-acre MHSP (without the CDFW Conservation Buffer Area) is a master planned, mixed-use community, consisting of up to 4,051 residential dwelling units on approximately 1,435 acres and approximately 603 acres of business, retail, institutional, and other uses. The 1,084 acres owned by the CDFW are currently designated as Residential, Public Facilities, and Open Space in the City's General Plan. However, as it is owned by the CDFW, this area would not be developed and the property will not remain with these designations as part of this alternative, but it is unlikely that this area would be developed by the CDFW. (FEIR, Volume 3, pg. 6-15 to 6-16)

Impacts: Under the No Project/Existing General Plan Alternative, impacts related to short-term construction-related air quality would be similar to the Project as the same amount of land would be disturbed and the same mix of equipment would be utilized. Long-term operational-related air quality impacts would be reduced from that identified for the Project but would remain significant and unavoidable. Under this alternative, population and housing impacts would be greater in magnitude as residential uses are proposed. Similar to the Project, the associated increases in employment are accounted for in the City General Plan and other applicable local and regional plans.

The development of the No Project/Existing General Plan Alternative would have increased demands on public services and recreation facilities due to the residential component and population growth; however, the payment of fees, provision of onsite parkland and open space, higher property tax revenues, and adherence to development requirements would reduce these impacts to a less than significant level. Water supply availability is expected to be available although water demand is increased. Water demand was determined to be available for the Project. Because of the increase in vehicle trips achieved under this alternative, impacts to the operation of local roadways and intersections would be proportionally greater than what was identified for the Project; therefore, long-term traffic impacts would remain significant and unavoidable. Traffic-related noise would be greater in magnitude and noise impacts would be significant and unavoidable like the Project. (FEIR, Volume 3, pg. 6-16 to 6-22)

Objectives: The No Project/Existing General Plan Alternative would, to some degree, realize a few of the Project Objectives. Development of this Alternative would provide new employment opportunities for residents of Moreno Valley but not nearly to the degree as the Project. It would establish design standards and development guidelines to a consistent and attractive appearance throughout the entire project. This alternative would also encourage new development consistent with regional and municipal service capabilities and would provide appropriate transitions or setbacks between on-site and off-site uses. (FEIR, Volume 3, Table 6.K, pg. 6-22: Comparison of No Project/Existing General Plan Alternative to the Project Objectives)

The No Project/Existing General Plan Alternative would not meet the objectives of the Project because it would not provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan; it would not create a major logistics center; and it would not create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity. (FEIR, Volume 3, Table 6.K: Comparison of No Project/Existing General Plan Alternative to the Project Objectives, pg. 6-22)

Finding: Under the No Project/Existing General Plan Alternative, a mix of residential, commercial, business park, and open space land uses in accordance with the Moreno Highlands Specific Plan (MHSP) would be built. The City Council hereby finds that the No Project/Existing General Plan Alternative will not avoid or substantially reduce the significant and unavoidable construction and operational air quality impacts, and long-term traffic impacts and noise would remain significant and unavoidable identified in the EIR. This Alternative would not meet Project Objectives to the same extent as the Project. Furthermore, the scale of the Alternative would not maximize or realize the economic potential of the site. Based on the reduced scope of development, the No Project/Existing General Plan Alternative would

diminish capacities and capabilities to satisfy existing and projected unmet market demands within the trade area. The No Project/Existing General Plan Alternative would also result in comparatively fewer opportunities to provide jobs, as compared to the Project. Therefore, the City Council rejects the No Project/Existing General Plan Alternative on the basis that it fails to avoid or substantially reduce the significant and unavoidable impacts of the Project and does not meet the Project Objectives as well as the Project. The City Council also finds that each of these considerations constitutes a ground for rejecting this Alternative that is independently sufficient to support the City Council's rejection of this alternative.

3. **Alternative 1 - Reduced Density Alternative**

Description: As identified in Section 6.0 of the FEIR, Volume 3, the Reduced Density Alternative has been considered with the intent of avoiding or substantially reducing significant impacts, and in particular the significant impacts that cannot be reduced to a less than significant level through implementation of mitigation measures created by the Project's traffic, air quality, and noise impacts. This Alternative includes development of the project site with approximately 28 million square feet of logistics warehousing, including 74.3 acres for open space. The 1,084 acres owned by the CDFW would be designated as Open Space in the City's General Plan, similar to the Project. Under this alternative, the proposed logistics uses would represent a net decrease of approximately 31 percent (28 million square feet) as compared with the Project.

Because of the large area, approximately 2,610 acres, of the Project that is proposed for development, public facilities, or off-site improvements, a variety of reduced density alternatives could be considered that might substantially reduce or eliminate one or more of the significant and unavoidable impacts of the Project. For example, warehousing development on the site would have to be reduced to approximately one percent of the project site, or 400,000 square feet, of the WLC Project's proposed high-cube logistics warehouse building area in order to eliminate significant and unavoidable impacts associated with air quality in order to reduce air pollution emissions to less than applicable SCAQMD thresholds. The only way this could logically occur would be to develop a small portion of the site (i.e., less than one percent) and leave the rest of the site vacant. In addition, even this substantial reduction in the proposed high-cube logistics warehouse building area and/or developable area would not eliminate the Project's other significant and unavoidable impacts associated with aesthetics, air quality, noise, and transportation. Any of the viable alternatives that are examined in this EIR would entail some type of development on all or most of the project site, rather than development of an illogically small portion of the site (i.e., one percent). (FEIR, Volume 3, pg. 6-23 to 6-24)

Impacts: As identified in Section 6.0 of the FEIR, Volume 3, the Reduced Density Alternative would result in similar impacts for the following nine environmental issues: Aesthetics; Agriculture and Forestry Resources; Biological Resources; Cultural Resources; Geology and Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Recreation. Under the Reduced Density Alternative, development of the same high-cube logistics land uses, building heights and mass, but at a floor area level approximately 70 percent of the Project, would be constructed resulting in significant and unavoidable impacts associated with scenic vistas, local scenic roads, character of the site and surroundings, and on a cumulatively considerable basis in the same exact manner as the Project. Impacts related to short-term construction-related air quality would be the same as the Project, because the same amount of land would be disturbed and the same mix of equipment would be utilized. The Reduced Density Alternative would result in significant and unavoidable air quality impacts from CO, VOC, NO_x, and PM₁₀, emissions during project construction, in the same exact manner as the Project. Long-term operational-related air quality impacts would be incrementally reduced when compared to the Project, but the emissions cannot be mitigated to below SCAQMD thresholds and would remain significant and unavoidable in approximately the same manner as the Project. Similarly, impacts related to short-term construction-related noise cannot be mitigated to a less than significant level and would be significant and unavoidable in the exact same manner as the Project. Although traffic-related noise would be reduced when compared to the Project, impacts would have a similar effect on local roadway segments and would remain significant and unavoidable as there are no feasible mitigation measures that would be able to reduce impacts to a less than significant level, in approximately the same manner as the Project. Under this alternative, the volume of water required and the amount of wastewater and solid waste generated would be reduced in comparison to the Project and the decrease in the amount of logistics uses would result in a reduction of permanent jobs that would be created. Consequently, this Alternative would have incrementally reduced demand on public services, recreation, and water use. Similar to the Project, increased property tax revenues, the payment of fees, and adherence to City development and utility requirements would reduce these impacts to less than significant levels.

Because of the decrease in vehicle trips achieved under this alternative, impacts to the operation of local roadways and intersections would be proportionally reduced from those identified for the Project. However, under this Alternative, the future increases in traffic volumes would have a similar effect on freeways and interchanges, resulting in significant impacts similar to those identified for the Project. Since the City does not have control over when freeway improvements would occur, traffic impacts to freeways and interchanges would remain significant and unavoidable for impacts associated with freeway

segments in approximately the same manner as the Project, as the City does not have control of when such freeway improvements can be installed or constructed by Caltrans.

In summary, the Reduced Density Alternative would incrementally reduce almost all of the Project impacts by reducing the total square footage of development. However, all of the impacts identified as significant and unavoidable under the Project, including aesthetics, air quality, greenhouse gas emissions, noise, and traffic would still be significant and unavoidable under this alternative. (FEIR, Volume 3, pg. 6-24 to 6-29).

Objectives: Under this Alternative, some of the Project objectives are met, but not nearly to the same degree as the Project which includes creating substantial employment opportunities for the citizens; providing the land use designations and infrastructure plans necessary to meet current market demands and to support the City’s Economic Development Action Plan; creates a major logistics center with good regional and freeway access; provides a major logistics center to accommodate to some degree the ever-expanding volumes at the Ports of Los Angeles and Long Beach; creates a project that will provide a balanced approach to the City’s fiscal viability, economic expansion, and environmental integrity; provides the infrastructure improvements required to meet project needs in an efficient and cost-effective manner; encourages new development consistent with regional and municipal service capabilities; improves employment opportunities within the City to improve the City’s jobs/housing balance and help reduce systemic unemployment within the City; provides thousands of construction job opportunities during the Project’s buildout phase to improve the jobs/housing balance and help reduce systemic unemployment; and provide appropriate transitions or setbacks between on-site and off-site uses. (FEIR, Volume 3, Table 6.M: Comparison of Reduced Density Alternative to the Project Objectives, pg. 6-29)

Findings: Under the Reduced Density Alternative, development of the project site with approximately 28 million square feet of logistics warehousing, including 74.3 acres for open space would occur. This Alternative would have similar impacts that have been identified within the FEIR, Volume 3. However, the Reduced Density Alternative would result in a decrease in trip generation in comparison to the Project, and would result in a decrease in the severity of the significant and unavoidable impacts to construction and operational air pollution emissions, climate change and greenhouse gas emission, and traffic. The City Council finds that the Reduced Density Alternative would fulfill three of the twelve Project Objectives by establishing design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project; establishing a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings; and providing appropriate transitions or setbacks between on-site and off-site uses. Moreno Valley

residents would also have more opportunities for employment. Because the Reduced Density Alternative will not fulfill nine of the twelve objectives of the Project and the severity of significant and unavoidable impacts would be not be reduced, the Council hereby rejects the Reduced Density Alternative.

4. Alternative 2 - Mixed Use A

Description: As identified in Section 6.0 of the FEIR, Volume 3, with the intent of avoiding or substantially reducing significant impacts created by the Project's traffic, air quality, and noise impacts, the City considered Mixed Use A Alternative. This alternative includes development of the project site with approximately 1,410 acres of logistics warehousing (22 million square feet), 1,000 acres of light industrial uses (2,120 million square feet), 50 acres of retail commercial uses (500,000 square feet), 100 acres of professional or medical office uses (1.0 million square feet), and 150 acres of open space. The 1,085 acres owned by the CDFW would be designated as Open Space in the City's General Plan, similar to the Project. (FEIR, Volume 3, pg. 6-29 to 6-30)

Impacts: Section 6.0 of the FEIR, Volume 3, identifies nine environmental issues that would have similar impacts as the Project. These issues are: Aesthetics, Agricultural and Forestry Resources, Cultural Resources, Biological Resources, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, and Recreation. Under this alternative, impacts related to short-term construction-related air quality and noise impacts would remain significant and unavoidable, similar to the Project. Long-term air quality operational impacts under this alternative would be increased in magnitude, remain significant and unavoidable, and would result in similar conditions as identified for the Project. The Mixed Use A Alternative would decrease the amount of logistics warehousing and would add light industrial, commercial, and office uses that would generate more permanent and more varied jobs than the Project, but some uses may require skilled workers and it is not known if or to what degree these workers already reside in the City. In addition, the developer will be supporting a local employment center to help City residents find positions within the WLCSP before the positions are advertised on a regional basis. The office uses proposed under this alternative may incrementally increase the total number of people that would be added to the City's population and could have greater demands on public services and recreation. However, the increased property tax revenues, payment of fees, and dedication of parkland would reduce these impacts to a less than significant level. This alternative would increase the amount of wastewater generated, increase the amount of potable water required, and increase the amount of solid waste produced on site. Similar to the Project, adherence to utility requirements would reduce these impacts to less than significant levels. Because of the increase in vehicle trips resulting from this alternative, impacts to the operation of local roadways and intersections would be proportionally increased from the Project and remain significant and unavoidable.

Because of the increase in vehicle trips under this alternative, impacts to the operation of local roadways and intersections would be proportionally increased from what was identified for the Project. Long-term traffic impacts would remain significant and unavoidable for impacts associated with freeway segments as the City does not have control of when such freeway improvements would occur. Similarly, traffic-related noise would be increased in magnitude and cannot be mitigated to a less than significant level in a manner similar to the Project.

In summary, the Mixed Use A Alternative would increase employment opportunities but would substantially increase traffic, noise, and air quality impacts. All the impacts identified as significant under the Project, including air quality health risks, would still be significant under this alternative. (FEIR, Volume 3, pgs. 6-29 through 6-34)

Objectives: Under this alternative, nearly all of the Project objectives are met, with the exception of the following: creates a major logistics center with good regional and freeway access; provides a major logistics center to accommodate to some degree the ever-expanding volumes at the Ports of Los Angeles and Long Beach; creates a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity; and provides the infrastructure improvements required to meet project needs in an efficient and cost-effective manner; encourages new development consistent with regional and municipal service capabilities. (FEIR, Volume 3, Table 6.O: Comparison of the Mixed Use A Alternative to the Project Objectives, pg. 6-34)

Finding: Under the Mixed Use A Alternative, the project site would be developed with approximately 1,410 acres of logistics warehousing (22 million square feet), 1,000 acres of light industrial uses (2,120 million square feet), 50 acres of retail commercial uses (500,000 square feet), 100 acres of professional or medical office uses (1.0 million square feet), and 150 acres of open space. The Mixed Use A Alternative would increase employment opportunities but would substantially increase traffic, noise, and air quality impacts. All the impacts identified as significant under the Project, including air quality health risks, would still be significant under this alternative.

Most of the objectives of the Project would be met; however, the Mixed Use A Alternative would not meet the Project objectives of locating distribution services near transportation corridors and clustering such uses near the state highway system. The Council finds that the Mixed Use A Alternative would have similar impacts to all environmental issues. Because the Mixed Use A Alternative will not substantially reduce the environmental impact of the Project and it would not meet the Project objectives of locating distribution services near transportation corridors and clustering such uses near the state highway system, the Council hereby rejects the Mixed Use A Alternative.

5. Alternative 3 - Mixed Use B

Description: As identified in Section 6.0 of the FEIR, Volume 3, the Mixed Use B Alternative would develop the project site similar to the land use plan of the Moreno Highlands Specific Plan (MHSP) but with 10 million square feet of logistics warehousing on the 603 acres proposed for business, retail, institutional, and other uses under the MHSP. The 1,085 acres owned by the CDFW would be designated as Open Space in the City's General Plan, similar to the Project. (FEIR, Volume 3, pg. 6-34 to 6-35)

Impacts: Section 6.0 of the FEIR, Volume 3, Under Alternative 3, impacts related to short-term construction-related air quality would be similar to the Project as the same amount of land would be disturbed and the same mix of equipment would be utilized. Long-term operational-related air pollutant emissions would be higher than the Project and would remain significant and unavoidable, with the exception of PM_{2.5} and SO_x. Like the Project, long-term air quality relative to criteria pollutants would still be significant, with the exception of SO_x. Assuming the same level of mitigation as the proposed Project, there would be no cancer risks associated with this alternative since the use of new technology diesel engines do not contribute to cancer risk as described in Final EIR Volume 3 Section 4.3. The development of the Mixed Use B Alternative would have increased demands on public services and recreation facilities to serve future residential uses. However, increased property tax revenues, payment of development impact fees, and adherence to development requirements would reduce these impacts to a less than significant level. Water supply availability is expected to be available as water demand is expected to be the same. Water demand was determined to be available for the Project. There would be an increase in vehicle trips under this alternative, and impacts to the operation of local roadways and intersections would be similarly increased compared to that identified for the Project; therefore, long-term traffic impacts would remain significant and unavoidable. Development of the Mixed Use B Alternative would provide new employment opportunities and homes for residents of Moreno Valley, but new employment opportunities would be significantly reduced compared to the Project.

In summary, the Mixed Use B Alternative would incrementally increase traffic and not improve the City's jobs/housing balance over the long-term. However, this is the only alternative that would reduce a significant impact of the Project (aesthetics – views) by substantially reducing the amount of warehousing on the site and replacing it with residential uses. Views of the area would still transition from vacant agricultural land to suburban development, but it would have a residential appearance compared to the Project. All the other impacts identified as significant under the Project, including likely air quality health risks, would still be significant under this alternative. (FEIR, Volume 3, pgs. 6-34 through 6-38)

Objectives: Under this alternative, some of the Project objectives are met, with the exception of the following: provides the land use designation and infrastructure plans necessary to meet current market demands and to support the City’s Economic Development Action Plan; creates a major logistics with good regional and freeway access; establishes a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings; provides a major logistics center to accommodate to some degree the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach; creates a project that will provide a balanced approach to the City’s fiscal viability, economic expansion, and environmental integrity; provides the infrastructure improvements required to meet project needs in an efficient and cost-effective manner; encourages new development consistent with regional and municipal service capabilities; and provides thousands of construction job opportunities during the project’s buildout. (FEIR, Volume 3, Table 6.Q: Comparison of the Mixed Use B Alternative to the Project Objectives, pg. 6-38)

Finding: Under the Mixed Use B Alternative, development of the project site with approximately develop the project site similar to the land use plan of the Moreno Highlands Specific Plan (MHSP) but with 10 million square feet of logistics warehousing on the 603 acres proposed for business, retail, institutional, and other uses under the MHSP. The Mixed Use B Alternative would incrementally increase traffic and not improve the City’s jobs/housing balance over the long-term. However, this is the only alternative that would reduce a significant impact of the Project (aesthetics – views) by substantially reducing the amount of warehousing on the site and replacing it with residential uses. Views of the area would still transition from vacant agricultural land to suburban development, but it would have a residential appearance compared to the Project. All the other impacts identified as significant under the Project, including likely air quality health risks, would still be significant under this alternative. (FEIR, Volume 3, pgs. 6-37)

Some of the objectives of the Project would be met; however, the Project objectives of locating distribution services near transportation corridors and clustering such uses near the state highway system would not be met. The Council finds that the Mixed Use B Alternative would have similar impacts to all environmental issues except for aesthetic because this Alternative would eliminate the significant and unavoidable impacts to aesthetics. Because the Mixed Use B Alternative will not substantially reduce the environmental impact of the Project and it would not meet the Project objectives of locating major distribution services near transportation corridors and clustering such uses near the state highway system, provide land use designations and infrastructure plans necessary to meet current market demands and to support the City’s Economic Development Action Plan, and create a project that will provide a balanced

approach to the City's fiscal viability, economic expansion, and environmental integrity the Council hereby rejects the Mixed Use B Alternative.

6. Alternatives Considered and Rejected

A variety of additional alternatives were considered as part of the FEIR, Volume 3's Alternatives Analysis. (FEIR, Volume 3, pgs. 6-3 through 6-5) Two possible alternatives were considered and rejected because they could not accomplish the basic objectives of the Project or they were considered infeasible. Per the *CEQA Guidelines* (Section 15126.6(c)), factors that may be considered when addressing the feasibility of alternatives include failure to meet most of the stated Project objectives, infeasibility, or inability to avoid significant environmental effects. The purpose of the Project is to provide for and expand employment and revenue opportunities within the City of Moreno Valley. The Project would expand employment options in a location that is convenient to existing transportation corridors, convenient to existing and future City residents and would augment the City's economic base. The following provides and discussion of the three development scenarios that were considered and rejected as potential alternatives to implementation of the Project based on Section 15126.6 of the *CEQA Guidelines* because they did not feasibly attaining most of the basic objectives of the Project while reducing or avoiding any of the significant effects of the Project:

- **All Residential Alternative:** A number of residential uses, including very low density (2-acre or 5-acre lots) were considered prior to deciding on all warehousing uses, but it was concluded that any residential alternatives, or alternatives that emphasized residential uses, would further exacerbate the City's jobs/housing imbalance and did not meet any of the Project goals. In addition, the City's Economic Strategy Plan excludes additional residential development in this area. For these reasons, all Residential Use Alternatives were rejected for further analysis. However, an evaluation of the largely residential Moreno Highlands Specific Plan (MHSP) was provided under the No Project/Existing General Plan alternative. (FEIR, Volume 3, pg. 6-X)
- **Mixed Use Alternative:** The EIR examines two Mixed Use Alternatives with varying amounts of residential and non-residential uses. The No Project-Existing General Plan Alternative is based on the approved mixed use Moreno Highlands Specific Plan (MHSP). In addition, Alternative 3 (Mixed Use B) evaluates the impacts of substituting logistics warehouse uses for the non-residential uses currently included in the MHSP. After extensive evaluation, it was concluded that any reasonable combination of residential and non-residential uses (i.e., light industrial, business park, office, commercial) would result in impacts similar to those of the MHSP, Alternative 2 (mixed non-residential uses but no residential uses), or Alternative 3 (Moreno Highlands Specific

Plan with logistics warehousing as the main non-residential use). For this reason, no other Mixed Use Alternatives were considered further in this analysis. (FEIR, Volume 3, pg. 6-X)

- **Alternative Sites.** Section 6.0 of the FEIR, Volume 3 examines different sites in the surrounding region to determine if an alternative location would reduce or eliminate one or more significant impacts of the Project. This analysis must be based on feasible sites that could realistically support the Project (i.e., a contiguous 2,610-acre site for 40.6 million square feet of high-cube and light logistics warehouse uses as envisioned by the WLC Specific Plan). The surrounding jurisdictions, including Cities of Riverside, Perris, San Jacinto, Menifee, Calimesa, Banning, and Beaumont and the County of Riverside, along with Moreno Valley were contacted to identify potential alternative sites for the Project. FEIR, Volume 3, Figure 6.1 pg. 44 shows the locations of the various jurisdictions that were contacted and/or analyzed in this evaluation and FEIR, Volume 3, Table 6.R pg. 45 presents the results of that analysis. Table 6.R indicates that there are no feasible alternative sites in the surrounding or nearby jurisdictions that could support the Project (i.e., that have enough vacant land zoned or available for logistics warehousing with good freeway and/or rail access). For these reasons, Alternative Sites were not considered further in this analysis. (FEIR, Volume 3, pgs. 6-38 through 6-41.)

7. **Environmentally Superior Alternative**

As identified in the FEIR, Volume 3, the No Project/Existing General Plan Alternative has mixed impacts relative to the Project; it reduces aesthetic impacts to less than significant levels but worsens the jobs/housing ratio by introducing more housing than employment-generating uses. The Mixed Use A Alternative substantially increases traffic and related impacts compared to the Project impacts, but it does not create any additional significant impacts. The Mixed Use B Alternative would incrementally increase traffic and would not improve the jobs/housing balance. It would incrementally reduce health risks to existing residents along Redlands Boulevard (i.e., approximately 30 percent less warehousing), but could create health risks for new residents depending on the ultimate location of warehouses and new residences. In addition, this alternative would also worsen the jobs/housing ratio of the City by allowing the construction of many more homes than job-creating land uses. Regarding air quality impacts, development of any land uses would likely exceed SCAQMD thresholds mainly due to the size of the Project site. (FEIR, Volume 3, pg. 6-45 to 6-47)

The *CEQA Guidelines* (Section 15126.6 (e[2])) requires that an environmentally superior alternative be identified in the EIR. Based on the analysis in EIR Section 6 and the summary contained in DEIR Table 6.S, Alternative 1 – Reduced Density – is the only alternative that reduces traffic, air quality, and

related impacts by reducing the total square footage of warehousing by approximately 30 percent. Alternative 3—Mixed Use B—is the only alternative that would reduce a significant impact of the proposed project (i.e., aesthetics – views). However, it could create health risks for future residents of the project, and would worsen the jobs/housing balance of the City over the long term. For these reasons, the EIR concluded that Alternative 1 – Reduced Density — was environmentally superior to the proposed project.

DEIR Table 6.T compared Alternative 1 to the project objectives and determined Alternative 1 does not meet 9 of the 12 major goals of the proposed project mainly because reducing the total square footage by 30 percent also reduces the amount of new employment and property tax revenues. Therefore, Alternative 1 - Reduced Density, was rejected in favor of the proposed project.

E. GROWTH-INDUCING IMPACTS

CEQA requires a discussion of ways in which the Project could be growth inducing. Specifically, CEQA Guidelines Section 1512602(d) states that an EIR must describe the ways in which the Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

The Project area is largely vacant undeveloped land, although there are seven existing single-family homes in various locations on the WLC Project site along with associated ranch/farm buildings. The site has been farmed since the early 1900s and has supported dry (non-irrigated) farming, livestock grazing, and limited citrus groves. Much of the site continues to be used for dry farming.

The City's population has grown steadily over the past decades. Population projections developed by SCAG estimate the City's population will reach approximately 213,700 persons by the year 2020 and approximately 255,200 persons by the year 2035. The extent to which the new jobs created by a Project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a Project. Construction of the WLC Project will create short-term construction jobs. These short-term positions are anticipated to be filled by workers who, for the most part, reside in the Project area; therefore, construction of the WLC Project will not generate a permanent increase in population within the Project area. Development envisioned under the Specific Plan consists of approximately 40.6 million square feet of logistics warehouse and general warehouse facilities.

Development of the high-cube logistics warehouse and general warehouse facilities will create jobs in the local economy. It is estimated that the WLCSP Project would result in approximately 24,000 new job opportunities (20,307 on-site permanent jobs plus 3,693 direct/induced permanent jobs).

The new employment opportunities resulting from development of the proposed high-cube logistics warehouse and general warehouse uses will raise the City's current jobs-to-housing ratio by providing additional jobs to local residents. While the place of residence of the persons accepting employment provided by the proposed uses is uncertain, due to the City's projected jobs/housing ratio, it is reasonable to assume that a large percentage of these jobs would be filled by persons already living within the City or Project area. The Project does not include a residential component. The WLC Project is located within an area that is currently largely vacant and currently planned for a mix of residential, commercial, business park, and open space land uses in accordance with the General Plan Community Development Element. The WLC Project includes a General Plan Amendment to change the existing mix of land use designations to Logistics Development and Light Logistics. Therefore, no significant increase in population of the City would result from the development or operation of the WLC Project.

The *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California* (EIR Appendix O "Study," DTA 2014) estimates that approximately 7,386 indirect/induced jobs will be created in the County, of which 3,693 jobs are projected to be within the City as a result of Project implementation. While the specific location of the potential additional indirect/induced jobs created within the County cannot be specifically determined, it is reasonable to assume that a large percentage of these jobs will be support service jobs and are likely to be located in the WLC Project vicinity, and therefore the City. As detailed in the Study, total recurring revenues available to the City are estimated at approximately \$11,257,466 per year. The greatest percentage of revenue is attributed to the Property Tax In-Lieu of Vehicle License Fee (40.2%), followed by Secured Property Tax (29.1%), and Business Receipts Tax and Licenses (10.8%). Total recurring costs to the City are estimated at approximately \$5,557,674 per year. The greatest percentage of cost is attributed to the Police Services (35.8%), followed by Infrastructure and Parks Maintenance Costs (34.1%), and Fire Services (13.3%).

Project recurring annual fiscal surplus that would be available to the City is estimated at approximately 7 million which is equal two times the Project annual City General Fund costs.

The Project proposes to eliminate the potential for 7,700 units of residential housing planned under the Moreno Highlands Specific Plan, although this anticipated change is already included in the City's current Housing Element which has been certified by California Housing and Community Development. This change would incrementally reduce the population and housing growth potential for this property from that projected in the current SCAG regional growth forecast. However, the Project would add 40.6 million square feet of logistics warehouse space in the eastern portion of the City. Since the City currently has a jobs-to-housing ratio substantially lower than the region (i.e., SCAG region), it is

likely that much of the employment that would be generated by this Project can be accommodated by the existing workforce in the City and surrounding area. In that way, the Project is growth-inducing in terms of employment. Due to relatively high vacancy rates in the City, it is also likely that the housing needs of new employees that do not already live in the City (i.e., own or rent) could largely be accommodated by the City's existing housing stock. Therefore, the WLC Project would only produce modest (i.e., not significant) growth inducement within Moreno Valley.

As previously noted, the specific location of the additional indirect jobs created within the County cannot be specifically determined; however, it is likely that a large some percentage of these jobs will be support service jobs and are likely to be located in the Project vicinity. The Study assumes that one-half of these indirect jobs will be located within the City. The Study indicates that the creation of new jobs to the City will lead to more consumer spending by employees in existing retail establishments within the City, as well as new retail development that will be attracted to the City as a result of this spending. Job creation also results in increased tax revenues to the City through increased property taxes and sales taxes associated with development of the WLC Project. However, it is important to note that because of the difference in timing of the development of the various phases of the WLC Project, the number of employees summarized above will not be realized at the same time.

Development of the WLC Project is projected to create approximately 16,521 construction-related jobs within the City. Similar to recurring employment (i.e., permanent), it is likely that a large percentage of these jobs will be located in the general vicinity of the WLC Project and therefore within the City.

The WLC Project does not include a residential component; therefore, the jobs generated by the WLC Project would not need to support new households as a result of direct employment or indirect employment. Based on the potential increase in jobs (additional 20,307 direct jobs) within the City and no substantial increase in population as a result of the project, the City's jobs-to-housing ratio would improve from the existing (2011) ratio of 0.47 to 0.91, thus achieving a greater jobs-to-housing balance within the City. As development of the WLC Project is expected to occur over the course of many years, the jobs-to-housing ratio will not be significantly changed immediately. The City's current jobs-to-housing ratio is exceptionally low when compared to SCAG standards; therefore, the need for employment is immediate. A balance between jobs and housing within the City would have a positive impact by decreasing costs associated with commuting, traffic congestion, air pollution, and improves the standard of living. It also provides savings and a better quality of life to consumers in the operation and

maintenance of automobiles, lessening commute times and saving to local public agencies in terms of the need to construct and maintain new road improvements.

Streets, water and sewer utilities, and municipal services would be extended to serve the WLC Project. The WLC Project will benefit other development projects in the project area, and therefore, could potentially induce additional business and job growth by removing an impediment to growth, such as a lack of basic infrastructure or services. However, the WLC Project is located proximate to other existing warehouse, commercial, and residential uses. Therefore, the Project will necessitate extension of major infrastructure; however, the project will not result in substantial population growth that has not already been planned for in the City's General Plan. As discussed in Section V.9.c and in the Statement of Overriding Considerations in Section VI, the adoption of the WLCSP and the proposed use for the project site would further the overall goals of the General Plan, and because the improvements necessary for development of the site would not facilitate growth that has not been anticipated in the project area, no significant growth-inducing effect would occur, and no mitigation is required. (Section 5.0 of the FEIR, Volume 3, pgs. 5-4 through 5-6)

F. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(c) of the CEQA Guidelines mandates that the EIR must address any significant irreversible environmental changes which would be involved in the proposed action should it be implemented. An impact would fall into this category if it resulted in any of the following:

1. The project would involve a large commitment of non-renewable resources;
2. The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
3. The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and/or
4. The project will consume large amounts of energy that are produced from non-renewable fossil fuels, although the WLC Specific Plan indicates the proposed uses will efficiently consume energy and water resources.

Determining whether the WLC Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that

there would be little possibility of restoring them. The project site is generally marginal agricultural land; however, as identified within the City's General Plan, the City anticipates the eventual conversion of agricultural uses to urban uses and the WLC Project would permanently alter the site by converting predominantly agricultural uses to urban warehousing. This is a significant irreversible environmental change that would occur as a result of project implementation. Because no significant mineral resources were identified within the project limits, no significant impacts related to this issue would result from development of the project site. Natural resources in the form of construction materials would be utilized in the construction of the WLC Project and energy resources in the form of electricity and natural gas would be used during the long-term operation of the project; however, their use is not expected to result in a negative impact related to the availability of these resources. Existing scenic vistas were identified as being visible from the project limits. Implementation of the WLC Project would result in the obstruction of views of the Badlands, Mt. Russell and Mystic Lake/San Jacinto Wildlife Preserve from the nearest sensitive visual receptors and those traveling along roadways in the project vicinity. This is a significant and irreversible environmental change that would occur as a result of project implementation. Cumulatively, future development along SR-60 would also result in the obstruction of the existing views of surrounding mountains and visual features.

In addition, this logistics warehouse project, in concert with the other built or approved industrial warehouse projects to the north and west, will fundamentally change the character and land use pattern of this portion of the City. Many of the Project-specific impacts are addressed, as outlined above, but the land use change represented by this and other industrial projects represents a substantial irreversible change in community character for this area. (FEIR, Volume 3 pgs. 5-4).

VI. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to Section 15093 of the CEQA Guidelines, the City Council must balance the benefits of the proposed Project against unavoidable environmental risks in determining whether to approve the proposed Project, and, CEQA Guidelines Section 15093(b) provides that when a public agency approves a project that will result in significant impacts that are identified in the Final EIR but are not avoided or substantially lessened, the agency must state in writing the specific reasons to support its decision based on the Final EIR and/or other information in the whole administrative record. If the specific economic, legal, social, technological or other benefits of a proposed project outweigh its unavoidable adverse environmental impacts, the adverse effects may be considered "acceptable."

As set forth in sections V.A and V.B above, many of the World Logistics Center's impacts on the environment will either be insignificant or, through the imposition of mitigation measures as conditions of approval of the Project, can be reduced to less than significant.

Some impacts of The World Logistics Center will remain significant and unavoidable even after the imposition of all feasible mitigation measures which include impacts to aesthetics, air quality, including associated health risks, land use, noise, transportation and circulation. There are no feasible alternatives to the Project which would mitigate or avoid those environmental impacts as indicated in section V.D above.

In consideration of the above and as set forth below, the Council has determined that the benefits which will accrue from the development of the Project outweigh the significant and unavoidable impacts which the Project will produce.

Finding: Notwithstanding the significant unavoidable impacts to aesthetics (individually and cumulative), air quality (individually and cumulative), land use and planning, noise, and transportation discussed in subsection V.C above, the development of otherwise underused land, the creation of jobs by the Project, both during construction and after the Project is in operation, the multiplier effect which will create secondary jobs to support the Project and those who work in it, the substantial economic benefits which will be generated, directly and indirectly, by the Project, the reduction in commute times and the reduction of trips on the County's highways during peak morning and evening hours in the peak travel direction, the reduction of water consumption over currently planned uses, the achievement of the City's goal of attracting new business opportunities, the improvement of the City's jobs/housing balance and the generation of revenues which will go into the City's general fund constitute benefits which outweigh the unavoidable adverse environmental impacts to aesthetics, agricultural resources, air quality, land use, noise and transportation and circulation. Each of the benefits, individually, constitutes a sufficient basis for approving the Project notwithstanding the significant and unavoidable impact on aesthetics, agricultural resources, air quality, land use, noise and transportation and circulation which will result.

Factual Basis for the Finding:

Approval of the Project Will Create Jobs and Increase Economic Activity. At full build out, the Project is estimated to generate over 20,000 ongoing direct jobs in the City, and an additional approximately 7,400 indirect and induced jobs, approximately 3,700 of these indirect and induced jobs will be in the City. (Appendix O, Table 4B.) In constant 2012 dollars, these jobs will result

in estimated annual wages of approximately \$830,000,000 for direct jobs and approximately \$300,000,000 in wages resulting from indirect and induced jobs. Of the estimated \$300,000,000 indirect and induced jobs approximately \$150,000,000 in wages will occur within the City. (Appendix O, Table 4B.). This translates into an overall annual estimated economic output of approximately \$2,370,000,000, approximately \$1,940,000,000 of which will occur within the City (Appendix O, Table 4C.). The Project also is estimated to generate in aggregate, almost 13,000 direct construction jobs over the 15 year build out period, equivalent to approximately 850 full-time equivalent jobs every year for the duration of the 15-year construction period. These jobs will result in estimated wages, in constant 2012 dollars, of approximately \$625,000,000. (Appendix O, Table 4D.) Added to this will be approximately 7,400 estimated indirect and induced jobs, with approximately 3,700 of them within the City, with wages, in constant 2012 dollars, of approximately \$300,000,000 half of which, approximately \$150,000,000 will be for jobs within the City. (Appendix O, Table 4D.) Construction is estimated to result in approximately \$2,600,000,000 in total economic output, which includes in wages and sales income of which approximately \$2,140,000,000 will occur within the City. (Appendix O, Table 4D.)

Approval of the Project Will Increase the City's Tax Revenues and Generate a Substantial Annual tax Surplus. At full build out, the Project is estimated to generate approximately \$11,300,000 in annual revenues (in constant 2012 dollars) for the City (Appendix O, Table 3A) with approximately \$5,500,000 in costs (Appendix O, Table 3B) resulting in an estimated annual surplus of almost \$5,700,000. (Appendix O, Table 3C.) In addition, the City will receive an estimated additional \$1,800,000 in Moreno Valley Fire property taxes over the cost of the fire protection services which will be provided to the Project, money that can be spent on fire services in other parts of the City (Appendix O, page 18).

Approval of the Project Will Provide Money for Schools. The Project is estimated to provide approximately \$20,300,000 in school impact mitigation fees (calculated based on a total 40,600,000 sq. ft. times the 2014 Moreno Valley School District and San Jacinto Unified School District's respective development fees) that can be used to improve educational opportunities for students within both the Moreno Valley Unified School District and the San Jacinto Unified School District. (Final EIR, Table 4.14.D.) The Project is estimated to also generate approximately \$22,000,000 in additional State education revenue annually as a result of the 1% ad valorem property taxes assessed against the developed Project property. Finally, the Project will also benefit education as a result of income taxes paid to the State on jobs created by the Project, which will be used to fund elementary and high schools, both locally and throughout the State. (Education Code § 14002.)

Approval of the Project Will Improve the City's Jobs/Housing Balance. As shown in Section 4.13.1.3 of the Final EIR, the City's current jobs/housing balance of 0.47 is one of the lowest in Southern California and is almost 60% below the Southern California Association of Government's 1.14 average, resulting in long commutes for many of the City's residents. At full build out, the jobs within the City associated with the Project, direct, indirect and induced, are projected to increase the jobs/housing balance to 0.91 (Appendix O, Table 4F).

Approval of the Project Will Further the State of California's Goals of Improving the Urban Jobs/Housing Balance. California Government Code 65890.1 declares the following:

- State land use patterns should be encouraged that balance the location of employment-generating uses with residential uses so that employment-related commuting is minimized.
- Balance in employment and residential land use patterns reduces traffic congestion and may contribute to improvement of air quality in urban areas.
- Balancing of employment-generating land uses and residential land uses improves economic and housing opportunities and reduces loss of economic productivity caused by transportation delay.
- The attainment of a more balanced land use pattern requires the cooperation of government agencies with the private sector to assure that public and private decisions affecting land use take into consideration the need to seek balance in the location of employment-generating land uses and residential land uses.
- Local agencies and state agencies should cooperate to facilitate the balancing of employment-generating land uses and residential land uses and provisions of transportation to serve these uses.
- Local governments have the primary responsibility to plan for local land use patterns, within the parameters established by state law to achieve statewide needs.
- It is the intent of the Legislature to move toward the goal that every California worker have available the opportunity to reside close to his or her jobsite.

By creating an estimated 20,000 direct jobs and more indirect and induced jobs in Moreno Valley, the Project improves the City's jobs/housing balance and helps the City meet this State-mandated goal.

Approval of the Project Will Further the General Plan's Goal to Create an Orderly and Balanced Land Use Pattern that Accommodates a Range of Residential, Cultural, Recreational, Business and Employment Opportunities (Goal 9.1, I). The Project adds a major jobs-rich, high-demand land use which is projected to provide a substantial number of both construction and permanent job opportunities to significantly improve the City's low jobs-housing balance and establish a long-term stable tax base to fund City services. The Project includes a Specific Plan which incorporates extensive project design standards and project review processes to ensure that all project development occurs in an orderly and balanced manner.

Approval of the Project Will Further the General Plan's Goal of Creating Clean, Attractive Conditions, Free of Blight and Deteriorated Conditions (Goal 9.1, II). The Project will convert more than 2,600 acres of unused, unproductive marginal farmland into a comprehensively designed logistics campus incorporating project-wide guidelines for site planning, architecture, and landscaping. The WLC project will advance many of the City's General Plan goals, objectives and policies. This Project will replace the 20-year old Moreno Highlands Specific Plan which proved to be unmarketable. The Project includes a Specific Plan which requires compliance with these guidelines for all development within the WLC, all of which will be subject to a discretionary plan review process including provisions for public review.

Approval of the Project Will Further the General Plan's Goal of Creating a Community that Enjoys a Healthy Economic Climate that Benefits Both Residents and Businesses (Goal 9.1, IV). The Project will create substantial long-term economic growth and stability for the City as a whole through the creation of tens of thousands of short-term and long-term employment opportunities, increased property values, substantial on-going revenue sources from property taxes and retail sales, low cost of municipal services for logistics uses and payment of substantial development fees. Based on the projections from three separate economic analyses contained in the EIR, the Project will provide substantial annual tax surpluses that will generate funds for use by the City to address city-wide needs.

Approval of the Project Will Further the General Plan's Goal of Creating Recreational Amenities, Recreational Services and Open Space, Including but not Limited to Parks, Multi-Use Trails, Community Centers and Open Space (Goal 9.1, V). The Project includes the offer of dedication of 74.3 acres of significant open space in the Mt. Russell area. This area is immediately adjacent to the State of California's 8,800-acre Lake Perris State Recreation Area and the 9,000-acre San Jacinto Wildlife

Area. The 74.3 acres will be offered for dedication to the state and to the City for open space use. In addition, the WLC Specific Plan includes the provision for more than five miles of new mixed-use trails to be developed through the Project extending the existing trail system to provide public access opportunities to the Lake Perris Recreation Area and the San Jacinto Wildlife Area.

Approval of the Project Will Further the General Plan’s Goal to Create a Pattern of Land Uses Which Organizes Future Growth, Minimizes Conflicts Between Land Uses and Which Promotes the Rational Utilization of Presently Underdeveloped and Undeveloped Parcels (Goal 2.1). The Project will develop a major undeveloped section of the City into a self-contained, master-planned logistics park featuring major buffer areas between the Project and adjacent land uses. Development of the Project will occur in an organized rational manner subject to the review and approval by the City of all development proposals.

Approval of the Project Will Further the General Plan’s Goal to Create an Organized, Well-Designed, High Quality, and Functional Balance of Urban and Rural Land Uses that Will Meet the Needs of a Diverse Population and Promote the Optimum Degree of Health, Safety, Well-being and Beauty for All Areas of the Community While Maintaining a Sound Economic Base (Goal 2.2). The Project will convert more than 2,600 acres of unused, unproductive marginal farmland into a comprehensively designed logistics campus incorporating project-wide guidelines for site planning, architecture, and landscaping. The WLC project will advance many of the City’s General Plan goals, objectives and policies. This Project will replace the 20-year old Moreno Highlands Specific Plan west of Gilman Springs Road which proved to be unmarketable. The Project is projected to create thousands of job opportunities in the City of Moreno Valley within a master-planned logistics campus that will feature unified building design concepts, on-site and off-site landscaping, architecture, street design and a project-wide drainage and water quality system that emphasizes the creation of a sustainable business environment, a safe working environment for thousands of employees, in an attractive comfortable setting while creating a source of major economic benefits and stability to the City and its residents.

Approval of the Project Will Further the General Plan’s Goal of Achieving an Overall Design Statement that Will Establish a Visually Unique Image Throughout the City (Goal 2.3). The Project will be subject to extensive design guidelines which guide all elements of the development of the Project including grading, streets, buildings, lighting, landscaping, architecture, screening, parking, and signage all focused on creating a unified, aesthetically pleasing, functional design across the entire project area. The Project’s proximity to SR60 and Gilman Springs Road will provide a comprehensively

planned, architecturally-significant entry statement for the City. Every element of the Project will be subject to City review and approval to ensure that all applicable standards and these City goals are met.

Approval of the Project Will Further the General Plan’s Goal of Providing Systems for Water Supply and Distribution; Wastewater Collection, Treatment and Disposal; and Energy Distribution Which are Capable of Meeting the Present and Future Needs of All Residential, Commercial and Industrial Customers Within the City of Moreno Valley (Goal 2.5). The Project will provide necessary infrastructure systems to accommodate the future water, wastewater and utility needs of all users within the WLC. Such infrastructure systems will be constructed to keep pace with demand and will be monitored by the City and the Eastern Municipal Water District in connection with the review of each individual building application. Infrastructure improvements will be required to be operational at such time as buildings are occupied.

Approval of the Project Will Further the General Plan’s Goal of Balancing the Provision of Urban and Rural Lands Within Moreno Valley by Providing Adequate Land for Present and Future Urban and Economic Development Needs, While Retaining the Significant Natural Features and the Rural Character and Lifestyle of the Northeastern Portion of the Community (Objective 2.1). The Project will establish a major center of jobs-rich land uses to provide thousands of job opportunities for residents of the City and the region and will generate substantial long-term tax revenues to the City, the County and the State to assist in the funding of public services throughout the region. The development of the Project will be accomplished without impact on the rural character and lifestyle of the northeastern portion of the community. The SR60 corridor will provide a significant visual and functional separation between the WLC project and the northeastern portion of the community.

Approval of the Project Will Further the General Plan’s Goal of Providing a Mix of Industrial Uses Which Will Provide a Sound and Diversified Economic Base and Ample Employment Opportunities for the Citizens of Moreno Valley with the Establishment of Industrial Activities that Have Good Access to the Regional Transportation System, Accommodate the Personal Needs of Workers and Business Visitors; and which Meets the Service Needs of Local Businesses (Objective 2.5). The Project will provide a large-scale, master-planned logistics center specifically designed for the unique goods movement needs of the national and international business community relating to access, circulation, security and technology, all in an attractive, secure and sustainable environment. The project will create thousands of job opportunities for the citizens of Moreno Valley and the region and will provide a substantial long-term source of tax revenues to help provide a stable and diversified economic base for the City. The circulation plan for the Project is oriented toward

the SR60 freeway and to Gilman Springs Road so that traffic, particularly truck traffic, can move to and from the freeway system without interacting with drivers from residential areas in the vicinity. Heavy trucks are prohibited on streets adjacent to residential areas in the vicinity.

Approval of the Project Will Further the General Plan’s Goal of Designating Business Park/Industrial Areas to Provide for Manufacturing, Research and Development, Warehousing and Distribution as Well as Office and Support Commercial Activities (Policy 2.5.1). The Project will create a 2,600-acre master-planned logistics park which can provide up to 40,600,000 square feet of logistics uses (warehouse and distribution) and ancillary office uses. Development of the project will create thousands of job opportunities responding to the strong demand of the logistics industry and adding to the depth and variety of employment opportunities in the City. Development of the Project will provide a substantial long-term revenue benefits to the City allowing for the funding of City services across a broader and more stable economic base.

Approval of the Project Will Further the General Plan’s Goal of Locating Industrial Uses to Avoid Adverse Impacts on Surrounding Land Uses (Policy 2.5.2). The Project site is located at the most easterly end of the City and is buffered by SR60 on the north, Gilman Springs Road and the Badlands on the east, and the permanent open space of the San Jacinto Wildlife Area on the south. The Project includes several design features specifically to address the interface with the residential areas to the west of the Project. An extensive landscaped buffer runs the full length of the Project along Redlands Boulevard, Bay Avenue and Merwin Street. This buffer includes an earthen berm and a landscape design oriented to the adjacent residential neighborhoods. Special building height restrictions are applicable to the Project along its western edge to reduce the visibility of WLC buildings from the properties to the west. Other design features include: substantial development buffers along all edges of the Project, extensive landscape treatments within these buffers, a circulation system designed to direct trucks toward the freeways and away from residential areas, revisions to city-enforced Truck Routes to prohibit large trucks in residential areas, lighting restrictions, noise restrictions, building height limitations and architectural and landscape guidelines. These design features will be implemented by the City in connection with its review and approval of all development proposals within the WLC area.

Approval of the Project Will Further the General Plan’s Goal of Screening Manufacturing and Industrial Uses When Necessary to Reduce Glare, Noise, Dust, Vibrations and Unsightly Views (Policy 2.5.3) The Project provides extensive design guidelines in the Specific Plan to provide appropriate screening of WLC uses. The Specific Plan contains provisions for extensive landscape buffers around the WLC project, including an earthen berm along the western project edge. In addition,

guidelines addressing building height limitations, on-site and off-site landscape requirements, equipment screening, light shielding and noise restrictions are contained in the Specific Plan. Implementation of these design features will ensure that adjacent properties are not adversely affected by the development of the WLC project. The City will implement these guidelines in connection with its Plot Plan review of all development proposals in the WLC as required in the Specific Plan.

Approval of the Project Will Further the General Plan’s Goal of Designing Industrial Developments to Discourage Access Through Residential Areas (Policy 2.5.4). The Project provides for a circulation system that directs traffic toward the freeways and away from local residential areas. The circulation plan provides no vehicular access to Redlands Blvd. between the existing intersections with Eucalyptus Ave. on the north and Cactus Ave. on the south. The City’s Truck Routes will be amended such that heavy truck traffic will be prohibited on Redlands Blvd. south of Eucalyptus Ave. and on Cactus Ave. west of the WLC project.

Approval of the Project Will Further the General Plan’s Goal of Encouraging Open Space Preservation through Policies that Recognize Valuable Natural Resources and Areas Required for Protection of Public Safety that Exist in the City (Objective 2.7). The Project includes the redesignation of more than 1,000 acres of land to Open Space to reflect its present use as part of the San Jacinto Wildlife Area. In addition, 74.3 acres of land on the slopes of Mt. Russell will be offered for dedication to the State of California or to the City of Moreno Valley as permanent open space

Approval of the Project Will Further the General Plan’s Goal of Supporting and Encouraging the Annexation of Unincorporated Areas within the General Plan Study Area for which: a) Long-term Benefits Will be Derived by the City, b) Adequate Infrastructure and Services Have Been or Can Be Economically Provided in Accordance with Current City Standards, and c) the Proposed Annexation Will Generate Sufficient Revenues to Adequately Pay for the Provision of City Services Within a Reasonable Period of Time (Policy 2.9.1) The Project includes the annexation of an 85-acre parcel at the intersection of Gilman Springs Road and Alessandro Blvd., the development of which is incorporated into the WLC Specific Plan. The site’s location west of Gilman Springs Road makes its inclusion in the Specific Plan both practical and logical from a Project design perspective as well as for the delivery of public services.

Approval of the Project Will Further the General Plan’s Goal of Ensuring that All Development within the City of Moreno Valley Is of High Quality, Yields a Pleasant Living and Working Environment for Existing and Future Residents and Attracts Business as the Result of

Consistent Exemplary Design (Objective 2.10). The Project establishes extensive design guidelines in the Specific Plan and establishes project review procedures by the City to ensure that all development is of high quality, compatible design, and incorporates features to enhance its environmental sustainability. The City will conduct a discretionary review of all development proposals to ensure that the overall WLC and each project within it will result in a pleasant environment for employees and visitors. Through the provisions of the Specific Plan, the Project will have a consistent design theme (Policy 2.10.1), will contain regulations regarding screening of outdoor storage and trash facilities (Policy 2.10.2), will require architecturally attractive building elevations (Policy 2.10.3), will require landscaping as an integral part of the project design (Policy 2.10.4), requires a landscape buffer along the freeway right-of-way (Policy 2.10.5), will require a comprehensive sign program for the entire Project area (Policy 2.10.6), provides regulations for the control of on-site lighting (Policy 2.10.7 and 8), provides design standards for fences and walls (Policy 2.10.9), provides design standards for street frontages (Policy 2.10.10), provides design features (buffers, berms, landscaping, height restrictions, etc.) to screen and buffer the Project from residential properties (Policy 2.10.11), provides screening requirements for on-site parking areas (Policy 2.10.12) and requires compliance with the Municipal Code for landscaping in parking areas (Policy 2.10.13).

Approval of the Project Will Further the General Plan’s Goal of Maintaining a Water System Capable of Meeting Daily and Peak Demands of Moreno Valley Residents and Businesses Including the Provision of Adequate Fire Flows (Objective 2.11). The Project will be designed to minimize water consumption to the greatest degree possible. In addition to incorporating water-saving design features in all buildings, the Project will feature a landscape design that will minimize the use of mechanical irrigation to the greatest degree possible. The Project is required to confirm the availability of infrastructure to provide adequate water service (including fire flows) to serve development prior to the occupancy of each building in the WLC. Improvement plans will be reviewed and approved by the City and by Eastern Municipal Water District for all development within the WLC.

Approval of the Project Will Further the General Plan’s Goal of Maintaining a Wastewater Collection, Treatment and Disposal System Capable of Meeting the Daily and Peak Demands of Moreno Valley Residents and Businesses (Objective 2.12). The Project’s commitment to reducing water consumption throughout the project will significantly reduce the amount of wastewater that will be generated. The Project is required to confirm the availability of infrastructure to provide adequate wastewater services to serve development prior to the occupancy of each building in the WLC. Improvement plans will be reviewed and approved by the City and by Eastern Municipal Water District for all development within the Project.

Approval of the Project Will Further the General Plan’s Goal of Coordinating Development Activity With the Provision of Public Infrastructure and Services (Objective 2.13). The Project is subject to state-mandated subdivision procedures as well as discretionary project review procedures both carried out by the City prior to the development of any property within the Project area. These procedures establish the nature and extent of infrastructure improvements needed to serve any proposed development project. All development plans will be reviewed and approved by the service provider and such development will be limited to that which can be adequately served (Policy 2.13.1). Backbone facilities shall be constructed with the initial phases of the development served (Policy 2.13.2). Such improvements are required to be operational prior to the occupancy of any new buildings (Policy 2.13.3). The Project will include advanced technology infrastructure, including high-speed internet access and solar energy. (Policy 2.13.4).

Approval of the Project Will Further the General Plan’s Goal of Developing a System of Trails Which Contribute to Environmental Quality and Energy Conservation by Providing Alternatives to Motorized Vehicular Travel and Opportunities for Recreational Equestrian Riding, Bicycle Riding and Hiking and that Connects With Major Regional Trail Systems (Objective 4.3). The Project includes the extension of the City’s multi-use trail system with five miles of trails to be constructed within the WLC. These trails will provide linkages between the residential area west of the Project to the Lake Perris Recreation Area and the San Jacinto Wildlife Area to the south of the Project and to the Badlands area east of the Project. The trails will extend along Eucalyptus Ave. providing a nearby linkage to the future trails on the north side of SR60 (Policy 4.3.1). In addition, a public Trail Head will be constructed along Alessandro Boulevard (Policy 4.3.5). All such multi-use trails will be constructed along with adjacent development (Policy 4.3.3).

Approval of the Project Will Further the General Plan’s Goal of a Safe, Efficient, Environmentally and Fiscally Sound Integrated Vehicular Circulation System which Provides Access to Development and Supports Mobility Requirements of the System’s Users (Goal 5.1) The Project incorporates a circulation systems that fully meets the needs of the WLC project through the provision of enhanced freeway interchanges, new and expanded arterial highways, and collector streets within the WLC (Objective 5.1). The design of this system of roadways will be evaluated with each proposed building to ensure that adequate access and circulation is provided for planned vehicles (autos and trucks) as well as emergency vehicles, trash trucks, pedestrians and bicycles (Policy 5.1.1). Class II bikeways will be constructed on all streets in the WLC to reduce conflicts between vehicular, pedestrian and bicycle traffic (Policy 5.1.2). Off-street parking is required to meet Municipal Code requirements (Policy 5.1.3) and additional truck pull-out parking bays along collector streets will be installed to offer

additional truck parking without obstructing traffic flow. The circulation system is designed to preclude project truck traffic from traveling through residential areas by interrupting through traffic on Alessandro Blvd. and by not designating Redlands Blvd. south of Eucalyptus Ave. and Cactus Avenue west of the WLC project as Truck Routes.

Approval of the Project Will Further the General Plan’s Goal of Maintaining Level Of Service (LOS) “D” in the Vicinity of SR60 and High Employment Centers (Objective 5.3). The Project has been designed to meet the LOS “D” standard throughout the Project and each building project will be required to prepare and process a focused traffic impact analysis to confirm that this standard is met. Road improvements to maintain this standard will be constructed prior to occupancy of each building (Policy 5.3.1). Other traffic improvements will be funded through the collection of DIF and TUMF fees in connection with the construction of each building (Policy 5.3.5). Mitigation Measures imposed on the development of the Project will ensure that surrounding streets will not be exposed to additional traffic or traffic delays.

Approval of the Project Will Further the General Plan’s Goal of Maximizing the Efficiency of the Local Circulation System (Objective 5.5). The Project’s circulation system includes a system of roadways to provide safe and efficient access to all development parcels within the WLC. Each individual project will be reviewed and approved by the City to ensure that roadway spacing is appropriate (Policy 5.5.1), turn lanes are provided where necessary (Policy 5.5.2) and points of access are coordinated to ensure adequate capacity, efficiency and safety (Policy 5.5.3 and 5.5.4).

Approval of the Project Will Further the General Plan’s Goal of Encouraging Development of an Efficient Public Transportation System for the Entire Community (Objective 5.8). The Project has been designed to accommodate public transit vehicles on all Project streets, including future bus turnouts and bus shelters at such time as bus routes are established to serve the WLC (Policy 5.8.4).

Approval of the Project Will Further the General Plan’s Goal of Encouraging Development of Safe, Efficient and Aesthetic Pedestrian Facilities (Objective 5.9). The Project includes a system of pedestrian walkways that will link all Project sites to one another as well as to transit facilities, trails, bikeways, and off-Project locations (Policies 5.9.1 and .2). Such pedestrian walks will be designed into adjacent Project plans to enhance the aesthetics of the pedestrian experience while encouraging non-vehicular transportation. (Policies 5.9.3 and .4).

Approval of the Project Will Further the General Plan’s Goal of Encouraging Bicycling as an Alternative to Single Occupant Vehicle Travel for the Purpose of Reducing Fuel Consumption,

Traffic Congestion and Air Pollution (Objective 5.10). The Project provides a comprehensive network of bikeways along all Project streets to link all project sites as well as links to off-Project bicycle facilities and circulation facilities (Policy 5.10.1). Plot Plans for each building will ensure that facilities are incorporated (storage lockers, showers, etc.) to encourage the use of bicycles.

Approval of the Project Will Make Major Progress Toward Fulfilling Goals of the Moreno Valley Economic Development Action Plan. The Moreno Valley Economic Development Action Plan, approved by the City Council, first as a two-year plan in April, 2011, and again as a three-year plan in April, 2013, specifically identified logistics development in eastern Moreno Valley as a primary economic opportunity for the City. The logistics industry has been a leader in job creation in the Inland Empire and is expected to remain a strong business sector for the region (Inland Empire Quarterly Economic Report, January, 2014). Accordingly, the Project will create jobs well-suited for the local population in a community with an unemployment rate of 9.7% (April, 2014), which is well above the State average of 7.3% (April, 2014). (City Manager’s Report, pages 13-14 (June, 2014).

Approval of the Project Will Provide Quality Jobs. As set forth in Appendix O, Section 4.I.A.2, development of the Project is projected to create over 20,000 jobs with an estimated average annual income of \$40,926 (David Taussig & Associates, Fiscal and Economic Impact Study, 2014). This average income, taken from the U.S. Census Bureau for Riverside County and the Inland Empire, is slightly higher than the \$40,124 average income of current Moreno Valley residents according to the U.S. Bureau of Labor Statistics. These numbers represent average incomes in 2012, the latest date on which the information is available.

Approval of the Project Will Create Jobs in the Industry Where Demand Exists. For twenty years, the Moreno Highlands Specific Plan allowed for the development of a mix of residential, commercial, and small business park uses. However, due to a lack of demand, the uses allowed by the Specific Plan were never realized. Throughout Moreno Valley, there remains undeveloped residentially and commercially zoned property that sits underutilized due to a lack of demand resulting in a lack of job creation. Recognition of the lack of job creation was one of the driving elements of the City’s Economic Development Action Plan (April, 2011 and April, 2013), which sought to increase investment in the City and create job opportunities within the City. The Economic Development Action Plan identified healthcare and the logistics industries as the two major areas of economic opportunity for the City, where job creation is directly linked to market demand. The City has lost job creation opportunities due to the mismatch between zoning and market demand for those land uses. By selectively

aligning some of the City's land uses with market demands, the City will create job opportunities within the City that would not be achievable based on current zoning and market demand.

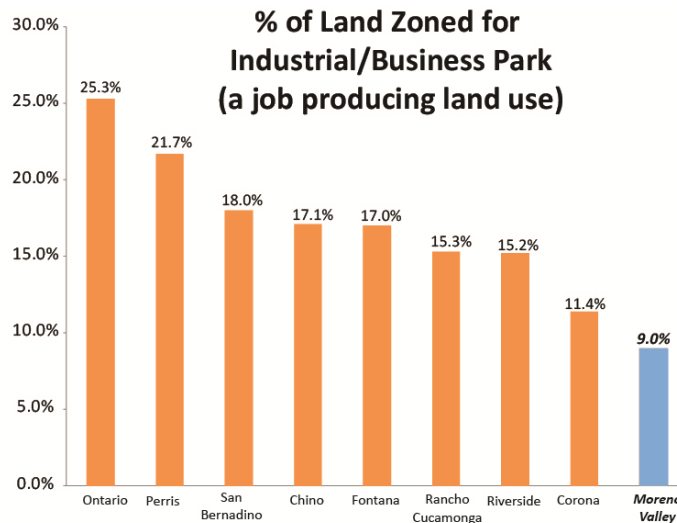
Approval of the Project Will Increase Employment, Furthering the City's Goal of Improving Quality of Life and Creating a Healthy Economic Climate by Reducing Poverty and Its Impacts. The Project will create jobs improving the economic vitality of the City and help reduce its 10.7% unemployment rate as of August 2014, according to the City Manager's October, 2014, Update. Increased employment in the City is one of many actions that will raise the quality of life and help improve the economic environment for the 1 in 6 residents, including 1 in 4 children, that live below the poverty line. By approving the Project, thereby creating an estimated 20,000 jobs, the City will help reduce poverty and its resulting impacts, which will result in an improved quality of life and economic climate (Ultimate General Plan Goals II and IV).

Approval of the Project Will Improve Public Health. One method of improving public health in Moreno Valley is to improve economic opportunities in the City because poverty is strongly correlated with many negative outcomes, particularly health. Public health research groups like the Robert Wood Johnson Foundation find that socioeconomic difficulties, not environmental issues, are the principal causes of public health risks (<http://www.dailynews.com/opinion/20131025/californias-poor-kept-in-poverty-by-job-killing-elite-john-husing>). And according to "IS POVERTY A DEATH SENTENCE? The Human Cost of Socioeconomic Disparities" by Senator Bernie Sanders (<http://www.sanders.senate.gov/>), almost as many people die from poverty as from lung cancer. Therefore, one of the best ways to improve public health in Moreno Valley is to increase the number of employment opportunities in the City. By approving the Project, thereby creating an estimated 20,000 direct jobs, the City will help reduce poverty and its resulting public health impacts.

Approval of the Project Will Allow for the Economic Use of Currently Underused Land. As set forth in Appendices C-1 and C-4 of the Final EIR, the Project site is currently suitable only for dry farming as the high cost and uncertain availability of irrigation water make irrigated farming economically infeasible. Further, as stated in section 3.3.1 of the Final EIR, there are numerous uses permitted by the current zoning on the site (the Moreno Highlands Specific Plan), but, because there has been no market for the planned and permitted uses, the Project site has remained undeveloped for over 20 years. As set forth in the Project Objectives in Section 3.6 of the Final EIR and in the Fiscal and Economic Impact Study dated May 21, 2014 (Appendix O to the Final EIR), the approval of the Project will allow the conversion of vacant, marginally productive agricultural land into a jobs- and revenue-producing facility.

Approval of the Project Will Ensure the Availability of Industrially-Zoned Land in Moreno Valley to Meet Demand. With the exception of the project site, the City of Moreno Valley has less than 150 acres, remaining for industrial development that does not already have an application for development pending. Over 14 million square feet of industrial development has been constructed in Moreno Valley with only one building currently vacant (City of Moreno Valley Economic Development Summary, July 10, 2014). As noted, inclusive of the 14 million square feet of industrial buildings already developed in the city, the City will still suffer from a substantial deficit of jobs compared to housing and the remaining 150 acres of industrial land in the City is insufficient to create the jobs needed to reduce poverty in the City and to meet the City’s employment goals set forth in the Economic Development Action Plan. Land for logistics development is in high demand and is one of the fastest growing sectors in the Inland Empire (Inland Empire Quarterly Economic Report, January, 2014). Without additional industrially zoned land, the City will not be able to meet the regional demand for logistics facilities which the city has identified as a prime area of economic opportunity in the City. Approval of the Project will provide more than 2,400 acres of land for logistics use, responding to the demand for those uses.

Approval of the Project Will Allow Moreno Valley to be More Competitive for Industrial Projects. Moreno Valley substantially lags other cities in the Inland Empire in the percentage of land zoned for industrial/business park uses (see chart below):



City of Moreno Valley’s Economic Development Action Plan, Survey of Inland Region - Industrial/Business Park Zoning (April, 2011)

With hardly any other available land remaining in the City for industrial development, the City cannot effectively compete and gain its fair share of industry in the region. With an insufficient amount of industrially zoned land, Moreno Valley is unable to attract the jobs necessary to provide economic opportunities for its residents.

Approval of the Project Will Make Major Progress Toward Fulfilling the Regional Need for Logistics Development. The Southern California Association of Governments, of which the City is a member, came to the following conclusions in its June, 2010, report, Industrial Space in Southern California: Future Supply and Demand for Warehousing and Intermodal Facilities, at pages ES-1-2:

“According to assumed growth rates, the region will run out of suitably zoned vacant land in about the year 2028. At that time, forecasts show that the demand for warehousing space will be approximately 1,023 million square feet.

“During the year 2035, there will be a projected shortfall of space of about 228 million square feet, unless other land not currently zoned for warehousing becomes available.”

The Project will be developed over the time period that the region needs additional appropriately zoned land for warehousing and intermodal facilities. As a result, the Project will help meet the forecasted demand for such facilities and will allow the City to be well placed to reap the benefits from serving the demand for logistics services.

Approval of the Project Will Implement Aggressive Air Quality Strategies. The Project will implement the most stringent air quality requirements. All trucks serving the facility will be required to meet U.S. Environmental Protection Agency’s (USEPA) and California Air Resources Board’s (CARB) most stringent engine emissions standards (2010 standards) that apply to new heavy-duty vehicles (Mitigation Measure 4.3.6.2A). By prohibiting trucks that do not meet 2010 emissions standards, the Project will exceed the operational requirements of USEPA and CARB and other agencies. In addition, the Project will 1) construct an alternative fueling station to encourage the use of alternatively-fueled vehicles (Mitigation Measure 4.3.6.3C), 2) prohibit the use of diesel in onsite facility equipment (Mitigation Measure 4.3.6.3B), 3) restrict idling (Mitigation Measure 4.3.6.3B), and 4) prohibit the use of diesel backup generators (Mitigation Measure 4.3.6.3B).

Approval of the Project Will Ensure that the Health of Residents, School Children and Workers, both Within and Outside of the Project Area, Will Not Be Adversely Affected by the Construction and Operation of the Project. The development of a logistics facility necessarily involves

the use of large numbers of diesel trucks. Numerous studies have found that the exhaust from the older diesel trucks can cause cancer and other adverse health effects. As set forth in EIR Section 4.3, the recent study conducted by the Health Effects Institute demonstrates that diesel trucks which comply with stringent USEPA and CARB 2010 standards do not cause cancer or adverse health effects. Project conditions of approval prohibit diesel trucks which do not comply with the 2010 standards from accessing the Project. As a result, the city will enjoy the numerous benefits which will flow from the construction and operation of the project without subjecting anyone to the risk of cancer and other adverse health effects which result from the use of older diesel trucks.

Approval of the Project Will Reduce Commuting Time and Decrease Traffic on the County's Highways during Peak Hours. As shown in Section 4.15.3.2 of the Final EIR, the jobs created by the Project will result in shorter commutes for the City's residents, shorter commutes for those who do not reside in the City but who have been forced to seek jobs closer to Los Angeles and will allow workers from outside of the City to travel to and from the Project on the County's freeways in the off peak directions which will reduce commute times. (Appendix L, section 4.D.)

Approval of the Project Will Result in Substantially Fewer Vehicle Trips Compared to Current Zoning. The traffic study for the Moreno Highlands Specific Plan (current zoning) forecasted a total of 178,608 average vehicle trips per day (ADT) resulting from the development of the Moreno Highlands plan. Deducing the land in the Moreno Highlands plan purchased by the California Department of Fish and Wildlife, San Diego Gas and Electric Company and Southern California Gas Company, none of which will be developed further, reduces the Average Daily Trips to 119,668. (FEIR, Volume 3, Table 6.G.) The development of the Moreno Highlands plan (current zoning) would result in more than a 70% increase in Average Daily Trips as compared to the development of the World Logistics Center project (69,542 ADT). (FEIR, Volume 3, Table 6.G.) It is important to note that the approved Moreno Highlands traffic studies did not provide separate counts for car and truck traffic and did not provide a forecast in terms of passenger care equivalents (PCEs) therefore the Average Daily Trips for the Moreno Highlands plan may understate total traffic as compared to the World Logistics Center Average Daily Trips. However, even if the Moreno Highlands plan were to generate no truck trips at all (only passenger car trips), it would still generate substantially more PCE trips than the proposed Project.

Approval of the Project Will Result in the Consumption of Substantially Less Water Compared to Current Zoning. When compared to the currently approved Moreno Highland Specific Plan, there will be a 64% decrease in projected water demand, 1,761,260 gallons per day, compared to 4,888,456 gallons per day after accounting for the land within the Specific Plan area which will never be

developed. (Final EIR, Table 6.I.) As a result, the Project's water usage consumption will be substantially below that anticipated in the City's General Plan and the 2010 Eastern Municipal Water District's Urban Water Management Plan. (FEIR, Volume 3, pg. 4.16-20.).

Approval of the Project Will Create a Master-Planned, Sustainable Development.

The development of the Project will be governed by the World Logistics Center Specific Plan which will result in a master-planned industrial development that will create a jobs center in eastern Moreno Valley that is separated from residential communities. By governing the development of the Project through the use of the Specific Plan, the City has ensured that all development at the Project site will meet the highest environmental standards while limiting impacts on the community. The Project achieves these standards through requirements such as LEED certification for buildings, minimal irrigation landscaping, solar power which ensures sustainable design and the smallest environmental footprint. In addition, the use of a master-planned development ensures that the Project will meet the highest aesthetic standards, creating a world-class facility, subject to rigorous design standards.

VII. CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT

The Moreno Valley City Council declares that it has reviewed and considered the FEIR in evaluating the Project and that the FEIR reflects the independent judgment of the City Council and finds that the FEIR is an accurate and objective statement that fully complies with CEQA and the CEQA Guidelines. The City Council further finds that no new significant information as defined by CEQA Guidelines Section 15088.5, has been received by the City Council after the circulation of both the DEIR and the FEIR that would require recirculation. All of the information added to the FEIR merely clarifies, amplifies or makes insignificant modifications to an already adequate DEIR pursuant to CEQA Guidelines Section 15088.5(b).

The City Council hereby certifies the EIR based on the following findings and conclusions:

A. FINDINGS

1. CEQA Compliance

As the decision-making body for the Project, the City Council has reviewed and considered the information contained in the Findings and supporting documentation. The City Council determines that the Findings contain a complete and accurate reporting of the environmental impacts and mitigation measures associated with the Project, as well as complete and accurate reporting of the unavoidable impacts and benefits of the Project as detailed in the Statement of Overriding Considerations.

The City Council finds that the EIR was prepared in compliance with CEQA and that the City Council has complied with CEQA's procedural and substantive requirements.

2. Significant Unavoidable Impacts/Statement of Overriding Considerations

The Project will have significant adverse impacts even following adoption of all feasible mitigation measures which are required by the City Council. The following significant environmental impacts have been identified in the FEIR and will require mitigation but cannot be mitigated to a level of insignificance as set forth in Section V(C) of these Findings:

- Aesthetics - Scenic Vistas
- Aesthetics - Scenic Resources and Scenic Highways
- Aesthetics - Substantial degradation of the existing visual character or quality of the site and its surroundings
- Aesthetics - Cumulative Aesthetic Impacts
- Air Quality - Construction Air Pollutant Emissions
- Air Quality - Operational Air Pollutant Emissions
- Air Quality - Consistency with Air Quality Management Plan (AQMP)
- Air Quality - Cumulative Air Pollutant Emissions
- Air Quality - Sensitive Receptors
- Land Use and Planning - Physically divide an established neighborhood (impacts on existing residences)
- Noise - Short-Term Construction Noise
- Noise - Long-Term Traffic Noise
- Noise - Cumulative Noise Levels
- Transportation - Off-Site Impacts to TUMF Facilities
- Transportation - Off-Site Improvements to Roads Outside the Jurisdiction of the City and Not Part of the TUMF Program

The City Council has eliminated or substantially reduced environmental impacts where feasible as described in the Findings, and the City Council determines that the remaining

unavoidable significant adverse impacts are acceptable due to the reasons set forth in the preceding Statement of Overriding Considerations.

3. Conclusions

- a. All potentially significant environmental impacts from implementation of the Project have been identified in the EIR and, with the implementation of the mitigation measures defined herein and set forth in the MMRP, will be mitigated to a less-than-significant level, except for the impacts identified in Section VII.A.2 above.
- b. Other reasonable alternatives to the Project that could feasibly achieve the basic objectives of the Project have been considered and rejected in favor of the Project.
- c. Environmental, economic, social and other considerations and benefits derived from the development of the Project override and make infeasible any alternatives to the Project or further mitigation measures beyond those incorporated into the Project.

VIII. ADOPTION OF MITIGATION MONITORING AND REPORTING PROGRAM

Pursuant to *Public Resources Code* Section 21081.6, the City Council hereby adopts, as conditions of approval of the Project, the Mitigation Monitoring and Reporting Plan (MMRP) set forth in the FEIR. In the event of any inconsistencies between the mitigation measures as set forth herein and the MMRP, the MMRP shall control, except to the extent that a mitigation measure contained herein is inadvertently omitted from the MMRP, in which case such mitigation measure shall be deemed as if it were included in the MMRP.

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
4.1 Aesthetics						
4.1.6.1A Each Plot Plan application for development along the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing or planned residential zoned uses) shall include a minimum 250-foot setback measured from the City/County zoning boundary line and any building or truck parking/access area within the project. The setback area shall include landscaping, berms, and walls to provide visual screening between the new development and existing residential areas upon maturity of the landscaping materials. The existing olive trees along Redlands Blvd. shall remain in place as long as practical to help screen views of the project site. This measure shall be implemented to the satisfaction of the Planning Official.	City Planning Division	Once before permitting	Prior to Plot Plan Approval	Plot Plan Review		Withhold Building Permits
		Once before permitting	Prior to issuance of Building permit.	Building Permit		Withhold Plot Plan Approval
		Once before issuance of certificate of occupancy.	Prior to issuance of certificate of occupancy.	On-site inspection		Withhold Certificate of Occupancy
4.1.6.1B Each Plot Plan application for development adjacent to Redlands Boulevard, Bay Avenue, or Merwin Street, shall include a plot plan, landscaping plan, and visual rendering(s) illustrating the appearance of the proposed development. The renderings shall demonstrate that views of proposed buildings and trucks can be reasonably screened from view from existing residents upon maturity of planned landscaping and to ensure consistency with the General Plan Objective 7.7. "Effective" screening shall mean that no more than the upper quarter (25%) of a building is visible from existing residences, which shall be achieved through a combination of landscaping, berms, fencing, etc. The location and number of view presentations shall be at the discretion of the Planning Division.	City Planning Division	Once before permitting	Prior to Plot Plan Approval	Plot Plan Review		Withhold Building Permits
		Once before permitting	Prior to issuance of Building permit.	Building Permit		Withhold Plot Plan Approval
		Once before issuance of certificate of occupancy.	Prior to issuance of certificate of occupancy.	On-site inspection		Withhold Certificate of Occupancy

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Applicant: Highland Fairview

Date: May 2015

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4.1.6.1C Prior to the issuance of a certificate of occupancy for buildings adjacent to the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing residences at the time of application) the screening required in Mitigation Measure 4.1.6.1A shall be installed in substantial conformance with the approved plans to the satisfaction of the Planning Official	City Planning Division	Once before issuance of certificate of occupancy.	Prior to issuance of certificate of occupancy.	On-site inspection		Withhold Certificate of Occupancy
4.1.6.1D Prior to the issuance of permits for any development activity adjacent to Planning Area 30 (74.3 acres in the southwest portion of the Specific Plan), the entirety of Planning Area 30 shall be offered to the State of California for open space purposes. In the event that the State does not accept the dedication, the property shall be offered to Western Riverside County Regional Conservation Authority or an established non-profit land conservancy for open space purposes. In the event that none of these organizations accepts the dedication, the property may be dedicated to a property owners association or may remain in private ownership and may be fenced and access prohibited.	City Planning Division	Once before permitting of any development activity adjacent to Planning Area 30.	Prior to issuance before of any discretionary permit	Review and Approval of Site Plans		Withhold Discretionary Permit
4.1.6.3A Each Plot Plan application for development shall include plans and visual rendering(s) illustrating any changes in views of Mount Russell and/or the Badlands, for travelers along SR-60, as determined necessary by the Planning Official. The plans and renderings shall illustrate typical views based on proposed project plans, with the location and number of view presentations to be determined by the Planning Official. These views shall be simulated from a height of six feet from the edge of the roadway travel lane closest to the visual resource. The renderings must demonstrate that the	City Planning Division	Once before plot plan review.	Prior to issuance of building permit.	Review and Approval of Renderings		Withhold Building Permit

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development will preserve at least the upper two thirds (67%) of the vertical view of Mt. Russell from SR-60.						
4.1.6.4A Each Plot Plan application for development adjacent to residential development shall include a photometric plot of all proposed exterior lighting demonstrating that the project is consistent with the requirements of Section 9.08.100 of the City Municipal Code. The lighting study shall indicate the expected increase in light levels at the property lines of adjacent residential uses. The study shall demonstrate that the proposed lighting fixtures and/or visual screening meet or exceed City standards regarding light impacts.	City Planning Division	Once before plot plan review for any building adjacent to residential development.	Prior to issuance of any building permit	Review and Approval of Lighting Study		Withhold Building Permit
4.1.6.4B Each Plot Plan application for development shall include an analysis of all proposed solar panels demonstrating that glare from panels will not negatively affect adjacent residential uses or negatively affect motorists along perimeter roadways. Design details to meet these requirements shall be implemented to the satisfaction of the Planning Official.	City Planning Division	Once before plot plan review Once before Building Permit	Prior to issuance of any building permit	Review and Approval of Building Plans for solar panels.		Withhold Building Permit
4.2 Agriculture						
4.2.6.1A Prior to the issuance of any grading permit affecting land designated as "Unique Farmland" (Figure 4.2.2 in the World Logistics Center Environmental Impact Report), an Agricultural Conservation Easement shall be recorded over land of equivalent or better agricultural economic productivity of the offsite easement property compared to the World Logistics Center property. The analysis will include a comparison of the project's "Unique Farmland" considering its relative economic	City Planning Division	Once before issuance of grading permits on lands that contain unique farmland.	Prior to issuance of any grading permits.	City review of form and content of agricultural easement proposed by the developer. And City receives written verification of an agricultural easement.		Withhold Grading Permit.

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potential as the best measure of productivity (i.e., net profitability per acre or potential net rental income per acre). It will include a consideration of various important physical factors including location and accessibility, soils and topography, micro and macro climatic conditions, water availability and quality, as well as local practices, good farm management and cultural (growing) costs. The form and content of this easement, as well as the estimates of agricultural productivity, shall be reviewed and approved in advance by the Planning Official.						
4.3 Air Quality						
<p>4.3.6.2A Construction equipment maintenance records (including the emission control tier of the equipment) shall be kept on site during construction and shall be available for inspection by the City of Moreno Valley.</p> <p>a) Off-road diesel-powered construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency Tier 4 off-road emissions standards. A copy of each unit's certified tier specification shall be available for inspection by the City at the time of mobilization of each applicable unit of equipment.</p> <p>b) During all construction activities, off-road diesel-powered equipment may be in the "on" position not more than 10 hours per day.</p> <p>c) Construction equipment shall be properly maintained according to manufacturer</p>	City Planning Division	As need during construction	During construction	On-site Inspection of construction equipment maintenance records and data sheets.		Issuance of Stop Work Order

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specifications.						
d) All diesel powered construction equipment, delivery vehicles, and delivery trucks shall be turned off when not in use. On-site idling shall be limited to three minutes in any one hour.						
e) Electrical hook ups to the power grid shall be provided for electric construction tools including saws, drills and compressors, where feasible, to reduce the need for diesel-powered electric generators. Where feasible and available, electric tools shall be used						
f) The project shall demonstrate compliance with South Coast Air Quality Management District Rule 403 concerning fugitive dust and provide appropriate documentation to the City of Moreno Valley.						
g) All construction contractors shall be provided information on the South Coast Air Quality Management District Surplus Off-road Opt-In "SOON" funds which provides funds to accelerate cleanup of off-road diesel vehicles.						
h) Construction on-road haul trucks shall be model year 2007 or newer.						
i) Information on ridesharing programs shall be made available to construction employees.						
j) During construction, lunch options shall be						

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<p>provided onsite.</p> <p>k) A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints per AQMD Standards.</p> <p>l) Only non-diesel material handling equipment may be used in any logistics building in the WLC.</p> <p>m) Off-site construction shall be limited to the hours between 6 a.m. to 8 p.m. on weekdays only. Construction during City holidays shall not be permitted.</p>						
<p>4.3.6.2B Prior to issuance of any grading permits, a traffic control plan shall be submitted to and approved by the City of Moreno Valley that describes in detail the location of equipment staging areas, stockpiling/storage areas, construction parking areas, safe detours around the project construction site, as well as provide temporary traffic control (e.g., flag person) during construction-related truck hauling activities. Construction trucks shall be rerouted away from sensitive receptor areas. Trucks shall use State Route 60 using Theodore Street, Redlands Boulevard (north of Eucalyptus Avenue), and Gilman Springs Road. In addition to its traffic safety purpose, the traffic control plan can minimize traffic congestion and delays that increase idling emissions. A copy of the approved Traffic Control Plan shall be retained on site in the construction trailer.</p>	Transportation Division	Once prior issuance of any grading permits to issuance of any grading permits.	Prior to issuance of any grading permits.	Review and Approval of Traffic Control Plan.		Withhold Grading Permit

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<p>4.3.6.2C The following measures shall be applied during construction of the project to reduce volatile organic compounds (VOC):</p> <p>a) Non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the project to the maximum extent practicable. If such products are not commercially available, products with a VOC content of 100 grams per Liter or lower for both interior and exterior surfaces shall be used.</p> <p>b) Leftover paint shall be taken to a designated hazardous waste center.</p> <p>c) Paint containers shall be closed when not in use</p> <p>d) Low VOC cleaning solvents shall be used to clean paint application equipment.</p> <p>e) Paint and solvent-laden rags shall be kept in sealed containers.</p>	City Engineering and Building and Safety and Planning Division	Throughout construction	During Construction	On-site inspection		Issuance of a Stop Work Order
<p>4.3.6.2D No grading shall occur on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 24).</p>	Land Development Division/Public Works	As needed during construction	During construction	Review of Construction Documentation and On-site Inspection		Issuance of a Stop Work Order
<p>4.3.6.3A Prior to issuance of occupancy permits for each warehouse building within the WLCSP, the developer shall demonstrate to the City that vehicles can access the building using paved roads and parking lots.</p>	City Planning Division	Once Before Permitting	Prior to issuance of occupancy permits for each warehouse	Review and Approval of building plans.		Withhold Occupancy Permit

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<p>4.3.6.3B The following shall be implemented as indicated:</p> <p>Prior to Issuance of a Certificate of Occupancy</p> <p>a) Signs shall be prominently displayed informing truck drivers about the California Air Resources Board diesel idling regulations and the prohibition of parking in residential areas.</p> <p>b) Signs shall be prominently displayed in all dock and delivery areas advising of the following: engines shall be turned off when not in use; trucks shall not idle for more than three consecutive minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report air quality violations.</p> <p>c) Signs shall be installed at each exit driveway providing directional information to the City's truck route. Text on the sign shall read "To Truck Route" with a directional arrow. Truck routes shall be clearly marked per the City Municipal Code.</p>	<p>City Planning Division and Building and Safety</p>	<p>Once before issuance of any certificate of occupancy and ongoing basis.</p>	<p>building</p> <p>Prior to issuance of Certificate of Occupancy</p>	<p>On-site Inspections</p> <p>Collection of VIN data will be identified as the primary method of verifying truck compliance for future project-specific approvals.</p>		<p>Withhold Certificate of Occupancy</p>
<p>On an Ongoing Basis</p> <p>d) Tenants shall maintain records on fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles are maintained pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.</p>	<p>Public Works Inspector</p>	<p>On an ongoing basis</p>	<p>During on-site inspections</p>	<p>On-site Inspections</p> <p>Collection of VIN data will be identified as the primary method of verifying truck compliance for future project-</p>		<p>If any related entitlement has been issued, revocation of the entitlement is warranted.</p>

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<p>e) Tenant's staff in charge of keeping vehicle records shall be trained/certified in diesel technologies, by attending California Air Resources Board approved courses (such as the free, one-day Course #512). Documentation of said training shall be maintained on-site and be available for inspection by the City.</p> <p>f) Tenants shall be encouraged to become a SmartWay Partner.</p> <p>g) Tenants shall be encouraged to utilize SmartWay 1.0 or greater carriers.</p> <p>h) Tenants' fleets shall be in compliance with all current air quality regulations for on-road trucks including but not limited to California Air Resources Board's Heavy-Duty Greenhouse Gas Regulation and Truck and Bus Regulation.</p> <p>i) Information shall be posted in a prominent location available to truck drivers regarding alternative fueling technologies and the availability of such fuels in the immediate area of the World Logistics Center.</p> <p>j) Tenants shall be encouraged to apply for incentive funding (such as the Voucher Incentive Program [VIP], Carl Moyer, etc.) to upgrade their fleet.</p> <p>k) All yard trucks (yard dogs/yard goats/yard jockeys/yard hostlers) shall be powered by electricity, natural gas, propane, or an equivalent non-diesel fuel. Any off-road engines in the yard trucks shall have emissions standards equal to</p>				specific approvals		

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<p>Tier 4 Interim or greater. Any on-road engines in the yard trucks shall have emissions standards that meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.</p> <p>l) All diesel trucks entering logistics sites shall meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Facility operators shall maintain a log of all trucks entering the facility to document that the truck usage meets these emission standards. This log shall be available for inspection by City staff at any time.</p> <p>m) All standby emergency generators shall be fueled by natural gas, propane, or any non-diesel fuel.</p> <p>n) Truck and vehicle idling shall be limited to three (3) minutes.</p>						
<p>4.3.6.3C Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area, a publically-accessible fueling station shall be operational within the Specific Plan area offering alternative fuels (natural gas, electricity, etc.) for purchase by the motoring public. Any fueling station shall be placed a minimum of 1000 feet from any off-site sensitive receptors or off-site zoned sensitive uses. This facility may be established in connection with the convenience store required in Mitigation Measure 4.3.6.3D.</p>	City Building and Safety	Once before issuance of building permits	Prior to issuance of building permits for more than 25 million total square feet of logistics warehousing within the WLC Specific Plan	Review and Approval of Building Plans		Withhold Building Permit

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4.3.6.3D Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area a site shall be operational within the Specific Plan area offering food and convenience items for purchase by the motoring public. This facility may be established in connection with the fueling station required in Mitigation Measure 4.3.6.3C.	City Building and Safety	Before issuance of building permits	Prior to issuance of building permits	Review and Approval of Building Plans		Withhold Building Permit
4.3.6.3E Refrigerated warehouse space is prohibited unless it can be demonstrated that the environmental impacts resulting from the inclusion of refrigerated space and its associated facilities, including, but not limited to, refrigeration units in vehicles serving the logistics warehouse, do not exceed any environmental impact for the entire World Logistics Center identified in the program Environmental Impact Report. Such environmental analysis shall be provided with any warehouse plot plan proposing refrigerated space. Any such proposal shall include electrical hookups at dock doors to provide power for vehicles equipped with Transportation Refrigeration Units (TRUs).	City Planning Division	Once before plot plan review for any building.	Prior to issuance of any building permit	Review and Approval of Building Plans		Withhold Building Permit
4.3.6.4A The following measures shall be incorporated as conditions to any Plot Plan approval within the Specific Plan: a) All tenants shall be required to participate in Riverside County's Rideshare Program. b) Storage lockers shall be provided in each building for a minimum of three percent of the full-time equivalent employees based on a ratio of 0.50 employees per 1,000 square feet of building area. Lockers shall be located in proximity to required bicycle storage facilities.	City Building and Safety, City Planning Division, and Transportation Engineering Division/Public Works	Once before plot plan review for any building.	Prior to issuance of building permits	Review and Approval of Building Plans		Withhold Building Permit

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<p>c) Class II bike lanes shall be incorporated into the design for all project streets.</p> <p>d) The project shall incorporate pedestrian pathways between on-site uses.</p> <p>e) Site design and building placement shall provide pedestrian connections between internal and external facilities.</p> <p>f) The project shall provide pedestrian connections to residential uses within 0.25 mile from the project site.</p> <p>g) A minimum of two electric vehicle-charging stations for automobiles or light-duty trucks shall be provided at each building. In addition, parking facilities with 100 parking spaces or more shall be designed and constructed so that at least three percent of the total parking spaces are capable of supporting future electric vehicle supply equipment (EVSE) charging locations. Only sufficient sizing of conduit and service capacity to install Level 2 Electric Vehicle Supply Equipment (EVSE) or greater are required to be installed at the time of construction.</p> <p>h) Each building shall provide indoor and/or outdoor - bicycle storage space consistent with the City Municipal Code and the California Green Building Standards Code.-Each building shall provide a minimum of two shower and changing facilities for employees.</p> <p>i) Each building shall provide preferred and designated parking for any combination of low-</p>						

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<p>emitting, fuel-efficient, and carpool/vanpool vehicles equivalent to the number identified in California Green Building Standards Code Section 5.106.5.2 or the Moreno Valley Municipal Code whichever requires the higher number of carpool/vanpool stalls.</p> <p>j) The following information shall be provided to tenants: onsite electric vehicle charging locations and instructions, bicycle parking, shower facilities, transit availability and the schedules, telecommunicating benefits, alternative work schedule benefits, and energy efficiency.</p>						
4.4 Biological Resources						
<p>4.4.6.1A All Plot Plan applications within Planning Areas 10 and 12 (i.e. adjacent to the San Jacinto Wildlife Area as shown in Final EIR Volume 2 Figure 4.1.6B) shall provide a 250-foot setback from the southerly property line. Permitted uses within this setback area include landscaping, drainage and water quality facilities, fences and walls, utilities and utility structures, maintenance access drives, and similar related uses. No logistics buildings or truck access/parking/maneuvering facilities are permitted in this setback area.</p>	City Planning Division	Once before issuance of building permits and as needed during construction and operating	Prior to issuance of building permits	Planned Check and Review of Buffer Area		Withhold Building Permits
<p>In addition, logistics buildings within Planning Areas 10 and 12 may not be located within 400 feet of the southerly property line. All development proposals in Planning Areas 10 and 12 shall include a minimum six-foot tall chain link fence or similar barrier to separate warehouse activity from the setback area. This fence/barrier shall have metal mesh installed below and above ground level to prevent animals from moving</p>	City Planning Division	Once before issuance of building permits and as needed during construction and operating	Prior to issuance of building permits	On-site inspection of 250-foot minimum setback		Withhold Building Permits

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<p>between the development area and the setback area.</p> <p>Within Planning Areas 10 and 12, all truck activity areas adjacent to the 250-foot buffer area along the southern property line shall be enclosed by minimum 11-foot tall solid walls to reduce noise and lighting impacts on the adjacent property. This measure shall be implemented to the satisfaction of the Planning Official.</p>	City Land Development Division Manager	Once before issuance of building permits and as needed during construction and operating	Prior to issuance of building permits	On-site inspection of 250-foot minimum setback		Withhold Building Permits
<p>A preliminary landscape plan for the 250-foot setback area shall be submitted with all Plot Plan applications for lots adjacent to the California Department of Fish and Wildlife property. Precise landscape plans shall be submitted with any grading permit for said lots and must be approved prior to the issuance of any building permit on said lots. The landscape plan shall be prepared by a licensed landscape architect in consultation with a qualified biologist and shall be consistent with the design standards contained in the World Logistics Center Specific Plan. No plant species listed in Section 6.1.4 of the Western Riverside County Multiple Species Habitat Conservation Plan shall be installed within the setback area. Cottonwood trees shall be planted within the setback area consistent with the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development Division Manager.</p>	City Land Development Division Manager	Once before issuance of building permits and as needed during construction and operating	Prior to issuance of building permits	On-site inspection of 250-foot minimum setback		Withhold Building Permits
<p>4.4.6.1B Each Plot Plan application in Planning Areas 10 and 12 shall provide runoff management and water quality facilities</p>	City Engineering Division and City Land Development	Once upon submittal of plot plan	Prior to approval of Plot Plan	Review and Approval of plot plans within		Withhold Approval of Plot Plan

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adequate to minimize downstream erosion, maintain water quality standards and retain pre-development flows in a manner meeting the approval of the City Engineer. All drainage improvements shall be designed to minimize runoff and erosional impacts on adjacent property. This measure shall be implemented to the satisfaction of the Land Development Division Manager of Public Works.	Division Manager	application		Planning Areas 10 and 12		
4.4.6.2A Each Plot Plan application shall include a focused plant survey of the proposed development site prepared by a qualified biologist to identify if any of the following sensitive plants (i.e., Coulter's goldfields, smooth tarplant, Plummer's mariposa lily, or thread-leaved brodiaea) are present. If any of the listed plants are found, they may be relocated to the 250-foot setback area outlined in the Specific Plan and discussed in Mitigation Measure 4.4.6.1A. Alternatively, at the applicant's discretion, an impact fee may be paid to the Western Riverside County Regional Conservation Authority (RCA) or other appropriate conservation organizations to offset for the loss of these species. This measure shall be implemented to the satisfaction of the Planning Official.	City Planning Division	Once upon submittal of plot plan application	Prior to approval of Plot Plan	Review and Approval of biological assessment		Withhold Approval of Plot Plan
4.4.6.2B Prior to the approval of any tentative maps for development including or adjacent to any Criteria Cells identified in the Western Riverside County Multiple Species Habitat Conservation Plan, the applicant shall prepare and process a Joint Project Review (JPR) with the Riverside County Resource Conservation Agency (RCA). All criteria cells shall be identified on all such tentative maps. This measure shall be	City Planning Division	Once upon submittal of tentative maps	Prior to approval of any tentative maps	Review and Approval of biological assessment		Withhold Approval of Tentative Maps

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implemented to the satisfaction of the City Planning Division and Riverside County Resource Conservation Agency ("RCA").						
<p>4.4.6.3A Prior to the issuance of grading permits the applicant shall secure a jurisdictional determination from the United States Army Corps of Engineers (USACE) and confirm with the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) if drainage features mapped on the property to be developed are subject to jurisdictional authority. If the features are subject to regulatory protection, the applicant will secure permit approvals with the appropriate agencies prior to initiation of construction. Compensatory riparian habitat mitigation will be provided at a minimum ratio of 1:1 (replacement riparian habitat to impacted riparian habitat) to ensure no net loss of riparian habitat or aquatic resources. It should be noted that this is a minimum recommended ratio but the actual permitting ratio may be higher. These detention basins will be oversized to accommodate the provision of areas of riparian habitat. Maintenance of the basins will be limited to that necessary to ensure their drainage and water quality functions while encouraging habitat growth. Riparian habitat mitigation will be provided concurrent to or prior to impacts. A Compensatory Mitigation Plan will be prepared for all unavoidable impacts and will be consistent with the United States Army Corps of Engineers (USACE)/United States Environmental Protection Agency's Compensatory Mitigation for Losses of Aquatic Resources; Final Rule and the United States Army Corps of Engineers Standard Operating Procedure for Determination of Mitigation Ratios.</p>	City Planning Division and Land Development Division Manager	Once prior to issuance of grading permits	Prior to the issuance of grading permits	Written verification of USACE approval of jurisdictional determination and Clean Water Act Section 404 permit.		Withhold Grading Permit

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<p>The applicant shall consult with United States Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board to establish the need for permits based on the results of a recent jurisdictional delineation and final design plans for each of the proposed the facilities. Consultation with the three agencies shall take place and appropriate permits obtained for project-level development. Compensation for losses associated with the altering of drainages on site shall be in agreement with the permit conditions and in coordination with compensation outlined below.</p> <p>Mitigation will consist of onsite creation, offsite creation, or purchase of mitigation credits from an approved mitigation bank. As outlined in the WLC programmatic DBESP report, onsite riparian habitat will be created at a minimum 1:1 ratio due to the poor quality of onsite habitat. New habitat will be created within the onsite detention/infiltration basins to the extent allowed by the resource agencies to reduce storm flows, improve water quality, and reduce sediment transport. Habitat creation will include the installation of mule fat scrub or similar riparian scrub habitat to promote higher quality riparian habitat, but still maintain the basins for their primary role as detention facilities. The use of these areas as conservation areas would require consent from CDFW and the City of Moreno Valley (MM BIO-2b and MM DBESP 1 through 3).</p>						
<p>4.4.6.3B As required by the Resource Conservation Agency (RCA), a program-level Determination of a Biological Equivalent or</p>	City Planning Division	Once upon submittal of plot plan	Prior to the approval of any Plot Plans	Review and Approval of site specific DBESP and		Withhold Approval Plot Plans

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<p>Superior Preservation (DBESP) for impacts to Riverine/Riparian habitat has been prepared and shall be approved by the Resource Conservation Agency prior to project approval. The Determination of a Biologically Equivalent or Superior Preservation includes a general discussion of mitigation options for impacts to riverine/riparian areas as well as general location and size of the mitigation area and includes a monitoring program.</p> <p>If impacts to riparian habitat within the World Logistics Center Specific Plan (WLCSP) cannot be avoided at the time of specific development, then a separate project-level Determination of Biologically Equivalent or Superior Preservation (DBESP) shall be prepared to identify project-specific impacts to riparian habitat and incorporate mitigation options identified in Mitigation Measure 4.4.6.3A.</p> <p>A project-level Determination of a Biological Equivalent or Superior Preservation for each specific development shall be prepared to document measures to reduce impacts to riparian/riverine habitats in accordance with the Western Riverside County Multiple species Habitat Conservation Plan (MSHCP). The project-level Determination of a Biological Equivalent or Superior Preservation shall include specific measures to reduce impacts to riparian areas and provide mitigation in the form of onsite preservation of riparian areas and/or a combination of compensation through purchase and placement of lands with riparian/riverine habitat into permanent conservation through a conservation easement and/or restoration or</p>		application		review and approval of plot plans.		

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<p>enhancement efforts at offsite or onsite locations. Therefore, mitigation required for compensation for impacts to riparian/ riverine areas will require a minimum of 1:1 mitigation ratio of riparian/riverine mitigation land.</p> <p>As outlined in the WLC programmatic DBESP, erosion control improvements will be installed within Drainage 9 to reduce sediment transport, and additional riparian habitat will be enhanced within this drainage following the installation of the erosion control improvements (MM DBESP 4 and 5).</p>						
<p>4.4.6.3C Prior to issuance of any grading permit for any offsite improvements that support development within the World Logistics Center Specific Plan, the developer shall retain a qualified biologist to prepare a jurisdictional delineation (JD) for any drainage channels affected by construction of the offsite improvements. This jurisdictional delineation shall be submitted to the U.S. Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW) for review and concurrence. If the offsite improvements will not affect any identified jurisdictional areas, no United States Army Corps of Engineers permitting is required. However, permitting through the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (i.e., Streambed Alternation Agreement) may still be required for these improvements. The applicant shall consult with United States Army Corps of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board to establish the need for permits based on the</p>	City Planning Division	Once before issuance of grading permit	Prior to issuance of grading permit	Review and Approval of jurisdictional delineation		Withhold Grading Permit
	City Planning Division	Once before issuance of grading permit	Prior to issuance of grading permit	Written verification of USACE approval of jurisdictional determination and Clean Water Act Section 404 permit.		Withhold Grading Permit

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results of the 2012 jurisdictional delineation and final design plans for each of the proposed the facilities. Consultation with the three agencies shall take place and appropriate permits obtained. Compensation for losses associated with any altered offsite drainages shall be in agreement with the permit conditions. Any landscaping associated with these offsite improvements shall use only native species to help protect biological resources residing within or traveling through these drainages per Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Table 6.1.2. This measure shall be implemented to the satisfaction of the City Planning Division in consultation with the U.S. Fish and Wildlife Service, U.S. Army Corps. of Engineers, and the California Department of Fish and Wildlife.						
4.4.6.4A Pursuant to the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC), site preparation activities (removal of trees and vegetation) shall be avoided during the nesting season of potentially occurring native and migratory bird species (generally February 1 to August 31). If site preparation activities must occur during the nesting season, a pre-activity field survey shall be conducted by a qualified biologist prior to issuance of grading permits for such development. The survey shall determine if active nests of species protected by the Migratory Bird Treaty Act or California Fish and Game Code are present in the construction zone. If active nests of these species are found, the developer shall establish an appropriate buffer zone with no grading or heavy equipment activity within of 500 feet from an active listed species or raptor nest, 300 feet from other sensitive or	City Planning Division	Once before issuance of grading permit	Prior to issuance of grading permit	If grading activities will take place within nesting season provide written evidence a qualified biologist has been retained by the applicant to conduct an onsite nesting survey prior to grading.		Withhold Grading Permit
	City Planning Division	Onsite inspection	Prior to issuance of grading permit	If nesting birds are present biologist will establish a		Issuance of a Stop Work Order

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protected bird nests (non-listed), 250 feet from passerine birds, or 100 feet for sensitive or protected songbird nests. All construction activity within the vicinity of active nests must be conducted in the presence of a qualified biological monitor. Construction activity may encroach into the buffer area at the discretion of the biological monitor in consultation with CDFW. In the event no special status avian species are identified within the limits of disturbance, no further mitigation is required. In the event such species are identified within the limits of ground disturbance, mitigation measure 4.4.6.4B shall also apply. This measure shall be implemented to the satisfaction of the City Planning Division.				construction buffer zone of a minimum from an active listed species or raptor nest, 300 feet from other sensitive or protected bird nests (non-listed), or 100 feet for sensitive or protected songbird nests		
4.4.6.4B If it is determined that project-related grading or construction will affect nesting migratory bird species, no grading or heavy equipment activity shall take place within the limits established in Mitigation Measure 4.4.6.4A until it has been determined by a qualified biologist that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow. This measure shall be implemented to the satisfaction of the City Planning Division.	City Planning Division	Once Before Construction and onsite inspection	Prior to disturbance of site	On-site inspection		Issuance of a Stop Work Order
4.4.6.4C The loss of foraging habitat for golden eagle and white-tailed kite will be mitigated by payment of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) fee and the creation of a landscaped buffer area adjacent to the San Jacinto Wildlife Area property (SJWA). First, the payment of the Western Riverside County Multiple species Habitat Conservation Plan fee will be required on a project-by-project basis. Second, a 250-foot setback as described in Mitigation Measure	City Planning Division	Once before issuance of grading permits	Prior to disturbance of site	Written verification of payment of MSHCP fees		Withdraw Grading Permit

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<p>California Department of Fish and Wildlife. A relocation plan may be required by California Department of Fish and Wildlife if active and/or passive relocation is necessary. The relocation plan will outline the basic process and provides options for avoidance and mitigation. Artificial burrows -may be constructed within the buffer area south of the World Logistics Center Specific Plan. Construction activity may occur within 500 feet of the burrows at the discretion of the biological monitor in consultation with CDFW.</p> <p>A relocation plan may be required by California Department of Fish and Wildlife if active or passive relocation is necessary. Artificial burrows may be constructed within appropriate burrowing owl habitat within the proposed open space/conservation area (Planning Area 30), a 74.3-acre area in the southwest portion of the Specific Plan. This area abuts the Lake Perris State Recreation Area (LPSRA) which is already in conservation. If suitable habitat is not present in Planning Area 30, owls may be relocated to the SJWA, the 250-foot buffer area or other suitable on-site or off-site areas. Construction activity may occur within 500 feet of the burrows at the discretion of the biological monitor.</p>	City Planning Division	Onsite inspection once 30-days prior to construction/grading	Prior to issuance of any grading permits and during construction	<p>passive relocation plan shall be prepared by a qualified biologist and approved by the City.</p> <p>Written verification a relocation plan has been approved by the California Department of Fish and Wildlife</p>		Issuance of a Stop Work Order
<p>4.4.6.4E Prior to the approval of any Plot Plans proposing the development of land including or adjacent to Drainage 9, a protocol survey for the Los Angeles Pocket Mouse (LAPM), including 100 feet upstream and downstream of the affected reach shall be prepared by a qualified biologist and submitted to the City. If the affected drainage is not occupied, the area is considered not to be occupied and development can continue without further action. If the species is</p>	City Planning Division	Once prior to plot plan approval for development of land including or adjacent to Drainage 9	Prior to plot plan approval	Submittal of a LAPM protocol survey report to the City.		Withhold Approval Plot Plans

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found within the specific survey area, no development shall occur until an appropriate mitigation fee is paid or appropriate amount of land set aside on the project site or off site to compensate for any loss of occupied Los Angeles Pocket Mouse habitat. Alternatively, individuals may be relocated to the 250-foot setback zone along the southern boundary of the property identified in Mitigation Measure 4.4.6.1A, or other appropriate areas as determined by the United States Fish and Wildlife Service. If necessary, this measure shall also be coordinated with Mitigation Measure 4.4.6.2B regarding preparation and processing of a Determination of a Biological Equivalent or Superior Preservation report. This measure shall be implemented to the satisfaction of the City Planning Division.						
<p>4.4.6.4F Prior to approval of any discretionary permits for development within Planning Areas 10 and 12, a Biological Resource Management Plan (BRMP) shall be prepared to prescribe how the 250-foot setback area outlined in Mitigation Measure 4.4.6.1A will be developed and maintained This plan will identify frequent and infrequent vegetation management requirements (i.e., removal of invasive plants) and the planting and maintaining trees to provide roosting and nesting opportunities for raptors and other birds. The Biological Resource Management Plan will also describe how relocation of listed or sensitive species will occur from other locations as outlined in Mitigation Measures 4.4.6.2A, 4.4.6.4D, and 4.4.6.4E.</p> <p>The Biological Resource Management Plan shall be reviewed and approved by the Planning</p>	City Planning Official	Once before approval of any discretionary permits within Planning Areas 10 & 12 Onsite inspection	Prior to approval of any discretionary permits within Planning Areas 10 & 12	Review and approval of a BRMP		Withhold Discretionary Permit

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Official in consultation with the San Jacinto Wildlife Area Manager. The Biological Resource Management Plan shall cover all the land within the 250-foot setback zone within Planning Areas 10 and 12 Implementation of the plan shall be supervised by a qualified biologist, to the satisfaction of the City Planning Division.						
<p>4.4.6.4GMitigation Measure 4.4.6.1A specifies that a landscape plan shall be submitted with any development proposal for lots adjacent to the California Department of Fish and Wildlife (CDFW) San Jacinto Wildlife Area (SJWA) property prior to issuance of a precise grading permit. The landscape plan shall be prepared by a licensed landscape architect in consultation with a qualified biologist and shall be consistent with the design standards contained in the Specific Plan. No plant species listed in Section 6.1.4 or Table 6.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) shall be installed within the setback area. In conjunction with development adjacent to the San Jacinto Wildlife Area (SJWA), cottonwood trees shall be planted within the 250-foot setback area, consistent with the World Logistics Center Specific Plan plant palette (per DBESP MM 8).</p> <p>During construction, the runoff leaving construction areas will be directed to onsite detention basins and away from downstream drainage features located offsite. All projects within the WLCSP will be required to prepare a Storm Water Pollution Prevention Plan (as outlined in MM 4.9.6.2B). Regarding the 250-foot setback area, pedestrian and vehicular access to areas of riparian/riverine habitat will be prohibited</p>	City Planning Division and Land Development Division Manager	Once before to issuance of a precise grading permit	Prior to issuance of a precise grading permit	Review and approval of landscape plan		Withhold Grading Permit

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except for controlled maintenance access. Finally, no grading shall be permitted within conserved riparian/riverine habitat areas except for grading necessary to established or enhance habitat areas (DBESP MM 6, 7, 9, and 10).						
4.4.6.4H As outlined in Mitigation Measure 4.4.6.1A, development adjacent to the 250-foot open space setback shall have a six-foot chain link fence or similar barrier to help separate human activity and the buffer area. Any chain link fencing installed on any properties adjacent to the 250-foot buffer area shall have metal mesh installed below and above ground level to prevent animals from accessing new development areas.	City Planning Division	Once before building permits	Prior to issuance of certificate of occupancy	Review and approval of fencing plan		Withhold Certificate of Occupancy
4.4.6.4I The individual property owner and/or Property Owners Association (POA) as appropriate shall be responsible for maintaining the various onsite landscaped areas, open improved or natural drainage channels, and detention or flood control basins in a manner that provide for fuel management and vector control pursuant to standards maintained by the City Fire Marshall and County Department of Environmental Health- Vector Control Group. This measure requires the individual owner or Property Owners Association (POA) to manage vegetation in and around these areas or improvements so as to not represent a fire hazard as defined by the City Fire Department through the substantial buildup of combustible materials. This measure also requires the individual owner or Property Owners Association to manage vegetation and standing water in drainage channels and basins such that they do not encourage or allow vectors to occur (primarily	City Fire Department Land Development Division and Stormwater Management Section of Public Works	As needed basis	Onsite Inspections during operations	Onsite Inspections		Issuance of Code Enforcement Citations

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rats and mosquitoes). Runoff shall not be allowed to stand in channels or basins for more than 72 hours without treatment or maintenance to prevent establishment of mosquitoes per published County vector control guidelines and "Best Management Practices for Mosquito Control on California State Properties" which is available from the California West Nile Virus website at http://www.westnile.ca.gov/resources . This measure shall be implemented by the Property Owners Association in consultation with the City Fire Department and Riverside County Department of Environmental Health – Vector Control Group.						
<p>4.4.6.4J A Fuel Management Plan shall be prepared on a project-by-project basis for those Planning Areas adjacent to the south and east boundary of the World Logistics Center Specific Plan adjacent to Western Riverside County Multiple Species Habitat Conservation Plan Conservation Areas. The Fuel Management Plan shall be prepared by the project proponent and submitted for approval to the prior to plot plan approval for those projects on the southern and eastern Western Riverside County Multiple Species Habitat Conservation Plan boundary. Per the Western Riverside County Multiple Species Habitat Conservation Plan guidelines, the Fuel Management Plan shall include the following:</p> <ul style="list-style-type: none"> • A plant palette of adequate plant species that may be planted within the Fuel Management Area, which will be approved by a biologist familiar with the plant requirements of the area. • A list of non-native invasive plants that are 	City Planning Division	Prior to Issuance of Building Permit	Prior to Issuance of Building Permit	Review and Approval of Building Permit and Onsite Inspection		Withhold Building Permit

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<p>prohibited from installation.</p> <ul style="list-style-type: none"> Maintenance activities and a maintenance schedule. <p>Fuel modification zones shall be mapped and include an impact assessment as required under California Environmental Quality Act guidelines for a project-level analysis. The plan shall demonstrate that the adjacent Western Riverside County Multiple Species Habitat Conservation Plan Areas are adequately protected from expected fire risks.</p>						
<p>4.4.6.4K Prior to approval of any plot plans for development adjacent to the SJWA, the applicant shall demonstrate that direct light rays have been contained within the development area, per requirements of the MSHCP Section 6.0 which states, "Night lighting shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting." This measure shall be implemented to the satisfaction of the City Planning Division.</p>	City Planning Division	Prior to Issuance of Building Permit	Prior to Issuance of Building Permit	Review and Approval of Building Permit and Onsite Inspection		Withhold Building Permit
4.5 Cultural Resources						
<p>4.5.6.1A Prior to the approval of any grading permit for any of the "Light Logistics" parcels, the parcels shall be evaluated for significance by a qualified archaeologist. A Phase 1 Cultural Resources Assessment shall be conducted by the project archaeologist and an appropriate tribal representative(s) on each of the "Light Logistics" parcel to determine if significant archaeological or historical resources are present.</p> <p>A Phase 2 significance evaluation shall be</p>	Planning Division And Land Development Division/Public Works	Once Before Permitting	Prior to the approval of any grading or discretionary permit for any of the "Light Logistics"	Review and Approval of Phase I Cultural Resources Assessment		Withhold Grading or Discretionary Permits

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completed for any of these sites in order to determine if they contain significant archaeological or historical resources. Cultural resources include but are not limited to stone artifacts, bone, wood, shell, or features, including hearths, structural remains, or historic dumpsites. All resources determined to be prehistoric or historic shall be documented using DPR523 forms for archival research/storage in the Eastern Information Center (EIC). If the particular resource is determined to be not significant, no further documentation is required. If prehistoric resources are determined to be significant, they shall be considered for relocation or archival documentation. If any resource is determined to be significant, a Phase 3 recovery study shall be conducted to recover remaining significant cultural artifacts. If prehistoric archaeological/cultural resources are discovered during the Phase 1 survey and it is determined that they cannot be avoided through site design, they shall be subject to a Phase 2 testing program. The project archaeologist in consultation with appropriate tribal group(s) shall determine the significance of the resource(s) and determine the most appropriate disposition of the resource(s) in accordance with applicable laws, regulations and professional practices (per Cultural Report MM CR-1, MM CR-2, MM CR-7 Table 3, pg.74).						
4.5.6.1B Prior to the issuance of any grading or ground-disturbing permit for construction of off-site improvements a qualified archaeologist shall be retained to prepare a Phase I cultural resource assessment (CRA) of the project site if an up to date Phase I cultural resource assessment is not available for the site at the	City Planning Division	Once before issuance of grading permits for off-site improvements and As	Prior to the approval of any grading or ground-disturbing permit	Review and Approval of Phase I Cultural Resources Assessment		Withhold Grading Permit or Issuance of Stop Work Order

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<p>time of development per Cultural Report MM CR-5, Table 3, pg.74).</p> <p>Appropriate tribal representatives as identified by the City shall be invited by the Project Archeologist to participate in this assessment. If archaeological resources are discovered during construction activities, no further excavation or disturbance of the area where the resources were found shall occur until a qualified archaeologist evaluates the find. If the find is determined to be a unique archaeological resource, appropriate action shall be taken to (a) plan construction to avoid the archeological sites (the preferred alternative); (b) cap or cover archeological sites with a layer of soil before building on the affected project location; or (c) excavate the site to adequately recover the scientifically consequential information from and about the resource. At the discretion of the project archaeologist, work may continue on other parts of the project site while the unique archaeological resource mitigation takes place. This measure shall be implemented to the satisfaction of the Planning Official.</p> <p>If the project archaeologist, in consultation with the monitoring Tribe(s), determines that the find is a unique archaeological resource, the resource site shall be evaluated and recorded in accordance with requirements of the State Office of Historic Preservation (OHP). If the resource is determined to be significant, data shall be collected by the qualified archaeologist and the findings of the report shall be submitted to the City. If the find is determined to be not significant no mitigation is necessary.</p>		Needed During Construction				

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<p>Should a future project-level analysis show that cultural resource site CA-RIV-3346 will be directly or partially impacted by project-level construction, an Addendum cultural resource report must be prepared and include an analysis of the alternatives associated with mitigation for impacts to this resource following CEQA Guidelines Section 15126.4(b)(3). This information must be included in any project-level CEQA compliance documentation. It should be noted that Phase 3 data recovery is an acceptable mitigation action under CEQA Guidelines Section 15126.4(b)(3)(C) (per Cultural Report MM CR-3, Table 3, pg.74).</p> <p>Should it be determined through a future project-level EIR analysis that prehistoric cultural resource sites CA-RIV-2993 and/or CA-RIV-3347 shall be directly impacted by future construction, these sites must be Phase 2 tested for significance (per Cultural Report MM CR-4, Table 3, pg.74).</p>						
<p>4.5.6.1C Prior to the issuance of any grading permits a qualified archaeologist shall be retained to monitor all grading and shall invite tribal groups to participate in the monitoring. Project-related archaeological monitoring shall include the following requirements per Cultural Report MM CR-6, MM CR-8, Table 3, pg.74):</p> <p>1. All earthmoving shall be monitored to a depth of ten (10) feet below grade by the Project Archaeologist or his/her designated representative. Once all areas of the development project that have been cut to 10 feet below existing grade have been inspected by</p>	The City Planning Division	Once before issuance of grading permits and As Needed During Construction	Prior to any issuance of grading permits	Provide evidence to the City that a qualified archaeological monitor has been retained to oversee all ground altering activities		Withhold Grading Permit

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<p>the monitor, the Project Archaeologist may, at his or her discretion, terminate monitoring if and only if no buried cultural resources have been detected;</p> <p>2. If buried cultural resources are detected, monitoring shall continue until 100 percent of virgin earth within the specific project area has been disturbed and inspected by the Project Archaeologist or his/her designated representative.</p> <p>3. Grading shall cease in the area of a cultural artifact or potential cultural artifact as delineated by the Project Archaeologist or his/her designated representative. A buffer of at a minimum 25 feet around the cultural item shall be established to allow for assessment of the resource. Grading may continue in other areas of the site while the particular find are investigated; and</p> <p>4. If prehistoric cultural resources are uncovered during grading, they shall be Phase 2 tested by the Project Archaeologist, and evaluated for significance in accordance with §15064.5(f) of the CEQA Guidelines. Appropriate actions for significant resources as determined by the Phase 2 testing include but are not limited to avoidance or capping, incorporation of the site in green space, parks, or delineation into open space. If such measures are not feasible, Phase 3 data recovery of the significant resource will be required, and curation of recovered artifacts and/or reburial, shall be required. A report associated with Phase 2 testing or Phase 3 data recovery must be delivered to the City and, if</p>						

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necessary, the museum where any recovered artifacts have been curated. 5. No further grading shall occur in the area of the discovery until the City approves specific actions to protect identified resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the City where they would be afforded long-term preservation to allow future scientific study. 6. The developer shall make reasonable efforts to avoid, minimize, or mitigate significant adverse impacts on cultural resources. The State Historic Preservation Office (SHPO) and local Native American tribes will be consulted and the Advisory Council on Historic Preservation will be notified within 48 hours of the find in compliance with 36 CFR 800.13(b)(3). This measure shall be implemented to the satisfaction of the Planning Official.						
4.5.6.1D Prior to the issuance of any grading permit the project archaeologist shall invite interested Tribal Group(s) representatives to monitor grading activities. Qualified representatives of the Tribal Group(s) shall be granted access to the project site to monitor grading as long as they provide 48-hour notice to the developer of their desire to monitor, so the developer can make appropriate safety arrangements on the site. This measure shall be implemented to the satisfaction of the Planning Official.	City Planning Division	Once before issuance of grading permits and As Needed During Construction	Prior to the issuance of any grading permit within 3,750 feet of the southwest corner	Evidence of invitation to Tribal Group Representatives		Withhold Grading Permit
4.5.6.1E It is possible that ground-disturbing activities during construction may uncover	Grading Contractor, Land Development	As Needed During	During grading and/or ground	Verification to the City a qualified		Issuance a Stop Work

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<p>previously unknown, buried cultural resources (archaeological or historical). In the event that buried cultural resources are discovered during grading and no Project Archaeologist or Historian is present, grading operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be retained to determine the most appropriate course of action regarding the resource. The Archeologist shall make recommendations to the City on the actions that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with §15064.5 of the <i>CEQA Guidelines</i>. Cultural resources could consist of, but are not limited to, stone artifacts, bone, wood, shell, or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of CEQA criteria. If the resources are determined to be unique historic resources as defined under §15064.5 of the <i>CEQA Guidelines</i>, appropriate protective actions for significant resources such as avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds shall be implemented by the project archaeologist and the City.</p> <p>No further grading shall occur in the area of the discovery until the City and project archaeologist approve the measures to address these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a</p>	Division/Public Works, and Planning Division	Construction	disturbing activities	archaeologist been retained		Order

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qualified scientific institution approved by the City where they would be afforded long-term preservation to allow future scientific study.						
4.5.6.2A If any historic resources are found during implementation of Mitigation Measure 4.5.6.1A, the Project Archaeologist or Historian (as appropriate) shall offer any artifacts or resources to the Moreno Valley Historical Society (MVHS) or the Eastern Information Center/County Museum or the Western Science Center in Hemet as appropriate for archival storage. From the time any artifacts are turned over to the Moreno Valley Historical Society or other appropriate historical group, the developer shall have no further responsibility for their management or maintenance.	City Planning Division	As Needed During Construction	During grading	A qualified archaeologist or historian(s) shall be retained by the applicant. A report of findings shall be submitted to the City after the finalization of construction		Issuance of a Stop Work Order
4.5.6.2B As part of construction of the trail segment connecting Redlands Boulevard to the California Department of Fish and Wildlife property, the developer shall contribute \$5,000 to the City for the installation of a historical marker acknowledging the passing of Juan Bautista de Anza through this area during his exploration of California. This measure shall be incorporated into trail plans for this segment which will be subject to review and approval by the City Park and Recreation Department in consultation with the Moreno Valley Historical Society.	City Park and Recreation Department	Once	Prior to approval of trail plans	Review and Approval of Trail Plans Written verification the \$5,000 has been paid		Withhold Approval of Trail Plans
4.5.6.2C Streets C and E shall follow the historical alignment of Alessandro Boulevard and shall be named Alessandro Boulevard.	City Land Development/Public Works City Park and Recreation Department	Once prior to issuance of Plot Plan	Prior to issuance of approval of plot plans for Planning Areas along	Review and Approval of Plot Plans		Withhold Plot Plan approval

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Applicant: Highland Fairview

Date: May 2015

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			Alessandro Boulevard.			
<p>4.5.6.3A Prior to the issuance of any grading permits, a City-approved Paleontologist shall be retained to conduct paleontological monitoring as needed for all grading related to development. Development monitoring shall include the following actions:</p> <ol style="list-style-type: none"> Monitoring must occur in areas where excavations are expected to exceed twenty (20) feet in depth, in areas where fossil-bearing formations are found during grading, and in all areas found to contain, or are suspected of containing, fossil-bearing formations. To avoid construction delays, paleontological monitors shall be equipped to salvage fossils and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates if they are unearthed. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of specimens. Monitoring may be reduced if the potentially fossiliferous units described herein are not present, or, if present, are determined upon exposure and examination by the Project Paleontologist to have low potential to contain fossil resources. This measure shall be implemented to the satisfaction of the Planning Official. The Project Paleontologist and the Project Archaeologist described in Mitigation Measure 4.5.6.1C may be the same person if he/she meets the qualifications of both positions 	City Planning Division	Once before issuance of grading permits and As Needed During Construction	Prior to issuance of any grading permits for development within the WLCSP	A qualified paleontologist(s) shall be retained by the applicant to monitor full time during the duration of ground disturbing activities. A report of findings shall be submitted to the City after the finalization of construction		Withhold Grading Permit Or Issuance of a Stop Work Order

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per Cultural Report MM PR-1, Table 4, pg.76).						
<p>4.5.6.3B Prior to the issuance of any permits for the construction of off-site improvements, a qualified paleontologist shall conduct an assessment for paleontological resources on each off-site improvement location. If any site is determined to have a potential for exposing paleontological resources, the project paleontologist shall monitor off-site grading/excavation, subject to coordination with the City. Development monitoring shall include the following mitigation measures:</p> <p>1. Monitoring must occur in areas where excavations are expected to reach fossil-bearing formations during grading. This monitoring must be conducted by the Project Paleontologist in all areas found to or suspected of containing fossil-bearing formations.</p> <p>2. To avoid construction delays, the Project Paleontologist shall be equipped to salvage fossils and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates as they are unearthed.</p> <p>3. The Project Paleontologist shall be empowered to temporarily halt or divert equipment to allow removal of specimens.</p> <p>4. Monitoring may be reduced if the potentially fossiliferous units described herein are not present, or, if present, are determined upon exposure and examination by the Project Paleontologist to have low potential to contain fossil resources.</p>	City Planning Division	Once before issuance of grading permits and As Needed During Construction	Prior to issuance of grading permits for construction of any off-site improvements	A qualified paleontologist(s) shall be retained by the applicant to monitor full time during the duration of ground disturbing activities. A report of findings shall be submitted to the City after the finalization of construction.		Withhold Grading Permit Or Issuance of a Stop Work Order

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4.6 Geology and Soils						
<p>4.6.6.1A Prior to approval of any projects for development between Redlands Boulevard and Theodore Street, south of Dracaea Avenue (projected east from Redlands Boulevard), and the area south of Alessandro from the western boundary along the Mount Russell toe of slope easterly into the site 1,500 feet, the City shall determine if a detailed fault study of the Casa Loma Fault Zone area is required based on available evidence. If necessary, any additional geotechnical investigations shall be prepared by a qualified geologist and determine if structural setbacks are needed, and shall identify specific remedial earthwork and/or foundation recommendations. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance</p>	<p>City Engineer and Project Geologist and Land Development/ Public Works</p>	<p>Once before project approvals</p>	<p>Prior to approval of any projects for future development between Redlands Boulevard and Theodore Street, south of Dracaea Avenue (projected east from Redlands Boulevard), and the area south of Alessandro from the western boundary along the Mount Russell toe of slope easterly into the site 1,500 feet.</p>	<p>Review and approval of geotechnical fault study.</p>		<p>Withhold Approval of Projects</p>

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with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Structures intended for human occupancy shall not be located within any structural setback zone as determined by those studies. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.						
4.6.6.1B Prior to approval of any projects for development within or adjacent to the San Jacinto Alquist-Priolo Earthquake Fault Zone, the City shall review and approve a geotechnical fault study prepared by a qualified geologist to confirm the alignment and size of any required building setbacks related to the fault zone. If necessary, this study shall identify a "special foundation or grading remediation zone" for the areas supporting structures intended for human occupancy where coseismic deformation (fractures) is observed. This zone shall be determined after subsurface evaluation based on proposed building locations. Specific remedial earthwork and foundation recommendations shall be evaluated as necessary based on proposed building locations. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that	City Engineer and Project Geologist Land Development/Public Works	Once before approval of any development permits and Prior to Plot Plan Approval	Prior to approval of any projects for future development within or adjacent to the San Jacinto Alquist-Priolo Earthquake Fault Zone.	Review and approval of geotechnical fault study.		Withhold Approval of Projects

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<p>all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.</p> <p>This study may involve trenching to adequately identify the location of the Claremont segment of the San Jacinto Fault Zone that crosses the eastern portion of the World Logistics Center Specific Plan property. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.</p>						
<p>4.6.6.1C Prior to the approval of grading permits, or permits for construction of off-site improvements, the City shall review and approve plans confirming that the project has been designed to withstand anticipated ground shaking and other geotechnical and soil constraints (e.g., settlement). The project proponent shall submit plans to the City as appropriate for review and approval prior to issuance of grading permits or issuance of permits for the construction of any offsite improvements. This measure shall be</p>	City Engineer and Land Development/ Public Works	Once before issuance of grading permits	Prior to the approval of project grading permits, or permits for construction of off-site improvements	Review and approve grading and construction plans		Withhold Issuance of Grading Permits

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implemented to the satisfaction of the City Engineer.						
<p>4.6.6.2A Prior to issuance of building permits for any portion of the project site, a site-specific, design level geotechnical investigation for each parcel shall be submitted to the City, which would comply with all applicable state and local code requirements, and includes an analysis of the expected ground motions at the site from known active faults using accepted methodologies. The report shall determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults. The report shall also determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and</p>	City Engineer and Land Development/Public Works	Once before issuance of any building permits	Prior to issuance of any building permits	Review and approval of a site-specific, design level geotechnical investigation for each parcel		Withhold Building Permits

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all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.						
<p>4.6.6.3A Each Plot Plan application for development shall include a site-specific, design level geotechnical investigation for each parcel, in compliance with all applicable state and local code requirements, and including an analysis of the expected soil hazards at the site. The report shall determine:</p> <p>1. Structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults.</p> <p>2. The final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements.</p> <p>Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable</p>	City Engineer and Land Development/Public Works	Once before plot plan approval	Prior to the approval of a Plot Plan for any development project or associated off-site improvements	Submittal and Approval of Geotechnical Report		Withhold Approval of Plot Plan

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<p>mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. These investigations shall identify any site-specific impacts from compressible and expansive soils based on the actual location of individual pads proposed in the future, so that differential movement can be further verified or evaluated in view of the actual foundation plan and imposed fill or structural loads. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.</p> <p>Compliance with this measure will ensure that future buildings are designed to protect the structure and occupants from on-site soil limitations, consistent with State Building Code requirements. This measure shall be implemented to the satisfaction of the City Engineer.</p>						
<p>4.6.6.3B Any cut slopes in excess of five (5) feet in vertical height shall be constructed as "replacement fill slopes" per the project</p>	City Land Development Division and City	Once before issuance of any grading	Prior to issuance of any grading	Review and approval of grading plans		Withhold Grading Permit

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geotechnical report, due to the variable nature of the onsite alluvial soils. This measure shall be implemented to the satisfaction of the City Land Development Division and the City Engineer in consultation with the Project Geologist.	Engineer	permit	permit for development within the Specific Plan			
4.6.6.3C During all grading activities, a geotechnical engineer shall monitor site preparation, removal of unsuitable soils, mapping of all earthwork excavations, approval of imported earth materials, fill placement, foundation installation, and other geotechnical operations. Laboratory testing of subsurface materials to confirm compacted dry density and moisture content, consolidation potential, corrosion potential, expansion potential, and resistance value (R-value) shall be performed prior to and during grading as appropriate. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.	City Engineer and Land Development/Public Works	Once before permitting	Prior to issuance of any discretionary permit for development within the Specific Plan	Review of additional geotechnical and soils site investigations		Withhold Discretionary Permit
4.7 Greenhouse Gases and Global Climate Change						
4.7.6.1A The project shall implement the following requirements to reduce solid waste and greenhouse gas emissions from construction and operation of project development: a) Prior to January 1, 2020, divert a minimum of 50 percent of landfill waste generated by operation of the project. After January 1, 2020, development shall divert a minimum of 75 percent of landfill waste. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis.	Recycling Coordinator/Public Works and City Planning Division	Once each calendar year after project approval	January 1 of each year following project approval	Provide verification sheet to the Planning division. Property Owners Association or the property owner shall certify the percentage of landfill waste		Withholding Future Discretionary Approvals

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<p>b) Prior to January 1, 2020, recycle and/or salvage at least 50 percent of non-hazardous construction and demolition debris. After January 1, 2020, recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis.</p> <p>Develop and implement a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or co-mingled. Calculations can be done by weight or volume, but must be consistent throughout.</p>	City Planning Division	Once each calendar year after project approval	January 1 of each year following project approval	<p>diverted on an annual basis.</p> <p>Certification has been submitted to the City.</p> <p>Property Owners Association or the property owner shall certify the percentage of landfill waste diverted on an annual basis.</p>		Implement Land Use and Enforcement Procedures
<p>c) The applicant shall submit a Recyclables Collection and Loading Area Plan for construction related materials prior to issuance of a building permit with the Building Division and for operational aspects of the project prior to the issuance of the occupancy permit to the Public Works Department. The plan shall conform to the Riverside County Waste Management Department's Design Guidelines for Recyclable Collection and Loading Areas.</p>	City Building and Safety Division	Once before issuance of building permits	Prior to issuance of building permits	Review and approval of a Recyclables Collection and Loading Area plan		Withhold Building Permit
<p>d) Prior to issuance of certificate of occupancy, the recyclables collection and loading area shall</p>	City Planning Division	Once before issuance of	Prior to issuance of	Review and Approval of		Withhold Certificate of

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be constructed in compliance with the Recyclables Collection and Loading Area plan.		occupancy permit	occupancy permit	building plans		Occupancy
e) Prior to issuance of certificate of occupancy, documentation shall be provided to the City confirming that recycling is available for each building.	City Planning Division	Once before issuance of occupancy permit	Prior to issuance of occupancy permit	Compliance with Recyclables Collection and Loading Area plan		Withhold Certificate of Occupancy
f) Within six months after occupancy of a building, the City shall confirm that all tenants have recycling procedures set in place to recycle all items that are recyclable, including but not limited to paper, cardboard, glass, plastics, and metals.	City Planning Division	Within six months of building occupancy	Within six months after occupancy of building	Review and approval of a Recyclables Collection and Loading Area plan.		Withhold Certificate of Occupancy
g) The property owner shall advise all tenants of the availability of community recycling and composting services.	City Planning Division	Once before issuance of a Certificate of Occupancy	Prior to issuance of a Certificate of Occupancy	Written verification will be submitted to the City that the property owner advised all tenants of the availability of community recycling and composting services.		Withhold the Certificate of Occupancy
h) Existing onsite street material shall be recycled for new project streets to the extent feasible.	City Engineer Land Development/ Public Works	Once before issuance of grading permits	Prior to issuance of grading permits	Review and approval of construction documents including street plans		Withhold Grading Permits

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4.8 Hazards and Hazardous Materials						
4.8.6.1A Prior to demolition of any existing structures on the project site, a qualified contractor shall be retained to determine if asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. If asbestos-containing materials and/or lead-based paint are present, prior to commencement of demolition, these materials shall be removed and transported to an appropriate landfill by a licensed contractor. In addition, onsite soils shall be tested for contamination by agricultural chemicals. If present, these materials shall be removed and transported to an appropriate landfill by a licensed contractor. This measure shall be implemented to the satisfaction of the Building Division including written documentation of the disposal of any asbestos-containing materials, lead-based paint, or agricultural chemical residue in conformance with all applicable regulations.	City Building Division	Once Before Permitting and as Needed During Construction	Prior to demolition of any existing rural residences or associated structures	Evidence of qualified contractor provided		Holding and Not Approving Demolition Permits
4.8.6.1B Prior to the issuance of any discretionary permits associated with the proposed fueling facility ("logistic support" site in the LD zone), a risk assessment or safety study that identifies the potential public health and safety risks from accidents at the facility (e.g., fire, tank rupture, boiling liquid, or expanding vapor explosion) shall be submitted to the City for review and approval This study shall be prepared to industry standards and demonstrate that the facility will not create any significant public health or safety impacts or risks, to the satisfaction of the City Building and Safety Division and the Fire Prevention Bureau.	Fire Prevention Bureau and Building and Safety Division	Once Before Permitting	Prior to issuance of any discretionary permits associated with natural gas fueling facility	Review and Approval of Risk Assessment or Safety Study		Withhold Discretionary Permit
4.8.6.1C Prior to grading, for any discretionary	Building Official and	Once before	Prior to	Review and		Withhold

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permits for development in Planning Areas 9-12 adjacent to the natural gas compressor plant, the applicant shall prepare a risk assessment report analyzing safety conditions relative to the existing compressor plant and planned development. The report must be based on appropriate industry standards and identify the potential hazards from the compressor plant (e.g., fire, explosion) and determine that the distance from the plant to the closest planned buildings in Planning Areas 9-12 is sufficient to protect the safety of workers from accidents that could occur (see Final EIR Volume 2 Figure 4.1.6B) at the compressor plant. This measure shall be implemented to the satisfaction of the City Building and Safety Division and the Fire Prevention Bureau.	Fire Marshal	issuance of discretionary permits for development within Planning Areas 9-12	issuance of discretionary permits for development within Planning Areas 9-12	approval of a risk assessment		Discretionary Permit
4.8.6.1D Prior to the issuance of any grading permit, the developer shall inform the City of any existing solid waste materials within the development area. In conjunction with grading activities, all solid waste matter within the development area shall be removed by a licensed contractor and disposed of in an approved landfill. A record of the removal and disposal of any waste materials, in compliance with applicable laws and regulations, shall be submitted to the City prior to the issuance of any building permits.	Recycling Coordinator/Public Works	Once before issuance of grading permits	Prior to issuance of grading permits	Applicant will inform the City in writing of any existing solid waste materials within the development area		Withhold Grading Permit
4.9 Hydrology and Water Quality						
4.9.6.1A Prior to issuance of any building permit within the Specific Plan area, the developer shall construct storm drain pipes and conveyances, as well as, combined detention and infiltration basin(s), bioretention areas, and spreading area(s) within each proposed watershed, as outlined in the project hydrology plan, to mitigate	Land Development/Public Works	Prior to Occupancy	Prior to issuance of any development permit	Review and approval of construction documents Field Inspection		Withhold Building Permit

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<p>the impacts of increased peak flow rate, velocity, flow volume and reduce the time of concentration by storing and infiltrating increased runoff for a limited period of time and release the outflow at a rate that does not exceed the pre-development peak flows and velocities for the 2, 5, 10, 25, and 100-year storms and volumes as assessed in the water balance model for historical conditions. For the purpose of this mitigation measure, the term “construct” shall mean to substantially complete construction so as to function for its intended purpose during construction with complete construction prior to occupancy. Field investigations will be conducted to determine the infiltration rate of soils underlying the proposed locations of bioretention areas and detention basins. The infiltration rate of the underlying soils will be used to properly size the bioretention areas and detention basins/infiltration basins to ensure that adequate volumes of runoff, in cumulative total for all bioretention areas and detention basins are captured and infiltrated. The water balance model will be updated and rerun for the site-specific conditions encountered to confirm the water balance. This measure shall be implemented to the satisfaction of the City Engineer. Energy dissipaters shall be used as the spillways of basins to reduce the runoff velocity and dissipate the flow energy. Drainage weir structures shall be constructed at the downstream end of the watersheds flowing to the San Jacinto Wildlife Area to control the runoff and spread the flow such that the flows exiting the project boundary will return to the sheet flow pattern similar to the existing condition. Detention basins and spreading areas shall be designed to account for the amount of the sediment</p>						

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scraping the bottom of the detention basin, seed or sod to restore groundcover, aerate bottom and dethatch basin bottom (CASQA 2003).						
4.9.6.2A Prior to issuance of any grading permit for development in the World Logistics Center Specific Plan, the project developer shall file a Notice of Intent (NOI) with the Santa Ana Regional Water Quality Control Board to be covered under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of storm water associated with construction activities. The project developer shall submit to the City the Waste Discharge Identification Number issued by the State Water Quality Control Board (SWQCB) as proof that the project's Notice of Intent is to be covered by the General Construction Permit has been filed with the State Water Quality Control Board. This measure shall be implemented to the satisfaction of the City Engineer.	City Engineer, Land Development/ Public Works, and Stormwater Management	Once before issuance of any grading permit	Prior to issuance of any grading permit	Proof of NOI submittal		Withhold Grading Permit
4.9.6.2B Prior to issuance of any grading permit for development in the World Logistics Center Specific Plan, the project developer shall submit to the State Water Quality Control Board (SWQCB) a project-specific Storm Water Pollution Prevention Plan (SWPPP). The Storm Water Pollution Prevention Plan shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the Storm Water Pollution Prevention Plan shall emphasize structural and nonstructural best management practices (BMPs) to control sediment and non-visible discharges from the site. Best Management Practices to be implemented may	City of Moreno Valley and the Regional Water Quality Control Board and Land Development/ Public Works	Once before issuance of any grading permit	Prior to issuance of any grading permit	Written verification of filing a SWPPP by the RWQCB		Withhold Grading Permit

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<p>include (but shall not be limited to) the following:</p> <ul style="list-style-type: none"> Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the Best Management Practices are to be periodically inspected by the Regional Water Quality Control Board during construction, and repairs would be made as required. Materials that have the potential to contribute non-visible pollutants to storm water must not be placed in drainage ways and must be placed in temporary storage containment areas. All loose soil, silt, clay, sand, debris, and other earthen material shall be controlled to eliminate discharge from the site. Temporary soil stabilization measures to be considered include: covering disturbed areas with mulch, temporary seeding, soil stabilizing binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Stockpiles shall be surrounded by silt fences and covered with plastic tarps. The Storm Water Pollution Prevention Plan shall include inspection forms for routine monitoring of the site during the construction phase. Additional required Best Management Practices and erosion control measures shall be documented in the Storm Water Pollution Prevention Plan. 						

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Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<ul style="list-style-type: none"> The Storm Water Pollution Prevention Plan would be kept on site for the duration of project construction and shall be available to the local Regional Water Quality Control Board for inspection at any time. <p>The developer and/or construction contractor for each development area shall be responsible for performing and documenting the application of Best Management Practices identified in the project-specific Storm Water Pollution Prevention Plan. Regular inspections shall be performed on sediment control measures called for in the Storm Water Pollution Prevention Plan. Monthly reports shall be maintained and available for City inspection. An inspection log shall be maintained for the project and shall be available at the site for review by the City of Moreno Valley and the Regional Water Quality Control Board.</p>						
<p>4.9.6.3A Prior to discretionary permit approval for individual plot plans, a site-specific Water Quality Management Plan (WQMP) shall be submitted to the City Land Development Division for review and approval. The Water Quality Management Plan shall specifically identify site design, source control, and treatment control Best Management Practices that shall be used on site to control pollutant runoff and to reduce impacts to water quality to the maximum extent practicable. The Water Quality Management Plan shall be consistent with the Water Quality Management Plan approved for the overall World Logistics Center Specific Plan project. At a minimum, the site developer shall implement the following site design, source control, and treatment control Best Management Practices as</p>	City Land Development Division	Once before issuance of any grading or building permits	Prior to issuance of discretionary permit approval for individual plot plans	Review and Approval of WQMP		Withhold Grading or Building Permit

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>appropriate:</p> <p>Site Design Best Management Practices</p> <ul style="list-style-type: none"> • Minimize urban runoff. • Maximize the permeable area.\ • Incorporate landscaped buffer areas between sidewalks and streets. • Maximize canopy interception and water conservation by planting native or drought-tolerant trees and large shrubs. • Use natural drainage systems. • Where soil conditions are suitable, use perforated pipe or gravel filtration pits for low flow infiltration. • Construct on-site ponding areas or retention facilities to increase opportunities for infiltration consistent with vector control objectives. • Minimize impervious footprint. • Construct streets, sidewalks and parking lot aisles to the minimum widths necessary, provided that public safety and a walkable environment for pedestrians are not compromised. • Reduce widths of street where off-street parking is available. 						

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<ul style="list-style-type: none"> Minimize the use of impervious surfaces such as decorative concrete, in the landscape design. Conserve natural areas. Minimize Directly Connected Impervious Areas (DCIAs). Runoff from impervious areas will sheet flow or be directed to treatment control Best Management Practices. Streets, sidewalks, and parking lots will sheet flow to landscaping/bioretenion areas that are planted with native or drought tolerant trees and large shrubs. <p>Source Control Best Management Practices Source control Best Management Practices are implemented to eliminate the presence of pollutants through prevention. Such measures can be both non-structural and structural:</p> <p><u>Non-structural source control Best Management Practices include:</u></p> <ul style="list-style-type: none"> (a) Education for property owners, operator, tenants, occupants, or employees; (b) Activity restrictions; (c) Irrigation system and landscape maintenance; (d) Common area litter control; 						

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<p>(e) Street sweeping private streets and parking lots; and</p> <p>(f) Drainage facility inspection and maintenance.</p> <p><u>Structural source control Best Management Practices include:</u></p> <p>(g) MS4 stenciling and signage;</p> <p>(h) Landscape and irrigation system design;</p> <p>(i) Protect slopes and channels; and</p> <p>(j) Properly design fueling areas, trash storage areas, loading docks, and outdoor material storage areas.</p> <p>Treatment Control Best Management Practices</p> <p>Treatment control Best Management Practices supplement the pollution prevention and source control measures by treating the water to remove pollutants before it is released from the project site. The treatment control Best Management Practice strategy for the project is to select Low Impact Development (LID) Best Management Practices that promote infiltration and evapotranspiration, including the construction of infiltration basins, bioretention facilities, and extended detention basins. Where infiltration Best Management Practices are not appropriate, bioretention and/or biotreatment Best Management Practices (including extended detention basins, bioswales, and constructed wetlands) that provide opportunity for evapotranspiration and incidental infiltration may be utilized. Harvest and Reuse Best Management Practice will be used to store</p>						

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runoff for later non-potable uses. Site-specific Water Quality Management Plans have not been prepared at this time as no site-specific development project has been submitted to the City for approval. When specific projects within the project are developed, Best Management Practices will be implemented consistent with the goals contained in the Master Water Quality Management Plan. All development within the project will be required to incorporate on-site water quality features to meet or exceed the approved Master Water Quality Management Plan's water quality requirements identified previously.						
4.9.6.3B The Property Owners Association (POA) and all property owners shall be responsible to maintain all onsite water quality basins according to requirements in the guidance Water Quality Management Plan and/or subsequent site-specific Water Quality Management Plans, and established guidelines of the Regional Water Quality Control Board. Failure to properly maintain such basins shall be grounds for suspension or revocation of discretionary operating permits, and/or referral to the Regional Water Quality Control Board for review and possible action. This measure shall be implemented to the satisfaction of the City Land Development Division, in consultation with the City Engineer, and Regional Water Quality Control Board.	City Land Development Division	As Needed	Ongoing	Onsite inspections		Revocation of Discretionary or Operating Permits
4.9.6.3C Prior to issuance of future discretionary permits for any development along the southern boundary of the World Logistics Center Specific Plan (WLCSP), the project developer of such	Land Development Division	Annually	Prior to issuance of discretionary permits for any	Evidence of Annual Water Quality Monitoring Plan fund		Withhold Discretionary Permit

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<p>sites, in cooperation with the Property Owners Association (POA), shall establish and annually fund a Water Quality Mitigation Monitoring Plan (WQMMP) to confirm that project runoff will not have deleterious effects on the adjacent San Jacinto Wildlife Area (SJWA). This program shall include at least quarterly sampling along the southern boundary of the site (i.e., at the identified outlet structures of the project detention basins) during wet season flows and/or when water is present, as well as sampling of any dry-season flows that are observed entering the San Jacinto Wildlife Area property from the project property, including Drainage 9, which is planned to convey only clean off-site flows from north of the World Logistics Center Specific Plan site across Gilman Springs Road. The program shall also include at least twice yearly sampling after completion of construction, and a pre-construction survey must be completed to determine general water quality baseline conditions prior to and during development of the southern portion of the World Logistics Center Specific Plan. This sampling shall be consistent with and/or comply with the requirements of applicable Storm Water Pollution Prevention Plans (SWPPPs) for the development site.</p> <p>The project developer of sites along the southern border of the World Logistics Center Specific Plan shall be responsible for preventing or eliminating any toxic pollutant (not including sediment) found to exceed applicable established public health standards. In addition, the discharge from the project shall not cause or contribute to an exceedance of Receiving Water Quality Objectives for the potential pollutants</p>			development along the southern boundary of the WLCSP			

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associated with the project as identified in Table 4.9.J. Once development is complete, the developer shall retain qualified personnel to conduct regular (i.e., at least quarterly) water sampling/testing of any basins and their outfalls to ensure the San Jacinto Wildlife Area will not be affected by water pollution from the project site. This measure shall be implemented to the satisfaction of the City Land Development Division Manager based on consultation with the project developer, Eastern Municipal Water District, the Regional Water Quality Control Board-Santa Ana Region, and the Mystic Lake Manager.						
4.12 Noise						
4.12.6.1A Prior to issuance of any discretionary project approvals, a Noise Reduction Compliance Plan (NRCP) shall be submitted to and approved by the City. The Noise Reduction Compliance Plan shall show the limits of nighttime construction in relation to any then-occupied residential dwellings and shall be in conformance with City standards. Conditions shall be added to any discretionary projects requiring that the limits of nighttime grading be shown on the Noise Reduction Compliance Plan and all grading plans submitted to the City (per Noise Study MM N-2, pg. 51).	City Planning Division	Once Before Permitting	Prior to issuance of any building or grading permits	Review and Approval of a Noise Reduction Compliance Plan		Withhold Building and Grading Permit
4.12.6.1B All construction equipment, fixed or mobile, shall be equipped with operating and maintained mufflers consistent with manufacturers' standards.	City Planning Division	As Needed During Grading	During site grading and construction	Review of Construction Documents and On-site Inspection		Issuance of a Stop Work Order
4.12.6.1C Construction vehicles shall be prohibited from using Redlands Boulevard south of Eucalyptus Avenue to access on-site construction for all phases of development of the	City Planning Division Transportations	Once before issuance of grading permits or	Prior to any issuance of grading permits or	Review and Approval of Construction Documents		Withhold Grading Permits or approval of

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Specific Plan (per Noise Study MM N-1, pg. 51).	Division/Public Works	approval of roadway and utility improvement plans	approval of roadway and utility improvement plans			roadway and utility improvement plans
4.12.6.1D No grading shall occur within 2,800 feet of residences south of State Route-60 between 8 p.m. and 6 a.m. on weekdays and between 8 p.m. and 7 a.m. on weekends. These restrictions shall be included as part of the Noise Reduction Compliance Plan per Mitigation Measure 4.12.6.1A (per Noise Study MM N-2, pg. 51)	City Planning Division and Land Development/Public Works	Once Before Permitting and On-going during grading	Prior to any discretionary approvals for development in the WLCSP	Review and Approval of Noise Reduction Compliance Plan		Issuance of a Stop Work Order
4.12.6.1E As an alternative to Mitigation Measure 4.12.6.1D, a 12-foot tall temporary construction sound barrier may be installed for residences within 1,580 feet of active nighttime construction areas. The temporary sound barrier shall be constructed of plywood with a total thickness of 15 inches, or a sound blanket wall may be used. If sound blankets are used, they must have a Sound Transmission Class (STC) rating of 27 or greater. This shall be included as part of the Noise Reduction Compliance Plan required in Mitigation Measure 4.12.6.1A, which shall be reviewed and approved by the City prior to implementation (per Noise Study MM N-2 and N-3, pg. 51 and pg. 52).	City Planning Division	Once Before Permitting	Prior to grading	Review and Approval of Noise Reduction Compliance Plan		Withhold Grading and Building Permits
4.12.6.1F As an alternative to Mitigation Measure 4.12.6.1D and 4.12.6.1E, on-site noise measurements of construction areas may be taken by qualified personnel and specific buffer distances between construction activities and existing residences may be proposed based on actual noise levels. These measurements will be incorporated into the Noise Reduction	City Planning Division	Once Before Permitting	Prior to grading	Review and Approval of Noise Reduction Compliance Plan		Withhold Grading and Building Permits

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Compliance Plan required in Mitigation Measure 4.12.6.1A, which shall be reviewed and approved by the City prior to implementation (per Noise Study MM N-2, pg. 51).						
4.12.6.1G Any discretionary approvals for development that proposes grading within 1,580 feet of occupied residential units shall require that all grading equipment be equipped with residential grade mufflers (or better). All stationary construction equipment shall be placed so that emitted noise is directed away from noise-sensitive receptors nearest the site. Additionally, stationary construction equipment shall have all standard acoustic covers in place during operation (per Noise Study MM N-4, pg. 52).	City Planning Division	As Needed During Grading	Prior to any discretionary approvals for development that proposes grading within 1,580 feet of occupied residential units	Review and Approval of Construction Documents. Require Written Materials from the Applicant or Operator		Issuance of a Stop Work Order
4.12.6.1H All material stockpiles in connection with any grading operations shall be located at least 1,200 feet from existing residences (per Noise Study MM N-5, pg. 52).	City Planning Division and Land Development/Public Works	As Needed During Grading	During Grading	On-site Inspection		Issuance of a Stop Work Order
4.12.6.1I All project-related off-site construction shall be limited to 6 a.m. and 8 p.m. on weekdays only. Construction during weekends and City holidays shall not be permitted (per Noise Study MM N-6, pg. 53) to the satisfaction of the Land Development Division/Public Works.	City Land Development Division/Public Works	On-going as needed	During construction	Review and Approval of Construction Documents		Issuance of a Stop Work Order
4.12.6.1J Prior to issuance/approval of any grading permits, off-site construction activities adjacent to residential uses shall provide for installation of 12-foot temporary sound barriers for construction activities lasting more than one month. The sound barrier will reduce noise levels by approximately 10 dB. The temporary sound barrier may be constructed of plywood with a total thickness of 1.5 inches, or a sound blanket	City Planning Division	Once before issuance of grading permits	Prior to the issuance of grading permits	Evidence of off-site 12-foot temporary sound barrier during construction activities lasting more than 1 month		Withhold Grading Permit

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wall may be used. If sound blankets are used, the curtains must have a Sound Transmission Class (STC) rating of 27 or greater. No off-site construction is permitted during weekday nighttime hours (8 p.m. to 6 a.m.) or during weekends and City holidays except for emergencies (per Noise Study MM N-7, pg. 53).						
<p>4.12.6.2A When processing future individual buildings under the World Logistics Center Specific Plan, as part of the City's approval process, the City shall require the Applicant to take the following three actions for each building prior to approval of discretionary permits for individual plot plans for the requested development:</p> <p>Action 1: Perform a building-specific noise study to ensure that the assumptions set forth in the FEIR prepared for the programmatic level entitlement remain valid. These procedure used to conduct these noise analyses shall be consistent with the noise analysis conducted in the programmatic FEIR and shall be used to impose building-specific mitigation on the individually-proposed buildings.</p> <p>Action 2: If the building-specific analyses identify that the proposed development triggers the need for mitigation from the proposed building, including all preceding developments in the specific plan area, the Applicant shall implement the mitigation identified in the WLC FEIR. Prior to implementing the mitigation, the Applicant shall send letters by registered mail to all property owners and non-owner occupants of properties that would benefit from the proposed mitigation asking them to provide a position either in favor</p>	City Planning Division	Once before issuance of a certificate of occupancy	Prior to issuance of discretionary permits for Action 1. Prior to issuance of certificate of occupancy for actions 2 and 3	Review and approval of a noise study		Withhold Certificate of Occupancy

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<p>of or in opposition to the proposed noise abatement mitigation within 45 days. Each property shall be entitled to one vote on behalf of owners and one vote per dwelling on behalf of non-owner occupants.</p> <p>If more than 50% of the votes from responding benefited receptors oppose the abatement, the abatement will not be considered reasonable. Additionally, for noise abatement to be located on private property, 100% of owners of property upon which the abatement is to be placed must support the proposed abatement. In the case of proposed noise abatement on private property, no response from a property owner, after three attempts by registered mail, is considered a <i>no</i> vote.</p> <p>At the completion of the vote at the end of the 45 day period, the Applicant shall provide the tentative results of the vote to all property owners by registered mail. During the next 15 calendar days following the date of the mailing, property owners may change their vote. Following the 15-day period, the results of the vote will be finalized and made public.</p> <p>Action 3: Upon consent from benefited receptors and property owners, the Applicant shall post a bond for the cost of the construction of the necessary mitigation as estimated by the City Engineer to ensure completion of the mitigation. The certificate of occupancy permits shall be issued upon posting of the bond or demonstration that 50% of the votes from responding benefited receptors oppose the abatement or, if the abatement is located on</p>						

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private property, any property owners oppose the abatement (per Noise Study MM N-8, pg.53).						
4.12.6.2B Prior to issuance/approval of any building permits, the centerline of Cactus Avenue Extension will be located no closer than 114 feet to the residential property lines along Merwin Street. An alternative is to locate the roadway closer to the residences and provide a soundwall along Cactus Avenue Extension. The soundwall location and height should be determined by a Registered Engineer, and the soundwall shall be designed to reduce noise levels to less than 65 CNEL at the residences. The Engineer shall provide calculations and supporting information in a report that will be required to be submitted to and approved by the City prior to issuing permits to construct the road (per Noise Study, pg. 51, Cactus Avenue Extension, ID #50).	City Planning Division	Prior to the approval of a building permit	Prior to the issuance of any discretionary approvals for development in the WLCSP	Review and Approval of discretionary permits		Withhold Discretionary Permits
4.12.6.2C Prior to the approval of any discretionary permits, cumulative impact areas shown in the WLC EIR Noise Study shall be included in the soundwall mitigation program outlined in Mitigation Measures 4.12.6.2A and 4.12.6.2D (per Noise Study MM N-9, pg. 62).	City Planning Division	Once before issuance of building permits	Prior to issuance of building permits	Review and approval of soundwall mitigation program		Withhold Building Permit
4.12.6.2D Prior to issuance of a building permit, the applicant shall demonstrate that the development maintains a buffer with soundwall for noise attenuation at residential/warehousing interface (i.e., western and southwestern boundaries of the project site). To keep the noise levels at nearby residential areas less than typical ambient conditions, the warehousing property line shall be located a minimum of 250 feet from the residential zone boundary , and a 12-foot noise barrier shall be located along the	City Planning Division	Once before issuance of building permits	Prior to issuance of building permits	Review and approval of building plans		Withhold Building Permit

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perimeter of the property that faces any residential areas. The 12 foot noise barrier may be a soundwall, berm, or combination of the two. The height shall be measured relative to the pad of the warehouse. This requirement shall be implemented anytime residential areas are within 600 feet of the warehousing property line to insure that a noise level of 45 dBA (Leq) will not be exceeded at the residential zone. This requirement is consistent with Item 10 of Municipal Code Section 9.16.160 Business park/industrial that states, "All manufacturing and industrial uses adjacent to residential land uses shall include a buffer zone and/or noise attenuation wall to reduce outside noise levels" (per Noise Study MM N-10, pg.62).						
4.12.6.4A Prior to the issuance of building permits for projects within 1,300 feet of the Southern California Gas Company (SCGC) and San Diego Gas and Electric (SDG&E) blow-down facilities, documentation shall be submitted to the City confirming that sound attenuation devices and/or improvements for the blow-down facilities providing at least a 40 dB reduction in noise levels during blow-down events are available and will be installed for all planned blow-down events. It shall be the responsibility of the developer to fund all sound attenuation improvements to the blow-down facilities required by this measure. It shall also be the responsibility of the developer to coordinate with San Diego Gas and Electric and/or Southern California Gas Company regarding the installation of any sound attenuation devices or improvements on the blow-down facilities at either the San Diego Gas and Electric compressor station or the Southern California Gas Company pipelines. This measure	City Land Development Division	Once before Permitting	Prior to the issuance of building permits for projects within 1,300 feet of the SCGC and SDG&E facilities	Review and Approval of documentation confirming sound attenuation device		Withhold Building Permits

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shall be implemented to the satisfaction of the City Land Management Division (per Noise Study MM N-11, pg.65).						
4.15 Traffic and Circulation						
4.15.7.4A A traffic impact analysis ("TIA") conforming to the guidelines for traffic impact analysis adopted by the City shall be submitted in conjunction with each Plot Plan application within the World Logistics Center Specific Plan. Prior to the approval of the Plot Plan, the City shall review the traffic impact analysis to determine if any of the traffic improvements listed in Final EIR Volume 2 Tables 4.15.AV through 4.15.BA (TIA Tables 74 through 79) of the traffic impact analysis prepared for the Program Environmental Impact Report are required to be completed prior to the issuance of a certificate of occupancy for each building. If the City determines that any of the improvements within Moreno Valley are required to be constructed in order to ensure that the traffic impacts which will result from the construction and operation of the building will be mitigated into insignificance, then the completion of construction of the improvements prior to the issuance of a Certificate of Occupancy for the building shall be made a Condition of Approval of the Plot Plan. Construction of improvements within the City shall be subject to credit/reimbursement agreement for those DIF and/or TUMF eligible costs. If the City determines that any of the improvements outside Moreno Valley are required to be constructed in order to ensure that the traffic impacts which will result from the construction and operation of the building will be mitigated to a less than significant level, then the payment of any necessary fair	City Engineer	Once before plot plan approval	Prior to plot plan approval	Review and Approval of sight specific TIAs		Withhold Building Permits

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share contribution as prescribed in Mitigation Measure 4.15.7.4G prior to the issuance of a Certificate of Occupancy for the building shall be made a Condition of Approval of the Plot Plan. If the City determines that the traffic impacts which will result from the construction or operation of a building will be significantly more adverse than those shown in the Program Environmental Impact Report, further environmental review shall be conducted prior to the approval of the Plot Plan pursuant to Public Resources Code § 21166 and CEQA Guidelines § 15162 to determine what additional mitigation measures, if any, will be required in order to maintain the appropriate levels of service.						
4.15.7.4B As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require the dedication of appropriate right-of-way consistent with the Subdivision Map Act for frontage street improvements contained within the World Logistics Center Specific Plan Circulation Map, as shown in this Program EIR Figure 3-10 (or Figure 22 in the TIA prepared for this Program EIR). Required dedications shall be made prior to the issuance of occupancy permits for the requested development.	City Engineer	Once before issuance of occupancy permits	Prior to issuance of occupancy permits	Evidence of dedication of right-of-way in compliance with Subdivision Map Act		Withhold Occupancy Permits
4.15.7.4C As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require each project to pay the Development Impact Fee (DIF) as set forth in Municipal Code Chapter 3.42. Required DIF payments shall be made prior to the issuance of occupancy permits for the requested	City Engineer	Once before to issuance of occupancy permits	Prior to issuance of occupancy permits	Written verification of payment of DIF		Withhold Occupancy Permits

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development.						
4.15.7.4D As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require each project to pay the requisite Transportation Uniform Mitigation Fee (TUMF) as set forth in Municipal Code Sections 3.55.050 and 3.55.060. Required TUMF payments shall be made prior to the issuance of occupancy permits for the requested development.	City Engineer	Once before to issuance of occupancy permits	Prior to issuance of occupancy permits	Written verification of payment of TUMF		Withhold Occupancy Permits
4.15.7.4E In order to ensure that all of the Project's traffic impacts are mitigated to the greatest extent feasible, the Applicant shall contribute its fair share of the cost of the needed traffic improvements that are not within the City as identified in the World Logistic Center Specific Plan Traffic Impact Analysis (i.e., under the jurisdiction of other cities, the County of Riverside or Caltrans, pursuant to Mitigation Measure 4.15.7.4F). As used in this mitigation measure, the Applicant's "fair share" has been determined in compliance with the requirements of the Fee Mitigation Act, Government Code § 66000 et seq., and, pursuant to § 66001(g), does not require that the Applicant be responsible for making up for any existing deficiencies. For example, the intersection of Martin Luther King Blvd. and the I-215 northbound ramps (Intersection 85) in the City of Riverside was identified as a place where the World Logistic Center contributes to cumulatively significant impacts, and where the fair share contribution of the World Logistic Center project as a whole was	City Engineer	Once before to issuance of occupancy permits	Prior to issuance of occupancy permits	Written verification of payment of DIF or TUMF		Withhold Occupancy Permits

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<p>computed to be 6.2%. If the City of Riverside establishes a fair share contribution program consistent with this Mitigation Measure 4.15.7.4F to improve that intersection, then when a certificate of occupancy is to be issued for a 2-million square feet high-cube warehouse in the World Logistic Center (approximately 5% of the entire World Logistic Center project) the amount of the fair share payment due from the Applicant to the City of Riverside would be computed as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">Amount Due</td> <td style="width: 10%;">=</td> <td style="width: 10%;">Total cost of Improvement</td> <td style="width: 10%;">X</td> <td style="width: 10%;">Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis</td> <td style="width: 10%;">X</td> <td style="width: 10%;">% attributable to the building that is subject to the certificate of occupancy (5%)</td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td> $A \times B \times C = D$ A= % attributable to the building that is subject to the certificate of occupancy (5%) B= Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis C= Total cost of Improvement D= Amount Due </td> </tr> </table> <p>A similar calculation would be done for each</p>	Amount Due	=	Total cost of Improvement	X	Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis	X	% attributable to the building that is subject to the certificate of occupancy (5%)	$A \times B \times C = D$ A= % attributable to the building that is subject to the certificate of occupancy (5%) B= Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis C= Total cost of Improvement D= Amount Due						
Amount Due	=	Total cost of Improvement	X	Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis	X	% attributable to the building that is subject to the certificate of occupancy (5%)								
$A \times B \times C = D$ A= % attributable to the building that is subject to the certificate of occupancy (5%) B= Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis C= Total cost of Improvement D= Amount Due														

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
subsequent building, with payments for each due at the time of issuance of the certificate of occupancy. As a result, while each building individually would not produce a significant impact, and therefore would not be required to pay any mitigation fees if considered by itself, the total amount of the payments for all of the buildings would be equal to the fair share payment for the entire World Logistic Center to the extent that the responsible jurisdiction has chosen to adopt a fair share contribution funding program consistent with Mitigation Measure 4.15.7.4F.						
4.15.7.4F The Applicant shall pay a portion of the fair share of the cost of traffic improvements identified in the Transportation Impact Analysis for those significantly impacted road segments and intersections for each warehouse building within the World Logistics Center if the impacted jurisdiction has established a fair share contribution program prior to the approval of a building-specific plot plan. The City shall determine whether a fair share program exists in the impacted jurisdiction and, if one does exist, require that the appropriate fees are paid by the Applicant, consistent with the requirements below, prior to the issuance of a certificate of occupancy for the building in question. If no fair share program exists or if the existing programs are not consistent with the requirements below, then no payment of fees shall be required. The impacts are to be determined on a road segment or intersection basis. Nothing in this condition requires the payment of a traffic impact fee imposed by another jurisdiction which covers improvement to facilities where the project does not have a significant impact. Fair-share	City Engineer	Once prior to issuance of building permits for individual buildings.	Prior to issuance of occupancy permits	Written verification of payment of fair-share fees		Withhold Occupancy Permits

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
contributions will be determined on a building-by-building basis as a share of the impact of the Project as a whole (for each segment or intersection where the World Logistics Center project as a whole has a significant impact identified in the Programmatic Environmental Impact Report) as determined by the Traffic Impact Analysis and will be due as each certificate of occupancy is issued. The fair share payments for the significantly impacted road segments and intersections identified in the Programmatic Environmental Impact Report will be required even though the impact resulting from a specific building does not, by itself, cause a significant impact.						
4.15.7.4G City shall work directly with Western Riverside Council of Governments to request that Transportation Uniform Mitigation Fee funding priorities be shifted to align with the needs of the City, including improvements identified in the World Logistics Center Specific Plan traffic impact analysis. Toward this end, City shall meet regularly with Western Riverside Council of Governments.	City Engineer	On-going	Yearly starting with project up and ending with project buildout.	City Engineer provides quarterly updates to the City Council regarding TUMF funding priorities as it relates to the improvements identified in the traffic impact analysis.		None
4.16 Utilities and Services Systems						
4.16.1.6.1A Prior to approval of a precise grading permit for each plot plan for development within the World Logistics Center Specific Plan (WLCSP), the developer shall submit landscape plans that demonstrate compliance with the World Logistics Center Specific Plan, the State of California Model Water Efficient Landscape Ordinance (AB 1881), and Conservation in Landscaping Act (AB 325). This measure shall	Land Development Division/Public Works	Prior to the approval of a building permit	Prior recordation of Final Map	Review and Approval of Landscape Plans		Withhold Grading Permit

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>be implemented to the satisfaction of the Planning Division. Said landscape plans shall incorporate the following:</p> <ul style="list-style-type: none"> • Use of xeriscape, drought-tolerant, and water-conserving landscape plant materials wherever feasible and as outlined in Section 6.0 of the World Logistics Center Specific Plan; • Use of vacuums, sweepers, and other “dry” cleaning equipment to reduce the use of water for wash down of exterior areas; • Weather-based automatic irrigation controllers for outdoor irrigation (i.e., use moisture sensors); • Use of irrigation systems primarily at night or early morning, when evaporation rates are lowest; • Use of recirculation systems in any outdoor water features, fountains, etc.; • Use of low-flow sprinkler heads in irrigation system; • Provide information to the public in conspicuous places regarding outdoor water conservation; and • Use of reclaimed water for irrigation if it becomes available. 						

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>4.16.1.6.1B All buildings shall include water-efficient design features outlined in Section 4.0 of the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development Division/Public Works. These design features shall include, but not be limited to the following:</p> <ul style="list-style-type: none"> • Instantaneous (flash) or solar water heaters; • Automatic on and off water facets; • Water-efficient appliances; • Low-flow fittings, fixtures and equipment; • Use of high efficiency toilets (1.28 gallons per flush [gpf] or less); • Use of waterless or very low water use urinals (0.0 gpf to 0.25 gpf); • Use of self-closing valves for drinking fountains; • Infrared sensors on drinking fountains, sinks, toilets and urinals; • Low-flow showerheads; • Water-efficient ice machines, dishwashers, clothes washers, and other water-using appliances; • Cooling tower recirculating system where applicable; • Provide information to the public in conspicuous places regarding indoor water conservation; and • Use of reclaimed water for wash down if it 	Land Development Division/Public Works	Once before issuance of Building Permit	Prior to issuance of any building permit	Review and Approval of Building Plans		Withhold Building Permit

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
becomes available.						
4.16.1.6.1C Prior to approval of a precise grading permit for each plot plan, irrigation plans shall be submitted to and approved by the City demonstrating that the development will have separate irrigation lines for recycled water. All irrigation systems shall be designed so that they will function properly with recycled water if it becomes available. This measure shall be implemented to the satisfaction of the City Planning Division and Land Development Division/Public Works.	City Planning Division Land Development Division/Public Works	Prior to the approval of a building permit	Prior recordation of Final Map	Review and Approval of Irrigation Plans		Withhold Grading Permit
4.16.1.6.2A Each Plot Plan application for development shall include a concept grading and drainage plan, with supporting engineering calculations. The plans shall be designed such that the existing sediment carrying capacity of the drainage courses exiting the project area is similar to the existing condition. The runoff leaving the project site shall be comparable to the sheet flow of the existing condition to maintain the sediment carrying capacity and amount of available sediment for transport so that no increased erosion will occur downstream. This measure shall be implemented to the satisfaction of the City Land Development Division/Public Works.	Land Development Division/Public Works	Once Concurrent with Plot Plan review and approval.	Prior to issuance of grading permit.	Review and Approval of Grading and Drainage Plans		Withhold Grading Permit.
4.16.4.6.1A Each application for a building permit shall include energy calculations to demonstrate compliance with the California Energy Efficiency Standards confirming that each new structure meets applicable Building and Energy Efficiency Standards. The plans shall also ensure that buildings are in conformance with the State Energy Conservation Efficiency	City Building and Safety Division and Planning Division	Once prior to issuance of building permit. Once during on-site inspection	Prior to issuance of building permit.	Review of construction documents and on-site inspection		Withhold Building Permit. Or Withhold Occupancy Permit

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>Standards for Nonresidential buildings (Title 24, Part 6, Article 2, California Administrative Code). This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions. Plans shall show the following:</p> <p>Energy-efficient roofing systems, such as “cool” roofs, that reduce roof temperatures significantly during the summer and therefore reduce the energy requirement for air conditioning.</p> <p>Cool pavement materials such as lighter-colored pavement materials, porous materials, or permeable or porous pavement, for all roadways and walkways not within the public right-of-way, to minimize the absorption of solar heat and subsequent transfer of heat to its surrounding environment.</p> <p>Energy-efficient appliances that achieve the 2008 Appliance Energy Efficiency Standards (e.g., EnergyStar Appliances) and use of sunlight-filtering window coatings or double-paned windows.</p>						
<p>4.16.4.6.1B Prior to the issuance of any building permits within the World Logistics Center Specific Plan, each project developer shall submit energy calculations used to demonstrate compliance with the performance approach to the California Energy Efficiency Standards to the Building and Safety and Planning Divisions that shows each new structure meets the applicable Building and Energy Efficiency Standards. Plans may include but are not necessarily limited to implementing the following as appropriate:</p>	City Building and Safety Division and Planning Division	Once prior to issuance of building permit.	Prior to issuance of building permit.	Review of construction documents and on-site inspection		Withhold Building Permit.

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>High-efficiency air-conditioning with electronic management system (computer) control.</p> <p>Variable Air Volume air distribution.</p> <p>Outside air (100 percent) economizer cycle.</p> <p>Staged compressors or variable speed drives to flow varying thermal loads.</p> <p>Isolated High-efficiency air-conditioning zone control by floors/separable activity areas.</p> <p>Specification of premium-efficiency electric motors (i.e., compressor motors, air handling units, and fan-coil units).</p> <p>Use of occupancy sensors in appropriate spaces.</p> <p>Use of compact fluorescent lamps in place of incandescent lamps.</p> <p>Use of cold cathode fluorescent lamps.</p> <p>Use of Energy Star exit lighting or exit signage.</p> <p>Use of T-8 lamps and electronic ballasts where applications of standard fluorescent fixtures are identified.</p> <p>Use of lighting power controllers in association with metal-halide or high-pressure sodium (high intensity discharge) lamps for outdoor lighting and parking lots.</p> <p>Use of skylights (may conflict with installation of solar panels in some instances).</p>						

3.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: World Logistics Center Specific Plan

Applicant: Highland Fairview

Date: May 2015

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
Consideration of thermal energy storage air conditioning for spaces or hotel buildings, meeting facilities, theaters, or other intermittent-use spaces or facilities that may require air-conditioning during summer, day-peak periods.						
<p>4.16.4.6.1C Prior to the issuance of a building permit, new development shall demonstrate that each building has implemented the following:</p> <p>1) Install solar panels with a capacity equal to the peak daily demand for the ancillary office uses in each warehouse building;</p> <p>2) Increase efficiency for buildings by implementing either 10 percent over the 2008 Title 24's energy saving requirements or the Title 24 requirements in place at the time the building permit is approved, whichever is more strict; and</p> <p>3) Require the equivalent of "Leadership in Energy and Environmental Design Certified" for the buildings constructed at the World Logistics Center based on Leadership in Energy and Environmental Design Certified standards in effect at the time of project approval.</p> <p>This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions.</p>	Building and Safety Division and Planning Division	Once before issuance of building permit.	Prior to the issuance of any building permits	Submittal of energy calculations that show compliance with the California Energy Efficiency Standards		Withhold Building Permit

RESOLUTION NO. 2015-57

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MORENO VALLEY CALIFORNIA APPROVING PA12-0010 (GENERAL PLAN AMENDMENTS) FOR THE PROPOSED WORLD LOGISTIC CENTER PROJECT TO INCLUDE LAND USE CHANGES FOR PROPERTY WITHIN THE WORLD LOGISTICS CENTER SPECIFIC PLAN AREA TO BUSINESS PARK/LIGHT INDUSTRIAL (BP) AND OPEN SPACE (OS) AND PROPERTIES OUTSIDE OF THE WORLD LOGISTICS CENTER SPECIFIC PLAN TO OPEN SPACE (OS) AND CORRESPONDING GENERAL PLAN ELEMENT GOALS AND OBJECTIVES TEXT AND MAP AMENDMENTS TO THE COMMUNITY DEVELOPMENT, CIRCULATION, PARKS, RECREATION AND OPEN SPACE, SAFETY, AND CONSERVATION ELEMENTS

WHEREAS, the applicant, Highland Fairview, has filed an application for the approval of a General Plan Amendment (PA12-0010) to include General Plan Land Use Amendments to Business Park/Light Industrial (BP) and Open Space (OS) land use designations as well as various amendments to Elements of the General Plan, including Community Development, Circulation, Parks, Recreation and Open Space, Safety and Conservation for the 3,818 acre project area, which includes an approximate 2,610 acre portion of land for the proposed World Logistics Center Specific Plan and approximately 1,104 acres of land outside and to the south of the proposed World Logistics Center Specific Plan area; and

WHEREAS, The General Plan Amendment is being processed concurrent with applications for an Environmental Impact Report (EIR) (P12-016), Development Agreement (PA12-0011), Change of Zone (PA12-0012), Specific Plan (PA12-0013), Tentative Parcel Map No. 36457 (PA12-0013), Pre zoning/Annexation (PA12-0014) for 85 acres currently within the jurisdiction of the County of Riverside at the northwest corner of Gilman Springs and Alessandro Boulevard, and a Development Agreement (PA12-0011) All of the discretionary applications are related but approved by separate resolutions and ordinances with separate findings; and

WHEREAS, on June 11, 2015, June 25, 2015 and June 30, 2015, the Planning Commission of the City of Moreno Valley held meetings to consider the project. At said meeting, the Planning Commission recommended approval of the proposed General Plan Amendments to the City Council.

WHEREAS, on July 15, 2015 the City Council of the City of Moreno Valley held a public hearing to consider the proposed General Plan Amendments; and

WHEREAS, all legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, BE IT HEREBY FOUND, DETERMINED AND RESOLVED by the City Council of the City of Moreno Valley as follows:

- A. This City Council hereby specifically finds that all of the facts set forth above in this Resolution are true and correct.
- B. Based upon substantial evidence presented to this City Council during the above-referenced meeting on July 15, 2015, including written and oral staff reports, and the record from the public hearing, this Planning Commission hereby specifically finds as follows:
 1. **Conformance with General Plan Policies** – The proposed amendments are consistent with the General Plan, and its goals, objectives, policies and programs

FACT: The proposed project will result in a significant shift in land use policy in the project area which involves a significant portion of eastern Moreno Valley; however, aside from the land use policy change the proposed general plan amendments are considerate of the collective goals and objectives of the full General Plan which are intended to set forth a comprehensive long-term strategy for the physical development that would result in a safe, healthful, prosperous and desirable place to live, work and play. The proposed General Plan Amendment will designate 2,610 acres for primarily logistics development and 1,104 acres for permanent open space. Approximately 104 additional acres will be used for off-site utility extensions to serve the proposed World Logistics Center project. The proposed amendment will result in a reduction in residential zoning and is consistent with the updated 2014 General Plan Housing Elements.
 2. **Health, Safety and Welfare** – The proposed amendments will not be detrimental to the public health, safety or welfare or materially injurious to properties or improvements in the vicinity.

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Resolution No. 2015 -57
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FACT: An Environmental Impact report (EIR) has been prepared for the overall project, including the proposed Change of Zone, General Plan amendment and Specific Plan. The analysis presented in the EIR indicates that the proposed project will have certain significant unavoidable adverse impacts to Aesthetics, Air Quality Land Use, Noise, and Traffic/Circulation as described in detail within the document. All other environmental effects evaluated in the EIR are considered to be less than significant, or can be feasibly reduced with mitigation measures to less than significant levels. A Mitigation Monitoring Program, which will ensure the completion of required mitigation measures for the project is included in the EIR.

A Statement of Overriding Considerations has been prepared in consideration of project impacts related to Aesthetics, Air Quality, Land Use, Noise, and Transportation/Traffic that cannot be mitigated to a less than significant level.

Mitigation measures for air quality include measures such as the required inclusion of Tier 4 construction equipment, restriction of trucks that fall below 2010 engine emissions standards from entering project areas and limitation of truck idling to three (3) minutes, all in an effort to reduce air pollutant emissions. Mitigation measures for Noise include the reduction of short-term construction noise levels to include the requirement of a Noise Reduction Compliance Plan, restrictions on grading during nighttime hours, potential sound barriers, as well as measures for long term traffic and operation noise to include building specific noise studies required for individual plot plans, the potential for sound walls and maintenance of buffer areas.

The Specific Plan provides for special edge treatment areas surrounding the perimeter of the proposed World Logistics Center Specific Plan boundary that provides a 250 foot buffer between the Specific Plan development area and adjacent areas such as along Gilman Springs Road and the western edge adjacent to Redlands Boulevard. Buildings, truck courts loading areas, truck circulation areas or truck/trailer storage uses would not be allowed within the buffer areas. In addition, buildings would not be allowed from a 400 foot buffer that is proposed from the San Jacinto Wildlife boundary. Said

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Resolution No. 2015 -57
Date adopted: July 15, 2015

mitigation measures, including buffering and screening of any industrial development and design of the Specific Plan to include restrictions of truck traffic into existing residential neighborhoods to the west will lessen environmental impacts for any existing or future sensitive receptor properties within the general vicinity of the proposed development and assist to reduce impacts to public health, safety and welfare.

BE IT FURTHER RESOLVED that the City Council **HEREBY APPROVES** Resolution No. 2015-____, **APPROVING** a General Plan Amendment (PA12-0010) to include General Plan Land Use Amendments for Business Park/Light Industrial (BP) and Open Space (OS) land use designations as well as various amendments to elements of the General Plan, including Community Development, Circulation, Parks, Recreation and Open Space, Safety and Conservation for the 3,818 acre project area, including an approximate 2,610 acre portion of land covering the World Logistics Center Project Specific Plan and land included outside and to the south of the World Logistics Center Specific Plan, as documented in Exhibits A through M, attached to this resolution, and based on the affirmative recommendation of the Certification and Adoption of the Environmental Impact Report Mitigation Monitoring Program and Statement of Overriding Considerations.

APPROVED and ADOPTED this _____ day of July, 2015.

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Resolution No. 2015 -57
Date adopted: July 15, 2015

Attachment: Proposed Resolution_GPA [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

Mayor of the City of Moreno Valley

ATTEST:

City Clerk

APPROVED AS TO FORM:

City Attorney

Attached: Proposed Land Use Map and General Plan Map and Text Amendments

5
Resolution No. 2015 -57
Date adopted: July 15, 2015

Attachment: Proposed Resolution_GPA [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

RESOLUTION JURAT

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF MORENO VALLEY)

I, Jane Halstead, City Clerk of the City of Moreno Valley, California, do hereby certify that Resolution No. 2015-57 was duly and regularly adopted by the City Council of the City of Moreno Valley at a regular meeting thereof held on the 15th day of July, 2015 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

(Council Members, Mayor Pro Tem and Mayor)

CITY CLERK

(SEAL)

6
Resolution No. 2015 -57
Date adopted: July 15, 2015

Attachment: Proposed Resolution_GPA [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

WORLD LOGISTICS CENTER Proposed Text Amendments to the General Plan

(NOTE: Text to be added is shown underlined, text to be deleted is shown ~~strikeout~~)

CHAPTER 2 – Community Development Element

Page 2-5

Revise Section 2.1.3:

“...at the intersection of Virginia Street and Gato del Sol. ~~The acquisitions encompass about one-third of the land within the Moreno Highlands Specific Plan.~~

~~Neither of the aforementioned land purchases are likely to be developed as envisioned in the original specific plan and are likely to remain substantially vacant. In that the Moreno Highlands Specific Plan Development Agreement precludes the City from making unilateral changes to the specific plan lands use plan, no changes were recommended for the Moreno Highland Specific Plan as part of the General Plan Update.”~~

CHAPTER 5 – Circulation Element

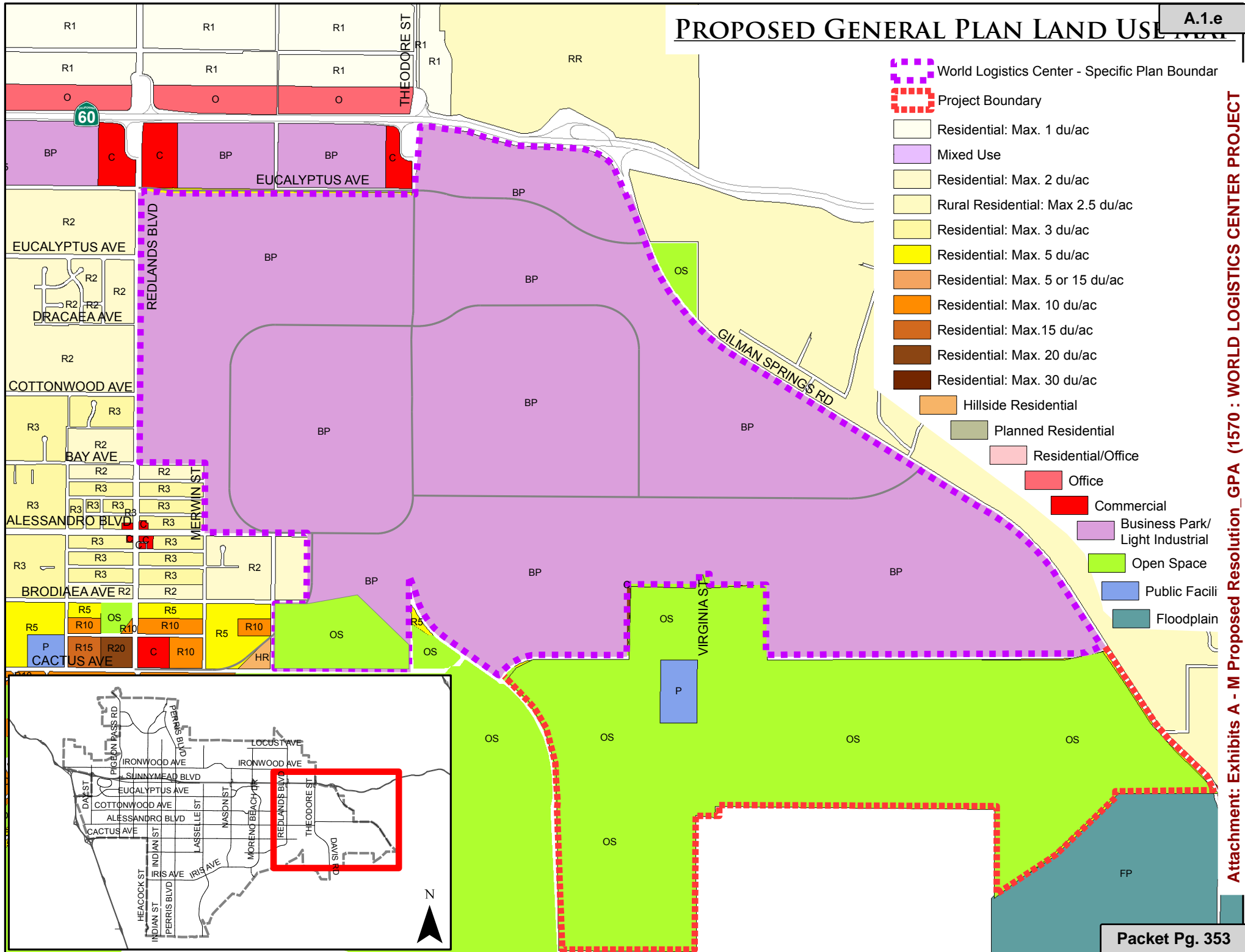
Page 5-7

Revise Section 5.3.2.2:

”Industrial and business park development is concentrated in the southern part of the City, generally located south of Iris Avenue and north of San Michele Road to the Perris city limits, and in the eastern part of the City, generally between Redlands Blvd. and Gilman Springs Road. This development is an important component of the City land use pattern....”

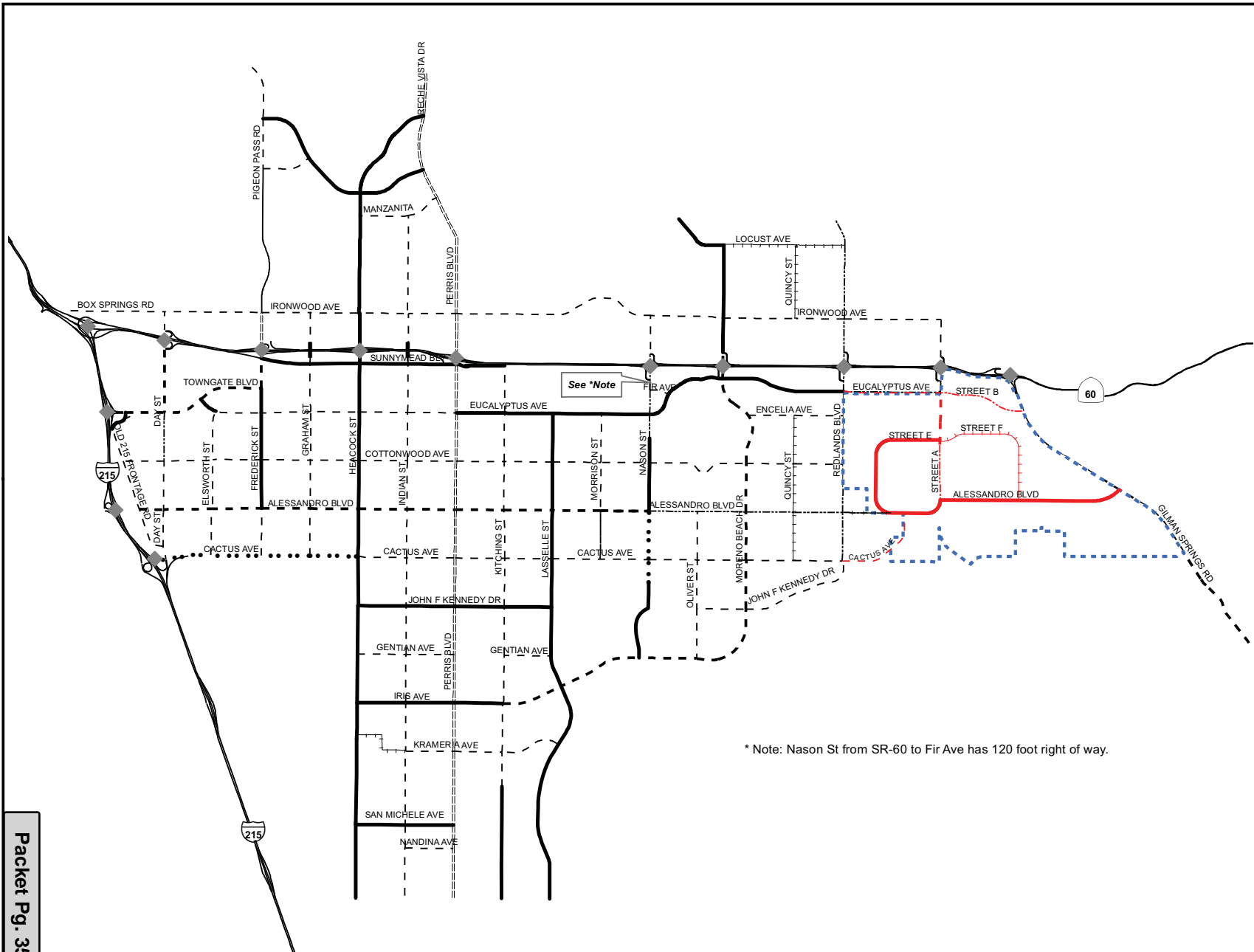
PROPOSED GENERAL PLAN LAND USE

A.1.e

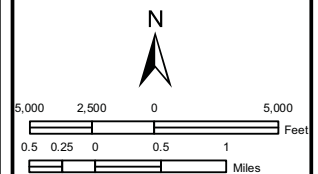


Attachment: Exhibits A - M Proposed Resolution_GPA (1570) : WORLD LOGISTICS CENTER PROJECT

**FIGURE 9-1
CIRCULATION PLAN**



- Street Classification**
- ==== Freeway
 - - - Divided Major Arterial
 - ... Divided Major Arterial - Reduced Cross Section
 - ==== Divided Arterial - 6 lane
 - - - - Divided Arterial - 4 lane
 - Arterial
 - - - Minor Arterial
 - Minor Arterial - Pigeon Pass Cross Section
 - Collector
 - Freeway Overpass
 - ◆ Freeway Interchange



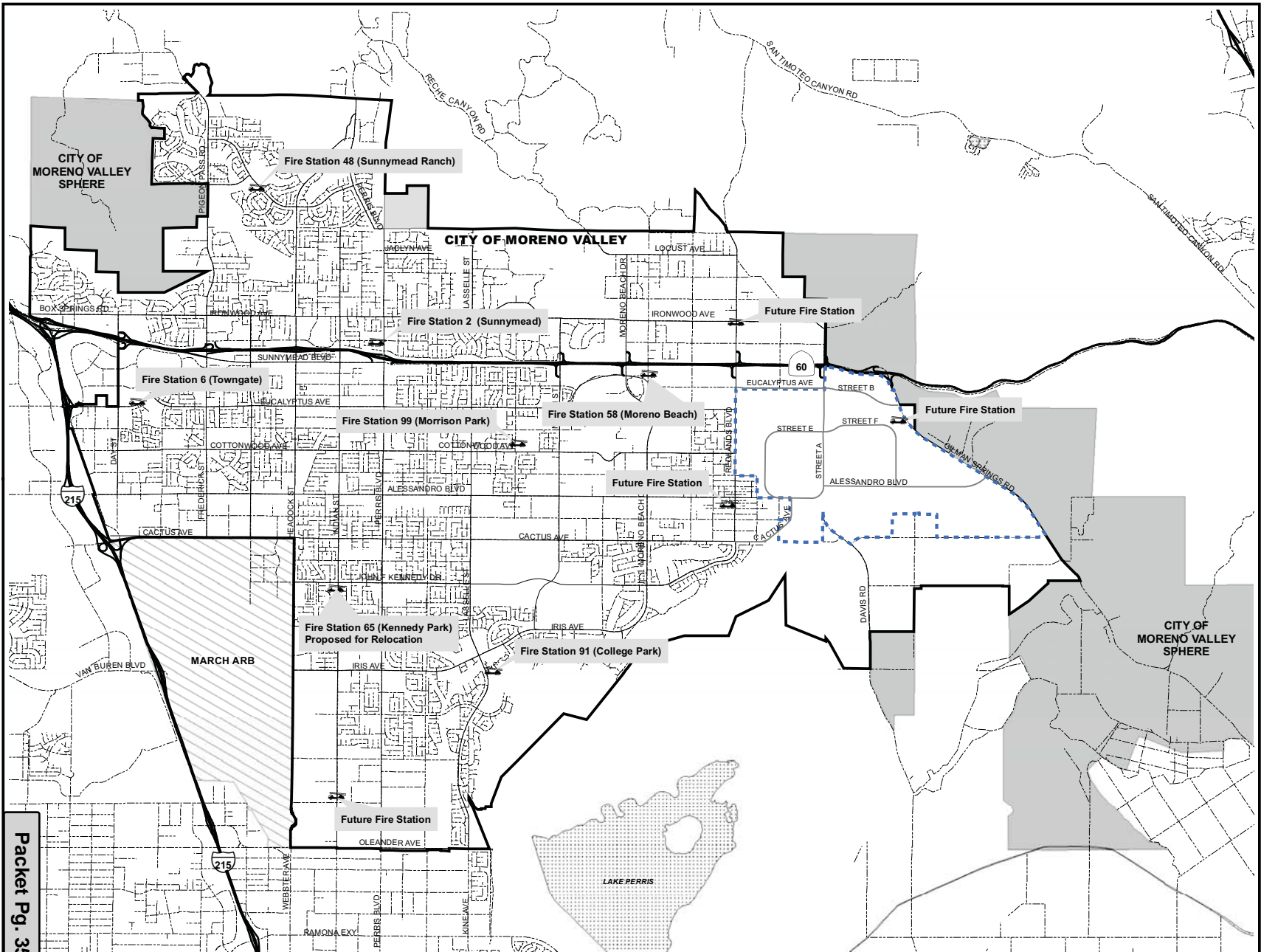
Date: May 18, 2015
 State Plane NAD83 Zone 6
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GEOGRAPHIC INFORMATION SYSTEMS

The information shown on this map was compiled from the Riverside County GIS and the City of Moreno Valley GIS. The land base and facility information on this map is for display purposes only and should not be relied upon without independent verification as to its accuracy. Riverside County and City of Moreno Valley will not be held responsible for any claims, losses or damages resulting from the use of this map.

* Note: Nason St from SR-60 to Fir Ave has 120 foot right of way.

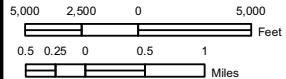




**FIGURE 6-1
FIRE STATIONS**

- Fire Stations
- Highways
- Major Streets
- Streets
- Waterbodies
- March ARB
- Moreno Valley
- Moreno Valley Sphere

** Future Fire Station locations are conceptual and subject to change*



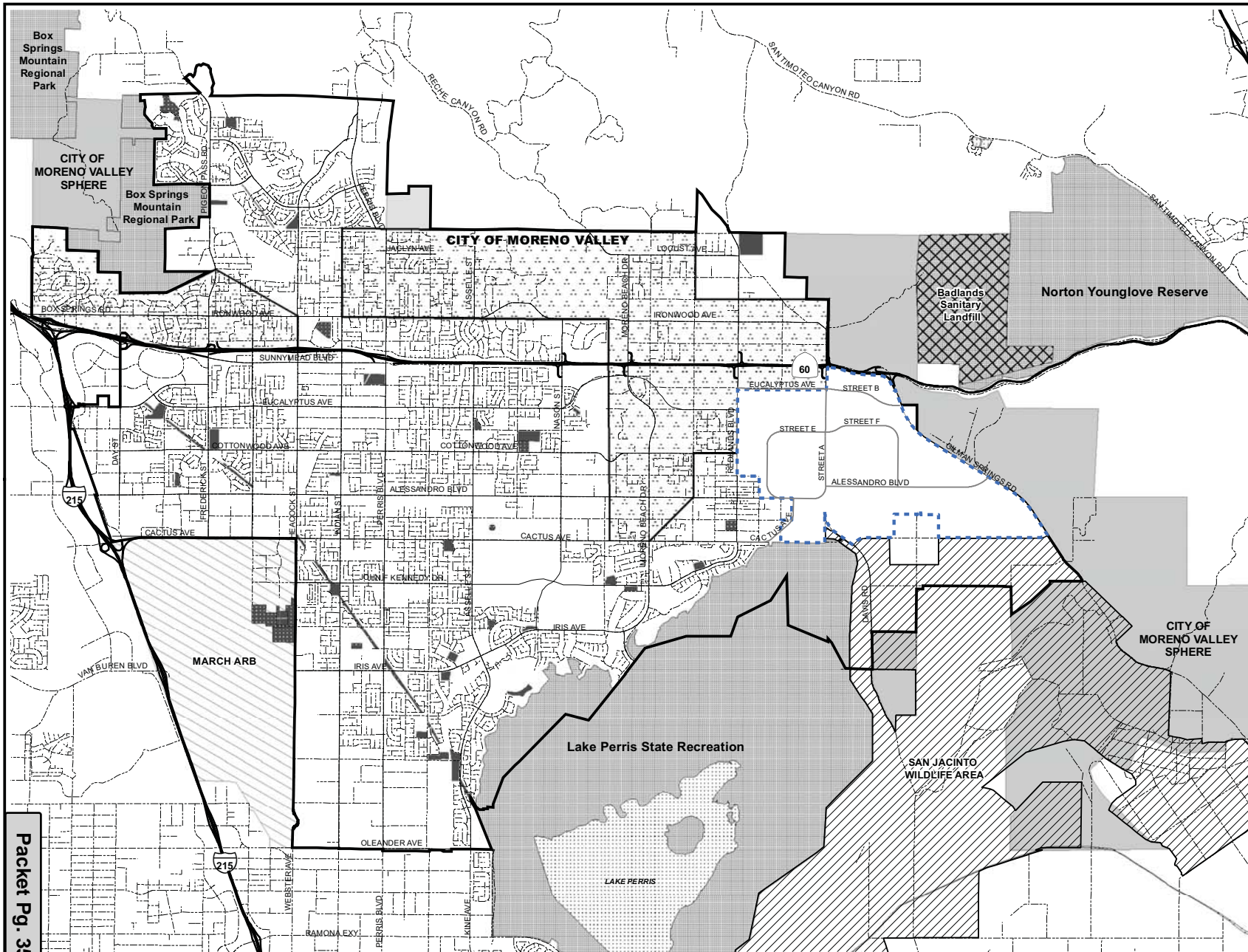
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 State Plane NAD83 Zone 6
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GEOGRAPHIC INFORMATION SYSTEMS

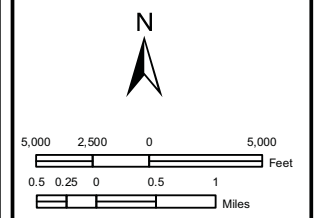
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**FIGURE 4-2
FUTURE PARKLANDS
ACQUISITION AREAS**



- Highways
- Major Streets
- Streets
- San Jacinto Wildlife Area
- Waterbodies
- Future Parkland Acquisition Areas
- Existing Active Parks
- Proposed Active Parks
- March ARB
- Badlands Sanitary Landfill
- State and County Parks
- Moreno Valley
- Moreno Valley Sphere



Date: October 13, 2014
 State Plane NAD83 Zone 6
 File: G:\ArcMap\Planning\GPA1014\ Future_Parklands.mxd

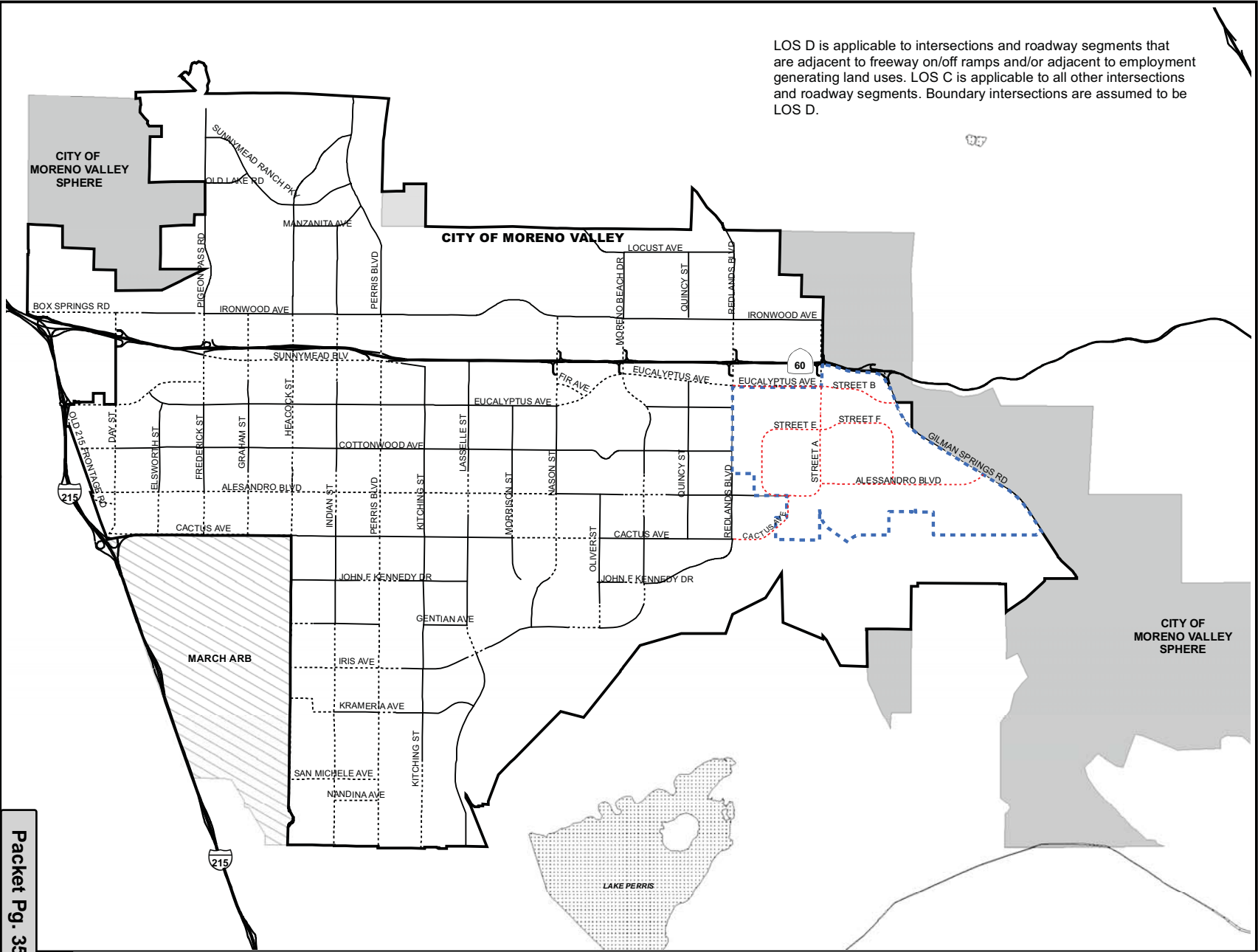
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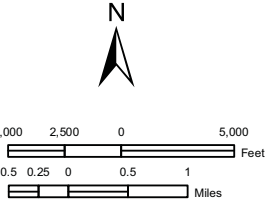


LOS D is applicable to intersections and roadway segments that are adjacent to freeway on/off ramps and/or adjacent to employment generating land uses. LOS C is applicable to all other intersections and roadway segments. Boundary intersections are assumed to be LOS D.

**FIGURE 9-2
LOS STANDARDS**



- LOS C
- - - - LOS D
- Highways
- ▭ Moreno Valley
- ▭ Moreno Valley Sphere
- ▨ March ARB
- ▤ Waterbodies



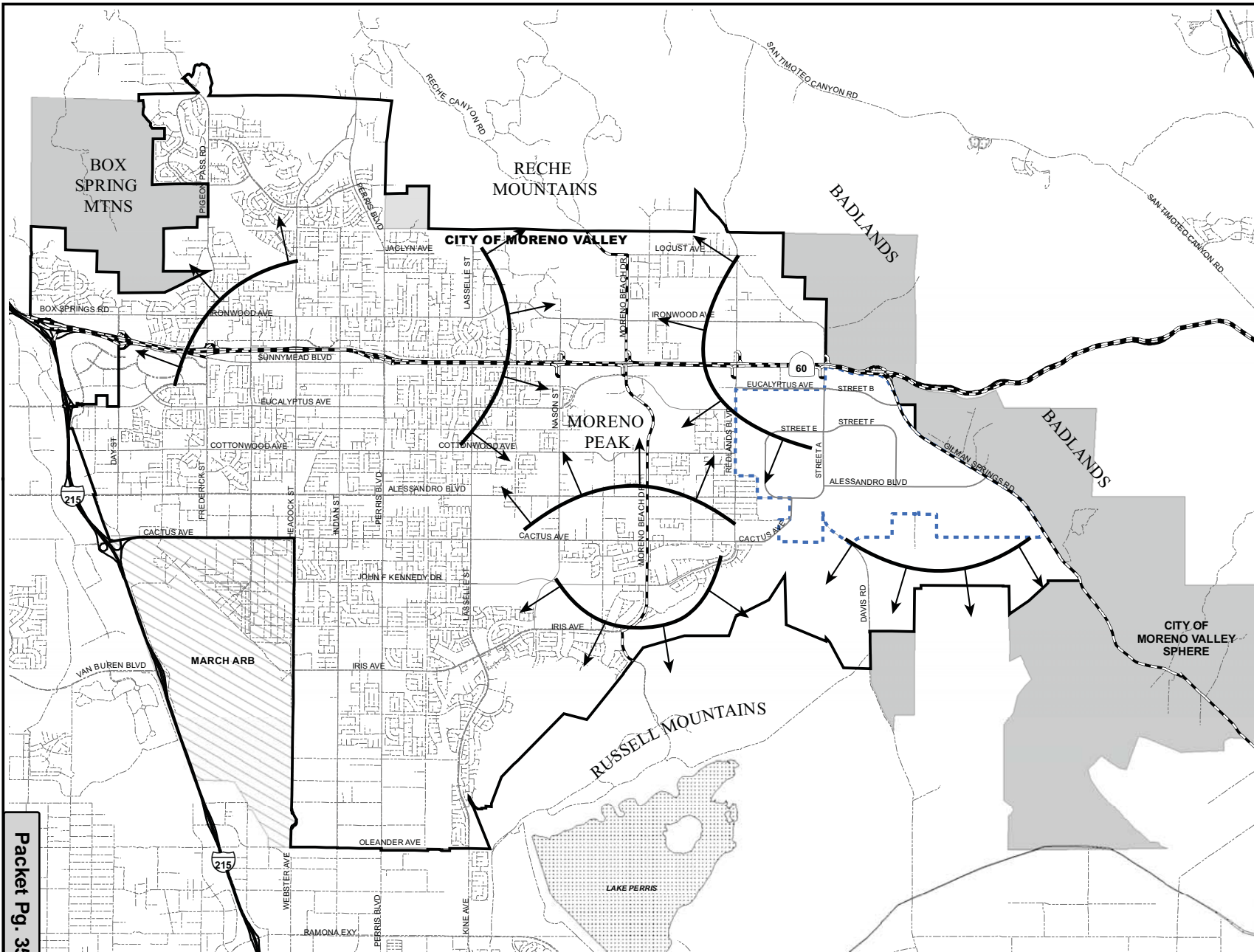
Date: May 18, 2015
 State Plane NAD83 Zone 6
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GEOGRAPHIC INFORMATION SYSTEMS

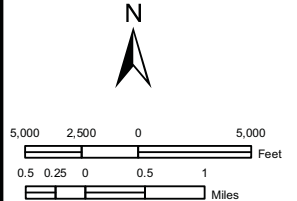
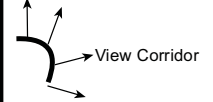
The information shown on this map was compiled from the Riverside County GIS and the City of Moreno Valley GIS. The land base and facility information on this map is for display purposes only and should not be relied upon without independent verification as to its accuracy. Riverside County and City of Moreno Valley will not be held responsible for any claims, losses or damages resulting from the use of this map.



**FIGURE 7-2
MAJOR SCENIC
RESOURCES**



- Scenic Route
- Highways
- Major Streets
- Streets
- Waterbodies
- March ARB
- Moreno Valley
- Moreno Valley Sphere



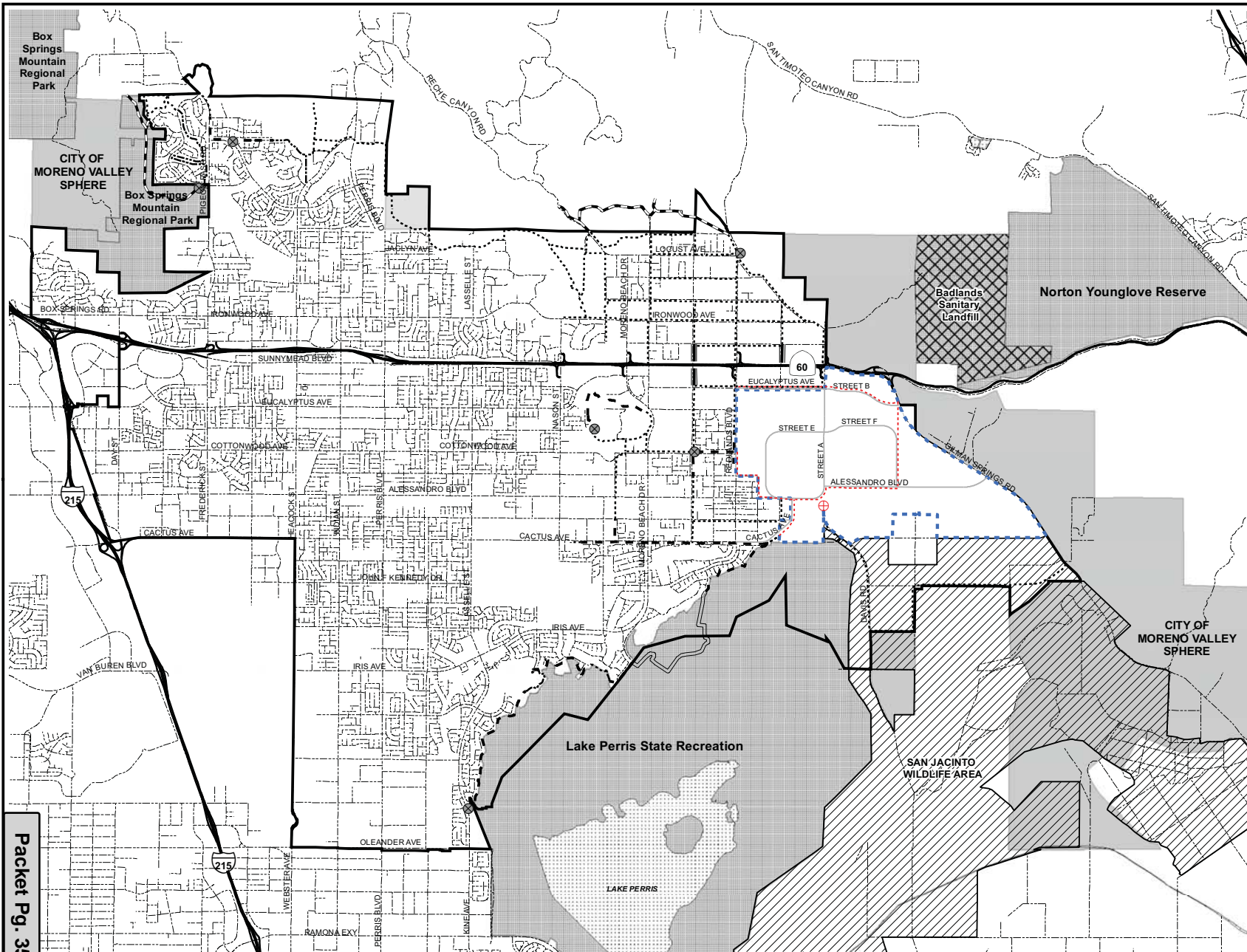
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 Major_Scenic.mxd

GEOGRAPHIC INFORMATION SYSTEMS

The information shown on this map was compiled from the Riverside County GIS and the City of Moreno Valley GIS. The land base and facility information on this map is for display purposes only and should not be relied upon without independent verification as to its accuracy. Riverside County and City of Moreno Valley will not be held responsible for any claims, losses or damages resulting from the use of this map.

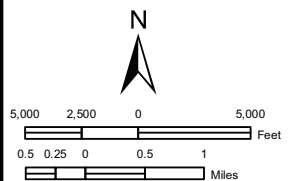


**FIGURE 4-3
MASTER PLAN
OF TRAILS**



- ⊗ Trail Staging - Existing
- ⊗ Trail Staging - Proposed
- Streets
- Highways
- - - Improved Trail
- · · Multiuse Trail
- · · Proposed Trail
- Regional Trail
- State Trail
- Proposed Subject to Feasibility of Freeway Bridge or Underpass
- ⊗ Badlands Landfill
- ▨ State and County Parks
- ▭ Moreno Valley
- ▭ Moreno Valley Sphere
- ▨ San Jacinto Wildlife Area
- ▨ Waterbodies

* Trail locations are approximate



Date: October 13, 2014
 State Plane NAD83 Zone 6
 File: G:\ArcMap\Planning\GPA1014\ MasterTrails.mxd









GEOGRAPHIC INFORMATION SYSTEMS

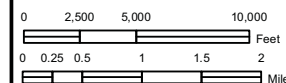
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**EXHIBIT A
FIGURE 9-4
BIKEWAY PLAN**

Bikeway Classification

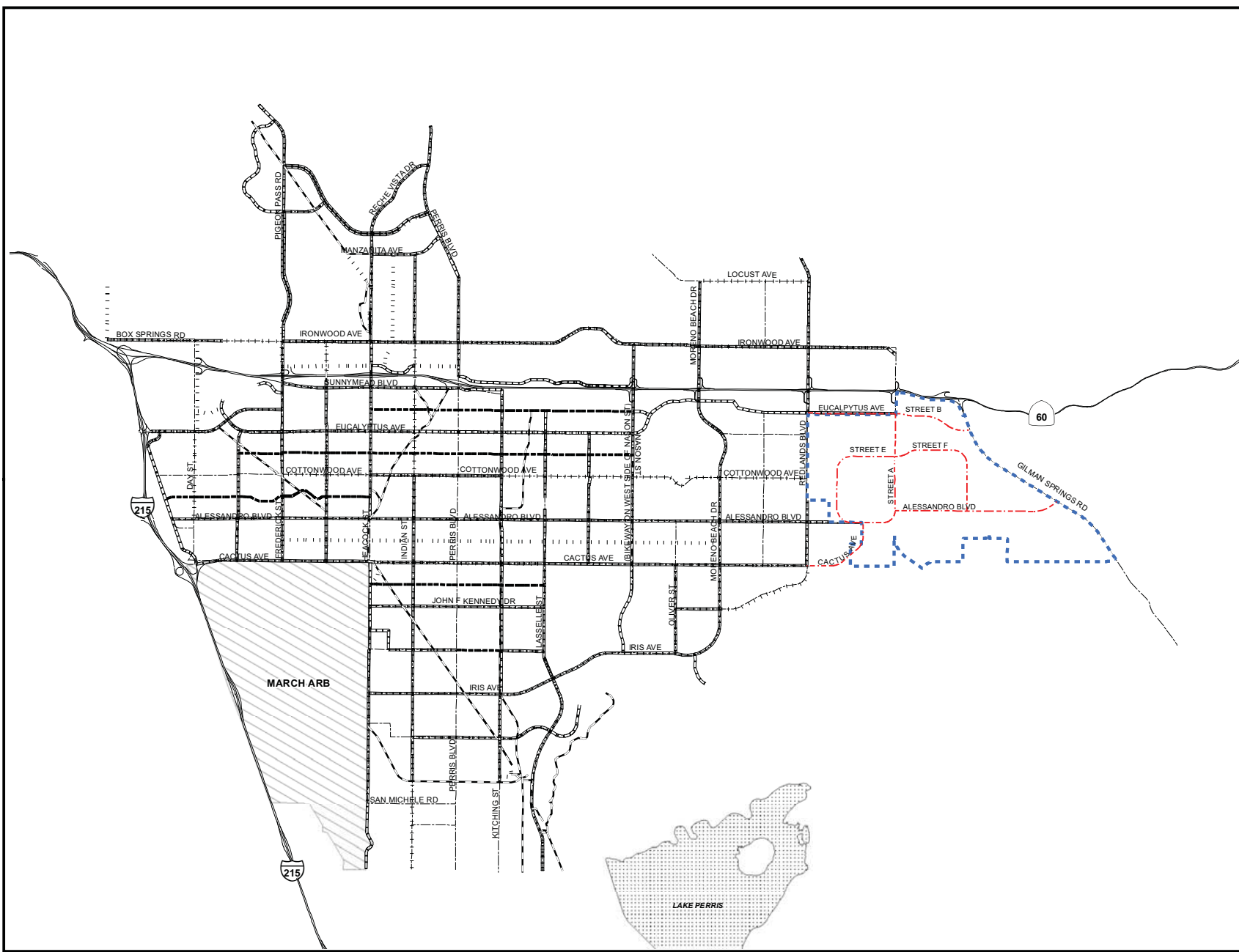
-  Class I
-  Class II
-  Class III
-  Bicycle Boulevard
-  Highways
-  Roads
-  Waterbodies
-  March ARB

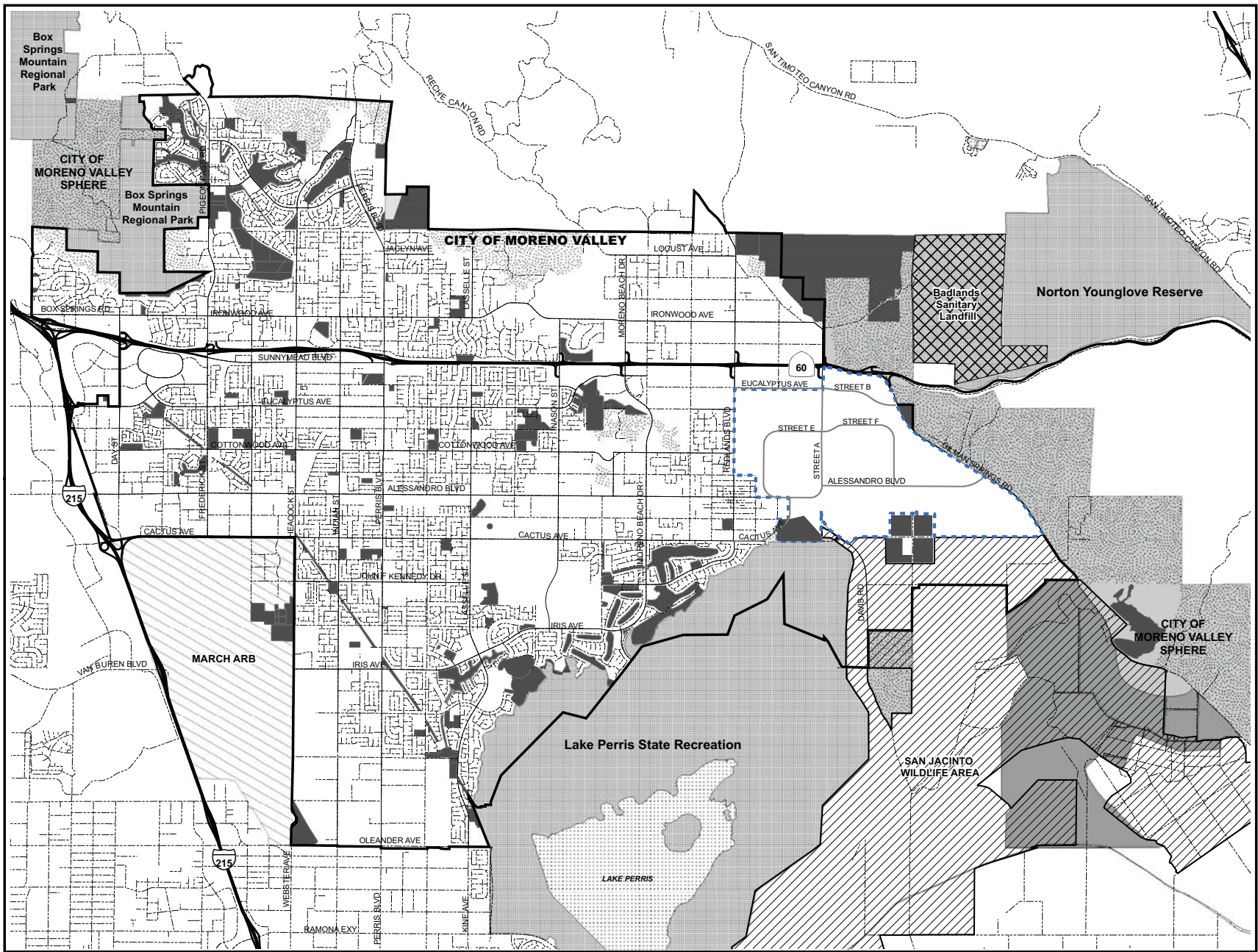


Date: May 14, 2015
 State Plane NAD83 Zone 6
 File: G:\ArcMap\Planning\GeneralPlanAmendment1014\BikewayWLC_May2015.mxd

GEOGRAPHIC INFORMATION SYSTEMS

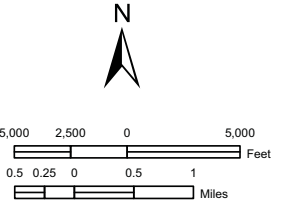
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**FIGURE 4-1
OPEN SPACE**

- Streets
- Major Streets
- Highways
- Natural Open Space, Parks, Golf Courses, Flood Basins, and other Open Areas
- ▨ Hillside Residential and Rural Residential
- Flood Plain
- ▨ State and County Parks
- ▨ San Jacinto Wildlife Area
- ▨ Badlands Landfill
- ▨ Moreno Valley
- ▨ Moreno Valley Sphere
- ▨ March ARB
- ▨ Waterbodies

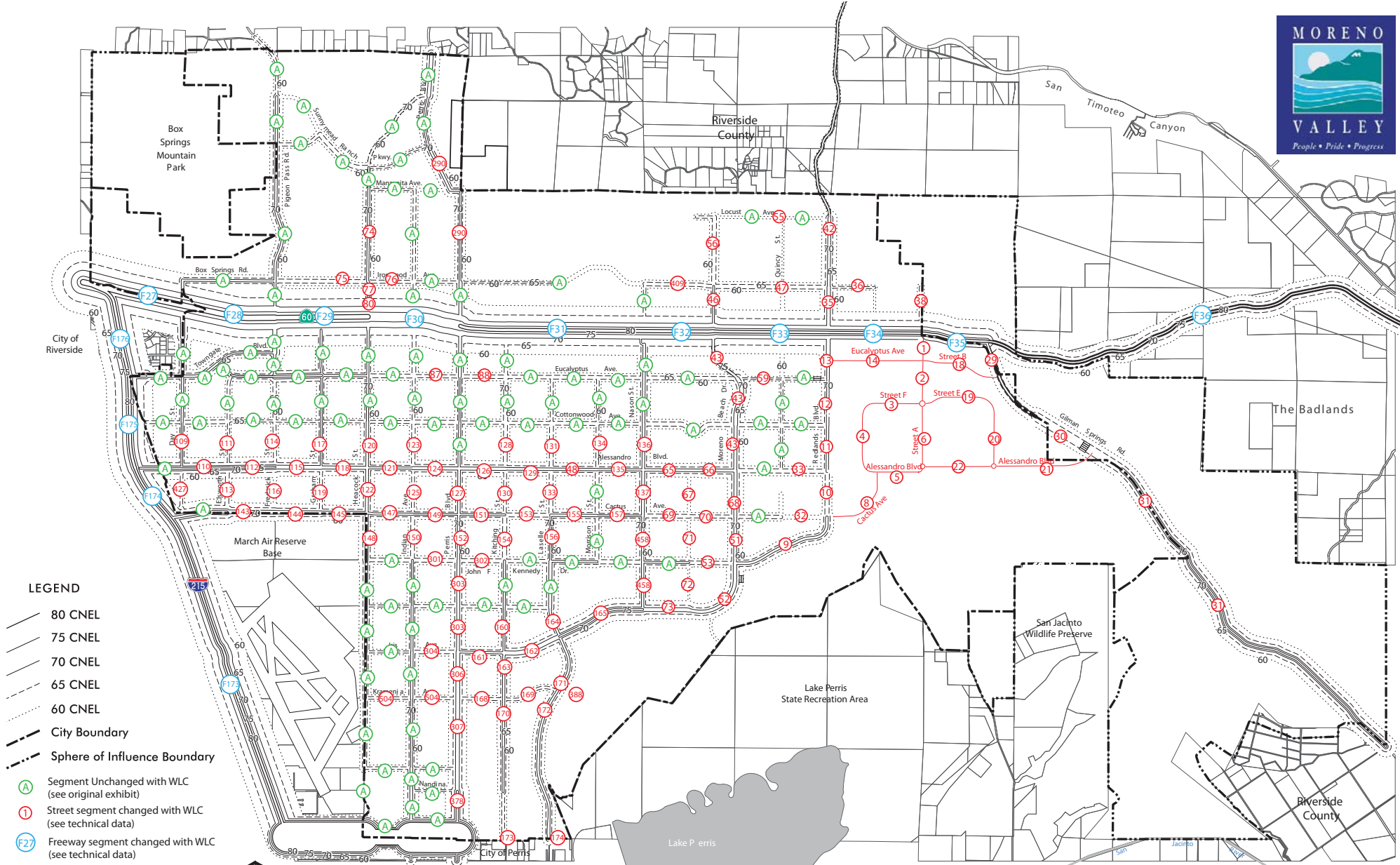
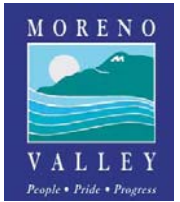


Date: May 28, 2015
 State Plane NAD83 Zone 6
 File: G:\ArcMap\Planning\GPA1014\OpenSpace.mxd

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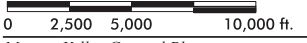
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- LEGEND**
- 80 CNEL
 - 75 CNEL
 - 70 CNEL
 - 65 CNEL
 - 60 CNEL
 - City Boundary
 - Sphere of Influence Boundary
 - Segment Unchanged with WLC (see original exhibit)
 - Street segment changed with WLC (see technical data)
 - Freeway segment changed with WLC (see technical data)

Sources: County of Riverside GIS, City of Moreno Valley, USGS



Buildout Noise Contours Figure 6-2

Technical Data to Accompany Buildout Noise Contour Map
(Street Segments)

ID	Arterial	From	To	Distance from Centerline (ft)		
				70 CNEL	65 CNEL	60 CNEL
1	Street A	State Route 60	Eucalyptus Ave	144	311	670
2	Street A	Eucalyptus Ave	Street F	153	330	712
3	Street E	west of Street A		0	77	167
4	Street E	north of Alessandro Blvd		0	25	55
5	Street E	Street D	Street A	41	88	191
6	Street A	Street F	Street C	77	167	361
8	Street D	Street E	Cactus Ave	54	117	253
9	John F Kennedy Dr	south of Cactus Ave		0	44	95
10	Redlands Blvd	Alessandro Blvd	Cactus Ave	13	28	61
11	Redlands Blvd	Dracaea Ave	Alessandro Blvd	15	33	72
12	Redlands Blvd	Eucalyptus Ave	Dracaea Ave	24	52	113
13	Redlands Blvd	State Route 60	Eucalyptus Ave	57	123	265
14	Eucalyptus Ave	east of Redlands Blvd		0	48	104
18	Street B	east of Street A		0	29	62
19	Street F	east of Street A		0	43	93
20	Street F	north of Street C		0	24	52
21	Street C	east of Street A		0	55	119
22	Street C	west of Street F		0	56	120
29	Gilman Springs Rd	State Route 60	Eucalyptus Ave	111	240	518
30	Gilman Springs Rd	Eucalyptus Ave	Street C	100	217	468
31	Gilman Springs Rd	south of Street C		0	93	200
32	Cactus Ave	west of Redlands Blvd		0	27	60
33	Alessandro Blvd	west of Redlands Blvd		0	19	42
35	Redlands Blvd	Ironwood Ave	State Route 60	70	151	325
36	Ironwood Ave	Redlands Blvd	Highland Blvd	18	39	84
38	Theodore St	State Route 60	Highland Blvd	31	67	145
42	Redlands Blvd	Ironwood Ave	San Timoteo Canyon Rd	80	172	372
43	Moreno Beach Dr	Alessandro Blvd	SR 60	44	96	208
46	Moreno Beach Dr	State Route 60	Ironwood Ave	52	112	242
47	Ironwood Ave	Moreno Beach Dr	Redlands Blvd	8	19	41
48	Alessandro Blvd	Lasselle St	Morrison St	19	41	89
51	Moreno Beach Dr	John F Kennedy Dr	Cactus Ave	14	30	65
52	Moreno Beach Dr	John F Kennedy Dr	Oliver St	14	31	68
53	John F Kennedy Dr	Oliver St	Moreno Beach Dr	3	8	18
55	Locust Ave	Moreno Beach Dr	Redlands Blvd	16	36	78
56	Moreno Beach Dr	Locust Ave	Ironwood Ave	23	50	108
59	Eucalyptus Ave	Moreno Beach Dr	Quincy Dr	34	75	162
65	Alessandro Blvd	Nason St	Oliver St	33	72	156
66	Alessandro Blvd	Oliver St	Moreno Beach Dr	31	67	145
67	Oliver St	Alessandro Blvd	Cactus Ave	4	9	20
68	Moreno Beach Dr	Alessandro Blvd	Cactus Ave	44	95	206
69	Cactus Ave	Nason St	Oliver St	32	69	150
70	Cactus Ave	Oliver St	Moreno Beach Dr	14	31	67
71	Oliver St	Cactus Ave	John F Kennedy Dr	17	38	81
72	Oliver St	John F Kennedy Dr	Iris Ave	15	33	72
73	Iris Ave	Nason St	Oliver St	59	128	277
74	Heacock St	Manzanita Ave	Ironwood Ave	43	93	201
75	Ironwood Ave	Graham St	Heacock St	35	76	165
76	Ironwood Ave	Heacock St	Indian Ave	33	71	154
77	Heacock St	Ironwood Ave	Hemlock Ave	45	97	209
80	Heacock St	Hemlock Ave	SR 60 WB Ramps	51	110	238
87	Eucalyptus Ave	Indian St	Perris Blvd	21	46	100
88	Eucalyptus Ave	Perris Blvd	Kitching St	20	44	94
109	Day St	Cottonwood Ave	Alessandro Blvd	23	51	110
110	Alessandro Blvd	Day St	Elsworth St	65	141	304
111	Elsworth St	Cottonwood Ave	Alessandro Blvd	16	36	77
112	Alessandro Blvd	Elsworth St	Frederick St	64	137	297
113	Elsworth St	Alessandro Blvd	Cactus Ave	35	75	163
114	Frederick St	Cottonwood Ave	Alessandro Blvd	41	89	192
115	Alessandro Blvd	Frederick St	Graham St	62	134	290
116	Frederick St	Alessandro Blvd	Cactus Ave	26	56	120
117	Graham St	Cottonwood Ave	Alessandro Blvd	29	63	137
118	Alessandro Blvd	Graham St	Heacock St	66	142	306
119	Graham St	Alessandro Blvd	Cactus Ave	40	86	186
120	Heacock St	Cottonwood Ave	Alessandro Blvd	40	87	188
121	Alessandro Blvd	Heacock St	Indian St	62	134	288
122	Heacock St	Alessandro Blvd	Cactus Ave	11	25	55
123	Indian St	Cottonwood Ave	Alessandro Blvd	35	76	165
124	Alessandro Blvd	Indian St	Perris Blvd	63	135	292
125	Indian St	Alessandro Blvd	Cactus Ave	13	29	63
126	Alessandro Blvd	Perris Blvd	Kitching St	58	125	269
127	Perris Blvd	Alessandro Blvd	Cactus Ave	24	51	111
128	Kitching St	Cottonwood Ave	Alessandro Blvd	30	65	140
129	Alessandro Blvd	Kitching St	Lasselle St	55	120	258
130	Kitching St	Alessandro Blvd	Cactus Ave	10	21	46
131	Lasselle St	Cottonwood Ave	Alessandro Blvd	22	47	102
133	Lasselle St	Alessandro Blvd	Cactus Ave	29	62	135

Attachment: Exhibits A - M Proposed Resolution_GPA (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A CHANGE OF ZONE, WORLD LOGISTICS)

134	Morrison St	Cottonwood Ave	Alessandro Blvd	21	45	98
135	Alessandro Blvd	Morrison St	Nason St	19	42	92
136	Nason St	Cottonwood Ave	Alessandro Blvd	49	105	228
137	Nason St	Alessandro Blvd	Cactus Ave	55	119	257
143	Cactus Ave	Elsworth St	Frederick St	59	128	276
144	Cactus Ave	Frederick St	Graham St	66	143	309
145	Cactus Ave	Graham St	Heacock St	57	123	266
147	Cactus Ave	Heacock St	Indian St	44	96	207
148	Heacock St	Cactus Ave	John F Kennedy Dr	16	34	75
149	Cactus Ave	Indian St	Perris Blvd	39	86	185
150	Indian St	Cactus Ave	John F Kennedy Dr	12	26	58
151	Cactus Ave	Perris Blvd	Kitching St	41	88	190
152	Perris Blvd	Cactus Ave	John F Kennedy Dr	23	50	109
153	Cactus Ave	Kitching St	Lasselle St	35	76	165
154	Kitching St	Cactus Ave	John F Kennedy Dr	6	14	30
155	Cactus Ave	Lasselle St	Morrison St	36	78	168
156	Lasselle St	Cactus Ave	John F Kennedy Dr	43	92	199
157	Cactus Ave	Morrison St	Nason St	43	92	200
160	Kitching St	Gentian Ave	Iris Ave	22	47	103
161	Iris Ave	Perris Blvd	Kitching St	19	42	91
162	Iris Ave	Kitching St	Lasselle St	28	61	131
163	Kitching St	Iris Ave	Ivory Ave	20	45	97
164	Lasselle St	Gentian Ave	Iris Ave	41	88	190
165	Iris Ave	Lasselle St	Nason St	31	67	145
168	Krameria Ave	Perris Blvd	Lasselle St	9	20	43
169	Krameria Ave	Kitching St	Lasselle St	15	32	69
170	Kitching St	Krameria Ave	Lurin Ave	26	57	124
171	Lasselle St	Cahuilla Dr	Krameria Ave	21	45	98
172	Lasselle St	Krameria Ave	Arroyo Park Dr	16	34	75
173	Oleander Ave	Perris Blvd	Lasselle St	16	35	76
174	Oleander Ave	Lasselle St	Lake Perris Dr	8	17	38
290	Perris Blvd	Sunnymead Blvd	Fir Ave	59	127	275
301	John F. Kennedy Dr	Indian St	Perris Blvd	25	54	116
302	John F. Kennedy Dr	Perris Blvd	Kitching St	26	56	122
303	Perris Blvd	John F. Kennedy Dr	Iris Ave	60	129	278
304	Iris Ave	Indian St	Perris Blvd	39	84	181
306	Perris Blvd	Iris Ave	Krameria Ave	31	67	145
307	Perris Blvd	Krameria Ave	Harley Know Blvd	27	60	129
387	Perris Blvd	Krameria Ave	Harley Know Blvd	29	63	139
388	Krameria Ave	Lasselle St	Spirit Rd	8	18	40
409	Ironwood Ave	Nason St	Moreno Beach Dr	22	47	102
427	Day St	south of Alessandro Blvd		0	23	50
458	Nason St	South of Cactus Ave		0	37	81
488	Nason St	North of Iris Ave		0	37	81
504	Krameria Ave	west of Perris Blvd		0	39	84

Attachment: Exhibits A - M Proposed Resolution_GPA (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A CHANGE OF ZONE, WORLD LOGISTICS)

Technical Data to Accompany Buildout Noise Contour Map
(Freeway Segments)

ID	Freeway	From	Distance from Centerline (ft)		
			70 CNEL	65 CNEL	60 CNEL
F27	SR---60	I---215 to Day St	422	911	1963
F28	SR---60	Day St to Pigeon Pass Rd/Frederick St	430	927	1998
F29	SR---60	Pigeon Pass Rd/Frederick St to Heacock St	395	851	1835
F30	SR---60	Heacock St to Perris Blvd	373	805	1734
F31	SR---60	Perris Blvd to Nason St	348	750	1617
F32	SR---60	Nason St to Moreno Beach Dr	337	726	1565
F33	SR---60	Moreno Beach Dr to Redlands Blvd	293	633	1363
F34	SR---60	Redlands Blvd to Theodore St	289	624	1344
F35	SR---60	Theodore St to Gilman Springs Rd	303	654	1409
F36	SR---60	Gilman Springs Rd to Jack Rabbit Trail	270	581	1253
F173	SR---215	Van Buren Blvd to Cactus Ave	470	1013	2182
F174	SR---215	Cactus Ave to Alessandro Blvd	482	1040	2241
F175	SR---215	Alessandro Blvd to Eucalyptus Ave	463	999	2152
F176	SR---215	Eucalyptus Ave to SR---60	464	1000	2156

Attachment: Exhibits A - M Proposed Resolution_GPA (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A CHANGE OF ZONE, WORLD LOGISTICS)

Unchanged Segments

Street	Start	End
NORTH AND SOUTH		
Day St	Cottonwood Ave	Eucalyptus Ave
Day St	Eucalyptus Ave	SR-60
Elsworth St	Cottonwood Ave	Eucalyptus Ave
Frederick St	Cottonwood Ave	Eucalyptus Ave
Frederick St	Eucalyptus Ave	Towngate Blvd
Frederick St	Towngate Blvd	SR-60
Graham St	Cottonwood Ave	Eucalyptus Ave
Graham St	Eucalyptus Ave	SR-60
Heacock St	Cottonwood Ave	Eucalyptus Ave
Heacock St	Eucalyptus Ave	SR-60
Indian St	Cottonwood Ave	Eucalyptus Ave
Indian St	Eucalyptus Ave	SR-60
Perris Blvd	Alessandro Blvd	Cottonwood Ave
Perris Blvd	Cottonwood Ave	Eucalyptus Ave
Perris Blvd	Eucalyptus Ave	SR-60
Kitching St	Cottonwood Ave	Eucalyptus Ave
Kitching St	Eucalyptus Ave	SR-60
Laselle St	Cottonwood Ave	Eucalyptus Ave
Morrison St	Cottonwood Ave	Eucalyptus Ave
Nason St	Cottonwood Ave	Eucalyptus Ave
Nason St	Eucalyptus Ave	SR-60
Quincy St	Cottonwood Ave	Eucalyptus Ave
Quincy St	Alessandro Blvd	Cottonwood Ave
Heacock St	E. Oleander Ave	San Michele Rd
Heacock St	San Michele Rd	Krameria Ave
Heacock St	Krameria Ave	Iris Ave
Heacock St	Iris Ave	Gentian Ave
Heacock St	Gentian Ave	John F. Kennedy Dr
Indian St	E. Oleander Ave	Nandina Ave
Indian St	Nandina Ave	San Michele Rd
Indian St	San Michele Rd	Krameria Ave
Indian St	Krameria Ave	Iris Ave
Indian St	Iris Ave	Gentian Ave
Indian St	Gentian Ave	John F. Kennedy Dr
Kitching St	Gentian Ave	John F. Kennedy Dr
Laselle St	Gentian Ave	John F. Kennedy Dr
Morrison St	John F. Kennedy Dr	Cactus Ave
Morrison St	Cactus Ave	Alessandro Blvd
Pigeon Pass Rd	SR-60	Box Springs Rd
Pigeon Pass Rd	Box Springs Rd	Old Lake Dr
Pigeon Pass Rd	Old Lake Dr	Sunnymead Ranch Pkwy

Pigeon Pass Rd	Sunnymean Ranch Pkwy	City Limits
Heacock St	Manzanita Ave	Sunnymead Ranch Pkwy
Heacock St	Sunnymean Ranch Pkwy	Perris Blvd
Indian St	SR-60	Ironwood Ave
Indian St	Ironwood Ave	Manzanita Ave
Perris Blvd	SR-60	Ironwood Ave
Perris Blvd	Sunnymean Ranch Pkwy	Heacock St
Perris Blvd	Heacock St	City Limits
Nason St	SR-60	Ironwood Ave
EAST WEST		
Old Lake Dr	Pigeon Pass Rd	Sunnymead Ranch Pkwy
Sunnymead Ranch Pkwy	Pigeon Pass Rd	Old Lake Dr
Sunnymead Ranch Pkwy	Old Lake Dr	Heacock St
Sunnymead Ranch Pkwy	Heacock St	Perris Blvd
Manzanita Ave	Heacock St	Indian Ave
Manzanita Ave	Indian Ave	Perris Blvd
Locust Ave	Moreno Beach Dr	Quincy St
Locust Ave	Quincy St	Redlands Blvd
Box Springs Rd	Day St	Pigeon Pass Rd
Ironwood Ave	Indian Ave	Perris Blvd
Ironwood Ave	Perris Blvd	Nason St
Towngate Blvd	215	Day St
Towngate Blvd	Day St	Eucalyptus Ave
Towngate Blvd	Eucalyptus Ave	Frederick St
Eucalyptus Ave	Towngate Blvd	Elsworth St
Eucalyptus Ave	Elsworth St	Frederick St
Eucalyptus Ave	Frederick St	Graham St
Eucalyptus Ave	Graham St	Heacock St
Eucalyptus Ave	Heacock St	Indian Ave
Eucalyptus Ave	Kitching St	Laselle St
Eucalyptus Ave	Laselle St	Morrison St
Eucalyptus Ave	Morrison St	Nason St
Eucalyptus Ave	Nason St	Moreno Beach Dr
Eucalyptus Ave	Quincy St	Redlands Blvd
Cottonwood Ave	215	Day St
Cottonwood Ave	Day St	Elsworth St
Cottonwood Ave	Elsworth St	Frederick St
Cottonwood Ave	Frederick St	Graham St
Cottonwood Ave	Graham St	Heacock St
Cottonwood Ave	Heacock St	Indian Ave
Cottonwood Ave	Indian Ave	Perris Blvd
Cottonwood Ave	Perris Blvd	Kitching St
Cottonwood Ave	Kitching St	Laselle St
Cottonwood Ave	Laselle St	Morrison St
Cottonwood Ave	Morrison St	Nason St
Cottonwood Ave	Nason St	Moreno Beach Dr

Cottonwood Ave	Moreno Beach Dr	Quincy St
Cottonwood Ave	Quincy St	Redlands Blvd
Alessandro Blvd	215	Day St
Alessandro Blvd	Moreno Beach Dr	Quincy St
Cactus Ave	215	Elsworth St
Cactus Ave	Moreno Beach Dr	Quincy St
John F. Kennedy Dr	Heacock St	Indian Ave
John F. Kennedy Dr	Kitching St	Laselle St
John F. Kennedy Dr	Laselle St	Morrison St
John F. Kennedy Dr	Morrison St	Nason St
John F. Kennedy Dr	Nason St	Oliver St
Gentian Ave	Heacock St	Indian Ave
Gentian Ave	Indian Ave	Perris Blvd
Gentian Ave	Perris Blvd	Kitching St
Gentian Ave	Kitching St	Laselle St
Iris Ave	Heacock St	Indian Ave
San Michele Rd	Heacock St	Indian Ave
San Michele Rd	Indian Ave	Perris Blvd
Nandina Ave	Indian Ave	Perris Blvd
E. Oleander Ave	Heacock St	Indian Ave
E. Oleander Ave	Indian Ave	Perris Blvd

ORDINANCE NO. 900

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF MORENO VALLEY, CALIFORNIA, APPROVING PA12-0012 (CHANGE OF ZONE), PA12-0013 (SPECIFIC PLAN) and PA12-0014 (PRE-ZONING/ANNEXATION), WHICH WOULD INCLUDE THE PROPOSED WORLD LOGISTICS CENTER SPECIFIC PLAN, A FULL REPEAL OF THE MORENO HIGHLANDS SPECIFIC PLAN NO. 212-1, PRE-ZONING/ANNEXATION FOR 85 ACRES AT NORTHWEST CORNER OF GILMAN SPRINGS ROAD AND ALESSANDRO BOULEVARD, CHANGE OF ZONE TO LOGISTICS DEVELOPMENT (LD), LIGHT LOGISTICS (LL) AND OPEN SPACE (OS) FOR AREAS WITHIN THE PROPOSED WORLD LOGISTICS CENTER SPECIFIC PLAN BOUNDARY, AND A CHANGE OF ZONE TO OPEN SPACE (OS) FOR THOSE PROJECT AREAS OUTSIDE AND SOUTHERLY OF THE PROPOSED WORLD LOGISTICS CENTER SPECIFIC PLAN BOUNDARY

The City Council of the City of Moreno Valley does ordain as follows:

SECTION 1: RECITALS

1.1 Pursuant to the provisions of law, public hearings were held before the City of Moreno Valley Planning Commission on June 11, 25, and 30, 2015, and the City Council on July 15, 2015.

1.2 The matter was fully discussed and the public and other agencies presented testimony and documentation.

1.3 The revised Zoning Atlas map is attached hereto and incorporated herein as Exhibit A.

1.4 The pre-zoning map for the 85 acres subject to future annexation is attached hereto and incorporated herein as Exhibit B.

1.5 The Specific Plan is attached hereto and incorporated herein as Exhibit C.

SECTION 2: FINDINGS

2.1 Based upon substantial evidence presented to this City Council during the above-referenced meeting on July 15, 2015, including written and oral staff reports, and the record from the public hearing, this City Council hereby specifically finds as follows:

1. **Conformance with General Plan Policies** – The proposed amendment to zoning, establishment of the World Logistics Center (WLC) Specific Plan, and related items are consistent with the General Plan, and its goals, objectives, policies and programs and with any applicable specific plan.

FACT: The proposed amendment to existing zoning classifications are consistent with the proposed General Plan amendments proposed with the WLC Project including land use change to Business Park/Light industrial, all proposed zoning included in the WLC Specific Plan and areas lying outside and south of the WLC Specific Plan boundaries. Within the proposed WLC Specific Plan area (2,610 acres) 2,420 acres are proposed for logistics or industrial warehouse land uses, 74.3 acres for Open Space and 115.8 acres designated for roadway rights of way. Within the WLC Specific Plan area, up to 40.4 million square feet of future high-cube logistics uses are proposed in the Logistics Development land use designation, 200,000 square feet of warehouse and related uses are proposed in the Light Logistics land use designation. The proposed project by repeal of the Moreno Highlands Specific Plan will result in a reduction of residential zoning; however, the reduction of residential zoning is consistent with the 2014 updated General Plan Housing Element.

The proposed Pre-zoning/Annexation of an 85 acre portion of land currently in the County of Riverside into the City's boundaries by a subsequent separate action is consistent with the goals, objectives, policies and programs of the General Plan. The changes are consistent with Objective No. 42 of the City of Moreno General Plan which requires the City to maintain boundaries that are "logical in terms of service capabilities, economic development need, social and economic interdependencies, citizen desires and city costs and revenues." Policy 42.1 of the General Plan states that "the City will support and encourage the annexation of unincorporated areas within the General Plan study area for which benefits will be derived by the City upon annexation." The affected property is a logical extension of the city limits and Moreno Valley is the logical service provider. The area is currently included in the City's Sphere of Influence and additional annexation of approximately 85 acres would be within the City's service capacities.

2. **Health, Safety and Welfare** – The proposed amendment to zoning and related items will not be detrimental to the public health, safety or welfare or materially injurious to properties or improvements in the vicinity.

FACT: An Environmental Impact report (EIR) has been prepared for the overall project, including the proposed Change of Zone, General Plan amendment and WLC Specific Plan. The analysis presented in the EIR indicates that the proposed project will have certain significant unavoidable adverse impacts to Aesthetics, Air Quality Land Use, Noise, and Traffic/Circulation as described in detail within the document. All other environmental effects

evaluated in the EIR are considered to be less than significant, or can be feasibly reduced with mitigation measures to less than significant levels. A Mitigation Monitoring Program, which will ensure the completion of required mitigation measures for the project is included in the EIR.

A Statement of Overriding Considerations has been prepared in consideration of project impacts related to Aesthetics, Air Quality, Land Use, Noise, and Transportation/Traffic that cannot be mitigated to a less than significant level.

Of particular note, mitigation measures for air quality include measures such as the required inclusion of Tier 4 construction equipment, restriction of trucks that fall below 2010 engine emissions standards from entering project areas and limitation of truck idling to three (3) minutes, all in an effort to reduce air pollutant emissions. Mitigation measures for Noise include the reduction of short-term construction noise levels to include the requirement of a Noise Reduction Compliance Plan, restrictions on grading during nighttime hours, potential sound barriers, as well as measures for long term traffic and operation noise to include building specific noise studies required for individual plot plans, the potential for sound walls and maintenance of buffer areas.

3. The proposed amendment to zoning and related items are consistent with the purposes and intent of Title 9 of the City Municipal Code.

FACT: The proposed project conforms to applicable zoning regulations of the City and is consistent with modifications proposed to land use and zoning within the proposed General Plan Amendments, WLC Specific Plan, and other changes to zoning outside of the WLC Specific Plan area.

The WLC Specific Plan includes development regulations and design standards such as a circulation system that limits truck traffic access in the Plan area primarily through Theodore Street from Highway 60, and Gilman Springs Road from Alessandro Boulevard and a future street designated in the Plan as Street B, and thereby away from existing residential neighborhoods west of the project area. The Specific Plan provides special edge treatment areas surrounding the perimeter of the proposed WLC Specific Plan boundary which are consistent with aesthetic and quality community design objectives of the City.

The change of zone outside the WLC Specific Plan area includes a change to Open Space (OS) for areas to the south of the WLC

Specific Plan boundary extending to the San Jacinto Wildlife Area. The change of zone is consistent with the California Department of Fish and Wildlife land that is provided for habitat use and San Diego Gas and Electric properties which include utility uses and open space buffer areas around their property.

SECTION 3 - PREZONING

3.1 The City of Moreno Valley Official Zoning Atlas, as adopted by Ordinance No. 359, on April 14, 1992, and as amended thereafter from time to time by the City Council of the City of Moreno Valley, is further amended by placing in effect the intended zone or zone classification for the 85 acres of property at the northwest corner of Gilman Springs Road and Alessandra, as shown on the attached WLC Pre-Zoning map marked "Exhibit B" and included herein by reference, and which is contingent upon subsequent annexation action.

SECTION 4 AMENDMENT OF THE OFFICIAL ZONING ATLAS

4.1 **World Logistics Center Specific Plan** – Based on the findings contained in this ordinance, the City Council hereby amends the Official Zoning Atlas, in addition to as amended in Section 3, by including the property stated within this ordinance, and establishing a zoning classification of WLCSP-LD (World Logistics Center Specific Plan – Logistics Development) and WLCSP-LL (World Logistics Center Specific Plan – Light Logistics) for certain property as described on Exhibit A and C (included herein by reference, and on file in the office of the City Clerk).

4.2 **Areas located outside of the World Logistics Center Specific Plan** - Based on the findings contained in this ordinance, the City Council hereby amends the Official Zoning Atlas by including the property stated within this ordinance, and providing zoning classifications of OS (Open Space) for certain property as described on Exhibit A (included herein by reference, and on file in the office of the City Clerk).

4.3 **Pre-Zoning of 85 acre Annexation Site** - Based on the findings contained in this ordinance, the City Council hereby amends the Official Zoning Atlas by including the property stated within this ordinance into the City of Moreno Valley and the existing Sphere of Influence contingent upon a subsequent approval from the Riverside County Local Area Formation Commission (LAFCO), and establishing a zoning classification of WLCSP-LD (World Logistics Center Specific Plan – Logistics Development) for certain property as described in Exhibit B (included herein by reference, and on file in the office of the City Clerk).

SECTION 5: ADOPTION

5.1 Based on the foregoing recitals and findings, the City Council of the City of Moreno Valley does hereby adopt and approve the Zoning/Atlas Map, Pre-Zoning Map and Specific Plan attached hereto as Exhibits A, B and C and does hereby authorize the mayor to sign the ordinance on behalf of the City.

SECTION 6: EFFECT OF ENACTMENT:

6.1 Except as specifically provided herein, nothing contained in this ordinance shall be deemed to modify or supersede any prior enactment of the City Council which addresses the same subject addressed herein.

SECTION 7: NOTICE OF ADOPTION:

7.1 Within fifteen days after the date of adoption hereof, the City Clerk shall certify to the adoption of this ordinance and cause it to be posted in three public places within the city.

SECTION 8: EFFECTIVE DATE:

This ordinance shall take effect thirty days after the date of its adoption.

APPROVED and ADDOPTED this _____ day of _____, 2015.

Mayor of the City of Moreno Valley

ATTEST:

City Clerk

APPROVED AS TO FORM:

City Attorney

Attachment: Proposed Ordinance_SP Pre-Zoning [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

ORDINANCE JURAT

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF MORENO VALLEY)

I, Jane Halstead, City Clerk of the City of Moreno Valley, California, do hereby certify that Ordinance No. _____ had its first reading on July 15, 2015 and had its second reading on _____, _____, and was duly and regularly adopted by the City Council of the City of Moreno Valley at a regular meeting thereof held on the _____ day of _____, _____ by the following vote:

AYES:

NOES:

ABSENT:














ABSTAIN:

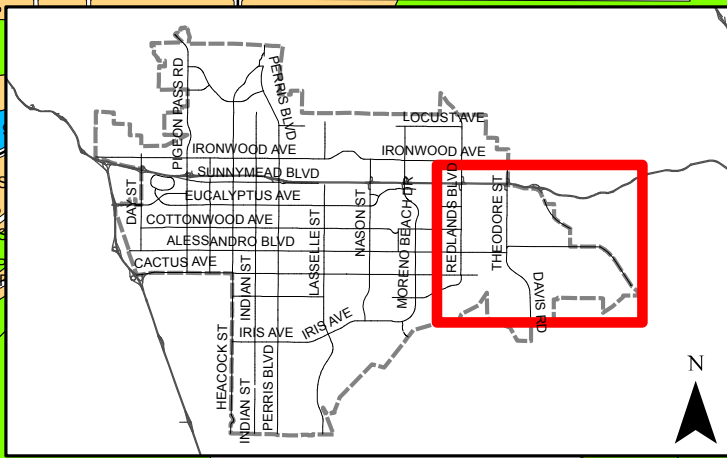
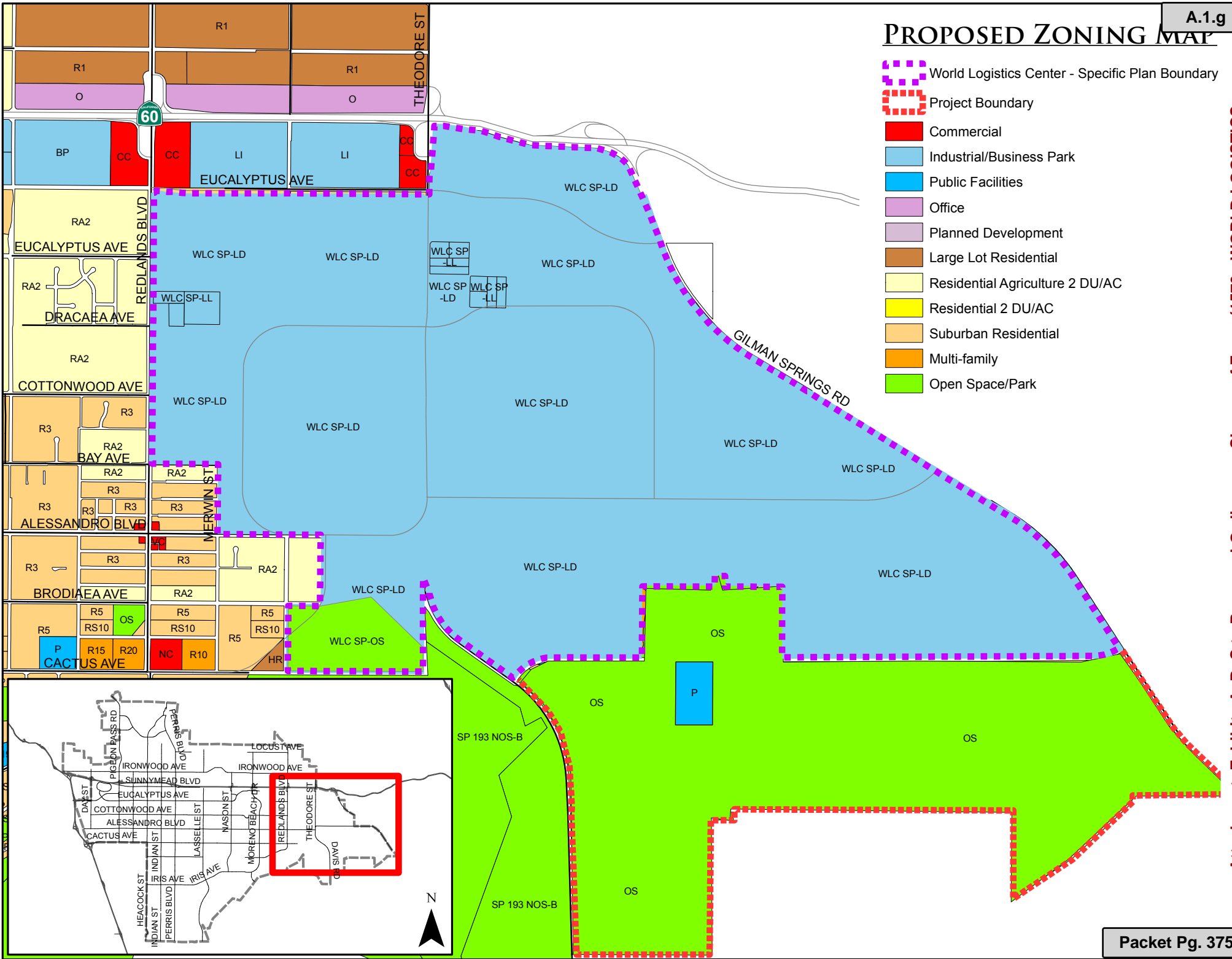
(Council Members, Mayor Pro Tem and Mayor)

CITY CLERK

(SEAL)

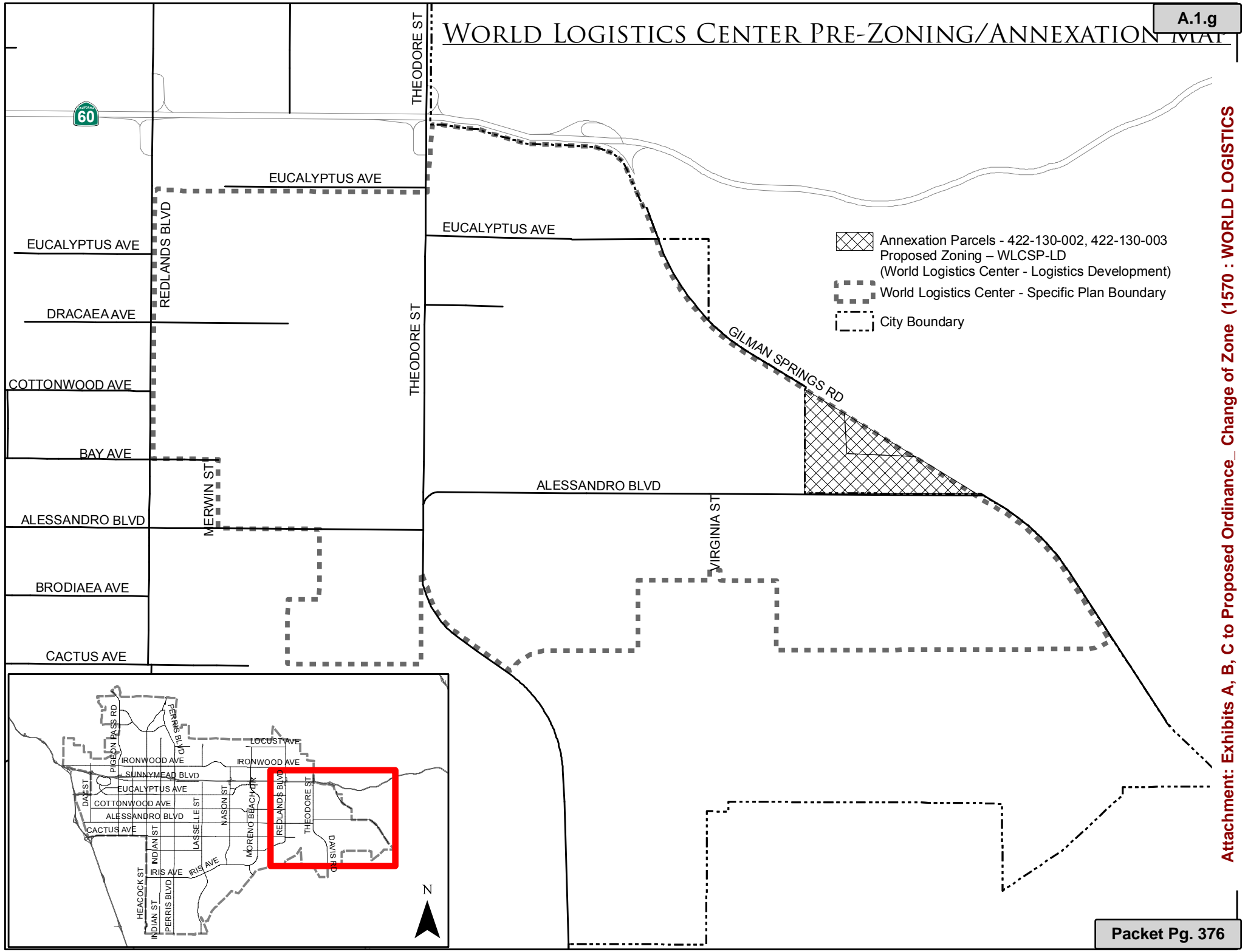
PROPOSED ZONING MAP

-  World Logistics Center - Specific Plan Boundary
-  Project Boundary
-  Commercial
-  Industrial/Business Park
-  Public Facilities
-  Office
-  Planned Development
-  Large Lot Residential
-  Residential Agriculture 2 DU/AC
-  Residential 2 DU/AC
-  Suburban Residential
-  Multi-family
-  Open Space/Park



Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS

WORLD LOGISTICS CENTER PRE-ZONING/ANNEXATION



Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS



THE WORLD
LOGISTICS
CENTER TM ®

SPECIFIC PLAN

September 2014

City of Moreno Valley
Riverside County, California



Adopted:

Date: _____

Ordinance # _____

Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL



Note: The renderings, photographs and illustrations contained herein present the general vision and intent for future development. As the project progresses to actual construction, precise plans and design specifications consistent with these illustrations will be submitted to the City of Moreno Valley for review and approval prior to the issuance of construction permits.



DISCLAIMER

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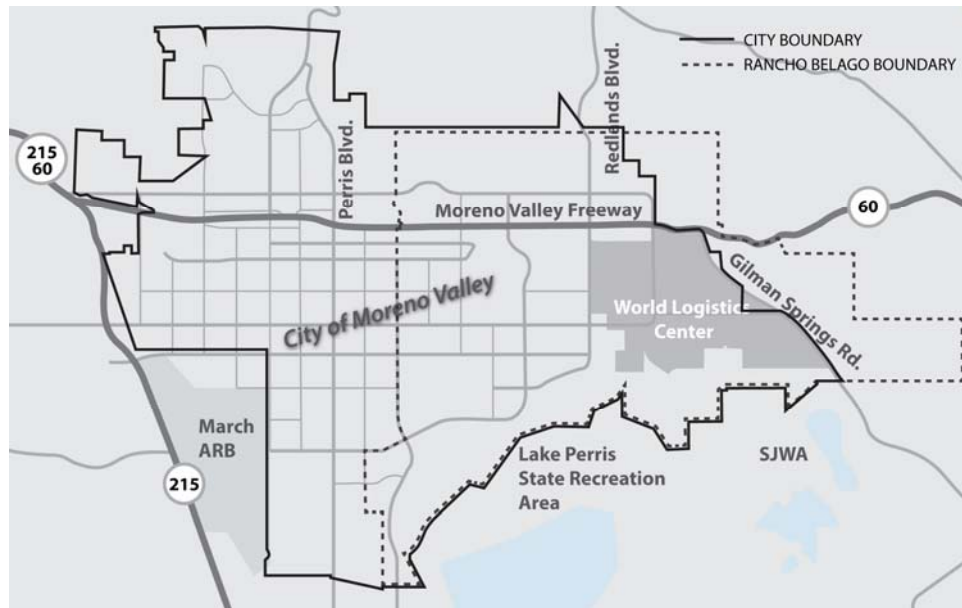
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1.0 INTRODUCTION

1.1 The World Logistics Center

The World Logistics Center is a master-planned development encompassing up to 40.6 million square feet of building area specifically designed to support large-scale logistics operations in a quality business environment.

The World Logistics Center Specific Plan covers 2,610 acres in Rancho Belago California, the eastern portion of Moreno Valley, located southerly of SR-60, between Redlands Boulevard and Gilman Springs Road northerly of the San Jacinto Wildlife Area (SJWA).



*Note All maps and illustrations are shown enlarged in the Appendix.

Exhibit 1-1 **Regional Map**

1.2 Specific Plan Overview

The World Logistics Center Specific Plan will guide the orderly development of the World Logistics Center project in carrying out the City's General Plan. Within the Specific Plan, land use designations are identified and design guidelines, regulations, conditions, and programs are included to direct the systematic development of the project. This Specific Plan implements all applicable elements of the General Plan and includes detailed information about the area's infrastructure improvements such as roads, water, sewer, utilities and flood control facilities.





The World Logistics Center Specific Plan has been adopted pursuant to Government Code Section 65450 which grants authority to cities to adopt specific plans for purposes of implementing the goals and policies of their General Plans. The Government Code sets forth the minimum requirements and review procedures for specific plans including the provision of a land use plan, infrastructure and public services plan, criteria and standards for development, and implementation measures.

The Specific Plan complies with the City of Moreno Valley's Municipal Code (Chapter 9.13) governing the content of specific plans and procedures for their adoption and enforcement.

1.3 Specific Plan Vision and Objectives

The vision for the World Logistics Center is to establish a world class corporate park environment specifically designed to support the unique logistics and operational needs of international companies and corporate users. The World Logistics Center features a clean and contemporary design aesthetic and an efficient, convenient circulation system to provide a highly functional logistics campus.

The objective of the Specific Plan is to establish the zoning criteria that will guide the orderly development of the World Logistics Center project and carry out the goals of the City's General Plan. Included are development standards for integrated site planning, architecture, and landscaping. These standards establish a consistent design concept that produces a clear image and a sense of prestige, efficiency and integrity for the World Logistics Center and each project within.





Exhibit 1-2 **Specific Plan Area**

1.3.1 Development Goals

The Specific Plan provides planning strategies and development standards created specifically for the property to incorporate its unique advantages, adapt to its constraints, meet the unique needs of a growing logistics industry, provide for the economic growth needs of the City, and create consistent and compatible land uses for the area in an environmentally responsible manner. Development of the World Logistics Center:

- Provides the land use designations and infrastructure plan necessary to support the City's Economic Development Action Plan,
- Establishes Moreno Valley as a prime location for the logistics industry,
- Creates a project that will provide a balanced approach to the City's responsibilities of fiscal viability, economic opportunity and environmental integrity,
- Provides thousands of ongoing employment opportunities,
- Provides thousands of construction job opportunities during the project's build-out phase,
- Establishes architectural and landscape design guidelines for the project, and
- Provides appropriate transition between the project and adjacent uses.



1.3.2 Green Building – Sustainable Development

Construction of the World Logistics Center will be in conformance with California’s “Cal-Green” building regulations, the most stringent, environmentally-friendly building code in the United States. Cal-Green is a comprehensive, far-reaching set of regulations which mandate environmentally-advanced building practices and regulations designed to conserve natural resources and reduce greenhouse gas emissions, energy consumption and water use.

In addition, all buildings in the World Logistics Center, of at least 500,000 square feet, shall be designed to meet or exceed the LEED Certified Building Standards as described in Section 12.8.

To augment its environmentally responsible building design, the project will incorporate sustainable design features to further reduce its environmental footprint, including but not limited to:

- Reduced water use for landscape irrigation,
- Street designs that harvest and channel runoff into landscape areas instead of storm drains,
- Accommodate the use of alternative means of transportation,
- Use recycled building materials to the extent feasible,
- Use local sources of building materials to the extent feasible,
- Minimize the use of impervious paved surfaces throughout the project,
- Incorporate on-site storm water capture and infiltration within landscape areas,
- Support alternative fuel use through the provision of an on-site alternative fueling site, and
- Provide for the use of roof-mounted solar systems or other alternative power systems.



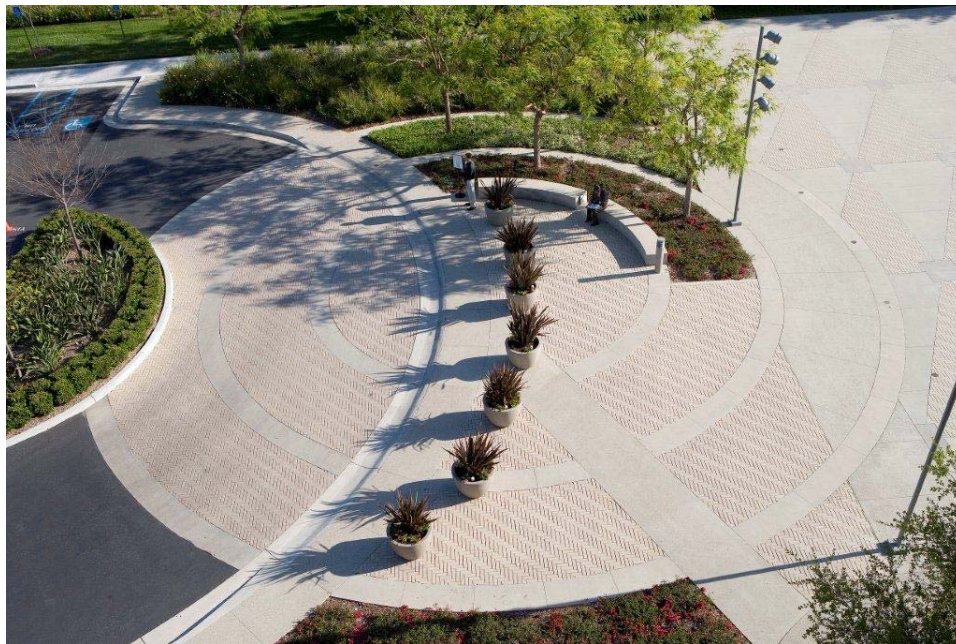
1.3.3 Sense of Place

The Specific Plan provides for the establishment of a strong and unique identity for the World Logistics Center. The Specific Plan guides the establishment of the project's sense of place by:

- Applying comprehensive, overall project design guidelines for architecture and project landscaping,
- Providing an efficient and simple circulation system specifically designed to accommodate truck circulation, and
- Using streetscapes, banners, entry monumentation, and architecture to strengthen the project identity.

1.3.4 Project Infrastructure

The Specific Plan identifies the backbone infrastructure systems needed to serve the project. Preliminary plans illustrate the proposed expansion of water, sewer, drainage and utility facilities. The infrastructure plan also provides for vehicular (car, truck and bus) and non-vehicular (bicycle and pedestrian) circulation, including a five-mile extension of the City's multi-use trail system.



The Specific Plan provides for the establishment of a strong and unique design identity for the World Logistics Center.



1.4 Existing Setting

1.4.1 Existing Land Use

The World Logistics Center Specific Plan covers approximately 2,610 acres within Rancho Belago in eastern Moreno Valley in Riverside County, California. The project area is located southerly of SR-60, between Redlands Boulevard and Gilman Springs Road, north of the San Jacinto Wildlife Area. Existing uses include dry-farmed agricultural land, several scattered rural residential properties and a Metropolitan Water District (MWD) water distribution facility.



Exhibit 1-3 *Surrounding Land Uses*

Surrounding land uses include:

- North:** Highland Fairview Corporate Park (including Skechers), SR-60, vineyard and rural residential uses
- South:** Natural gas distribution facilities, San Jacinto Wildlife Area, Lake Perris State Recreation Area
- East:** Vacant hillside (Badlands), scattered residential uses
- West:** Suburban residential development, vacant land



1.4.2 Existing Fault Zones

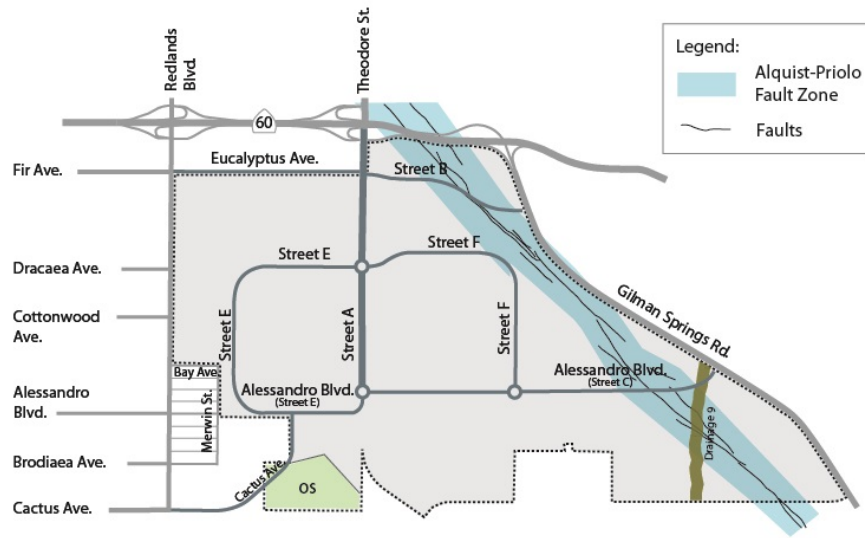


Exhibit 1-4 Existing Fault Zones

Based on preliminary geotechnical investigations conducted for the World Logistics Center property, a portion of the site is subject to geotechnical constraints that may affect the placement of future buildings on the property. Exhibit 1-4 “Existing Fault Zones” illustrates the location of the Alquist-Priolo Fault Zone on the site and shows where several concealed, inferred and known faults are believed to exist. Prior to the approval of all project-specific development proposals, detailed geotechnical investigation and analysis will be prepared and submitted to the City for review. The results of those studies will be incorporated into the detailed plans for each project.



2.0 LAND USE PLAN

2.1 World Logistics Center Land Use Designations

The World Logistics Center Specific Plan provides for the development of a master-planned project specifically designed to support logistics uses by incorporating landscape and architectural standards, project-wide criteria for streets, drainage, public infrastructure, lighting and signage, and project features responsive to the needs of the logistics industry.

The Specific Plan includes a land use plan providing for three land use designations: Logistics Development (LD), Light Logistics (LL), and Open Space (OS).

A Circulation Plan provides a roadway network that moves cars and trucks into and through the World Logistics Center in a safe, efficient manner.

An Infrastructure Plan is included that addresses the current status of local infrastructure services such as water, sewer, storm drain, electricity and telephone/cable TV and outlines the backbone improvements necessary for these systems to serve the World Logistics Center project.

Guidelines for landscaping and architectural design are provided to ensure that a distinct consistent aesthetic theme is realized throughout the project.

Additionally, the Plan establishes an implementation program that provides the processes and procedures for the review and approval of project-specific development proposals, carrying out the purpose and intent of the Specific Plan.

All of these elements function together to create a comprehensive development program to ensure that the World Logistics Center becomes the contemporary standard for logistics campus projects.



LAND USE PLAN

2-1



Planning Area (PA)	Land Use	Area	Building SF
Logistics Development			
1	LD	77.8	1,100,000
2	LD	193.5	4,200,000
3	LD	120.3	1,600,000
4	LD	301.5	5,600,000
5	LD	64.2	1,100,000
6	LD	115.3	500,000
7	LD	10.3	50,000
8	LD	142.9	2,150,000
9	LD	485.8	10,400,000
10	LD	139.9	2,200,000
11	LD	500	8,000,000
12	LD	231.3	3,500,000
		2,382.8	40,400,000
Light Logistics			
20	LL	16.1	45,500
21	LL	10.5	77,250
22	LL	10.5	77,250
		37.1	200,000
Open Space			
30	OS	74.3	
		74.3	
Right of Way			
ROW		115.8	
		115.8	
Grand Total		2,610.0	40,600,000



Exhibit 2-1 Land Use Plan

Land Use Designations:

Logistics Development - (LD)

The LD designation provides for high-cube logistics warehouse uses consisting of buildings of 500,000 square feet or greater. Warehousing and logistics activities consistent with the storage, assembly and processing of manufactured goods and materials prior to their distribution to other facilities are permitted within this category along with facilities for the outdoor storage of trucks, trailers and shipping containers. Ancillary office, employee services and property management facilities are permitted in connection with primary uses. Development standards for the LD category are included in Section 2.2 of this Specific Plan.

Light Logistics - (LL)

The LL designation provides for warehouse uses less than 500,000 square feet in size, self-storage and vehicle storage uses. Ancillary office, employee services and property management facilities are permitted in connection with primary uses. Development standards for the LL category are included in Section 2.3 of this Specific Plan.

Open Space - (OS)

The OS designation identifies a 74.3 acre area in the southwestern portion of the site which is a portion of Mt. Russell. The intent of the OS designation is to preserve this area as a permanent Open Space. This area shall comply with the City of Moreno Valley Open Space Standards and permitted uses.



LAND USE PLAN

2-3

2.2 Logistics Development (LD) Category



2.2.1 Purpose and Intent

The LD category is intended to provide for the development of large, high-cube logistics warehouse buildings.

2.2.2 Permitted Uses

- a. High-cube warehouses
- b. Vehicle, equipment and container storage (as a separate use or in connection with other permitted uses)
- c. Short-term and long-term construction yards within, or immediately adjacent to approved construction sites
- d. Cellular transmission facilities and structures
- e. Public utility uses and structures
- f. Fire station (see Section 2.2.4)
- g. Logistics support (see Section 2.2.5)
- h. Property maintenance facilities (POA facilities, offices, vehicle storage, nurseries, etc.)

2.2.3 Development Standards (see Section 2.2.5 for standards applicable to logistics support)

- a. Minimum Lot Size – one acre
- b. Minimum Lot Dimensions – width – 200 feet
depth – 200 feet
- c. Minimum Building Size
 1. High-cube logistics uses: 500,000 square feet
 2. All other uses – no minimum



LAND USE PLAN

2-4

- d. Floor Area Ratio (FAR)
 - 1. High-cube logistics uses – no minimum; 1.0 FAR maximum.
- e. Building Height
 - 1. Vehicle/container storage uses – maximum 25 feet
 - 2. High-cube logistics uses – maximum 60 feet or 80 feet per Exhibit 5-3
 - 3. Cell towers – refer to Municipal Code.
- f. Building Setbacks (Minimum)
 - 1. From any public street: 60 feet.
 - 2. From other property lines: no minimum
 - 3. From residentially occupied property within the WLC: all buildings shall be set back a distance equal to or greater than the height of the proposed building.
 - 4. From SJWA property: 400 feet (See Exhibit 4-16)
 - 5. From residentially zoned property: 250 feet measured from the City/County zoning boundary (See exhibits in Section 4.2.4)
 - 6. From SDG&E Compressor Station buildings: No buildings shall be located less than 1000 feet from existing buildings at the SDG&E Compressor Station. (See Exhibit 4-16)
- g. Maximum Lot Coverage – None
- h. Landscape Coverage
 - 1. High-cube logistics uses – 10% minimum
 - 2. All other uses – no minimum
 - 3. Landscape buffer - 20 feet minimum from street
- i. Accessory Structure Size – no minimum, no maximum
- j. Accessory Structure Setbacks – same as primary buildings
- k. Legal nonconforming uses: the provisions of Municipal Code Section 9.02.180 “Legal nonconforming uses, improvements and parcels” shall apply.



2.2.4 Fire Station Site

A 1.5-acre site for a future fire station will be provided in the easterly portion of the Specific Plan. The fire station will be built during Phase 1 (see Exhibit 8-1) and will be approximately 11,000 square feet in size. The exact location and configuration of the facility will be established in connection with the design and development of adjacent properties. The precise timing for the construction of a fire station will be determined by several factors, including the phasing of WLC development, the construction of other planned fire stations, and the location and size of WLC buildings. The Fire Department will review the need for a fire station with each site specific Plot Plan application.



Exhibit 2-2 Fire Station Site



2.2.5 Logistics Support



2.2.5.1 Purpose and Intent

Logistics support sites shall be located on property within the LD category. Logistics support sites provide services within the WLC including fueling facilities (including alternative fuels such as, but not limited to, LNG, CNG, biofuel, etc.) and limited commercial uses oriented to truck operators serving the World Logistics Center.

2.2.5.2 Project Location

The exact locations and configurations of the facilities will be established in connection with the design and development of adjacent properties, subject to the following criteria. The sites shall be located:

- a) Within a LD designated area
- b) With frontage on an internal collector street
- c) On sites with adequate size, access, sight distance, and grades to safely accommodate large trucks as determined through the Plot Plan process.

2.2.5.3 Permitted Uses

- a. Motor fuel sales
 - a. Any Plot Plan application for fuel sales and/or fuel storage shall include a risk assessment evaluating potential health or safety risks from the operation of such uses at the proposed sites.
- b. Retail sales when operated in connection with a primary fuel sales use
- c. Construction yards within, or immediately adjacent to approved construction sites



- d. Cellular transmission facilities and structures
- e. Public utility uses and structures

2.2.5.4 Prohibited Uses

- a. Vehicle service/maintenance/repairs/storage
- b. Drive-thru facilities
- c. Overnight truck parking
- d. Towing services

2.2.5.5 Development Standards

- a. Minimum Lot Size – 1.0 acre
- b. Minimum Lot Dimension – width – 200 feet
depth – 200 feet
- c. Building Size – no minimum, 3,000 sq. ft. maximum not including canopy area
- d. Floor Area Ratio
 - 1. No minimum; 1.0 FAR maximum.
- e. Building Height – 25 feet maximum
- f. Setbacks (Minimum):
 - 1. 20 feet from all property lines except adjacent to any residential property where buildings shall be set back a distance equal to or greater than the height of the proposed building.
 - 2. All fueling facilities shall be a minimum of 250 feet from any residentially occupied or zoned properties.
- g. Maximum Lot Coverage – None
- h. Landscape Coverage - no minimum
 - 1. Landscape Buffer – 20 feet minimum from street
- i. Canopies – Fueling areas shall be covered.
- j. Accessory Structure Size – no minimum, no maximum
- k. Accessory Structure Setbacks – same as primary buildings
- l. Prohibited Uses –
 - 1. Vehicle service/ maintenance/ repairs/ storage
 - 2. Drive-thru facilities
 - 3. Overnight truck parking
 - 4. Towing services



2.3 Light Logistics (LL) Category



2.3.1 Purpose and Intent

The LL “Light Logistics” designation provides for warehouse buildings and other storage uses and buildings less than 500,000 square feet in size.

2.3.2 Permitted Uses

- a. High-cube warehouses
- b. Vehicle, equipment and container storage (as a separate use or in connection with other permitted uses)
- c. Short-term and long-term construction yards within, or immediately adjacent to approved construction sites
- d. Cellular transmission facilities and structures
- e. Public utility uses and structures
- f. Fire station
- g. Property maintenance facilities (POA facilities, offices, vehicle storage, nurseries, etc.)

2.3.3 Development Standards

- a. Minimum Lot Size – one acre
- b. Minimum Lot Dimension – width – 200 feet
depth – 200 feet
- c. Minimum Building Size– None
- d. Floor Area Ratio
 1. Warehouses – no minimum; 1.0 FAR maximum.
- e. Building Height – sixty feet maximum



- f. Building Setbacks (Minimum)
 - 1. From any public street: twenty feet.
 - 2. From other property lines: no minimum
 - 3. From residentially occupied property within the WLC: all buildings shall be set back a distance equal to or greater than the height of the proposed building.
 - 4. From residentially zoned property: 250 feet measured from the City/County zoning boundary (See exhibits in Section 4.2.4)
 - 5. Designated emergency access drives and employee/visitor parking are permitted in all setback areas.
- g. Maximum Lot Coverage – None
- h. Landscape Coverage - No Minimum
 - 1. Landscape buffer – 20 feet minimum from street
- i. Accessory Structure Size – no minimum, no maximum
- j. Accessory Structure Setbacks – same as primary buildings
- k. Legal nonconforming uses - the provisions of Municipal Code Section 9.02.180 “Legal nonconforming uses, improvements and parcels” shall apply.



2.4 Standards and Guidelines for Open Space

All uses and development with the Open Space (OS) designation shall comply with the standards, guidelines and procedures contained in Section 9.06.030 of the Municipal Code.

The entirety of Planning Area 30 will be offered for dedication in fee to the State of California for expansion of its adjacent ownership. If the offer is not accepted, the land may be dedicated to a local conservation agency, a property owners' association or retained in private ownership.



Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL

2.5 Special Edge Treatment Areas

The Specific Plan includes three designated areas where special setbacks, facilities, grading and landscaping will be provided to create special edge treatment areas between the World Logistics Center and adjacent, existing land uses. These edge areas are shown on Exhibit 2-3 and detailed cross sections are shown in Section 4.2.4.

2.5.1 Western Edge

The Western edge is adjacent to residentially-zoned property. This edge will feature a restricted use area in which no buildings, truck courts, loading areas, truck circulation areas, or truck or trailer storage uses are permitted. Employee/visitor parking, emergency access, landscaping, drainage facilities, and property maintenance access are permitted in this area. The restricted use area will be at least 250 feet from any residential zoning boundary.

2.5.2 SR-60 Edge

The SR-60 edge through the WLC will continue the general design established with the Highland Fairview Corporate Park project immediately to the west. Similar to the HFCP project, future development areas within the WLC will be lower than the freeway, with landscaped slopes providing screening of adjacent buildings and circulation areas. To ensure a consistent appearance of this edge, the landscape treatment of these slopes will continue the design and plant palette utilized at the HFCP project.

2.5.3 SJWA Edge

The San Jacinto Wildlife Area (SJWA) edge is along the southerly boundary of Planning Areas 10 and 12 (See Exhibit 2-1) and adjacent to state-owned open space currently in agricultural use. This edge will feature a restricted use area of at least 250 feet from these state-owned properties. No buildings, truck courts, loading areas, employee/visitor parking, truck circulation areas, or truck or trailer storage uses are permitted within this area. Emergency access, landscaping, drainage facilities, and property maintenance access are permitted. In addition to this 250 foot restricted use area, additional setback will be provided such that all buildings are a minimum of 400 feet from the SJWA boundary.

2.5.4 Gilman Springs Road Edge

The Gilman Springs Road edge will feature a restricted use area of at least 250 feet from any residential zoning boundary. No buildings, truck courts,



loading areas, truck circulation areas, or truck or trailer storage uses are permitted within this area. Employee/visitor parking, emergency access, landscaping, drainage facilities, and property maintenance access are permitted. This restricted use area may be reduced subject to the review of project-specific air quality and noise analyses.

2.5.5 Concept Plans

Prior to approval of any subdivision or Plot Plan including or adjacent to a Special Edge Treatment Area, a concept plan for that entire edge area shall be submitted to and approved by the Planning Official. The concept plan shall include proposed grading, improvements, landscaping, drainage facilities, lighting, signage, trails, vehicular / pedestrian access, and any other proposed improvements. Site-specific projects shall be consistent with these concept plans.

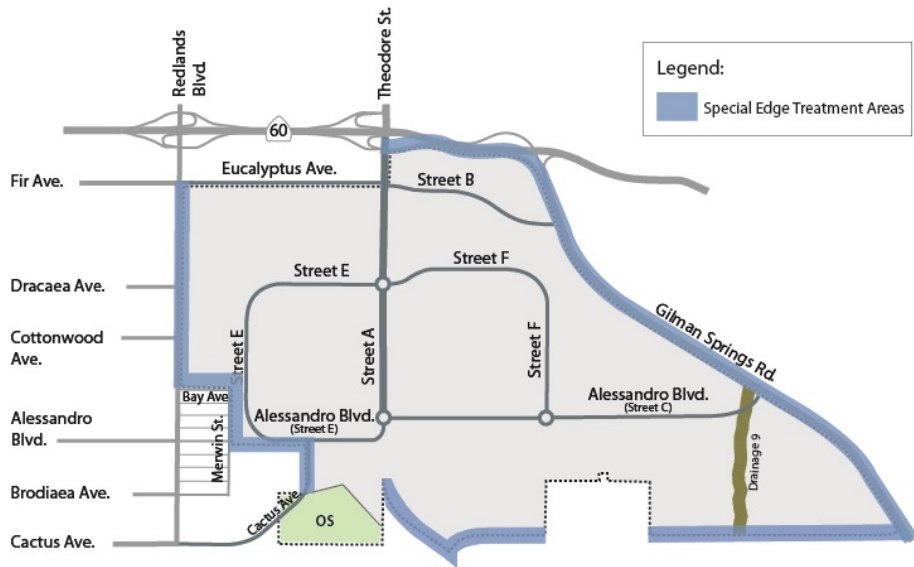


Exhibit 2-3 Special Edge Treatment Areas



3.0 INFRASTRUCTURE PLAN

The Infrastructure Plan serves as a guide for the development of detailed plans for roadways, domestic water, wastewater, storm water and utilities that will serve the Specific Plan area. The conceptual infrastructure plans generally identify the location of infrastructure facilities within the project. Subsequent subdivisions and site development plans will establish the exact size and location of all such facilities.

3.1 Circulation

The Circulation Plan provides standards and guidelines that ensure the safe and efficient movement of people and vehicles into and through the World Logistics Center, addressing light trucks and passenger vehicles, heavy trucks, public transit, and non-vehicular circulation (pedestrians and bicycles). The Circulation Plan includes new streets and the extension of existing streets that will be renamed.

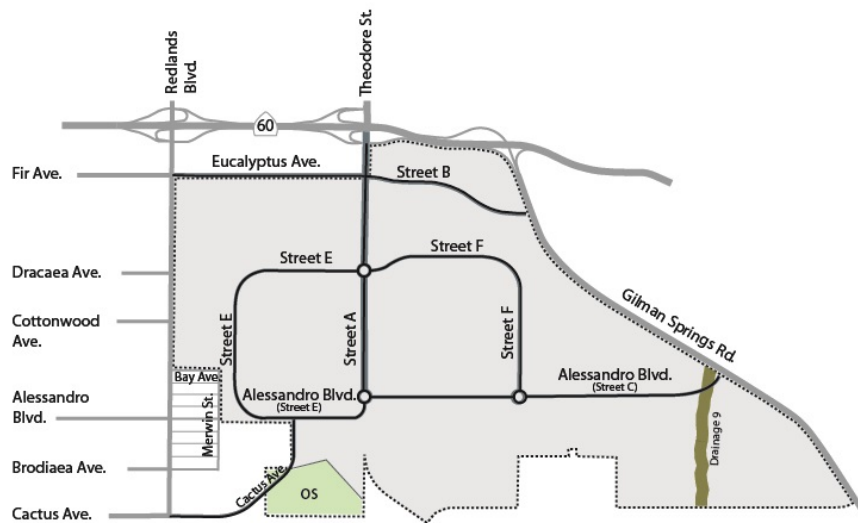


Exhibit 3-1 Circulation Plan

Five points of access bring vehicles into the World Logistics Center. The primary access to the project will be via Theodore Street, with additional accesses at Eucalyptus Avenue, Cactus Avenue and Gilman Springs Road.



3.2 Freeway

State Route 60 (SR-60) runs along the northerly border of the World Logistics Center. Existing interchanges adjacent to the project are located at Redlands Boulevard, Theodore Street and Gilman Springs Road. Theodore Street will be the primary connection to SR-60 for the World Logistics Center.

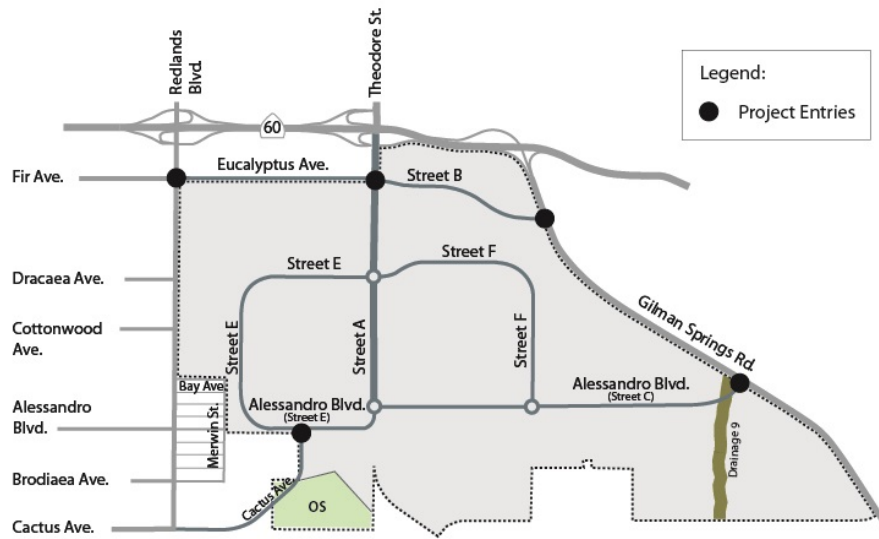


Exhibit 3-2 Project Entries

3.3 Vehicular Circulation

3.3.1 Passenger Car and Truck Circulation

The World Logistics Center is designed to provide easy vehicular access to the project via five access points around the site.

A major feature of the plan is a road system that directs all heavy truck traffic to and from SR60 and Gilman Springs Road eliminating the need to travel through residential areas to the west. Cactus Avenue and Redlands Boulevard south of Eucalyptus Avenue are not designated Truck Routes. Cactus Avenue will be designed and/or signed to prohibit use by heavy trucks.

The primary truck entry to the site is through the Theodore Street/SR60 interchange. Secondary truck access points are provided at Gilman Springs Road via intersections with Street B and Alessandro Boulevard.



Access for cars and light/medium trucks is provided via the extension of Cactus Avenue in the southwest portion of the project. No heavy trucks are allowed to use this access. Redlands Boulevard south of Eucalyptus Avenue allows only passenger vehicle and light/medium truck access as it is not a City-designated truck route.

Alessandro Boulevard is a historic roadway (per Resolution CPAB 88-2) and is subject to Special Regulations contained in Section 12.9 of this Specific Plan.

3.3.2 Street Designations

A network of arterial and collector streets serve the World Logistics Center. Their primary function is to serve traffic within the project area, but some provide regional connectivity through the project. Street sections within the project are shown on the following pages. Specific design details of these roadways will be determined in subsequent subdivision and site development approvals. Additional rights-of-way may be required for turn lanes. Turn lanes are provided in the median of all arterial streets, subject to City approval.

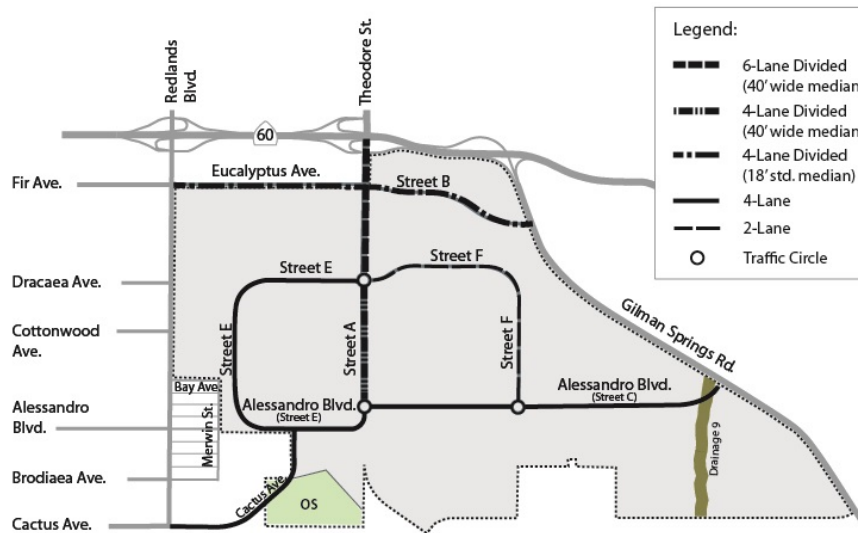


Exhibit 3-3 Street Configurations



Street A (Theodore Street)

Street A (Theodore Street) runs north-south through the World Logistics Center. It is a 6-lane and 4-lane divided arterial roadway as shown on Exhibit 3-3, with additional widening and lane improvements at its intersections with SR-60, Eucalyptus Avenue and local interior collector streets. These interior intersections will be upgraded with roundabouts, providing for more efficient traffic flow.

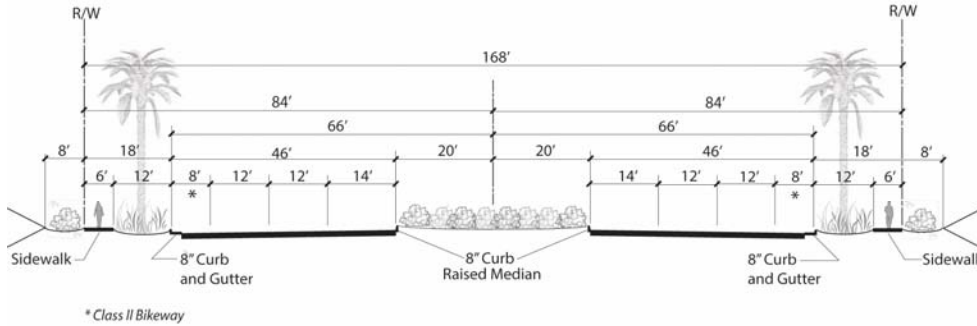


Exhibit 3-4a Street "A" (Theodore Street) North of Street "E"

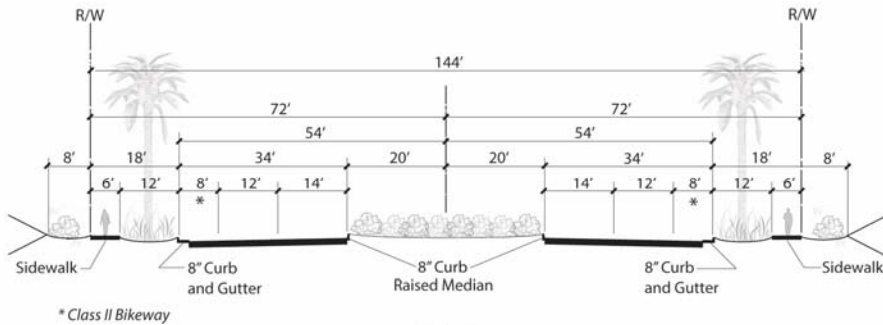


Exhibit 3-4b Street "A" (Theodore Street) South of Street "E"



Eucalyptus Avenue

Eucalyptus Avenue is a 4-lane divided arterial roadway running east-west northerly of the WLC Specific Plan area from Theodore Street on the east to Redlands Boulevard on the west. A portion of this street was constructed with the Highland Fairview Corporate Park project. The City's General Plan shows this street ultimately extending westerly across the City.

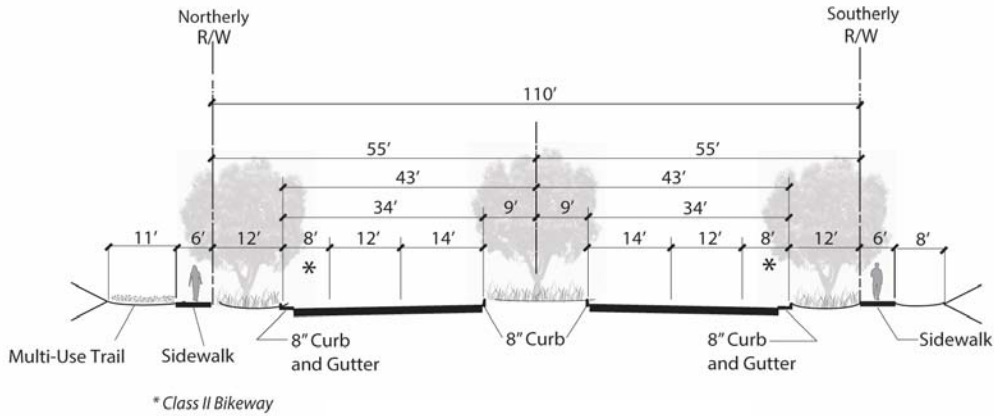


Exhibit 3-5 Eucalyptus Avenue

Street B (Eucalyptus Avenue Extension)

Street B (Eucalyptus Avenue Extension) is a 4-lane divided arterial roadway, running east-west through the northerly portion of the World Logistics Center from Gilman Springs Road on the east to existing Eucalyptus Avenue at Street A (Theodore Street) on the west. The City's General Plan shows this street ultimately extending westerly across the City.

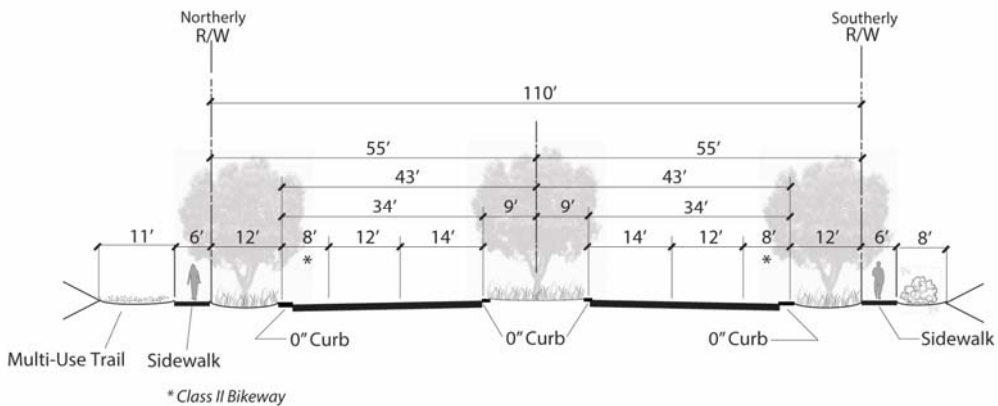
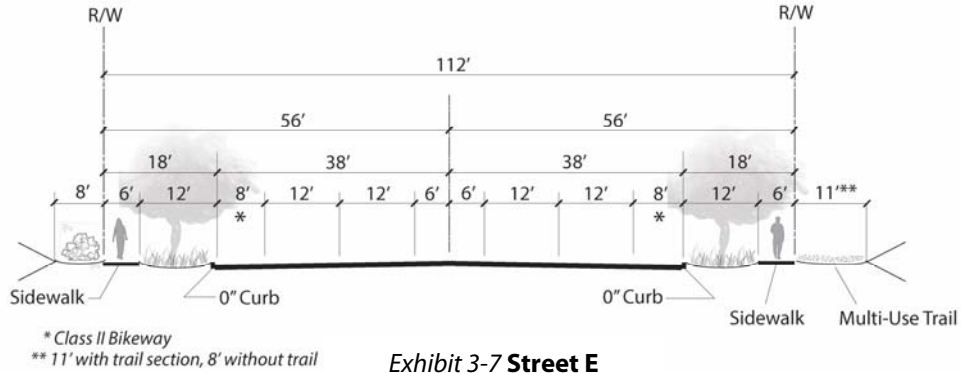


Exhibit 3-6 Street B (Eucalyptus Avenue Extension)



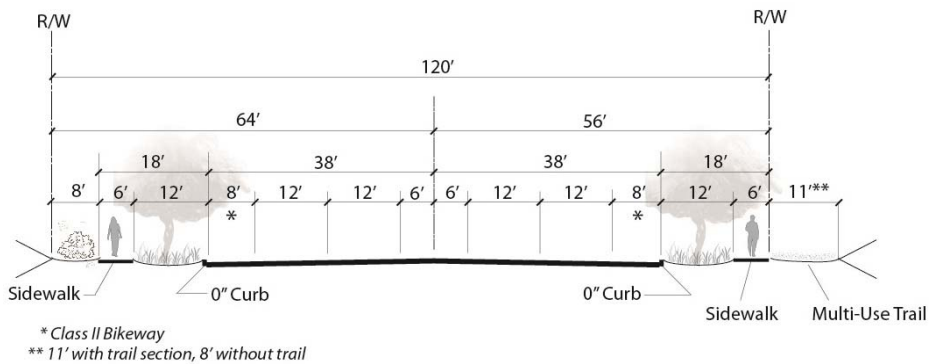
Street E

Street E is a 4-lane undivided arterial roadway providing direct access to development areas in the westerly portion of the project. A roundabout is planned at its intersection with Street A. Design details of this roadway will be determined by subsequent subdivision and site development approvals.



Alessandro Boulevard

Alessandro Boulevard is a 4-lane undivided roadway running east-west through the World Logistics Center, from Gilman Springs Road to Cactus Avenue. This roadway is a City-designated historic roadway (Resolution CPAB 88-2) and is subject to Special Regulations contained in Section 12.9 of this Specific Plan. Vehicular access will be prohibited on a portion of Alessandro Boulevard, east of Merwin Street in order to reduce through traffic and associated impacts on the residential portion of Alessandro Boulevard. Roundabouts are planned with its intersection with Street A and Street F.



Note: See special regulations applicable to Alessandro Boulevard in Section 12.9 of the Specific Plan



Street F

Street F is a two-lane internal collector road providing direct access to development areas in the central portion of the project. It intersects with Street A (Theodore Street) at its northerly end and with Alessandro Boulevard at its southerly end. Both of these intersections will be roundabouts. Specific design details of this roadway will be determined by subsequent subdivision and site development approvals.

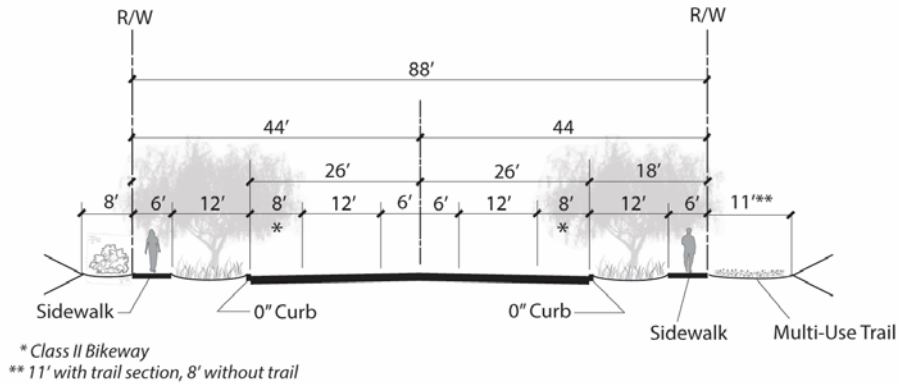


Exhibit 3-9 Street F

Cactus Avenue (Extension)

The extension of Cactus Avenue will be a 4-lane undivided minor arterial roadway connecting existing Cactus Avenue with Alessandro Boulevard and Street E. Heavy trucks will be prohibited from using Cactus Avenue to enter and exit the WLC. Special design (where possible) and signage will reinforce this restriction as established by the City.

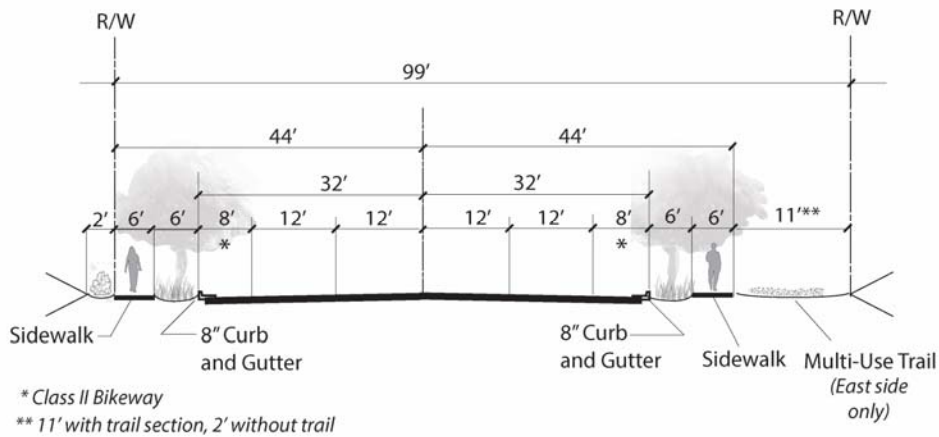


Exhibit 3-10 Cactus Avenue (Extension)



3.3.3 Truck Circulation

The efficient, safe circulation of large commercial vehicles is a major component of the World Logistics Center. The circulation system is designed to move large vehicles between the regional highway system and the businesses of the World Logistics Center while directing heavy trucks away from nearby residential neighborhoods. The World Logistics Center plan directs all heavy truck traffic to SR-60 and Gilman Springs Road and away from Redlands Boulevard (south of Eucalyptus Avenue) and Cactus Avenue. These prohibitions are incorporated in the City's Truck Route Ordinance.

Signage or road design, as determined by the City, will prohibit heavy trucks from using Cactus Avenue to enter or exit the project. The City's Truck Route Ordinance will reinforce these prohibitions.

The interior roadways of the WLC will be City-designated Truck Routes.

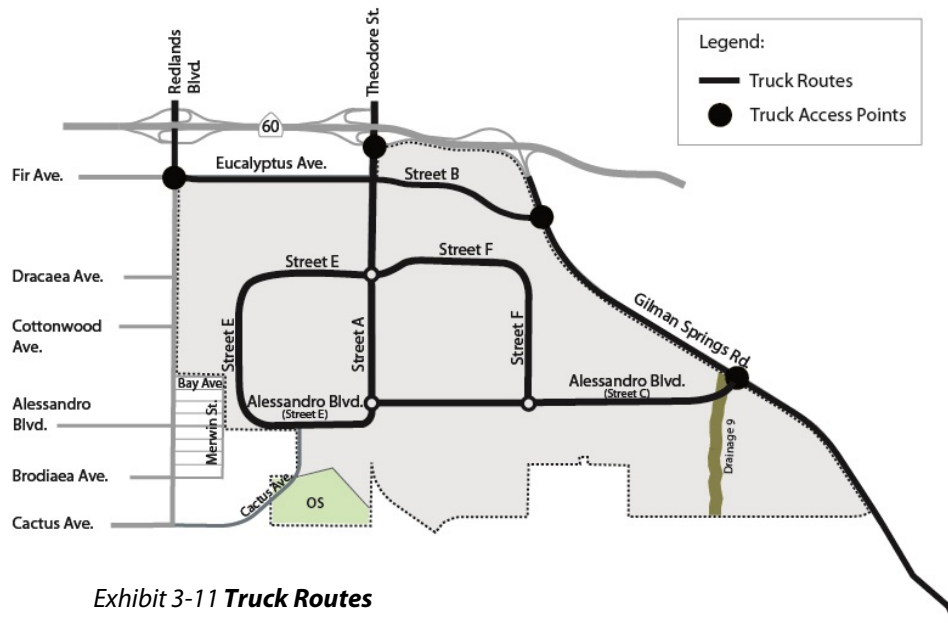


Exhibit 3-11 Truck Routes



The Plan includes three roundabouts for safe and efficient vehicular movement throughout the project. They are located at Street A (Theodore Street), Alessandro Boulevard, Street E, and Street F. The detailed design of these roundabouts will be reviewed by the City in connection with site specific design projects.

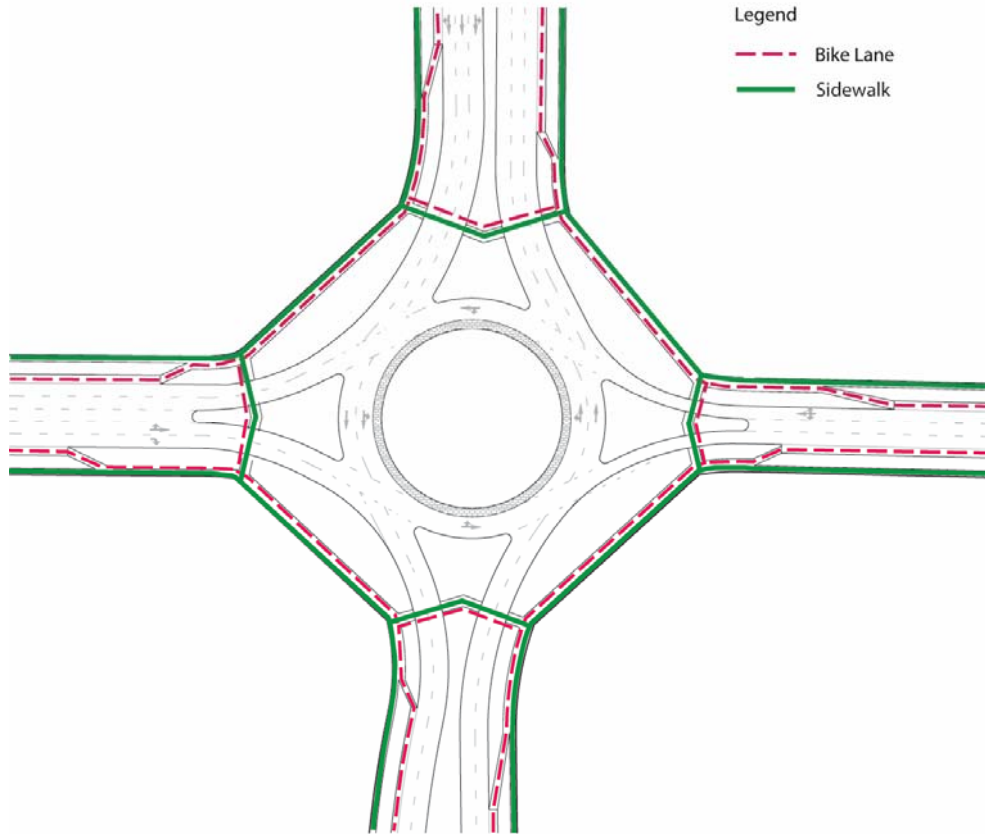


Exhibit 3-12 Roundabout Diagram



Example of Roundabout Circulation



The World Logistics Center Specific Plan prohibits parking on all streets except at designated truck parking lanes. These lanes provide parking areas for vehicles for a limited duration (no overnight parking) when access to project sites is not available. They are designed to be offset from the traffic lanes to allow for unobstructed thru-traffic and shall be located no closer than 200 feet from intersecting street curb returns. The locations and detailed designs will be reviewed in connection with subdivision and site development permits. No truck parking lanes will be located on Street A.

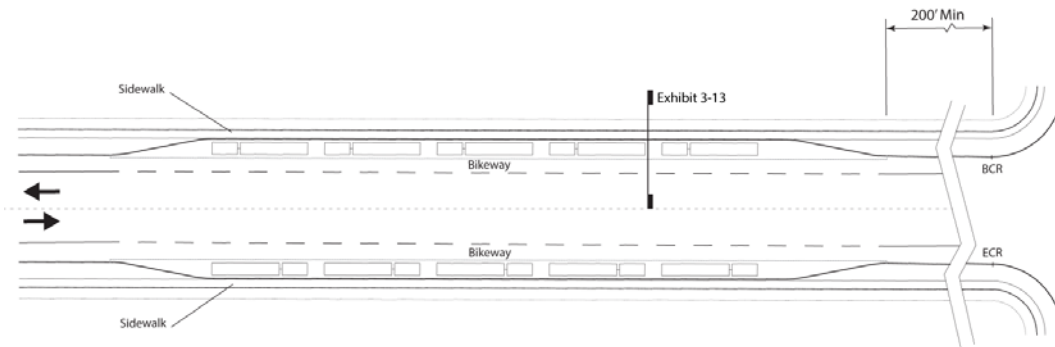


Exhibit 3-13 Truck Pullout Diagram

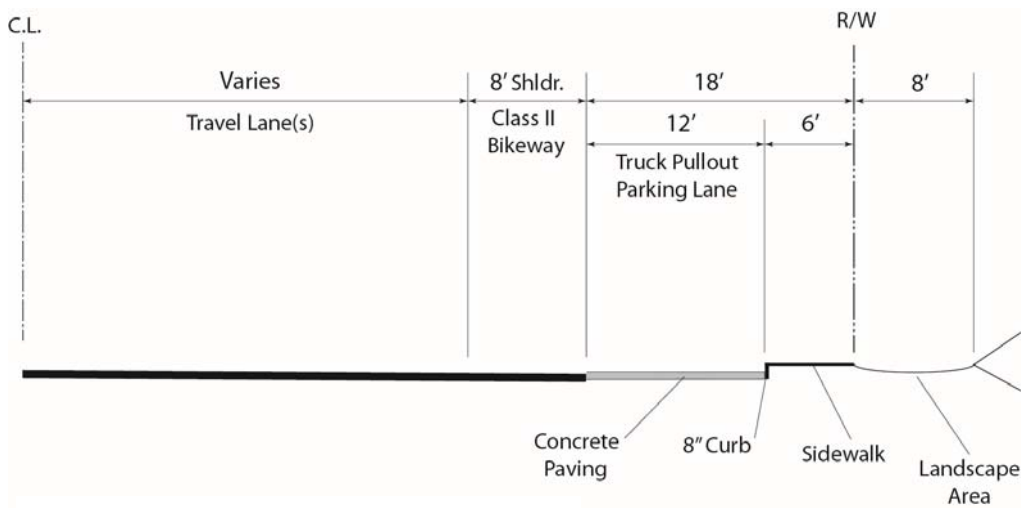


Exhibit 3-14 Truck Parking Lane Section



3.3.4 Mass Transit Circulation

All streets in the World Logistics Center are designed to accommodate bus service. Regional bus service in Western Riverside County is provided by the Riverside Transit Agency (RTA), however they do not currently operate any routes in the immediate vicinity of the World Logistics Center. RTA will determine if and when bus service will be provided. Facilities to support future bus service to the project pursuant to RTA's "Design Guidelines for Bus Transit" will be incorporated, as needed, into street design in connection with site-specific development proposals. Covered shelters shall be provided when bus routes are activated. A standard design for shelters shall be reviewed and approved by RTA and the City prior to installation of the first shelter.

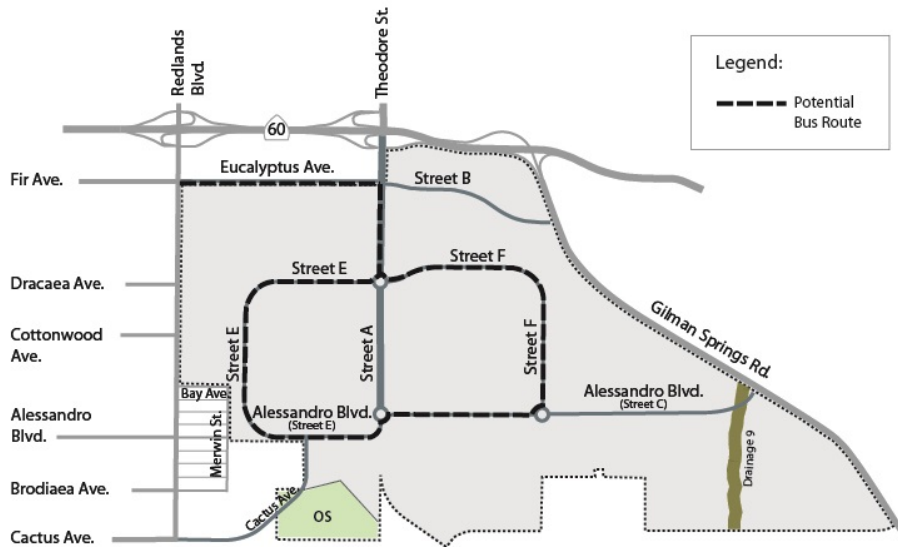


Exhibit 3-15 Potential Bus Route

Exhibit 3-14 illustrates a potential bus route that would conveniently serve the majority of building areas within the WLC. This is only a conceptual route. The RTA will determine if and when bus service will be extended to the WLC area and its route.



3.3.5 Emergency Access

An emergency vehicular access connection will be provided from Street E to public roads to the west. This connection will also be designed to accommodate pedestrian and bicycle use to facilitate non-vehicular circulation within the WLC project. A conceptual design for an emergency access connection is shown in Figure 3-16.

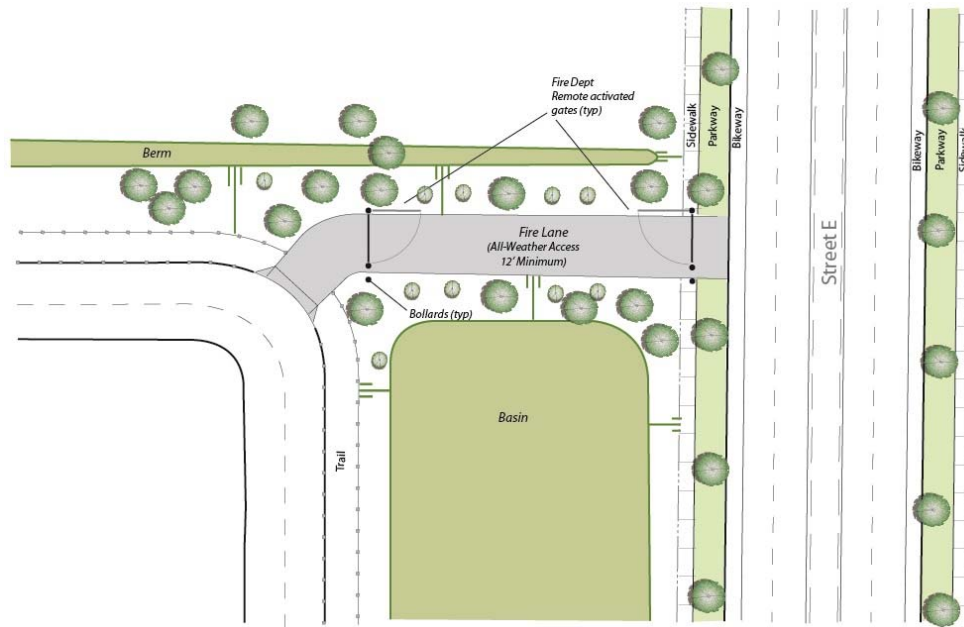


Exhibit 3-16 **Emergency Access (Conceptual)**

3.4 Non Vehicular Circulation

3.4.1 Pedestrian Circulation

The World Logistics Center provides a network of sidewalks on all project streets, as required to comply with ADA and other applicable codes, to connect all areas of the project to surrounding areas and to interconnect all buildings within the project. Details of these sidewalks will be reviewed and approved by the City in connection with subdivision and site development approvals.



3.4.2 Multi-Use Trails

To provide public trail access to the Lake Perris Recreational Area, an extension of the City’s Redlands Boulevard multi-use trail will cross Redlands Boulevard at Cottonwood Avenue and continue southerly and easterly as shown on Exhibit 3-16.

The existing multi-use trail along the north side of Eucalyptus Avenue will be extended along Street B to Gilman Springs Road and then southerly to connect with the trail head as shown in Exhibit 3-16.

In the future a connection between the trail head and SJWA may be constructed by others.

Details of these trail alignments will be established with site-specific development proposals. The multi-use trails within the World Logistics Center will comply with existing city standards and will be constructed concurrently with adjacent development projects. Once constructed, the trails and trail head will be operated and maintained by the City and funded by a special financing district.

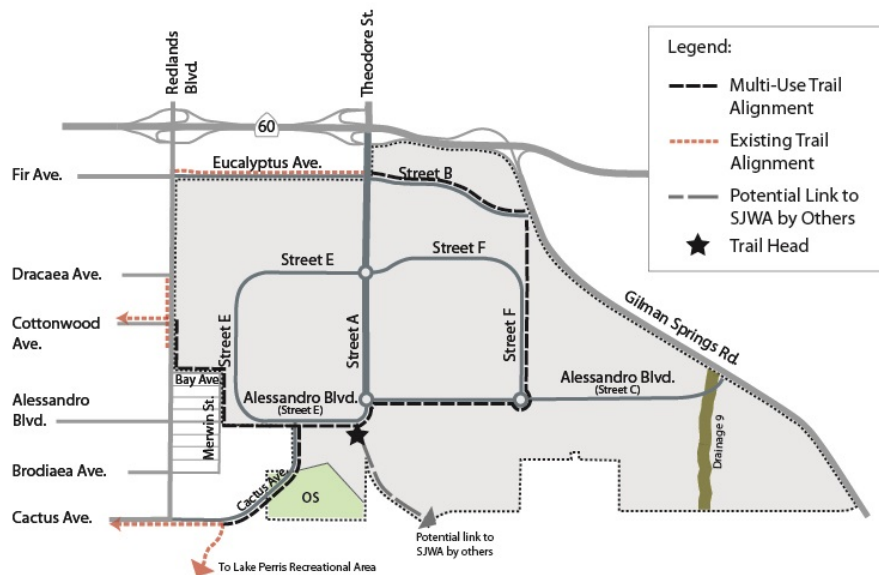


Exhibit 3-17 Multi-Use Trail Plan



3.4.3 Bicycle Circulation

Class II bikeways are provided along all roadways within the World Logistics Center. Details of these facilities will be established with subdivision and site development approvals. All street improvement plans will include these bikeways.

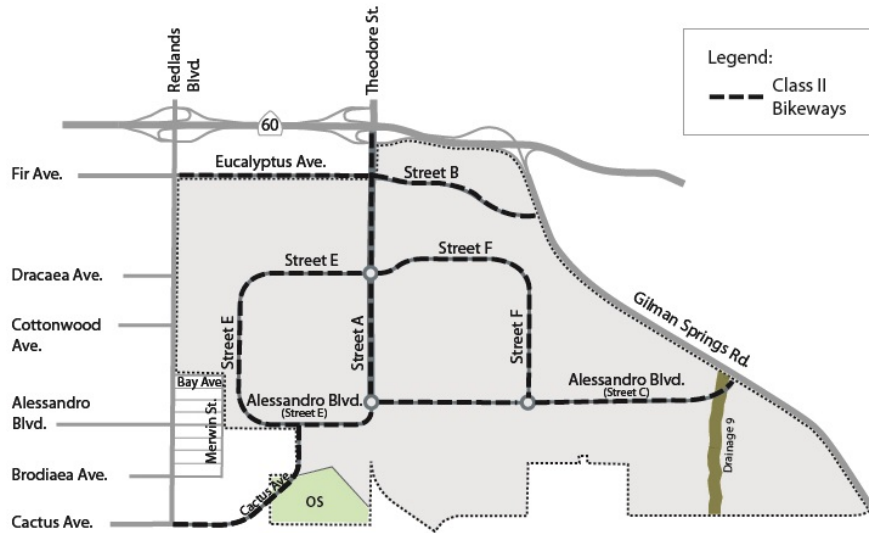


Exhibit 3-18 **Bicycle Circulation Plan**

3.5 Utilities

3.5.1 Water

Eastern Municipal Water District (EMWD) provides water service to the World Logistics Center, receiving its water from Metropolitan Water District (MWD) and local groundwater wells. The 2009 EMWD Water Facilities Master Plan (Master Plan) in conjunction with the Moreno Valley Water Pressure Zone Realignment Study (Realignment Study) evaluated the existing and future water needs and facilities required for the Moreno Valley Water System. The Master Plan and the Realignment Study analyzed the existing water system operating pressures and flows and recommended improvements to the system including realignment of the 1764 and 1900 pressures zones to 1764, 1860 and 1967 pressure zones. The area is currently served by existing pipelines in the 1764 and 1900 pressure zones that range in size from 8-inch to 21-inch diameter pipes.



The California Aqueduct/Metropolitan Water District (MWD) owns and operates a transmission line 145 inches in diameter, running north-south through the project area in Street A, and east-west in existing Eucalyptus Avenue, east of Street A.

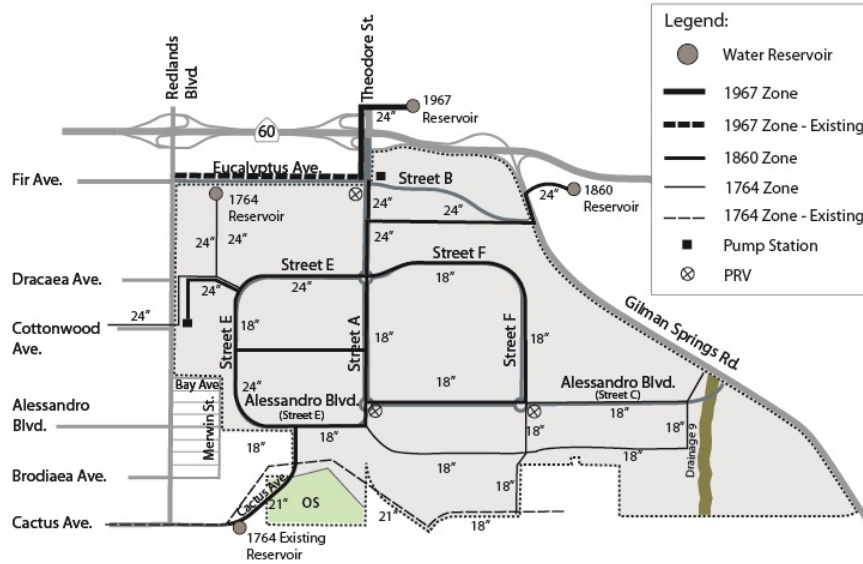


Exhibit 3-19 Water Facilities Master Plan

Development of the proposed project site will require three new water reservoirs to serve the respective water pressure zones (1967, 1860 and 1764). Two of the reservoirs are located outside of the Specific Plan boundary.

As development proceeds within the World Logistics Center, new waterlines, ranging in size from 12" to 24", will be constructed in the existing and proposed roadways to connect to future water tanks. The water system will require a new pump station. All water facilities will be constructed to EMWD standards and will be subject to a Plan of Service approval.





Minimize water infrastructure through native and drought tolerant landscapes

3.5.2 Sewer

Eastern Municipal Water District (EMWD) provides wastewater service to the World Logistics Center area. Wastewater generated from the World Logistics Center area will be treated at EMWD's Moreno Valley Regional Water Reclamation Facility (MVRWRF). The MVRWRF, located in the southwestern portion of the City near Kitching Street and Mariposa Avenue, has the capacity to treat 16 million gallons per day (MGD) of wastewater, which will accommodate the needs of the WLC project. The primary trunk sewer line serving the World Logistics Center area is located in Redlands Boulevard. This trunk sewer line continues in a southerly direction in Cactus Avenue, JFK Drive, Iris Avenue and Lasselle Streets conveying wastewater to the MVRWRF.

The proposed sewer in Street A (Theodore Street) and all lines to the west of Theodore Street form a gravity system and run generally southwest to a point of connection at Brodiaea Avenue and Redlands Boulevard. As demand requires, the existing segment of sewer in Brodiaea Avenue and Wilmot Street, west of Redlands Boulevard, will be upsized from a 15" to a 33" and 36" line respectively.



**INFRASTRUCTURE
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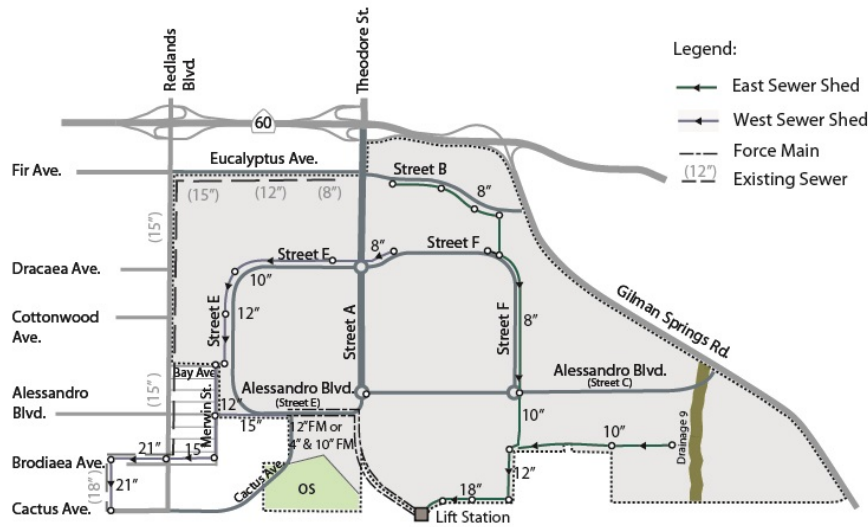


Exhibit 3-20 Wastewater Service Plan

The sewer system east of Street A (Theodore Street) will flow by gravity to a future sewer lift station at the southerly project boundary. From there, a force main will carry wastewater in a northwest direction, where it joins the gravity system west of Street A (Theodore Street) described above. Sewer lines will be located within public street rights-of-way to the greatest degree possible. Some of the buildings may require individual (private) lift stations due to building lengths, location of buildings, and phasing of improvements.

Future sewer lines will range in size between 8" and 24", and will be constructed to EMWD standards and will be subject to a Plan of Service approval.

3.5.3 Recycled Water

As stated in EMWD’s Water Supply Assessment for the World Logistics Center project, EMWD policy recognizes recycled water as the preferred source of supply for all non-potable water demands, including irrigation of recreation areas, greenbelts, open space common areas, commercial landscaping, and other water features. The proposed project is near an existing recycled water line and EMWD has indicated that in the future recycled water will be available for the project. No date has been established when recycled water will be available.



Recycled water will be used on the proposed project to the greatest extent practical. The availability, feasibility and reliability of recycled water use will be included in EMWD’s evaluation of the plan of service for the project.

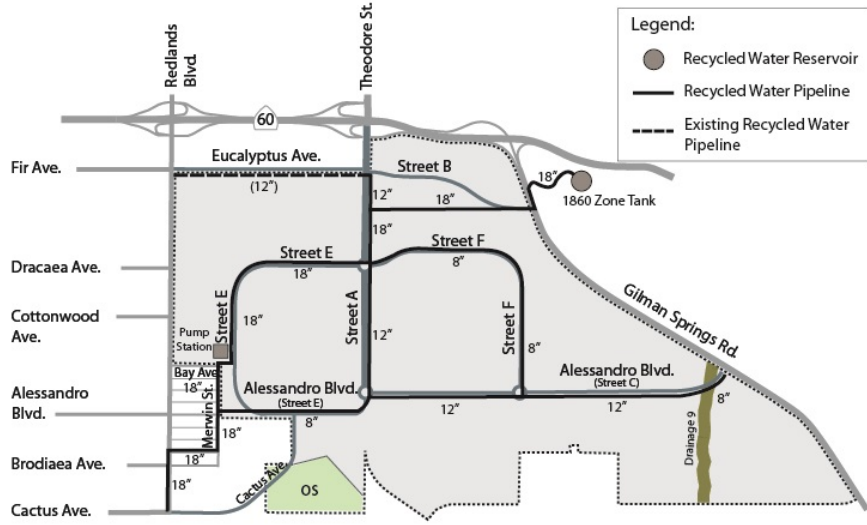


Exhibit 3-21 Recycled Water Plan

3.5.4 Storm Drain

The World Logistics Center Specific Plan area is within the San Jacinto River watershed which is part of the larger Santa Ana River watershed. The stormwater runoff from the project generally flows in a southerly direction to the San Jacinto River at an average gradient of 1 to 2 percent. A topographic divide located west of Street A (Theodore Street) separates stormwater flows to the San Jacinto River into two sub-areas. Runoff east of the divide flows to the San Jacinto Wildlife Area and the Gilman Hot Springs hydro-subarea. Runoff west of the divide is tributary to the Perris Valley Storm Drain and the Perris Valley hydro-subarea. Both hydro-subareas are tributary to the San Jacinto River, approximately 10 miles south of the project site.

The Riverside County Flood Control and Water Conservation District (RCFCWCD) is the responsible agency for the project area’s regional flood control system. The westerly portion of the project site is located within the Moreno Master Drainage Plan (MMDP). An existing 12-foot by 8-foot reinforced concrete box (RCB) owned by RCFCWCD is located east of Redlands Boulevard. This facility collects water passing under SR-60 and outlets south of Eucalyptus Avenue where it flows across agricultural land



downstream. Further south, the agricultural land drains to a RCFCWCD earthen channel at Redlands Boulevard which flows to a greenbelt channel located north of Cactus Avenue and east of Redlands Boulevard and ultimately drains to the Perris Valley Storm Drain.

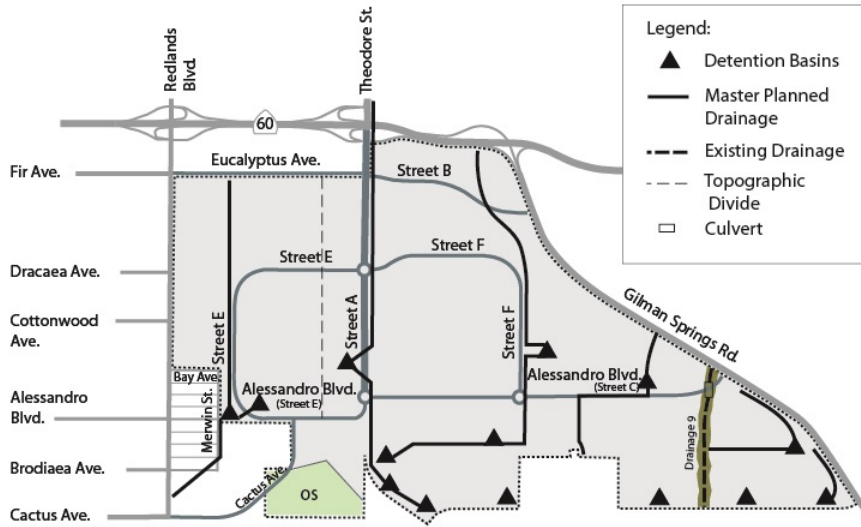


Exhibit 3-22 Storm Drain Plan

On the east side of the project site there is no master plan of drainage. The existing drainage facilities consist of open ditches along Theodore Street that convey runoff from adjacent areas and lands northerly of SR-60. A series of existing drainage culverts cross Gilman Springs Road conveying the offsite runoff from the Badlands through the World Logistics Center site.

One of these drainages is identified as Drainage 9. Its primary purpose is to convey water from the northern side of Gilman Springs Road to the SJWA on the south. Improvements will be added to enhance its drainage function. Prior to approval of any subdivision or Plot Plan including or adjacent to Drainage 9, a concept plan for the entire drainage feature shall be submitted to and approved by the City. The concept plan shall include proposed grading, improvements, landscaping, drainage facilities, signage, vehicular/pedestrian access, and any other proposed improvements. Site-specific projects shall be consistent with this concept plan.



Based on the latest Flood Insurance Rate Map (FIRM) published by the Federal Emergency Management Agency (FEMA), the project site is not located within a 100-year floodplain.

A system of underground drainage lines and detention basins will convey the stormwater runoff and manage the increased flow due to the proposed development. At each stage of development, the peak flows at downstream discharge points at the southerly project boundary will not exceed the peak flows for the existing condition.

Along the boundary of the San Jacinto Wildlife Area, concentrated flows released from detention basins will be spread to mimic existing sheet flow patterns.

3.5.5 Utility Conditions

Existing Electrical Service

Moreno Valley Utility (MVU) is the electricity provider for the World Logistics Center. MVU has an existing underground electrical service at the intersection of Dracaea Avenue and Redlands Boulevard. An electrical substation is located west of the project area at the southwest corner of Moreno Beach Drive and Cottonwood Avenue. The substation has a current capacity to distribute 56 Megawatts (MW) of power (28MW primary facility and 28MW backup system). The substation was designed for future expansion to an ultimate capacity of 112 MW. The current peak load for this substation is 22 to 26 MW. There is currently a 4.5 MW surplus capacity available.

SCE has existing 12 kV and 115 kV overhead power lines throughout the project area. The 115 kV power lines are located along Gilman Springs Road, Street B east of Street A, Street A north of Eucalyptus Avenue and along Brodiaea Avenue/Davis Road to the south. The 12 kV power lines are located along Gilman Springs Road, Theodore Street, Alessandro Boulevard, Eucalyptus Avenue east of Theodore Street and Redlands Boulevard.

Proposed Electrical Service

Based on electrical demands provided by MVU and data from other warehouse/distribution projects, the World Logistics Center has an



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estimated peak electrical demand of 68 MW. As development proceeds, the existing electrical substation located at the southwest corner of Moreno Beach Drive and Cottonwood Avenue will be expanded to its planned 112 MW capacity. A new substation will be built within the World Logistics Center area to meet the project's electrical demand at build-out. All MVU primary distribution conductors within the project will be installed in underground conduit and vaults in the public street right-of-way or easements as a joint trench with telephone, cable TV and natural gas.

Any SCE overhead power pole lines, less than 115kV, that need to be relocated to develop the project will be placed in underground conduits and vaults. SCE facilities 115kV or greater will remain as overhead lines.

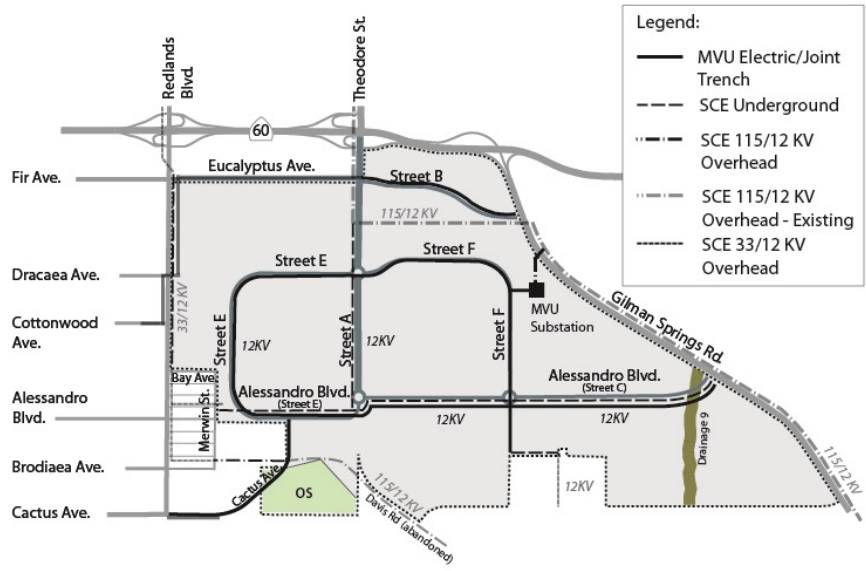


Exhibit 3-23 Electrical Utility Plan

Existing Natural Gas

Southern California Gas Company (SCGC) is the natural gas provider for the World Logistics Center. A 4" medium pressure service line runs in Redlands Boulevard. Low pressure facilities serve the residential area located west of Redlands Boulevard and southwest of Merwin Street and Bay Avenue.

Throughout the World Logistics Center, natural gas is transmitted through SDG&E underground pipelines serving the Southern California region that range in size from 16 inches to 36 inches. Two 30" diameter transmission pipelines that run in an east-west direction are located north and south of



Alessandro Boulevard. Three transmission pipelines, 16", 24" and 36" diameters run in a north-south direction along Virginia Street, south of Alessandro Boulevard. The 36" diameter line also extends east from Virginia Street parallel with the 30" line that runs south of Alessandro Boulevard.

SCGC transmission facilities within the World Logistics Center include a gas line blow-down facility and flow metering station at Alessandro Boulevard and Virginia Street.

Further south on Virginia Street, San Diego Gas & Electric (SDG&E) operates a natural gas compression station, known as the Moreno Compressor Station. It supplies gas to San Diego via 16", 30" and 36" transmission pipelines.

Questar has a 16" natural gas transmission line that runs in Alessandro Boulevard from Gilman Springs Road to Theodore Street, where it turns south to Maltby Avenue, and then turns west to Redlands Boulevard.



San Diego Gas & Electric Natural Gas Compression Station

Proposed Natural Gas Service

SCGC has indicated the 4" medium pressure service line that runs in Redlands Boulevard will be extended into the World Logistics Center to service the development. Gas service will be installed in the public street right-of-way or easements as a joint trench with telephone, cable TV and electrical services.



In connection with the development of the property, relocation of some natural gas transmission lines into public street right-of-way or easements will be necessary. SDG&E's Moreno Compressor Station will remain in place.

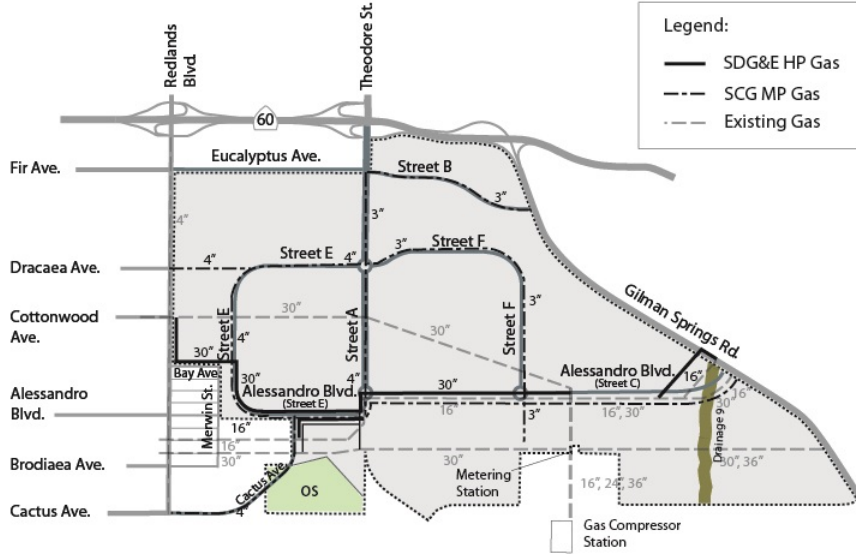


Exhibit 3-24 Gas Utility Plan

Existing Cable and Telecommunications

Telecommunications

Verizon provides telephone services to the World Logistics Center area. Underground telephone facilities are located throughout the project area and run along Alessandro Boulevard and Theodore Street. Four existing telecommunication cabinets are located northeast of the intersection of Alessandro Boulevard and Virginia Street. Overhead telecommunication lines run along Redlands Boulevard. Facilities for telephone service will be provided in every public street.

Cable Television

Time Warner Cable currently provides cable television to the World Logistics Center and vicinity. Existing overhead cable television facilities serve the residential area located west of Redlands Boulevard and southwest of Merwin Street and Bay Avenue. Within the World Logistics Center underground cable television facilities run along Alessandro Boulevard from Merwin Street to Theodore Street and overhead on Theodore Street to



Eucalyptus Avenue. Facilities for cable will be made available to all providers.

Proposed Cable and Telecommunications

As development proceeds, cable and telecommunications facilities located west of Redlands Boulevard will be extended to serve the World Logistics Center project. These facilities will be underground and may be provided by a number of service franchises.



Telecommunication infrastructure is a vital component in supporting global connectivity.



4.0 OFF-SITE DESIGN STANDARDS

These standards shall apply to those portions of the WLC property that are not within development sites. This includes common areas, open space, public areas, streetscapes, etc.

4.1 Off-site Architecture



4.1.1 Objectives

Off-site architecture includes buildings that house infrastructure or public use facilities that serve the WLC. Architectural design should express the character of a corporate logistic center in a manner that is progressive and enduring. In order to establish a clear, unified image throughout the World Logistics Center, these structures shall follow the guidelines set forth in Section 5.0 of this Specific Plan. These support buildings shall be designed in an understated and supporting fashion for the World Logistics Center.

4.1.2 Ground-mounted Equipment

All exterior ground-mounted equipment including, but not limited to, mechanical equipment, electrical equipment, emergency generators, boilers, storage tanks, risers, electrical conduit, gas lines, cellular telephone facilities, and satellite dishes shall be screened from public view from adjacent streets. Wall-mounted equipment is not allowed.

4.1.3 Roof-mounted Equipment

All roof-mounted equipment including, but not limited to, mechanical equipment, electrical equipment, storage tanks, cellular telephone

OFF-SITE DESIGN
STANDARDS

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facilities, satellite dishes, skylights, vents, exhaust fans, smoke hatches, and ducts must be below the top of the parapet or equipment screen. Roof access shall be through roof hatches, not exterior ladders. Roof hatches shall be located so that guardrails at parapets are not required.

4.2 Off-site Landscaping

4.2.1 Objectives

Landscaping is an important element contributing to the identity and unity of the World Logistics Center. As such, all landscaping for the project shall:

- Promote a pleasant, distinctive corporate environment,
- Augment internal cohesion and continuity within the World Logistics Center,
- Enhance the structured design concept of the World Logistics Center, and
- Promote water conservation.

The landscaping design concept is focused toward:

- Providing a clean, contemporary visual appearance,
- Coordinating the landscaping treatment along freeway, and surface streets to compliment the circulation system,
- Coordinating streetscapes within the World Logistics Center to unify its general appearance,
- Ensuring off-site landscaping design continuity among individual development sites within the World Logistics Center, and
- Minimizing long term maintenance.

The following guidelines present parameters for general landscape design, water conservation, and streetscapes. On-site landscaping guidelines are addressed in Section 5.4 of this Specific Plan.

4.2.2 Water Conservation Measures

The World Logistics Center employs an aggressive approach to water conservation. Every element of the landscape program has been evaluated to determine how to achieve the project's landscape goals while consuming as little water as possible. From the formulation of the overall landscape concept, through each level of the design process, to the day-to-day maintenance practices of the installed materials, conservation of limited water resources is a constant primary focus.

This approach represents a significant departure from conventional development strategies, particularly in a large-scale master-planned



logistics campus setting. Most of the project will be designed without mechanical irrigation, relying instead on maximizing the collection and harvesting of runoff to be directed to landscape areas. This program will require the use of carefully selected plant types, complex drainage designs, intricate planting techniques, and specialized maintenance programs.

Implementation of these new design concepts will result in a landscape aesthetic that will appear different than traditional landscape treatments. At installation, plant material will be smaller and with greater spacing in order to match available water to the needs of specific plants. As landscaping gets established, coverage may take longer, certain plants will appear dry as they go through dormant periods, and in some cases supplemental watering may be necessary in periods of severe drought. At maturity, the landscaping at the WLC project will provide a strong, clean, simple design element, demonstrating the WLC's commitment to the creation of a successful logistics campus in a sustainable environment.

The landscape program will incorporate the following design elements and practices to minimize the use of limited water resources:

Project Design:

- Design project so that pads, streets and other paved areas drain to landscape areas, medians and parkways,
- Maximize water harvesting, retention and treatment techniques throughout the project
- Utilize zero-inch curb design to facilitate rainwater runoff from road surfaces
- Direct rooftop and parking area runoff to bioswales, basins or landscaped areas

Landscape Design:

- Develop watershed areas for the project areas in order to manage water harvesting and distribution
- Calculate estimated runoff from roofs and paved areas to manage water harvesting and retention practices
- Conduct site-specific analyses of seasonal weather patterns, rain patterns, soils and drainage, grades and slopes, macro and micro climates, solar exposure, prevailing wind conditions, historical evapotranspiration rates and weather station (CIMIS) data
- Design to meet peak moisture demand of all plant materials within design zones and avoid flow rates that exceed infiltration rate of soil
- Maximize the use of drought tolerant plant species



**OFF-SITE DESIGN
STANDARDS**

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- Select plant palettes tolerant of periodic inundation from storm water runoff
- Calculate optimum spacing of plants to avoid overcrowding and need for excessive irrigation.
- Select container plant sizes are to achieve a high root to canopy ratio; no root bound or oversized plants

Construction:

- Grade all planting areas to control high intensity rainfall and runoff episodes. Provide riprap at downspouts; create multiple watersheds to disperse water flow. Use surface mulch and straw wattles.
- Grade all planting areas to provide for the retention and infiltration of water to each plant.
- Provide soil amendment to plant pits based upon soil laboratory test results and landscape species.
- Construct planting pits to be 3-4 times the diameter of the planting container and twice as deep.
- Provide a pre-hydration program prior to planting installation to reflect climate and soil conditions.
- Cover all planting areas with a combination of organic and inorganic mulches to be used along with pre-emergent herbicide treatment to control weed growth and soil erosion.
- Install soil moisture sensors in strategic planting zones.
- Require certification that the irrigation system was installed and operates as designed, and conduct a post-installation audit of actual water consumption
- Provide for supplemental irrigation on an as-needed basis, such as supply lines and valves, quick-connect couplers or water truck service.

Maintenance:

- Establish maintenance guidelines to specify actions to replace dead plants, replenish surface mulch, and remove trash and weeds.
- Regularly monitor all landscaped areas and make adjustments as necessary to assure the health of planted materials and progress toward meeting the project's landscape goals.

Where irrigation is provided:

- Use planting zones coordinated according to plant type, climatic exposure, soil condition and slope to facilitate use of zoned irrigation systems Use reclaimed water systems if available and practical,
- Use best available irrigation technology to maximize efficient use of water, including moisture sensors, multi-program electronic timers, rain shutoff devices, remote control valves, drip systems, backflow



OFF-SITE DESIGN
STANDARDS

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preventers, pressure reducing valves and precipitation-rated sprinkler heads,

- Use gate valves to isolate and shut down mainline breaks,
- Use wind shut-off sensors for the irrigation controllers,
- Design irrigation systems to prevent discharge onto non-landscaped areas or adjacent properties,
- Restrict irrigation cycles to operate at night when wind, evaporation and activity are at a minimum

Coverage:

- At installation, plant size, density and spacing shall be as specified in approved landscape plans at 15% coverage.
- Based on these design guidelines and average annual rainfall, irrigated and non-irrigated planting groups shall achieve 70% coverage after three years. Until plant material achieves full coverage, a minimum of 3" of mulch will be maintained throughout planted area, and any growth (e.g. weeds) not included in the Specific Plan plant palette shall be removed twice per year (March and September).

All landscape plans shall be reviewed by Eastern Municipal Water District and the City of Moreno Valley.

4.2.3 Streetscapes

Landscaping along public streets is designed to provide a unified appearance along street frontages, to reinforce the street hierarchy, and to establish identities of place, particularly at intersections within the World Logistics Center.

4.2.3.1 General Design Criteria

All landscape design and maintenance within the World Logistics Center shall comply with the Landscape and Water Efficiency Requirements contained in the Municipal Code or these guidelines, whichever imposes a higher design or performance standard.

1. Trees are required along all street frontages according to the criteria for streetscapes given in the following sections.
2. All street trees are to be 24" box within street right of way, unless otherwise noted. Trees in other areas shall be 15 gallon minimum in size but 25% shall be minimum 24" box.
3. Landscaping berms along street frontages may be utilized. Maximum slopes may not exceed 2:1. City maintained areas shall not exceed 3:1.



OFF-SITE DESIGN
STANDARDS

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- 4. Shrubs along street frontages are to be utilized where possible.
(Minimum size at installation is 1 gallon. Minimum size at installation for grasses is 1 gallon.)

4.2.4 Special Edge Treatment Areas Design Criteria

There are four discrete edge treatment plans in and around the project. The areas are indicated below:

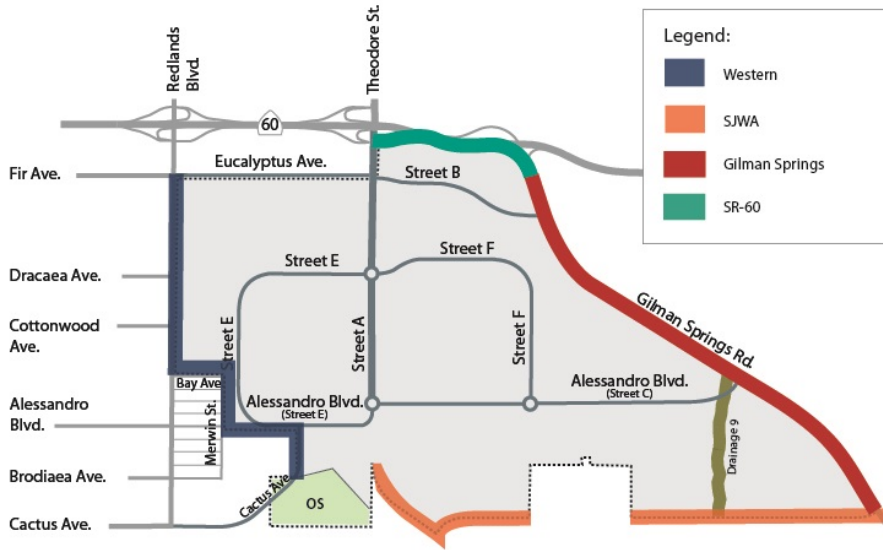


Exhibit 4-1 Special Edge Treatment Areas Design Criteria

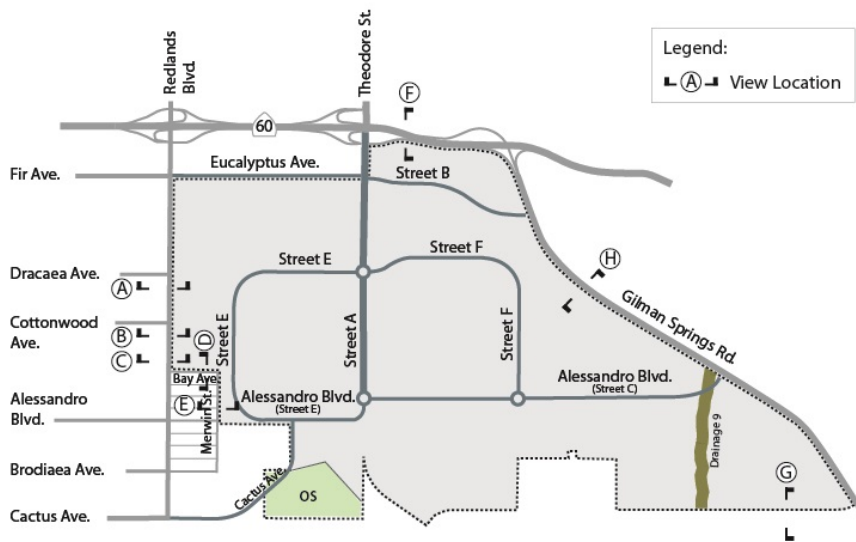


Exhibit 4-2 Edge Exhibit Map (Key map for following exhibits)



OFF-SITE DESIGN STANDARDS

4.2.4.1 Western Edge

When viewed from the sidewalk on the western side of Redlands and Merwin and the southern side of Bay, all but 15 feet of future buildings shall be screened by walls, berms, and/or landscaping.

Redlands Boulevard

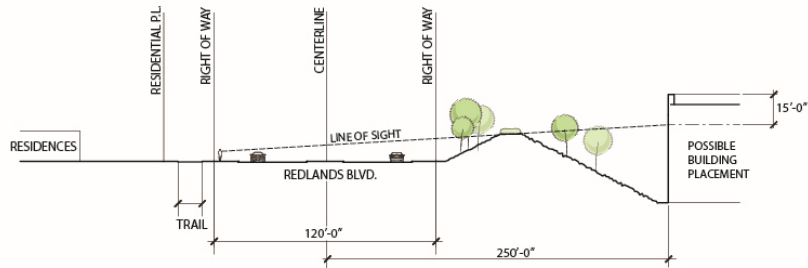


Exhibit 4-3 Redlands Blvd. Section A

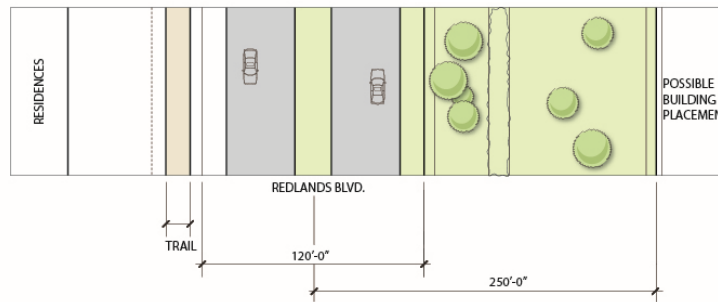


Exhibit 4-4 Redlands Blvd. Plan View A

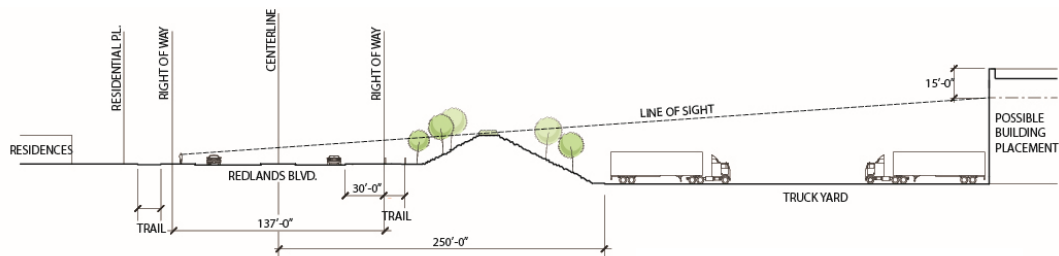


Exhibit 4-5 Redlands Blvd. Section B

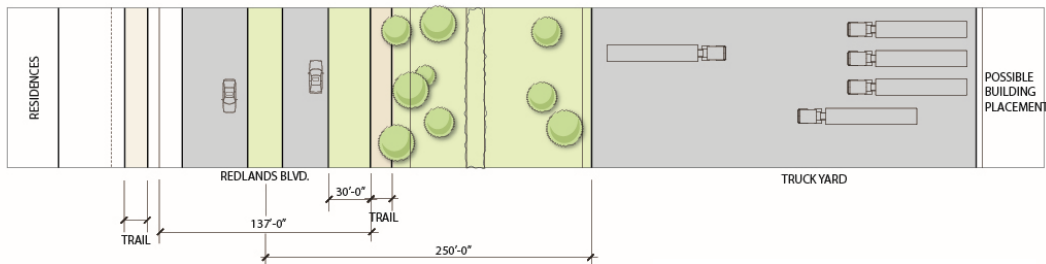


Exhibit 4-6 Redlands Blvd. Plan View B

These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.



OFF-SITE DESIGN STANDARDS

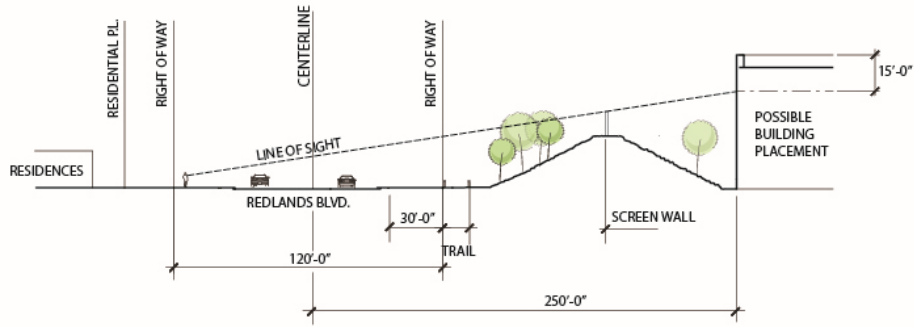


Exhibit 4-7 Redlands Blvd. Section C

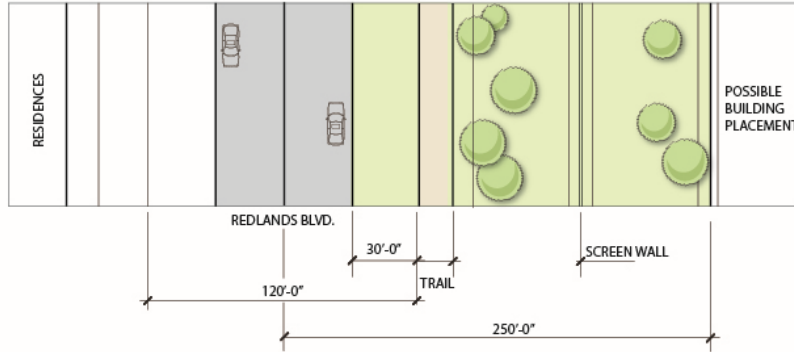


Exhibit 4-8 Redlands Blvd. Plan View C

Bay Avenue

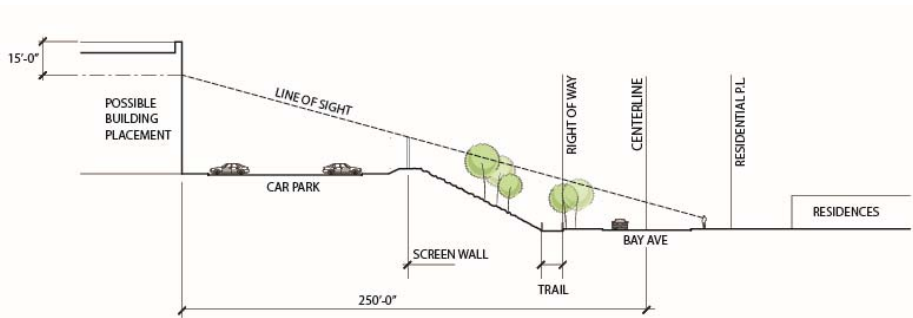


Exhibit 4-9 Bay Ave. Section D

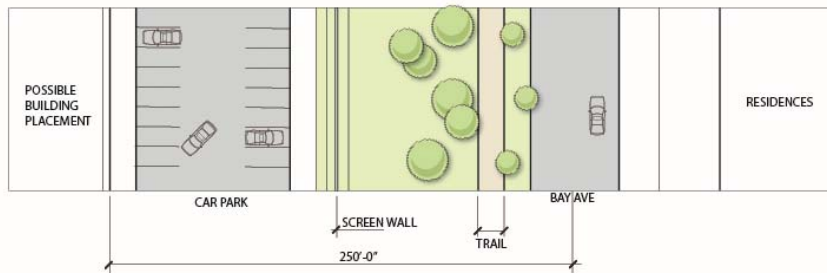


Exhibit 4-10 Bay Ave. Plan View D

These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.



OFF-SITE DESIGN STANDARDS

Merwin Street

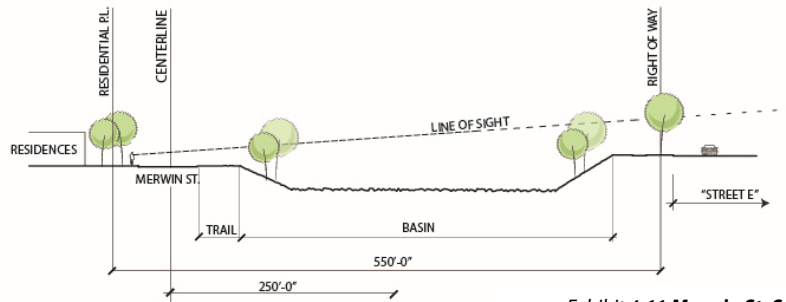


Exhibit 4-11 Merwin St. Section E

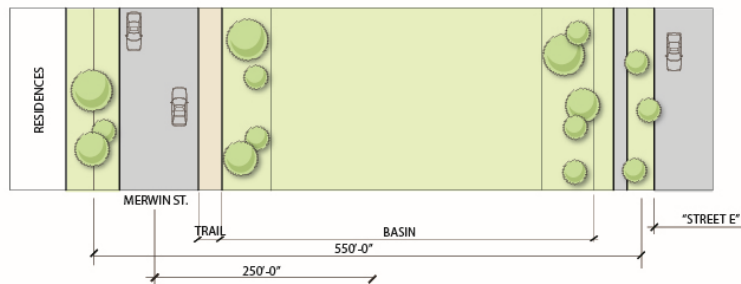


Exhibit 4-12 Merwin St. Plan View E

4.2.4.2 SR-60 Edge

SR-60 screening criteria is to screen buildings and trucking areas in a similar manner as the area south of SR60 between Redlands Blvd. and Theodore Street (Highland Fairview Corporate Park).

SR-60 between Theodore and Gilman Springs Road

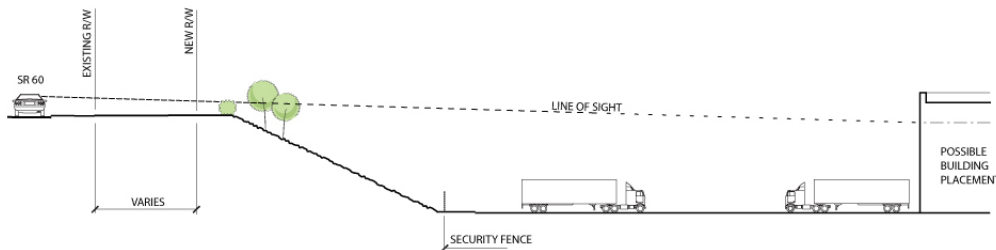


Exhibit 4-13 SR-60 Section F

These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.



OFF-SITE DESIGN STANDARDS

4.2.4.3 SJWA Edge

When viewed from the southerly property line, all trucks and truck dock doors are to be screened by walls and/or landscaping.

SJWA

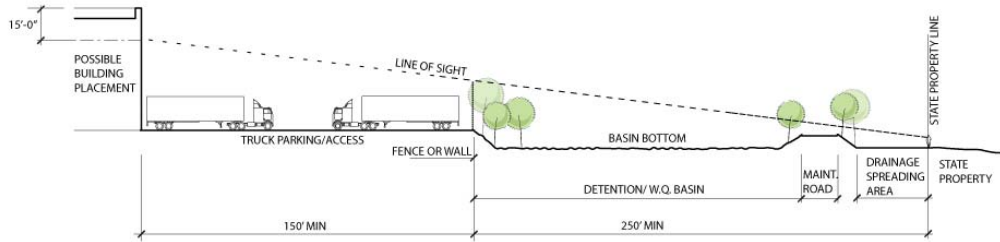


Exhibit 4-14 SJWA Section G

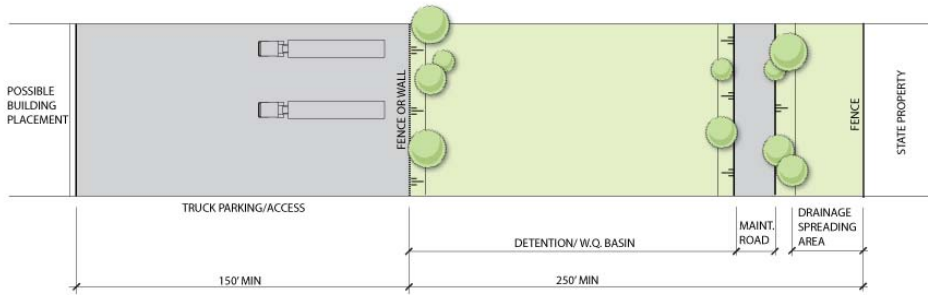


Exhibit 4-15 SJWA Plan View G

These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.



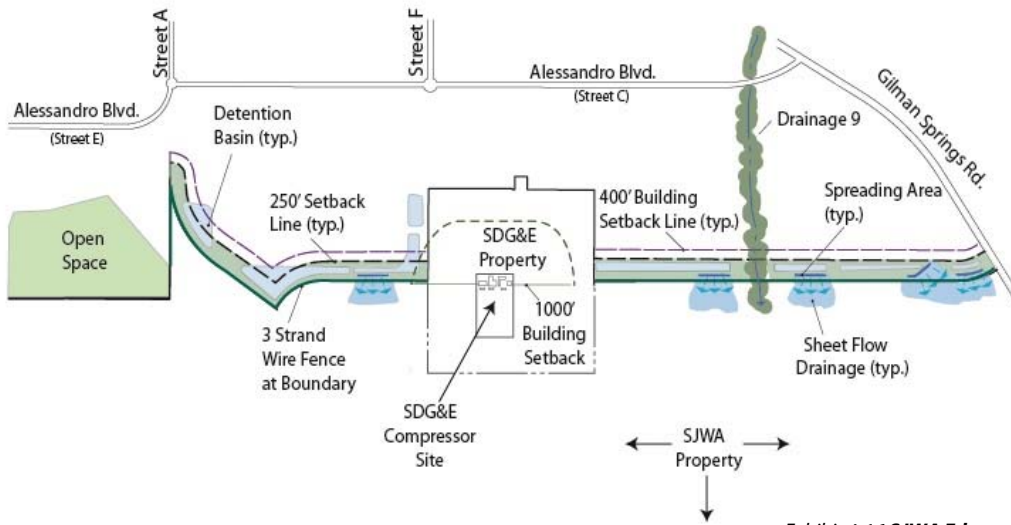


Exhibit 4-16 SJWA Edge

This is a graphic representation of the potential development of property along the project's southerly property line, adjacent to the San Jacinto Wildlife Area (SJWA). The location, configuration, and size of improvements shown are conceptual and will be refined in connection with detailed engineering plans as the project proceeds.

See Section 2.6 of the Specific Plan regarding requirements for the review and approval of a concept plan for the SJWA Edge Treatment Area.



SJWA- View Simulation from SJWA Visitor's Center



OFF-SITE DESIGN STANDARDS

4.2.4.4 Gilman Springs Road Edge

A combination of landscaping, walls, and fences will serve to screen the view from Gilman Springs Road.

Gilman Springs Road

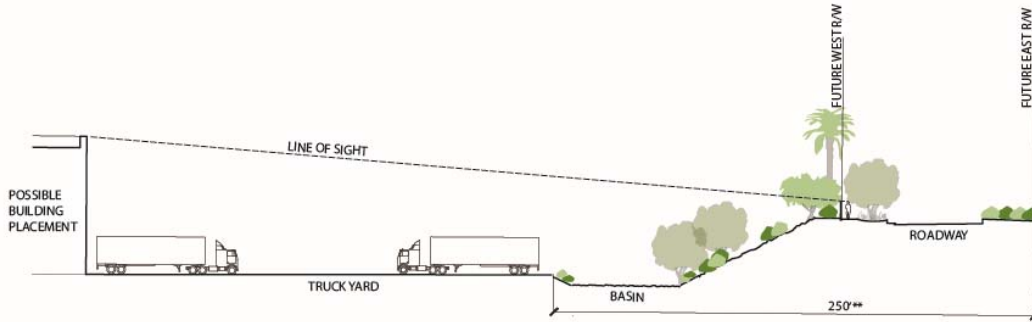


Exhibit 4-17 Gilman Springs Road Section, Downhill



Exhibit 4-18 Gilman Springs Road Section, Uphill

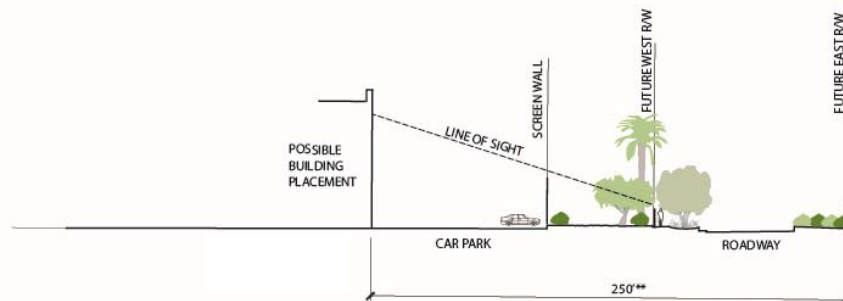


Exhibit 4-19 Gilman Springs Road Section, Flat

**Required setback to truck activity areas. A shorter setback is permitted subject to air quality and noise analyses.

These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.



OFF-SITE DESIGN STANDARDS

4.2.5 Screening Criteria for All Interior Roadways

From the adjacent sidewalk, all trucks and truck dock doors are to be screened by walls and/or landscaping.

All Interior Roadways

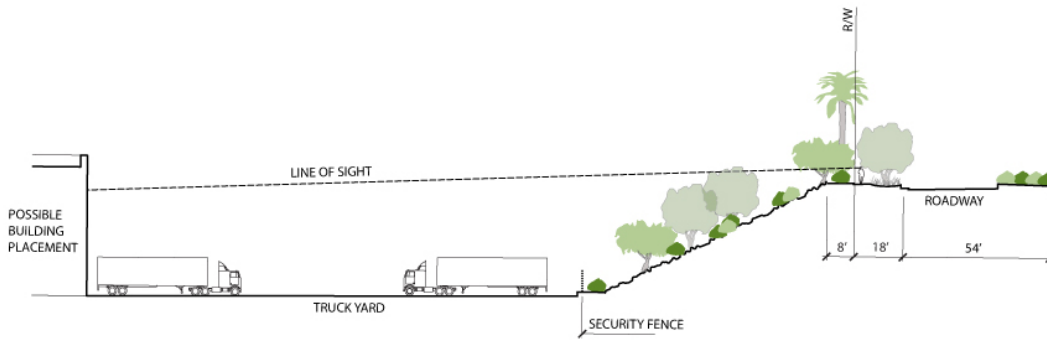


Exhibit 4-20 Section, Downhill

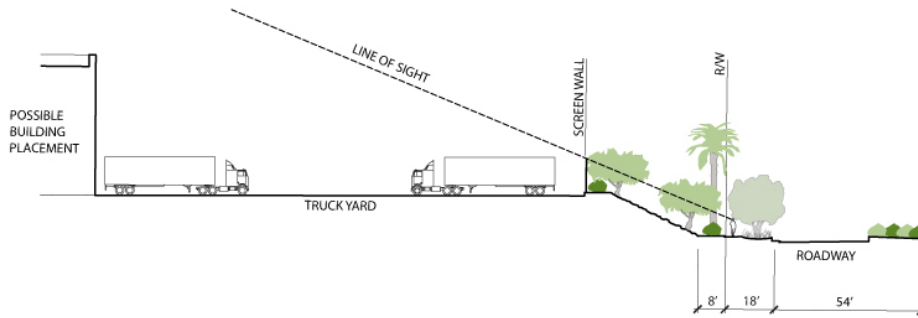


Exhibit 4-21 Section, Uphill

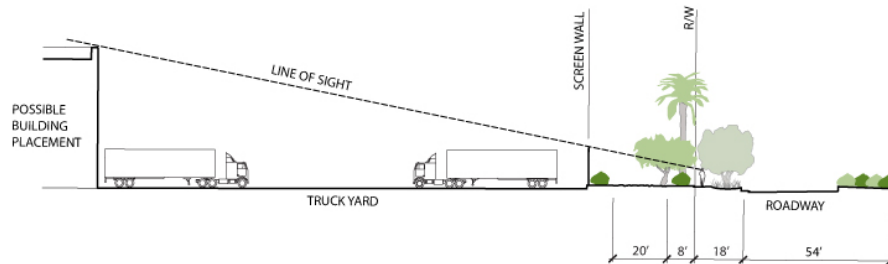


Exhibit 4-22 Section, Flat

These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.



OFF-SITE DESIGN STANDARDS

4.2.6 Perimeter Planting

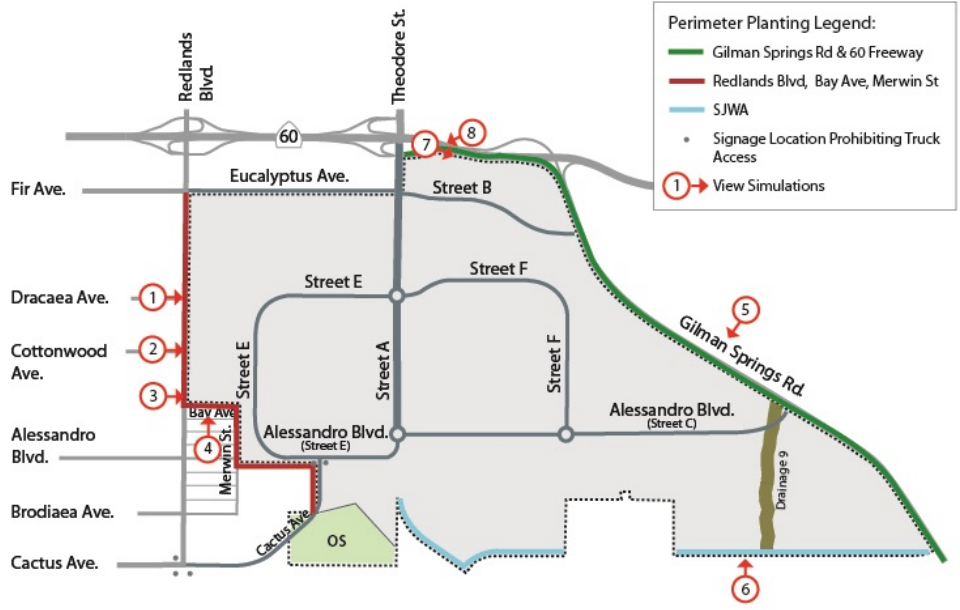
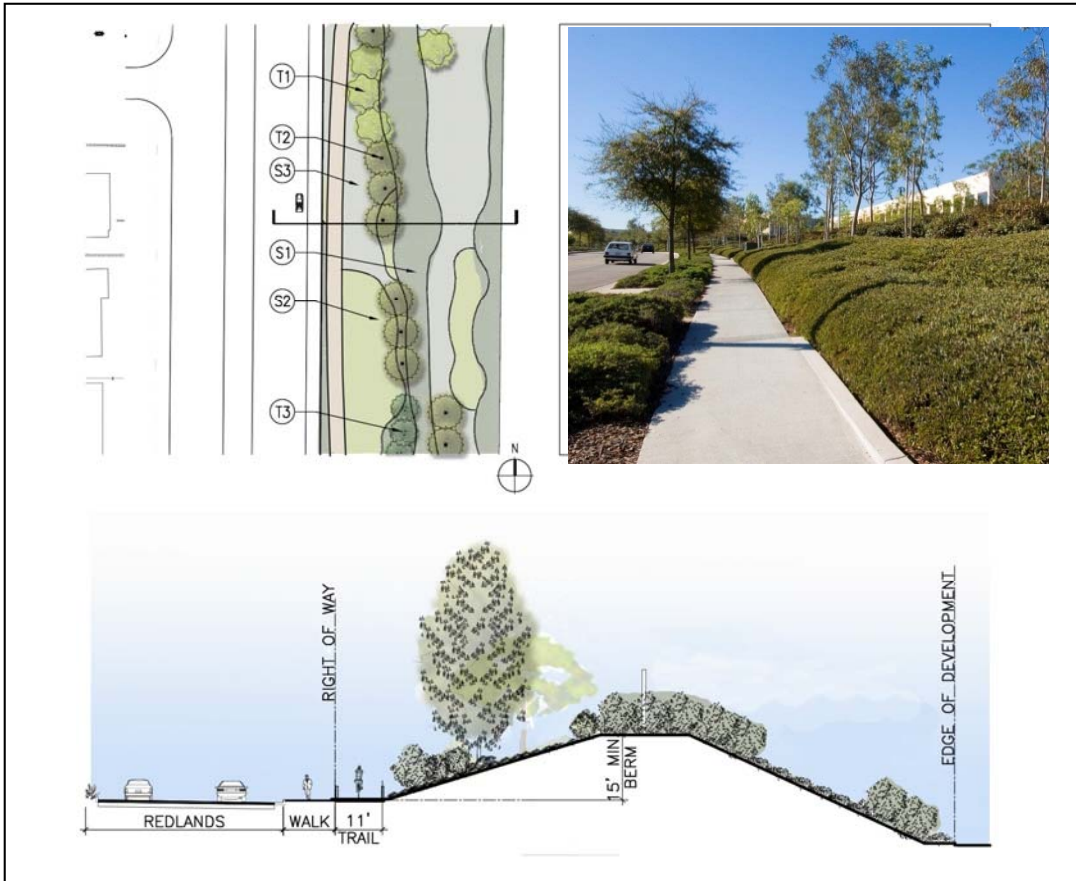


Exhibit 4-23 Perimeter Planting Map (see pages 4-15 to 4-29)



OFF-SITE DESIGN STANDARDS

Redlands Boulevard



Not to scale | This exhibit is a graphic representation of a conceptual design at maturity

Trees (24" box minimum)

- T1. Cercidium 'Desert Museum': Desert Museum Palo Verde
- T2. Pinus eldarica: Afghan Pine or Pinus halepensis: Aleppo Pine or Schinus molle: California Pepper
- T3. Acacia farnesiana: Sweet Acacia

Shrubs / Ground Cover (1 gallon minimum)

- S1. Leucophyllum texanum: Texas Ranger
 Eleagnus pungens 'Fruitlandii': Fruitland Silverberry
- S2. Fallugia paradoxa: Apache Plume
 Justicia californica: Chuparosa
 Senna phyllodinea: Silver Cassia
 Simmondsia chinensis: Jojoba
 Baileya multiradiata: Desert Marigold
- S3. Acacia redolens 'Desert Carpet': Spreading Acacia
 Baccharis 'Starn': Coyote Bush
 Myoporum parvifolium 'Putah Creek': Creeping Myoporum
 Rosmarinus "Huntington Carpet": Rosemary



OFF-SITE DESIGN STANDARDS

4-15



Redlands Blvd. View 1 at Installation



Redlands Blvd. View 1 at Maturity

- These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.
- "Maturity" - 15 years estimated based on average rainfall and growing seasons.
- These renderings do not include street trees which will add to the screening effects.



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TM

OFF-SITE DESIGN STANDARDS



Redlands Blvd. View 2 at Installation



Redlands Blvd. View 2 at Maturity

- *These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.*
- *"Maturity" - 15 years estimated based on average rainfall and growing seasons.*
- *These renderings do not include street trees which will add to the screening effects.*



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OFF-SITE DESIGN STANDARDS

4-17



Redlands Blvd. View 3 at Installation



Redlands Blvd. View 3 at Maturity (15 years)

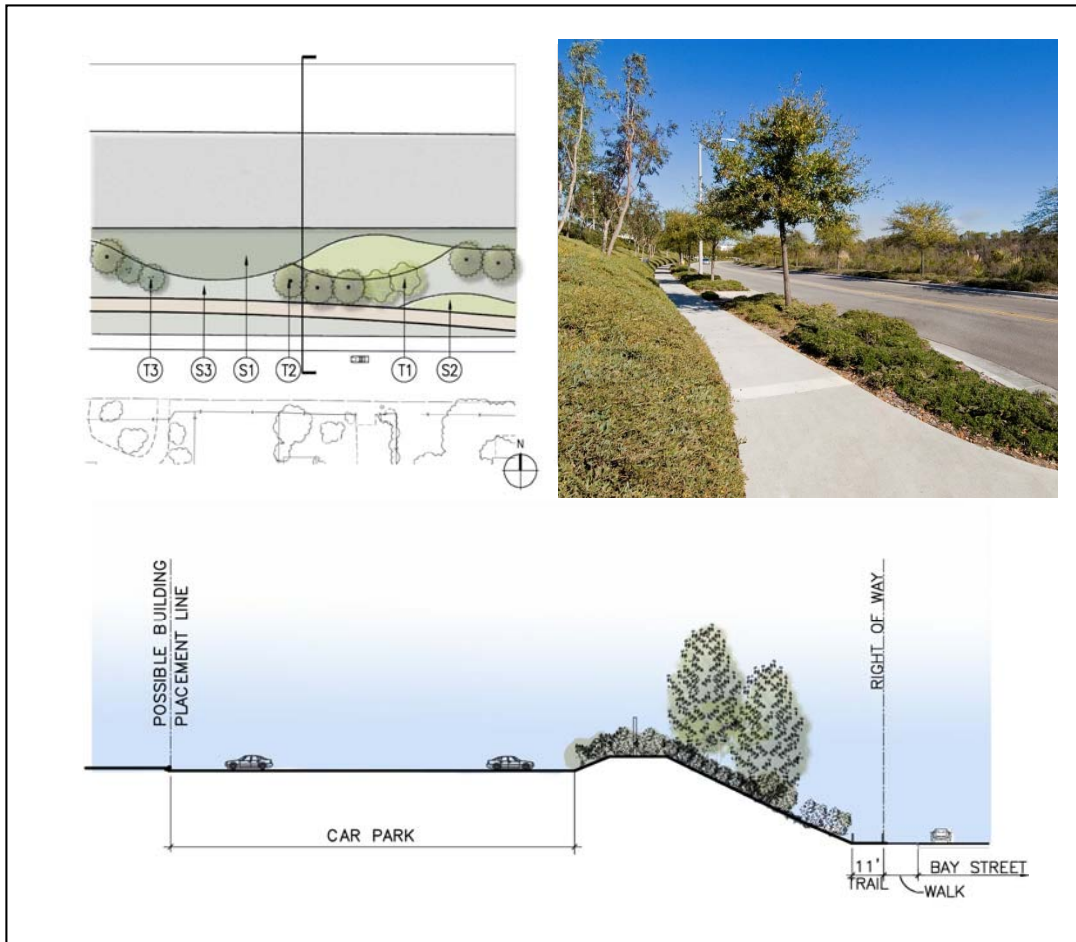
- These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.
- "Maturity" - 15 years estimated based on average rainfall and growing seasons.
- These renderings do not include street trees which will add to the screening effects.



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OFF-SITE DESIGN STANDARDS

Bay Avenue



Not to scale | This exhibit is a graphic representation of a conceptual design at maturity

Trees (15 gallon minimum)

- T1. Cercidium 'Desert Museum': Desert Museum Palo Verde
- T2. Pinus eldarica: Afghan Pine or Pinus halepensis: Aleppo Pine or Schinus molle: California Pepper
- T3. Acacia farnesiana: Sweet Acacia

Shrubs / Ground Cover (1 gallon minimum)

- S1. Leucophyllum texanum: Texas Ranger Elaeagnus
Elaeagnus pungens 'Fruitlandii': Fruitland Silverberry
- S2. Fallugia paradoxa: Apache Plume
Justicia californica: Chuparosa
Senna phyllodinea: Silver Cassia
Simmondsia chinensis: Jojoba
Baileya multiradiata: Desert Marigold
- S3. Acacia redolens 'Desert Carpet': Spreading Acacia
Baccharis 'Starn': Coyote Bush
Myoporum parvifolium 'Putah Creek': Creeping Myoporum



**OFF-SITE DESIGN
STANDARDS**

4-19



Bay Avenue View 4 at Installation



Bay Avenue View 4 at Maturity (15 years)

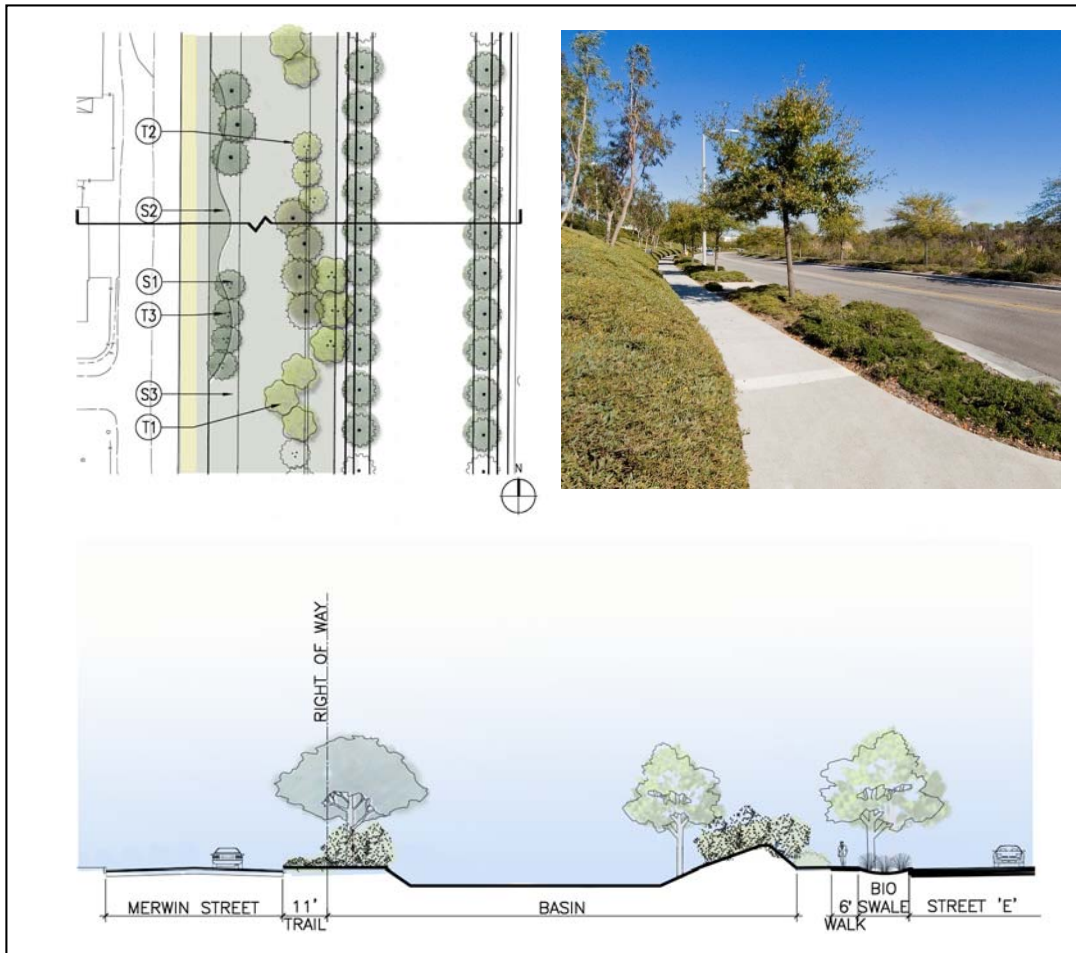
- These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.
- "Maturity" - 15 years estimated based on average rainfall and growing seasons.
- These renderings do not include street trees which will add to the screening effects.



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OFF-SITE DESIGN STANDARDS

Merwin Street



Not to scale | This exhibit is a graphic representation of a conceptual design at maturity

Trees (15 gallon minimum)

- T1. Cercidium 'Desert Museum': Desert Museum Palo Verde
- T2. Pinus eldarica: Afghan Pine or Schinus molle: California Pepper
- T3. Acacia farnesiana: Sweet Acacia

Shrubs / Ground Cover (1 gallon minimum)

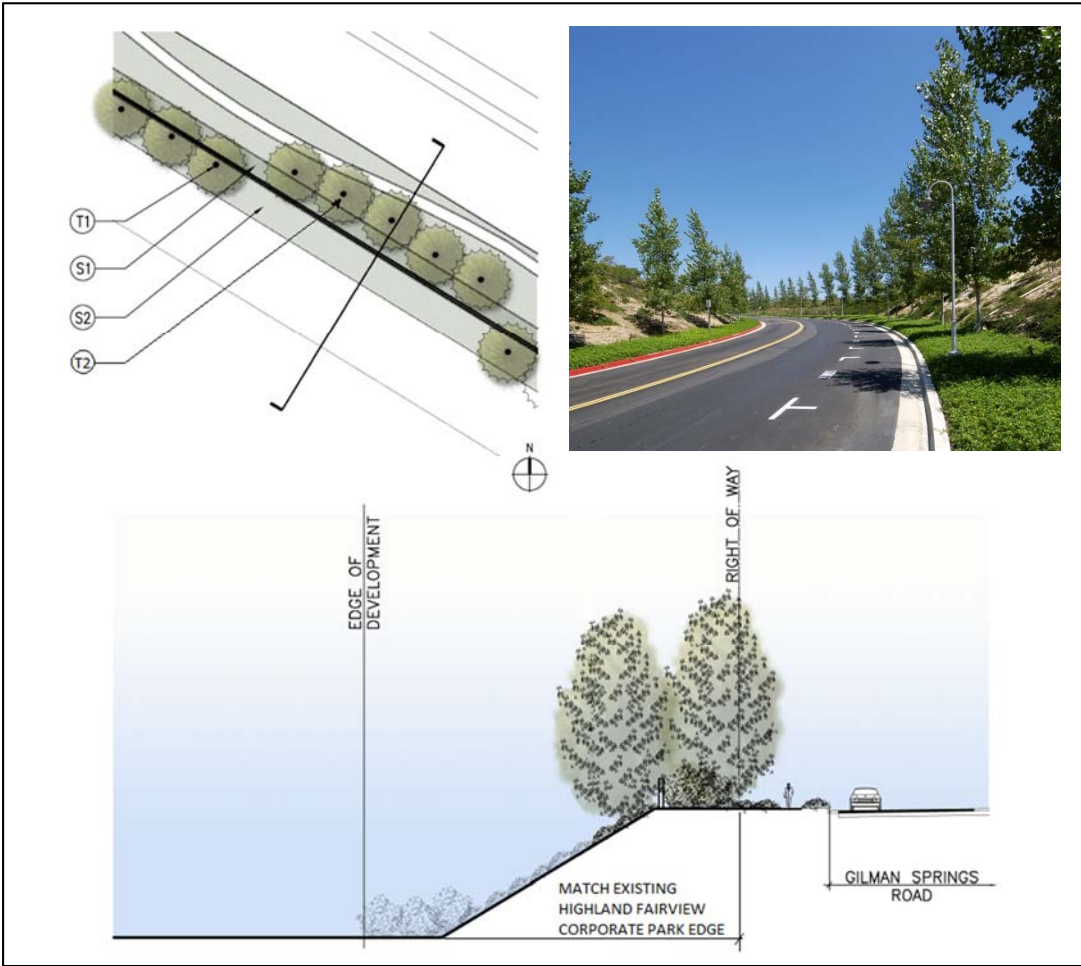
- S1. Leucophyllum texanum: Texas Ranger
Eleagnus pungens 'Fruitlandii': Fruitland Silverberry
- S2. Fallugia paradoxa: Apache Plume
Justicia californica: Chuparosa
Senna phyllodinea: Silver Cassia
Simmondsia chinensis: Jojoba
Baileya multiradiata: Desert Marigold
- S3. Acacia redolens 'Desert Carpet': Spreading Acacia
Baccharis 'Starn': Coyote Bush
Myoporum parvifolium 'Putah Creek': Creeping Myoporum
Rosmarinus "Huntington Carpet": Rosemary



OFF-SITE DESIGN STANDARDS

4-21

Gilman Springs Road



Not to scale | This exhibit is a graphic representation of a conceptual design at maturity

Trees (Palms – 25’ brown trunk height, all other trees – 24” box min. – all matching)

- T1. Pinus eldarica: Afghan Pine
- T2. Washington Robusta: Mexican Fan Palm

Shrubs / Ground Cover (1 gallon minimum)

- S1. Rhus ovata: Sugar Bush
- S2. Rosmarinus officinalis ‘Prostratus’: Creeping Rosemary



OFF-SITE DESIGN STANDARDS

Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL



Gilman Springs Rd. View 5 at Installation



Gilman Springs Rd. View 5 at Maturity (15 years)

- These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.
- "Maturity" - 15 years estimated based on average rainfall and growing seasons.
- These renderings do not include street trees which will add to the screening effects.



WORLD LOGISTICS CENTER®

OFF-SITE DESIGN STANDARDS

4-23

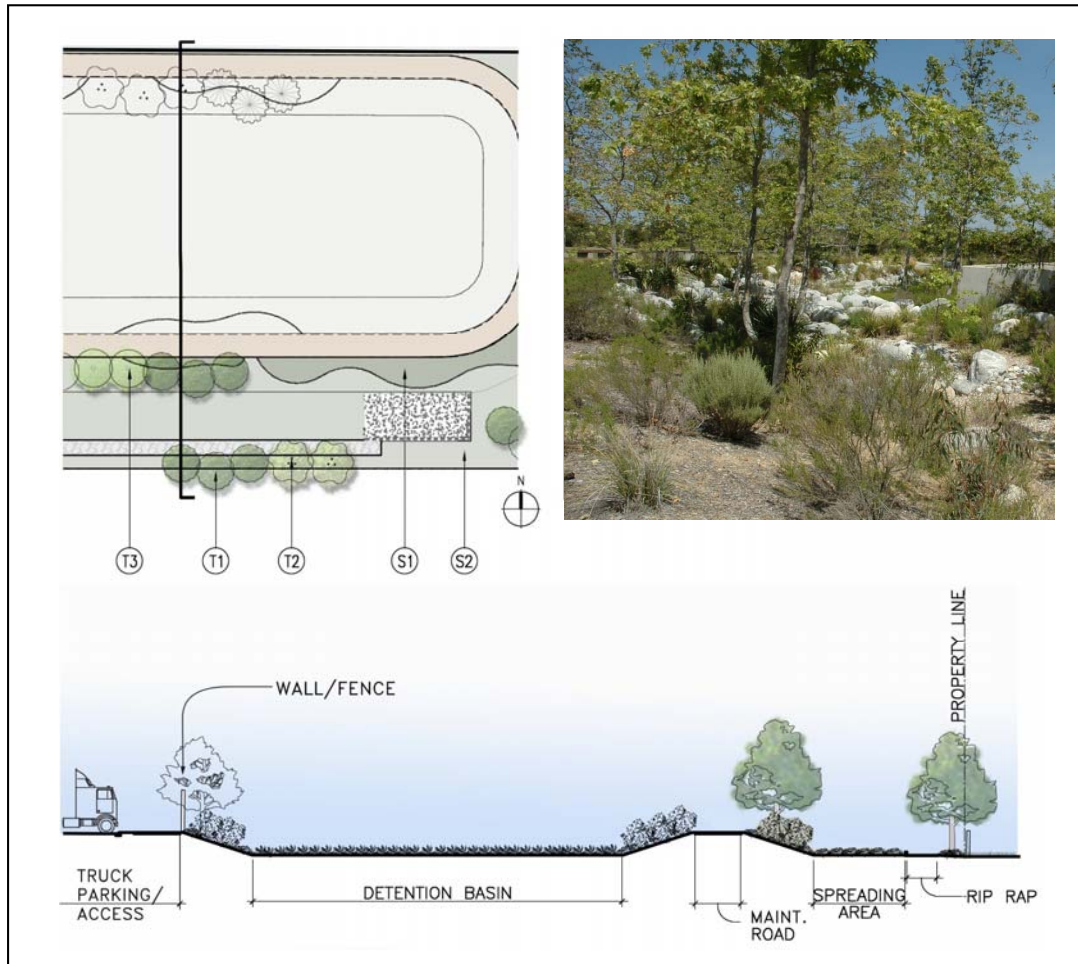


Gilman Springs Rd. Panoramic View at Maturity



OFF-SITE DESIGN STANDARDS

SJWA (San Jacinto Wildlife Area)



Not to scale | This exhibit is a graphic representation of a conceptual design at maturity

Trees (15 gallon minimum)

- T1. *Tristania conferta*: Brisbane box
- T2. *Chilopsis linearis*: Desert Willow
- T3. *Platanus racemosa*: California Sycamore
- Populus Fremontii*: Cottonwood (Planted at detention basins / Well adapted to riparian regions of Moreno Valley)

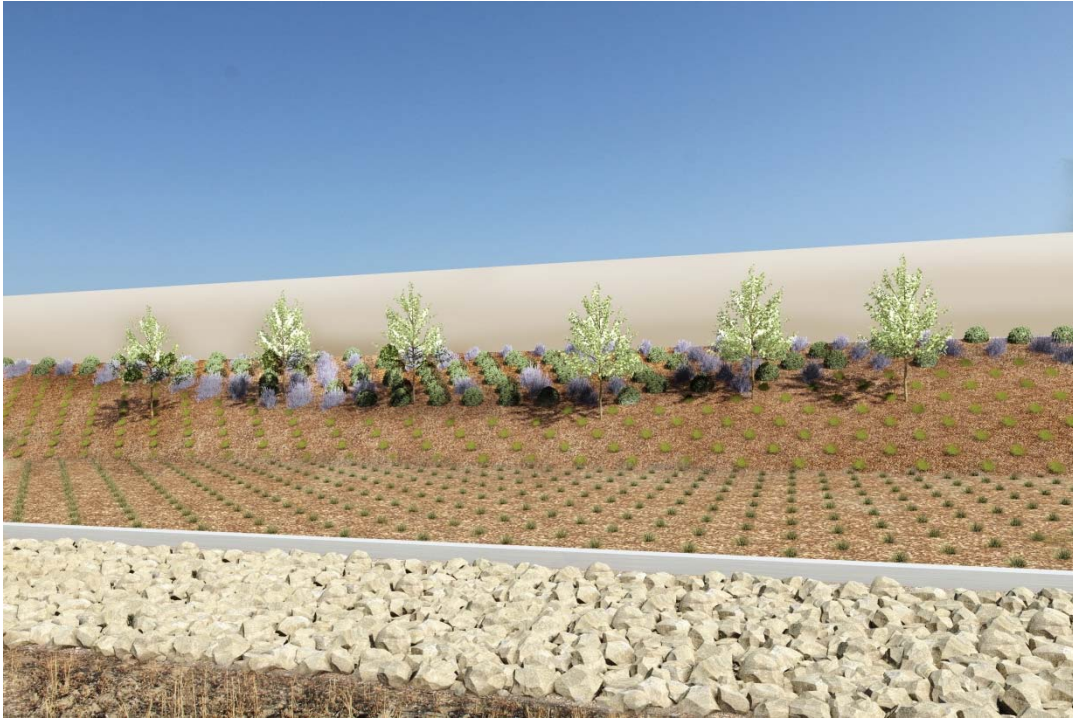
Shrubs / Ground Cover (1 gallon minimum)

- S1. *Baccharis sarathroides*: Desert Broom
- Leucophyllum texanum*: Texas Ranger
- Simmondsia chinensis*: Jojoba
- Lycium andersonii*: Anderson Thornbush
- Celtis pallida*: Desert Hackberry
- S2. *Rosmarinus officinalis* 'Prostratus': Creeping Rosemary



OFF-SITE DESIGN
STANDARDS

4-25



SJWA (San Jacinto Wildlife Area) View 6 at Installation



SJWA (San Jacinto Wildlife Area) View 6 at Maturity (15 years)

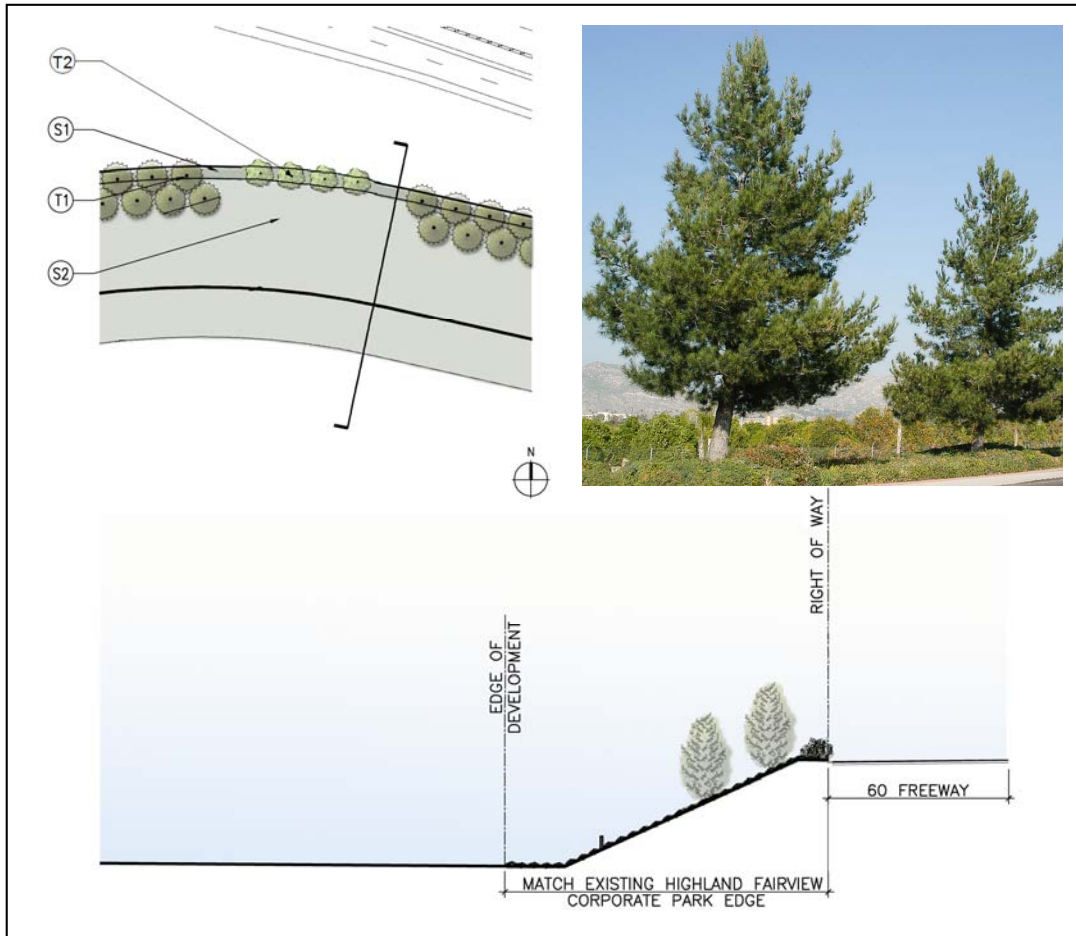
- *These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.*
- *"Maturity" - 15 years estimated based on average rainfall and growing seasons.*
- *These renderings do not include street trees which will add to the screening effects.*



OFF-SITE DESIGN STANDARDS

4-26

60 Freeway



Not to scale | This exhibit is a graphic representation of a conceptual design at maturity

Trees (Palms – 25' brown trunk height, all other trees – 36" box min. – all matching)

T1. Pinus eldarica: Afghan Pine

T2. Washington robusta: Mexican Fan Palm

Shrubs / Ground Cover (1 gallon minimum)

S1. Cotoneaster lacteus: Cotoneaster

S2. Acacia redolens 'Desert Carpet': Spreading Acacia
Rosmarinus "Huntington Carpet": Rosemary



OFF-SITE DESIGN
STANDARDS

4-27



60 Freeway View 7 at Installation



60 Freeway View 7 at Maturity (15 years)

- These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.
- "Maturity" - 15 years estimated based on average rainfall and growing seasons.
- These renderings do not include street trees which will add to the screening effects.



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OFF-SITE DESIGN STANDARDS

4-28

Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL



60 Freeway View 8 at Installation



60 Freeway View 8 at Maturity (15 years)

- *These sections depict varying screening techniques through use of walls, berms and/or landscaping. One or more of these techniques may be used to achieve required screening.*
- *"Maturity" - 15 years estimated based on average rainfall and growing seasons.*
- *These renderings do not include street trees which will add to the screening effects.*



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OFF-SITE DESIGN STANDARDS

4.2.7 Roundabout & Entry

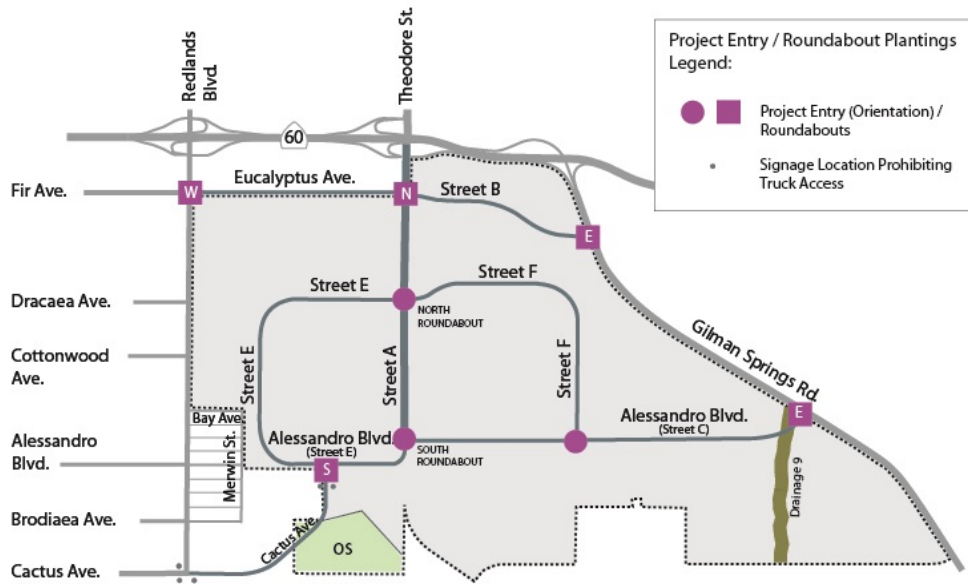
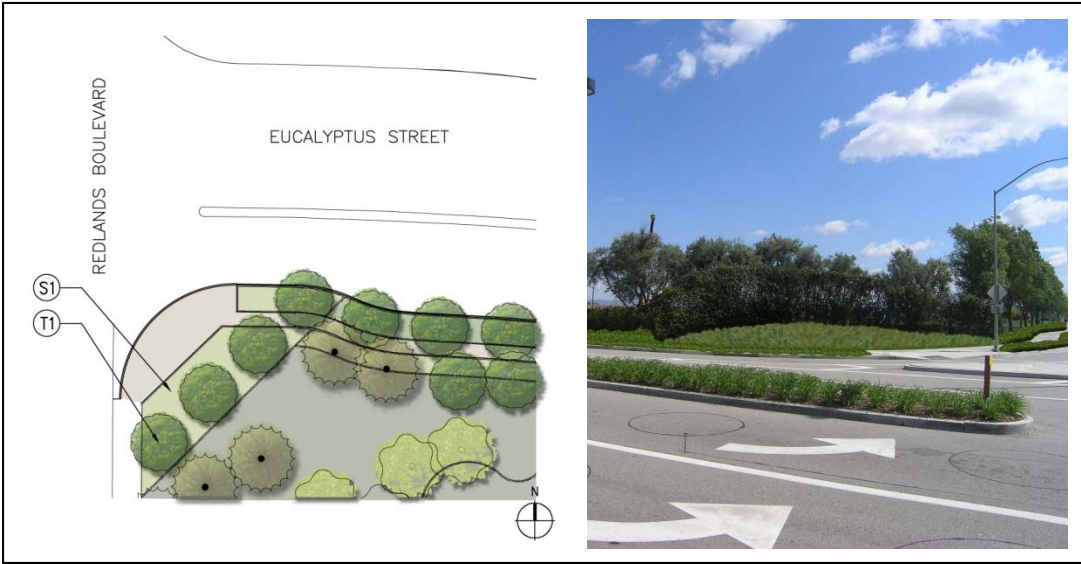


Exhibit 4-24 Roundabout & Entry Map (see pages 4-31 to 4-36)



OFF-SITE DESIGN STANDARDS

Project Entry West (Eucalyptus)



Not to scale This exhibit is a graphic representation of a conceptual design.

Trees (24" box minimum – all matching)

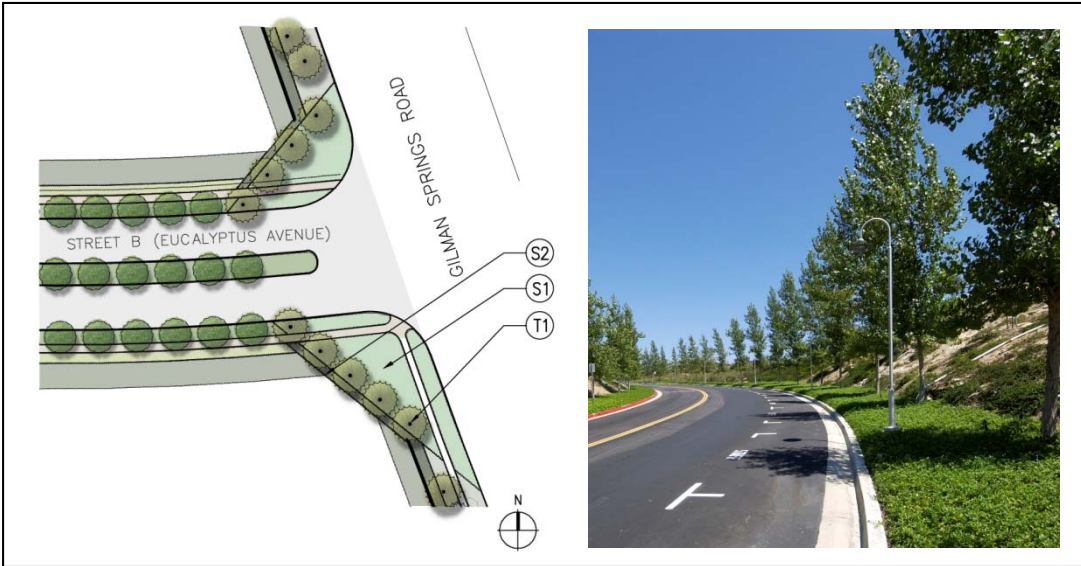
T1. *Tristania conferta*: Brisbane box

Shrubs / Ground Cover (1 gallon minimum)

S1. *Lomandra longifolia* 'Breeze': Dwarf Mat Rush



Project Entry East (Gilman Springs Road)



Not to scale | This exhibit is a graphic representation of a conceptual design.

Trees (24" box minimum – all matching)

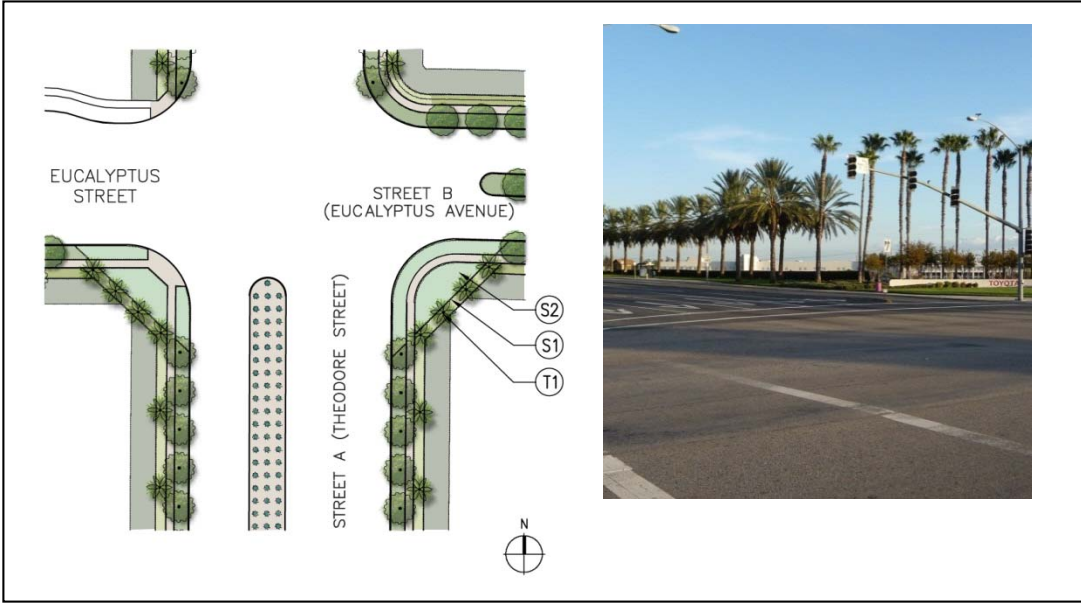
- T1. Pinus eldarica: Afghan Pine

Shrubs / Ground Cover (1 gallon minimum)

- S1. Lomandra longifolia 'Breeze': Dwarf Mat Rush
- S2. Cotoneaster lacteus: Cotoneaster



Project Entry North (Street A – Theodore Street)



Not to scale | This exhibit is a graphic representation of a conceptual design.

Trees (25' brown-trunk height--all matching)

- T1. Washingtonia robusta: Mexican Fan Palm

Shrubs / Ground Cover (1 gallon minimum)

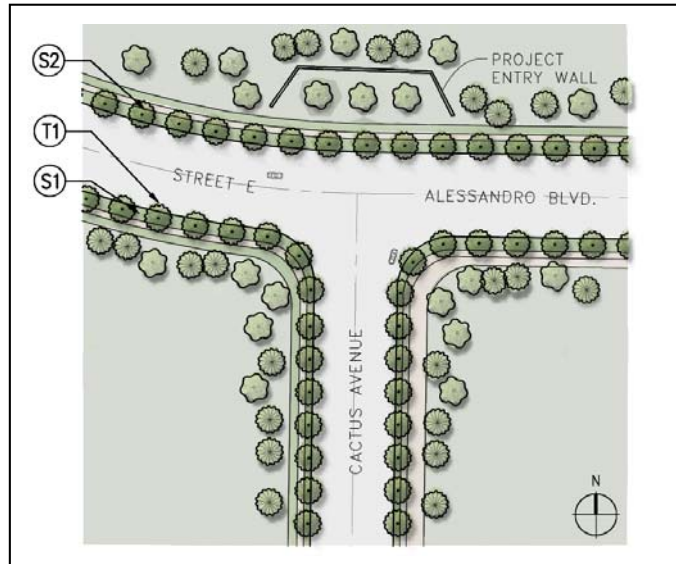
- S1. Baccharis 'Starn': Coyote Bush
- S2. Lomandra longifolia: 'Breeze': Dwarf Mat Rush



OFF-SITE DESIGN STANDARDS

Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL

Project Entry South (Cactus Avenue)



Not to scale | This exhibit is a graphic representation of a conceptual design.

Trees (24" box minimum – all matching)

T1. *Prosopis chilensis*: Chilean Mesquite

Shrubs / Ground Cover (1 gallon minimum)

S1. *Muhlenbergia rigens*: Deer Grass

S2. *Simmondsia chinensis* 'Vista': Compact Jojoba

Landscape Buffer

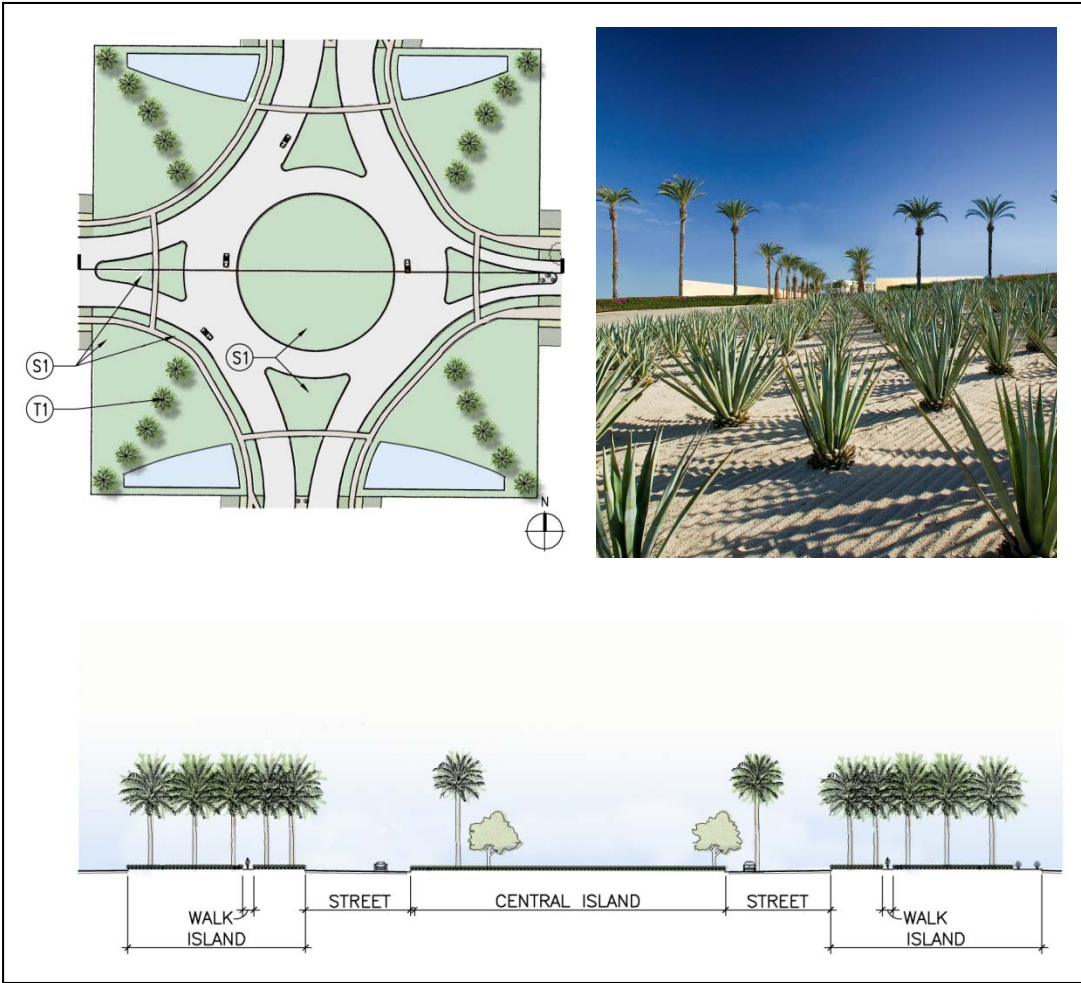
See Section 4.2.9 for Plant Palette (page 4-40)



OFF-SITE DESIGN
STANDARDS

4-34

North Roundabout



Not to scale | This exhibit is a graphic representation of a conceptual design. In connection with any development plan incorporating any or all of the roundabout, a preliminary plan for the entire roundabout shall be reviewed and approved by the City. Detailed plans will be required prior to the approval of Street Improvement Plans.

Trees (25' brown-trunk height--all matching)

T1. Phoenix dactylifera: Date Palm (to be replaced by Washington robusta: Mexican Fan Palm, in City maintained areas)

Shrubs / Ground Cover (1 gallon minimum)

S1. Lomandara longifolia 'Breeze': Dwarf Mat Rush



OFF-SITE DESIGN STANDARDS

South Roundabout



Not to scale | This exhibit is a graphic representation of a conceptual design. In connection with any development plan incorporating any or all of the roundabout, a preliminary plan for the entire roundabout shall be reviewed and approved by the City. Detailed plans will be required prior to the approval of Street Improvement Plans. Walls illustrated may or may not be a part of these plans.

Trees (25' brown-trunk height--all matching)

T1. Phoenix dactylifera: Date Palm (to be replaced by Washington robusta: Mexican Fan Palm, in City maintained areas)

Shrubs / Ground Cover (1 gallon minimum)

- S1. Lomandra longifolia 'Breeze': Dwarf Mat Rush
- S2. Baccharis 'Starn': Coyote Bush



OFF-SITE DESIGN STANDARDS

4.2.8 Streetscape Planting

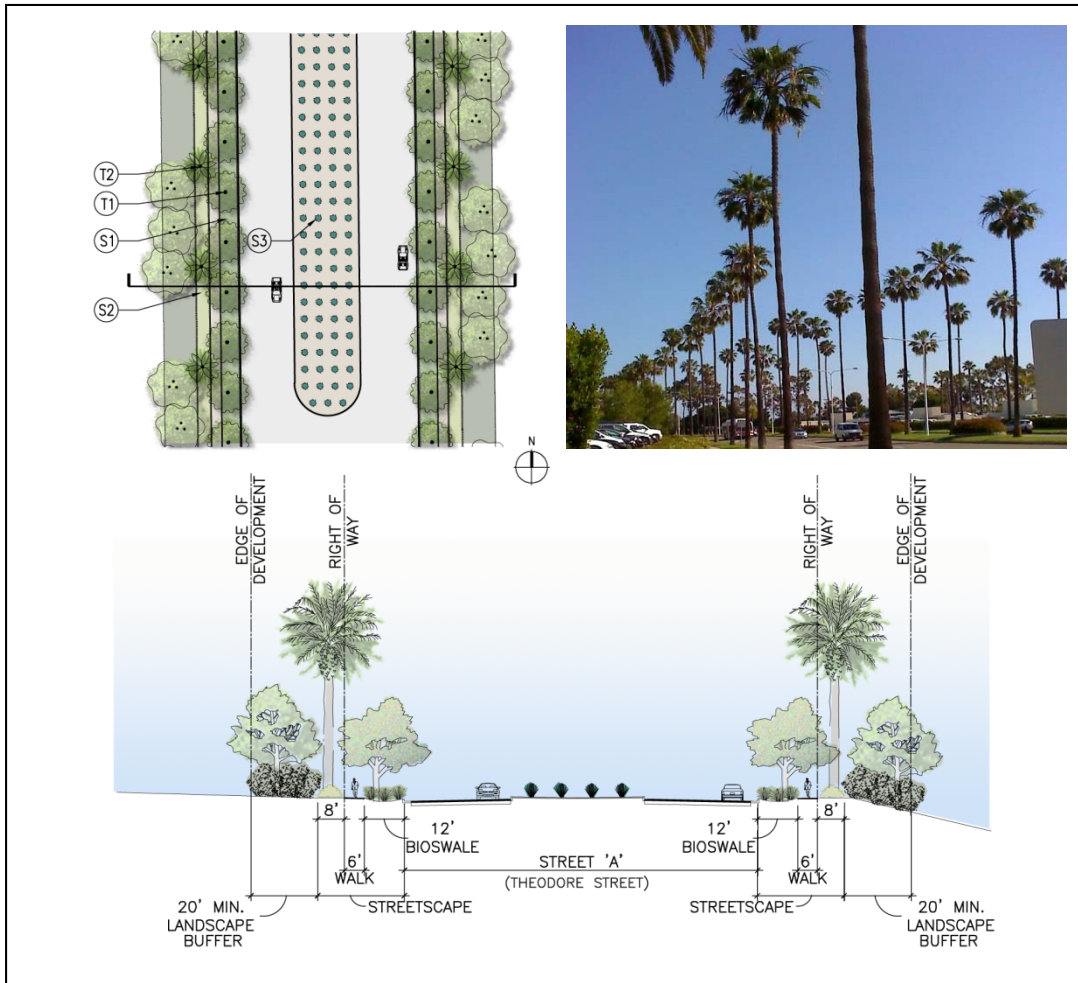


Exhibit 4-25 Streetscape Planting Map (see pages 4-38 to 4-42)



OFF-SITE DESIGN STANDARDS

Street A (Theodore Street)



Not to scale | This exhibit is a graphic representation of a conceptual design.

Trees (Palms – 25' brown trunk height, all other trees – 24" box min. – all matching)

- T1. Prosopis chilensis: Chilean Mesquite
- T2. Washingtonia robusta: Mexican Fan Palm

Shrubs / Ground Cover (1 gallon minimum)

- S1. Muhlenbergia rigens: Deer Grass
- S2. Baccharis 'Starn': Coyote Bush
- S3. Aloe vera: Aloe

Landscape Buffer

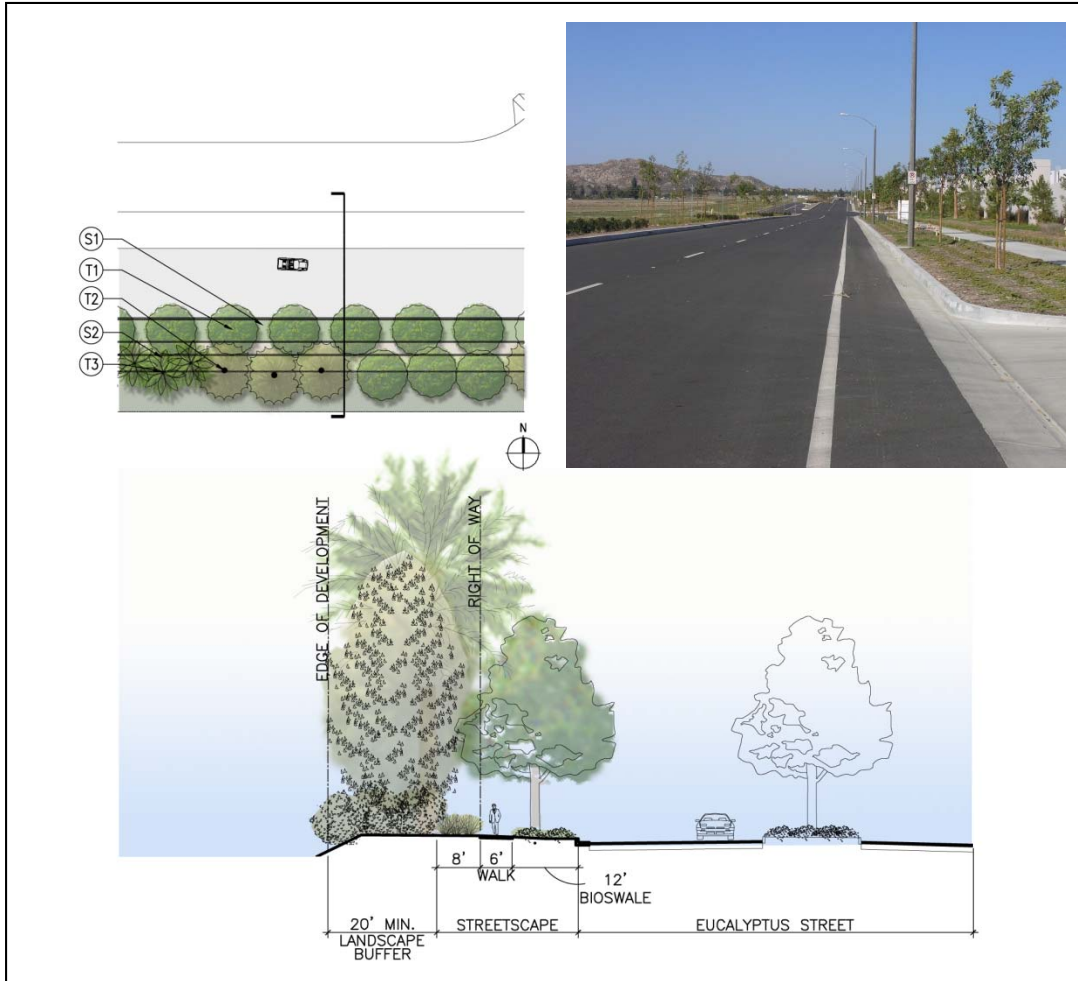
See Section 4.2.9 for Plant Palette (page 4-41)



OFF-SITE DESIGN STANDARDS

4-38

Eucalyptus Avenue



Not to scale | This exhibit is a graphic representation of a conceptual design.

Trees (Palms – 25’ brown trunk height, all other trees – 24” box min. – all matching)

- T1. *Tristania conferta*: Brisbane Box
- T2. *Pinus eldarica*: Afghan Pine
- T3. *Phoenix dactylifera*: Date Palm

Shrubs / Ground Cover (1 gallon minimum)

- S1. *Myoporum parvifolium* ‘Putah Creek’: Creeping Myoporum
- S2. *Lomandra longifolia* ‘Breeze’: Dwarf Mat Rush

Landscape Buffer

See Section 4.2.9 for Plant Palette (page 4-41)



OFF-SITE DESIGN STANDARDS

4-39

Street B (Eucalyptus Avenue Extension)



Not to scale | This exhibit is a graphic representation of a conceptual design.

Trees (24" box minimum – all matching)

T1. *Tristania conferta*: Brisbane Box

Shrubs / Ground Cover (1 gallon minimum)

S1. *Muhlenbergia rigens*: Deer Grass

S2. *Simmondsia chinensis* 'Vista': Compact Jojoba

Landscape Buffer

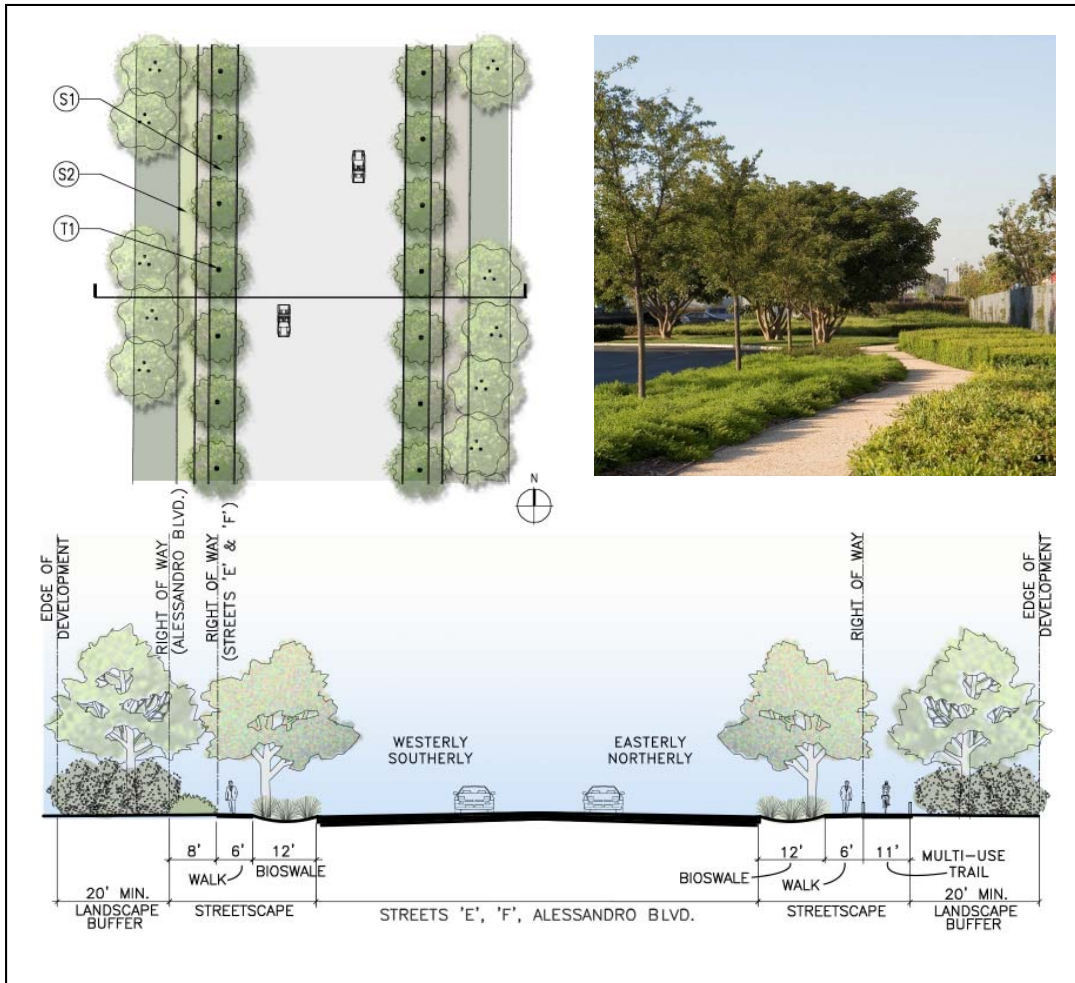
See Section 4.2.9 for Plant Palette (page 4-41)



OFF-SITE DESIGN STANDARDS

4-40

Street E, F and Alessandro Boulevard



Not to scale | This exhibit is a graphic representation of a conceptual design.

Trees (24" box minimum – all matching)

T1. Prosopis chilensis: Chilean Mesquite

Shrubs / Ground Cover (1 gallon minimum)

S1. Muhlenbergia rigens: Deer Grass

S2. Simmondsia chinensis 'Vista': Compact Jojoba

Landscape Buffer

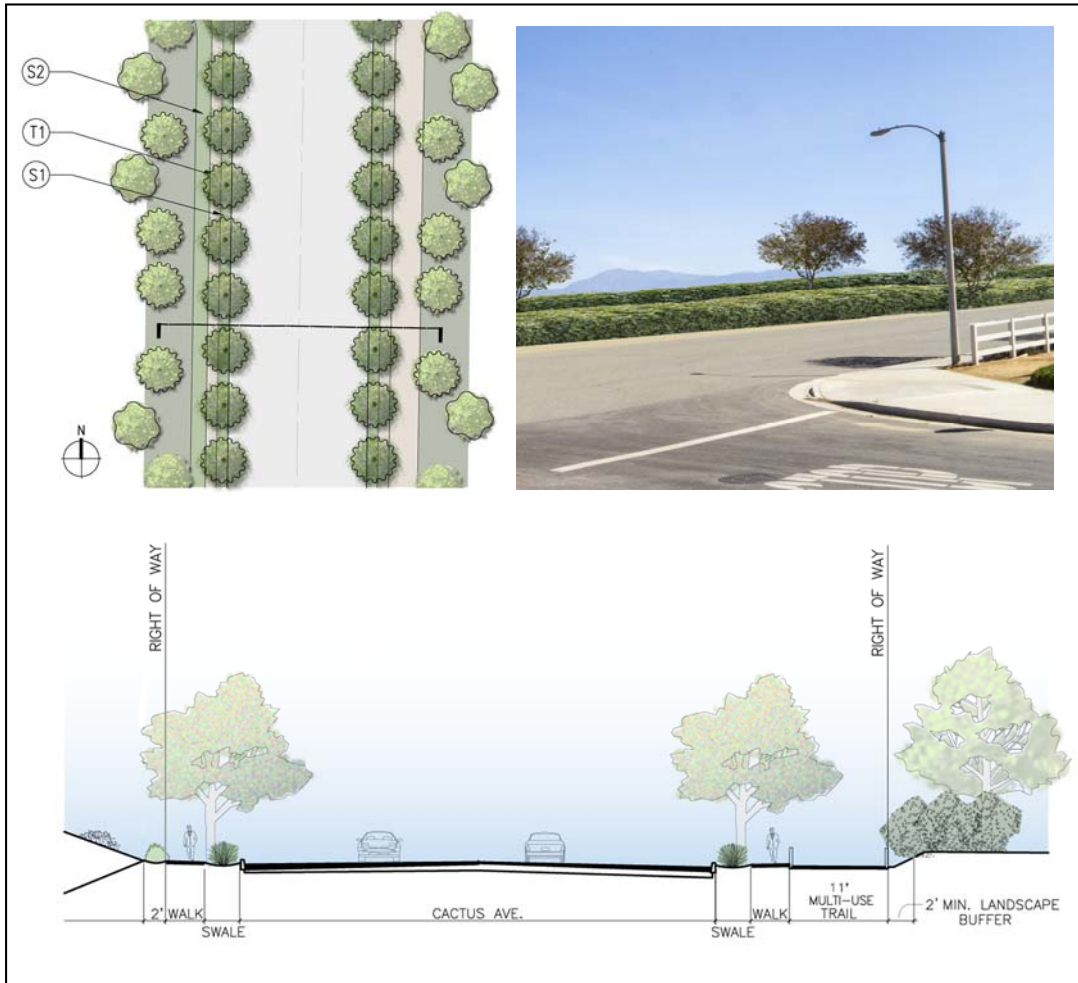
See Section 4.2.9 for Plant Palette (page 4-41)



OFF-SITE DESIGN STANDARDS

4-41

Cactus Avenue



Not to scale | This exhibit is a graphic representation of a conceptual design.

Trees (24" box minimum – all matching)

T1. *Prosopis chilensis*: Chilean Mesquite

Shrubs / Ground Cover (1 gallon minimum)

S1. *Muhlenbergia rigens*: Deer Grass

S2. *Simmondsia chinensis* 'Vista': Compact Jojoba

Landscape Buffer

See Section 4.2.9 for Plant Palette (page 4-41)



OFF-SITE DESIGN STANDARDS

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4.2.9 Offsite Plant Selection

These plant selections shall apply to those portions of the WLC property that are not within development sites. This includes common areas, open space, public areas, streetscapes, etc. All trees are to be 15 gallon (minimum) unless otherwise noted.

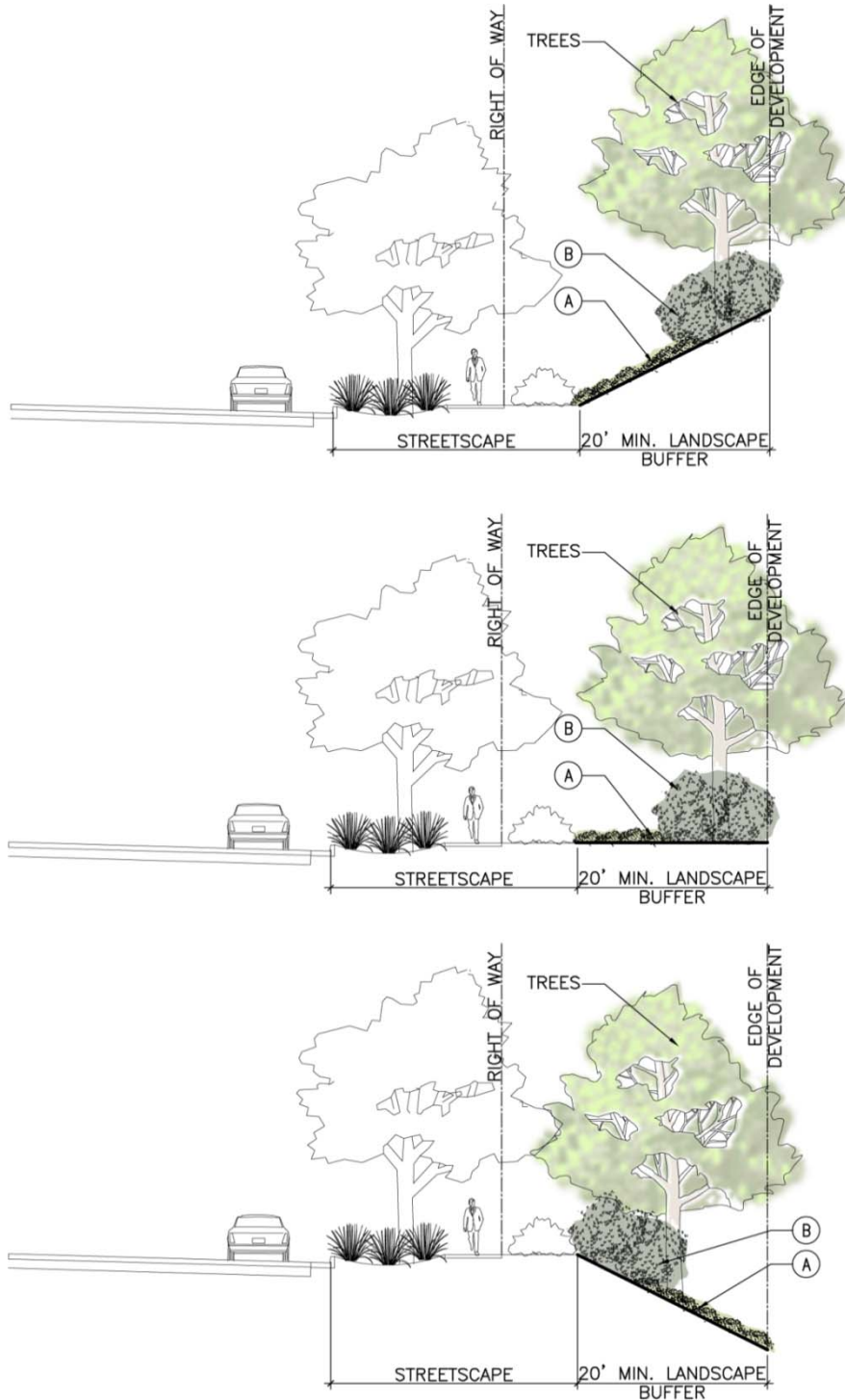


Exhibit 4-26 **Slope Planting Guideline** (From Top: Up-slope, Flat-slope, Down-slope)



OFF-SITE DESIGN STANDARDS

Landscape Buffer, Interior Slopes, and Detention Basins Plant List

Trees (15 gallon minimum)

<i>Celtis occidentalis</i>	Common Hackberry
<i>Cupressus sempervirens</i>	Italian Cypress
<i>Ebenopsis ebano</i>	Texas Ebony
<i>Olea europea</i>	Olive Tree
<i>Pinus halepensis</i>	Aleppo Pine
<i>Populus Fremontii</i>	Cottonwood
<i>Prosopis chilensis</i>	Chilean Mesquite
<i>Prosopis glandulosa</i> 'Maverick'	Thornless Texas Honey Mesquite
<i>Schinus molle</i>	California Pepper
<i>Washington robusta</i>	Mexican Fan Palm

(A) Groundcover (1 gallon minimum)

<i>Acacia redolens</i> 'Desert Carpet'	Spreading Acacia 'Desert Carpet'
<i>Baccharis</i> 'Starn'	Coyote Bush
<i>Myoporum parvifolium</i> 'Putah Creek'	Creeping Myoporum

(B) Shrubs (1 gallon minimum)

<i>Atriplex canescens</i>	Four Wing Saltbush
<i>Atriplex lentiformis</i>	Quail Brush
<i>Baccharis sarothroides</i>	Desert Broom
<i>Celtis pallida</i>	Desert Hackberry
<i>Cordia boissieri</i>	Texas Olive
<i>Dasyliirion wheeleri</i>	Desert Spoon
<i>Elaeagnus Pungens</i> 'Fruitlandii'	Fruitland Silverberry
<i>Eriogonum fasciculatum</i>	Common Buckwheat
<i>Fallugia paradoxa</i>	Apache Plume
<i>Lycium andersonii</i>	Anderson Lycium
<i>Muhlenbergia rigens</i>	Deergrass
<i>Rhus ovata</i>	Sugar Bush
<i>Simmondsia chinensis</i>	Jojoba



OFF-SITE DESIGN
STANDARDS

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4.2.10 Off-site Maintenance

Public streets (curb-to-curb), sidewalks, and trails will be maintained by the City. If the City is responsible for maintaining medians and/or curb separated parkways, funding of the maintenance will require a special financing district. These details to be established with each site specific Plot Plan application or Tentative Map.

Parkways, slopes, drainage facilities, and common areas will be maintained by a property owners' association.

4.3 Off-site Lighting

4.3.1 Objectives

Exterior lighting is to be provided to enhance the safety and security of motorists, pedestrians and cyclists.

Lighting is intended to create a night time character that reinforces the image of the World Logistics Center as a quality business location.

Lighting is an important element contributing to the identity and unity of the World Logistics Center.

To reinforce identity and unity, all exterior lighting is to be consistent in height, spacing, color and type of fixture throughout the building site and compatible throughout the World Logistics Center.

All lighting in the vicinity of the San Jacinto Wildlife Area shall be designed to confine all direct light rays to the project site and avoid the visibility of direct light rays from the wildlife area.

Street lighting on public streets shall meet the requirements of the City Standard Plans.

4.4 Off-site Utilities

4.4.1 Telephone, CATV and Similar Service Wires and Cables

All telephone, CATV and similar service wires and cables shall be installed underground.

4.4.2 Electrical Transmission Lines

Electrical transmission lines less than 115kV shall be installed underground.



OFF-SITE DESIGN
STANDARDS

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5.0 ON-SITE DESIGN STANDARDS



5.1 On-site Design Standards And Guidelines

In order to manage the orderly and consistent development of the World Logistics Center, the following design standards and guidelines will be applied to all development in the Specific Plan area.

These Design Standards and Guidelines serve to create an eco-friendly, high-quality development and establish a distinctive character for the World Logistics Center project. In reviewing development proposals, these guidelines will be the primary tool used to evaluate proposed site design, architecture, landscaping, and other project features such as lighting and site amenities.

5.1.1 General Purpose

On-site design standards and guidelines are set forth to guide the design, construction, review and approval of all buildings within the World Logistics Center. The goal is to attain the best possible design for each site within the World Logistics Center.

5.1.2 Uses Shall Be Developed In Accordance with the Specific Plan

All properties within the World Logistics Center shall be developed in conformance with this Specific Plan.

5.1.3 Uses Shall Be Developed In Accordance With City of Moreno Valley Municipal Codes

All development will be consistent with the Specific Plan objectives and design guidelines. Details of specific development projects will be determined by subdivisions and site development plans. In the event of a



ON-SITE DESIGN
STANDARDS

5-1

conflict between the Specific Plan and the City of Moreno Valley Municipal Code, the Specific Plan will prevail. If the Specific Plan is silent on a particular subject, the Municipal Code will apply.

5.1.4 Subdivision Map Act

Lots created within the World Logistics Center Specific Plan area shall comply with the Subdivision Map Act and be in conformance with the Specific Plan.

5.1.5 Water Quality Management Plan

All development within the World Logistics Center shall be subject to applicable laws of the State of California regarding water quality.

5.1.6 Trash and Recyclable Materials

All development within the World Logistics Center shall provide enclosures (or compactors) for collection of trash and recyclable materials subject to water quality standards and best management practices.

5.1.7 Waste Hauling

Construction and other waste disposal shall be hauled to a city-approved facility.

5.1.8 Water Quality Site Design

5.1.8.1 General Standards

Refer to the National Pollution Discharge Elimination System (NPDES) Permit Board Order R8-2010-0033 for complete and current information on water quality management standards. Current requirements can be obtained by visiting the State Water Resource Control Board website at www.swrcb.ca.gov.

5.1.8.2 Water Quality Management Plan

Most developments are required to implement a Water Quality Management Plan (WQMP) in accordance with the NPDES Permit Board Order R8-2010-0033. The WQMP for the Santa Ana Region of Riverside County was approved by the Santa Ana Region Water Quality Control Board on October 22, 2012. Projects identified as a 'Priority Development project' are required to prepare a Project-Specific WQMP. The MS4 Permit mandates a Low Impact Development (LID) approach to stormwater treatment and management of runoff discharges. The project site should be designed to minimize imperviousness, detain



**ON-SITE DESIGN
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runoff, and infiltrate, reuse or evapotranspire runoff where feasible. LID Best Management Practices (BMPs) should be used to infiltrate, evapotranspire, harvest and use, or treat runoff from impervious surfaces, in accordance with the Design Handbook for Low Impact Development Practices. The project should also ensure that runoff does not create a hydrologic condition of concern. The Regional Water Quality Control Board continuously updates impairments as studies are completed. The most current version of impairment data should be reviewed prior to preparation of the Preliminary and Final Project-Specific WQMP.



Example of Water Quality Feature



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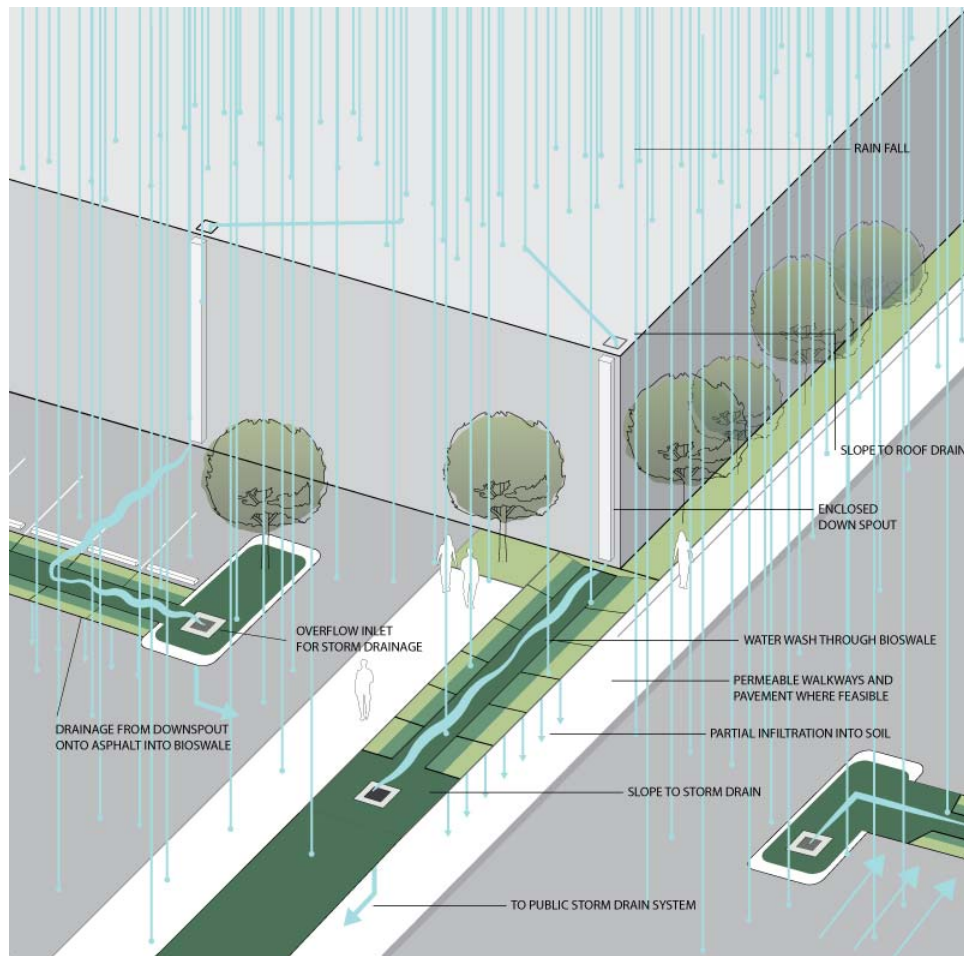


Exhibit 5-1 **Water Quality Management Diagram**

5.1.8.3 Site Design BMPs

Site Design BMPs are intended to create a hydrologically functional project design that attempts to mimic the natural hydrologic regime. In accordance with the Riverside County WQMP, project proponents shall implement Site Design concepts that achieve each of the following:

- Minimize Urban Runoff
- Minimize Impervious Footprint
- Conserve Natural Areas
- Minimize Directly Connected Impervious Areas (DCIAs)

Methods of accomplishing the Site Design concepts include:

- Maximize the permeable area.
- Incorporate landscape buffer areas between sidewalks and streets.
- Maximize canopy interception and water conservation by preserving existing native trees and shrubs, and planting additional native or drought tolerant trees and large shrubs.



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- Use natural drainage systems.
- Where soil and conditions are suitable, use perforated pipe or gravel filtration pits for low flow infiltration.
- Construct ponding areas or retention facilities to increase opportunities for infiltration consistent with vector control objectives.
- Minimize the use of impervious surfaces, such as decorative concrete, in the landscape design.
- Sites must be designed to contain and infiltrate roof runoff, or direct roof runoff to vegetative swales or buffer areas, where feasible.
- Where landscaping is proposed, drain impervious sidewalks, walkways, trails, and patios into adjacent landscaping.
- Increase the use of vegetated drainage swales in lieu of underground piping or imperviously lined swales.
- Parking areas may be paved with a permeable surface, or designed to drain into landscaping prior to discharging to the MS4.
- Where landscaping is proposed in parking areas, incorporate landscape areas into the drainage design.



Example of Water Quality Feature



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5.1.8.4 Source Control BMPs

Source Control BMPs are also required to be implemented for each project as part of the Final WQMP. Source Control BMPs are those measures which can be taken to eliminate the presence of pollutants through prevention. Such measures can be both non-structural and structural.

Non-structural Source Control BMPs include:

- Education for property owners, operators, tenants, occupants, or employees
- Activity restrictions
- Irrigation system and landscape maintenance
- Common area litter control
- Street sweeping private streets and parking lots
- Drainage facility inspection and maintenance

Structural Source Control BMPs include:

- Stenciling and signage
- Landscape and irrigation system design
- Protect slopes and channels
- Properly design fueling areas, trash storage areas, loading docks, and outdoor material storage areas

5.1.8.5 Treatment Control BMPs

The Treatment Control BMP strategy for the project is to select Low Impact Development (LID) BMPs that promote infiltration and evapotranspiration, including infiltration basins, bioretention facilities, and extended detention basins. Generally infiltration BMPs have advantages over other types of BMPs, including reduction of the volume and rate of runoff, as well as full treatment of all potential pollutants potentially contained in the stormwater runoff. It is recognized however that infiltration may not be feasible on sites with low infiltration rates, or located on compacted engineered fill. If the BMP is considered in a fill condition, and the infiltration surface of the BMP cannot extend down into native soils, or if the BMP is considered in a cut condition, and there is no practicable way to verify infiltration rates at the final BMP elevation, infiltration BMPs will not be used. Prior to final design, infiltration tests shall be performed within the boundaries of the proposed infiltration BMP and at the bottom elevation (infiltration surface) of the proposed infiltration BMP to



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confirm the suitability of infiltration. In situations where infiltration BMPs are not appropriate, bioretention and/or biotreatment BMPs (including extended detention basins, bioswales, and constructed wetlands) that provide opportunity for evapotranspiration and incidental infiltration will be considered. Harvest and use BMPs will also be considered as a Treatment Control BMP to store runoff for later non-potable uses. Ponds may be used to collect stormwater runoff for harvest and use.

5.1.8.6 Infiltration Basin

An infiltration basin is a flat earthen basin designed to capture the design capture volume. The stormwater infiltrates through the bottom of the basin into the underlying soil over a 72 hour drawdown period. Flows exceeding the design capture volume must discharge to a downstream conveyance system. Infiltration basins are highly effective in removing all targeted pollutants from stormwater runoff. The use of infiltration basins may be restricted by concerns over groundwater contamination, soil permeability, and clogging at the site. Where this BMP is being used, the soil beneath the basin must be thoroughly evaluated in a geotechnical report since the underlying soils are critical to the basin's long term performance. To protect the basin from erosion, the sides and bottom of the basin must be vegetated, preferably with native or low water use plant species.

In addition, these basins may not be appropriate for the following site conditions:

- Industrial sites or locations where spills may occur
- Sites with very low soil infiltration rates
- Sites with high groundwater tables or excessively high infiltration rates, where pollutants can affect groundwater quality
- Sites with unstabilized soil or construction activity upstream
- On steeply sloping terrain

5.1.8.7 Bioretention Facility

Bioretention facilities are shallow, vegetated basins underlain by an engineered soil media. Healthy plant and biological activity in the root zone maintain and renew the macro-pore space in the soil and maximize plant uptake of pollutants and runoff. This keeps the BMP from becoming clogged and allows more of the soil column to function as both a sponge (retaining water) and a highly effective and self-maintaining biofilter. In most cases, the bottom of a bioretention



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facility is unlined, which also provides an opportunity for infiltration to the extent that the underlying onsite soil can accommodate it. When the infiltration rate of the underlying soil is exceeded, fully biotreated flows are discharged via underdrains. Bioretention facilities therefore will inherently achieve the maximum feasible level of infiltration and evapotranspiration and achieve the minimum feasible (but highly biotreated) discharge to the storm drain system.

These facilities work best when they are designed in a relatively level area. Unlike other BMPs, bioretention facilities can be used in smaller landscape spaces on the site, such as:

- Parking islands
- Medians
- Site entrances



Example of Water Quality Feature

Landscape areas on the site can often be designed as bioretention facilities. This can be accomplished by:

- Depressing landscape areas below adjacent impervious surfaces, rather than elevating those areas
- Grading the site to direct runoff from those impervious surfaces into the bioretention facility, rather than away from the landscaping
- Sizing and designing the depressed landscape area as a bioretention facility as described in the Riverside County Low Impact Development BMP Design Handbook



**ON-SITE DESIGN
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Example of Water Quality Feature

5.1.8.8 Extended Detention Basin

The extended detention basin is designed to detain the design volume of stormwater and maximize opportunities for volume losses through infiltration, evaporation, evapotranspiration, and surface wetting. Additional pollutant removal is provided through sedimentation, in which pollutants can attach to sediment accumulated in the basin through the process of settling. Stormwater enters the basin through a forebay where any trash, debris, and sediment accumulate for easy removal. Flows from the forebay enter the top stage of the basin which is vegetated with native grasses and interspersed with gravel-filled trenches which together enhance evapotranspiration and infiltration. Water that does not get infiltrated or evapotranspired is conveyed to the bottom stage of the basin. At the bottom stage of the basin, low or incidental dry weather flows will be treated through a media filter and collected in a subdrain structure. Any additional flows will be detained in the basin for an extended period by incorporating an outlet structure that is more restrictive than a traditional detention basin outlet. The restrictive outlet extends the drawdown time of the basin which further allows particles and associated pollutants to settle out before exiting the basin, while maximizing opportunities for additional incidental value losses.



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5.2 Site Planning Guidelines

5.2.1 Overview

The World Logistics Center Specific Plan has an overall, coordinated design character that emphasizes a clean, contemporary, straightforward, quality image. This image is expressed in site planning, architecture, landscaping, and lighting.

Architectural design is to be compatible in character, massing and materials throughout The World Logistics Center, while allowing for individual identity and creativity in each project. Landscaping, building design, lighting, and utilities are to be closely coordinated along roadways. Criteria for occupancy, building heights, site planning, architecture, landscaping, and lighting are given in further detail in the following sections.

5.2.2 Design Objectives

The objective of the guidelines is to promote the planned image of a quality business and logistics center. Each site will be developed in a manner that emphasizes a clean, pleasant and contemporary environment, and produces an effect that is consistent and compatible with adjacent sites and development throughout the World Logistics Center.



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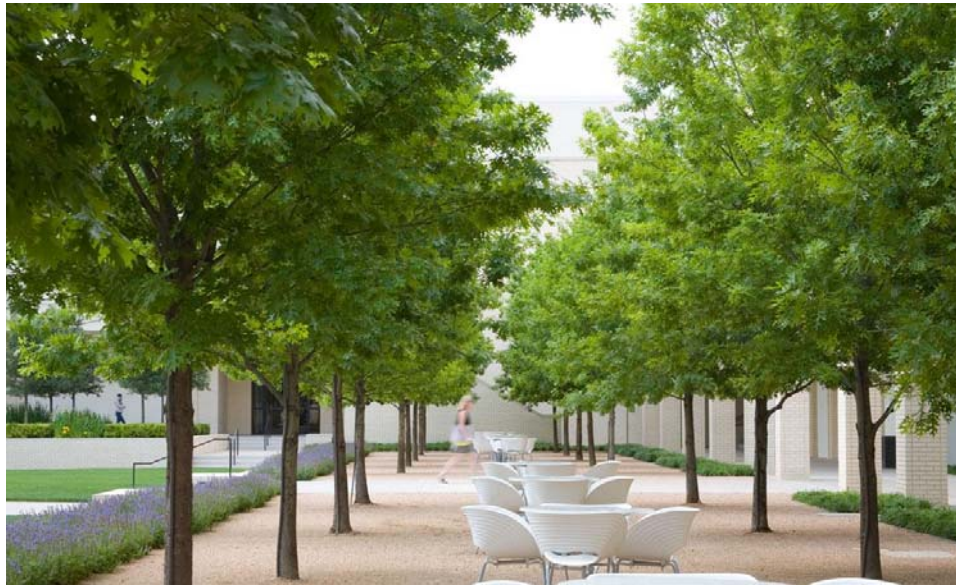
5.2.3 Sustainable Design

Building in an ecological and resource-efficient manner has many advantages for the environment as well as for building users. Sustainable design reduces pollution and conserves natural resources. The architects and engineers that make contributions to the WLC must understand this and strive to lessen the impact their designs have on the environment.

In addition, all buildings in the World Logistics Center, of at least 500,000 square feet, shall be designed to meet or exceed the LEED Certified Building Standards as described in Section 12.8.

The following sustainability goals have been set for buildings at the WLC:

- Design buildings to accommodate renewable energy systems where feasible
- Create building forms and landscape that protect patrons and employees from unpleasant climate conditions
- Use water resources responsibly with a constant effort to minimize the use of potable water
- Incorporate life cycle planning and decision making



The design of each building at the World Logistics Center will pursue these goals, by incorporating design features such as, but not limited to, the following:



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Water conservation:

- Low flow faucets and fixtures
- Rain water collection (where practical)
- Native landscape
- Direct and capture low-use irrigation and rainfall runoff to landscape areas

Energy conservation:

- Building orientation
- Glazing, overhangs, and landscaping to capture and control natural daylight
- High performance glazing
- Use of atriums, skylights and internal courtyards to provide additional daylighting

Natural resource conservation:

- Use of renewable materials where feasible
- The use of building materials with recycled content where feasible



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5.2.4 Building Location

Buildings are to be located on each site in a manner that is efficient, appropriate to site conditions, supportive of the overall architectural composition and compatible with nearby projects throughout the World Logistics Center.

- 5.2.4.1 Buildings shall be located to enhance project visibility and identity, while maintaining compatible relationships with adjacent projects and street views.
- 5.2.4.2 Buildings shall be oriented so that loading and service areas are screened from view from streets and public areas.
- 5.2.4.3 Buildings shall be arranged to provide convenient access to entrances and efficient on-site circulation for vehicles and pedestrians.
- 5.2.4.4 Buildings shall be arranged to provide landscape outdoor plazas or entries.
- 5.2.4.5 Visitor parking shall be convenient to public building entries, as shown below.
- 5.2.4.6 Indoor and outdoor break areas shall be provided convenient to major office areas.



Example of Plaza Entry



**ON-SITE DESIGN
STANDARDS**

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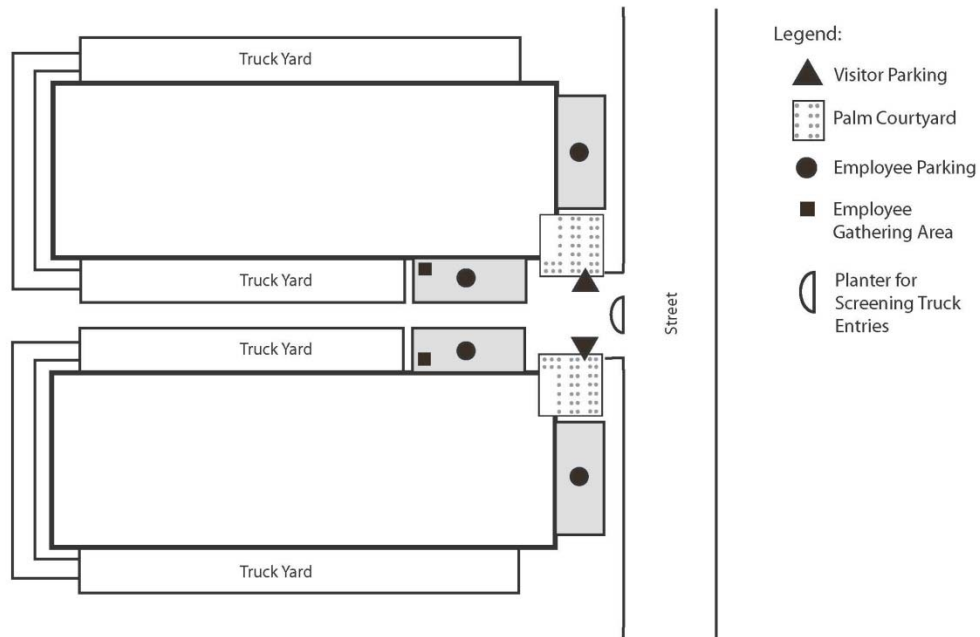


Exhibit 5-2 **Visitor Parking Plan**

5.2.5 Site Access

Vehicular access to individual sites is limited to minimize disruption of traffic flow. All access to public streets is subject to approval by the City of Moreno Valley.

5.2.6 Vehicular Circulation

Onsite vehicular circulation should be clear and direct. Dead-end parking aisles should be avoided.

5.2.7 Parking

- 5.2.7.1 Off-street parking shall be provided in accordance with the Municipal Code.
- 5.2.7.2 Off-street parking shall be provided to accommodate all vehicles associated with the permitted use of each site. On-street parking is prohibited, except in designated truck parking areas.
- 5.2.7.3 Designated spaces must be provided in convenient locations for handicap, carpool, alternate fuel vehicles, motorcycles and bicycles as required by the State of California and the City of Moreno Valley.



ON-SITE DESIGN STANDARDS

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- 5.2.7.4 Parking areas for motorcycles and bicycles are to be designed for orderly, uncluttered parking. Bicycle parking areas are to be provided with racks and locking capabilities.
- 5.2.7.5 The view of parking areas from public streets shall be softened by means of grading and/or landscaping.
- 5.2.7.6 Parking is prohibited in any required landscape areas.
- 5.2.7.7 Vehicle parking areas are to be landscaped to provide a shade canopy (50% coverage at maturity) and pleasant appearance. Planters must be large enough to avoid crowding of plant material and damage by vehicles.
- 5.2.7.8 Parking lots shall comply with the accessible parking standards required by the City of Moreno Valley.

5.2.8 Pedestrian Circulation

Safe, clear pedestrian circulation must be provided between buildings, parking areas and entries on all sites. Where a pedestrian walkway into the site from the public sidewalk is provided, it should be located at a driveway and in conformance with the street tree interval.



*Example of
Pedestrian
Walkway*

5.2.9 Truck Parking

All truck yards shall be screened from public view from adjacent streets per this Specific Plan.

5.2.10 Service Areas

Service, storage, maintenance, loading, refuse collection areas and similar facilities are to be located out of view of public roadways and buildings on adjacent sites, or screened by architectural barriers.



**ON-SITE DESIGN
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Example of Service Structure

Service areas may not extend into required building and landscape setback zones.

Service areas should be located and designed so that service vehicles have clear and convenient access and do not disrupt vehicular and pedestrian circulation. No loading or unloading is permitted from public streets.

5.2.11 Grading and Drainage

All project grading shall conform to the Municipal Code. Site grading and drainage shall be designed so that surface drainage is collected and treated before leaving the site.

Site grading shall be designed to be compatible with streetscape grades and to minimize the need for handrails or pedestrian ramps within the site.

Concrete swales in parking lots should be located at the edge of parking spaces and/or curb. Swales are prohibited in the middle of drive aisles. Directing drainage to curb and gutters is preferred over concrete swales.

Run-off from roofs, site, and impervious areas shall be directed to planter areas to minimize run-off.



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5.2.12 Walls and Fences

Walls and fences must be designed as an integral part of the overall architectural or landscaping design concept.

Within designated edge treatment areas, proposed fencing shall be included in the required Concept Plan (see Section 2.5). Along the SJWA boundary special fencing shall be used to restrict animals from passing between the SJWA property and the project site. This fencing shall be of a durable material (metal or plastic) and shall be partially buried to resist burrowing animals.

Plot Plans shall include all site fencing details.

Materials

Walls are to be constructed of materials compatible with the overall design character of the building. Walls shall be poured-in-place concrete. Fences shall be wrought iron or tubular steel. Chain link fencing is permitted only where not visible from streets, sidewalks, public parking areas or public building entries.

Design features may include:

- Varied heights, wall plane offsets, and angles.
- Pilasters or distinctive elements.
- Trim, reveals.
- Minor changes of material and finishes where appropriate.
- Trellis/vine panels, landscape pockets.



Example of Security Fence



ON-SITE DESIGN STANDARDS

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Walls within Streetside Landscape Setback

Low-profile parking lot screen walls or garden walls are permitted in street-side landscape area.

Height

Screen walls shall not exceed the height necessary to screen trucks and dock doors. Pilasters and distinctive elements may exceed this maximum.

Walls or fences in the streetside landscaping area visible from the street and not intended for screening purposes shall be limited to a height of 3' 0".

Refuse enclosures shall have walls not less than 6'-0" high. Planting areas for vines, shrubs, and trees shall be provided at the rear and sides of all enclosures.



Gates Visible From Public Areas

Pedestrian and vehicular access gates visible from public areas (i.e., parking lots, streets, sidewalks, etc.) shall be constructed of a durable material, such as tubular steel.

Prohibited Materials

Barbed wire, wire, integrated corrugated metal, electronically charged or plain exposed plastic vinyl, concrete/PCC fences are prohibited.



ON-SITE DESIGN STANDARDS

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5.3 On-site Architecture

5.3.1 Objectives

Architectural design should express the character of a corporate logistic center in a manner that is progressive and enduring. Individual creativity and identity are encouraged, but care must be taken to maintain design integrity and compatibility among all projects in order to establish a clear, unified image throughout the World Logistics Center.



Simple Form



Progressive and Enduring



Creativity and Identity



ON-SITE DESIGN STANDARDS

5.3.2 Architectural Character

Architectural character should portray a high quality image in a manner that is both progressive and timeless.

Appropriate Characteristics

- Contemporary, classic, technical style
- Clean, smooth, efficient lines
- Distinctive, but compatible image



Inappropriate Characteristics

- Trendy, historical, residential styles
- Tricky, complicated, arbitrary forms
- Sharp contrast with surroundings



ON-SITE DESIGN STANDARDS

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5.3.3 Building Heights

To maintain consistent and compatible building mass relationships, building heights are limited to the following (unless otherwise approved):

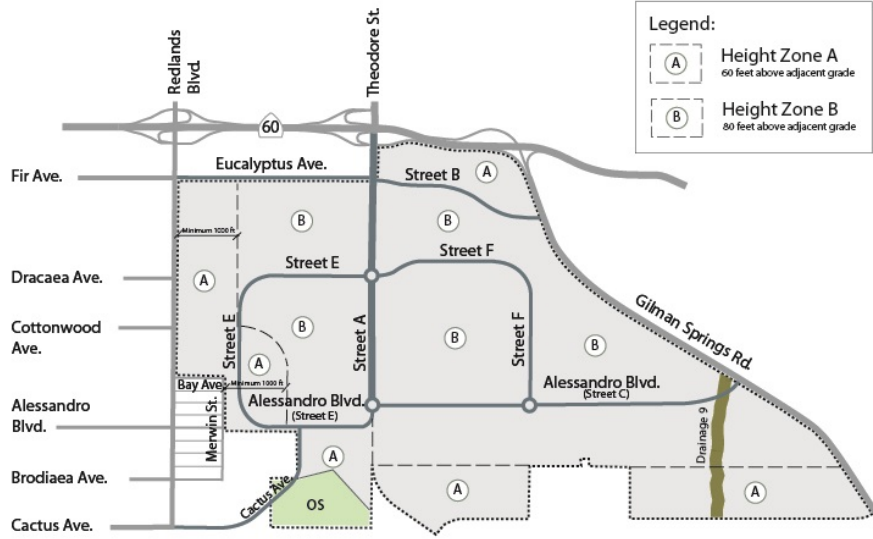


Exhibit 5-3 Building Height Plan

Area A: 60 feet above adjacent grade, including parapets, screens, and architectural features

Area B: 80 feet above adjacent grade, including parapets, screens, and architectural features

Height exceptions may be approved by the Planning Official. Exceptions up to 10 additional feet in height may be approved to accommodate special interior uses or screening of special mechanical equipment unique to these facilities. In such cases, up to twenty percent of the building footprint may exceed the height limit.



ON-SITE DESIGN STANDARDS

5.3.4 Building Form and Massing

Building design should employ clean, simple, geometric forms and coordinated massing that produce overall unity, scale and interest.

Appropriate Treatment

- Straightforward geometry
- Unified composition
- Expression of floor levels and structure
- Solid parapets



Inappropriate Treatment

- Complicated forms
- Arbitrary, inconsistent composition



ON-SITE DESIGN STANDARDS

5.3.5 Facades

Facades should reflect a coordinated design concept, including expression of building function, structure and scale. Buildings can be designed with a consistent, uniform facade; with the center of the facade emphasized; or with the corners of the facade emphasized.

Appropriate Treatment

- Straightforward, functional design
- Expression of structure
- Unity & scale reinforced through an integrated grid module



Inappropriate Treatment

- Arbitrary, inconsistent forms and decoration
- Uninterrupted, floating horizontals
- Wall-mounted



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5.3.6 Fenestration

Fenestration should be defined by function and structure, and should be consistent in form, pattern and color.

Appropriate Treatment

- Functional glass use and patterns
- Glazing delineation by mullions and structure
- Balance of wall and glazed surfaces
- Tinted or lightly reflecting glazing



Inappropriate Treatment

- Arbitrary, decorative glass patterns
- Uninterrupted horizontal glazing
- Highly reflective glass



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Glazing Colors

Preferred:	Silver, bronze, blue, green, blue-green ranges
Prohibited:	Black, gold, copper ranges
Other:	Requires specific approval



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Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL

5.3.7 Structure

Structure should be expressed clearly and consistently.

Appropriate Treatment

- Visible vertical support
- Visible structural base
- Functional, straight-forward elements
- Columns integrated into the facade
- Proper structural scale



Inappropriate Treatment

- Floating horizontal levels
- False, decorative structure
- Undersized or oversized structural components



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5.3.8 Roofs

Rooflines should be horizontal.

Appropriate Treatment

- Visible vertical support
- Horizontal planes and parapets
- Varied but proportional parapet height
- Roofing materials hidden from off-site view



Inappropriate Treatment

- Gable, hip and mansard roof forms
- Metal, tile, shingle and shake roofing
- Arbitrary decoration



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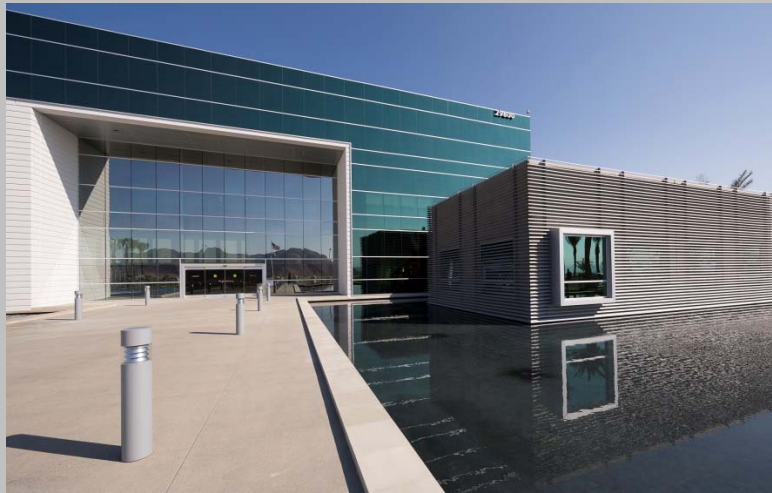
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5.3.9 Entrances

Entrances should be clearly defined and inviting.

Appropriate Treatment

- Articulation and color for identity and interest
- Light, open, inviting aspect
- Entry space sequence
- Recessed, protected doorway
- Integration with overall building form
- Coordinated landscaping



Inappropriate Treatment

- Exaggerated forms and color
- Dark, confined appearance
- Abrupt entry. Flush doorways. Tacked-on entry alcove



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5.3.10 Materials

Exterior building materials should be smooth, clean and efficient, with an appearance that is contemporary and technical.

Appropriate Materials

- Smooth, precast or tilt-up concrete
- Smooth metal panel systems
- Tinted or lightly reflective glass



Inappropriate Treatment

- Wood beams and siding, brick, Spanish tile, corrugated metal, rough concrete, or highly reflective glass
- Stucco (unless limited in use, with a smooth troweled surface detailed like concrete)



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5.3.11 Other Materials

All other materials, including Drivit[®], concrete masonry, wall tile, glass fiber reinforced concrete and new technology materials must be approved through the Plot Plan process.



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5.3.12 Exterior Colors

Exterior building colors are to be selected from the palettes below to maintain compatibility within the World Logistics Center.

Appropriate Treatment

- Concrete or stone should have light, natural finish
- Painted wall surfaces directly facing streets or public areas are to be primarily off-white or light warm shades
- Other colors are permitted on recessed or interior facing wall surfaces, or on special features, reveals or mullions
- Service doors and mechanical screens are to be the same color as the wall



Inappropriate Treatment

- Arbitrary patterns, stripes
- Garish use of color



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Primary Wall Colors

Colors for primary exterior walls are to be within the range of colors represented by the following list:

Warm Whites

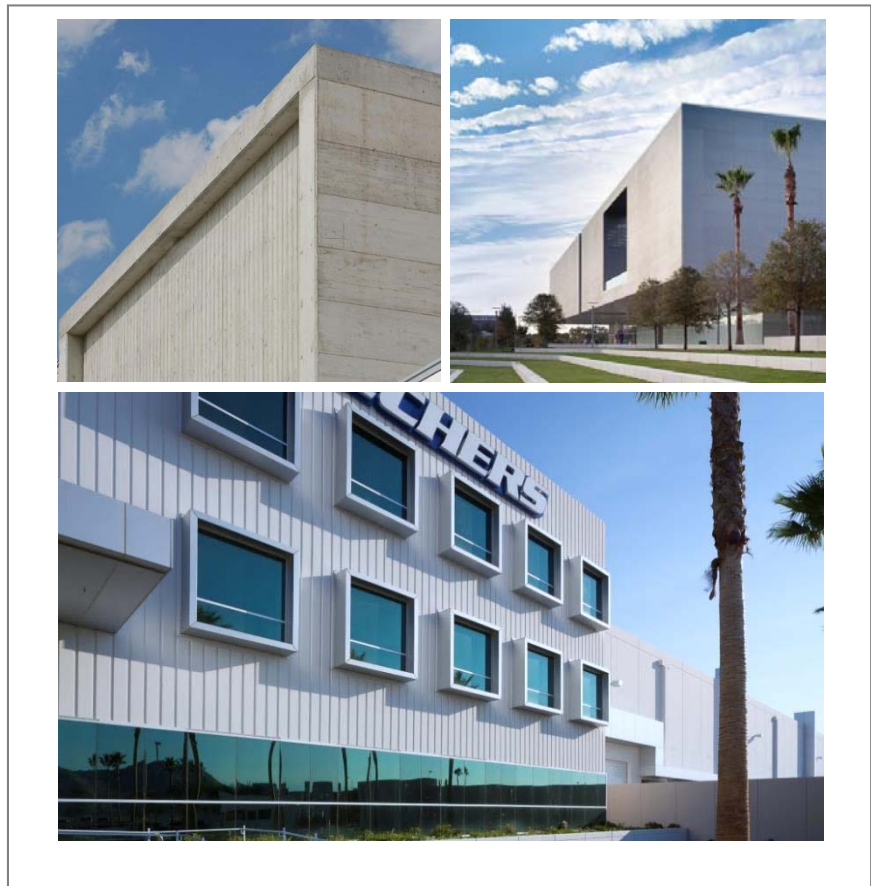
Lorette	Pantone Warm Grey 1C
Trotting	Pantone 4685C
Tracing Paper	Pantone Warm Grey 2U
Slinky	Pantone Warm Grey 1U

Cool Whites

A La Mode	Pantone 427C
Windblown	Pantone 428C
Chain Link	Pantone 434C
Carbon	Pantone 434C

Others

TBD	Pantone 7501C San Jacinto Wildlife Area Edge
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ON-SITE DESIGN STANDARDS

5.3.13 Design Details

Detailing should be clean, clear and straightforward. Details should reinforce overall design unity, interest and scale.

Appropriate Treatment

- Coordinated mullions and details
- Expression and alignment of structural connections
- Finishes commensurate with building materials
- Coordinated entry spaces and landscaping



Inappropriate Treatment

- Insufficient or excessive detailing
- Inadequate interface between materials
- No indication of scale
- Lack of interest



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5.3.14 Ground-mounted Equipment

All exterior ground-mounted equipment—including, but not limited to, mechanical equipment, electrical equipment, emergency generators, boilers, storage tanks, risers, electrical conduit, gas lines, cellular telephone facilities, and satellite dishes must be screened from on-site and off-site view. Wall-mounted equipment is not allowed.

Appropriate Treatment

- Ground equipment hidden by screen walls or landscaping
- Screen walls of same or similar material as building walls
- Vines, shrubs, trees on rear and sides of enclosure



Inappropriate Treatment

- Screen material contrasting with adjacent surfaces
- Wood or chain link fencing
- No planting areas for vines, shrubs, and trees, at the rear or sides of walled enclosures



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5.3.15 Roof-mounted Equipment

All roof-mounted equipment—including, but not limited to, mechanical equipment, electrical equipment, storage tanks, cellular telephone facilities, satellite dishes, skylights, vents, exhaust fans, smoke hatches, and ducts—must be below the top of the parapet or equipment screen. Roof access shall be through roof hatches, not exterior ladders. Roof hatches shall be located so that guardrails at parapets are not required.

Appropriate Treatment

- Rooftop equipment hidden from off-site view by building parapet or equipment screen
- Rooftop screens fully integrated into architecture



Inappropriate Treatment

- Rooftop equipment extending above parapet or screen
- One-sided rooftop screens that do not hide the equipment from view from secondary streets or from adjacent sites
- Rooftop screens too close to parapet
- Rooftop screens not related to building geometry
- Wood rooftop screens



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5.3.16 Ancillary Structures

On a case by case basis, additional buildings may be required to house functions for the proper operation of the facility. The design guidelines found herein apply to all structures regardless of the time of construction, location on site, or use they contain.

5.3.17 Building Appurtenances

On a case by case basis, the proper functioning of a facility may require a piece of equipment, ductwork, shaft, conveyance mechanism, etc. to be physically added to the side of the main building. These appurtenances must comply with the guidelines stated herein to allow for aesthetic continuity.



Example of a Building Appurtenance



5.3.18 Cameras

The location, appearance, and installation of exterior security cameras must be integrated with the architecture. The top of any roof-mounted camera must be below the top of the parapet, screened from view from the ground. Parapet-mounted cameras are not allowed. Exposed wires are not allowed. The color of the camera housing must match the color of the poles or the building wall. The color of the camera globe must be clear.

Appropriate Treatment

- Cameras mounted on poles in parking lot (preferred)
- Cameras suspended from soffits (second choice)
- Cameras mounted on building walls with the top of the camera below the top of the parapet (third choice)



Inappropriate Treatment

- Wall-mounted cameras with the top of the camera above the top of the parapet
- Black camera globes
- Exposed wires
- Parapet-mounted cameras
- Roof-mounted cameras visible from the ground
- Cameras mounted in spheres on arms projecting from building walls.



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5.4 On-site Landscaping

5.4.1 Objectives

Landscaping is an important element contributing to the identity and unity of the World Logistics Center. As such, all landscaping for the project shall:

- Promote a pleasant, distinctive, corporate environment,
- Augment internal cohesion and continuity within the World Logistics Center,
- Enhance the structured urban design concept of the World Logistics Center, and
- Promote water conservation.

The landscaping design concept is focused toward:

- Providing a clean, contemporary visual appearance,
- Coordinating the landscaping treatment along freeway and surface streets to emphasize the circulation system,
- Coordinating streetscapes within the World Logistics Center to unify its general appearance, and
- Coordinating on-site landscaping design continuity among individual development sites within the World Logistics Center.

The following guidelines present parameters for general landscape design, water conservation, streetscapes, and on-site landscaping.

5.4.2 Water Conservation Measures

The World Logistics Center employs an aggressive approach to water conservation. Every element of the landscape program has been evaluated to determine how to achieve the project's landscape goals while consuming as little water as possible. From the formulation of the overall landscape concept, through each level of the design process, to the day-to-day maintenance practices of the installed materials, conservation of limited water resources is a constant primary focus.

This approach represents a significant departure from conventional development strategies, particularly in a large-scale master-planned logistics campus setting. Most of the project will be designed without mechanical irrigation, relying instead on maximizing the collection and harvesting of runoff to be directed to landscape areas. This program will



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require the use of carefully selected plant types, complex drainage designs, intricate planting techniques, and specialized maintenance programs.

Implementation of these new design concepts will result in a landscape aesthetic that will appear different than traditional landscape treatments. At installation, plant material will be smaller and with greater spacing in order to match available water to the needs of specific plants. As landscaping gets established, coverage may take longer, certain plants will appear dry as they go through dormant periods, and in some cases supplemental watering may be necessary in periods of severe drought. At maturity, the landscaping at the WLC project will provide a strong, clean, simple design element, demonstrating the WLC's commitment to the creation of a successful logistics campus in a sustainable environment.

The landscape program will incorporate the following design elements and practices to minimize the use of limited water resources:

Project Design:

- Design project so that pads, streets and other paved areas drain to landscape areas, medians and parkways,
- Maximize water harvesting, retention and treatment techniques throughout the project
- Utilize zero-inch curb design to facilitate rainwater runoff from road surfaces
- Direct rooftop and parking area runoff to bioswales, basins or landscaped areas

Landscape Design:

- Develop watershed areas for the project areas in order to manage water harvesting and distribution
- Calculate estimated runoff from roofs and paved areas to manage water harvesting and retention practices
- Conduct site-specific analyses of seasonal weather patterns, rain patterns, soils and drainage, grades and slopes, macro and micro climates, solar exposure, prevailing wind conditions, historical evapotranspiration rates and weather station (CIMIS) data
- Design to meet peak moisture demand of all plant materials within design zones and avoid flow rates that exceed infiltration rate of soil
- Maximize the use of drought tolerant plant species
- Select plant palettes tolerant of periodic inundation from storm water runoff



**ON-SITE DESIGN
STANDARDS**

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- Calculate optimum spacing of plants to avoid overcrowding and need for excessive irrigation.
- Select container plant sizes are to achieve a high root to canopy ratio; no root bound or oversized plants

Construction:

- Grade all planting areas to control high intensity rainfall and runoff episodes. Provide riprap at downspouts; create multiple watersheds to disperse water flow. Use surface mulch and straw wattles.
- Grade all planting areas to provide for the retention and infiltration of water to each plant.
- Provide soil amendment to plant pits based upon soil laboratory test results and landscape species.
- Construct planting pits to be 3-4 times the diameter of the planting container and twice as deep.
- Provide a pre-hydration program prior to planting installation to reflect climate and soil conditions.
- Cover all planting areas with a combination of organic and inorganic mulches to be used along with pre-emergent herbicide treatment to control weed growth and soil erosion.
- Install soil moisture sensors in strategic planting zones.
- Require certification that the irrigation system was installed and operates as designed, and conduct a post-installation audit of actual water consumption
- Provide for supplemental irrigation on an as-needed basis, such as supply lines and valves, quick-connect couplers or water truck service.

Maintenance:

- Establish maintenance guidelines to specify actions to replace dead plants, replenish surface mulch, and remove trash and weeds.
- Regularly monitor all landscaped areas and make adjustments as necessary to assure the health of planted materials and progress toward meeting the project's landscape goals.

Where irrigation is provided:

- Use planting zones coordinated according to plant type, climatic exposure, soil condition and slope to facilitate use of zoned irrigation systems Use reclaimed water systems if available and practical,
- Use best available irrigation technology to maximize efficient use of water, including moisture sensors, multi-program electronic timers, rain shutoff devices, remote control valves, drip systems, backflow preventers, pressure reducing valves and precipitation-rated sprinkler heads,
- Use gate valves to isolate and shut down mainline breaks,



ON-SITE DESIGN
STANDARDS

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- Use wind shut-off sensors for the irrigation controllers,
- Design irrigation systems to prevent discharge onto non-landscaped areas or adjacent properties,
- Restrict irrigation cycles to operate at night when wind, evaporation and activity are at a minimum

Coverage:

- At installation, plant size, density and spacing shall be as specified in approved landscape plans at 15% coverage.
- Based on these design guidelines and average annual rainfall, irrigated and non-irrigated planting groups shall achieve 70% coverage after three years. Until plant material achieves full coverage, a minimum of 3" of mulch will be maintained throughout planted area, and any growth (e.g. weeds) not included in the Specific Plan plant palette shall be removed twice per year (March and September).

5.4.3 Landscape Criteria

Onsite landscaping is to be coordinated in a manner that enhances overall continuity of development in the World Logistics Center, while providing for the individual identity and needs of each project within. The design must address the following criteria.

- Landscaping should be used to reinforce site planning principles, such as using trees to define parking lots and drive aisles.
- Plant materials for on-site landscaping are to be selected from the Plant Selection List, Section 5.4.4.
- Flexibility in the choice of plant materials is limited along street frontages and site perimeters to enhance landscaping coordination along common frontages, but increases toward the site interior to accommodate individual design.
- Landscaping in parking areas shall comply with the standards contained in the Municipal Code.
- Planting areas for vines, shrubs, and trees is required at the rear and sides of walled enclosures, including trash enclosures.
- Comprehensive planting, including trees, is required along all screen walls, buildings and site perimeters.
- All projects which include designated truck loading areas shall screen such areas from view from adjacent public streets and from onsite visitor parking and building entry areas (palm courts). Such screening shall be accomplished with solid block walls and opaque metal gates.



**ON-SITE DESIGN
STANDARDS**

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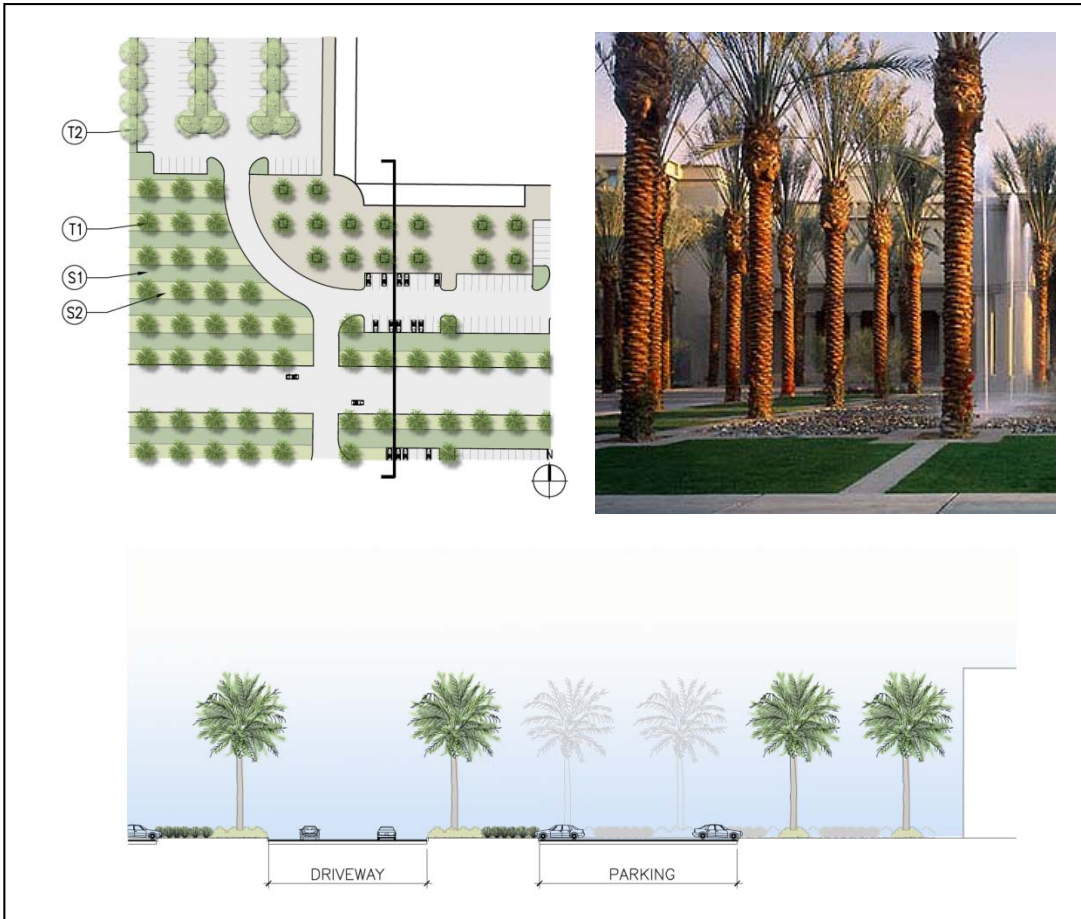
- Landscaping within truck loading areas, not visible from public view, shall be designed to be sustainable without artificial irrigation, relying on rainfall and runoff from adjacent impervious surfaces (i.e. truck yards and building roofs). The landscape design shall also incorporate sustainable techniques to capture and direct rainfall runoff to these landscape areas. These areas may include slopes, water quality basins and drainage facilities. Rock or organic mulch shall be placed between plantings to provide coverage and erosion protection.
- Landscaping in visitor parking areas, palm courts and any other areas visible from public view shall have a higher level of landscape treatment and shall utilize an automatic irrigation system to maintain the desired level of landscape appearance. The landscape design shall incorporate sustainable design techniques to capture and direct rainfall runoff to landscape areas, reducing the need for supplemental irrigation.



**ON-SITE DESIGN
STANDARDS**

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Palm Court



Not to scale | This exhibit is a graphic representation of a conceptual design at maturity.

Trees (Palms – 25’ brown trunk height / All other trees – 24” box minimum)

- T1. Phoenix dactylifera: Date Palm
- T2. See section 5.4.4 for plant list

Shrubs / Groundcover (1 gallon minimum)

- S1. Muhlenbergia rigens: Deer Grass
- S2. See section 5.4.4 for plant list



Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL

ON-SITE DESIGN STANDARDS

5.4.4 On-site Landscape Planting

All trees to be 15 gallon, minimum, unless otherwise noted.

Trees

Acacia aneura	Mulga
Acacia farnesiana	Sweet Acacia
Caesalpinia cacalaco	Cascalote
Celtis occidentalis	Common Hackberry
Cercidium 'Desert Museum'	Desert Museum Palo Verde
Chilopsis linearis	Desert Willow
Cupressus sempervirens	Italian Cypress
Ebenopsis ebano	Texas Ebony
Olea europaea	Olive
Phoenix dactylifera	Date Palm
Pinus brutia var. Eldarica	Afgan Pine
Pinus halepensis	Aleppo Pine
Populus Fremontii	Cottonweed Tree
Prosopis alba	Argentine Mesquite
Prosopis chilensis	Chilean Mesquite
Prosopis glandulosa	Texas Honey Mesquite
Prosopis glandulosa 'Maverick'	Thornless Texas Honey Mesquite
Schinus molle	California Pepper
Tristania conferta	Brisbane Box
Washingtonia filifera	California Fan Palm
Washingtonia robusta	Mexican Fan Palm

Shrubs / Groundcover

Abutilon palmeri	Indian Mallow
Acacia greggii	Catclaw Acacia
Acacia redolens 'Desert Carpet'	Spreading Acacia 'Desert Carpet'
Aloe spp.	Aloe
Atriplex canescens	Four Wing Saltbush
Atriplex lentiformis	Quail Bush
Baccharis sarothroides	Desert Broom
Baccharis 'Stam'	Coyote Bush
Caesalpinia pulcherrima	Redbird of Paradise
Calliandra californica	Baja Fairy Duster
Celtis pallida	Desert Hackberry
Cordia boissieri	Texas Olive
Dasyilirion wheeleri	Desert Spoon
Encelia farinosa	Desert Encelia
Fallugia paradoxa	Apache Plume
Hyptis emoryi	Desert Lavender
Isomeris arborea	Bladderpod
Justicia californica	Chuparosa
Leucophyllum texanum	Texas Ranger
Lycium andersonii	Anderson Lycium



WORLD
LOGISTICS
CENTER®

ON-SITE DESIGN
STANDARDS

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Rhus ovata
Salvia greggii
Senna nemophila
Senna phyllodinea
Simmondsia chinensis

Sugar Bush
Autumn Sage
Desert Cassia
Silver Cassia
Jojoba

Perennials and Grasses

Asclepias subulata
Baileya multiradiata
Eriogonum fasciculatum
Penstemon eatoni
Penstemon parryi
Sphaeralcea ambigua
Muhlenbergia rigens
Nolina parryi

Desert Milkweed
Desert Marigold
Common Buckwheat
Firecracker Penstemon
Parry Penstemon
Desert Globe Mallow
Deer Grass
Parry Beargrass



ON-SITE DESIGN STANDARDS

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Attachment: Exhibits A, B, C to Proposed Ordinance_ Change of Zone (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL

5.4.5 Minimum Landscape Areas

If parking or access drives are located between any building and a public street frontage, a 15-foot minimum landscaping area is required between the parking or drive aisle and the building. On other sides of the building, a 10-foot minimum landscaping area is required between the parking or drive aisle and the building, except in loading areas.



1. A minimum landscape zone 15 feet is required along building perimeters facing a roadway frontage.
2. A minimum landscape zone of 10 feet is required along all other building perimeters except loading areas.
3. A minimum landscape zone of 5 feet is required along all internal property lines.
4. A minimum flat landscape zone of 8 feet is required next to screen walls facing the street.

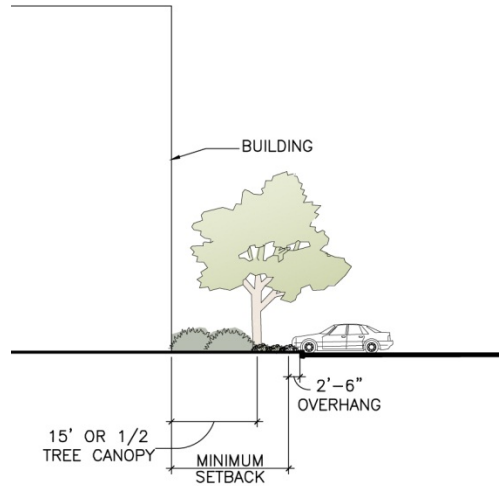
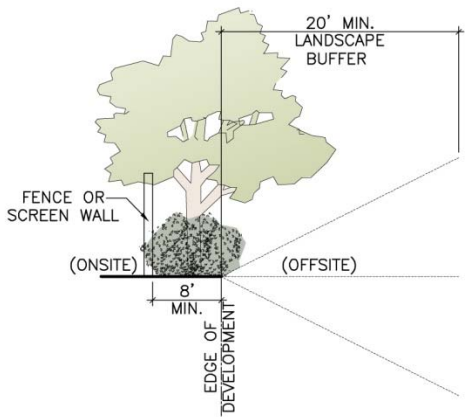
Note: If perpendicular parking spaces are located adjacent to the minimum landscape zone, then a 2'-6" minimum parking overhang is required in addition to the above measurements (17'-6", 12'-6" and 7'-6" respectively).

Trees along screen walls, buildings and site perimeters are required at a minimum average spacing of 1 tree per 30 linear feet of perimeter, planted at 15 feet or half (1/2) the tree canopy spread from the face of building.



**ON-SITE DESIGN
STANDARDS**

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Left: Landscape Setbacks on Slopes
 Right: Landscape Setbacks from Face of Building.

5.4.6 Furnishings

Site Furnishings

Site furnishings such as benches, tables, trash receptacles, planters, tree grates, kiosks, drinking fountains, and other pedestrian amenities should be integral elements of the building and landscape design, and placed at building entrances, open spaces and other pedestrian areas to create a pedestrian friendly environment. Site furnishings should not block pedestrian access or visibility to plazas, open space areas and/or building entrances and should be made of durable, weather-resistant materials.



Example of Site Furniture



ON-SITE DESIGN STANDARDS

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5.5 On-site Lighting

5.5.1 Objectives

Exterior lighting is to be provided to enhance the safety and security of motorists, pedestrians and cyclists.

Lighting is intended to create a nighttime character that contributes to the identity and unity of the World Logistics Center as a quality business location.

To reinforce identity and unity, all exterior lighting is to be consistent in height, spacing, color and type of fixture throughout the building site.

All lighting in the vicinity of the San Jacinto Wildlife Area shall be designed to confine all direct light rays to the project site and avoid the visibility of direct light rays from the wildlife area.

5.5.2 General On-site Lighting Parameters

To ensure consistency throughout the World Logistics Center, on-site lighting must conform to the overall lighting parameters for the World Logistics Center, including the following:

- 5.5.2.1 Onsite lighting includes lighting for parking areas, vehicular and pedestrian circulation, building exteriors, service areas, landscaping, security and special effects.
- 5.5.2.2 All exterior on-site lighting must be shielded and confined within site boundaries. No direct rays or glare are permitted to shine onto public streets or adjacent lots.
- 5.5.2.3 Lighting fixtures are to be of clean, contemporary design.
- 5.5.2.4 Lighting must meet all requirements of the City of Moreno Valley.
- 5.5.2.5 Tilted wall fixtures (i.e. light fixtures which are not 90 degrees from vertical) are not permitted. Lights mounted to the roof parapet are not permitted. Wall-mounted light fixtures used to illuminate vehicular parking lots are not permitted.




**ON-SITE DESIGN
STANDARDS**

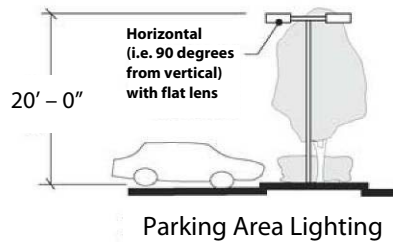
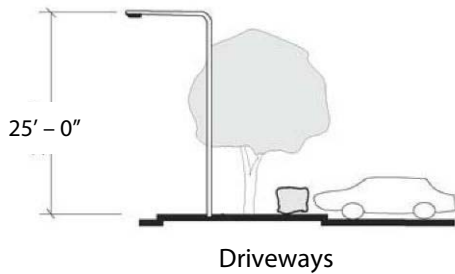
5-48

5.5.2.6 Wall-mounted utility lights that cause off-site glare are not permitted. "Shoebox" lights are preferred.

5.5.3 Driveways and Parking Area Lighting

5.5.3.1 All driveways and parking lot lighting shall utilize cut-off fixtures (i.e. the lens is not visible from an angle). Pole height for typical lots shall be as follows:

• Driveways	25' Maximum	
• Parking Area	20' Maximum	



5.5.3.2 Pole bases in paved areas shall be above grade. They may be round or square. Pole bases in planting areas may be no higher than 6 inches above grade.

5.5.3.3 Both luminaires and poles are to be white.

5.5.3.4 All luminaires shall be metal halide or L.E.D.

5.5.4 Pedestrian Circulation Lighting

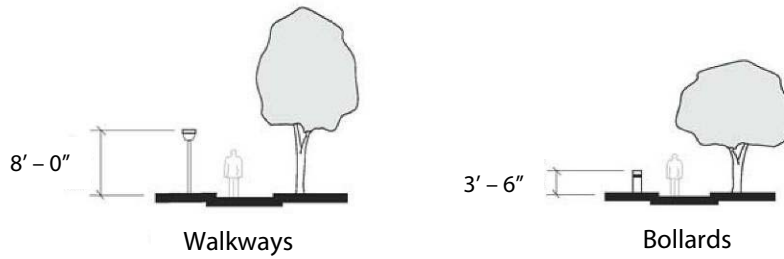
5.5.4.1 Pedestrian walkways and building entries will be illuminated to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry to the building.

5.5.4.2 Walkway lighting must have cut-off fixtures mounted at a uniform height no more than eight (8) feet above the walkway.



ON-SITE DESIGN STANDARDS

5.5.4.3 Building entries may be lit with soffit, bollard, step or comparable lighting.



5.5.4.4 Step or bollard lighting shall be used to clearly illuminate level changes and handrails for stairs and ramps.

5.5.4.5 Bollards may be used to supplement and enhance other pedestrian area lighting. Bollard height shall not exceed forty-two (42) inches.

5.5.4.6 Courtyards, arcades and seating areas shall be illuminated to promote pedestrian use and safety. A variety of lighting may be used to create interest and special effects in coordination with the character and function of the area.

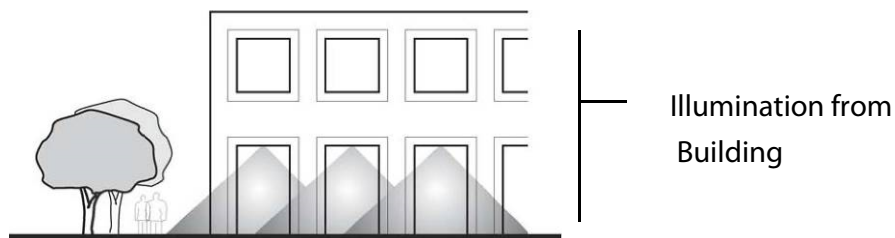
5.5.4.7 Pedestrian lighting shall be subdued warm-white Mercury or incandescent lamps.

5.5.5 Architectural Lighting

Architectural lighting effects are encouraged to promote nighttime identity and character.

5.5.5.1 All exterior architectural lighting shall utilize indirect or hidden lighting sources. Acceptable lighting includes wall washing, overhead down lighting and interior lighting that spills outside.

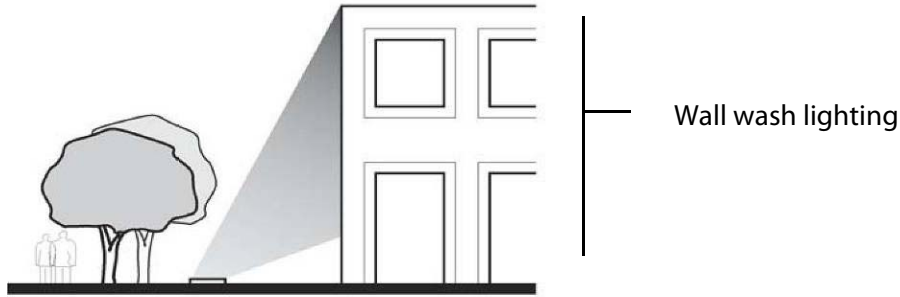
5.5.5.2 Building entry areas should be lit so as to provide a safe and inviting environment.



ON-SITE DESIGN STANDARDS

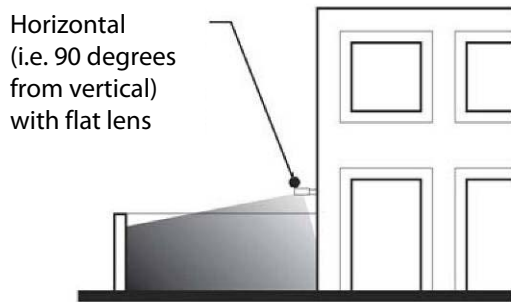
5-50

5.5.5.3 All building exteriors facing a freeway must have lighting levels that vary to accent the structure, texture, relief, and/or the color of the building. Lighting levels may not be flat or uniform.



5.5.6 Service Area Lighting

Service area and security lighting must be visible only within the limits of the service area.



Lighting contained within service area

5.5.6.1 Wall-mounted, security-type, service area lighting fixtures may be used only in screened service areas and only if direct light is kept within these areas. In all other areas, wall-mounted service lighting must consist of cut-off type fixtures.

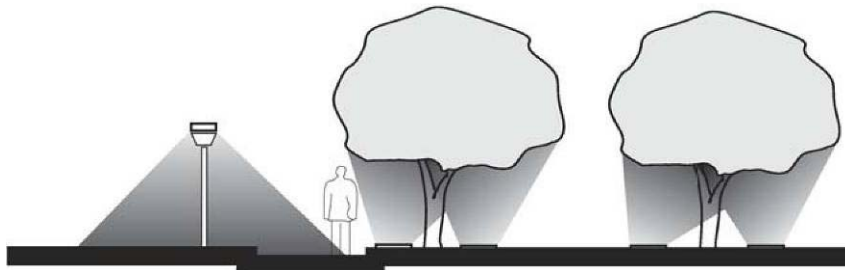
5.5.6.2 Service area and security lighting may not be substituted for pedestrian, architectural or parking area lighting.

5.5.6.3 Freestanding fixtures shall be painted the same as parking area fixtures. Any wall-mounted fixtures should be compatible with the wall.



5.5.7 Accent Lighting

Unique lighting may be used to feature architectural elements, landscaping, entries and pedestrian areas, provided it is compatible with all other lighting. Accent lighting used in landscaping and pedestrian areas shall employ light sources such as Metal Halide, Quartz or L.E.D in order to accurately render plants, vegetation, and skin colors.



Landscape Lighting



5.6 On-site Utilities

5.6.1 Utility Connections and Meters

All utility connections and meters shall be coordinated with the development of the site and should not be exposed, except where required by the utility. Utility connections should be integrated into the building or screened by landscape.

5.6.2 Pad-Mounted Transformers and Meter Box Locations

Pad-mounted transformers and/or meter box locations shall be screened from view from surrounding properties and public rights-of-way. Utilities shall be located underground, wherever possible.

5.6.3 All Equipment Shall be Internal to Buildings

All equipment shall be internal to buildings to the greatest extent possible. When unfeasible, all such equipment shall be screened and not prominently visible from public rights-of-way.

5.6.4 Utilities (including backflow preventers, detector check assemblies, transformers, etc.)

All utilities are to be installed underground. Easements for underground utilities that preclude the planting of trees may not be located where the design guidelines require the planting of trees.

Any necessary above ground equipment such as detector check assemblies, backflow preventers, transformers, etc., shall be screened from view from public areas by landscaping.

Domestic water service shall be extended through development sites in an easement to EMWD. The water line and easement shall be placed in easily accessible locations, such as drive aisles. Fire service and domestic water services and meters shall tie into this line. This line may become part of a loop system and the property owner may need to tie into the public mainline to provide a loop water system to provide adequate water volumes to fire hydrants.



**ON-SITE DESIGN
STANDARDS**

5-53

6.0 SUSTAINABILITY

It is the intent for this development to be a model of sustainability. While this goal is measured in many different ways and the elements of sustainability are constantly evolving, it remains the intent of the WLC to be on the forefront of environmentally sensitive development.

The following are some ways individual projects can incorporate elements of sustainability:

1. Accommodate alternate forms of transportation including, public transportation (bus), charging stations for electric cars, carpooling, and bicycles.
2. Promote the riding of bicycles, through the provision of bike racks / storage, showers and changing rooms.
3. Meet the most current storm water management programs, including on-site water capture methodologies.
4. Reduce the 'heat-island' effect by incorporating lighter paving materials where possible and light roofing materials on all structures.
5. Employ adequate shielding features to ensure zero light spill off-site.

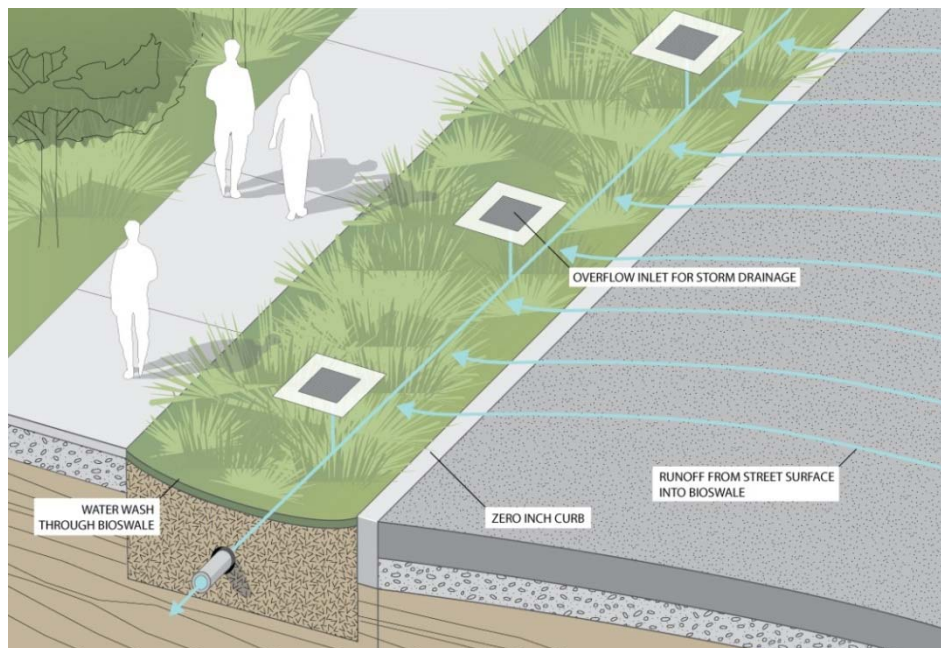


Exhibit 6-1 **Off-site Water Management Plan**



SUSTAINABILIT

6-1

6. Incorporate drought tolerant plant materials throughout.
7. Minimize water use in restrooms.
8. Go beyond code-required commissioning in order to ensure all mechanical and electrical equipment are operating efficiently and are not wasting energy.
9. Incorporate on-site renewable energy.
10. Employ a recycling program.
11. Divert construction waste from landfills.
12. Incorporate recycled materials where feasible.
13. Ensure high indoor air quality standards.
14. Incorporate low-emitting adhesives, paints, coatings, and flooring systems.
15. Increase the amount of day-light into the interior spaces.
16. Increase the amount of interior space with exterior views.
17. Incorporate the best available technologies or best management practices where feasible.
18. Limit idling of engines to three minutes.
19. Utilize onsite electric power sources as much as possible to minimize the use of portable, mobile power generators.



Example of Bio-swale



SUSTAINABILIT

6-2

7.0 SIGNAGE

All signage in this Specific Plan shall conform to an approved Sign Program on file with the City of Moreno Valley.

7.1 Regulatory Signage

All regulatory signage (traffic control, public safety, etc.) shall comply with city standards.



SIGNAGE

7-1

8.0 PROJECT PHASING

8.1 Overall Project Phases

The project is expected to be developed in two phases. Phase 1 includes the western portion of the project area extending from Redlands Boulevard to Street F and from Eucalyptus Avenue to south of Alessandro Boulevard. Phase 2 includes the portions of the project along SR60, Gilman Springs Road and the southerly site boundary.

Development will occur as dictated by market and other condition as determined by the developer. Notwithstanding this phasing projection, any portion of the property may be developed at any time at the owner's discretion subject to the development of infrastructure to support it. Infrastructure needs and timing will be evaluated along with subsequent development proposals.

8.2 Infrastructure Phasing

Each project within the World Logistics Center will be supported by the requisite infrastructure as needed, subject to federal, state and local codes.

Each plot plan will include proposals for specific infrastructure improvements needed to support each proposed building.

These improvements shall be consistent with the overall infrastructure plans serving the World Logistics Center.

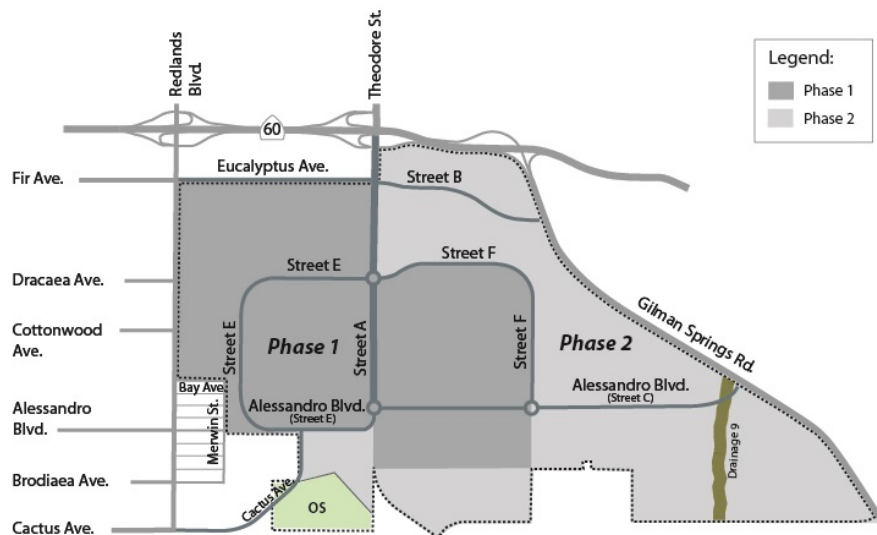


Exhibit 8-1 Phasing Plan



PROJECT PHASING

9.0 PROPERTY MAINTENANCE

9.1 On-site Improvements

On-site improvements shall be maintained by the property owner or tenant, pursuant to private contractual terms.

9.2 Common Area Improvements

Major slopes, landscape areas, community entries, community signage, etc., shall be maintained by a property owners' association.

9.3 Parkways

Parkways within public rights-of-way shall be maintained by a property owners' association or by a maintenance district.

9.4 Streets

Public streets (curb-to-curb), public sidewalks, and public trails shall be maintained by the City of Moreno Valley.



PROPERTY
MAINTENANCE

9-1

10.0 FINANCING OF IMPROVEMENTS

A facilities financing program is important for implementation of the Specific Plan. The financing program needs to assure the timely financing of public streets, utilities, and other necessary capital improvements.

Financing for infrastructure improvements encompasses a variety of different mechanisms, processes, and costs that vary based on the type and purpose of an improvement, financial market conditions, debt service considerations, and agency capabilities and policies.

10.1 Capital Financing

Major infrastructure, such as water, sewers, storm drains and roads, may be financed by a special tax established through the formation of a community facilities district (CFD). Another approach may be to create a bond assessment district. Both types of financing districts require tax liens to be placed on participating properties to underwrite the sale of bonds to finance specified improvements. These mechanisms require that the facility to be financed be a public improvement and that participating properties receive a benefit from that improvement. The form of financing selected, if any, will be determined based on the type of uses and pace of development that occurs within the project. Examples include:

1. Community Facility District
2. Other forms of Assessment Districts
3. Facilities Benefit Assessment
4. City/ county direct investment
5. Reimbursement Agreements
6. State and/or federal grants and loans

The developer may elect to use private capital to finance major infrastructure improvements, as well as in-tract improvements to avoid long-term debt assessment upon buyers of improved land.



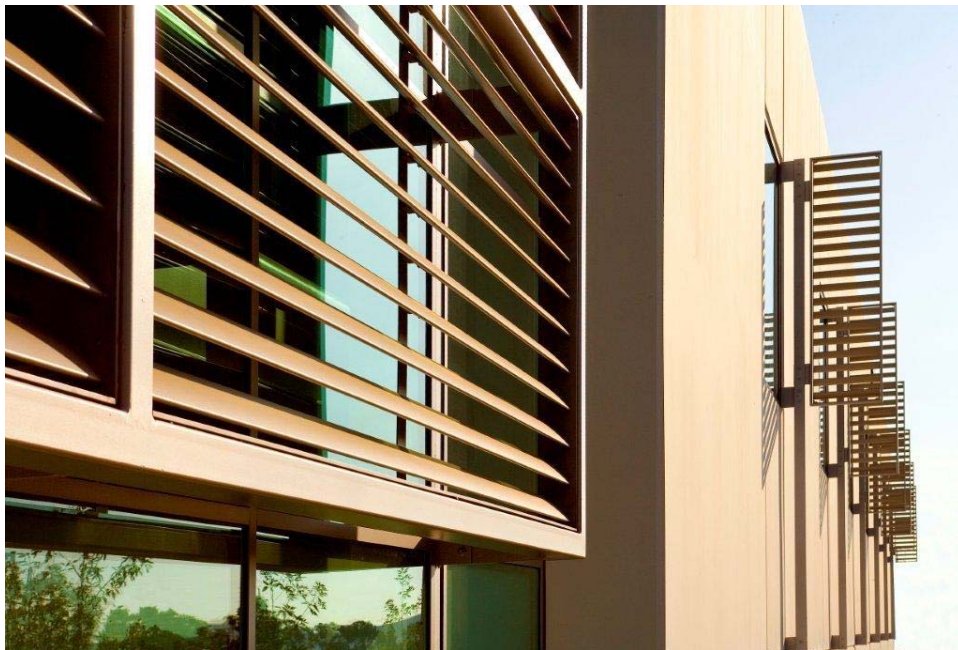
10.2 Capital Funding

The method of infrastructure funding will be determined during the engineering review of implementation development plans and in conjunction with the phasing of the infrastructure. Some possible funding mechanisms for the Specific Plan public improvements are listed below:

1. Development Impact fees
2. Transportation fees (e.g. TUMF)
3. Special taxes
4. Connection fees

10.3 Funding of Maintenance

Funding for on-going maintenance for common areas and other public improvements which may be a condition of development, such as street lights, parkway and median landscaping, other right of way improvements will be funded privately through a Property Owners' Association (POA) or publicly through the Community Services Districts (CSD) or structured as a Landscape and Lighting Maintenance District, Community Facilities District or other financing mechanism.



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FINANCING OF
IMPROVEMENT

10-2

11.0 IMPLEMENTATION



11.1 Purpose and Intent

This section contains the procedures for the processing of discretionary development applications to implement the terms of the World Logistics Center Specific Plan. The City will review all development within the project to ensure compliance with the provisions of the Specific Plan.

11.2 Approvals Required

All development within the World Logistics Center is subject to the approval of a Plot Plan in conformance with these procedures.

Modifications to the development standards contained in the Specific Plan may be requested by any property owner and may be approved by the City through the variance processes described in Section 11.3.3 herein.

11.3 Development Review Process

11.3.1 Subdivisions

All proposed subdivisions within the World Logistics Center shall be processed in accordance with the provisions of the state Subdivision Map Act and the Municipal Code.

11.3.2 Plot Plans

- a. All development proposals within the World Logistics Center shall be subject to the approval of a Plot Plan as described herein. Property and building maintenance activities such as painting, site or building repairs,



IMPLEMENTATI

11-1

parking lot resurfacing/restriping, and landscape maintenance and repair, etc. are exempt from these regulations.

b. The Plot Plan process is intended to ensure that all development proposals comply with all applicable standards and guidelines contained in this Specific Plan and are not detrimental to public health, safety or welfare.

c. Plot Plan applications shall be submitted to the City in conformance with the procedures contained in the Municipal Code .

d. The Community Development Director may approve, conditionally approve, or disapprove a Plot Plan application as provided for in the Municipal Code or may elevate the application to the Planning Commission for review and action. Considerations for Planning Commission review of a plot plan application may include but are not limited to:

1. The need for preparation of a Supplemental Environmental Impact Report or other appropriate environmental document due to new circumstances that become present and constitute potential for significant impacts which were unknown and could not have been known at the time of the approval of this Specific Plan

2. If any buildings greater than 500,000 square feet cannot meet LEED Certified Building Standards and/or buildings are not consistent with Specific Plan energy efficiency standards

3. Building elevations not consistent with the Specific Plan design guidelines

4. Future modification to any state or federal regulations requiring review of such Specific Plan permitted development

e. Project comments received from the Architectural Review Committee of the World Logistics Center Property Owners' Association shall receive consideration in the review process.

f. Public noticing shall be in compliance with the Municipal Code

g. A Plot Plan may be approved if all of the following findings are made:



IMPLEMENTATI

11-2

1. The proposed project is consistent with the goals, objectives and policies of the General Plan,
 2. The proposed project complies with this Specific Plan and other applicable regulations, and
 3. The proposed project will not be detrimental to the public health, safety or welfare or materially injurious to properties or improvements in the vicinity,
- h. Reasonable conditions of approval may be imposed to ensure compliance with applicable laws, regulations and standards or to enable the required findings to be made.

11.3.3 Variances

Alternatives to development standards and regulations contained herein may be approved through the following variance procedures. Variance applications may be processed along with Plot Plan applications, or as separate applications.

11.3.3.1 Administrative Variances

- a. The purpose of an administrative variance is to provide an administrative procedure for adjustments to certain regulations in this Specific Plan in order to prevent hardships that might result from a strict or literal interpretation and enforcement of those regulations.
- b. The standards and procedures for the submittal, review and approval of an Administrative Variance shall be as contained in Section 9.02.090 of the Municipal Code.

11.3.3.2 Other Variances

- a. All other variance applications shall be processed in accordance with Section 9.02.100 of the Municipal Code

11.3.4 Appeals

- a. Any interested party may appeal any administrative decision to the Planning Commission subject to the provisions of Section 9.02.240 of the Municipal Code.
- b. Any interested party may appeal any decision of the Planning Commission to the City Council subject to the provisions of Section 9.02.240 of the Municipal Code.
- c. The decision of the City Council is final.



IMPLEMENTATI

11-3

11.4 Covenants, Conditions, and Restrictions (CC&Rs)

The WLC property will be subject to CC&Rs that address issues such as common area improvements, maintenance, community signage, architectural guidelines, etc. The City will review the CC&Rs to insure that they contain the necessary provisions for property maintenance. Prior to the recordation of any final map within the WLC (excluding finance maps), said CC&Rs shall be recorded.

11.5 Other Uses

All uses established within the WLC shall be consistent with the General Plan and this Specific Plan. The Community Development Director shall be responsible for all consistency determinations pursuant to Section 9.01 of the Municipal Code.

11.6 Additional Items

Any items not addressed in the Specific Plan shall be subject to the regulations of the Municipal Code.

11.7 Specific Plan Amendments

Any proposal to amend this Specific Plan shall be processed in the same manner as the original approval subject to the provisions of Chapter 9.13 of the Municipal Code.



IMPLEMENTATI

11-4

12.0 SPECIAL REGULATIONS

The following regulations apply to all development within the World Logistics Center. These restrictions shall be imposed on all discretionary permits for new development projects, as applicable.

12.1 Secure Trucking Areas

All truck areas shall be secured with manned gates during building operation.

12.2 Engine Restrictions

All trucks with a gross vehicle weight of 15,000 pounds or more entering any warehouse facility must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other non-diesel fuel source. Facility operators shall maintain a log of all trucks entering a warehouse site to document that this requirement is met. This log shall be available for inspection by the City at any time.

12.3 On-site Service Vehicles

The use of diesel-powered service yard vehicles (yard goats, etc.) is prohibited at all times within the Specific Plan area. Pallet jacks, forklifts, and other onsite equipment used during building operation (indoors or outdoors) shall be powered by electricity, natural gas, propane, or other non-diesel fuel.

12.4 Property Maintenance Equipment

Electrical power sources will be provided both indoors and outdoors to accommodate the use of electric property maintenance equipment.

12.5 Continued Agricultural Activities (Right-to-Farm)

As the World Logistics Center develops, logistics land uses will begin to locate in proximity to existing agricultural activities. Where non-agricultural uses locate near agricultural uses, there is the potential for conflict. These potential conflicts result from the inherent attributes of agricultural operations, including noise, odor, dust, smoke, operation of machinery (including aircraft), crop dusting, storage and disposal of manure, flies, rodents, chemical fertilizers, soil amendments, herbicides, pesticides and the hours of operation. As a result, such agricultural operations can become the subject of nuisance complaints and could be pressured to cease or curtail operations or may be discouraged from making farm improvements.



**SPECIAL
REGULATIONS**

12-1

To protect the continued viability of agricultural operations within the World Logistics Center, it is the intent of this Specific Plan to limit the circumstances under which pre-existing agricultural operations may be deemed to constitute a nuisance. The intent of this policy of the Specific Plan is to balance the rights of farmers to produce agricultural commodities with the rights of non-farmers who own, occupy or use land adjacent to agricultural property. This right-to-farm policy applies to all legally established agricultural operations existing at the time of the effective date of the World Logistics Center Specific Plan.

12.6 Air Quality and Noise Assessment

To address the relationship between development areas and adjacent residential areas, all site development permit applications for properties adjacent to residentially occupied or zoned properties shall include detailed air quality and noise assessments to determine appropriate project design features to meet the performance requirements of the WLC project Environmental Impact Report.

12.7 Solar Commitment

All logistics buildings within the LD and LL categories shall provide rooftop solar energy systems sized to offset the power demands of office space contained in the building.

12.8 LEED Standards

All buildings in the World Logistics Center, of at least 500,000 square feet, shall be designed to meet or exceed LEED Certified status in accordance with LEED standards and criteria in effect as of the date of approval of this Specific Plan. Such standards and criteria are contained in the following documents:

- LEED Reference Guide for Green Building Design and Construction – LEED 2009
- Green Building and LEED Core Concepts Guide – Second Edition
- LEED for New Construction 2009 Reference Guide – LEED v2.2, Third edition
- LEED for Core and Shell 2009 Reference Guide
- LEED Reference Guide for Green Interior Design and Construction – LEED 2009
- LEED for Commercial Interiors 2009 Reference Guide
- Advanced Energy Modeling for LEED: Technical Manual v1.0



**SPECIAL
REGULATIONS**

12-2

- LEED Reference Guide for Green Building Operations and Maintenance – LEED 2009

12.9 Alessandro Boulevard – Historical Landmark

A portion of the alignment of historic Alessandro Boulevard, as established by Resolution CPAB 88-2, runs through the WLC area. The Specific Plan recognizes the landmark status of this roadway and provides for the preservation of its entire 120-foot right-of-way through the project.

Most of this historic right-of-way is included within Alessandro Boulevard as shown on the Specific Plan exhibits. As the WLC is developed, Alessandro Boulevard will be built to modern roadway standards within the historic alignment. In order to meet these standards, very minor portions of this roadway MAY fall outside of the historic right-of-way. In those instances, the historic right-of-way will be retained and may be improved with walks, trails, landscaping or similar compatible improvements.

In the southwestern portion of the WLC, vehicular traffic will be prohibited on a short reach of historic Alessandro Boulevard. The purpose of this restriction is to reduce through traffic and associated impacts on the existing residential portion of Alessandro Boulevard. This right-of-way will be retained and will be available for use for a future multi-use trail, pedestrian access, emergency access, and monuments, signs or other displays recognizing Moreno Valley's rich history.

Prior to approval of any development including or adjacent to the historic Alessandro Boulevard right-of-way, a concept plan for its entire length shall be submitted to and approved by the Planning Commission.



**SPECIAL
REGULATIONS**

12-3

13.0 DEFINITIONS

12kV/115 kV overhead power lines Power lines that distribute electrical power into and through the World Logistics Center project. While 12kV lines are generally placed underground, 115kV lines must remain aboveground due to the heat generated by the flow of electrical energy in the lines.

Accessory Structure A separate building, the use of which is incidental to that of the main building on the same lot or premises, and which is used exclusively by the occupant of the main building.

Ancillary Structures See accessory structure

Arterial Streets A highway intended to serve through traffic where access rights are restricted and intersections with other streets or highways are limited

Badlands A rugged, mountainous area located easterly of the City of Moreno Valley, east of Gilman Springs Road in Riverside County.

Bioretention Facilities Soil and plant-based filtration devices that remove pollutants through a variety of physical, biological, and chemical treatment processes. These facilities normally consist of a grass buffer strip, sand bed, ponding area, organic layer or mulch layer, planting soil, and plants.

Building height The vertical distance from the adjacent grade to the highest point of a building exclusive of vents, air conditioners, or other such incidental appurtenances.

Class II bikeways A striped lane located along the right shoulder of a roadway designated for use by bicyclists.

CNG/LNG Abbreviation for Compressed Natural Gas (CNG) and Liquefied Natural Gas (LNG).

Collector Roads A street intended to convey traffic into and through an area from local roads to arterial streets

Cut-off fixtures A lighting fixture designed to eliminate light rays from escaping above a horizontal plane.

Detention basins A drainage feature that has been designed to allow large flows of water to enter but limits the outflow by having a small opening at the lowest point of the outlet structure.

Drainage 9 Refers to an existing ephemeral drainage located in the eastern area of the Specific Plan from Gilman Springs Road flowing south to the SJWA as shown on Exhibit 1-2. This watercourse is referred to as Line E in the drainage studies



DEFINITIONS

13-1

contained in the DEIR. Line E collects water under Gilman Springs Road at Culvert 5.

Eastern Municipal Water District (EMWD) The water district which provides potable water, recycled water and wastewater treatment for the World Logistics Center project.

Facades An exterior side of a building, usually, but not always, the front.

Fenestration The design of openings in a building or wall, generally including windows, doors, louvers, vents, openings, skylights, storefronts, etc.

Floor area ratio A measure of the intensity of development of a particular site. The ratio is calculated by dividing the building area by the parcel area, using the same unit of measure (acres, square feet, etc.)

Heavy truck A truck having four axles or more.

High-cube warehouse A building used for the storage and/or consolidation of manufactured goods prior to distribution to secondary retail outlets, generally 500,000 square feet or more, often divided for multiple tenants. High-cube warehouse and logistics facilities include ancillary office and maintenance space along with the outdoor storage of trucks, trailers, and shipping containers.

High-cube logistics warehouses are generally constructed with vertical-lift dock-high roll up doors to allow access for the loading and unloading of products from truck/trailers. Building interiors are typically large and open to accommodate the temporary storage and consolidation of the products to be distributed.

Highland Fairview Corporate Park A mixed use business park made up of logistics and commercial land uses located between Redlands Blvd and Theodore Street, southerly of SR60.

Impervious paved surface Artificial surfaces such as pavement (roads, sidewalks, driveways and parking lots) that are covered by impenetrable materials such as asphalt, concrete, brick, and stone. Also includes building rooftops and other structures that prevent water from penetrating into the ground surface.

Infiltration Basin A shallow impoundment that is designed to infiltrate stormwater. Infiltration basins use the natural filtering ability of the soil to remove pollutants in stormwater runoff.

Jobs/housing balance The ratio between the number of housing units and the number of full-time jobs in an identified geographic area. The ratio is calculated by dividing the number of full-time jobs by the number of housing units.



DEFINITIONS

13-2

Lake Perris State Recreation Area A 6,675-acre state-owned recreation area including Lake Perris located southerly of the City of Moreno Valley.

Logistics The management of the flow of resources between a point of origin and a point of destination including the importation, warehousing, consolidation, repackaging and shipping of goods and materials.

Luminaire A light fixture generally affixed to a pole used in exterior areas to illuminate streets, driveways, walkways, and parking areas.

Medium trucks Trucks having three axles

Multi-Use Trails A planned city-wide system of trails that accommodate pedestrian, equestrian and bicycle users. See the Parks, Recreation and Open Space Element of the City's General Plan

Native landscape The use of plant materials found to grow naturally in an area that are adapted to a particular environment and are able to live on natural rainfall, thereby reducing the need for mechanical irrigation

Off-project Refers to areas outside of the World Logistics Center. Generally applies to infrastructure improvements needed to implement the WLC project that will extend beyond the WLC boundary.

Off-site Refers to those portions of the property that are not within building sites, including common areas, open space, public areas, streetscapes, etc.

On-site Refers to individual building sites within the World Logistics Center

San Jacinto Wildlife Area (SJWA) A 9,000-acre area owned and managed by the California Department of Fish and Wildlife open to the public. Approximately 1,100 acres of the northerly portion of the SJWA is within the City of Moreno Valley.

Specific Plan Refers to the World Logistics Center Specific Plan which covers 2,610 acres of land in eastern Moreno Valley and functions as the land use regulations for the development of a master planned logistics campus.

Subdivision Map Act The body of law (Government Code Section 66410-66499.58) that regulates the subdivision of land in California.

Truck Routes/Truck Route Ordinance Streets that have been officially designated by for use by vehicles with a gross vehicle weight of three tons or more. See Chapter 12.36 of the Municipal Code.

World Logistics Center The project name for the development to be established under the World Logistics Center Specific Plan



DEFINITIONS

13-3

EXHIBITS

Enlargements of Exhibits contained within the Specific Plan

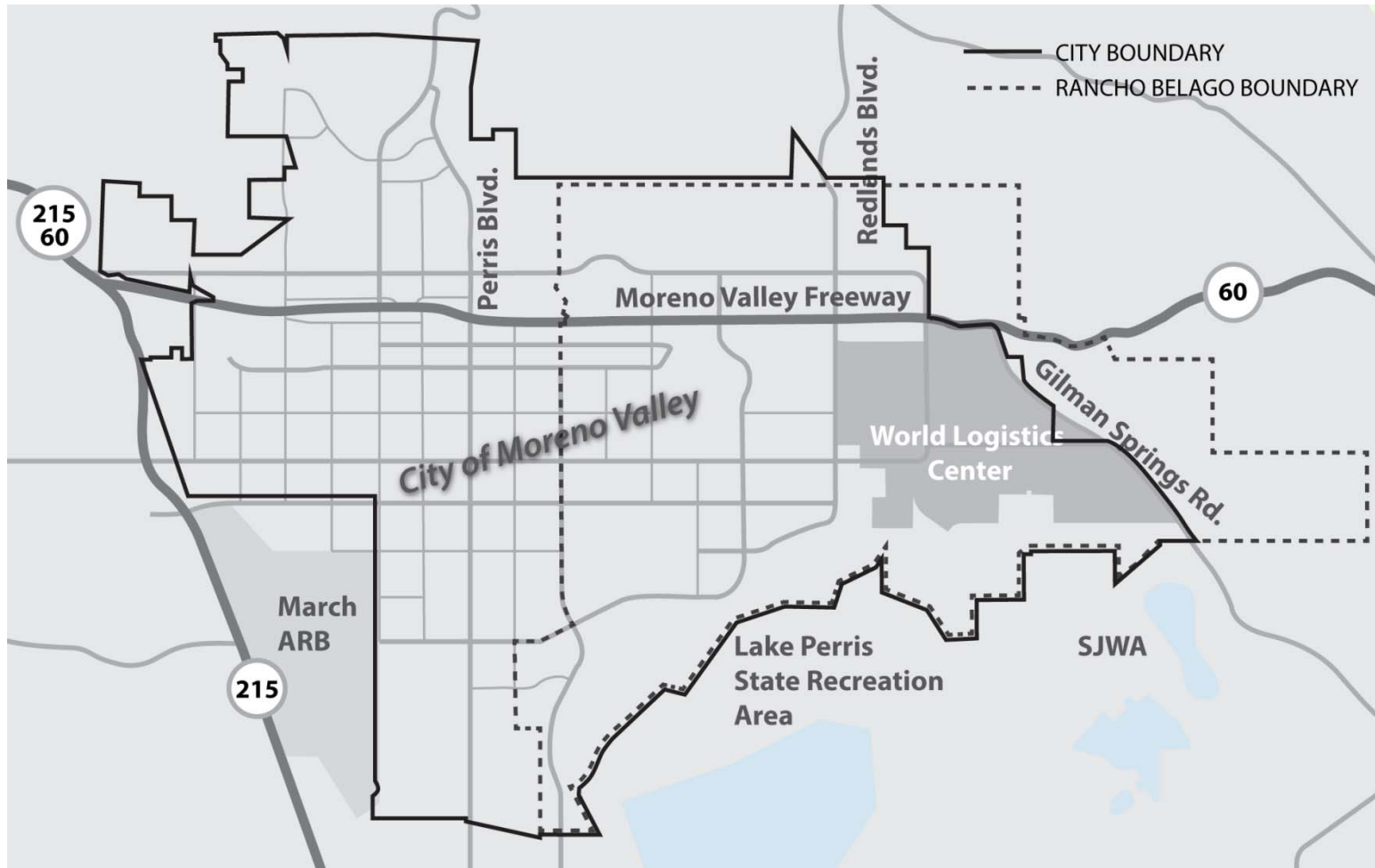


WORLD
LOGISTICS
CENTER®

EXHIBITS

E-1

Exhibit 1-1 Moreno Valley Regional Map (pg.1-1)



EXHIBITS

E-2

Exhibit 1-2 Specific Plan Area (pg.1-3)

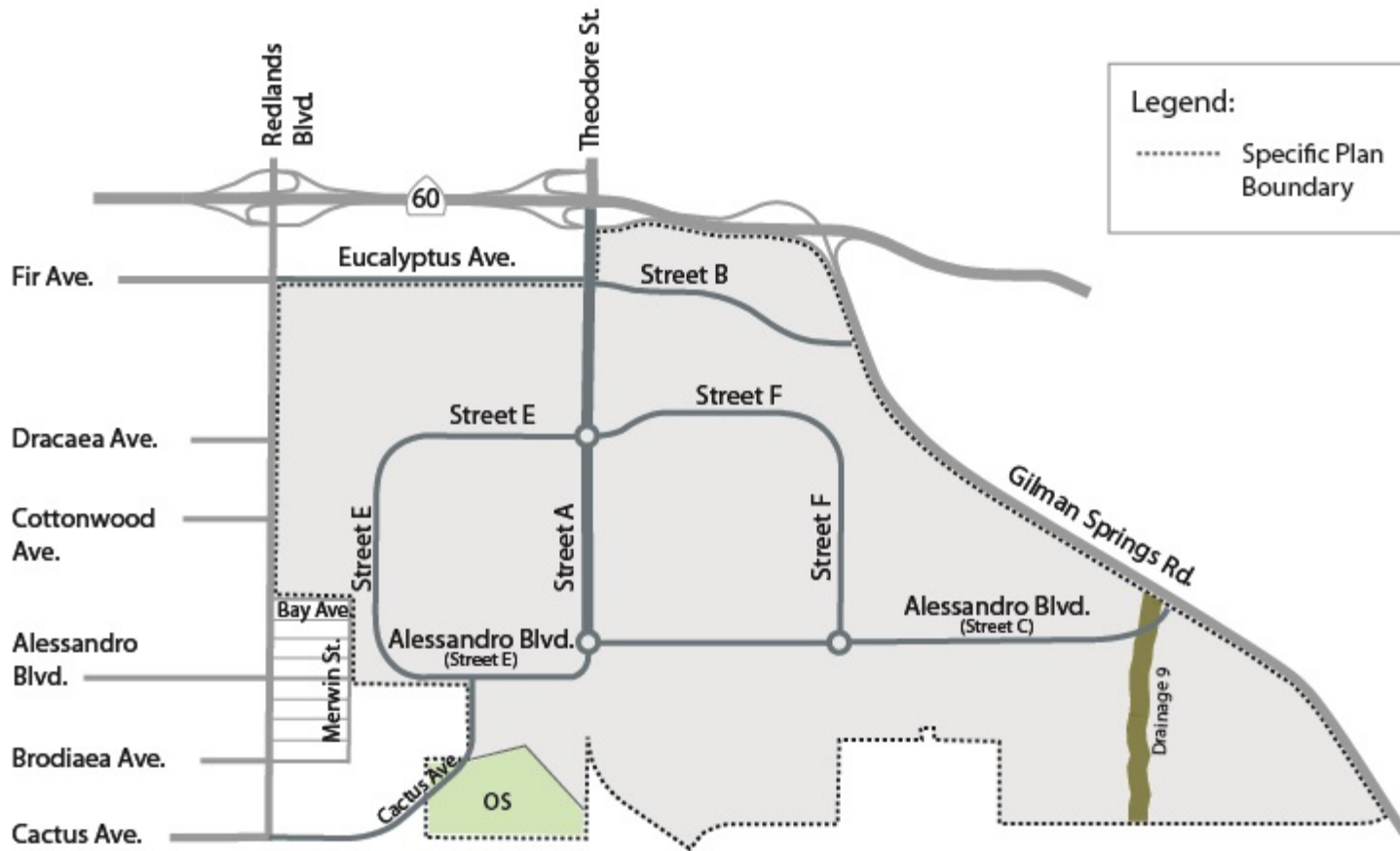
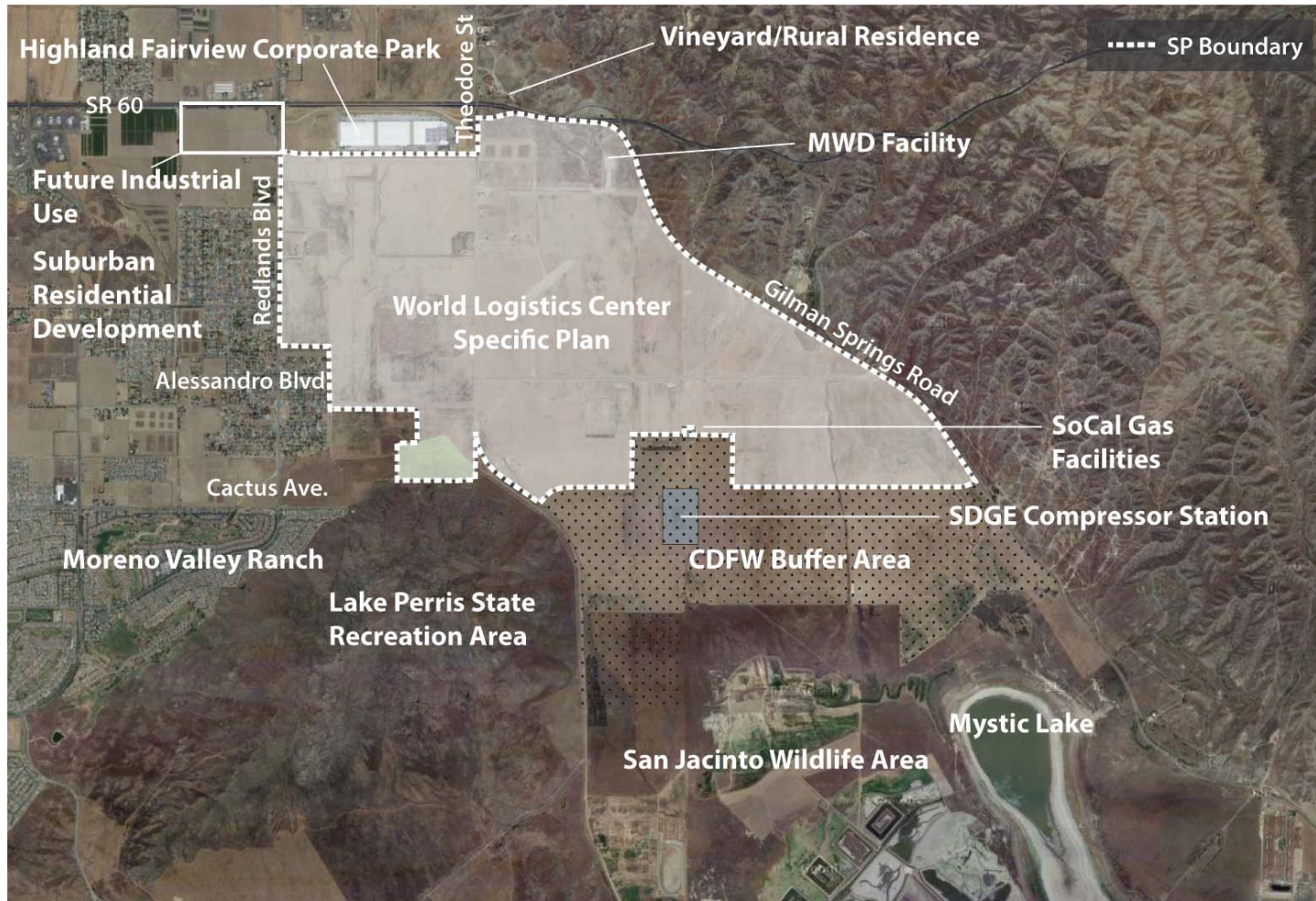


Exhibit 1-3 Surrounding Land Uses (pg.1-6)



EXHIBITS

E-4

Exhibit 1-4 Existing Fault Zones (pg.1-7)

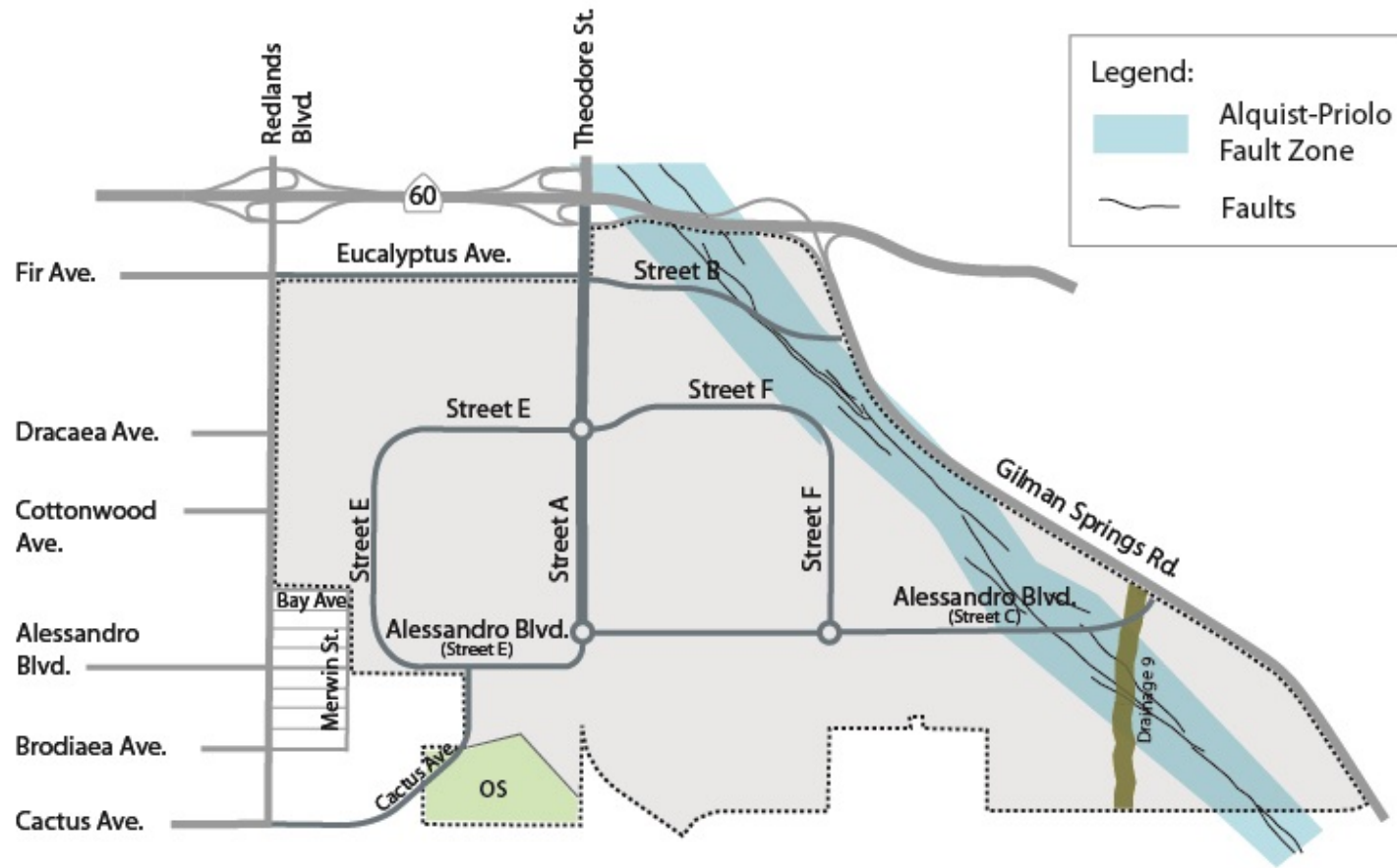


Exhibit 2-1 Land Use Plan (pg.2-2)



Planning Area (PA)	Land Use	Area	Building SF
Logistics Development			
1	LD	77.8	1,100,000
2	LD	193.5	4,200,000
3	LD	120.3	1,600,000
4	LD	301.5	5,600,000
5	LD	64.2	1,100,000
6	LD	115.3	500,000
7	LD	10.3	50,000
8	LD	142.9	2,150,000
9	LD	485.8	10,400,000
10	LD	139.9	2,200,000
11	LD	500	8,000,000
12	LD	231.3	3,500,000
		2,382.8	40,400,000
Light Logistics			
20	LL	16.1	45,500
21	LL	10.5	77,250
22	LL	10.5	77,250
		37.1	200,000
Open Space			
30	OS	74.3	
		74.3	
Right of Way			
ROW		115.8	
		115.8	
Grand Total		2,610.0	40,600,000



Exhibit 2-2 Fire Station Site (pg.2-6)



Exhibit 2-3 Special Edge Treatment Areas Map (pg.2-13)



Exhibit 3-1 Circulation Plan (pg.3-1)

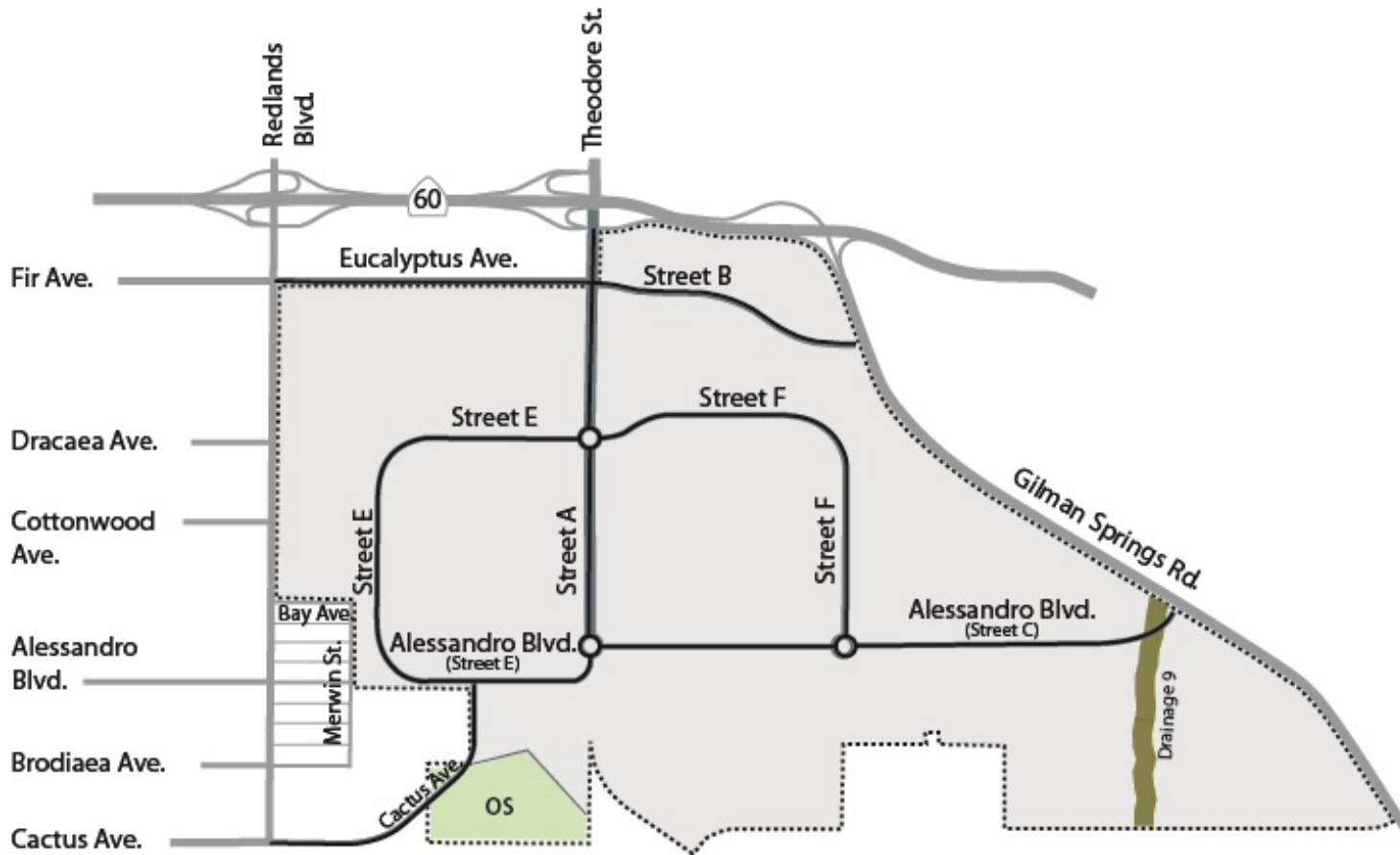


Exhibit 3-2 Project Entries (pg.3-2)

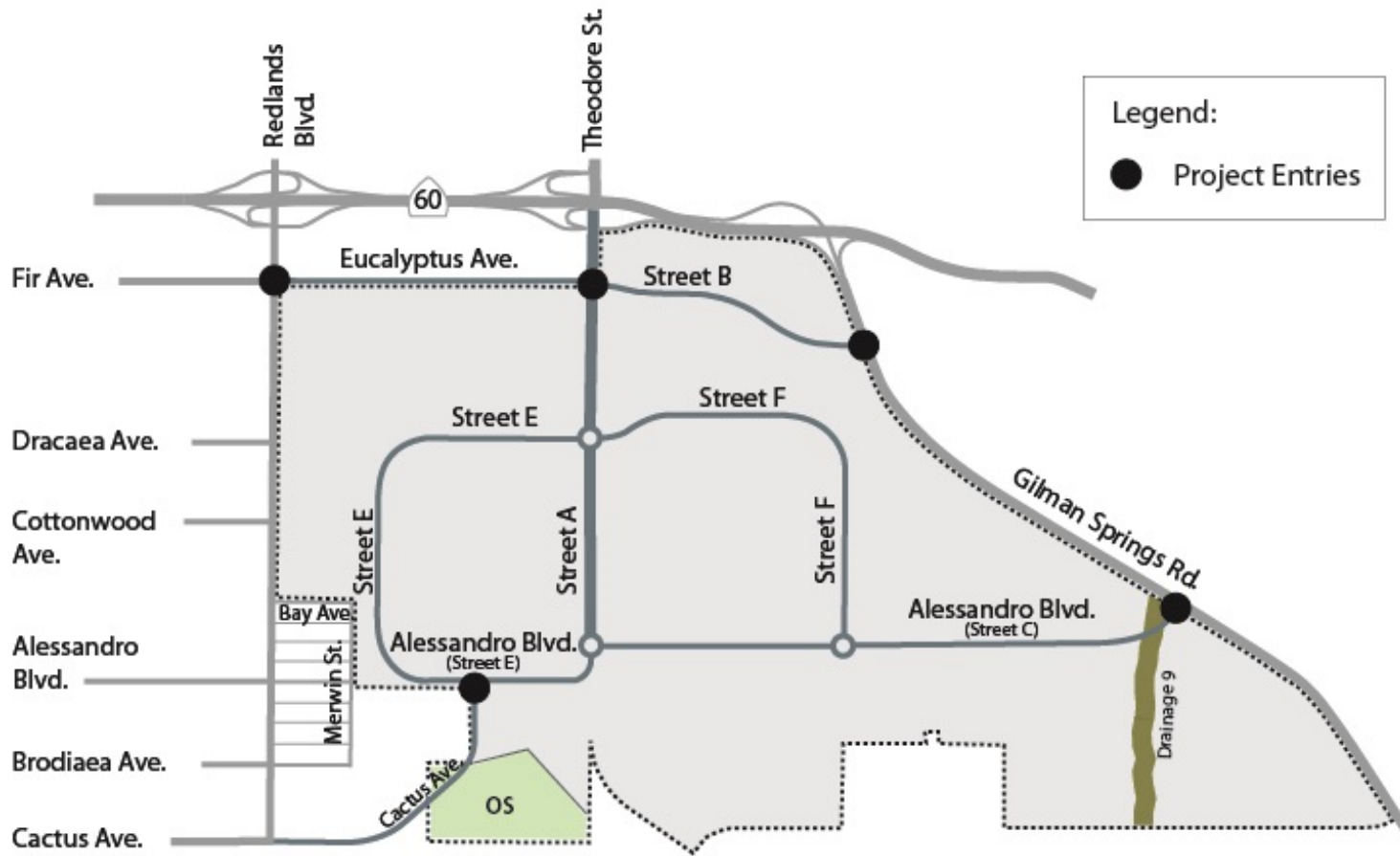


Exhibit 3-3 Street Configurations (pg.3-3)

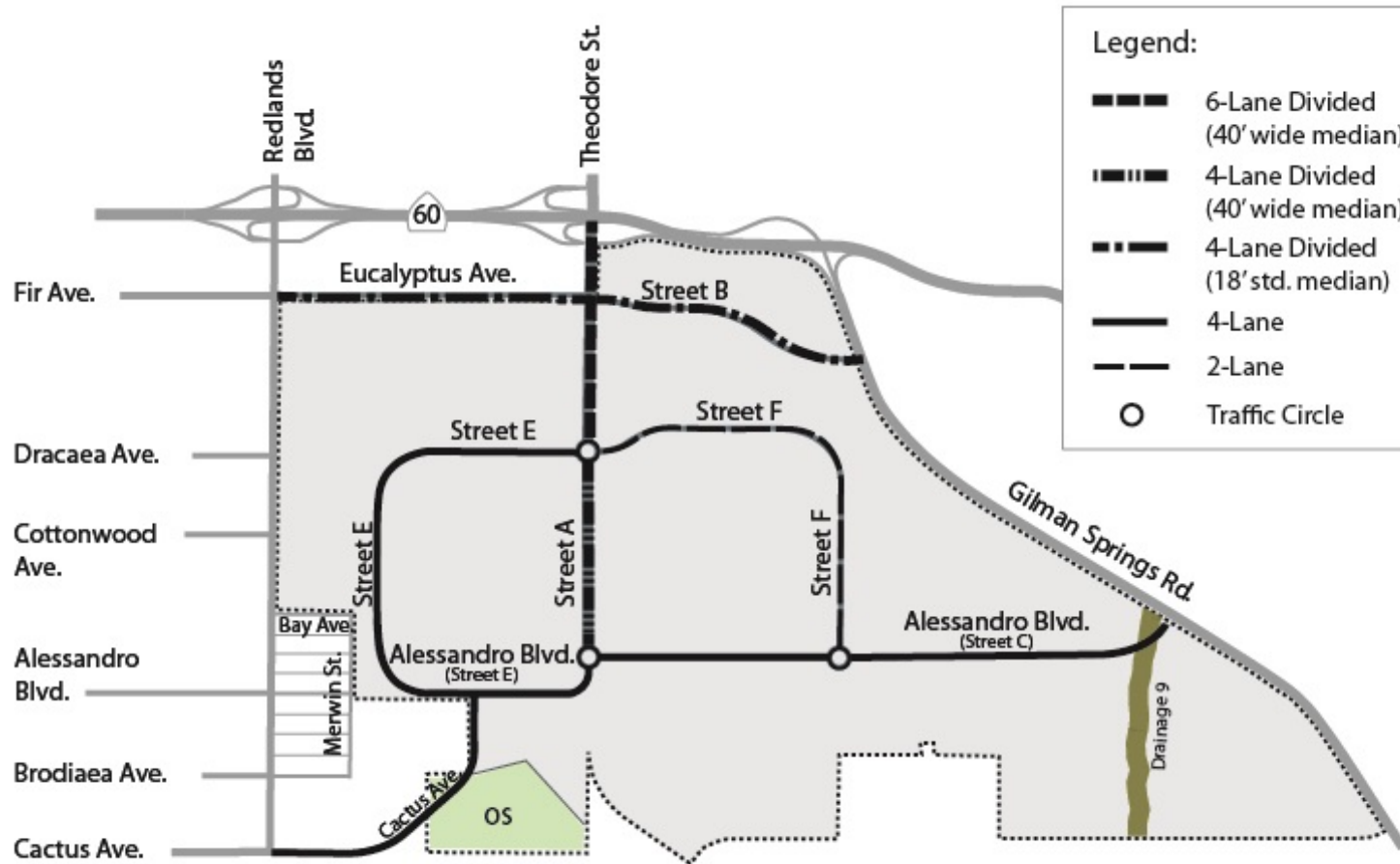


Exhibit 3-4a Street "A" (Theodore Street) North of Street "E" (pg.3-4)

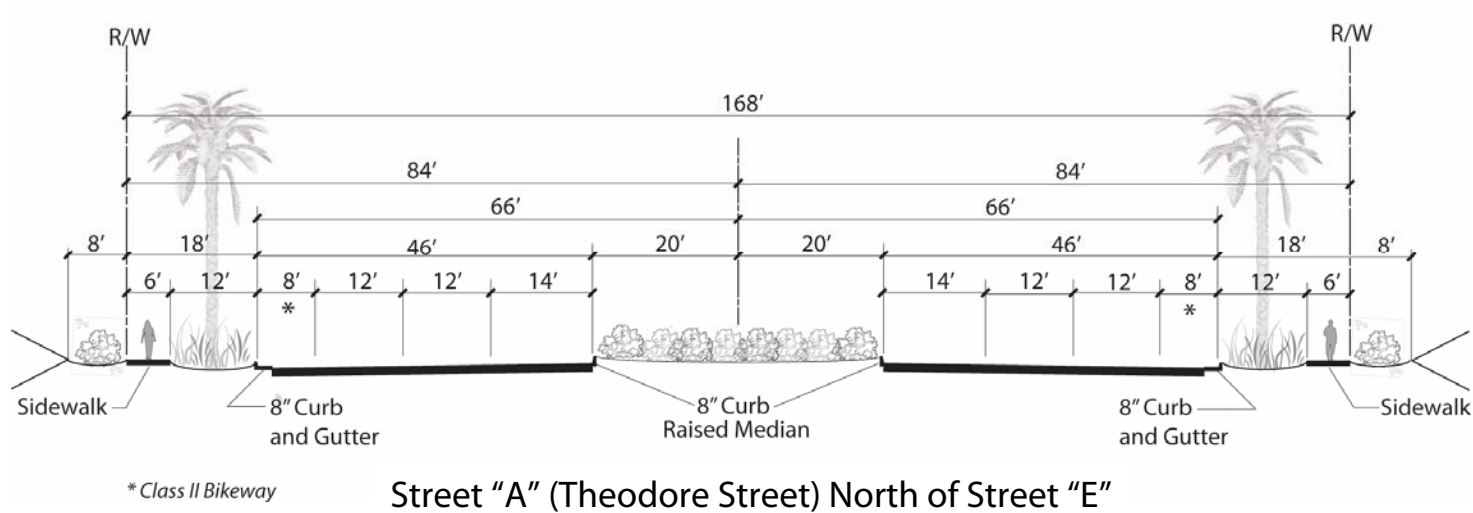
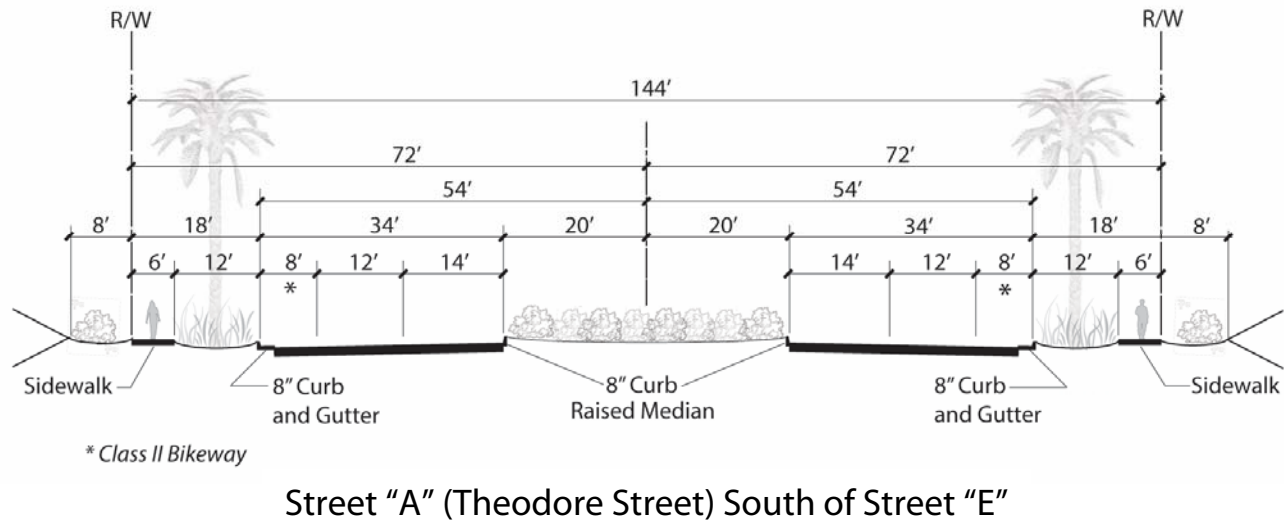


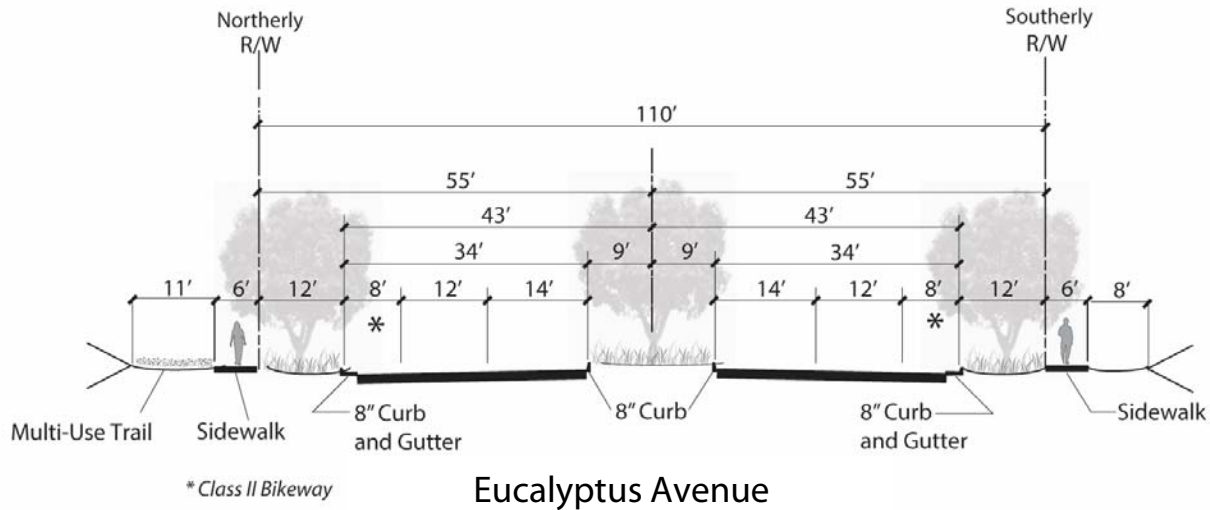
Exhibit 3-4b Street "A" (Theodore Street) South of Street "E" (pg.3-4)



EXHIBITS

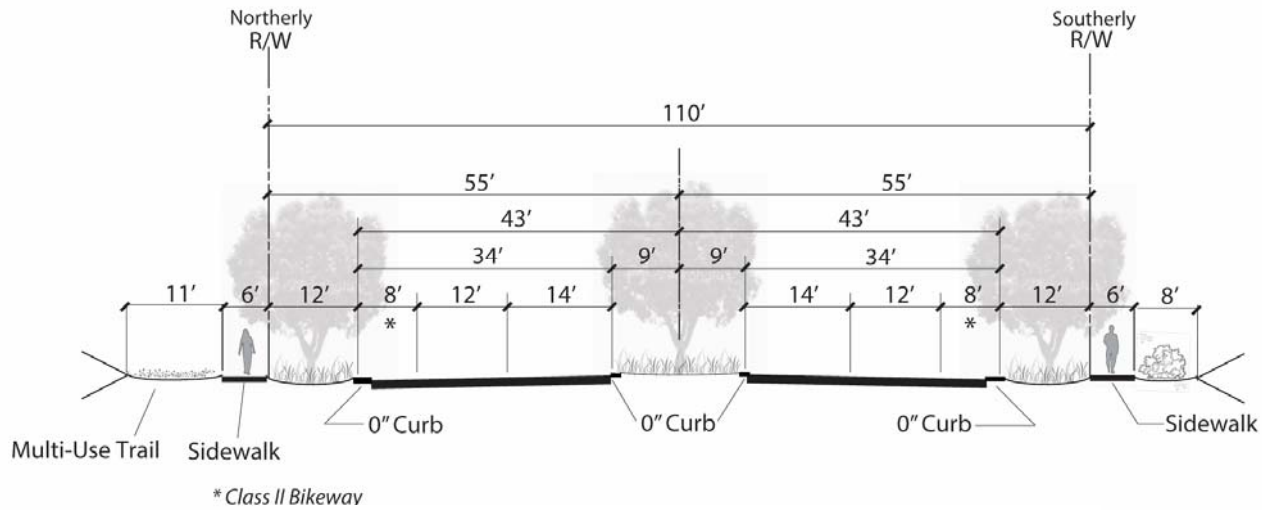
E-12

Exhibit 3-5 Eucalyptus Avenue (pg.3-5)



Eucalyptus Avenue

Exhibit 3-6 Street "B" (Eucalyptus Avenue Extension) (pg.3-5)



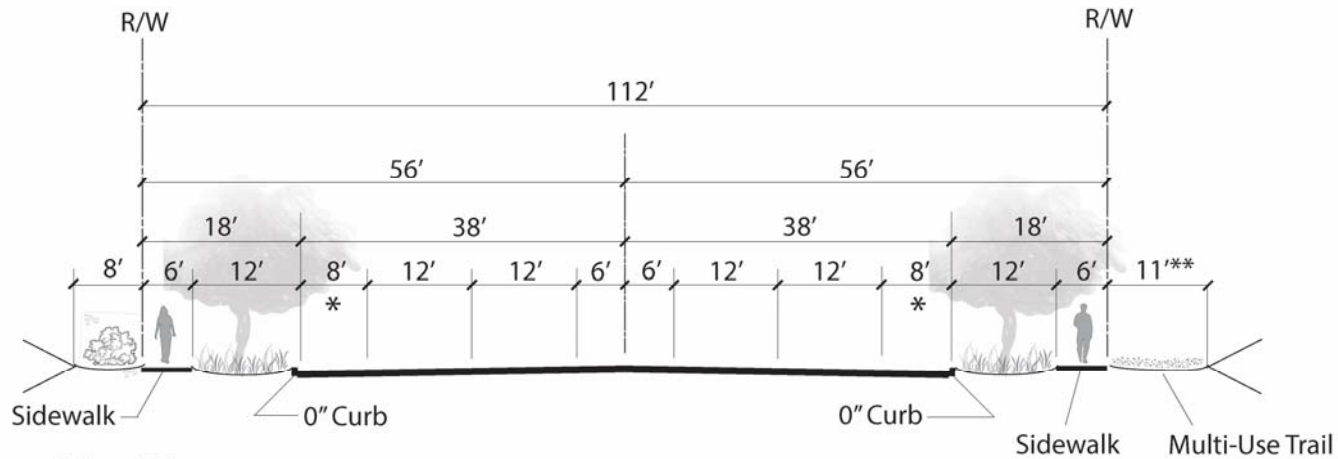
Street "B" (Eucalyptus Avenue Extension)



EXHIBITS

E-13

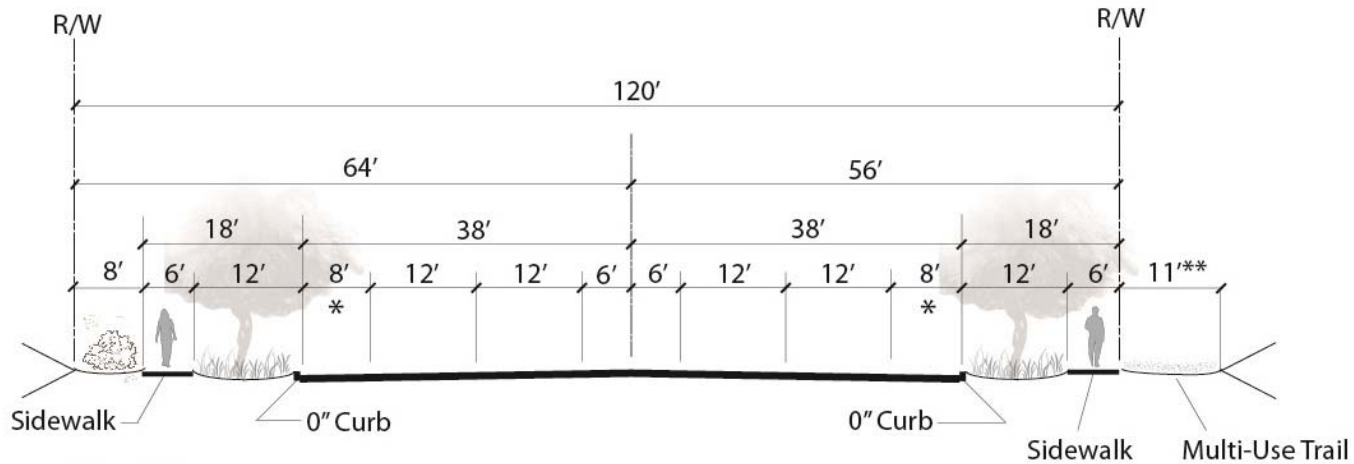
Exhibit 3-7 Street "E" (pg.3-6)



* Class II Bikeway
 ** 11' with trail section, 8' without trail

Street "E"

Exhibit 3-8 Alessandro Boulevard (pg 3-6)



* Class II Bikeway
 ** 11' with trail section, 8' without trail

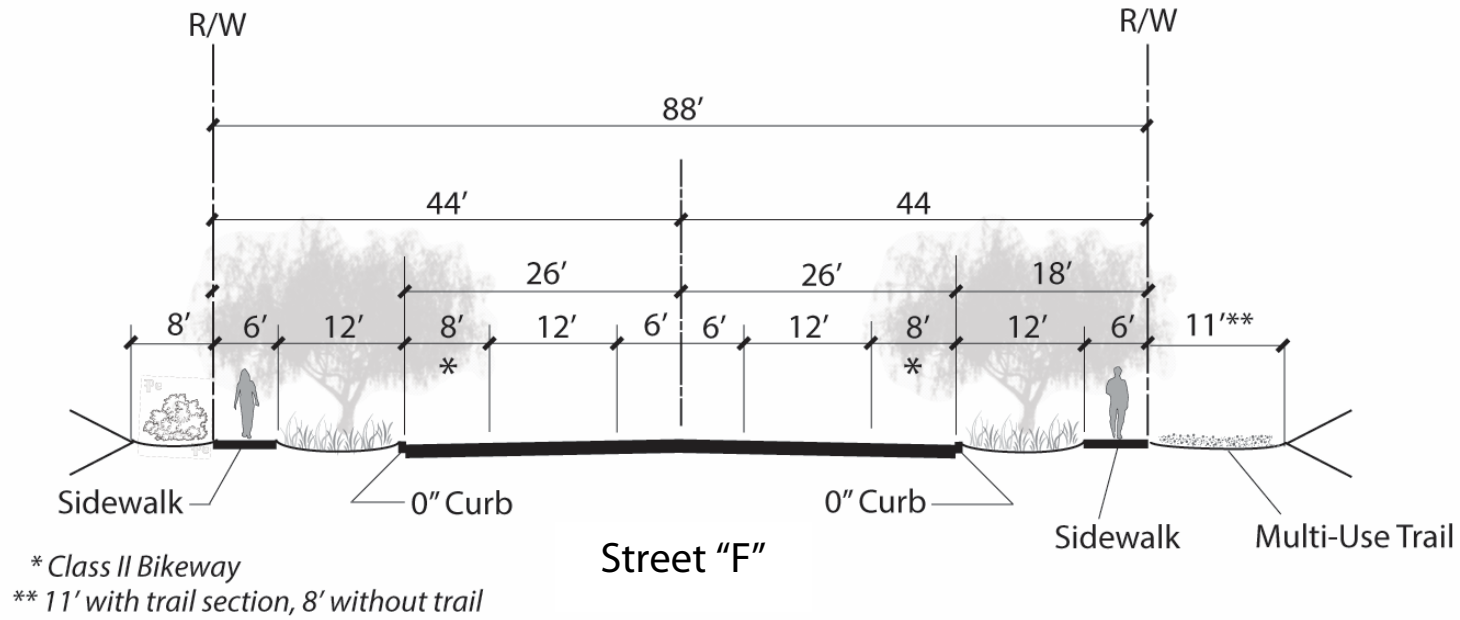
Alessandro Boulevard

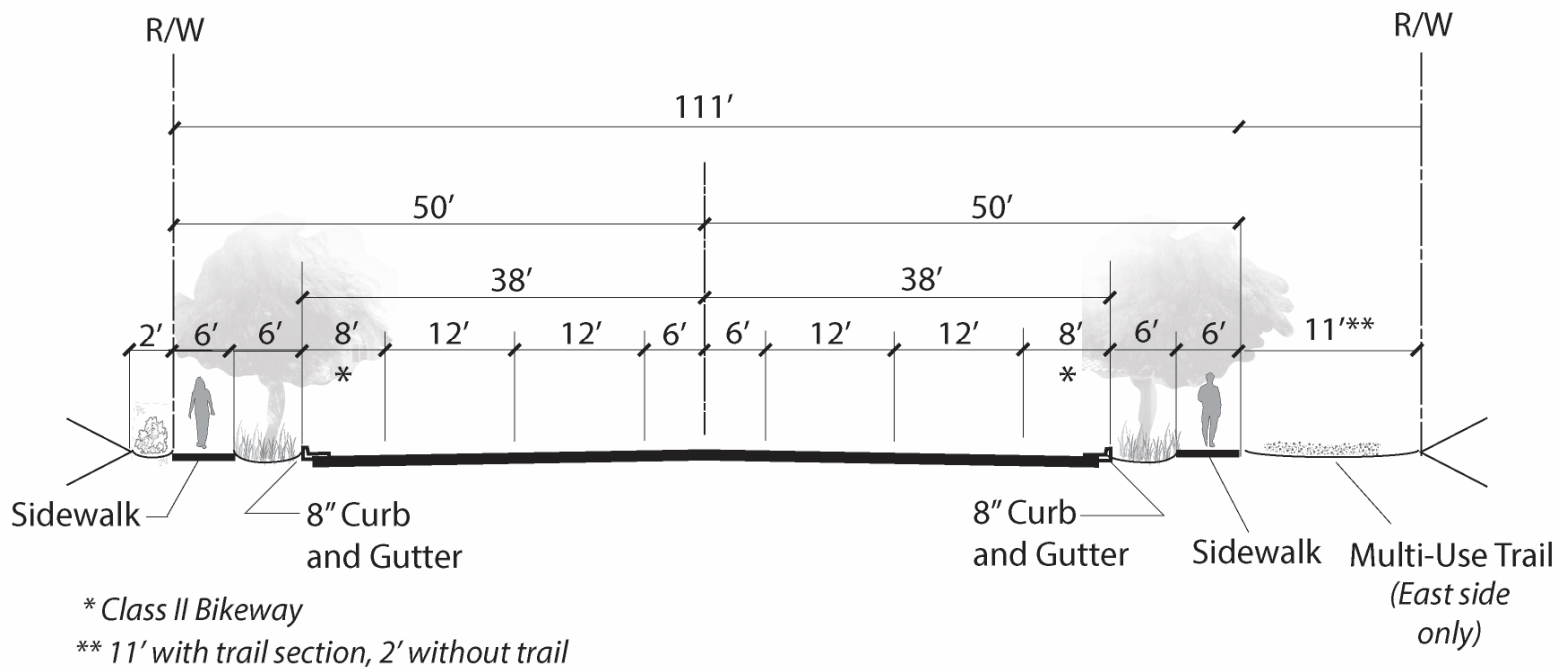


EXHIBITS

E-14

Exhibit 3-9 Street "F" (pg.3-7)





Cactus Avenue (Extension)



Exhibit 3-11 Truck Routes (pg.3-8)

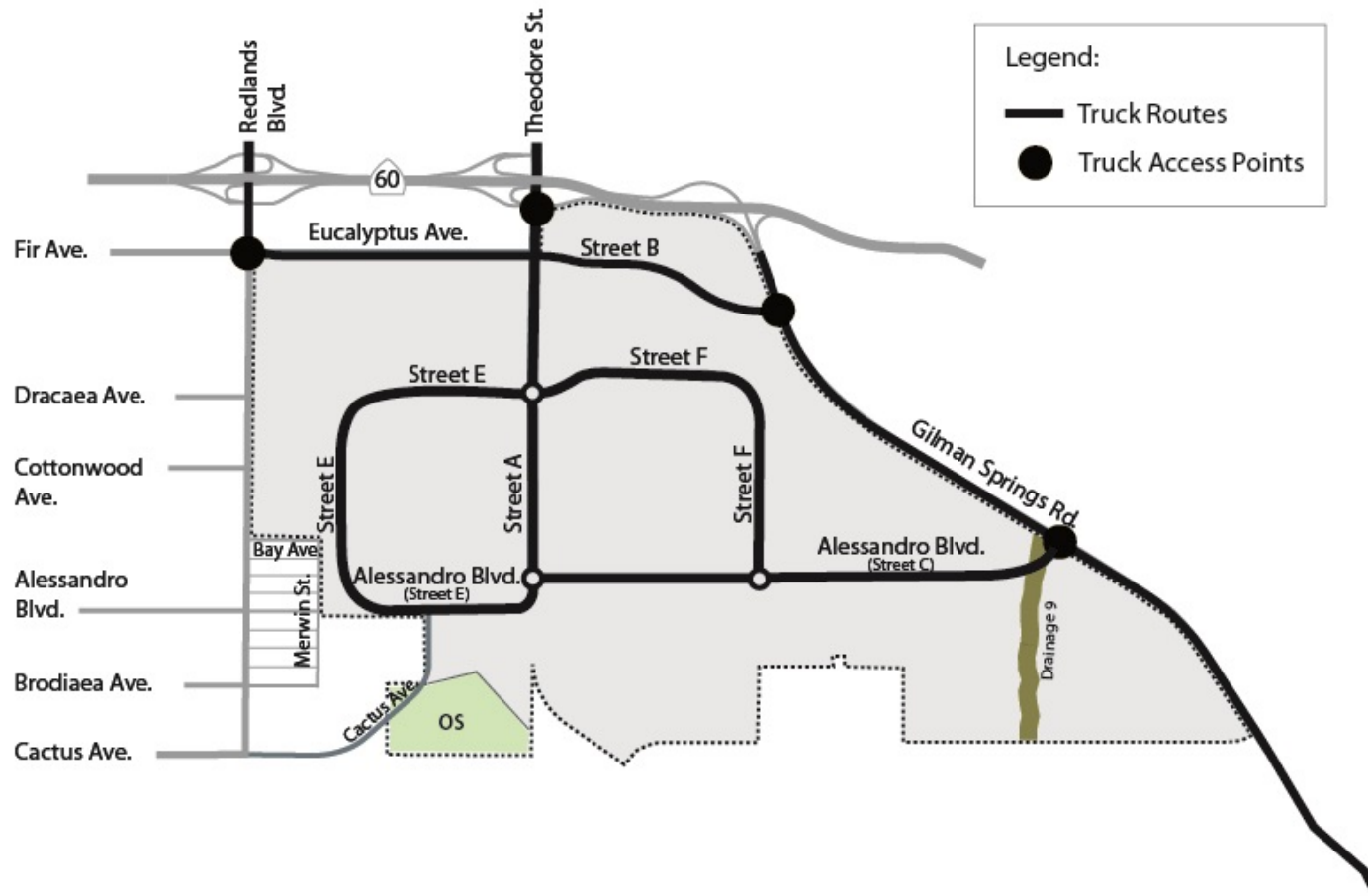


Exhibit 3-12 Roundabout Diagram (pg.3-9)

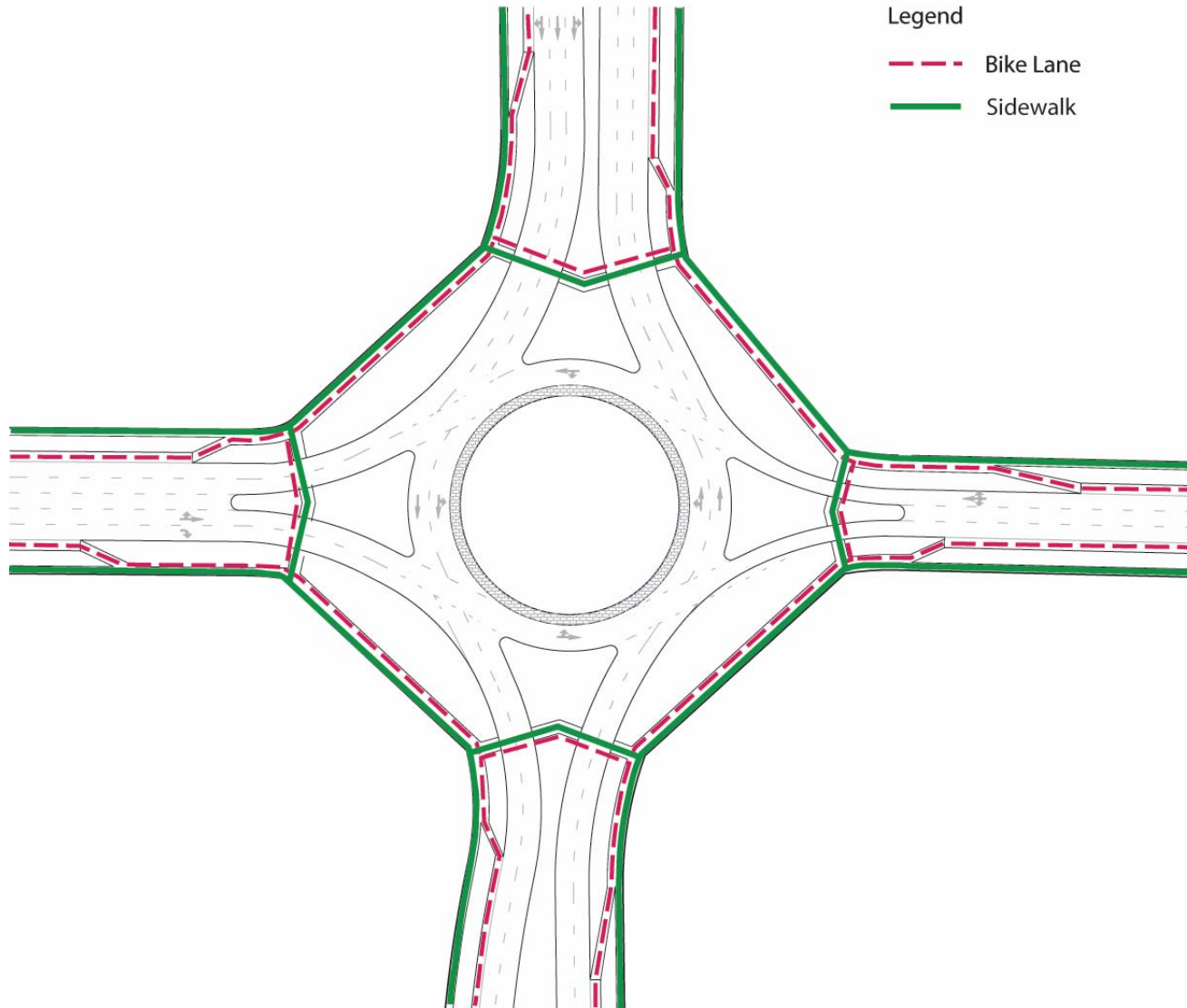


Exhibit 3-13 Truck Pullout Diagram (pg.3-10)

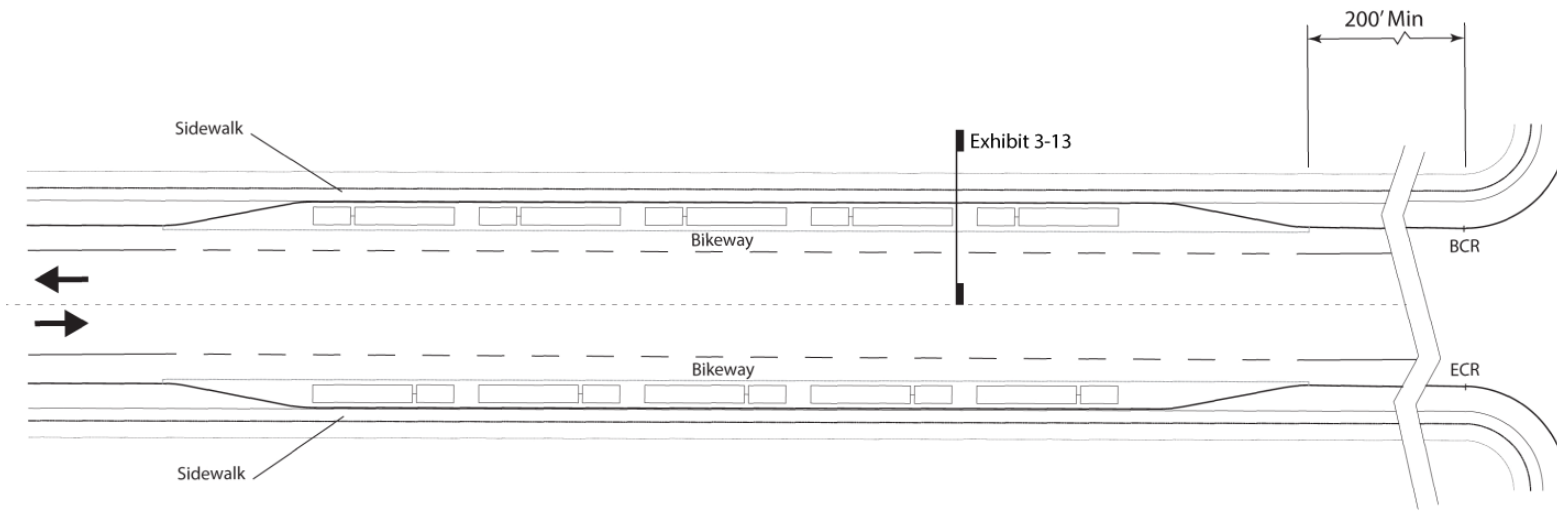


Exhibit 3-14 Truck Parking Lane Section (pg.3-10)

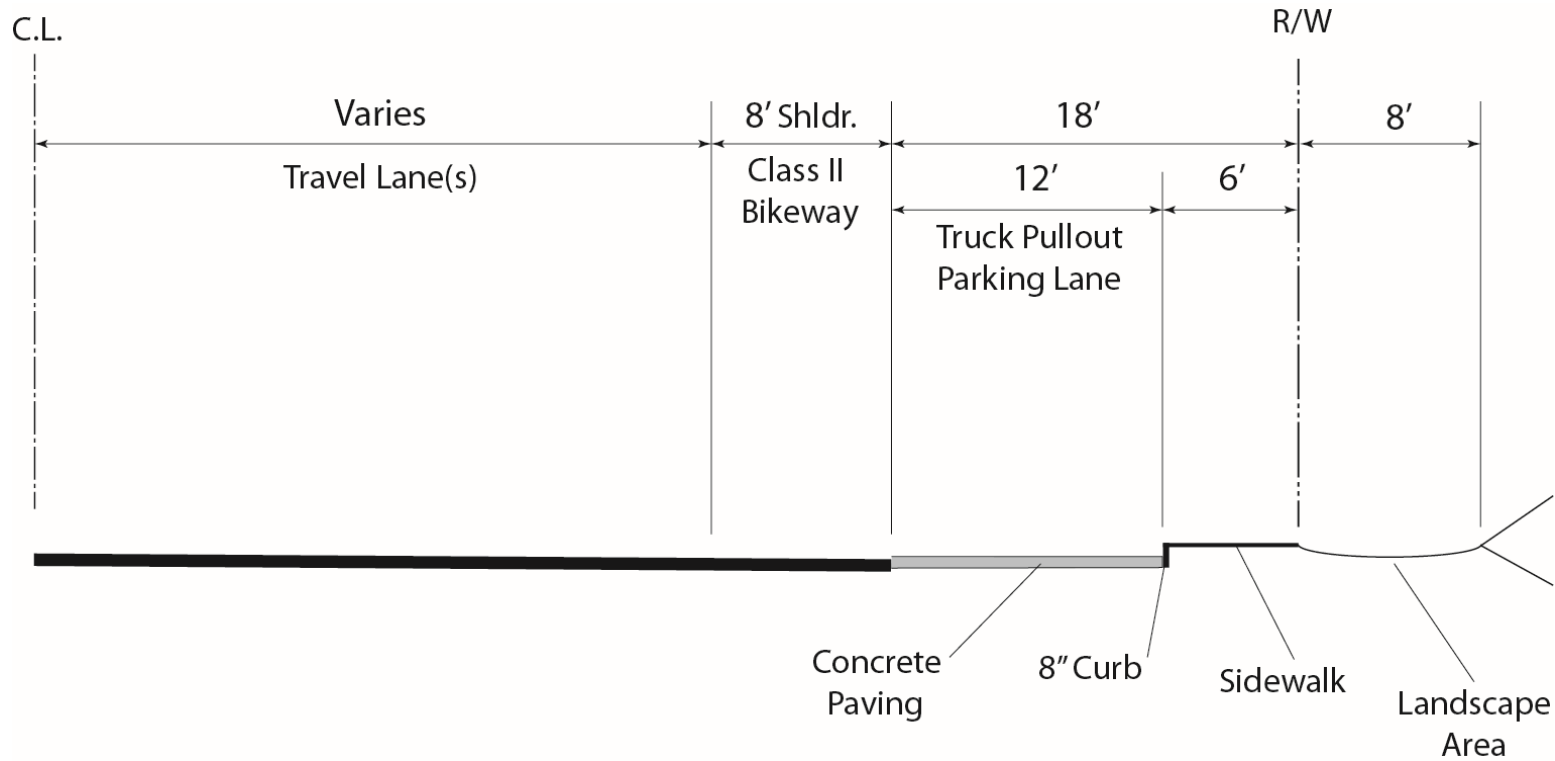


Exhibit 3-15 Potential Bus Route (pg.3-11)

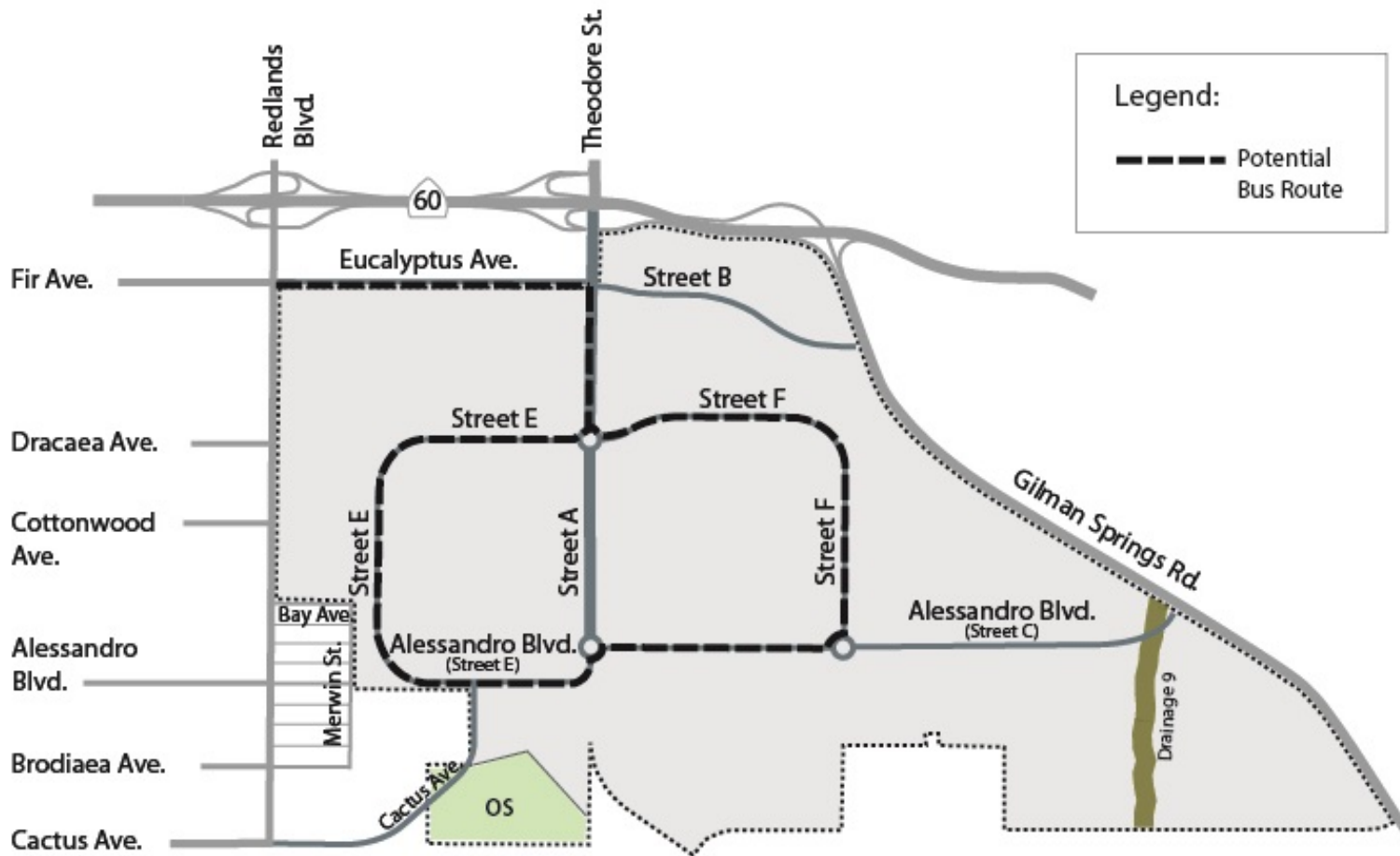


Exhibit 3-16 Emergency Access (Conceptual) (pg.3-12)

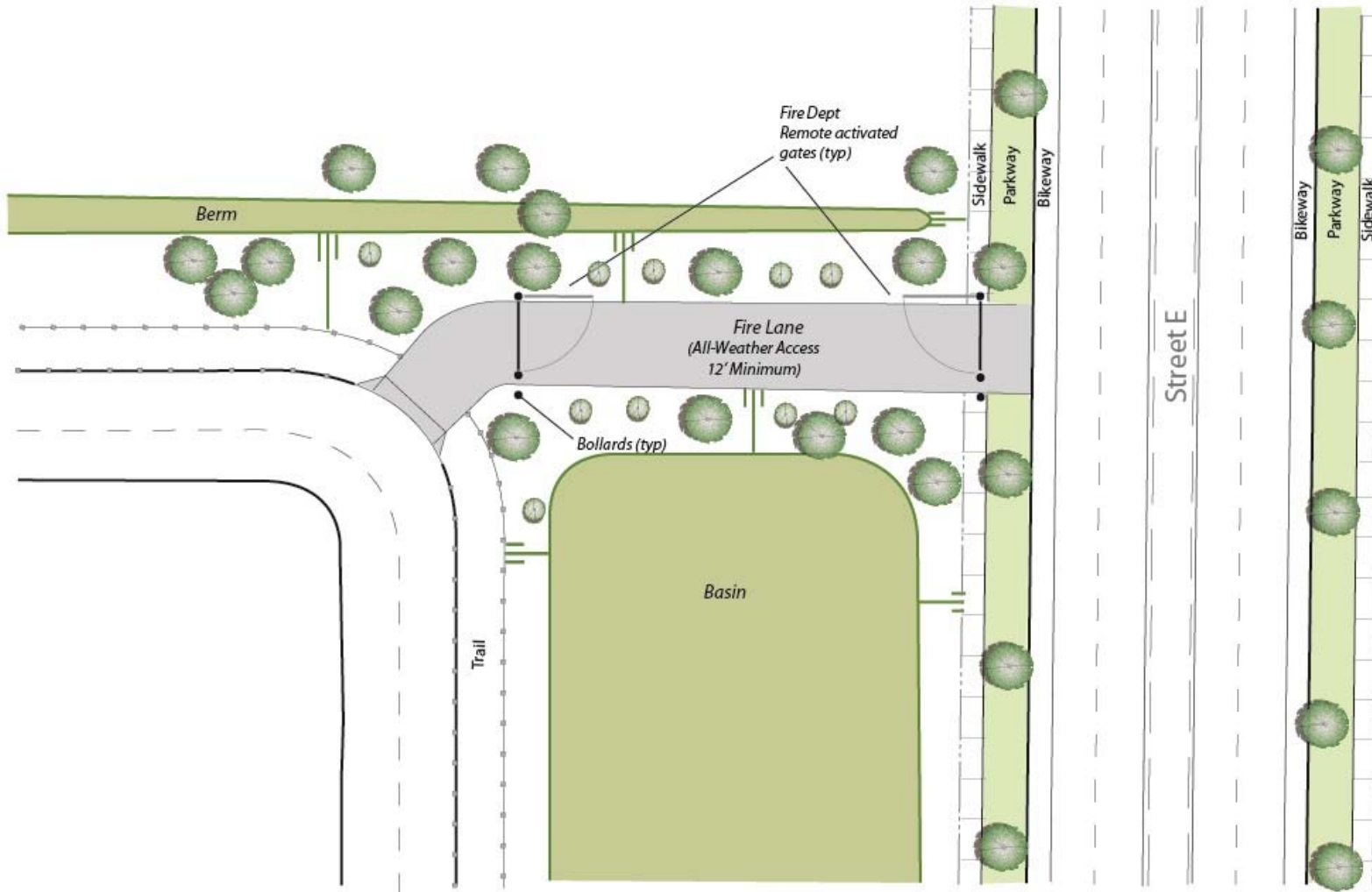


Exhibit 3-17 Multi-Use Trail Plan (pg.3-13)

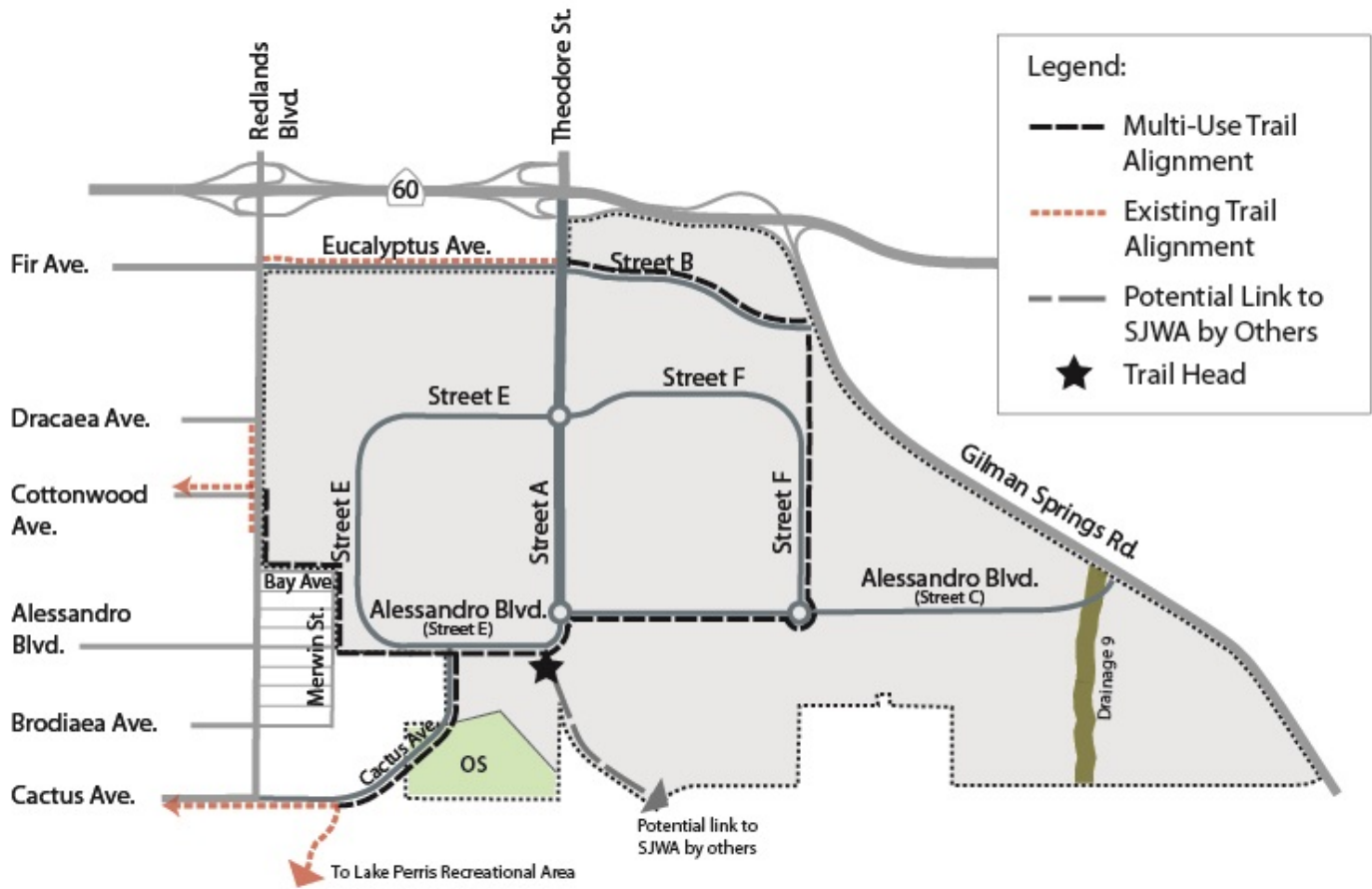


Exhibit 3-18 Bicycle Circulation Plan (pg.3-14)

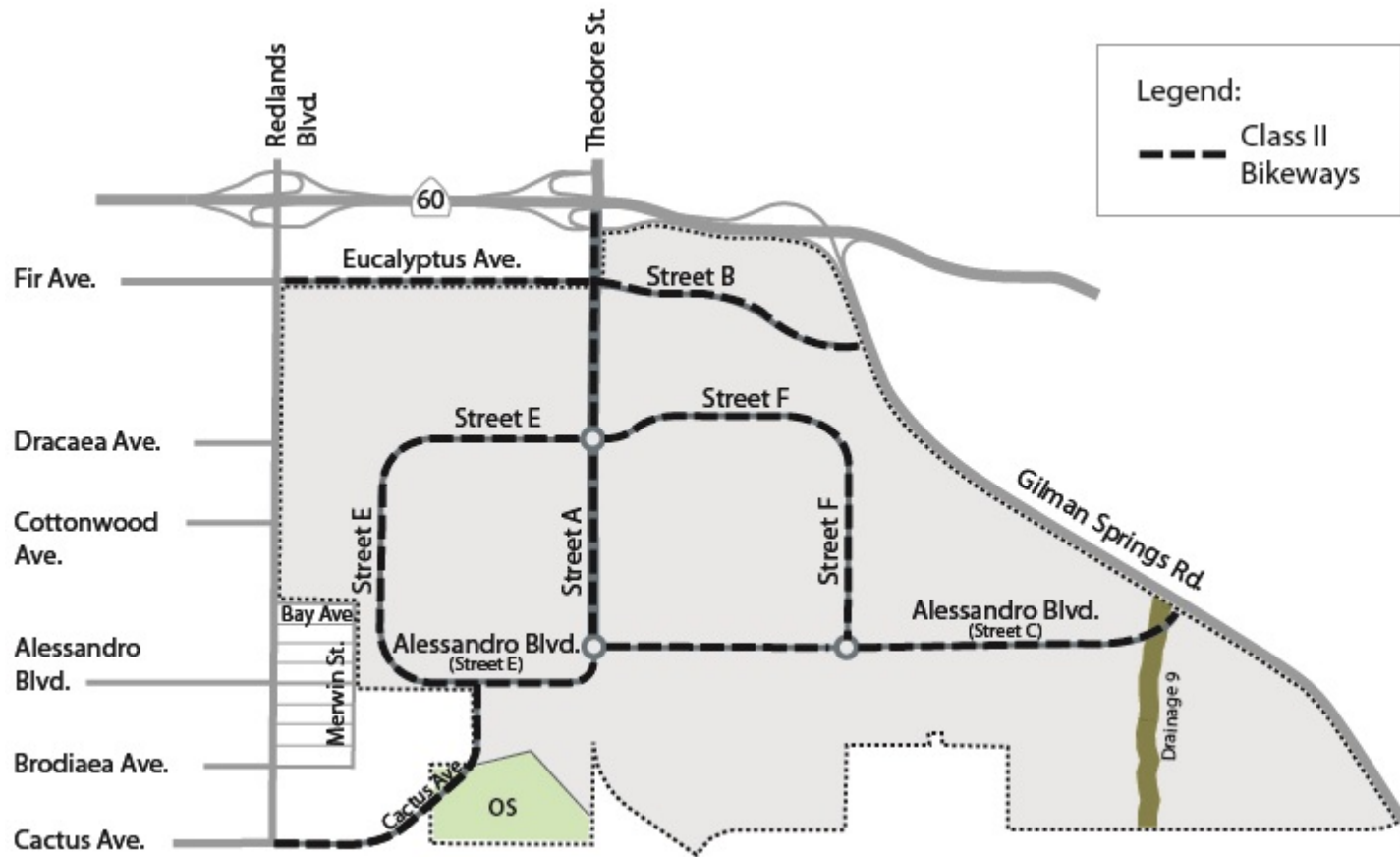


Exhibit 3-19 Water Facilities Master Plan (pg.3-15)

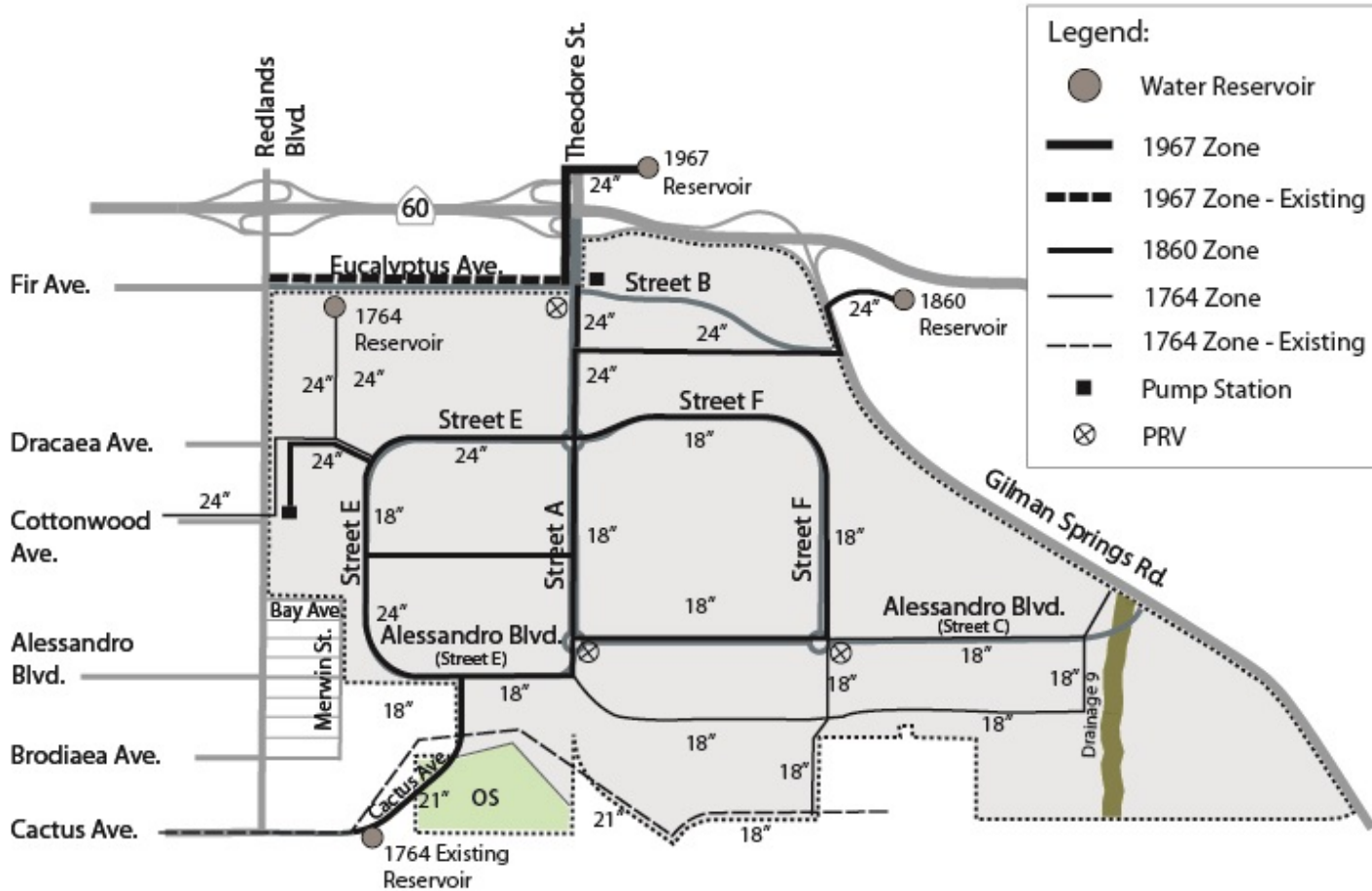
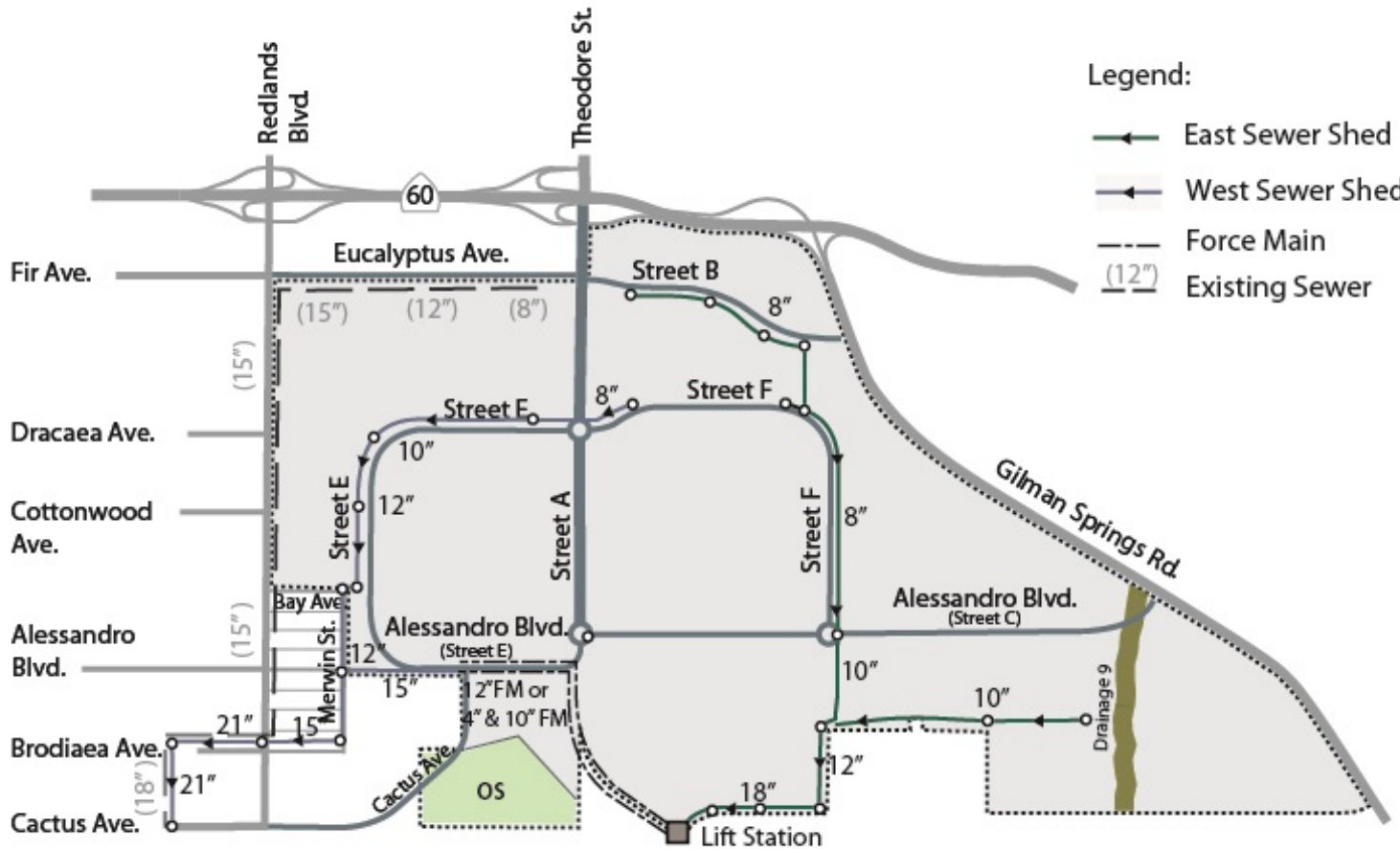


Exhibit 3-20 Wastewater Service Plan (pg.3-17)



- Legend:
- East Sewer Shed
 - ←— West Sewer Shed
 - - - Force Main
 - (12") Existing Sewer



Exhibit 3-21 Recycled Water Plan (pg.3-18)

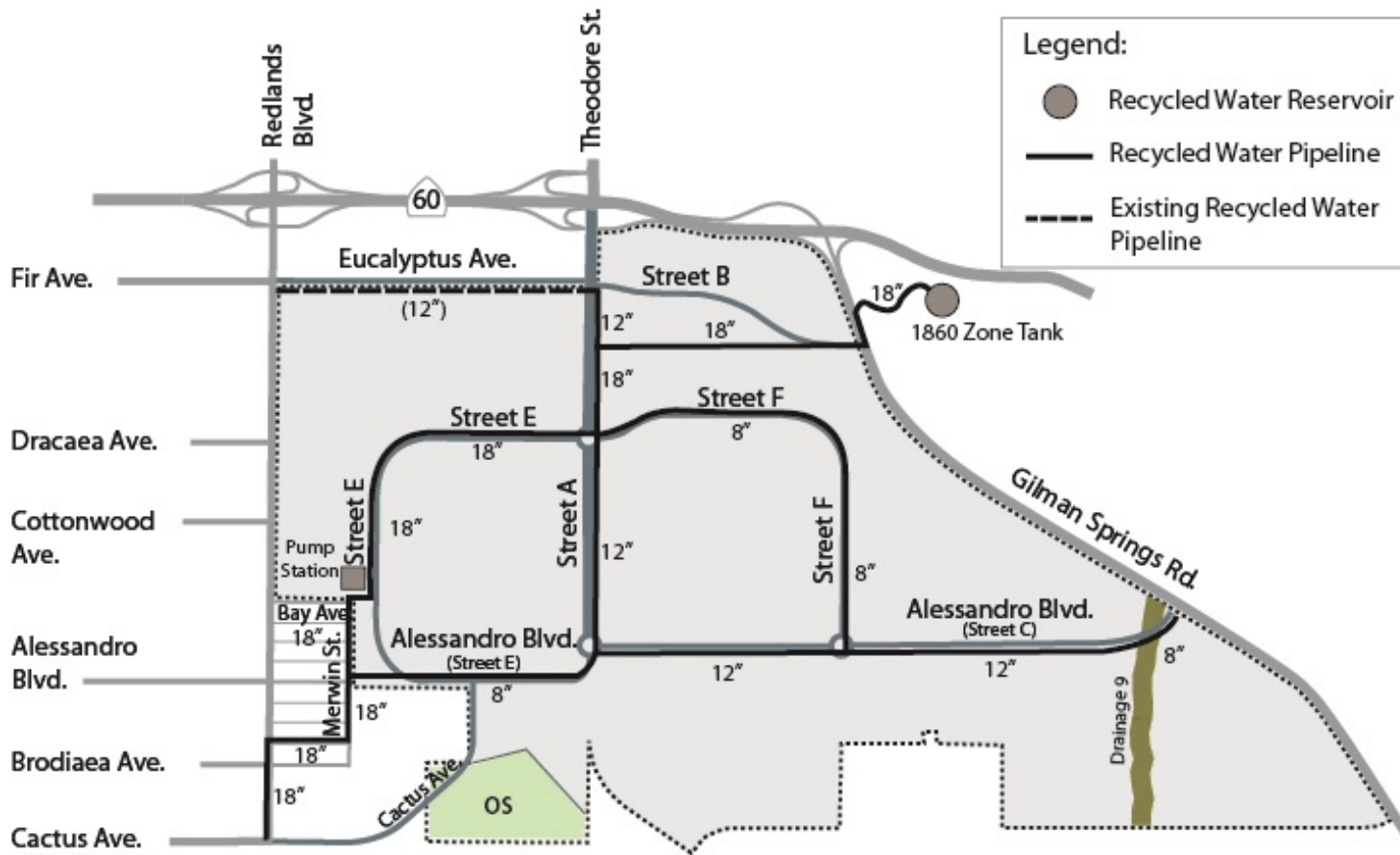


Exhibit 3-22 Storm Drain Plan (pg.3-19)

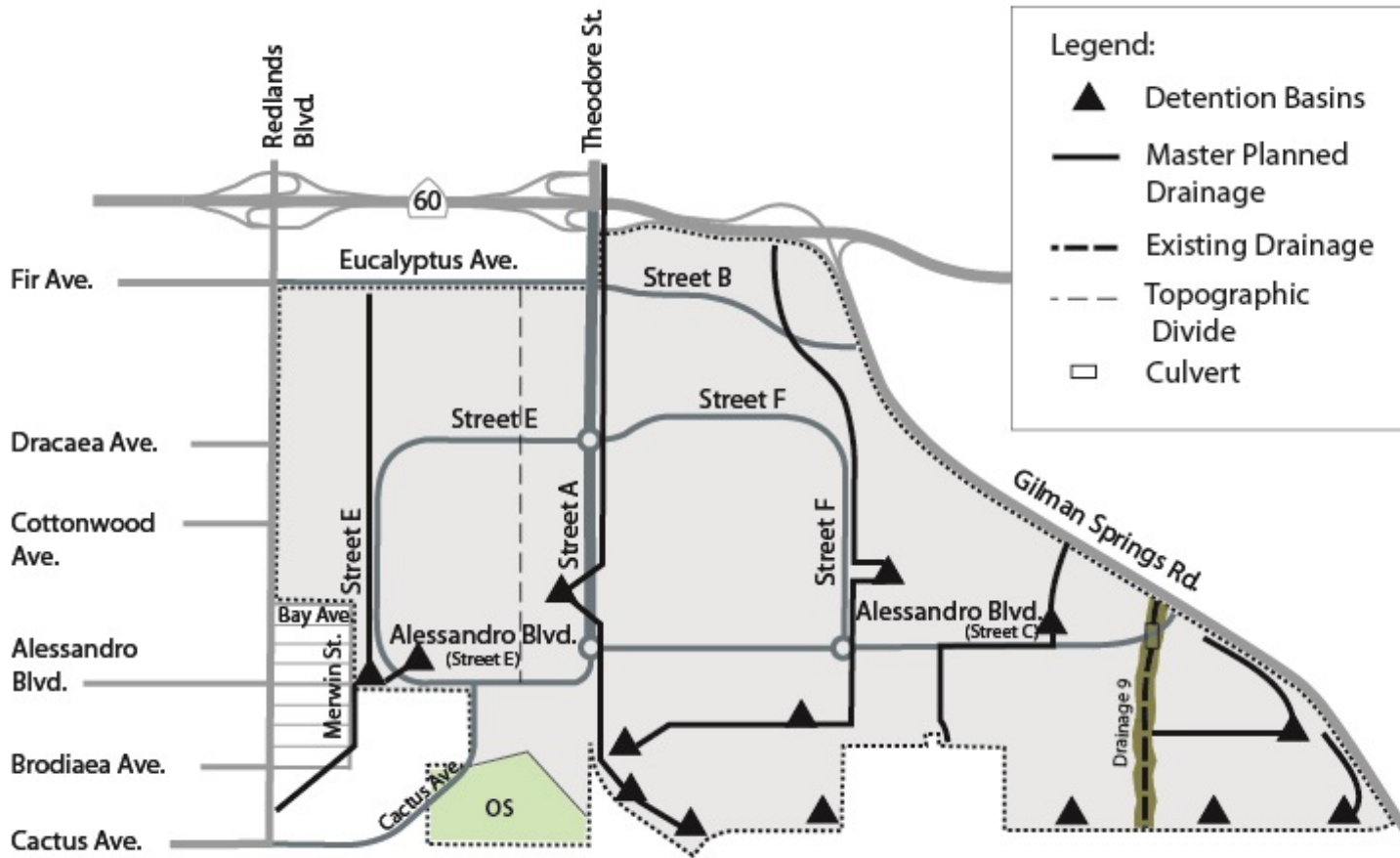


Exhibit 3-23 Electrical Utility Plan (pg.3-21)

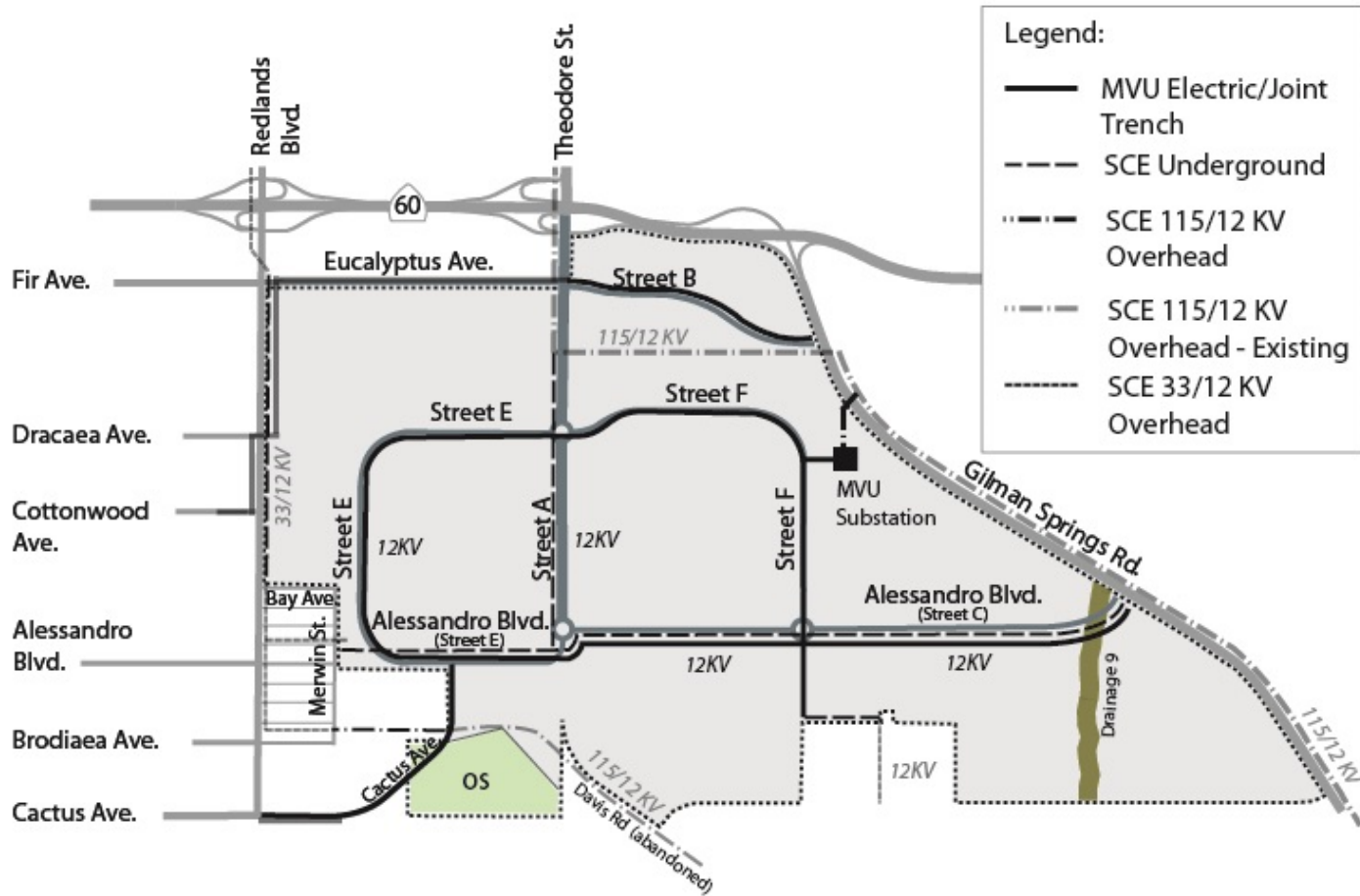
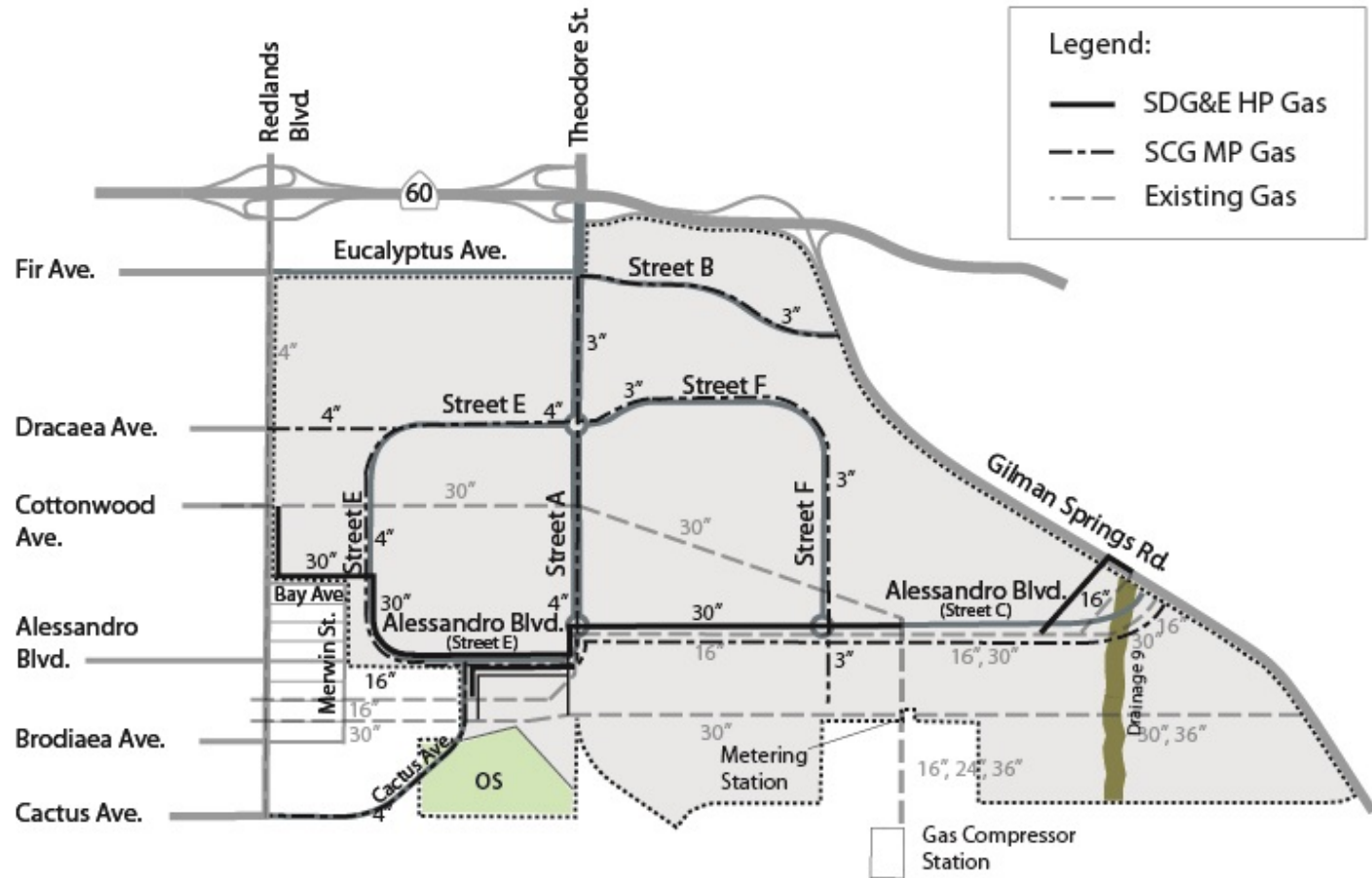


Exhibit 3-24 Gas Utility Plan (pg.3-23)



EXHIBITS

E-30

Exhibit 4-1 Special Edge Treatment Areas Design Criteria (pg.4-6)

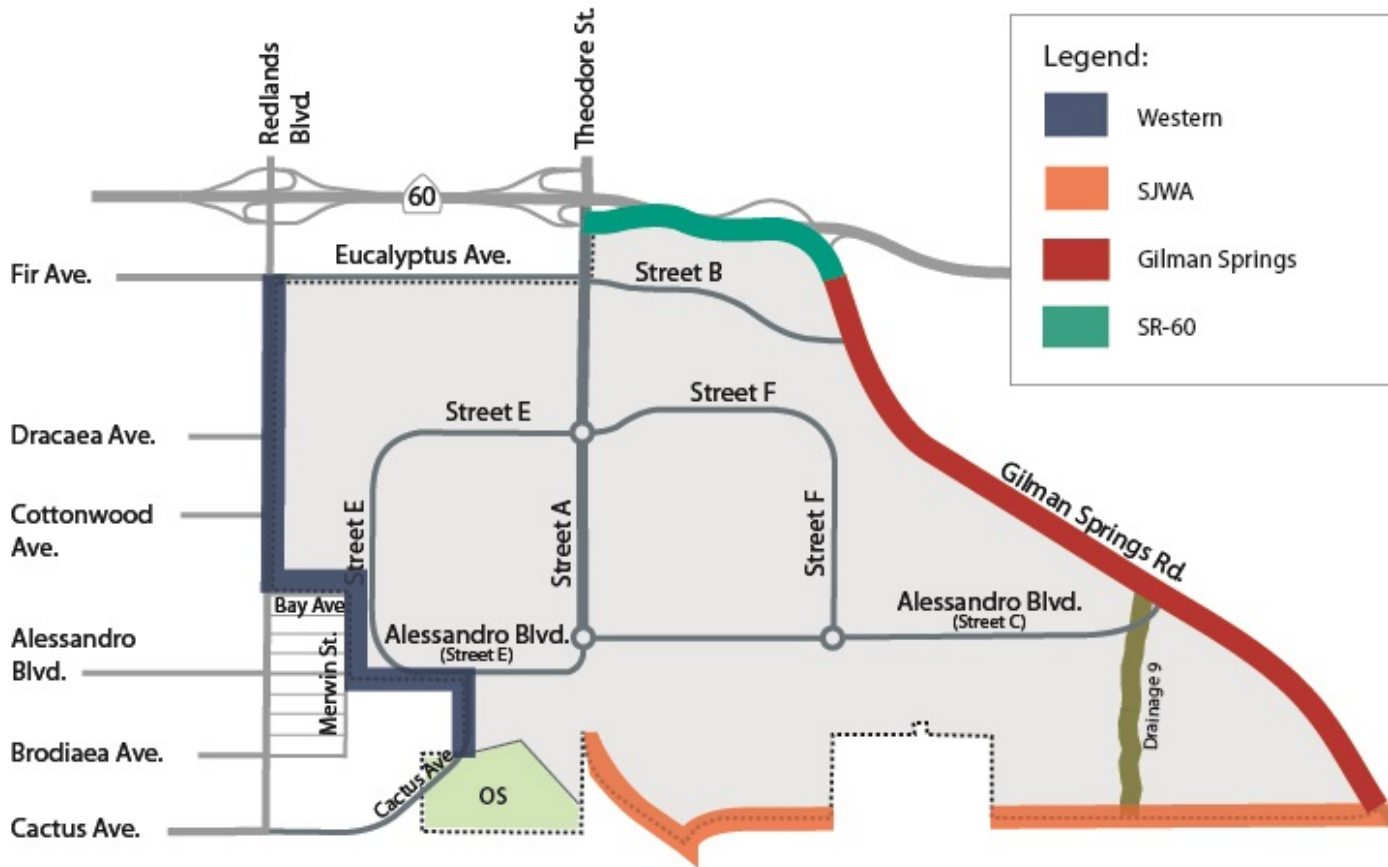
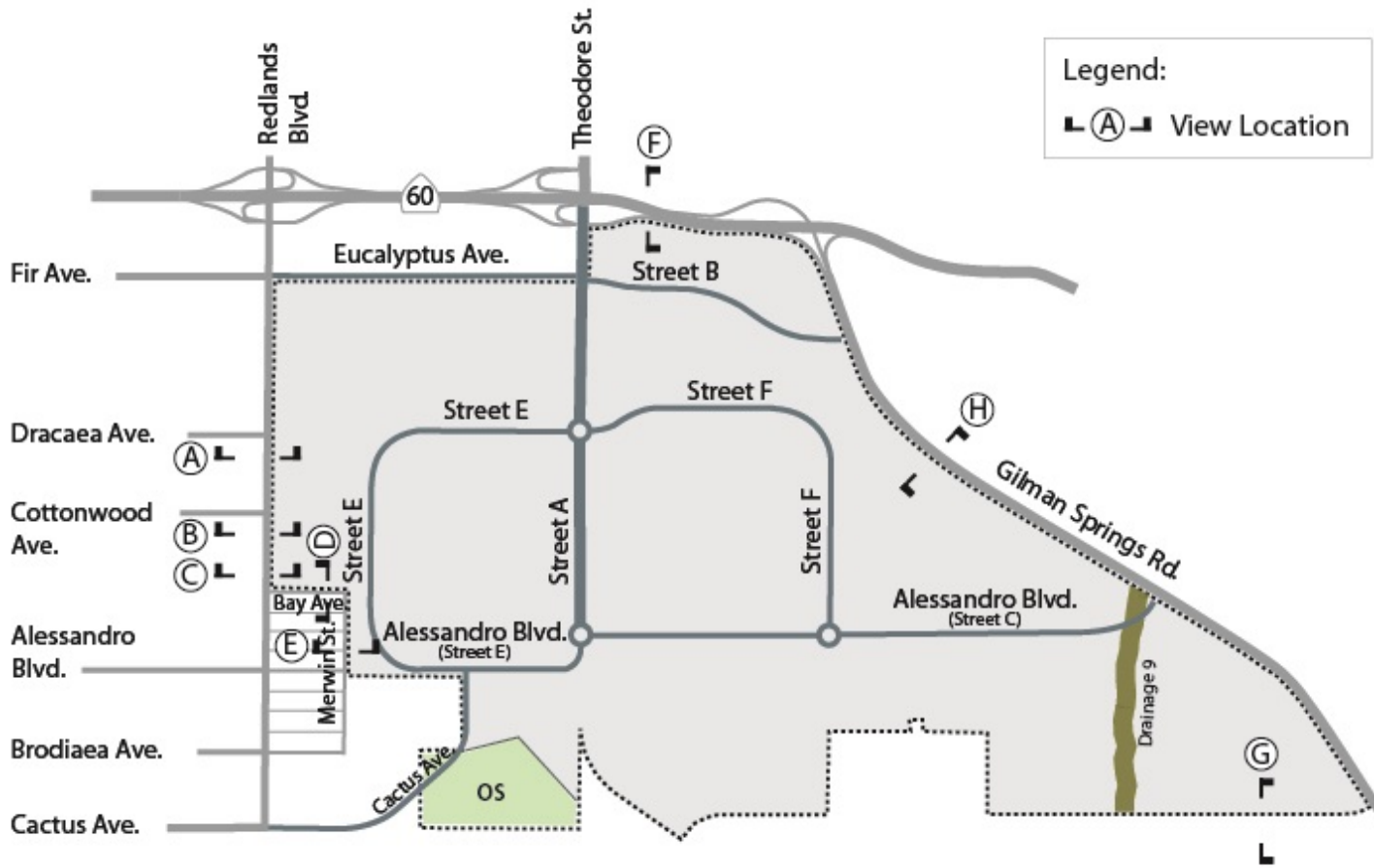


Exhibit 4-2 Edge Exhibit Map (pg.4-6)



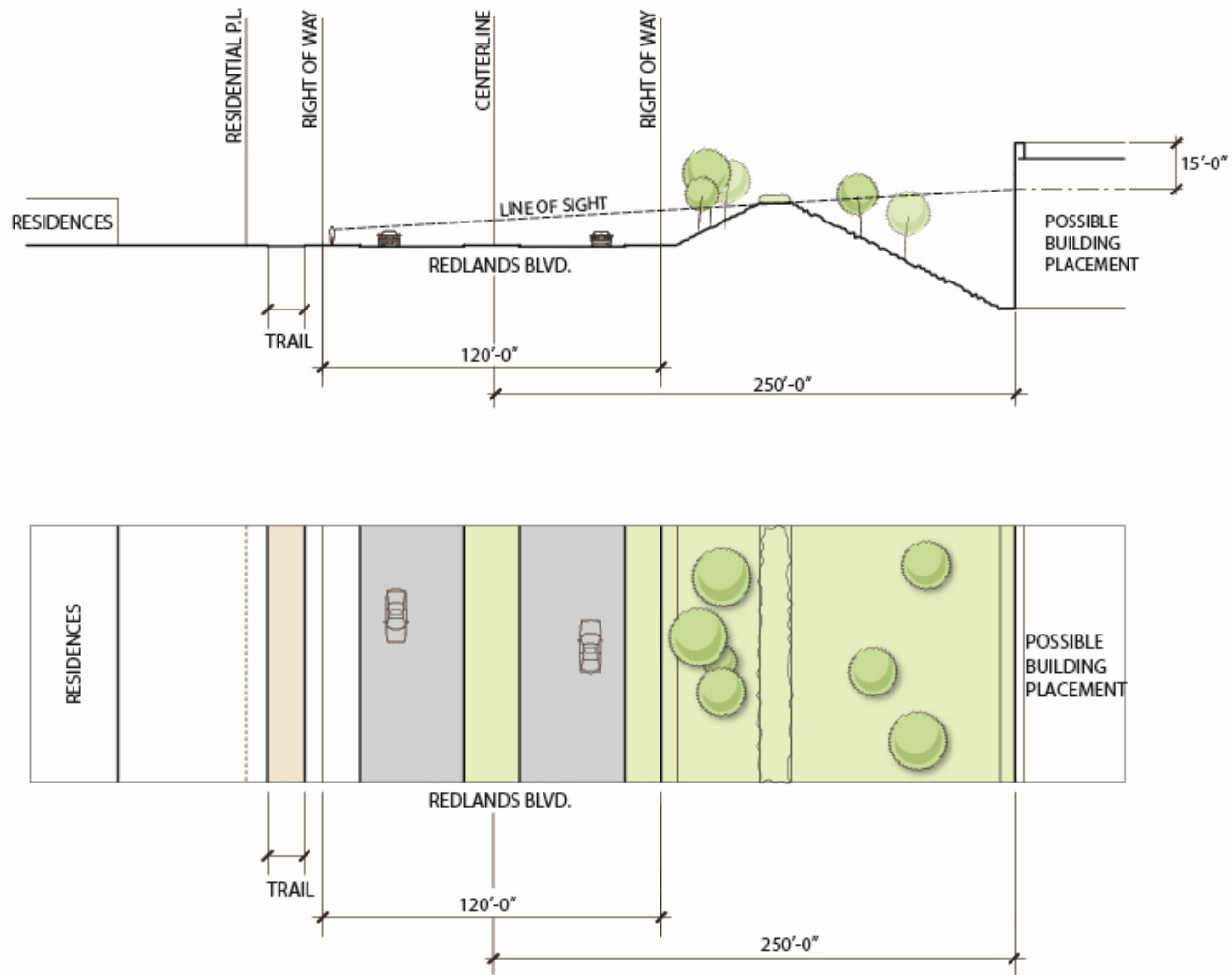
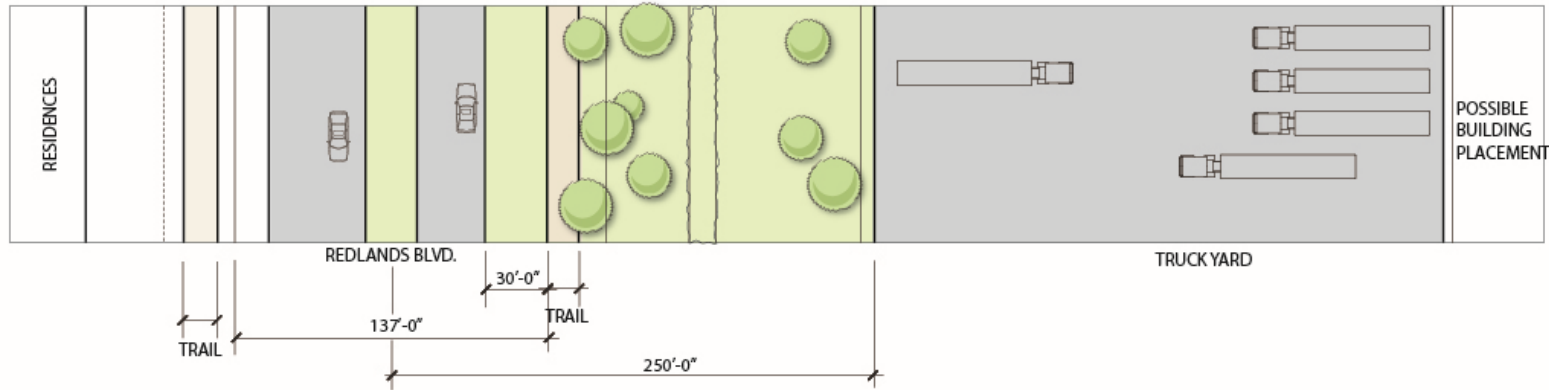
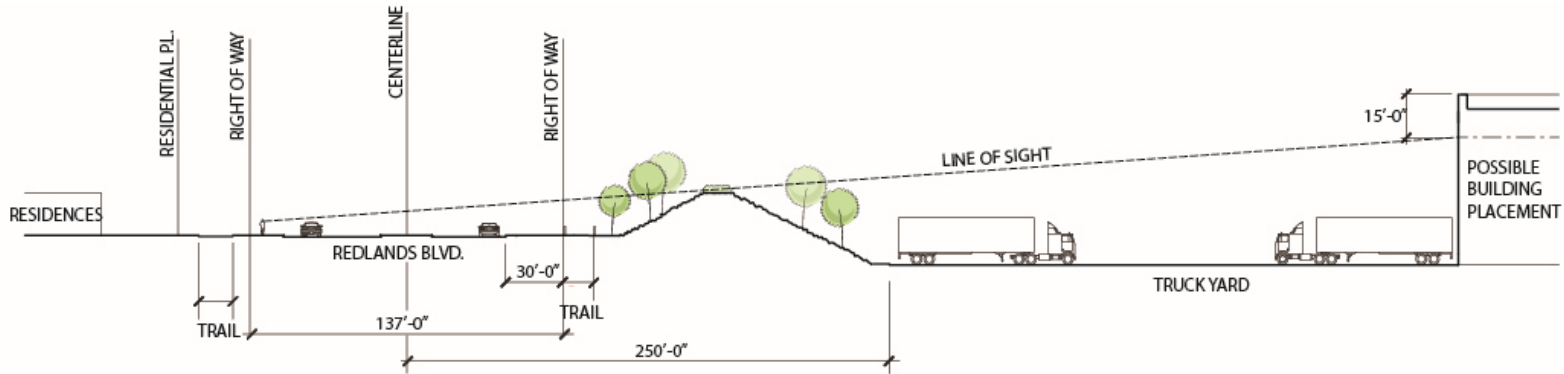


Exhibit 4-5, 4-6

Redlands Blvd. Section B and Plan View B (pg.4-7)



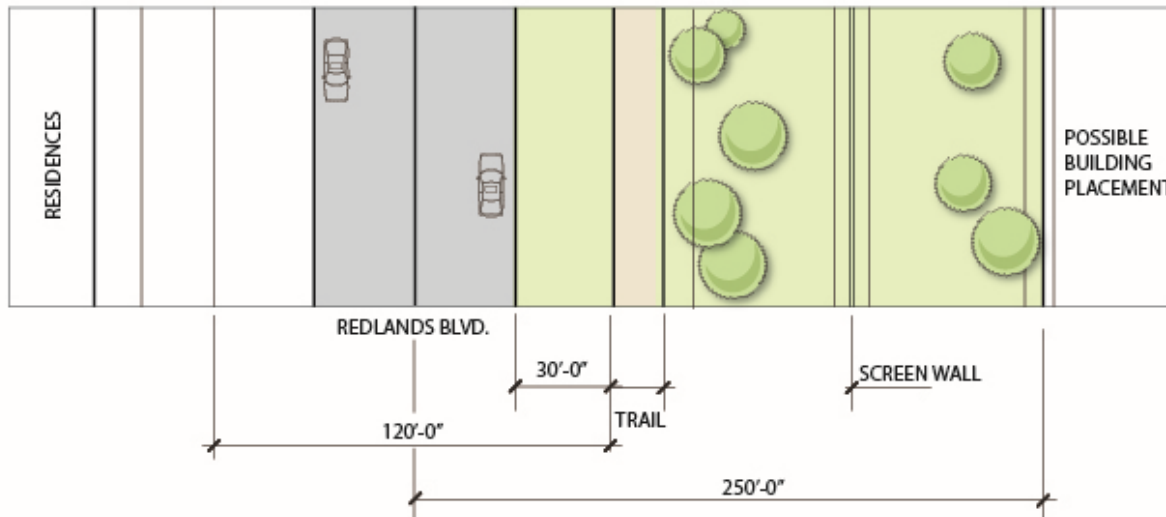
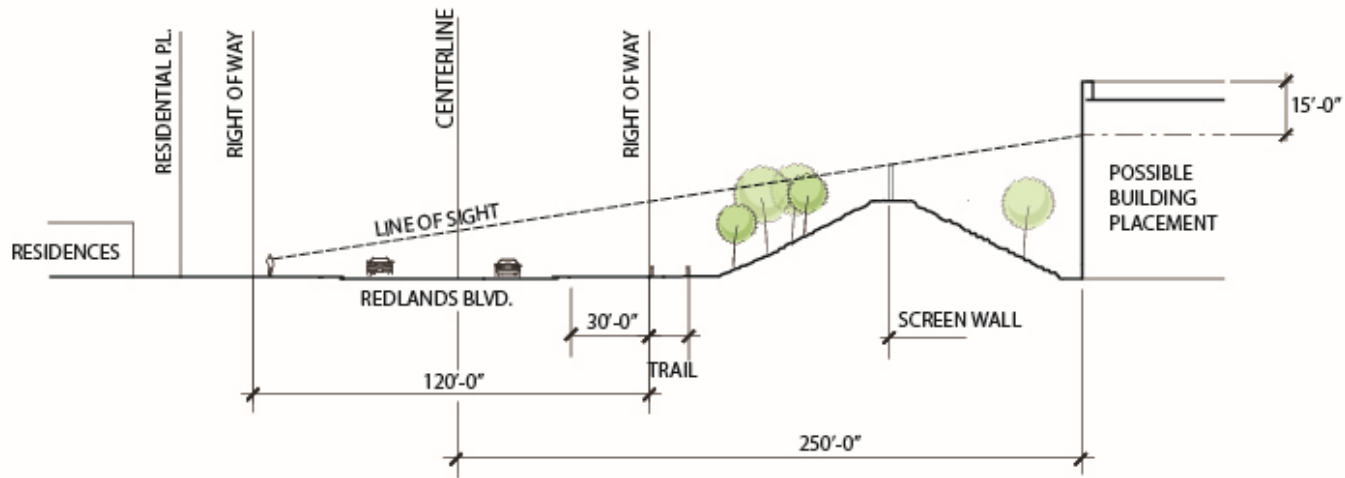
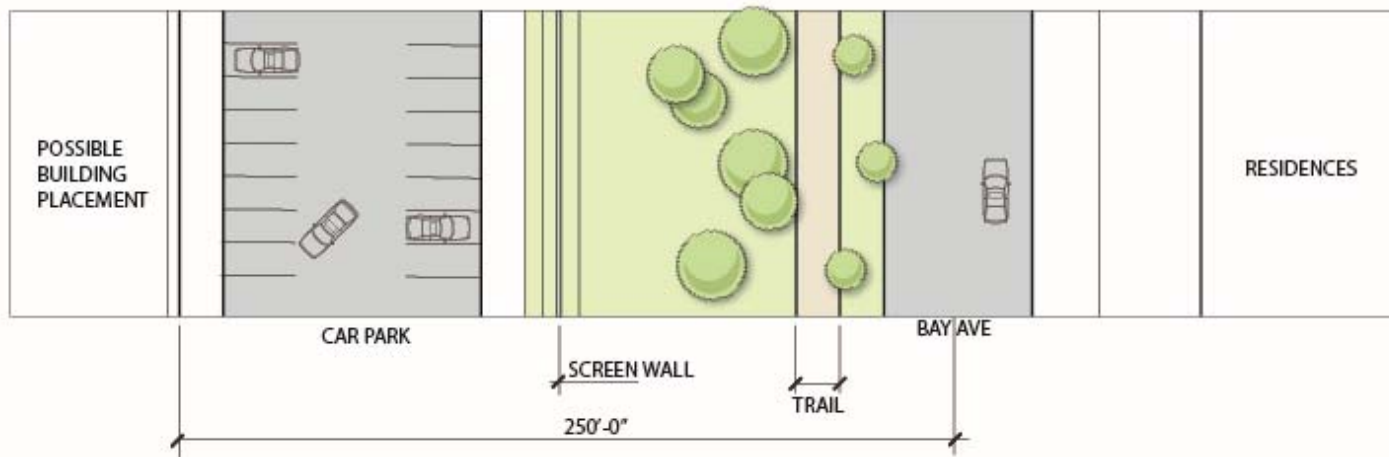
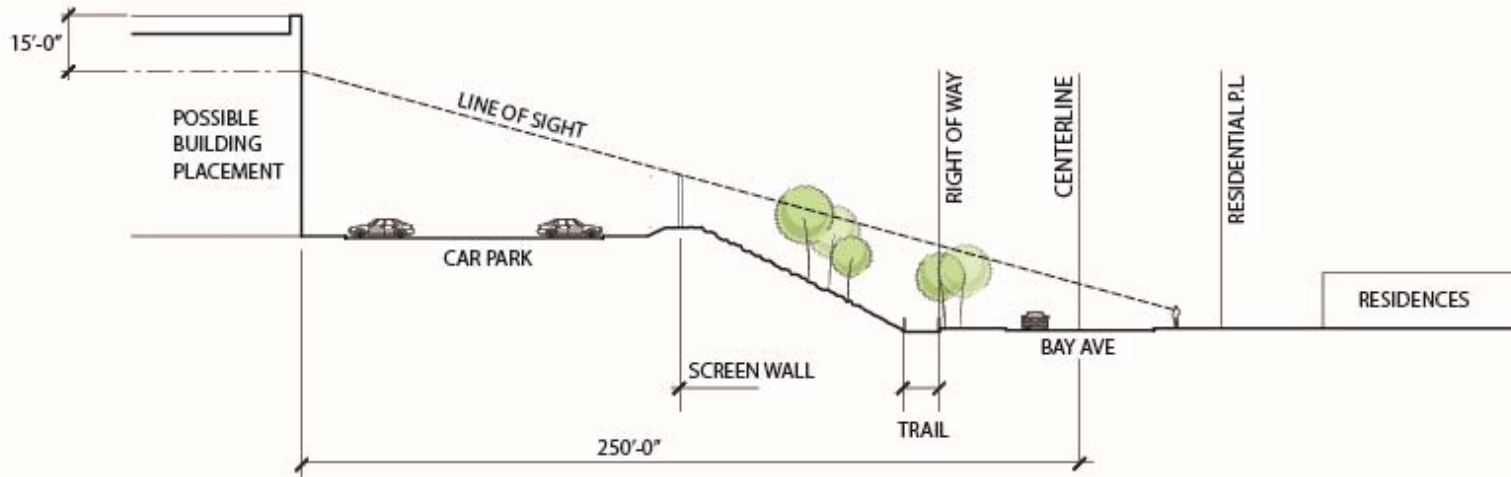


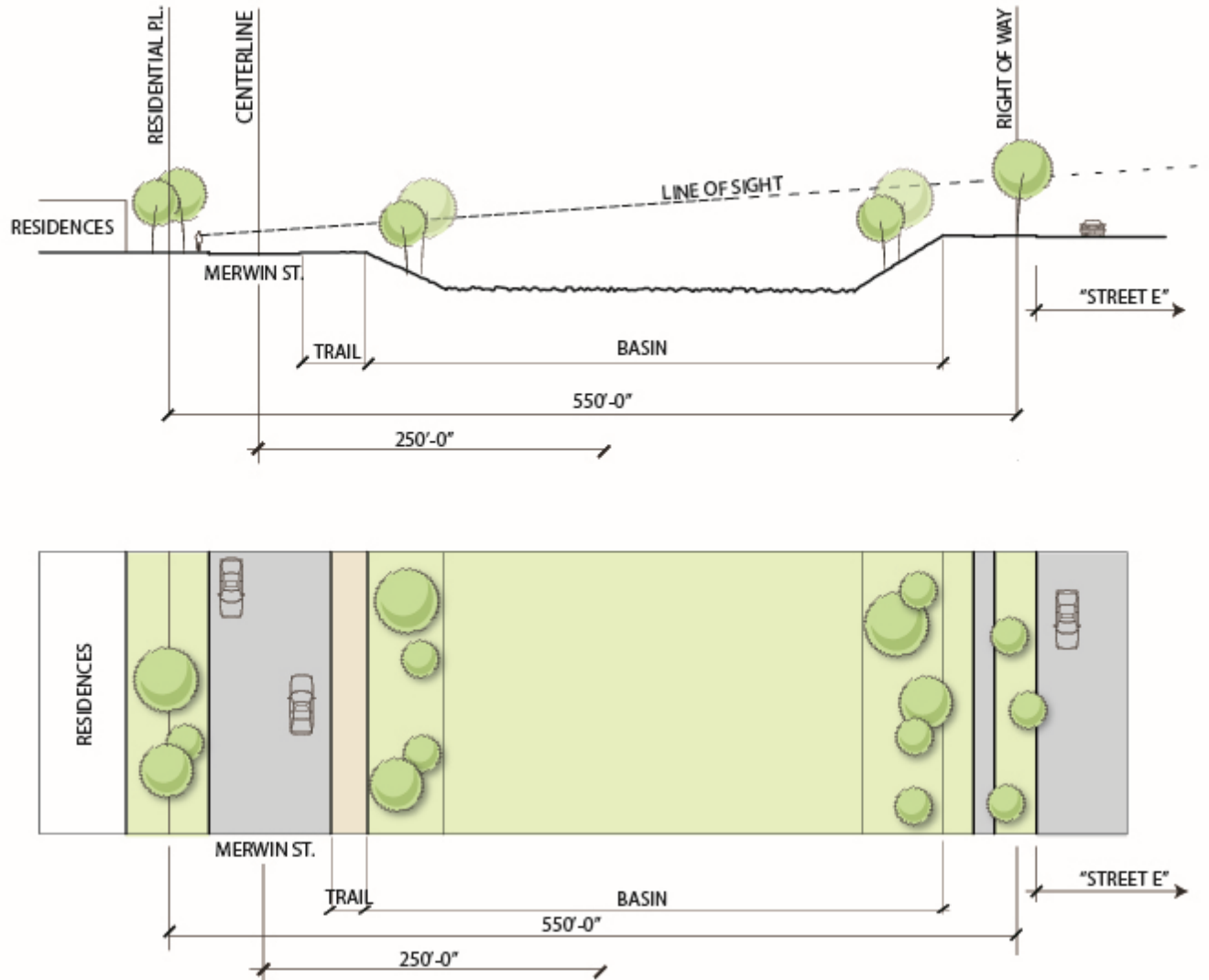
Exhibit 4-9, 4-10 Bay Avenue Section D and Plan View D (pg.4-8)



EXHIBITS

E-36

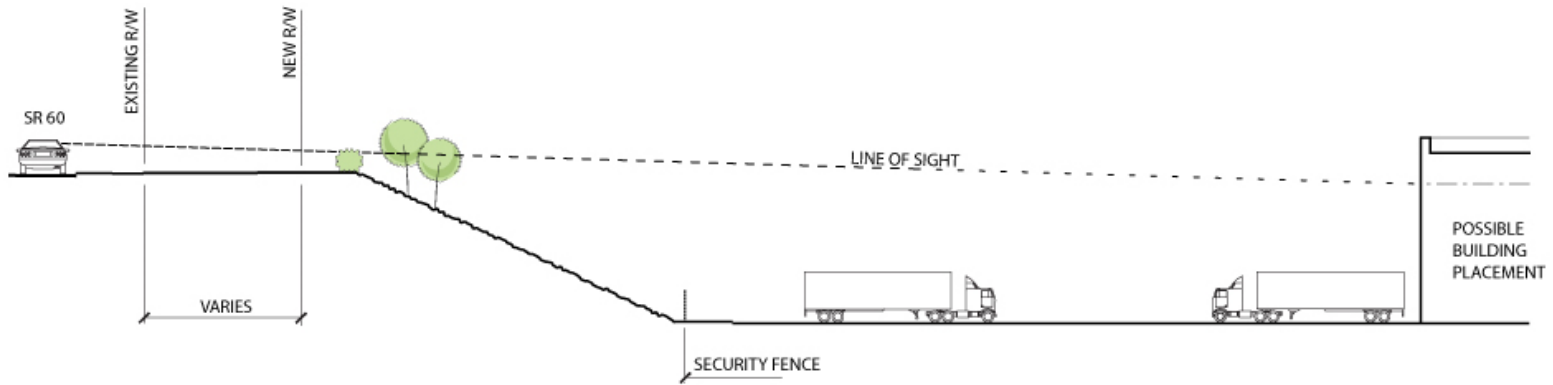
Exhibit 4-11, 4-12 Merwin Street Section E and Plan View E (pg.4-9)



EXHIBITS

E-37

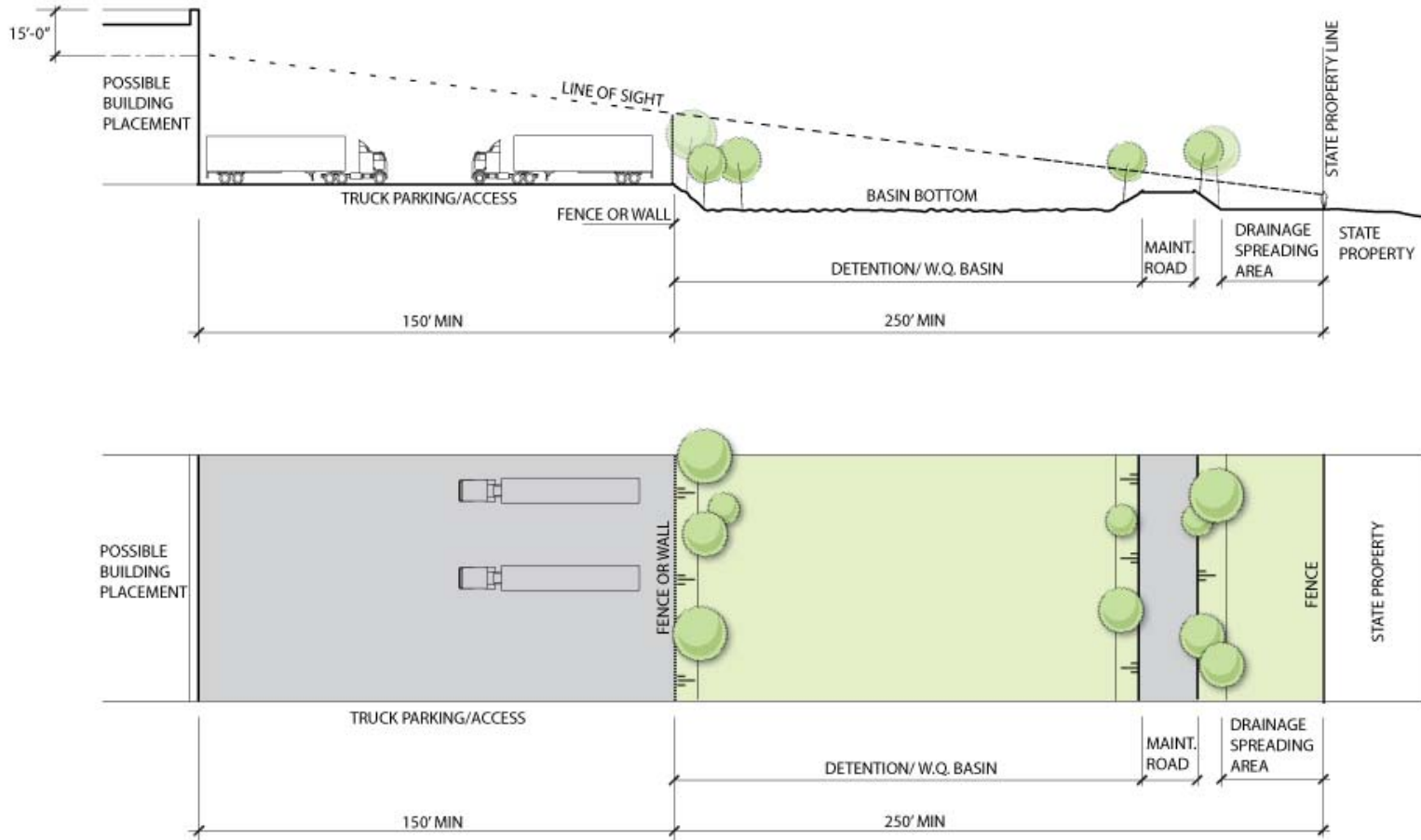
Exhibit 4-13 SR-60 between Theodore and Gilman Springs Rd. Section F (pg.4-9)



EXHIBITS

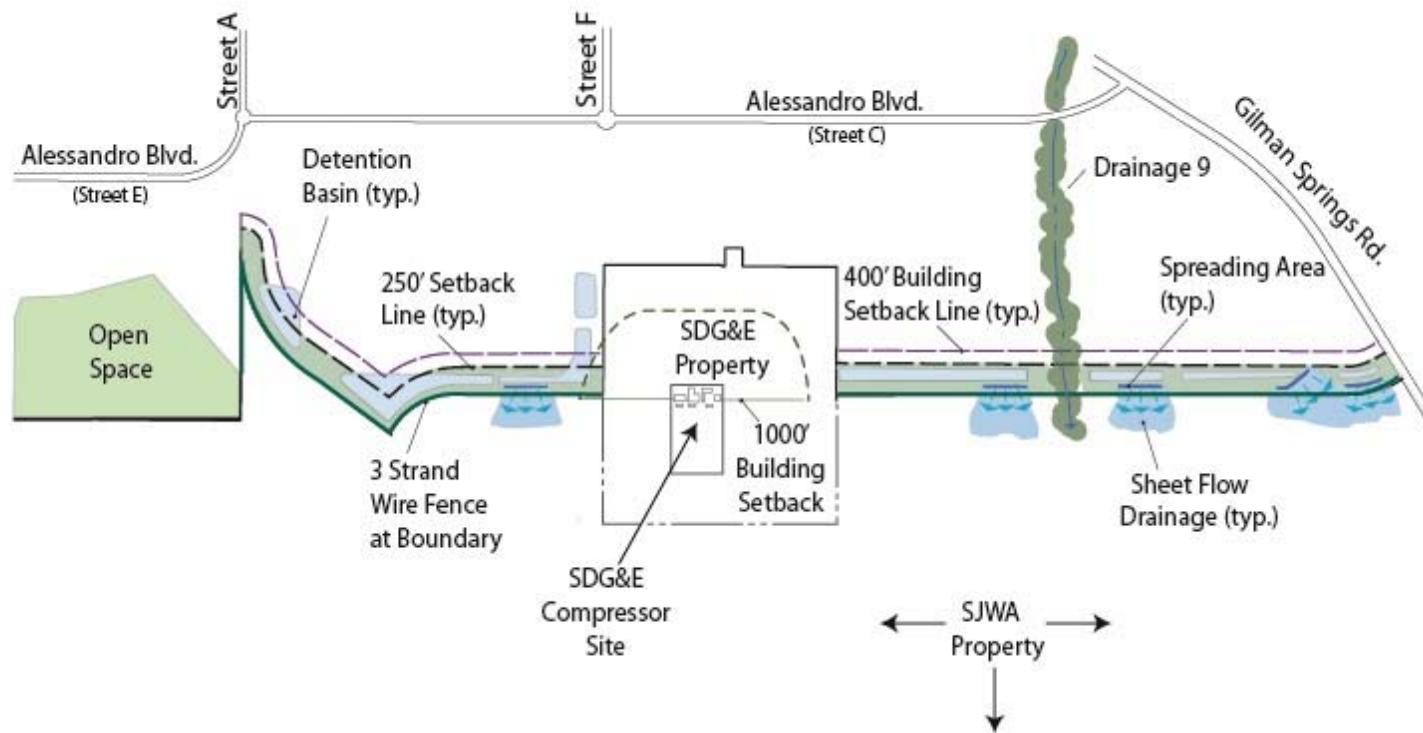
E-38

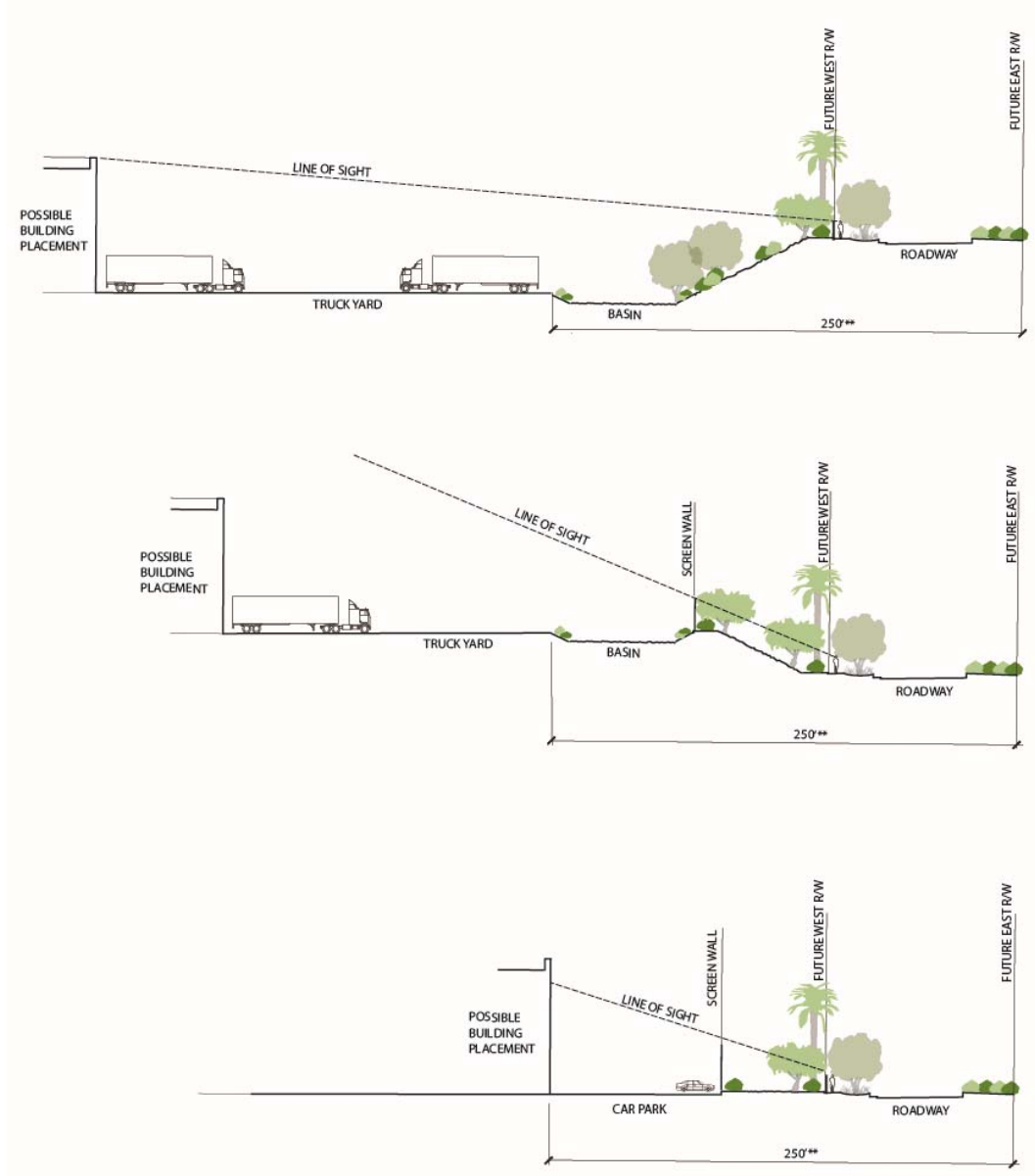
Exhibit 4-14, 4-15 SJWA Section G and Plan View G (pg.4-10)



EXHIBITS

E-39





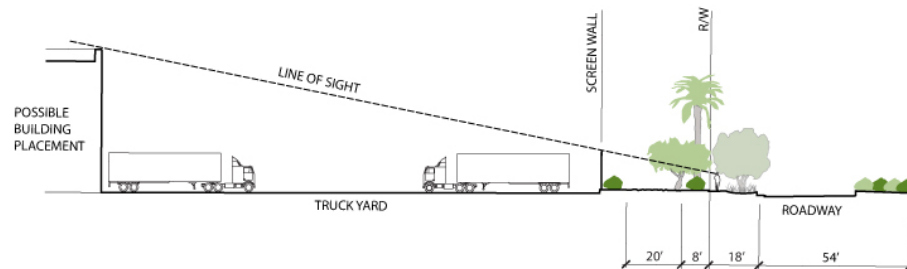
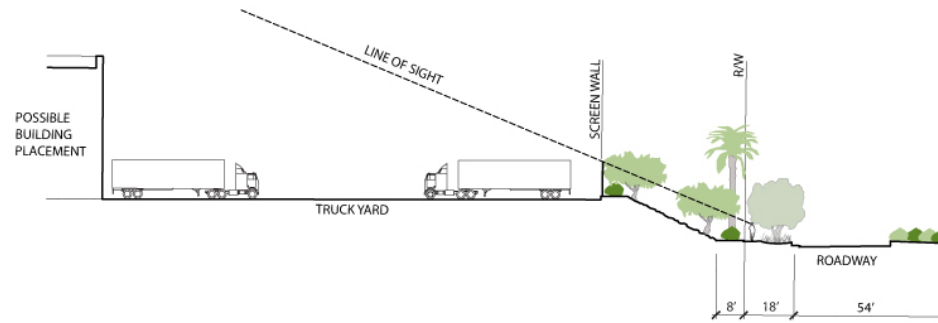
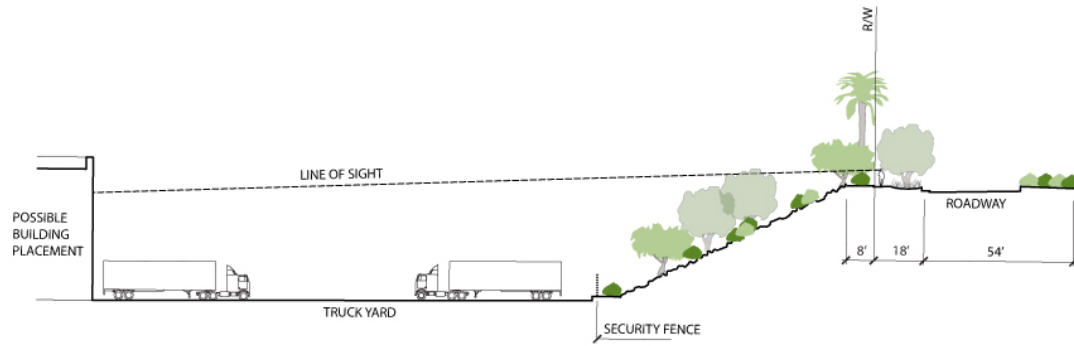


Exhibit 4-23 Perimeter Planting Map (pg.4-14)
 (See simulations on pages 4-15 to 4-29)

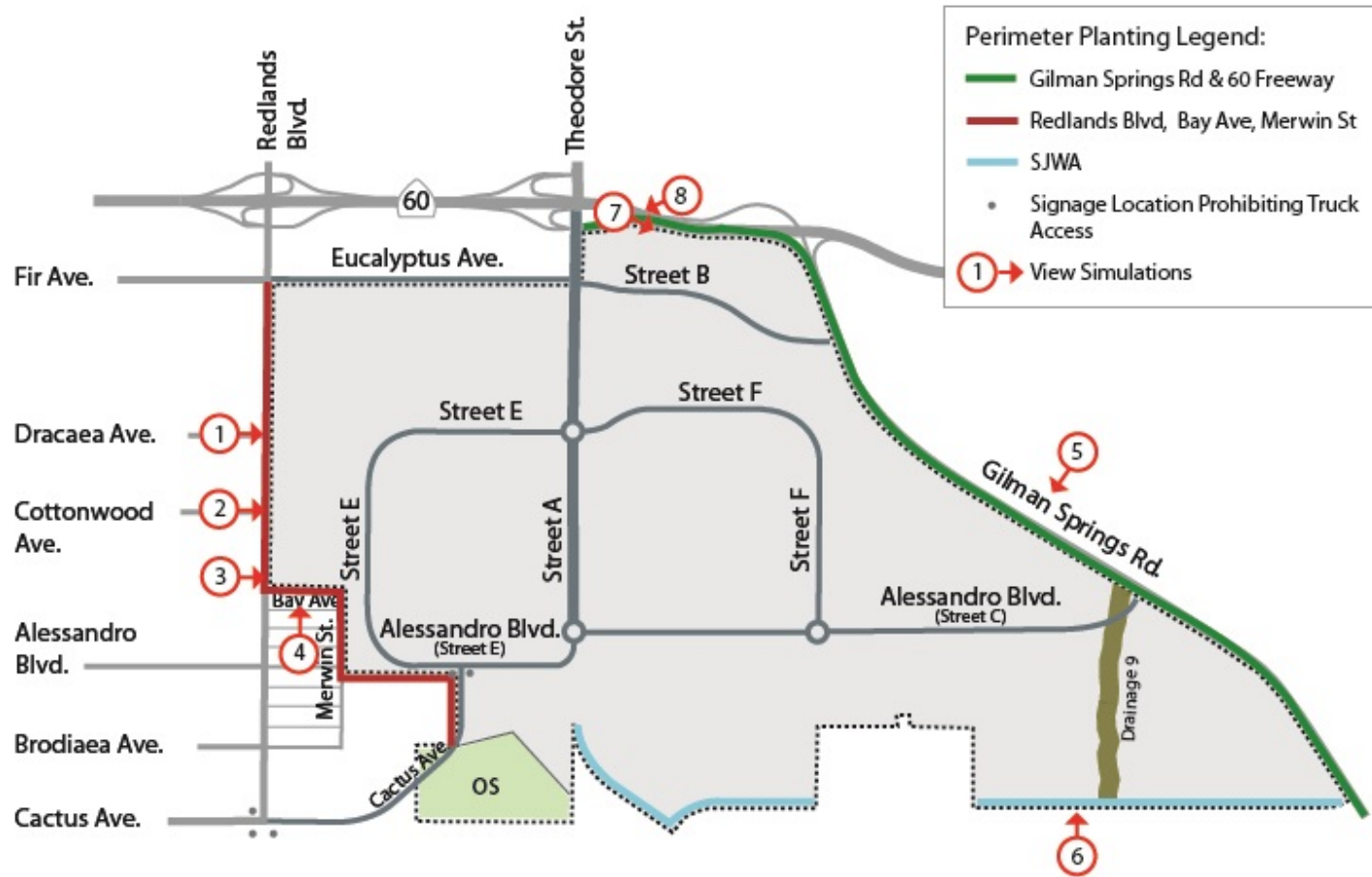


Exhibit 4-24 Roundabout & Entry Map (pg.4-30)
 (See simulations on pages 4-31 to 4-36)

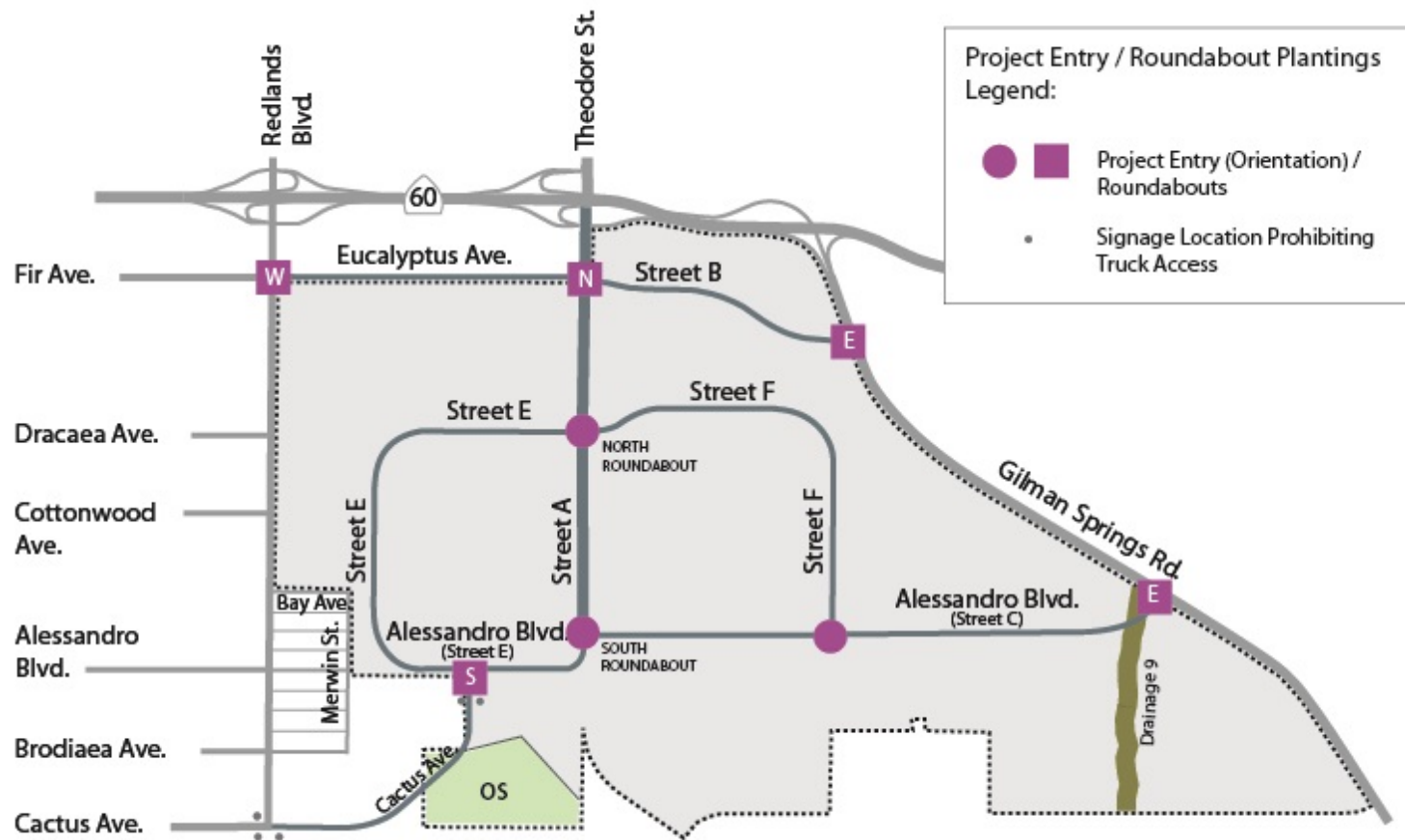


Exhibit 4-25 Streetscape Planting Map (pg.4-37)
 (See simulations on pages 4-38 to 4-42)



EXHIBITS

E-45

Exhibit 4-26 Slope Planting Guideline (pg.4-43)



EXHIBITS

E-46

Exhibit 5-1 Water Quality Management Diagram (pg.5-4)

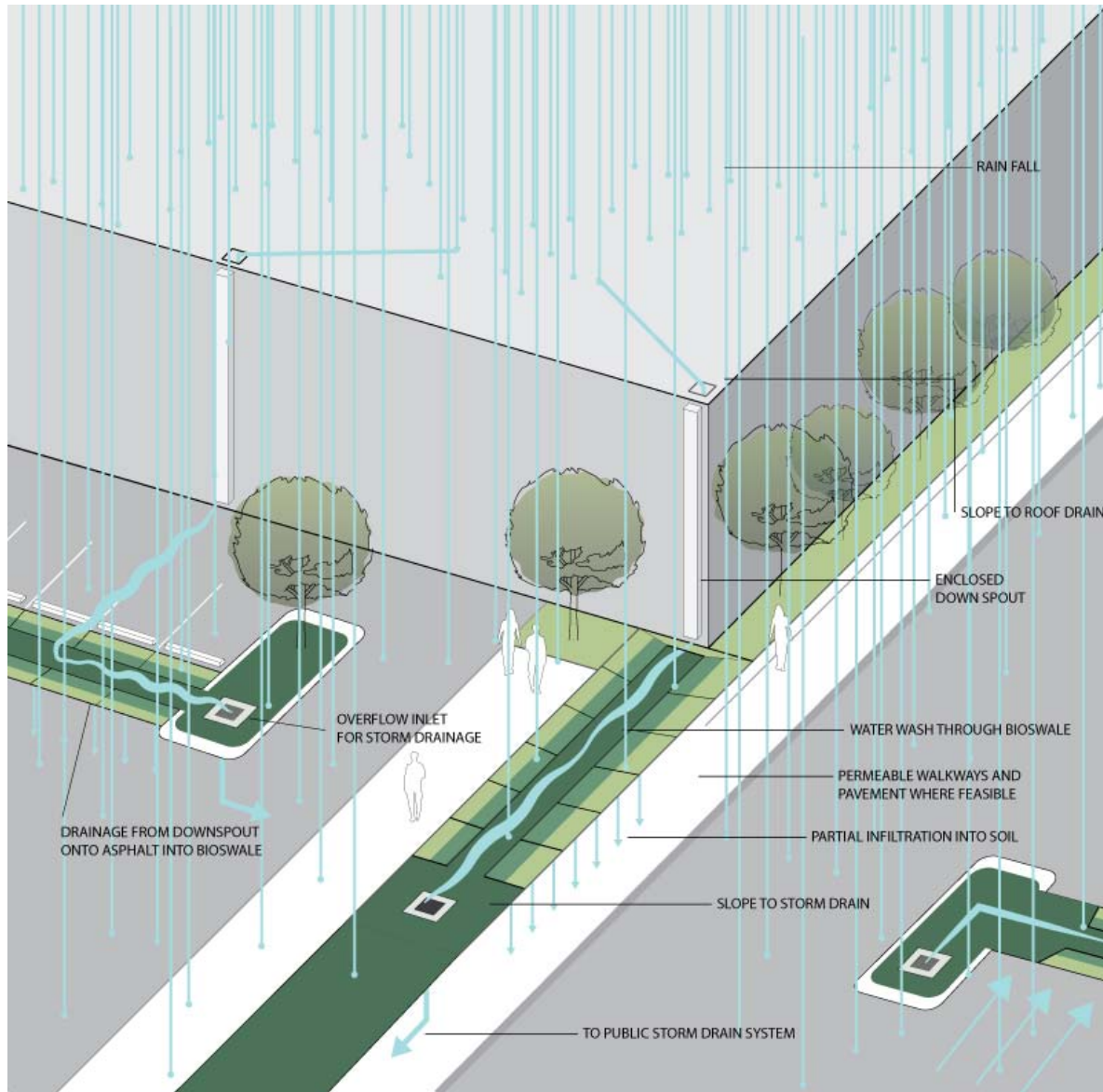


Exhibit 5-2 Visitor Parking Plan (pg.5-14)

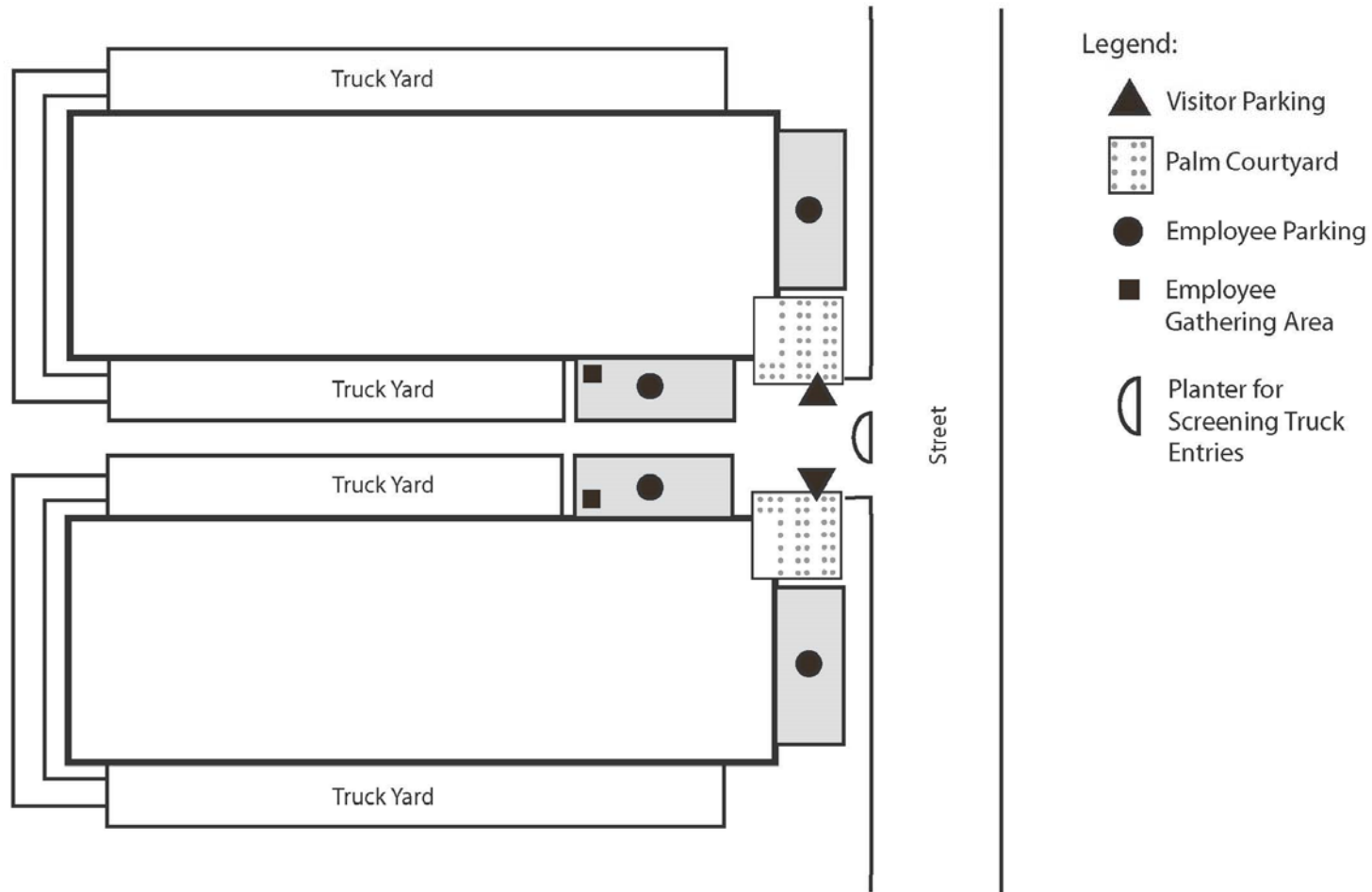


Exhibit 5-3 Building Height Plan (pg.5-21)

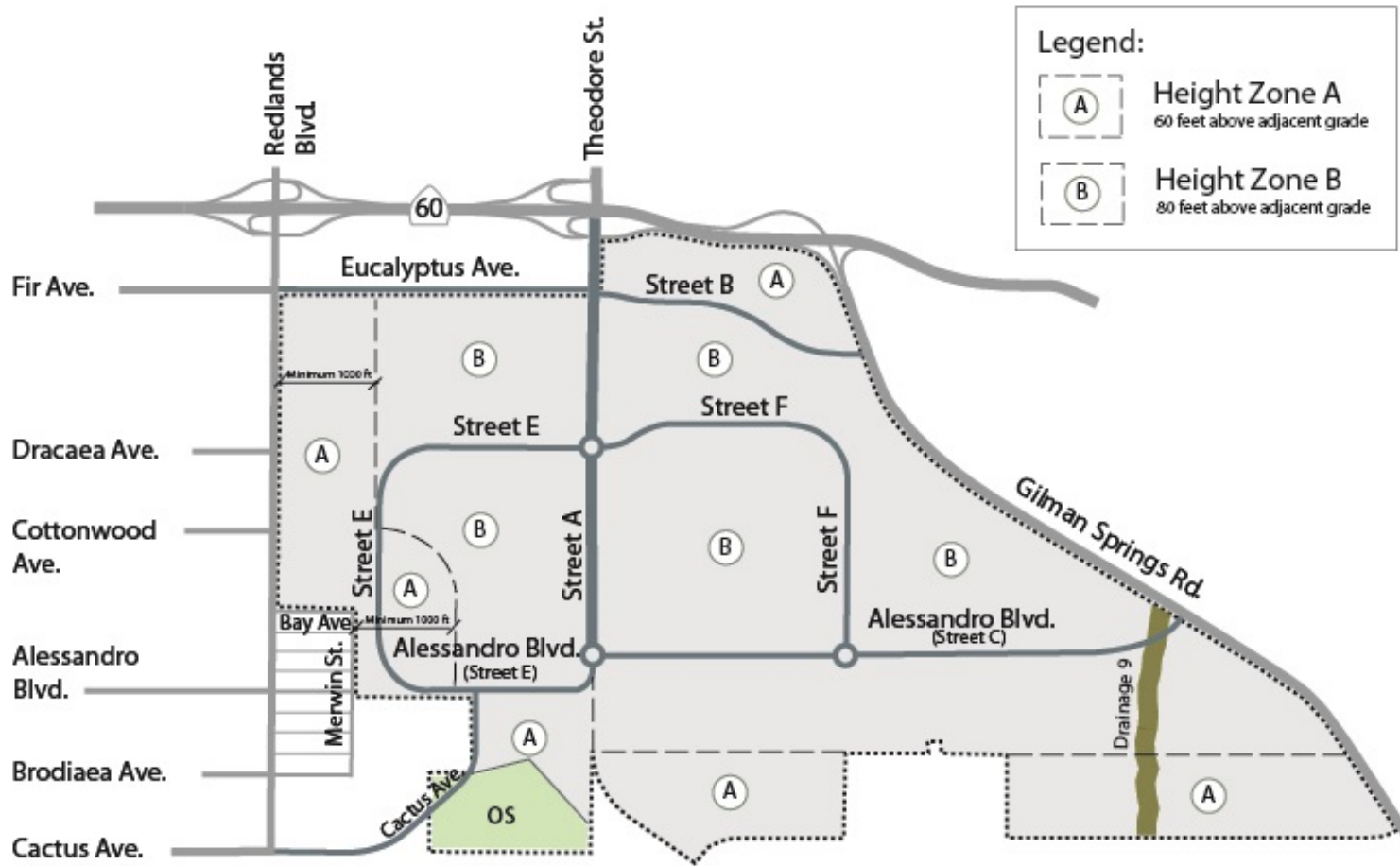
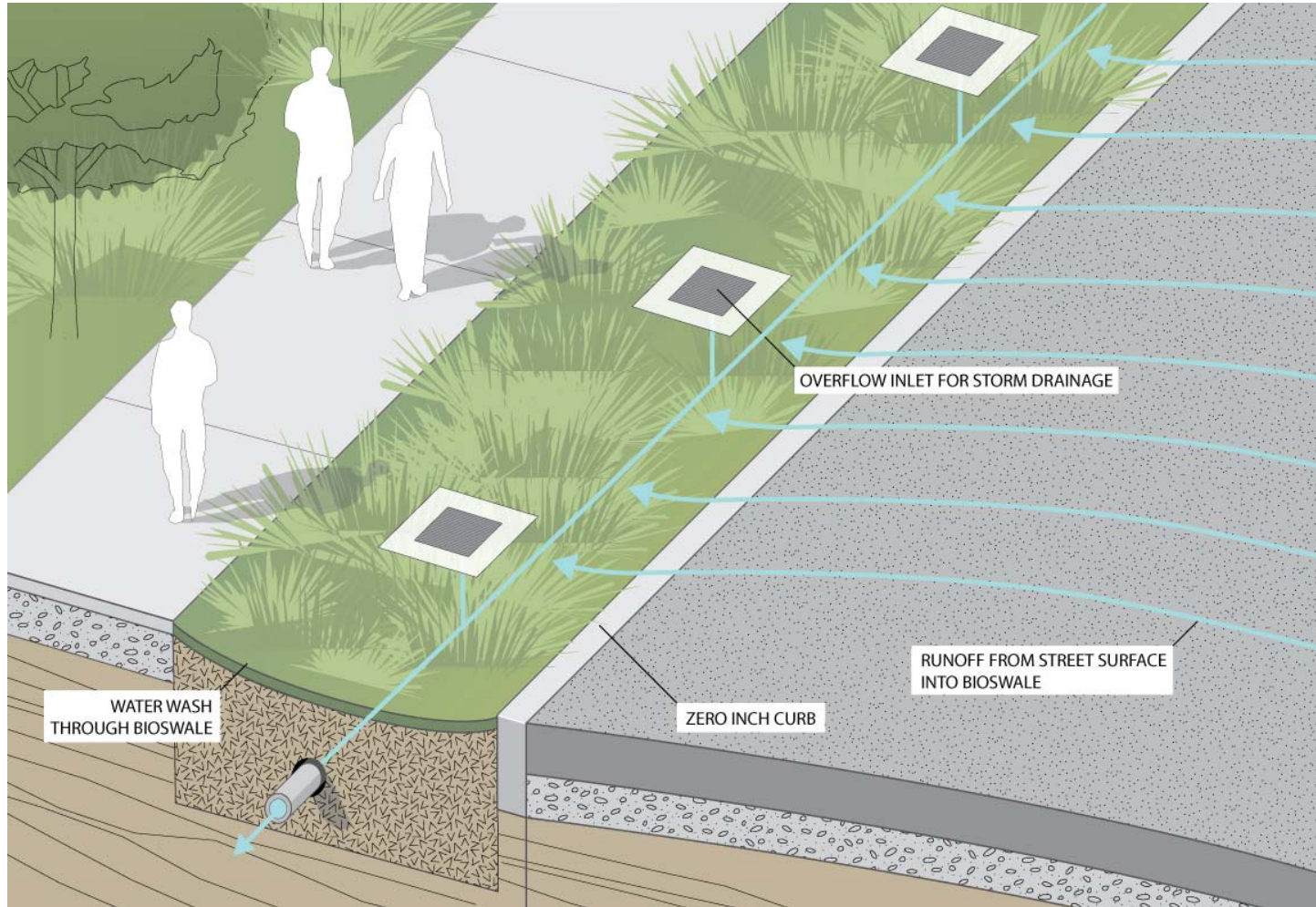


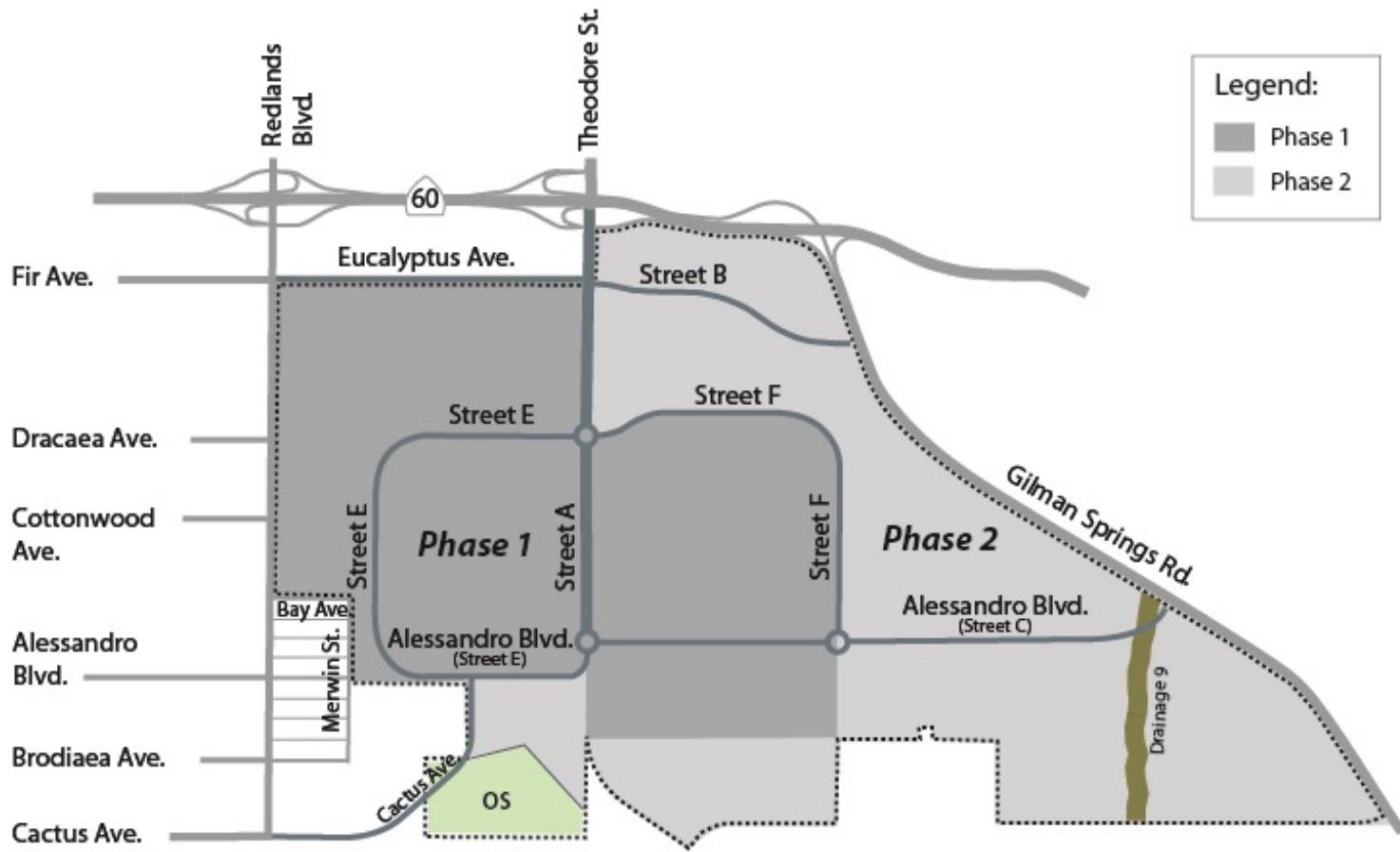
Exhibit 6-1 Off-site Water Management Plan (pg.6-1)



EXHIBITS

E-50

Exhibit 8-1 Phasing Plan (pg.8-1)



RESOLUTION NO. 2015-58

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MORENO VALLEY, CALIFORNIA APPROVING PA12-0015 (TENTATIVE PARCEL MAP NO. 36457) FOR THE PURPOSES OF ESTABLISHING TWENTY-SIX (26) PARCELS FOR FINANCING AND CONVEYANCE PURPOSES, INCLUDING AN 85 ACRE PARCEL OF LAND CURRENTLY LOCATED IN THE COUNTY OF RIVERSIDE AND ADJACENT TO GILMAN SPRINGS ROAD AND ALESSANDRO BOULEVARD INTO THE CITY OF MORENO VALLEY AND INCLUDED IN THE WORLD LOGISTICS CENTER SPECIFIC PLAN

WHEREAS, the applicant, Highland Fairview, has filed an application for Tentative Parcel Map No. 36457, including twenty six (26) parcels for financing and conveyance purposes, and which map, in part, may be used for subsequent annexation of an 85 acre parcel of land, created with the map, located adjacent to Gilman Springs Road and Alessandro Boulevard into the City of Moreno Valley; and

WHEREAS, The project also includes applications for an Environmental Impact Report (EIR) under P12-016, General Plan Amendment (PA12-0010), Change of Zone (PA12-0012), Specific Plan (PA12-0013), Pre-Zoning/Annexation (PA12-0014) and a Development Agreement (PA12-0011) All of the discretionary applications are related, but approved under separate resolutions or ordinances with individual findings; and

WHEREAS, on June 11, 2015, June 25, 2015 and June 30, 2015, the Planning Commission of the City of Moreno Valley held meetings to consider the project. At said meeting, the Planning Commission recommended the proposed project with amendments to City Council; and

WHEREAS, on July 15, 2015, the City Council of the City of Moreno Valley held a public hearing to consider Tentative Parcel Map No. 36457 along with the World Logistics Center project; and

WHEREAS, all legal prerequisites to the adoption of this Resolution have occurred; and

WHEREAS, there is hereby imposed on the subject development project certain fees, dedications, reservations and other exactions pursuant to state law and City ordinances; and

WHEREAS, pursuant to Government Code Section 66020(d)(1), **NOTICE IS HEREBY GIVEN** that this project is subject to certain fees, dedications, reservations and other exactions as provided herein.

NOW, THEREFORE, BE IT FOUND, DETERMINED AND RESOLVED by the City Council of the City of Moreno Valley as follows:

- A. This City Council hereby specifically finds that all of the facts set forth above in this Resolution are true and correct.
- B. Based upon substantial evidence presented to this City Council during the above-referenced meeting on July 15, 2015, including written and oral staff reports, and the record from the public hearing, this Planning Commission hereby specifically finds as follows:
 - 1. **Conformance with General Plan Policies** – The proposed project is consistent with applicable General and Specific Plans and the Zoning ordinance

FACT: The proposed financing map is associated with the World Logistics Center Specific Plan project and is for financing and conveyance purposes only and does not convey any development approvals for the property. Subsequent subdivision maps will be required for development of the property to occur in accordance with the proposed Specific Plan, General Plan Amendment, and Change of Zone that will designate 2,610 acres for primarily logistics development and 1,104 acres for permanent open space outside of the Specific Plan area.

The tentative map in part, may be used for subsequent annexation of an 85 acre parcel of land, created with the map, located adjacent to Gilman Springs Road and Alessandro Boulevard in the County of Riverside into the City of Moreno Valley. Approval of this tentative map does not provide any development rights and therefore does not involve the design or improvements to any subdivided property.

2. The site of the proposed land division is physically suitable for the type of development.

FACT: The proposed tentative map has been designed in accordance the City Zoning Ordinance and the State Subdivision Map Act. The tentative map is for financing and conveyance purposes only and therefore does not constitute any development rights that would allow physical improvements to the property.

3. The site of the proposed land division is physically suitable for the proposed density of development.

FACT: The proposed tentative map is consistent with the development envisioned with the proposed General Plan Amendment (PA12-0010), Specific Plan (PA12-0013) and Change of Zone (PA12-0012) for the overall World Logistics Center Project. Said map is only for financing and conveyance purposes and does not constitute any development rights.

4. The design of the subdivision or the type of improvements is not likely to cause substantial environmental damage or substantially and avoidably injure fish and wildlife or their habitat.

FACT: An Environmental Impact report (EIR) has been prepared for the overall project, including the proposed Tentative Parcel Map. Analysis presented in the EIR indicates that the proposed project will have certain significant unavoidable adverse impacts to Aesthetics, Air Quality, Land Use, Noise, and Traffic/Circulation, as described in detail within the draft document. All other environmental effects evaluated in the Draft EIR are considered to be less than significant, or can be feasibly reduced with mitigation measures to less than significant levels. A Statement of Overriding Findings and Considerations has been prepared for said project that is weighed with impacts that cannot be reduced to less than significant levels. Said EIR is required to be certified and approved as a part of the proposed project and is also accompanied by a Mitigation Monitoring Program, which will ensure the completion of required mitigation measures for the project. The proposed tentative map does

not constitute any development rights that would allow physical improvements to the property.

5. The design of the subdivision or the type of improvements is not likely to cause serious health problems.

FACT: The proposed tentative map does not constitute any development rights that would allow physical improvements to the property. The overall WLC Specific Plan includes design standards that are considerate, minimize and/or avoid environmental impacts to surrounding sensitive land uses.

6. The design of the proposed land division or type of improvements will not conflict with easements, acquired by the public at large, for access through, or use of, property within the proposed land division.

FACT: The proposed tentative map does not constitute any development rights that would allow physical improvements to the property. There are no known conflicts with easements on the subject site. The City Engineer has appropriately placed conditions of approval on Tentative Parcel Map No. 36457. Individual subsequent subdivision maps will be required to develop the property. Additional conditions of approval may be warranted when future development applications and plot plans are submitted.

7. That the Requirements of the California Environmental Quality Act have been satisfied.

FACT: All requirements of the California Environmental Quality Act have been satisfied. Based on scope of the project, a Program Environmental Impact Report (EIR) was prepared. Due to the large project size, proposed phasing of the project and limited information known about future development of industrial buildings, a programmatic EIR rather than a project EIR has been prepared. Although the environmental document is considered a programmatic document, allowances within the CEQA Guidelines will be provided through the “tiered approach” to allow compliance through individual parts of the project to tier off of the main document when development proposals are submitted.

Per California Environmental Quality Act (CEQA) Guidelines, the Draft Environmental Impact Report (DEIR) document was

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Resolution No. 2015-58
Date adopted: July 15, 2015

required to be circulated for a 45-day public review period. Notice of completion and availability of the document was provided on February 5, 2013, with over a 60-day review period imposed with the public review and comment period ending on April 8, 2013. The final EIR was provided to the public approximately 41 days prior to the Planning Commission public hearing.

While the proposed tentative map does not constitute any development rights that would allow physical improvements to the property, the EIR prepared for the overall WLC project indicates that the project will have certain significant environmental impacts to, Aesthetics, Air Quality, Land Use, Noise, and Traffic/Circulation as described in detail in both the Draft EIR and Final EIR that cannot be reduced to less than significant levels even with proposed mitigation in place. As identified in the document, cumulative impacts for the noted impacts above are considered to be significant and unavoidable for these five items. The EIR presented mitigation measures, which, to the extent feasible, will reduce project-specific and cumulative impacts for each of these items; however in some instances this did not reduce impacts below significant thresholds. All other environmental effects evaluated in the Draft EIR have been determined to be less-than-significant, or can be successfully mitigated below significant thresholds. All mitigation measures are included in the Mitigation Monitoring and Reporting Program established by the Environmental Impact Report.

Although impacts to aesthetics, air quality, land use, noise, and traffic/circulation cannot be reduced to less than significant levels, CEQA allows for a Statement of Overriding Considerations and findings to be prepared and considered. CEQA requires the decision making agency to balance the economic, legal, social, technological or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the proposed project. This would include project benefits of the WLC Project such as the creation of jobs, reducing the jobs housing imbalance or other benefiting project aspects that can be weighed against project impacts that cannot be mitigated to less than significant levels. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the

adverse environmental effects may be considered "acceptable" as allowed for under CEQA.

BE IT FURTHER RESOLVED that the City Council **HEREBY APPROVES** Resolution No. 2015-58, **APPROVING** PA12-0015 (Tentative Tract Map No. 36457) for the purpose of establishing twenty six (26) parcels for future development within 2,610 acres included in the proposed World Logistics Specific plan for a logistics high cube warehouse complex and open space, to include the annexation of approximately 85 acres to be annexed from the County of Riverside into the City of Moreno Valley subject to the attached map and conditions of approval hereto as Exhibits A and B and based on the Certification and Adoption of the Environmental Impact Report, Mitigation Monitoring Program and Statement of Overriding Considerations

APPROVED and ADOPTED this _____ day of July, 2015.

Mayor of the City of Moreno Valley

ATTEST:

City Clerk

APPROVED AS TO FORM:

City Attorney

Attached: Conditions of Approval

6
Resolution No. 2015-58
Date adopted: July 15, 2015

Attachment: Proposed Resolution_Tentative Parcel Map [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL

RESOLUTION JURAT

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF MORENO VALLEY)

I, Jane Halstead, City Clerk of the City of Moreno Valley, California, do hereby certify that Resolution No. 2015-58 was duly and regularly adopted by the City Council of the City of Moreno Valley at a regular meeting thereof held on the 15th day of July, 2015 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

(Council Members, Mayor Pro Tem and Mayor)

CITY CLERK

(SEAL)

7
Resolution No. 2015-58
Date adopted: July 15, 2015

Attachment: Proposed Resolution_Tentative Parcel Map [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL

CITY OF MORENO VALLEY
CONDITIONS OF APPROVAL
FOR
TENTATIVE PARCEL MAP
Case No: PA12-0015
A.P.N.: Various Properties on File

Approval Date: _____
Expiration Date: _____

The following conditions are attached for the following departments:

- Planning (P), including School District (S), Post Office (PO), Building (B)
- Fire Prevention Bureau (F)
- Public Works, Land Development (LD)
- Public Works, Special Districts (SD)
- Public Works – Transportation (TE)
- Parks & Community Services (PCS)
- Police (PD)
- Moreno Valley Utilities
- Other (Specify or Delete)

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

Planning Division

GENERAL CONDITIONS

P1. This approval shall comply with all applicable requirements of the City of Moreno Valley Municipal Code.

Timing Mechanisms for Conditions (see abbreviation at beginning of affected condition):

- | | | |
|------------------------------|-----------------------------|---------------------|
| R - Map Recordation | GP - Grading Permits | CO - Certificate of |
| | Occupancy or building final | |
| WP - Water Improvement Plans | BP - Building Permits | P - Any permit |

Governing Document (see abbreviation at the end of the affected condition):

- | | | |
|-------------------|----------------------------------|-------------------|
| GP - General Plan | MC - Municipal Code | CEQA - California |
| | Environmental Quality Act | |
| Ord - Ordinance | DG - Design Guidelines | Ldscp - Landscape |
| | Development Guidelines and Specs | |
| Res - Resolution | UFC - Uniform Fire Code | UBC - Uniform |
| | Building Code | |

SBM - Subdivision Map Act

**PLANNING DIVISION
CONDITIONS OF APPROVAL**

Page 2

- P2. This tentative map shall expire three years after the approval date of this tentative map unless extended as provided by the City of Moreno Valley Municipal Code; otherwise it shall become null and void and of no effect whatsoever in the event the applicant or any successor in interest fails to properly file a final map before the date of expiration. (MC 9.02.230, 9.14.050, 080)
- P3. The site shall be developed in accordance with the approved tentative map on file in the Community & Economic Development Department -Planning Division, the Municipal Code regulations, General Plan, World Logistics Center Specific Plan and the conditions contained herein. Prior to recordation of the final map, all Conditions of approval shall be completed to the satisfaction of the City Planning Official or designee. (MC 9.14.020)
- P4. The developer or the developer's successor of interest shall be responsible for maintaining any undeveloped portions of the site in a manner that provides for the control of weeds, erosion and dust. (MC 9.02.030)
- P5. (R) Prior to final map recordation, subdivision phasing (including any proposed common open space or improvement phasing, if applicable), shall be subject to the Planning Division approval. Any proposed phasing shall provide for adequate vehicular access to all lots in each phase as determined by the City Transportation Engineer or designee and shall substantially conform to all intent and purpose of the subdivision approval. (MC 9.14.080)
- P6. Tentative Parcel Map No. 36457 would grant the approval to subdivide 1,539.2-gross acres into 26 lots for finance and land conveyance purposes only and does not provide any rights for development. No applications for building or grading permits shall be accepted for the parcel or parcels created by this map until a future application for development under the Specific Plan has been approved by the City, or as prescribed by conditions of approval already in place with underlying entitlement approval that govern continued or subsequent development of the property as described on the face of the map per MC 9.14.065 (3d).
- P7. Any submittal requirements which were waived in connection with the financing map in accordance with 9.14.065(3a.) shall be submitted concurrently with the first discretionary application for development of the property covered by the map (i.e. with an application for a future map or plot plan).

**PLANNING DIVISION
CONDITIONS OF APPROVAL
Page 3**

PRIOR TO FINAL MAP

- P8. Tentative Tract Map No. 36457 may be acted upon in the manner provided in Government Code Section 66452, except that if the final map is approved, such approval with respect to Parcel 26 shall be conditioned upon annexation of that property to the City of Moreno Valley.

**CITY OF MORENO VALLEY
COMMUNITY & ECONOMIC DEVELOPMENT - LAND DEVELOPMENT DIVISION
CONDITIONS OF APPROVAL
PA12-0015 / TPM 36457 – 26 Parcel Financing Map**

COMMUNITY & ECONOMIC DEVELOPMENT – LAND DEVELOPMENT DIVISION

The following are the Community & Economic Development Department – Land Development Division Conditions of Approval for this project and shall be completed at no cost to any government agency. All questions regarding the intent of the following conditions shall be referred to the Community & Economic Development Department – Land Development Division.

General Conditions

- LD1.** The developer shall comply with all applicable City ordinances and resolutions including the City’s Municipal Code (MC) and if subdividing land, the Government Code (GC) of the State of California, specifically Sections 66410 through 66499.58, said sections also referred to as the Subdivision Map Act (SMA). (MC 9.14.010)
- LD2.** If the project involves the subdivision of land, maps may be developed in phases with the approval of the City Engineer. Financial security shall be provided for all improvements associated with each phase of the map. The boundaries of any multiple map increment shall be subject to the approval of the City Engineer. The City Engineer may require the dedication and construction of necessary utilities, streets or other improvements outside the area of any particular map, if the improvements are needed for circulation, parking, access, or for the welfare or safety of the public. (MC 9.14.080, GC 66412 and 66462.5)
- LD3.** It is understood that the [Tentative Parcel Map](#) correctly shows all existing easements, traveled ways, and drainage courses, and that their omission may require the map or plans associated with this application to be resubmitted for further consideration. (MC 9.14.040)
- LD4.** Each parcels of land shall have access from a public road, or public access is both feasible and required for approval of the proposed map (MC 9.14.065)
- LD5.** Prior to approval of the map, all street dedications shall be irrevocably offered to the public and shall continue in force until the City accepts or abandons such offers, unless otherwise approved by the City Engineer. All dedications shall be free of all encumbrances as approved by the City Engineer.
- LD6.** The developer shall protect downstream properties from damage caused by alteration of drainage patterns, i.e., concentration or diversion of flow. Protection shall be provided by constructing adequate drainage facilities, including, but not limited to, modifying existing facilities or by securing a drainage easement. (MC 9.14.110)

**CITY OF MORENO VALLEY
CONDITIONS OF APPROVAL**

**PA12-0015 (Tentative Parcel Map 36457 for a 26 Parcel Financing Map for the
WLC Project)**

**APNs: 422-070-006, -010, -017, -018, -019, -020-,022, 422-080-001 thru 422-080-004,
422-110-001, 422-130-001 thru 422-130-003, 478-210-054 & -055, 478-230-001 thru -
007, -009 thru -011, -014,-019, -020, 478-240-005 thru -008, -011, -017, -019, -024
thru -030, 488-350-003 thru -010, -015, -019, -021, -023, and -025
05.18.15**

FINANCIAL & MANAGEMENT SERVICES DEPARTMENT

Special Districts Division

Acknowledgement of Conditions

The following items are the Special Districts Division's Conditions of Approval for project **PA12-0015**; this project shall be completed at no cost to any Government Agency. All questions regarding the following including but not limited to intent, requests for change/modification, variance and/or request for extension of time shall be sought from the Special Districts Division of the Financial & Management Services Department 951.413.3480 or by emailing specialdistricts@moval.org.

General Conditions

- SD-1 The Special Districts Division will condition the parcels associated with Tentative Parcel Map 36457 for all special financing districts applicable to the project when an application for development is submitted to the City for review.

**CITY OF MORENO VALLEY
CONDITIONS OF APPROVAL
Case No: PA12-0010, 0011, 0012, 0013, 0014, 0015 & 0016
TTM: 36457
Date: 05-07-2015**

PUBLIC WORKS DEPARTMENT

Moreno Valley Utility

Note: All Special Conditions, Modified Conditions, or Clarification of Conditions are in bold lettering. All other conditions are standard to all or most development projects.

Acknowledgement of Conditions

The following items are Moreno Valley Utility's Conditions of Approval for project PA12-0010, 0011, 0012, 0013, 0014, 0015 & 0016; this project shall be completed at no cost to any Government Agency. All questions regarding Moreno Valley Utility's Conditions including but not limited to, intent, requests for change/modification, variance and/or request for extension of time shall be sought from Moreno Valley Utility (the Electric Utility Division) of the Public Works Department 951.413.3500. The applicant is fully responsible for communicating with Moreno Valley Utility staff regarding their conditions.

PRIOR TO ENERGIZING MVU ELECTRIC UTILITY SYSTEM AND CERTIFICATE OF OCCUPANCY

- MVU-1 (R) For single family subdivisions, a three foot easement along each side yard property line shall be shown on the final map and offered for dedication to the City of Moreno Valley for public utility purposes, unless otherwise approved by the City Engineer. If the project is a multi-family development, townhome, condominium, apartment, commercial or industrial project, and it requires the installation of electric distribution facilities within common areas, a non-exclusive easement shall be provided to Moreno Valley Utility to include all such common areas. All easements shall include the rights of ingress and egress for the purpose of operation, maintenance, facility repair, and meter reading.
- MVU-2 (BP) **City of Moreno Valley Municipal Utility Service – Electrical Distribution:** Prior to constructing the MVU Electric Utility System, the developer shall submit a detailed engineering plan showing design, location and schematics for the utility system to be approved by the City Engineer. In accordance with Government Code Section 66462, the Developer **shall** execute an agreement with the City providing for the installation, construction, improvement and dedication of the utility system following recordation of final map and concurrent with trenching operations and other subdivision

improvements so long as said agreement incorporates the approved engineering plan and provides financial security to guarantee completion and dedication of the utility system.

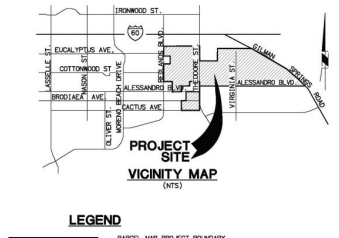
The Developer **shall** coordinate and receive approval from the City Engineer to install, construct, improve, and dedicate to the City, or the City's designee, all utility infrastructure (including but not limited to conduit, equipment, vaults, ducts, wires, switches, conductors, transformers, and "bring-up" facilities including electrical capacity to serve the identified development and other adjoining/abutting/ or benefiting projects as determined by Moreno Valley Utility) – collectively referred to as "utility system" (to and through the development), along with any appurtenant real property easements, as determined by the City Engineer to be necessary for the distribution and /or delivery of any and all "utility services" to each lot and unit within the Tentative Map. For purposes of this condition, "utility services" shall mean electric, cable television, telecommunication (including video, voice, and data) and other similar services designated by the City Engineer. "Utility services" shall not include sewer, water, and natural gas services, which are addressed by other conditions of approval.

The City, or the City's designee, shall utilize dedicated utility facilities to ensure safe, reliable, sustainable and cost effective delivery of utility services and maintain the integrity of streets and other public infrastructure. Developer shall, at developer's sole expense, install or cause the installation of such interconnection facilities as may be necessary to connect the electrical distribution infrastructure within the project to the Moreno Valley Utility owned and controlled electric distribution system.

- MVU-3 This project may be subject to a Reimbursement Agreement. The project may be responsible for a proportionate share of costs associated with electrical distribution infrastructure previously installed that directly benefits the project. Payment shall be required prior to issuance of building permits.
- MVU-4 For all new projects, existing Moreno Valley Utility electrical infrastructure shall be preserved in place. The developer will be responsible, at developer expense, for any and all costs associated with the relocation of any of Moreno Valley Utility's underground electrical distribution facilities, as determined by Moreno Valley Utility, which may be in conflict with any developer planned construction on the project site.

PARCEL SUMMARY

Table with 3 columns: Parcel #, Gross Ac., Net Ac. listing parcels 1 through 26.

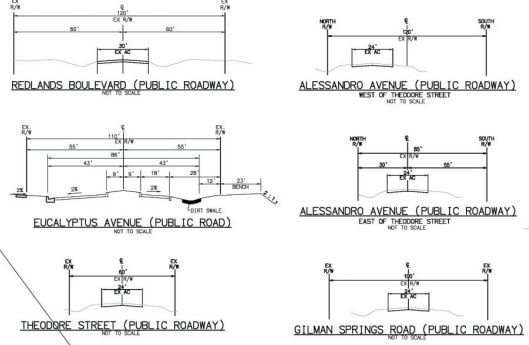


Legend defining symbols for parcel boundaries, proposed lot lines, and existing easements.

Data table with columns: BEARING/DICTION, RADIUS, LENGTH, listing specific survey data points.

TENTATIVE PARCEL MAP NO. 36457 TOTAL ACRES: 1,539.2 PREPARED: APRIL 2015 FOR FINANCE AND CONVEYANCE PURPOSES ONLY

ASSessor's PARCEL NUMBER: 422-070-006, 010, 017, 018, 019, 020, 021, 022... 488-300-003 THRU 010, 015, 019, 021, 023, 025



EASEMENT NOTES:

- 1. AN EASEMENT FOR PIPE LINES AND INCIDENTAL PURPOSES, RECORDED JANUARY 10, 1958 IN BOOK 2260... 2. AN EASEMENT FOR PIPE LINES AND INCIDENTAL PURPOSES, RECORDED FEBRUARY 25, 1958 IN BOOK 2238... 3. AN EASEMENT FOR PIPE LINES AND INCIDENTAL PURPOSES, RECORDED JANUARY 17, 1959 IN BOOK 2238...

EASEMENT NOTES:

- 1. AN EASEMENT FOR PIPE LINES AND INCIDENTAL PURPOSES, RECORDED JANUARY 10, 1958 IN BOOK 2260... 2. AN EASEMENT FOR PIPE LINES AND INCIDENTAL PURPOSES, RECORDED FEBRUARY 25, 1958 IN BOOK 2238... 3. AN EASEMENT FOR PIPE LINES AND INCIDENTAL PURPOSES, RECORDED JANUARY 17, 1959 IN BOOK 2238...

LEGAL DESCRIPTION

TOGETHER WITH LOTS 1 THROUGH 4 OF BLOCK 1 AND LOTS 1 THROUGH 4 OF BLOCK 2 AS SHOWN BY MAP NO. 1 BEAR VALLEY AND ALESSANDRO DEVELOPMENT COMPANY, INC. IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS FOR MAP RECORDED IN BOOK 11, PAGE 10 OF MAPS...

GENERAL NOTES:

- 1. THE BASIS OF THIS MAP IS A PRELIMINARY TITLE REPORT PREPARED BY FIRST AMERICAN TITLE INSURANCE COMPANY UNDER ORDER NO. NS-25270, DATED FEBRUARY 10, 2015 (INCLUDES THIS AND OTHER PROPERTIES), NO RESPONSIBILITY AS TO THE ACCURACY OF SAID REPORT IS ASSUMED BY THIS MAP...

Packet Pg. 610

A.1.1

ORDINANCE NO. 901

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF MORENO VALLEY, CALIFORNIA, APPROVING PA12-0011 (DEVELOPMENT AGREEMENT) FOR THE WORLD LOGISTICS CENTER PROJECT COVERING REAL ESTATE HIGHLAND FAIRVIEW HAS LEGAL OR EQUITABLE INTEREST IN, ON APPROXIMATELY 2,263 ACRES, WITHIN THE WORLD LOGISTICS SPECIFIC PLAN AREA (2,610 ACRES), INTENDED TO BE DEVELOPED AS HIGH CUBE LOGISTICS WAREHOUSE AND RELATED ANCILLARY USES GENERALLY LOCATED EAST OF REDLANDS BOULEVARD, SOUTH OF STATE ROUTE 60, WEST OF GILMAN SPRINGS ROAD AND NORTH OF THE SAN JACINTO WILDLIFE AREA.

The City Council of the City of Moreno Valley does ordain as follows:

SECTION 1: RECITALS

1.1 Pursuant to the provisions of law, public hearings were held before the City of Moreno Valley Planning Commission on June 11, 25, and 30, 2015 and the City Council on July 15, 2015.

1.2 The matter was fully discussed and the public and other agencies presented testimony and documentation.

1.3 The development agreement is attached hereto and incorporated herein as Exhibit A.

SECTION 2: FINDINGS

2.1 Based upon substantial evidence presented to this City Council during the above-referenced meeting on July 15, 2015, including written and oral staff reports, and the record from the public hearing, this City Council hereby specifically finds as follows:

1. **Conformance with General Plan Policies** – The development agreement is consistent with the General Plan, and its goals, objectives, policies and programs.

FACT: The Development Agreement is tied to the development project known as the World Logistic Center Specific Plan located in eastern Moreno Valley, and is covered by the proposed General Plan Amendment that will designate 2,610 acres for primarily logistics development and 1,104 acres for permanent open space and approximately 104 acres within the project area will be used for off-site improvements to serve the World Logistics Center project. Within the total project area, 2,610 acres are included in the proposed World Logistics Center Specific Plan which will contain

approximately 2,420 acres (including Logistics Development and Light Logistics zoned areas) for proposed logistics and or industrial warehouse land uses, 74.3 acres of the Open Space and 115.8 acres designated for roadway rights of way. Within the Specific Plan area, up to 40.4 million square feet of future high-cube logistics uses are proposed in the LD “Logistics Development” designation, as well as 200,000 square feet of warehouse and related uses to be included in the “Light Logistics” designation.

2. **Conformance with Zoning Regulations/Land Use Districts –** The development agreement is compatible with the uses authorized in, and the regulations prescribed for, the land use district in which the real property is located.

FACT: The Development Agreement is compatible with all applicable zoning regulations and conforms with modifications proposed for land use and zoning within the General Plan Amendments, Change of Zone and Specific Plan for the project known as the World Logistics Center Specific Plan. The proposed Specific Plan, General Plan Amendment and Change of Zone will change existing land uses in the project area to Logistics Development (LD), Light Logistics (LL), and Open Space (OS).

3. **Public Convenience, General Welfare and Good Land Use Practice –** The development agreement is in conformity with public convenience, general welfare and good land use practice.

FACT: The World Logistics Center project and this associated Development Agreement are in conformance with public convenience, general welfare and overall good land use practice. The Development Agreement includes negotiated public benefits more specifically summarized as Exhibit A-3 of the Development Agreement (Exhibit A).

4. **Health, Safety and Welfare –** The development agreement will not be detrimental to the public health, safety or welfare or materially injurious to properties or improvements in the vicinity.

FACT: An Environmental Impact report (EIR) has been prepared for the overall project and includes the Development Agreement. The EIR is a program document and subsequent project level environmental analysis will be performed, as required. A Statement of Overriding Considerations has been prepared and adopted by the City Council for the World Logistics Center project to address those impacts identified that cannot be reduced to less than significant levels. Said EIR has been certified. Said EIR includes a Mitigation Monitoring Program, which will ensure the completion of required mitigation measures for the project.

Provisions have been included in the Development Agreement to ensure development of the requisite fire station, with equipment, in the project area. In addition, provisions have been included in the Development Agreement to provide air filtration equipment above and beyond the mitigation requirements of the project.

- 5. Orderly Development and Preservation of Property Values –**
The development agreement will not adversely affect the orderly development or the preservation of property values for the subject property or any other properties.

FACT: The Development Agreement for the project would not adversely affect development or preservation of property values for the subject project site. The proposed development and specific plan will allow future industrial development in phases and provide orderly development. The proposed land use of Business Park is consistent with a large portion of land included in the current Moreno Highlands Specific Plan, which provided for 361 acres of Business Park land use. The project, consistent with the City's current Economic Development Action Plan will assist with the jobs housing balance in the region, reduce residential zoned property and have the potential to provide for future jobs. Provisions in the Development Agreement have been included to ensure enhanced public benefits in promoting local hiring, training, and workforce development.

The WLC Specific Plan includes design standards such as a circulation system that limits truck traffic access in the Plan area to primarily Theodore Street (from Highway 60) and Gilman Springs Road and away from existing residential neighborhoods to the west of the project site. Additional passenger car access would be allowed from Cactus Avenue with trucks prohibited from that route. All motor vehicle access along Alessandro Boulevard from the west would be prohibited, with allowance for pedestrian and bicycle access only. The Specific Plan also provides special edge treatment areas surrounding the perimeter of the proposed World Logistics Center Specific Plan boundary that provides a 250 foot setbacks or greater between the Specific Plan development area and adjacent areas along Gilman Springs Road, Redlands Boulevard, and the San Jacinto Wildlife Area

SECTION 3: ADOPTION

Based on the foregoing recitals and findings, the City Council of the City of Moreno Valley does hereby adopt and approve the Development Agreement attached

hereto as Exhibit A, and does hereby authorize the Mayor to sign the development agreement on behalf of the City.

SECTION 4: EFFECT OF ENACTMENT:

Except as specifically provided herein, nothing contained in this ordinance shall be deemed to modify or supersede any prior enactment of the City Council which addresses the same subject addressed herein.

SECTION 5: NOTICE OF ADOPTION:

Within fifteen days after the date of adoption hereof, the City Clerk shall certify to the adoption of this ordinance and cause it to be posted in three public places within the city.

SECTION 6: EFFECTIVE DATE:

This ordinance shall take effect thirty days after the date of its adoption.

APPROVED and ADDOPTED this _____ day of _____, 2015.

Mayor of the City of Moreno Valley

ATTEST:

City Clerk

APPROVED AS TO FORM:

City Attorney

Attachment: Proposed Ordinance_Development Agreement [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

ORDINANCE JURAT

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF MORENO VALLEY)

I, Jane Halstead, City Clerk of the City of Moreno Valley, California, do hereby certify that Ordinance No. 901 had its first reading on July 15, 2015 and had its second reading on _____, _____, and was duly and regularly adopted by the City Council of the City of Moreno Valley at a regular meeting thereof held on the _____ day of _____, _____ by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

(Council Members, Mayor Pro Tem and Mayor)

CITY CLERK

(SEAL)

Attachment: Proposed Ordinance_Development Agreement [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

Recording Requested by And
When Recorded Return to:

City of Moreno Valley
14177 Frederick Street
Moreno Valley, CA 92552
Attn: City Clerk

[Exempt From Recording Fee Per Gov. Code § 27383]

DEVELOPMENT AGREEMENT

(World Logistics Center)

This DEVELOPMENT AGREEMENT (“Agreement”) is entered into as of this ____ day of _____, 2015, by and between the CITY OF MORENO VALLEY, a California general law municipal corporation (“City”), and HF PROPERTIES, a California general partnership, SUNNYMEAD PROPERTIES, a Delaware general partnership, THEODORE PROPERTIES PARTNERS, a Delaware general partnership, 13451 THEODORE, LLC, a California limited liability company, and HL PROPERTY PARTNERS, a Delaware general partnership (collectively “HF”). The City and HF hereafter are referred to collectively as the “Parties” and individually as a “Party.”

RECITALS

A. Consistent with the City’s economic development and general plan, the City and HF have agreed to enter into this Agreement because the World Logistics Center will be a master planned business park specifically designed to support large global companies and their business and logistics operations which will be a significant revenue generating, job creating and training/education project as further detailed in Exhibit A-3.

B. The City is authorized to enter into development agreements with persons having legal or equitable interests in real property for the development of such property pursuant to California State general laws: Article 2.5 of Chapter 4 of Division I of Title 7 of the California Government Code commencing with section 65864 (the “Development Agreement Law”), and Article XI, Section 7, of the California Constitution, together with City ordinances.

C. The City has enacted an ordinance, codified and set forth in the Moreno Valley Municipal Code as Title 9, Section 9.02.110 (the “Development Agreement Ordinance”) that establishes the procedures and requirements for its consideration of such development agreements upon application by, or on behalf of, persons having legal or equitable interests in real property pursuant to the Development Agreement Law.

D. HF represents and hereby warrants that it has a legal and equitable interests in approximately two thousand, two hundred sixty three (2263) acres of real property located in the region commonly referenced as the Rancho Belago area of the City, as described in the legal

description set forth in Exhibit “A-1” and as illustrated in the depiction set forth in Exhibit “A-2” (the “Subject Property”). The City has been provided proof of the records HF relies upon for the representation and warranty by HF. City is relying upon this evidence and considers it to be an element of HF’s consideration for this Agreement.

E. In clarification of the foregoing the Subject Property includes approximately 85 acres, as described on Exhibit “A-1” and depicted in Exhibit “A-2” that is currently located in an unincorporated area of Riverside County but is proposed by HF to be annexed to the City within five years, subject to the process and approval of the Riverside County Local Area Formation Commission (the “Annexation”).

F. The World Logistics Center Specific Plan (“WLCSP”) allows the development of approximately forty million, six hundred thousand (40,600,000) square feet of industrial, logistics, warehouse and support use on the land subject to the WLCSP. The Development, as hereinafter defined, includes both HF improvements to the subject property and City entitlements, including but not limited to, a General Plan Amendment, adoption of the WLCSP, a Zone Change, Tentative Parcel Map 36457 and annexation of an 85-acre parcel along Gilman Springs Road. The Development, including the Project, as defined herein, will also include subdivision maps and other approvals needed to construct the facilities proposed for the Subject Property. The permitted uses of the Subject Property, including a plan of development, the density and intensity of use, the maximum height and size of proposed buildings are set forth in the WLCSP, as it may be amended from time to time, and are hereby incorporated by reference. The City’s certification of the Environmental Impact Report, approval of the General Plan Amendment, adoption of the WLCSP, adoption of the Zone Change, approval of the Tentative Parcel map are conditions precedent to this Agreement.

G. The development of the Subject Property will generate a variety of public benefits to the City, its residents, property owners, taxpayers and surrounding communities. The Project is believed to substantially advance the goals of the City’s adopted Economic Development Action Plan, expand and improve the City’s property and sales tax base, invest significant private capital into the local economy, generate extensive construction employment and new permanent employment opportunities for Moreno Valley and the region, and help to reduce the severe jobs to housing imbalance that currently exists in the City. Among the public benefits, the development of this Project pursuant to the WLCSP will implement goals, objectives and policies of the City’s General Plan, and the WLCSP, which will provide logistics development, public utility and open space uses for the Subject Property and for the City. In exchange for the duties and obligations imposed by this Agreement, HF will receive the vested right to develop the Subject Property for the Term in accordance with the terms of this Agreement.

H. The City has previously adopted the Economic Development Action Plan (“EDAP”). The WLCSP responds to a portion of the EDAP. The eastern portion of Moreno Valley is deficient in the infrastructure necessary to support and implement the City’s EDAP. To allow for the development of the World Logistics Center and the WLCSP, HF is willing to provide and assist the City in the development of infrastructure in support of the City’s economic plan which may be in excess of HF’s fair share and therefore may provide broader benefits. The City and HF desire to ensure that all beneficiaries of the Infrastructure Improvements will pay their fair share per the Municipal Code. Therefore this Agreement includes reference to the

City’s usual method for reimbursement to an owner for the amount of the costs of such Infrastructure Improvements which exceeds the fair share of those costs and accrues to the benefit of other owners.

I. On _____, 2015, the Planning Commission of the City, at a duly noticed public hearing, recommended, in Resolution _____, that the City Council certify the Environmental Impact Report (SCH # 2012021045) (the “EIR”). The Planning Commission also recommended that the City Council approve General Plan Amendment _____, the WLCSP, the Annexation, Zone Change No. _____ and Tentative Parcel Map 36457.

J. On _____, 2015, the City Council of the City, at a duly noticed public hearing held pursuant to all legal preconditions, adopted Resolution No. _____ certifying the EIR for the Project and the related Mitigation Monitoring and Reporting Program and also (i) adopted Resolution _____ approving General Plan Amendment No. _____, (ii) adopted Resolution _____ approving Tentative Parcel Map 36457, (iii) adopted Resolution _____ approving the Annexation, (iv) introduced for first reading Ordinance No. _____ approving the WLCSP, and (v) introduced, for first reading Ordinance No. _____ approving Zone Change No. _____. The WLCSP and Zone Change No. _____ were subsequently adopted on _____, 2015 and effective on _____.

K. The Planning Commission of the City, at a duly noticed public hearing held pursuant to the Development Agreement Law and the Development Agreement Ordinance, recommended that the City Council find and determine, among other things, that this Agreement is consistent with the goals, objectives, policies, general land uses and programs specified in the City General Plan, as amended by the Project Approvals; is compatible with the uses authorized in and the land use regulations prescribed by the City in its Zoning Code; and will promote and encourage the development of the Subject Property by providing a greater degree of certainty with respect thereto, while also providing specified public benefits to the City.

L. On _____, 2015, after a duly noticed public hearing held pursuant to the Development Agreement Law and the Development Agreement Ordinance, the City Council of the City approved the introduction of Ordinance No. _____ (the “Enacting Ordinance”) that would approve and adopt this Agreement and authorize its execution on behalf of the City. On _____, 2015, the City Council of the City adopted the Enacting Ordinance.

M. The Parties intend that HF will proceed with the Development upon the Subject Property pursuant to this Agreement within the Term.

AGREEMENT

NOW, THEREFORE, in consideration of the above recitals which are incorporated herein and intended to assist with the interpretation of this Agreement, and of the mutual covenants hereinafter contained and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the City and HF agree as follows:

Attachment: Exhibit A to Proposed Ordinance_ Development Agreement (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

ARTICLE 1 DEFINITIONS.

The following terms when used in this Agreement shall, unless defined elsewhere in this Agreement, have the meanings set forth below:

1.1 “Agreement” shall mean this Development Agreement by and between the City and HF and any subsequent amendments.

1.2 “City” shall mean the City of Moreno Valley, a municipal corporation, organized and existing under the general laws of the State of California.

1.3 “City Council” shall mean the governing body of the City.

1.4 “Development” shall mean the improvement of the Subject Property for the purposes of completing the structures, improvements and facilities composing the Project, including but not limited to: grading; the construction of infrastructure related to the Project whether located within or outside the Subject Property; the construction of buildings and structures; construction of post-development storm drain related improvements and the installation of landscaping and public facilities and improvements. “Development” also includes the maintenance, repair, reconstruction, modification, or redevelopment of any building, structure, improvement, landscaping, or facility after the construction and completion thereof on the Subject Property. The Development shall at all times conform to the Agreement.

1.5 “Development Impact Fee,” “Development Impact Fees” or “DIF” means for purposes of this Agreement only those fees imposed pursuant to Moreno Valley Municipal Code Sections 3.42.070 (police facilities), 3.42.080 (City hall facilities), 3.42.090 (corporate yard facilities) and 3.42.100 (maintenance equipment). The term “Development Impact Fees” (or “DIF”) does not include those fees imposed by Moreno Valley Municipal Code Sections 3.42.030 (arterial streets), 3.42.040 (traffic signals), 3.42.050 (interchange improvements) and 3.42.060 (fire facilities).

1.6 “Development Plan” shall mean the plan for Development of the Subject Property pursuant to the Existing Regulations and including the Infrastructure Improvements.

1.7 “Development Requirement(s)” shall mean any fees or requirement(s) of the City imposed in connection with or pursuant to the Project Approvals such as the construction or improvement of public facilities or the payment of fees or assessments in order to lessen, offset, mitigate or compensate for the impacts of the Development.

1.8 “Effective Date” shall mean the date that is ninety (90) days after the date the City Council adopts the Enacting Ordinance unless litigation is commenced in which case the Effective Date shall mean the date on which the litigation is finally terminated, whether by dismissal which leaves all of the Project Approvals in place or by the entry of a final judgment, free from further appellate review, which upholds the Project Approvals. Notwithstanding the forgoing, Article 7 shall be immediately effective thirty one (31) days after the date the City Council adopts the enacting ordinance.

1.9 “Enacting Ordinance” shall mean the City Council adopted ordinance described in Recital K of this Agreement.

1.10 “Existing Regulations” shall mean the Project Approvals, Development Requirements, and all ordinances, resolutions, codes, rules, regulations and official policies of City, adopted and effective on the date of the adoption of the Enacting Ordinance governing Development and use of the Subject Property, including but not limited to the permitted use of land, the density or intensity of use, the maximum height and size of proposed building, and the architectural design, improvement and construction standards and specifications applicable to the Development of the Subject Property. The City shall compile two sets of the Existing Regulations. Once that compilation has been completed by the City, one set will be stored with the Agreement by the City Clerk for future use and certainty of requirements and the other set will be given to HF.

1.11 “HF” shall mean HF PROPERTIES, SUNNYMEAD PROPERTIES, THEODORE PROPERTIES PARTNERS, 13451 THEODORE, LLC and HL PROPERTY PARTNERS, and/or its successors or assigns to all or any portion of the Subject Property

1.12 “Infrastructure Improvements” shall mean all public infrastructure improvements on and off the Subject Property.

1.13 “Judgment(s)” shall mean one or more final or interim judgment(s) of a court of competent jurisdiction affecting the rights of the Parties hereunder.

1.14 “Moreno Valley Municipal Code” shall mean the City’s Municipal Code in effect on the date of the adoption of the Enacting Ordinance.

1.15 “Mortgagee” shall mean a mortgagee of a mortgage, a beneficiary under a deed of trust or any other security device, a lender, or each of their respective successors and assigns.

1.16 “Parcel” shall mean any lot created by a recorded subdivision or parcel map.

1.17 “Project” shall mean the Development and operation of the Subject Property pursuant to and consistent with the Development Plan and the provisions of this Agreement.

1.18 “Project Approvals” shall mean, collectively, General Plan Amendment No. _____, the WLCSP, Zone Change No. _____, the Annexation and Tentative Parcel Map 36457.

1.19 “Subject Property” shall mean that certain real property consisting of the property more particularly described in Exhibit “A-1” attached hereto and depicted on Exhibit “A-2” attached hereto, any real property subject to the WLCSP acquired by HF after the date on which the Enacting Ordinance is adopted and all real property intended to be included by the Annexation. Until the Annexation is finally accomplished by HF at its sole cost and expense, nothing in this Agreement shall apply to the property to be annexed.

1.20 “Subsequent Development Approvals” shall mean any and all ministerial and/or discretionary permits, licenses, consents, rights and privileges, and other ministerial and/or discretionary actions approved or issued by City in connection with Development of the Subject

person, partnership, joint venture, firm or corporation at any time during the Term of this Agreement; provided, however, that any such sale, transfer or assignment (collectively, "Assignment") shall include the assignment and assumption of the rights, duties and obligations arising under or from this Agreement be made in strict compliance with the following conditions:

(a) No assignment of any right or interest under this Agreement shall be made unless made together with the assignment of all or the concomitant part of the Subject Property.

(b) Prior to any such Assignment, HF shall provide City with an executed agreement, in a form reasonably acceptable to City, by the purchaser, transferee or assignee (collectively, "Assignee") and providing therein that the Assignee expressly and unconditionally assumes all the duties and obligations of HF under this Agreement with respect to the portion of the Subject Property being transferred. City shall have the sole power to allocate, prorate, or otherwise apportion any term, provision, fee, contribution, or similar duty or obligation of HF, so that City, HF, and assignee have a specific agreement as to the duties and obligations, of all Parties after the Transfer.

(c) Any Assignment of this Agreement will require the prior written consent of the City, which will not be unreasonably withheld or delayed. The City's approval will be based upon the City's reasonable determination, in accordance with the standard set forth in Section 3.4.1(d) as to whether or not such Assignee has the requisite ability to complete the portion of the Subject Property being transferred. Within thirty (30) days following receipt by the City of written notice regarding Assignment (such notice must include development experience information regarding the Assignee sufficient to allow the City to make the above determination) the City will notify HF regarding its approval or disapproval of such Assignment. Failure of the City to respond in writing within thirty (30) days of receipt of the notice of the Assignment shall constitute approval of the assignment.

Any Assignment not made in compliance with the foregoing conditions shall result in HF continuing to be responsible for all obligations under this Agreement. Notwithstanding the failure of any Assignee to receive City approval and/or execute the Agreement required by subparagraph (c) above, the burdens of this Agreement shall be binding upon such Assignee, but the benefits of this Agreement including but not limited to DIF, shall not inure to such Assignee until and unless such Assignment is approved by the City and executed.

3.4.1 Release of HF. Notwithstanding any Assignment, HF shall continue to be obligated under this Agreement unless HF is given a release in writing by City, which release shall be provided by City upon the full satisfaction by HF of the following conditions:

(d) HF no longer has a legal or equitable interest in the portion of the Subject Property being transferred other than a lien on the portion of the Subject Property being transferred to secure the payment of the purchase price to HF. HF shall provide the City written notice to the City of the party to which the lien is to be transferred, upon transfer of the lien, pursuant to this Article 3.

(e) HF is not then in default under this Agreement in City's sole reasonable determination, subject to procedure set forth in Section 5.2 of this Agreement.

(f) HF has provided City with the notice and executed agreement and other information required under subparagraphs (b) and (c) of Subsection 3.4 above.

(g) The City has reviewed and approved the Assignee and the Assignment, such approval to include a determination by the City that the Assignee has the requisite ability to complete the portion of the Subject Property being transferred.

(h) The Assignee provides City with security equivalent to any security previously provided by HF to secure performance of its obligations hereunder with respect to the portion of the Subject Property being transferred. The City shall cooperate with HF to effectuate the substitution of security provided by HF to that to be provided by the Assignee with respect to the portion of the Subject Property being transferred.

(i) HF has paid City all monies then due and owing to City under this Agreement.

3.4.2. Subsequent Assignment. Any subsequent Assignment after an initial Assignment shall be made only in accordance with and subject to the terms and conditions of this Article. All subsequent Assignors must deliver written acknowledgement of this Agreement, and the Assignees duties under the Agreement or the City may, in its sole discretion, terminate this Agreement as to that owner's parcel(s).

3.4.3. Termination of Agreement With Respect to Individual Parcels upon Sale and Completion of Construction. Notwithstanding any other provisions of this Agreement, this Agreement shall terminate with respect to any Parcel and such Parcel shall be released and no longer be subject to this Agreement without the execution or recordation of any further document upon satisfaction of the following conditions:

(a) The Parcel has been finally subdivided and sold or leased for a period longer than one year to a member of the public or other ultimate user; and,

(b) A Certificate of Occupancy has been issued for each structure on the Parcel shown on the plot plan required by Section 11.3.2 of the WLCSP, and the fees set forth under this Agreement have been paid.

(c) The Parcel has no duty to contribute monies or render performance under this Agreement.

3.5 Term. Unless earlier terminated as provided in this Agreement, this Agreement shall continue in full force and effect until the earlier of (i) the date of completion of the last portion of the Development, or (ii) the date that is fifteen (15) years from and after the Effective Date of this Agreement unless Certificates of Occupancy have been granted by the City for buildings on the Subject Property consistent with the Development Plan for not less than twelve-million (12,000,000) square feet (gross floor area as defined by Moreno Valley Municipal Code 9.15.030) in which event the Term shall be extended for an additional ten (10) years, subject to

extension pursuant to Section 11.9 below (the “Term”). Alternatively, if HF is, for any reason, unable to obtain Certificates of Occupancy for not less than eight (8) million square feet, and up to twelve million (12,000,000) square feet within the original fifteen (15) year Term, it shall be entitled to have this Agreement extended for an additional ten (10) years, subject to extension pursuant to Section 11.9 below, upon the payment to the City of one million dollars (\$1,000,000) prior to the expiration of the original fifteen (15) year term.

3.6 City Cooperation.

(a) In anticipation of the effort necessary to facilitate the timely processing and permitting of project improvements, HF may request the City to designate a mutually agreeable individual (the “City’s WLC Coordinator”) who shall have the authority to facilitate and coordinate development services within the City and with HF for all actions to be taken by the City which are needed for the development of the Project, including, but not limited to, discretionary approvals, entitlements, site plans, grading, building and occupancy permit applications and inspections through the City’s review and approval processes, all at the full cost of HF, which HF shall pay in advance and replenish upon City’s request, from time to time. If any payments are not received by City when requested, the WLC coordinator shall cease acting until the funds are received and normal City protocols shall govern. All applications submitted to the City shall be evaluated for completeness within twelve (12) working days of receipt by the City. If not complete, the City shall immediately ensure that HF is notified of what additional information is required.

(b) Upon receipt of an application deemed complete pursuant to subsection 3.6(a) above for a site, grading, building, occupancy, or similar permit, the City shall process, review and approve or disapprove the application within ten (10) working days for the first submittal and within ten (10) working days of any subsequent submittals.

(c) It shall be the City’s WLC Coordinator’s responsibility to ensure that all of the time limits set forth above are met.

(d) The Project shall, pursuant to ordinary procedures, participate in the City’s “Time and Materials Fee Program” which is designed to ensure that the City is reimbursed by HF for its actual costs of providing discretionary approvals, entitlements, planning, grading, and building permits and inspections and fire prevention services. For convenience this shall include the payments due under sub sections 3.6(a) and 3.6(e).

(e) The City shall, pursuant to City’s standard contracting procedures, maintain on-call contracts with at least three qualified entities or persons, mutually acceptable to both the City and HF, who can be called upon to immediately provide the services set forth above when the City’s WLC Coordinator determines that the City, utilizing typical city staff resources, is unlikely to be able to meet the time limits set forth above. HF shall be solely responsible for the cost of using the qualified private entities or persons. HF shall deposit with City a sum City then determines necessary for such consultants, immediately upon written request from City. HF shall replenish such funds, from time to time, upon written request from City. If any funds are not received per City’s request, the consultants shall, without liability, cease work until such money is received.

(f) The City's WLC Coordinator shall cooperate with HF in obtaining any permits or approvals needed from any other agency at full cost to HF.

(g) The City, at HF's request, shall meet with HF to consider in good faith, economic incentives sought by HF similar to those approved for logistics projects in other areas of the City after the Effective Date.

3.7 Time of the Essence. The Parties expressly acknowledge and agree that time is of the essence in the performance of the provisions of this Agreement.

3.8 Mutual Waiver of Estoppel Defenses by Parties. Notwithstanding any legal authorities to the contrary concerning the doctrines of waiver and estoppel as applied to public entities and the actions or inactions of public agencies or public agency officers and officials, the Parties acknowledge and agree that each party and its successors and assigns to all or any interest in the Subject Property are relying upon the contents of this Agreement and the Parties' execution of this Agreement and the recordation hereof, and that in consideration of such material reliance, each party shall now be estopped from denying the underlying validity of this Agreement and each party knowingly and expressly waives any such claim or defense.

ARTICLE 4 DEVELOPMENT OF THE PROPERTY.

4.1 Vested Right to Develop. During the Term, HF or its Assignee, shall have a vested right to develop the Subject Property in accordance with the Existing Regulations, and as subject to the provisions of this Agreement.

4.2 Effect of Agreement on Land Use Regulations. Except as otherwise provided under the terms of this Agreement, the rules, regulations and official policies governing permitted uses of the Subject Property, the density and intensity of use of the Subject Property, the maximum height and size of proposed buildings, and the design, improvement, and construction standards and specifications applicable to Development of the Subject Property, shall be only the Existing Regulations and those contained in the Development Plan.

4.3 Subsequent Development Approvals. When required by the Moreno Valley Municipal Code, the City shall accept for processing, review and take action upon all properly filed applications for Subsequent Development Approvals. The City further agrees that, unless otherwise requested by HF, the City shall not amend or rescind any Subsequent Development Approvals after such approvals have been granted by the City except as otherwise provided for in Title 9 of the City Municipal Code, or as directed by court order, or as related to approvals not granted by the City. Any Subsequent Development Approval, when granted, shall be deemed to be part of the Existing Regulations from the date of approval except as mandated by court order, or as specified in approvals not granted by the City.

4.4 Timing of Development. HF represents that it intends to commence and complete the physical improvements specified in the Development Plan for the Project. HF cannot specify the specific timing of development. HF will use its best efforts to commence construction at the earliest possible date consistent with market conditions. Because the California Supreme Court held in *Pardee Construction Co. v. City of Camarillo* (1984) 37 Cal.3d 455, that the failure of the parties therein to provide for the timing of development resulted in a latter adopted initiative

restricting the timing of development to prevail over such parties' agreement, it is the Parties' intent to cure that deficiency by expressly acknowledging and providing that HF shall have the right to develop the Subject Property at its own timing. In addition, to the extent HF decides to proceed with the Development of the Subject Property, City shall cooperate with HF with respect to the improvement of the Development of the Subject Property. If HF determines, in its sole and absolute discretion, to develop portions or phases of the Project, the City shall allow the phasing of public improvements unless the City determines that generally applied City of Moreno Valley Municipal engineering or planning requirements demand that additional or complete public improvements be made. The public improvements to be provided would be only those needed to serve the portion or phase being developed consistent with the environmental analysis which shall demonstrate to the City that the public improvements to be provided would be only those needed to serve the portion or phase being developed.

4.5 Terms of Maps and Other Project Approvals. Pursuant to California Government Code Sections 66452.6(1) and 65863.9, the term of any subdivision or parcel map that may be processed on all or any portion of the Subject Property and the term of each of the development approvals, including Tentative Parcel Map 36457, and any Subsequent Development Approvals, shall be extended until the expiration of the Term.

4.6 Changes and Amendments. The Parties acknowledge that although Development of the Project may require Subsequent Development Approvals, such Development shall be in compliance with this Agreement including the Development Plan. The above notwithstanding, HF may determine that changes are appropriate and desirable in the existing Project Approvals or Development Plan. In the event HF finds that such a change is appropriate or desirable, HF may apply in writing for an amendment to the existing Project Approvals or the Development Plan to effectuate such change. The City shall review and process any request for an amendment in the same manner that it would review and process a similar request for an amendment from any other owner of commercial or industrial land in similar circumstances. Any amendment to the Project Approvals or the Development Plan, when granted, shall be deemed to be part of the Existing Regulations from the date of the grant. Such amendments shall not be unreasonably withheld.

4.7 Reservation of Authority.

4.7.1. Limitations, Reservations and Exceptions. Notwithstanding any other provision of this Agreement, the following Subsequent Regulations shall apply:

(a) Procedural regulations consistent with this Agreement relating to hearing bodies, petitions, applications, notices, findings, records, hearing, reports, recommendations, appeals and any other matter of procedure subject to the City's obligations under Section 3.6, and as may be the subject to future general law enactments by the State of California.

(b) Changes adopted by the International Code Council, or other similar body, as part of the then most current versions of the California Building Code, Uniform Fire Code, Uniform Plumbing Code, Uniform Mechanical Code, or National Electrical Code, and also adopted by the City as Subsequent Regulations.

(c) Subsequent Regulations, not otherwise specified under this Section 4.7.1, that are not in conflict with the Existing Regulations and the Development Plan.

(d) Subsequent Regulations, not otherwise specified under this Section 4.7.1, that are in conflict with the Existing Regulations or the Development Plan provided HF has given written consent to the application of such regulations to Development of the Subject Property at HF's sole and absolute discretion.

(e) Increased DIF, as defined in Section 1.5 of this Agreement, which shall be paid in the amount of the DIF in effect at the time that they are to be paid.

(f) Judgment(s) and/or federal, state and county laws and regulations which the City is required to enforce as against the Subject Property or the Development of the Subject Property.

4.7.2. Further Future Discretion of City. This Agreement shall not prevent the City, in acting on Subsequent Development Approvals, from applying Subsequent Regulations allowed under Section 4.7.1. Further, it is also understood and acknowledged by the Parties that the Project Approvals contemplate that the City may be required, in certain circumstances, to undertake further environmental review of Subsequent Development Approvals. If the circumstances set forth in CEQA Guideline Section 15162 occur in the context of the City considering Subsequent Development Approvals, or if otherwise required by the EIR, the City is required to, and shall, without being subject to claim, assertion of breach or other challenge by HF or Assignee exercise the maximum discretion authorized by law, consistent with the terms of CEQA and this Agreement.

4.7.3. Modification or Suspension by Federal or State, County, or Multi-Jurisdictional Law. In the event that any Judgment(s) or federal, state, county, or multi-jurisdictional laws or regulations, enacted after the Effective Date of this Agreement, prevent or preclude compliance with one or more of the provisions of this Agreement, such provisions of this Agreement shall be modified or suspended as may be necessary to comply with such Judgment(s) or federal, state, county, or multi-jurisdictional laws or regulations, and this Agreement shall remain in full force and effect to the extent it is not inconsistent with such laws or regulations and to the extent such laws or regulations do not render such remaining provision impractical to enforce.

4.8 Payment of, and Reimbursement for, the Cost of Improvements Paid for by HF Which Are in Excess of HF's Fair Share. HF shall satisfy the requirements imposed by Mitigation Measure 4.15.7.4.A, as set forth in the EIR, to ensure that all of the Development's impacts on the City's circulation system, including, but not limited to, improvements to arterial streets, traffic signals and interchanges, are mitigated. Because HF will be responsible for paying for or constructing all circulation-related improvements, it shall not pay the fees imposed by Moreno Valley Municipal Code Sections 3.42.030 (arterial streets), 3.42.040 (traffic signals) and 3.42.050 (interchange improvements). City will provide to HF the reimbursement agreement(s) in the form and type as specified in Chapter 9.14 of Title 9 of the Moreno Valley Municipal Code.

4.9 Provision of a “turnkey” Fire Station. HF shall, at its own cost, provide a fully constructed, fully equipped fire station and fire station site, including fire trucks, as specified by the City’s Fire Chief. The fire station’s furniture and fixtures shall be reasonably comparable to those of the most recently completed fire station within the City. The fire station, equipment and trucks shall be provided as and when directed by the Fire Chief. Because HF will be responsible for the provision of the fire station, fire station site, equipment, and trucks, it shall not pay the fee imposed by Moreno Valley Municipal Code Section 3.42. 060 (fire facilities). City will provide to HF the reimbursement agreement(s) in the form and type as specified in Chapter 9.14 of Title 9 of the Moreno Valley Municipal Code.

4.10 City’s Provision of Public Infrastructure and Services. Except as otherwise prescribed in this Agreement and/or as required of the development through existing or future mitigation measures, development standards, and conditions of approval, the City shall provide the public infrastructure and services which are not HF’s responsibility as determined by the City with timing at the sole and absolute discretion of the City.

4.11 Local Hiring Program. HF will establish a WLC Local Hiring Program, at HF’s cost to identify, align, and facilitate educational interests and programs with workforce development programs that facilitate the hiring of Moreno Valley residents for job opportunities at the World Logistics Center, and associated jobs not directly at WLC, but in industries that support WLC. HF will require its contractors, suppliers and tenants to be active participants in Moreno Valley Employment Resource Center (“ERC”) programs including, but not limited to, the job opportunity announcement program. World Logistics Center employers will be requested to submit all job announcements to the ERC at least one week prior to providing such announcements to other agencies or to the general public. Potential employers will be requested to provide information regarding job opportunities to the ERC including details regarding job titles, minimum qualifications, application processes, and employer contact information. HF shall request that subsequent users to make good faith efforts to hire Moreno Valley City residents. HF shall, upon City’s request from time to time, provide to the City proof of its efforts under this section and the success of HF’s efforts. HF shall also participate with the Hire MoVal Incentive Program, which was adopted by the City Council on April 28, 2015, and as it may be amended from time to time.

4.12 Education/Innovation/Training/Library Funding.

The City and HF are especially interested in ensuring that the residents of Moreno Valley are provided education resources and obtain every opportunity to secure the jobs which will be created by the operation of the World Logistics Center. Toward that end, HF is willing to contribute six million, nine hundred and ninety three thousand dollars (\$6,993,000), to be used by the City to provide and enhance educational and workforce development training in the supply chain and logistics industries, as follows:

- (a) HF shall contribute no less than five million, two hundred sixty eight thousand dollars (\$5,268,000), one million dollars (\$1,000,000) to be contributed at the issuance of the first building permit for a logistics building on the Subject Property and \$0.11/square foot to be paid at the time of the issuance of the building permit for each succeeding building, excluding the fire station;

(b) In addition to the foregoing, beginning on the Effective Date and on each anniversary of that date thereafter, HF shall contribute to the City one hundred thousand dollars (\$100,000) per year for the next six (6) years; and

(c) In addition to the foregoing, beginning in the 7th year on the anniversary date of the Effective Date and continuing throughout the Term, HF shall contribute to the City one hundred twenty five thousand dollars (\$125,000) per year, on the specified anniversary date of the Effective Date, so long as this Agreement is in effect.

4.13 State Route 60 Landscape, Signage, Bridge Design Program. City shall set up a joint City/HF committee to develop freeway related landscaping, bridge architectural concepts, engineering and freeway signage regulations for SR-60 between Redlands Boulevard and Gilman Springs Road. The guidelines, concepts and regulations shall be developed in an expeditious manner. The City shall contribute up to Fifty Thousand Dollars (\$50,000) and HF shall match the City's contributions on a ten to one basis, up to Five-Hundred Thousand dollars (\$500,000).

4.14 Air Filtration Systems for Seven Properties at Theodore Street and Dracaea Avenue. Notwithstanding the findings of the EIR, Owner agrees to fund the installation of air filtration systems meeting ASHRSE Standard 52.2 MERV-13 standards at the locations listed below, not to exceed \$25,000 per property. Property owners shall be under no obligation to accept such offer. Prior to the issuance of the first construction permit within the WLCSP, Owner shall provide documentation to the City confirming that an offer has been extended to each of the owners of said properties, and \$175,000 shall be deposited in a City account designated for this purpose and an agreement regarding the use and distribution of funds shall be executed between City and Owner. The affected property owners shall have until December 31, 2021 to accept the offer. Upon acceptance of each offer, Owner shall work with each owner to ensure the filtration system is properly installed in a timely fashion. Owner shall invoice City for reimbursement of payments up to \$25,000 per property. This provision applies only to the following seven houses:

13100 Theodore Street, Moreno Valley, CA 92555 current APN: 422-070-029

13200 Theodore Street, Moreno Valley, CA 92555 current APN: 422-070-032

13241 Theodore Street, Moreno Valley, CA 92555 current APN: 478-220-014

29080 Dracaea Avenue, Moreno Valley, CA 92555 current APN: 478-220-030

29140 Dracaea Avenue, Moreno Valley, CA 92555 current APN: 478-220-009

30220 Dracaea Avenue, Moreno Valley, CA 92555 current APN: 422-070-035

30240 Dracaea Avenue, Moreno Valley, CA 92555 current APN: 422-070-037

ARTICLE 5 REVIEW FOR COMPLIANCE.

5.1 Periodic Review. The City shall review this Agreement annually, on or before the anniversary of the Effective Date, in order to ascertain the good faith compliance by HF with the terms of the Agreement. As part of that review, HF or its successor and assigns shall submit an annual monitoring review statement describing its actions in compliance with this Agreement, in a form acceptable to the Community Development Director or his/her authorized designee, within thirty (30) calendar days after written notice therefrom requesting such a statement. The statement shall be accompanied by an annual review and administration fee sufficient to defray the estimated costs of review and administration of the Agreement during the succeeding year. The amount of the annual review and administration fee shall be set by resolution of the City Council. No failure on part of the City to conduct or complete the review as provided herein shall have any impact on the validity of this Agreement. HF shall, for the first year, deposit \$1,000.00 on the Effective Date for the first year of review.

5.2 Procedure. Each Party shall have a reasonable opportunity to assert matters which it believes have not been undertaken in accordance with the Agreement, to explain the basis for such assertion, and to receive from the other Party a justification of its position on such matters.

5.2.1. If on the basis of the Parties' review of any terms of the Agreement, either Party concludes that the other Party has not complied in good faith with the terms of the Agreement, then such Party may issue a written "Notice of Non-Compliance" specifying the grounds therefor and all facts demonstrating such non-compliance.

5.2.2. The Party receiving a Notice of Non-Compliance shall have thirty (30) calendar days to cure or remedy the non-compliance identified in the Notice of Non-Compliance, or if such cure or remedy is not reasonably capable of being cured or remedied within such thirty (30) days period, to commence to cure or remedy the non-compliance and to diligently and in good faith prosecute such cure or remedy to completion.

5.2.3. If the Party receiving the Notice of Non-Compliance does not believe it is out of compliance and contests the Notice, it shall do so by responding in writing to said Notice within thirty (30) calendar days after receipt of the Notice.

5.2.4. If a Notice of Non-Compliance is contested, the Parties shall, for a period of not less than fifteen (15) calendar days following receipt of the response, seek to arrive at a mutually acceptable resolution of the matter(s) occasioning the Notice. In the event that a cure or remedy is not timely effected or, if the Notice is contested and the Parties are not able to arrive at a mutually acceptable resolution of the matter(s) by the end of the fifteen (15) calendar day period, the party alleging the non-compliance may thereupon pursue the remedies provided in Article 6 of this Agreement.

5.2.5. Neither Party hereto shall be deemed in breach if the reason for non-compliance is due to a "force majeure" as defined in, and subject to the provisions of, Section 11.9 below or any other non performance authorized by this Agreement.

5.3 Certificate of Agreement Compliance. If, at the conclusion of an annual review, HF is found to be in compliance with this Agreement, City shall, upon request by HF, issue a Certificate of Agreement Compliance (“Certificate”) to HF stating that after the most recent Periodic Review and based upon the information known or made known to the City that (1) this Agreement remains in effect and that (2) HF is in compliance. The Certificate, shall be in recordable form, shall contain information necessary to communicate constructive record notice of the finding of compliance, and shall state that the Certificate expires upon the earlier of (i) one (1) year from the date thereof, or (ii) the date of recordation of a Notice of Termination of Development Agreement. HF may record the Certificate with the County Recorder. Additionally, HF may at any time request from the City a Certificate stating, in addition to the foregoing, which obligations under this Agreement have been fully satisfied with respect to the Subject Property, or any lot or parcel within the Subject Property.

ARTICLE 6 DEFAULT AND REMEDIES.

6.1 Specific Performance; Waiver of Damages. The Parties acknowledge and agree that specific performance is the preferred remedy available for the enforcement of this Agreement. Accordingly, both parties hereby waive the right to obtain monetary damages from the other Party by reason of default of this Agreement. Subject to the procedure set forth in Section 5.2 above, any material default by HF or the City of the Agreement that is not timely cured by HF or the City shall be deemed a material default by HF or the City of this Agreement.

6.2 Termination of the Agreement.

6.2.1. Termination of Agreement for Default of HF. The City in its reasonable discretion may terminate this Agreement for any failure of HF to perform any material duty or obligation of HF hereunder or to comply in good faith with the terms of this Agreement (hereinafter referred to as “default” or “breach”); provided, however, the City may terminate this Agreement pursuant to this Section only after following the procedure set forth in Section 5.2 and HF and/or Assignee fail to remedy any issue. Further, if a mortgage of HF comes into possession of the Subject Property by default of HF, City may without liability, and in its sole and absolute discretion, terminate this Agreement. A bankruptcy filing by HF or general Partner of HF, or HF’s successors and assigns, shall also be grounds by City for termination of this Agreement.

6.2.2. Termination of Agreement for Default of City. HF in its reasonable discretion may terminate this Agreement for any default by the City; provided, however, HF may terminate this Agreement pursuant to this Section only after following the procedure set forth in Section 5.2 and thereafter providing written notice by HF to the City of the default setting forth the nature of the default and the actions, if any, required by the City to cure such default and, where the default can be cured, the failure of the City to cure such default within thirty (30) days after the effective date of such notice or, in the event that such default cannot be cured within such thirty (30) day period, the failure of the City to commence to cure such default within such thirty (30) day period and to diligently proceed to complete such actions and to cure such default.

6.2.3. Rights and Duties Following Termination. Upon the termination of this Agreement, no Party shall have any further right or obligation hereunder and City shall treat HF

and the Subject Property pursuant to all ordinances, policies, and laws as uniformly applied in the City.

6.3 Institution of Legal Action. Subject to notice of default and opportunity to cure under Section 5.2, in addition to any other rights or remedies, any Party to this Agreement may institute an equitable action to cure, correct, or remedy any default, to enforce any covenants or agreements herein, to enjoin any threatened or attempted violation hereof, or to obtain any other equitable remedies consistent with this Agreement. Any action at law or in equity arising under this Agreement or brought by any Party hereto for the purpose of enforcing, construing or determining the validity of any provision of this Agreement shall be filed and tried in the Superior Court of the County of Riverside, State of California, or such other appropriate court in said County, and the Parties hereto waive all provisions of law providing for the filing, removal or change of venue to any other court. Service of process on the City shall be made in accordance with California law. Service of process on HF shall be made in any manner permitted by California law and shall be effective whether served inside or outside California. If an action or proceeding is brought by any Party to this Agreement because of default, or to enforce a provision hereof, the prevailing Party shall be entitled to reimbursement of all costs and expenses, including attorneys' fees, incurred in prosecuting such legal action or proceeding. This provision is separate and severable, and shall survive the merger of this Agreement into any judgment on this Agreement. In all instances, the Parties agree that §6.1 also survives and controls the actions of the Parties, and further, that the Parties shall stipulate to the limitation on remedies imposed by §6.1.

ARTICLE 7 THIRD PARTY LITIGATION.

7.1 Notice, Defense and Indemnification of Third Party Litigation. The City shall promptly notify HF of any claim, action, or proceeding filed and served against the City to challenge, set aside, alter, void, annul, limit or restrict the approval and continued implementation and enforcement of this Agreement or any Existing Regulation, including but not limited to Project Approvals and CEQA challenges, as they may be filed from time to time by one or more third parties. HF agrees to fully defend, indemnify and hold the City harmless for all costs of defense and/or judgment(s) obtained in any such action or proceeding by reimbursing City, on a monthly basis, for any and all costs. The City shall notify HF within ten (10) calendar days after the City has selected the defense counsel(s). The City and HF agree to cooperate in the defense of such action(s), which includes HF being provided the opportunity to present City its views and recommendations regarding defense counsel or defense strategy. City shall use its best efforts to reasonably manage case costs and seek reasonable attorney rates.

7.2 Effect of Third Party Litigation on Implementation of Agreement. If any third party litigation referred to in Section 7.1 is filed, the City shall continue to comply with the terms of this Agreement unless prohibited from doing so by court order.

7.3 If third party litigation is filed and if HF decides, in its sole and absolute discretion, not to defend the litigation then upon providing written notice of that decision to the City not to defend the litigation this Agreement shall terminate and no Party shall thereafter have any rights or obligations under it. Nothing in this Agreement shall prevent the City, if it decides in its sole and absolute discretion, from defending the litigation at its own sole cost.

ARTICLE 8 MORTGAGEE AND LENDER PROTECTION.

8.1 The Parties hereto agree that this Agreement shall not prevent or limit HF, in any manner, at HF's sole discretion, from encumbering the Subject Property or any portion thereof or any improvement thereon by any mortgage, deed of trust or other security device securing financing with respect to the Subject Property. The City acknowledges that the lenders providing such financing may require certain Agreement interpretations and modifications and agrees upon request, from time to time, to meet with HF and representatives of such lenders to negotiate in good faith any such request for interpretation or modification but City reserves the right to make the final decisions, pursuant to law of such requests. The City is not bound nor is there any predetermination as to matters requiring public hearing or any adjudicative proceeding. Subject to compliance with applicable laws, the City will not unreasonably withhold its consent to any such requested interpretation or modification provided the City determines such interpretation or modification is consistent with the intent and purposes of this Agreement and not harmful to City in any manner, in City's sole and absolute discretion. HF shall reimburse City for all costs incurred by City in connection with compliance with this Section 8.1 HF represents and warrants that there are presently no financing of any type or nature that encumber the Subject Property and further represents there are no covenants, financings or other burdens that impair City's rights under this Agreement, and further, no third party holds rights to the Subject Property superior to this Agreement as regards to City's rights.

8.2 Any Mortgagee of the Subject Property shall be entitled to the following rights and privileges:

(a) Neither entering into this Agreement nor a breach of this Agreement shall defeat, render invalid, diminish or impair the lien of any mortgage on the Subject Property made in good faith and for value, unless otherwise required by law.

(b) The Mortgagee of any mortgage or deed of trust encumbering the Subject Property, or any part thereof, which Mortgagee has submitted a request in writing to the City in the manner specified herein for giving notices, shall be entitled to receive written notification from the City of any default by HF in the performance of HF's obligations under this Agreement.

(c) If the City timely receives a request from a Mortgagee requesting a copy of any notice of default given to HF under the terms of this Agreement, the City shall make a good faith effort to provide a copy of that notice to the Mortgagee within ten (10) days of sending the notice of default to HF. The Mortgagee shall have the right, but not the obligation, to cure the default during the period that is the longer of (i) the remaining cure period allowed such Party under this Agreement, or (ii) thirty (30) days.

(d) Any Mortgagee who comes into possession of the Subject Property, or any part thereof, pursuant to foreclosure of the mortgage or deed of trust, or deed in lieu of such foreclosure, shall take the Subject Property, or part thereof, subject to the terms of this Agreement. Notwithstanding any other provision of this Agreement to the contrary, no Mortgagee shall have an obligation or duty under this Agreement to perform any of HF's obligations or other affirmative covenants of HF hereunder, or to guarantee such performance;

except that (i) to the extent that any covenant to be performed by HF is a condition precedent to the performance of a covenant by the City, the performance thereof shall continue to be a condition precedent to the City's performance hereunder, and (ii) in the event any Mortgagee seeks to develop or use any portion of the Subject Property acquired by such Mortgagee by foreclosure, deed of trust, or deed in lieu of foreclosure, such Mortgagee shall strictly comply with all of the terms, conditions and requirements of this Agreement and the Development Plan applicable to the Subject Property or such part thereof so acquired by the Mortgagee. The successor Mortgagee is hereby on notice that the event of taking possession of the Subject Property allows, but does not require City to terminate this Agreement without cost or liability to City.

8.3 The City shall, at HF's cost paid to City immediately upon City's request, provide publically available information requested by potential lenders in a timely fashion. City shall not be required, but may, provide any information exempt from disclosure under the California Public Records Act. (G.C. 6250 et. seq.)

ARTICLE 9 INSURANCE.

9.1 Liability Insurance. HF shall maintain an insurance policy protecting against death or injury to person or property for claims arising out of activities on the Subject Property in the amount of at least five million dollars (\$5,000,000) with the City, its officers, officials, employees, agents and representatives named as additional insured. This requirement is in addition to any liability insurance requirement which the City routinely imposes as a condition to the issuance of a building or grading permit. In addition, all such insurance:

- (a) shall be primary insurance and not contributory with any other insurance the City or its officers, officials, employees, agents, and representatives may have;
- (b) shall contain no special limitations on the scope of protection affordable to the City and its officers, officials, employees, agents, and representatives;
- (c) shall be claims made and not dates of occurrence insurance;
- (d) shall apply separately to each insured against whom claim is made or suit is brought, except with respect to the limits of the insurer's liability;
- (e) shall provide that the policy shall not be canceled by the insurer or Owner unless there is a minimum of thirty (30) days prior written notice to the City;
- (f) shall be endorsed to include a waiver of subrogation rights against the City or its officers, officials, employees, agents, and representatives; and
- (g) shall not require Owner to meet a deductible of more than One Hundred Thousand Dollars (\$100,000) unless approved in writing by the City's Community Development Director in his/her sole and absolute discretion.

9.2 Workers Compensation Insurance. HF shall ensure that any consultant or contractor hired by HF for work on or related to the Subject Property shall carry workers

compensation insurance as required by the State of California. This requirement is in addition to any workers compensation insurance requirement which the City routinely imposes as a condition to the issuance of a building or grading permit.

ARTICLE 10 INDEMNITY FOR INJURY TO PERSON OR PROPERTY.

HF agrees to and shall indemnify, defend, and hold harmless the City and the City's officers, officials, members, employees, agents, and representatives, from and against any and all claims, liabilities, awards, settlements, agreements, damages, and losses, including without limitation reasonable attorneys' fees and litigation expenses, including court and expert witness fees (collectively, "Claims"), with respect to any action brought due to the death or personal injury of any person, or physical damage to any person's real or personal property, caused by the construction of improvements by, or construction-related activities of, HF or HF's employees, agents, representatives, servants, invitees, consultants, contractors, or subcontractors (collectively, "HF's Representatives") on the Subject Property, or for any construction defects in any improvements constructed by HF or HF's Representatives on the Subject Property or for any other work related to this Agreement.. The foregoing indemnification provision shall survive the termination of this Agreement.

Notwithstanding the above, HF agrees to and shall indemnify, defend, and hold harmless the City and the City's officers, officials, members, employees, agents and representatives, from and against any and all claims, liabilities, damages, and losses, including without limitation reasonable attorneys' fees and litigation expenses, including court and expert witness with respect to any action brought to challenge the Project's entitlement approvals and/or the EIR.

ARTICLE 11 MISCELLANEOUS PROVISIONS.

11.1 Recordation of Agreement. The City Clerk shall have this Agreement recorded with the County Recorder within the period required by Government Code section 65868.5. Any amendments to this Agreement approved by the Parties, and any cancellation hereof, shall be similarly recorded. A failure to record this Agreement in a timely fashion shall not affect its validity in any manner.

11.2 Entire Agreement. This Agreement sets forth and contains the entire understanding and agreement of the Parties with respect to the subject matter set forth herein, and there are no oral or written representations, understandings or ancillary covenants, undertakings or agreements which are not contained or expressly referred to herein. No testimony or evidence of any such representations, understandings or covenants shall be admissible in any proceeding of any kind or nature to interpret or determine the terms or conditions of this Agreement except as to future and further agreements and the exercise of the Existing Regulations.

11.3 Severability. If any term, provision, covenant or condition of this Agreement shall be determined invalid, void or unenforceable, the invalid provision shall be deemed to be severable from the remaining provisions contained within the Agreement. The Parties hereby state and acknowledge they would have adopted each provision contained within this Agreement notwithstanding the presence of an invalid provision.

11.4 Interpretation and Governing Law. This Agreement and any dispute arising hereunder shall be governed and interpreted in accordance with the laws of the State of California. This Agreement shall be construed as a whole according to its fair language and common meaning to achieve the objectives and purposes of the Parties, and the rule of construction to the effect that ambiguities are to be resolved against both the drafting parties or in favor of the City or HF shall not be employed in interpreting this Agreement, all Parties having been represented by counsel in the negotiation and preparation, adoption, application and execution hereof.

11.5 Section Headings. All section headings and subheadings are inserted for convenience only and shall not affect any construction or interpretation of this Agreement.

11.6 Singular and Plural. As used herein, the singular of any word includes the plural.

11.7 Waiver. Failure of a Party to insist upon the strict performance of any of the provisions of this Agreement by the other Party, or the failure by a Party to exercise its rights upon the default of the other Party, shall not constitute a waiver of such Party's right to insist and demand strict compliance by the other Party with the terms of this Agreement thereafter.

11.8 No Third Party Beneficiaries. This Agreement is made and entered into for the sole protection and benefit for the Parties and their successors and assigns. No other person shall have any right of action based upon any provision of this Agreement.

11.9 Force Majeure. Neither Party shall be deemed to be in default where failure or delay in performance of any of its obligations under this Agreement is caused by earthquakes, acts of God, fires, wars, riots or similar hostilities, strikes and other labor difficulties beyond the Party's control (including the Party's employment force), economic or environmental/physical conditions (such as lack of utilities) beyond HF's control which make Development uneconomic or infeasible, other causes beyond the Party's reasonable control or court actions (such as restraining orders or injunctions). If any such events shall occur, the Term of this Agreement and the time for performance shall be extended for the duration of each such event, provided that the Term shall not be extended under any circumstances for more than three (3) years regardless of the number or length of individual extensions and further, in no instance, shall be for a duration longer than the circumstance serving to cause the delay. Notwithstanding the foregoing, if construction ceases after commencement, but prior to the issuance of Certificates of Occupancy, HF, at its sole cost, shall secure, preserve and prevent any nuisance conditions from occurring on the Subject Property.

11.10 Mutual Covenants. The covenants contained herein are mutual covenants and also constitute conditions to the concurrent or subsequent performance by the Party benefited thereby of the covenants to be performed hereunder by such benefited Party.

11.11 Counterparts. This Agreement may be executed by the Parties in counterparts, which counterparts shall be construed together and have the same effect as if all of the Parties had executed the same instrument.

11.12 Covenant Not To Sue Each Other Regarding the Construction of the Agreement. The Parties to this Agreement, and each of them, agree that this Agreement and each term hereof

are legal, valid, binding, and enforceable. The Parties to this Agreement, and each of them, hereby covenant and agree that each of them will not commence, maintain, or prosecute any claim, demand, cause of action, suit, or other proceeding against any other Party to this Agreement, in law or in equity, or based on an allegation, or assert in any such action, that this Agreement or any term hereof is void, invalid, or unenforceable.

11.13 Project as a Private Undertaking. It is specifically understood and agreed by and between the Parties that the Development of the Subject Project is a private development, that neither Party is acting as the agent of the other in any respect hereunder, and that each Party is an independent contracting entity with respect to the terms, covenants and conditions contained in this Agreement. No partnership, joint venture or other association of any kind is formed by this Agreement. The only relationship between the City and HF is that of a government entity regulating the Development of private property, on the one hand, and the holder of legal or equitable title to such property, on the other hand.

11.14 Further Actions and Instruments. Each of the Parties shall cooperate in good faith with and provide reasonable assistance to the other to the extent contemplated hereunder in the performance of all obligations under this Agreement and the satisfaction of the conditions of this Agreement. Upon the request of either Party at any time, the other Party shall promptly execute, with acknowledgment or affidavit if reasonably required, and file or record such required instruments and writings and take any actions as may be reasonably necessary under the terms of this Agreement to carry out the intent and to fulfill the provisions of this Agreement or to evidence or consummate the transactions contemplated by this Agreement.

11.15 Amendments in Writing/Cooperation. This Agreement may be amended only by written consent of both Parties specifically approving the amendment and in accordance with the Government Code section 65868. The Parties shall cooperate in good faith with respect to any amendment proposed in order to clarify the intent and application of this Agreement, and shall treat any such proposal on its own merits, and not as a basis for the introduction of unrelated matters. Subject to the provisions of Moreno Valley Municipal Code Section 9.02.110E, minor, non-material modifications which are clerical or strictly technical corrections which do not affect the substantive terms and conditions of the Agreement may be approved by the Community Development Director in consultation with the City Attorney as an operating Memorandum. City, upon its request, may be compensated for its costs reasonably incurred in reviewing and processing any request under this section, including costs arising from third parties engaged by the City in furtherance of any request.

11.16 Operating Memoranda. The Parties acknowledge and agree that the provisions of this Agreement require a close degree of cooperation between the City and HF, and Development of the Subject Property hereunder may demonstrate that refinements or clarifications are appropriate with respect to the details of performance of the City and HF. If and when, from time to time, during the Term of this Agreement, the City and HF agree that such refinements or clarifications are necessary or appropriate, they will effectuate such refinements or clarifications through operating memoranda approved by the City and HF, which, after execution, will be attached to this Agreement as addenda and become a part hereof, and may be further refined or clarified from time to time as necessary with future approval by the City and HF. The Community Development Director, in consultation with the City Attorney,

will be authorized to make the determination whether a requested refinement or clarification and corresponding operating memoranda may require a public hearing and approval by the City Council. Notwithstanding the foregoing, the City staff or contract staff may decline to execute any operating Memoranda and may instead submit the matter to the City Council for its consideration and action.

11.17 Corporate Authority. The person(s) executing this Agreement on behalf of each of the Parties hereto represent and warrant that (i) such Party are duly organized and existing, (ii) they are duly authorized to execute and deliver this Agreement on behalf of said Party, (iii) without representing and warranting whether or not the Agreement is lawful by so executing this Agreement, such Party is formally bound to the provisions of this Agreement, and (iv) the entering into this Agreement does not violate any provision of any other agreement to which such Party is bound.

11.18 Notices. All notices under this Agreement shall be effective upon any of the following: personal delivery, via e-mail, via facsimile so long as the sender receives confirmation of successful transmission from the sending machine, or three (3) business days after deposit in the United States mail, registered, certified, postage fully prepaid and addressed to the respective Parties as set forth below or as to such other address as the Parties may from time to time designate in writing:

To City: City of Moreno Valley
14177 Frederick Street
Moreno Valley, California 92552
Attn: City Manager
Telephone: (____) _____
Facsimile: (____) _____
E-mail address: _____

Copies to: City Attorney

_____, California
Telephone: (____) _____
Facsimile: (____) _____
E-mail address: _____

To HF: Iddo Benzeevi
President and Chief Executive Officer
Highland Fairview Operating Co.
14225 Corporate Way
Moreno Valley, CA 92553
Telephone: (951) 867-5327
Facsimile: (____) _____
E-mail Address: ibenzeevi@highlandfairview.com

Copy to: Kenneth B. Bley, Esq.
Cox, Castle & Nicholson LLP

2029 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 284-2231
Facsimile: (310) 284-2100
E-mail address: kbley@coxcastle.com

11.19 Nonliability of City Officials. No officer, official, member, employee, contractor, attorney, agent, or representatives of the City shall be liable for any amounts due hereunder, and no judgment or execution thereon entered in any action hereon shall be personally enforced against any such officer, official, member, employee, agent, or representative.

11.20 No Brokers. The City and HF represent and warrant to the other that neither has employed any broker and/or finder to represent its interest in this transaction. Each Party agrees to indemnify and hold the other free and harmless from and against any and all liability, loss, cost, or expense (including court costs and reasonable attorney’s fees) in any manner connected with a claim asserted by any individual or entity for any commission or finder’s fee in connection with this Agreement arising out of agreements by the indemnifying Party to pay any commission or finder’s fee.

IN WITNESS WHEREOF, the Parties hereto have executed this Agreement on the day and year first set forth above.

City:

CITY OF MORENO VALLEY

By

Mayor, City of Moreno Valley

ATTEST:

By

City Clerk

APPROVED AS TO FORM:

By

City Attorney

Attachment: Exhibit A to Proposed Ordinance_ Development Agreement (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

HF:
HF PROPERTIES,
a California general partnership

By:
Name: Iddo Benzeevi
Its: President

SUNNYMEAD PROPERTIES,
a Delaware general partnership

By:
Name: Iddo Benzeevi
Its: President

THEODORE PROPERTIES PARTNERS,
a Delaware general partnership

By:
Name: Iddo Benzeevi
Its: President

13451 THEODORE, LLC,
a California limited liability company

By:
Name: Iddo Benzeevi
Its: Sole member

Attachment: Exhibit A to Proposed Ordinance_ Development Agreement (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

HL PROPERTY PARTNERS,
a Delaware general partnership

By:

Name: Iddo Benzeevi

Its: President

**ALL TERMS OF THIS AGREEMENT ARE SUBJECT TO REACHING A MUTUALLY
AGREEABLE RESOLUTION ON ALL ITEMS BETWEEN THE CITY AND HF**

Attachment: Exhibit A to Proposed Ordinance_ Development Agreement (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

State of California)
County of _____)

On _____, before me, _____
(insert name and title of the officer)

Notary Public, personally appeared _____,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are
subscribed to the within instrument and acknowledged to me that he/she/they executed the same
in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument
the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the
foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature

(Seal)

Attachment: Exhibit A to Proposed Ordinance_ Development Agreement (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

State of California)
County of _____)

On _____, before me, _____
(insert name and title of the officer)

Notary Public, personally appeared _____,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are
subscribed to the within instrument and acknowledged to me that he/she/they executed the same
in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument
the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the
foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature

(Seal)

State of California)
County of _____)

On _____, before me, _____
(insert name and title of the officer)

Notary Public, personally appeared _____,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are
subscribed to the within instrument and acknowledged to me that he/she/they executed the same
in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument
the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the
foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature

(Seal)

EXHIBIT A-1
LEGAL DESCRIPTION OF THE SUBJECT PROPERTY

Attachment: Exhibit A to Proposed Ordinance_ Development Agreement (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

EXHIBIT A-2
DEPICTION OF THE SUBJECT PROPERTY

Attachment: Exhibit A to Proposed Ordinance_ Development Agreement (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

EXHIBIT NO. A-3

Public Benefits; all are viewed as material consideration for this Agreement, by the City and its Council (not listed in priority).

1. Representation and Warranty in support of HF's legal or equitable interest in the land composing the area subject to this Agreement. (Recital E and 3.2)
2. DIF fees, public improvements, or both will be paid to the City to further public improvements. (1.5, 4.8, 4.9)
3. City has oversight over transfer of land or buildings within the area covered by the Agreement. (3.4)
4. HF pays for special staff and consultants. (3.6)
5. Education/Library/Job training/funding to City/Job opportunities. (4.11, 4.12)
6. Fire station: "turn key" fire station will be built on HF provided land and will be fully funded and equipped by HF. (4.8)
7. Land owners are bound, contractually, to provide City benefits beyond those available via a nexus condition.
8. City advances its General Plan's goals, policies and objectives as anticipated when it was adopted.
9. City controls when HF has qualified to release itself, in whole or part, from the Development Agreement. (3.4, 3.5)
10. City preserves its right to impose the enhanced development standards on the Project outlined in the specific plan. (4.2)
11. City has set performance criteria for the Terms of the Agreement. (3.5, 4.4)
12. City preserves the right to update standards and, as required and lawful, require further CEQA reviews. (4.7.1)
13. City Code Standards are imposed for any reimbursements to HF for oversizing any infrastructure. (4.8)
14. City required and is able to hold HF accountable for a local hiring program for City residents. (4.11)
15. City obtains Education, Library, Training, and Innovation funding for residents in the amount up to \$6,993,000, during the Term of the Development Agreement, with One

- Million Dollars (\$1,000,000) of that being provided in a single lump sum payment upon issuance of the first building permit.
16. HF will contribute \$500,000 toward the City's development of SR 60 landscape, signage, bridge design enhancement. (4.13)
 17. Specified homes are to be offered air filtration systems at no charge. (4.14)
 18. City will annually review and enforce its benefits, and ensure performance of its duties. (Article 5)
 19. Defaults and issues in dispute have a specified resolution process. (Article 6)
 20. City is covered by HF funded liability insurance (9.1) and from tort claims. (Article 10)
 21. City is protected as to ensuring HF performance, despite external causation. (11.9)

RESOLUTION NO. 2015-59

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MORENO VALLEY, CALIFORNIA REQUESTING THE RIVERSIDE LOCAL AGENCY FORMATION COMMISSION TO INITIATE PROCEEDINGS FOR THE EXPANSION OF THE CITY BOUNDARY FOR AN APPROXIMATE 85 ACRES OF LAND LOCATED ALONG GILMAN SPRINGS ROAD AND ALESSANDRO BOULEVARD (APN NOS. 422-130-002 AND 422-130-003)

WHEREAS, the City Council of the City of Moreno Valley desires to initiate proceedings pursuant to the Cortese-Knox Local Government Reorganization Act, commencing with Section 56000 of the California Government Code, for an amendment expanding the City limits of the City; and

WHEREAS, the two parcels that constitute the annexation area are currently included in the City's Sphere of Influence; and

WHEREAS, the territory proposed to be included within the proposed City limits is uninhabited, and the boundaries of said territory are identified in Exhibit A (attached); and

WHEREAS, the City Council finds that the proposed expansion of the City boundary is necessary to carry out its responsibility for future planning and the logical and orderly development of the City; and,

WHEREAS, future needs for public facilities and services need to be planned in those areas logical to the City's future expansion; and

WHEREAS, the City Council finds that the proposed annexation is tied to the certified Environmental Impact Report for the proposed World Logistics Center Project; and

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF MORENO VALLEY, CALIFORNIA, DOES HEREBY RESOLVE AS FOLLOWS:

1. That an application for amendment of the City limits shall be submitted for consideration by the Riverside County Local Agency Formation Commission ("LAFCO") for the area shown in the attached map. (Exhibit "A")

- 2. The City Clerk is authorized and directed to file a certified copy of this Resolution with the Executive Officer of LAFCO together with such other information and documents as may be required by the Executive Officer.

APPROVED AND ADOPTED this _____ day of July, 2015.

Mayor

ATTEST:

City Clerk

APPROVED AS TO FORM:

City Attorney

2
Resolution No. 2015 -59
Date adopted: July 15, 2015

Attachment: Proposed Resolution_Annexation [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

RESOLUTION JURAT

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF MORENO VALLEY)

I, Jane Halstead, City Clerk of the City of Moreno Valley, California, do hereby certify that Resolution No. 2015-59 was duly and regularly adopted by the City Council of the City of Moreno Valley at a regular meeting thereof held on the 15th day of July, 2015 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

(Council Members, Mayor Pro Tem and Mayor)

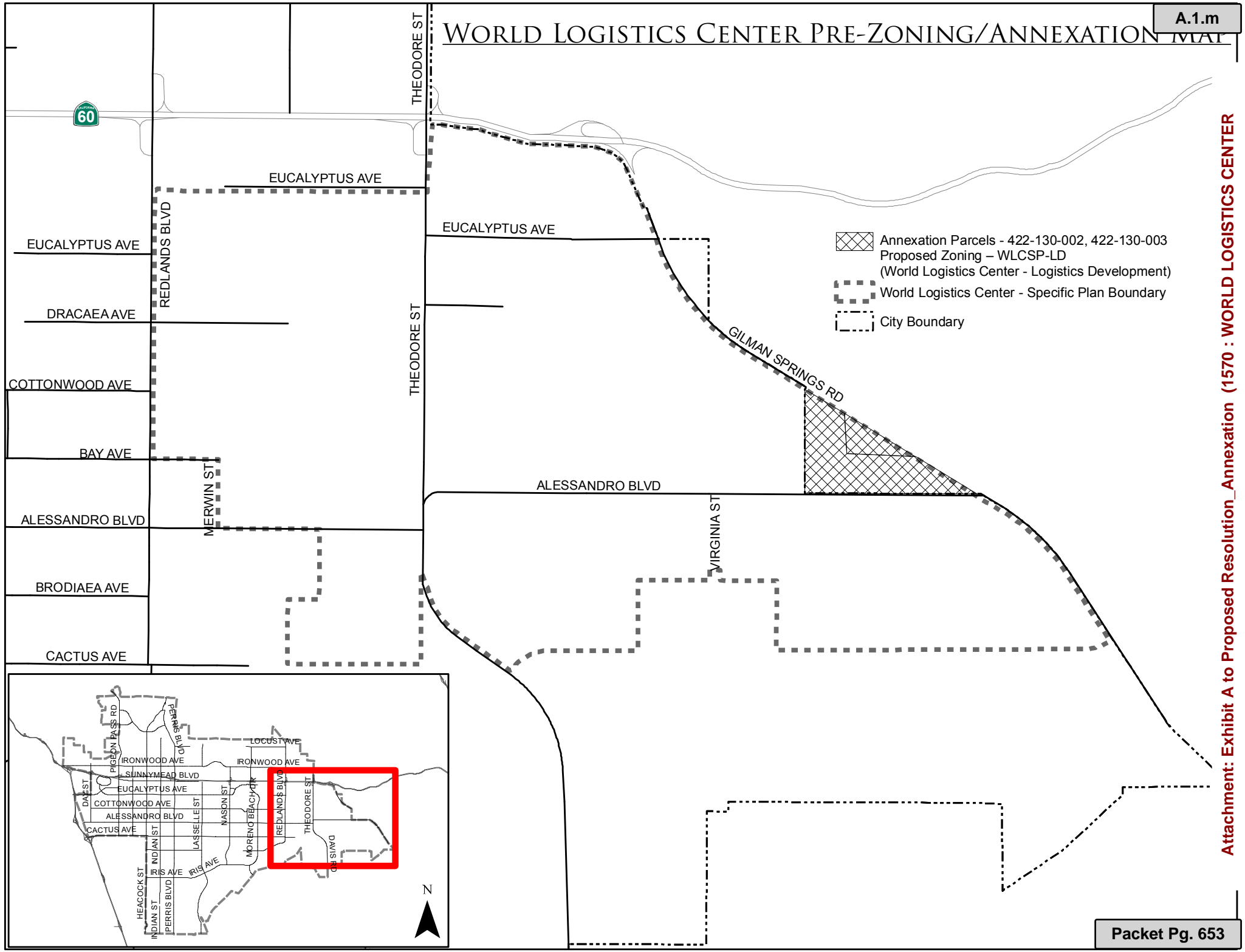
CITY CLERK





(SEAL)

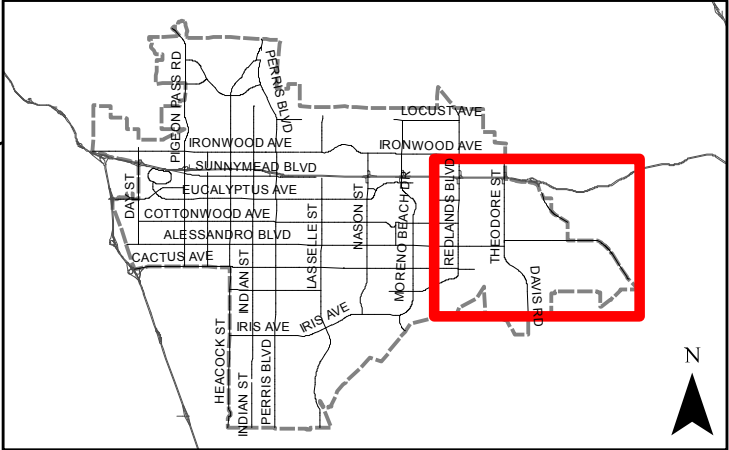
3
Resolution No. 2015 -59
Date adopted: July 15, 2015

Attachment: Proposed Resolution_Annexation [Revision 1] (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

WORLD LOGISTICS CENTER PRE-ZONING/ANNEXATION



-  Annexation Parcels - 422-130-002, 422-130-003
-  Proposed Zoning - WLCSP-LD
(World Logistics Center - Logistics Development)
-  World Logistics Center - Specific Plan Boundary
-  City Boundary



Attachment: Exhibit A to Proposed Resolution_Annexation (1570 : WORLD LOGISTICS CENTER

RESOLUTION NO. CSD 2015-29

A RESOLUTION OF THE MORENO VALLEY COMMUNITY SERVICES DISTRICT BOARD OF DIRECTORS OF THE CITY OF MORENO VALLEY, CALIFORNIA TO REQUEST THE RIVERSIDE LOCAL AGENCY FORMATION COMMISSION TO INITIATE PROCEEDINGS FOR THE EXPANSION OF THE COMMUNITY SERVICES DISTRICT BOUNDARY TO INCLUDE AN APPROXIMATE 85 ACRES OF LAND LOCATED ALONG GILMAN SPRINGS ROAD AND ALESSANDRO BOULEVARD IN CONJUNCTION WITH A RELATED ANNEXATION (APN NOS. 422-130-002 AND 422-130-003)

WHEREAS, the Moreno Valley Community Services District (CSD) desires to initiate proceedings pursuant to the Cortese-Knox Local Government Reorganization Act, commencing with Section 56000 of the California Government Code, for an amendment of the Community Services District boundary; and

WHEREAS, the territory proposed to be included within the proposed expansion of the Community Services District boundary is uninhabited and included in the City's Sphere of Influence, and the boundaries of said territory are identified in Exhibit A (attached); and

WHEREAS, the CSD Board of Directors finds that the proposed expansion of the Community Services District boundary is consistent with the City's sphere of influence and desired annexation; and

WHEREAS, future needs for public facilities and services need to be planned in those areas logical to the City's and District's future expansion and Service areas; and

WHEREAS, the CSD Board of Directors finds that the proposed expansion of the Community Services District boundary is tied to the certified Environmental Impact Report and project description for the World Logistics Center Project; and

NOW, THEREFORE, THE MORENO VALLEY COMMUNITY SERVICES DISTRICT BOARD OF DIRECTORS OF THE CITY OF MORENO VALLEY, CALIFORNIA, DOES HEREBY RESOLVE AS FOLLOWS:

1. That an application for expansion of the Community Services District shall be submitted for consideration by the Riverside County Local Agency Formation Commission ("LAFCO") for the area shown in the attached map (Exhibit "A").

- 2. The City Clerk is authorized and directed to file a certified copy of this Resolution with the Executive Officer of LAFCO together with such other information and documents as may be required by the Executive Officer.

APPROVED and ADOPTED this _____ day of _____, 2015.

Mayor of the City of Moreno Valley

ATTEST:

City Clerk

APPROVED AS TO FORM:

City Attorney

RESOLUTION JURAT

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF MORENO VALLEY)

I, Jane Halstead, City Clerk of the City of Moreno Valley, California, do hereby certify that Resolution No. 2015-29 was duly and regularly adopted by the City Council of the City of Moreno Valley at a regular meeting thereof held on the 15th day of July, 2015 by the following vote:

AYES:

NOES:

ABSENT:

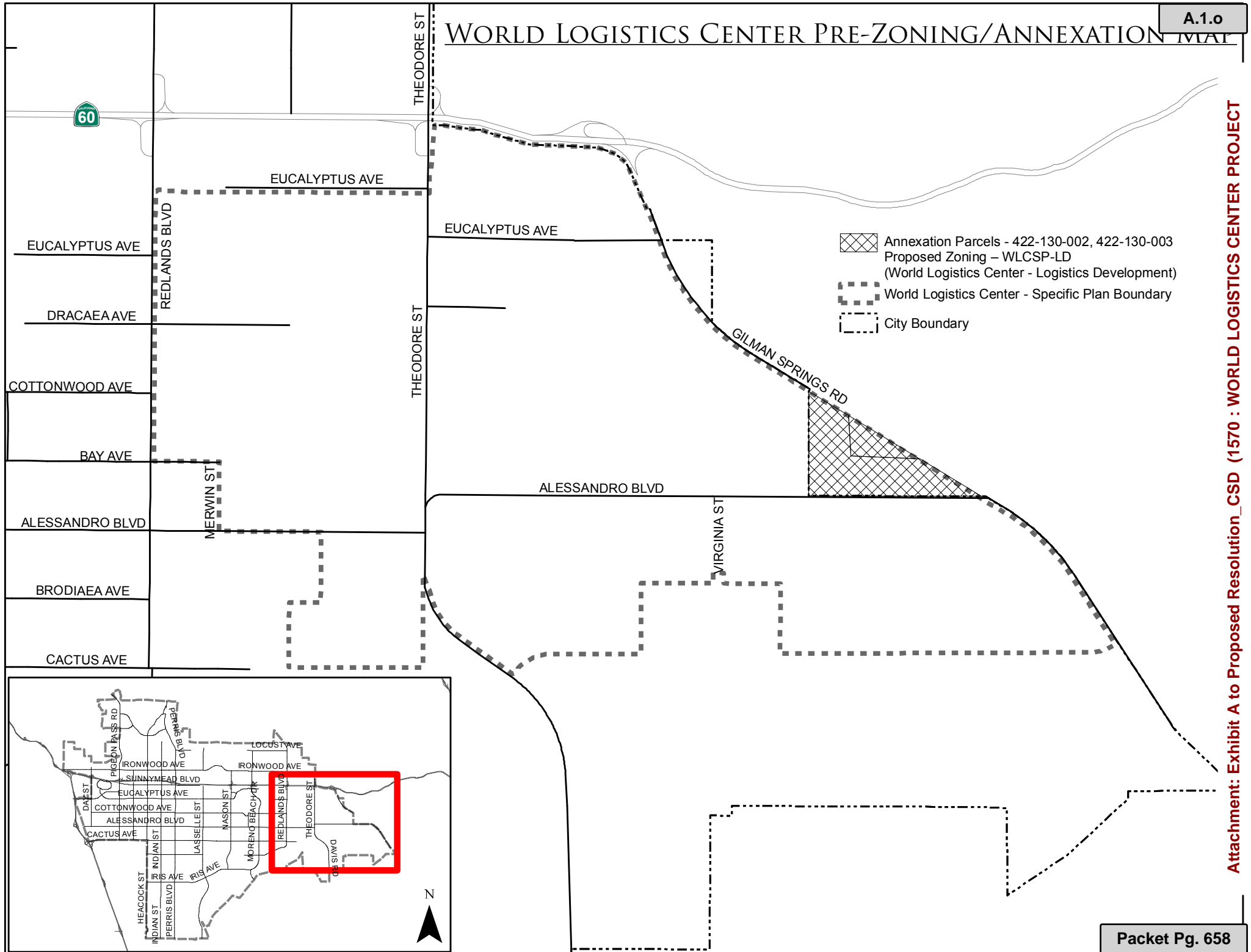
ABSTAIN:

(Council Members, Mayor Pro Tem and Mayor)

CITY CLERK

(SEAL)

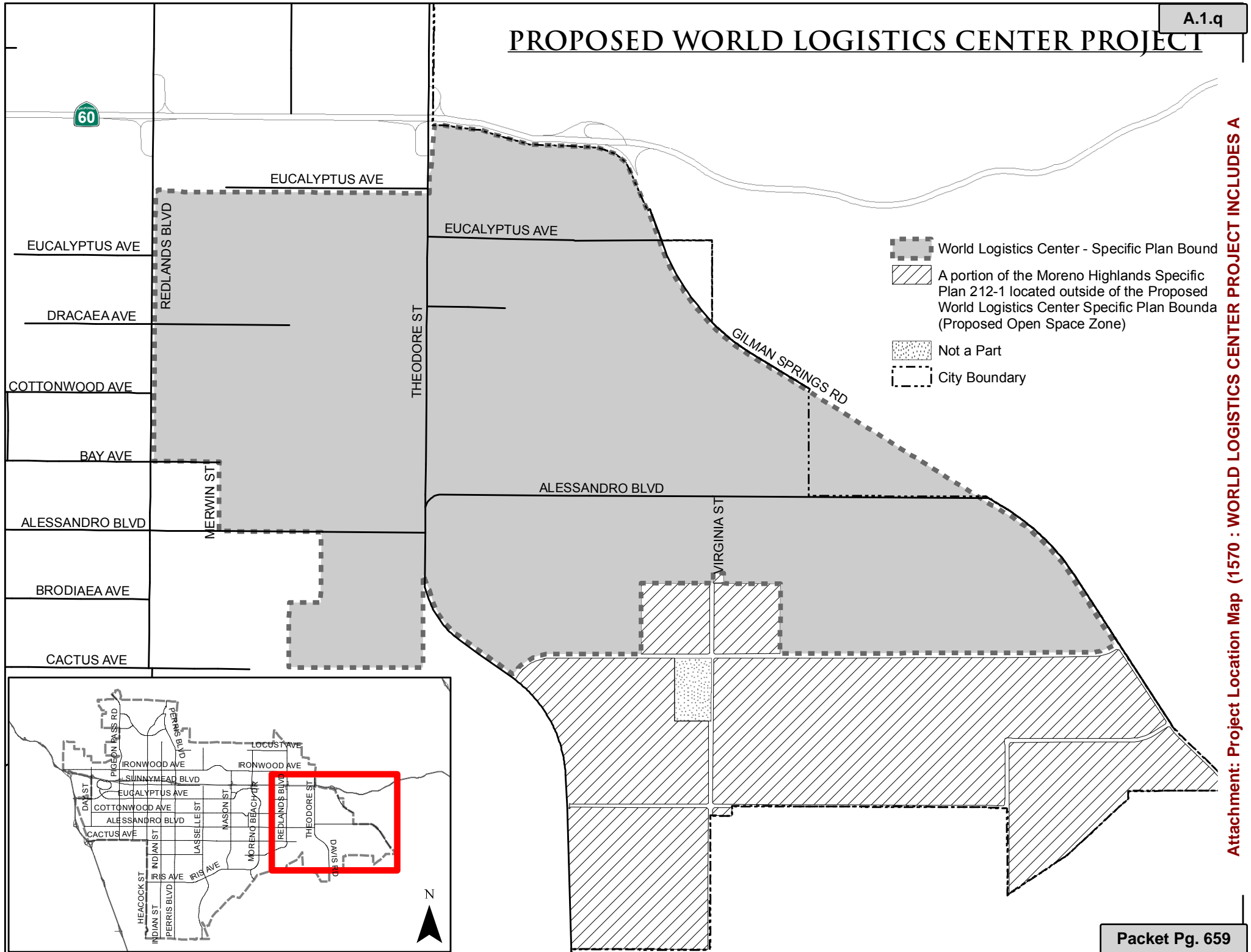
WORLD LOGISTICS CENTER PRE-ZONING/ANNEXATION



-  Annexation Parcels - 422-130-002, 422-130-003
-  Proposed Zoning – WLCSP-LD
(World Logistics Center - Logistics Development)
-  World Logistics Center - Specific Plan Boundary
-  City Boundary

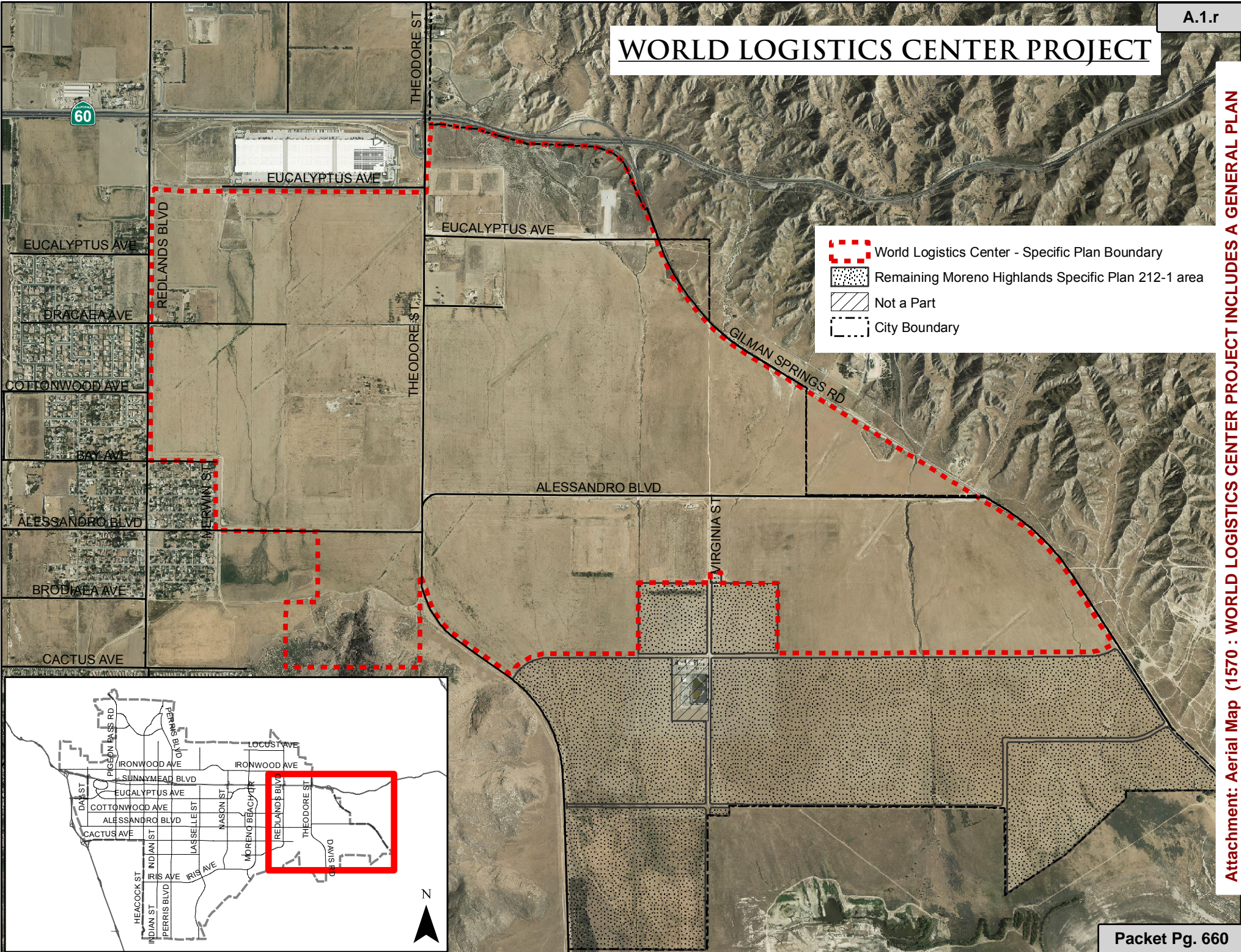
Attachment: Exhibit A to Proposed Resolution_CSD (1570 : WORLD LOGISTICS CENTER PROJECT





PROPOSED WORLD LOGISTICS CENTER PROJECT



Attachment: Project Location Map (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A

WORLD LOGISTICS CENTER PROJECT



-  World Logistics Center - Specific Plan Boundary
-  Remaining Moreno Highlands Specific Plan 212-1 area
-  Not a Part
-  City Boundary

Attachment: Aerial Map (1570) : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

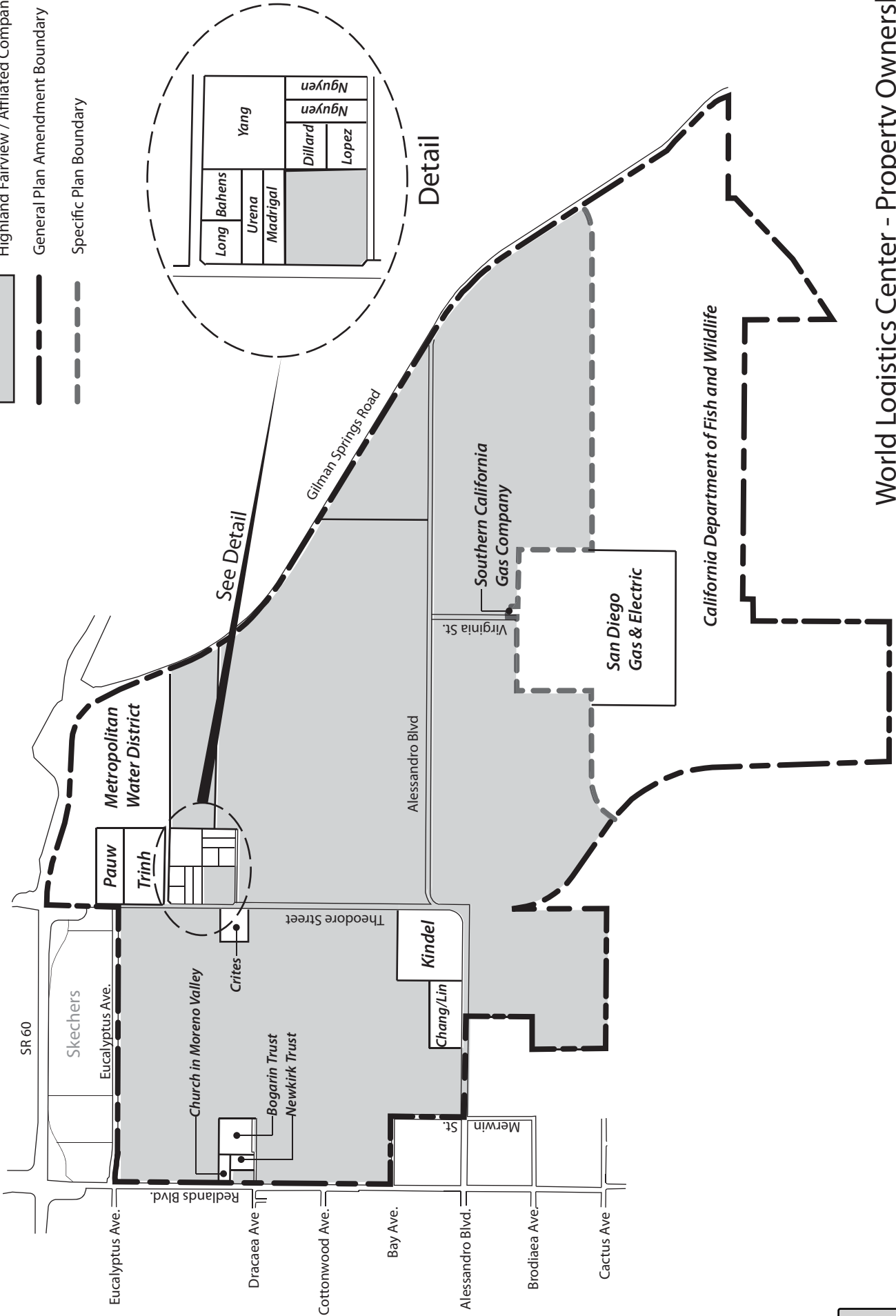


Planning Area (PA)	Land Use	Area	Building SF
Logistics Development			
1	LD	77.8	1,100,000
2	LD	193.5	4,200,000
3	LD	120.3	1,600,000
4	LD	301.5	5,600,000
5	LD	64.2	1,100,000
6	LD	115.3	500,000
7	LD	10.3	50,000
8	LD	142.9	2,150,000
9	LD	485.8	10,400,000
10	LD	139.9	2,200,000
11	LD	500	8,000,000
12	LD	231.3	3,500,000
		2,382.8	40,400,000
Light Logistics			
20	LL	16.1	45,500
21	LL	10.5	77,250
22	LL	10.5	77,250
		37.1	200,000
Open Space			
30	OS	74.3	
		74.3	
Right of Way			
ROW		115.8	
		115.8	
Grand Total		2,610.0	40,600,000



Exhibit 2-1 Land Use Plan

- Legend:**
- Highland Fairview / Affiliated Companies
 - General Plan Amendment Boundary
 - Specific Plan Boundary



World Logistics Center - Property Ownership

Scale: None

Attachment: Highland Fairview Property Ownership Map (1570) : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN

February 8, 2012

Mr. Iddo Benzeevi
 Chief Executive Officer
 Highland Fairview Operating Company
 14225 Corporate Way
 Moreno Valley, CA 92553

RE: Highland Fairview Specific Plan / World Logistics Center

Dear Mr. Benzeevi:

Our City staff is pleased to assist Highland Fairview to finalize a development application involving your proposed World Logistics Center development. As staff indicated, the application will need to include a General Plan Amendment, a Specific Plan, a zone change, and other land use approvals concerning Highland Fairview's properties in the eastern part of the city.

As you are also aware, over the past year, the City has developed and is now implementing an aggressive economic development strategy which identified logistics as a prime area of focus and opportunity for development in the eastern portion of the city, generally regarded as the Rancho Belago area. The area identified by the City for logistics warehouse distribution uses is located east of Redlands Blvd., south of SR-60 and stretching to the City's eastern boundary at Gilman Springs Road and continuing to the City's southern border. This area of the City is generally referred to as the "Moreno Highlands area".

The City Council has already taken two formal actions to advance the City's economic development plan. These past actions include the adoption of the City's amended Housing Element in February 2011, which states the City's intent to consider comprehensive General Plan and zoning amendments for the Moreno Highlands area to facilitate the development of logistics uses.

In addition, in April 2011, the City adopted a comprehensive Economic Development Action Plan for the City which identified the Moreno Highlands area as an "Area of Opportunity for logistics development". Collectively, these City actions reflect our intent to authorize the initiation of a planning process pursuant to City Zoning Code sections 9.02.040 and 9.02.050 whereby amendments to the City's General Plan, the existing Moreno Highlands Specific Plan, and other zoning changes would be considered for the entirety of the Moreno Highlands area which are consistent with the City's economic development strategy.

Mr. Iddo Benzeevi
Highland Fairview Specific Plan / World Logistics Center
Page 2

Given the City's directive and economic development program for the entire area, the extensive infrastructure requirements, to insure consistent and compatible land use and for the area to be comprehensively and consistently re-entitled, it would be impossible for the City to undertake a planning process that does not consider the entire Moreno Highlands area, including land currently not owned or controlled by Highland Fairview. Standard planning practice would not lend itself to considering a proposed new land plan that included only a portion of Moreno Highlands area or land only owned by one party.

For these reasons, City management is requesting and staff has directed the Highland Fairview entitlement team and City planning staff to analyze the entire Moreno Highlands area, and not just land currently controlled by Highland Fairview.

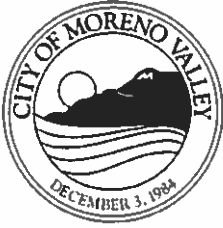
Please contact me if you have any questions or concerns regarding the foregoing.

Sincerely,

A handwritten signature in brown ink, consisting of several overlapping loops and curves, positioned above the printed name.

Henry Garcia
City Manager

HG:lr



APPROVALS	
BUDGET OFFICER	<i>caf</i>
CITY ATTORNEY	<i>Res</i>
CITY MANAGER	<i>ms</i>

Report to City Council

TO: Mayor and City Council

FROM: Barry Foster, Community & Economic Development Director

AGENDA DATE: May 22, 2012

TITLE: PUBLIC HEARING REGARDING THE EXPANSION OF THE APPLICATIONS FOR A GENERAL PLAN AMENDMENT (PA12-0010), CHANGE OF ZONE (PA12-0012) AND SPECIFIC PLAN (PA12-013) FOR THE WORLD LOGISTICS CENTER PROJECT AND A RECOMMENDATION FROM THE CITY COUNCIL TO INCLUDE PROPERTIES NOT OWNED BY OR PARTICIPATING WITH THE PROJECT APPLICANT, HIGHLAND FAIRVIEW PROPERTIES.

RECOMMENDED ACTION

Staff recommends that the City Council conduct the Public Hearing and thereafter direct staff to apply one of the alternatives set forth below pertaining to properties not owned by or participating with Highland Fairview Properties in their applications for a general plan amendment, change of zone and specific plan for the World Logistics Center Project.

BACKGROUND

In April 2011, the City Council adopted a comprehensive Economic Development Action Plan (EDAP) that identified the Moreno Highlands area, generally located east of Redlands Boulevard and south of the Moreno Valley Freeway (Highway 60), as an "area of opportunity for logistics development". The Plan also identified logistics as a prime area of focus and opportunity for the City in an effort to increase employment and revenue to benefit residents and local businesses and support the provision of public services.

On March 19, 2012, Highland Fairview Properties (HFP) submitted General Plan Amendment, Change of Zone and Specific Plan applications to the Planning Division for the proposed World Logistics Center (WLC) Project. The WLC Project is the type of

project envisioned by the adopted City Council EDAP and could further the implementation of the EDAP.

The WLC Project applications include land owned or participating with HFP in the WLC Project and a number of properties not owned by or participating with HFP in the WLC Project or the applications. HFP has also submitted Tentative Parcel Map, Annexation and Development Agreement applications for the same project. All land in the last three applications is owned by or participating with HFP. The General Plan Amendment, Change of Zone, Specific Plan and Tentative Parcel Map were deemed to be complete for processing on April 18, 2012.

The proposed World Logistics Center Specific Plan is a master plan for the development of up to 41.6 million square feet of modern high-cube logistics warehouse distribution facilities on approximately 2,665 acres of land located generally east of Redlands Boulevard, south of the Moreno Valley Freeway (Highway 60) and west of Gilman Springs Road. The General Plan Amendment and Change of Zone, which cover approximately 3,820 acres, also include 1,136 acres of open space and 19 acres of existing public utility facilities located south of the Specific Plan area and north of the City limits. The majority of the Project area is currently covered by the Moreno Highlands Specific Plan, a 3,038 acre master plan approved in 1992 with a mixture of residential, commercial, business park and public/recreation uses.

DISCUSSION

The Municipal Code authorizes an amendment to the General Plan to be initiated by any one of three actions: (1) recommendation of the Planning Commission and City Council concurrence; (2) recommendation of the City Council; or (3) a privately filed application for a specific property or properties submitted by the property owner or owner's authorized agent (MC Section 9.02.040). The Municipal Code similarly authorizes an amendment for a change of zone to be initiated by one of three actions: (1) recommendation of staff or the Planning Commission; (2) recommendation of the City Council; or (3) a privately filed application from a property owner or the owner's authorized agent relating to the owner's property (MC Sections 9.02.050). The Municipal Code does not have explicit provisions to include properties not providing authorization for a Specific Plan or similar type of project (MC Section 9.02.190). For such projects, the practice has been to include only properties providing authorization. Therefore, staff is requesting City Council direction as set forth below.

The majority of Specific Plan area is owned by HFP affiliated companies. Authorization has also been provided by the second largest owner in the Specific Plan area, the Henrietta Lee Trust. In addition, a group of owners in the southwest portion of the Specific Plan area and one owner on Theodore Street have provided authorization for the Project.

The approximate 1,155 acres located outside of the Specific Plan area but within the General Plan Amendment and Change of Zone applications are owned by the California

Department of Fish and Game, San Diego Gas& Electric and the Southern California Gas Company. None of these entities have provided authorization for the Project. Attachment 1 provides a map of the ownership and location of the properties identified above in this paragraph.

Approval of the WLC Project would require the elimination of the Moreno Highlands Specific Plan (MoHi) that covers most of the Project area, including all of the area outside of the proposed WLC Specific Plan. The MoHi plan has been covered by a 20-year development agreement negotiated by the original master developer, that until this year precluded action by the City or any single landowner to revise the area's land use or zoning. To eliminate the MoHi plan, the utility and open space outside the proposed WLC Specific Plan need to be included in the General Plan Amendment and Change of Zone applications to provide alternative land use designations compatible with the current use of the property for utility facilities and open space.

Within the Specific Plan area, there are 18 owners (total of 21 parcels) that have not provided authorization for the Project. The largest landowner of these parcels is the Metropolitan Water District of Southern California (MWD) which owns 132 acres, but only uses 18 acres of the property for its Inland Feeder water transmission system. The remaining 114 acres has been determined as surplus by MWD. These parcels total approximately 294 acres or 11% of the Specific Plan area. The majority of the other parcels (13 total parcels) are located northeast of Theodore Street and Dracaea Avenue; three parcels are northeast of Redlands Boulevard and Dracaea Avenue; three parcels are northwest of Theodore Street and Alessandro Boulevard; and two are northeast of Cactus Avenue and Merwin Street. All of these properties are located outside of the MoHi plan area. Some of the parcels are developed with single family homes and accessory structures. Others have agricultural activities or are vacant. Only seven existing residential units are located within the boundaries of the proposed WLC Specific Plan, with four being owner-occupied and three rental properties.

The non-participating parcels identified in the above paragraph are either located adjacent to the primary truck access route for the proposed WLC Specific Plan (Theodore Street) or are surrounded on three or more sides by participating properties. All but three of the properties are currently zoned for residential uses, which would be incompatible in close proximity or surrounded by the proposed development of logistics uses. Therefore, it would further advance a consistent and comprehensive planning strategy to include these parcels in the General Plan Amendment and Change of Zone applications in order to identify new more appropriate land use designations for consideration in conjunction with the overall WLC Project. Inclusion in the Specific Plan application will allow for greater design consistency in property development and simplify the development review process should properties in and out of the Specific Plan be combined. Any existing structures or uses would become non-conforming with approval of any land use changes and would be allowed to remain in place unless abandoned for an extended period of time (currently one year per the City Municipal Code).

The initial draft of the Specific Plan includes two land use categories – Logistics and Light Logistics. The former category is generally limited to large logistics facilities. The latter category is intended to include properties that are too small to accommodate large logistics facilities. Staff has worked with the applicant to expand the list of permitted uses in the Light Logistics category to include thirteen possible uses for warehouse, storage and similar activities (see attached Exhibit 3). Most of these uses are consistent with the permitted uses in the Moreno Valley Industrial Area Specific Plan in the south part of the City.

ALTERNATIVES

Staff is seeking direction from the City Council as to which of the following options should be followed in processing the WLC Project applications:

1. Include all properties not providing authorization in all three applications. This action is a recommendation by the City Council to include all properties not providing authorization to be included in all three applications. This action would provide for the development of consistent land uses and development regulations for the area east of Redlands Boulevard. If adopted, such land uses and regulations would change and make most existing property improvements non-conforming.
2. Include all properties not providing authorization in the General Plan and Change of Zone applications, but not the Specific Plan application. This action would be a recommendation by the City Council to include all properties not providing authorization to be included in the applications for a General Plan Amendment and Change of Zone. This action would provide for the development of consistent land uses for the area east of Redlands Boulevard, but would allow for non-participating parcels to default to existing City zoning classifications that provide a greater variety of uses which may be incompatible with the logistics focus proposed for the area. If adopted, such land uses and regulations would change and make most existing property improvements non-conforming.
3. Include some of the properties in one or more of the applications. This action is a recommendation by the City council to include certain of the properties not providing authorization to be included in one or more of the applications. This action would not provide for the development of consistent land uses for the area east of Redlands Boulevard. If the Specific Plan is adopted, such inconsistent land uses would affect the current property rights and expectations of non-participating property owners by increasing the level of review and regulation to provide consistency, but would not make existing property improvements non-conforming. This action would also increase the level of review and regulation to provide consistency for development within the Specific Plan.

FISCAL IMPACT

All direct costs associated with the processing of the WLC Project applications shall be borne by HFP.

NOTIFICATION

Notice of this Public Hearing was sent to all property owners within the WLC Project area and tracts and properties adjacent to the Project area. Notice of the Hearing was also published in the Press Enterprise on April 27, 2012, and posted in proximity to properties located within the Project area that did not provide authorization for the WLC Project applications.

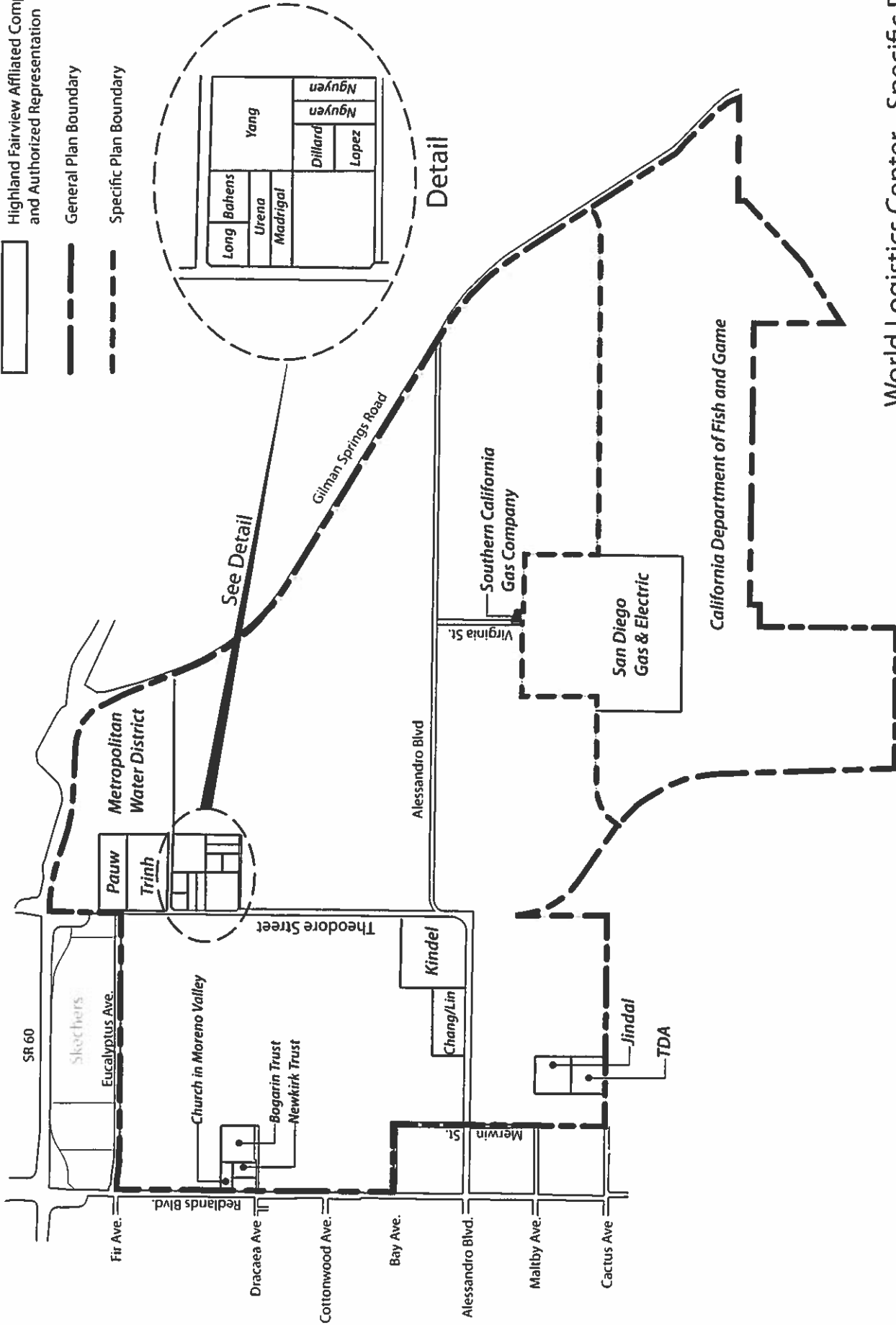
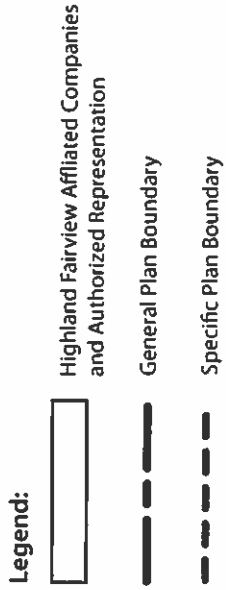
ATTACHMENTS/EXHIBITS

- 1. Map of Non-Participating Parcels with Owner Names
- 2. Map of Draft Land Use Plan for Proposed Specific Plan
- 3. LL "Light Logistics" Permitted Uses

Prepared By:
John C. Terrell AICP
Planning Official

Department Head Approval:
Barry Foster
Community & Economic Development Director

Council Action	
Approved as requested:	Referred to:
Approved as amended:	For:
Denied:	Continued until:
Other:	Hearing set for:



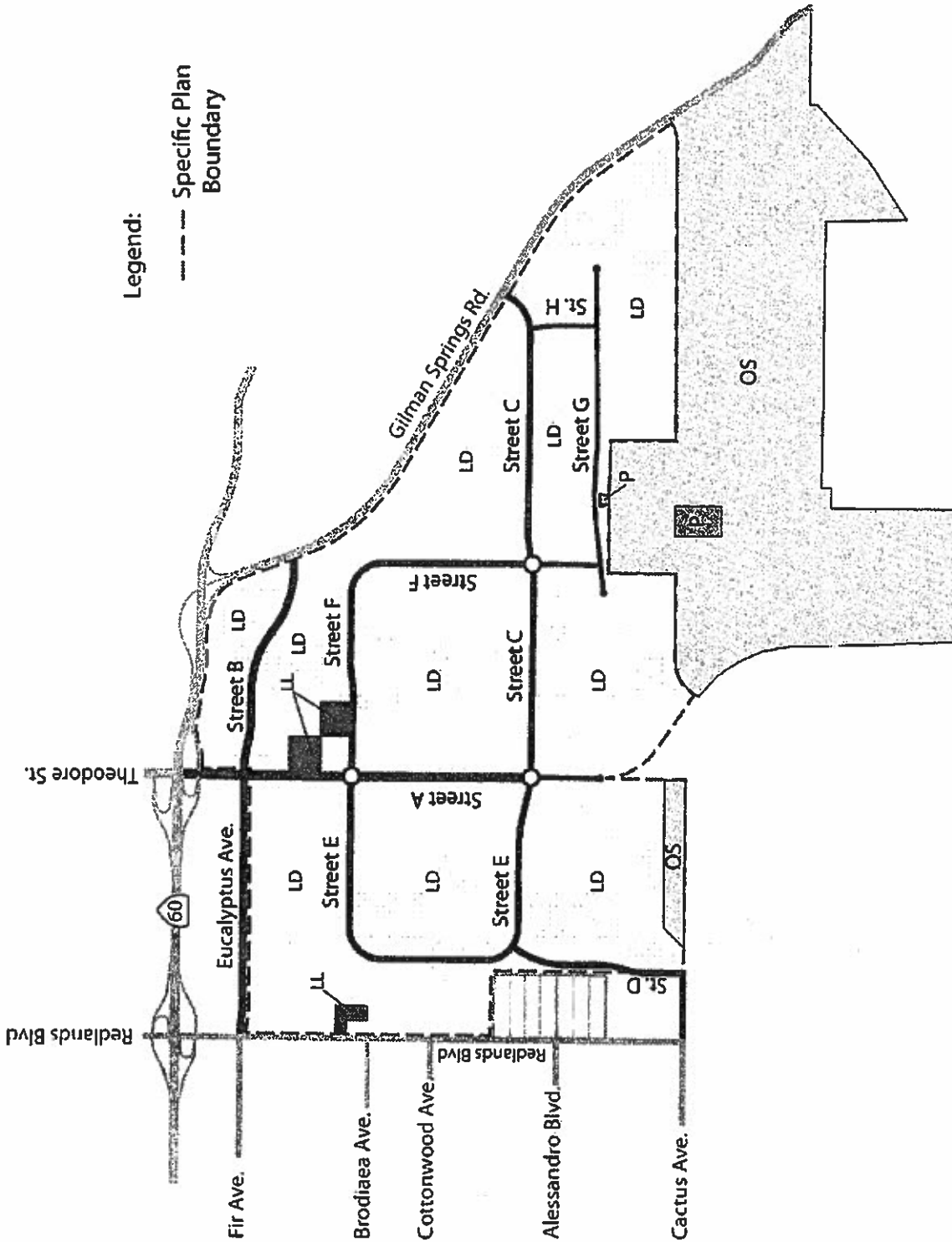
World Logistics Center - Specific Plan

ATTACHMENT 1



Scale: None
April 10, 2012





Legend:
 --- Specific Plan Boundary

Specific Plan Boundary

ATTACHMENT 2



DRAFT

SP | STANDARDS & GUIDELINES

APPENDICES

LL "Light Logistics" Permitted Uses

Currently in LL Category:

1. Agricultural Uses
2. Warehouses
3. Self-storage
4. Vehicle and container storage
5. Construction yards within, or immediately adjacent to approved construction sites
6. Cellular transmission facilities and structures
7. Public facilities

DRAFT

To be Added:

8. Public Storage/Mini Warehousing w/Outdoor Storage (replace "self-storage")
9. Wholesale/storage/distribution
10. Nursery supplies
11. Building Contractor's Storage
12. Building Material and Equipment Supplies w/Outdoor Storage
13. Caretaker's Residence

Definitions:

Public Storage/Mini-Warehouses: Activities include mini-warehouse or recreational vehicle storage facilities for the rental or lease of small scale enclosed storage units or parking spaces to individuals, firms or organizations.

Light Wholesale, Storage and Distribution: Activities typically include: wholesale, storage, and warehousing services and storage and wholesale to retailers from the premises of finished goods.

Medium Wholesale, Storage and Distribution: Activities typically include: wholesale, storage and warehousing services, moving and storage services, storage and wholesaling to retailers from the premises of finished goods, and distribution facilities.

Heavy Wholesale, Storage and Distribution: Activities typically include: warehousing, storage, freight handling, shipping, trucking services and terminals; storage and wholesaling from the premises of unfinished, raw or semi-refined products. Typically uses include, but are not limited to, trucking firms, automotive storage or impound yards.

Agricultural/Nursery Supplies and Services: Activities typically include: tree services and plant materials and nursery/landscape services.

A large, bold, black stamp with the word "DRAFT" in all caps, slanted upwards to the right. To the left of the text is a small icon of a document with a checkmark.

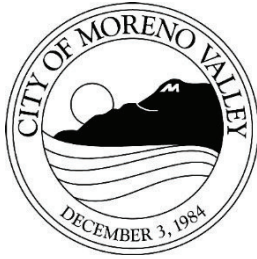
Building Contractor's Storage Yards: Activities typically include: offices and storage of equipment materials, and vehicles for contractors who are in trades involving construction activities.

Building & Site Maintenance Services: Activities include maintenance and custodial services, including, but not limited to: window cleaning services, pool and landscape services, etc.

Caretaker's Residence: Where 24-hours on-site surveillance is necessary in conjunction with an industrial use, a caretaker's residence is permitted. A caretaker's residence shall not be used to establish a single-family residence in conjunction with a business.

Vehicle Storage: Includes the storage of vehicles used regularly in business operations and not available for sale on-site including but not limited to: overnight storage of trucks, trailers and containers, service vehicles, catering trucks, etc. inclusive of dispatching services. Uses include the storage of operable and inoperative vehicles, including impound yards.

Outdoor Storage: Any material, equipment or vehicle that is not stored within an enclosed structure. Outdoor storage is permitted, subject to the screening requirements of this Specific Plan.



PLANNING COMMISSION

STAFF REPORT

Meeting Date: June 11, 2015

WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A CHANGE OF ZONE, WORLD LOGISTICS CENTER SPECIFIC PLAN, A PRE-ZONING/ANNEXATION, TENTATIVE PARCEL MAP NO. 36457, AND A DEVELOPMENT AGREEMENT FOR A 3,818 ACRE PROJECT AREA IN THE EASTERN PORTION OF THE CITY.

Case: PA12-0010 (General Plan Amendment)
 PA12-0011 (Development Agreement)
 PA12-0012 (Change of Zone)
 PA12-0013 (Specific Plan)
 PA12-0014 (Annexation)
 PA12-0015 (Tentative Parcel Map No. 36457)
 P12-016 (Environmental Impact Report)

Applicant: Highland Fairview Inc.

Owner: Highland Fairview and various private property owners

Representative: Iddo Benzeevi

Location: The project area is in the eastern portion of the city and is more specifically located east of Redlands Boulevard, south of the SR-60 Freeway, west of Gilman Springs Road, and north of the San Jacinto Wildlife Area.

Proposal: The proposed World Logistics Center (WLC) project involves approximately 3,818 acres of property and includes multiple applications. A General Plan Amendment changing the land use potential for the project area to Business Park/Light Industrial (BP) and Open Space (OS), includes associated

modifications to the Community Development Element, Parks, Recreation and Open Space Element, Circulation Element, Safety Element, and Conservation Element. A Specific Plan for 2,610 acres of the project area is proposed to establish vision and development regulations for up to 40.6 million square feet of logistic development, and light logistics land uses, predominantly in the form of large high-cube industrial warehouse and distribution centers, and approximately 20,000 square feet of logistics support (e.g. fueling, associated retail). The proposed Change of Zone would result in changes to the zoning atlas to reflect the designated areas for Logistics Development (LD), Light Logistics (LL) and Open Space (OS) for the entire project area both within and outside the proposed Specific Plan boundary. Eighty-five (85) acres of land at the northwest corner of Alessandro Boulevard and Gilman Springs Road within the Specific Plan boundary would be pre-zoned for LD and is intended for a subsequent Annexation to the City. Tentative Parcel Map No. 36457 is proposed to divide property for finance and conveyance purposes only. A Development Agreement is proposed between the City and Highland Fairview for only that real estate within the Specific Plan boundary in which Highland Fairview has a legal or equitable interest (approximately 2,263 acres). Approval of the various project applications will result in a repeal of the current Moreno Highlands Specific Plan No. 212-1

Recommendation: Certification of the Final Program Environmental Impact Report for the project, and approval of the proposed General Plan Amendment, Specific Plan, Change of Zone, Pre-zoning for subsequent Annexation, Tentative Parcel Map No. 36457, and Development Agreement by the City Council are all recommended.

Case Planner: Mark Gross

Council District: 3

SUMMARY

The proposed project would establish clear City vision and development regulations for a significant portion of the eastern area of the City. The project area is primarily vacant

today with seven existing developed residential properties (Attachment 9). The development regulations in place today for much of the project area are codified as the Moreno Highlands Specific Plan (MHSP), which was adopted April 17, 1992. Over the past twenty-three years, notwithstanding the MHSP being in place, the area has experienced nearly non-existent growth or development.

The World Logistics Center is a large, complex project that encompasses a project area of approximately 3,818 acres in the eastern portion of the City. The project area is generally bound by State Route 60 on the north, Gilman Springs Road on the east, the San Jacinto Wildlife Area on the south and Redlands Boulevard on the west (Attachment 8). The project proposes to convert the land use and zoning potential for the area from a variety of residential, commercial, industrial business park, mixed-use and open space land uses to a predominantly industrial and open space based land use mix. Specifically, the industrial focused Specific Plan would allow for subsequent development of up to 40,600,000 square feet of warehousing and distribution centers to complement anticipated market growth in logistics and goods movement demand. In addition to the proposed industrial land use, the project would result in a significant consolidation of Open Space zoning in the southwestern portion of the Specific Plan area and in the southern portion of the overall project area adjacent to the San Jacinto Wildlife Area. This consolidation would be consistent with the intended land use purpose envisioned in the current General Plan. It is also considerate of the California Department of Fish and Wildlife's significant purchase of land in that portion of the project area back in 2002 as well as land purchases by the Sempra energy company that intended the land to be uses as open area.

The project applications submitted by Highland Fairview include a number of entitlements, including: 1) General Plan Amendment, 2) Specific Plan and corresponding zoning atlas changes for approximately 2,610 acres of the total project area, 3) Pre-zoning of an 85-acre parcel within the proposed Specific Plan area that is identified for future annexation to the City of Moreno Valley, 4) A Tentative Parcel Map for financing and conveyance purposes only, 5) A Development Agreement for approximately 2,263 acres of the approximate 2,610 acre proposed Specific Plan, and 6) Zoning atlas changes for approximately 1,104 acres within the overall project area but outside of the proposed Specific Plan area for Open Space, 104 acres is estimated for off-site improvement areas.

If approved, the proposed Specific Plan will serve as the regulatory framework and implementation tool for future development within the Specific Plan area. The Specific Plan document includes development standards, list of allowable land uses, building and landscape guidelines, on and off-site design standards, infrastructure requirements, maintenance regulations, and other pertinent regulations to ensure a sustainable high quality enclave of the City. The City Municipal Code, Title 9, will serve as the regulatory framework for the portions of the overall project area not included in the Specific Plan boundary.

PROJECT DESCRIPTION

Project

The proposed WLC project area encompasses approximately 3,818 acres in the eastern part of the City. The 2,610 acre Specific Plan area is included within the overall project area. The Specific Plan establishes development framework for up to 40,600,000 square feet of industrial, logistics, high cube, warehouse and distribution center land uses and related “logistics support” uses. A 74.3 acre parcel located in the southwest corner of the Specific Plan area is proposed as Open Space. Project areas outside and south of the Specific Plan boundaries make up approximately 1,104 acres and are designated as Open Space zoning. Another 104 acres within the project area will accommodate offsite improvements. The project area is generally bound by State Route 60 on the north, Gilman Springs Road on the east, the San Jacinto Wildlife Area on the south and Redlands Boulevard on the west.

Exhibit 2-1 of the Specific Plan shows the proposed Land Use Plan. As described on Exhibit 2-1, up to 40,400,000 square feet of high-cube warehouse (i.e. larger than 500,000 square foot buildings) logistics uses and “logistic support” uses (e.g. fueling, convenience retail) are proposed in the planning areas designated for “Logistics Development” (LD) zoning. Up to 200,000 square feet of smaller warehouse (i.e. less than 500,000 square foot buildings) are proposed in areas designated for “Light Logistics” (LL) zoning (Attachment 15). Allowance is provided in the Specific Plan for associated office and accessory uses to be conducted within the warehouse logistics uses. As described in the Specific Plan, logistics uses include facilities intended for storage, assembly and processing of manufactured goods and materials prior to their distribution to other facilities.

It is important to note that the project area and the development intensity described in the Draft Environmental Impact Report, which was circulated for public review in early 2013, have since both been reduced. The project area was reduced by approximately 100 acres and the development intensity of the project was reduced by one million square feet.

The applicant has provided documents confirming it holds legal or equitable interest in approximately 2,263 acres within the 2,610 acre Specific Plan area, which was reviewed by special legal counsel. The remainder of the project area is owned by sixteen private entities, the Metropolitan Water District, San Diego Gas & Electric Company, Southern California Gas Company, and California Department of Fish and Game (Attachment 16).

The applicant’s proposal is consistent with the Economic Development Action Plan adopted by the City Council in 2011, and updated in 2013. These Council-approved Plan documents recognize opportunities to support the emerging logistics industry in the eastern portion of the City and the economic development potential of logistics development in the area of the proposed World Logistics Center. As cited by Highland Fairview, a February 2012 letter from the City Manager indicates that “the City has developed and is now implementing an aggressive economic development strategy which identified logistics as a prime area of focus and opportunity for development in the eastern portion of the city” and references “the City’s intent to consider

comprehensive General Plan and zoning amendments for the Moreno Highlands area to facilitate the development of logistics uses” (Attachment 13). This direction was subsequently supported by City Council action at a public meeting held on May 22, 2012 (Attachment 14).

The following describes the discretionary entitlement applications requested with the project and staff analysis and findings with each:

1. General Plan Amendment (PA12-0010)

Description

The applicant is requesting amendments to the Community Development Element, Parks, Recreation and Open Space Element, Conservation Element, Safety Element, and Circulation Element of the City General Plan that collectively will set forth policy goals, and exhibits that allow for Open Space (OS) and Business Park/Light Industrial (BP/LI) land uses to occur in the project area, and which can facilitate development of the applicant’s desired industrial logistics warehouse and distribution centers (Attachment 3).

Text and map modification to General Plan Elements include amendment of the Community Development Element related to modification of land uses, Parks, Recreation and Open Space Element for modification of existing multi-use trail configurations, open space and future parkland acquisition areas, Conservation Element to modify the Major Scenic Resources Map, Safety Element to modify noise contours and Fire Station Map, Circulation Element to change General Plan Street designations and roadway configurations, and General Plan Goals and Objectives to include a revised Circulation Plan, level of service (LOS) standards and Bikeway Plan Map. Detailed information on General Plan changes is included as Attachment 10 of this staff report.

Analysis

The proposed General Plan Land Use Amendment would modify land use designations from the current general plan land use designations of business park, single-family residential, multiple family residential, commercial/retail, public facilities, and open space to Business Park/Light Industrial (BP/LI) and Open Space (OS). The proposed General Plan land use amendments would be consistent with the zoning established in the WLC Specific Plan which would allow industrial related land uses and related office, ancillary and logistics support uses. Land use change to Open Space (OS) is proposed for areas outside and to the south of the WLC Specific Plan which include California Department of Fish and Wildlife, San Diego Gas and Electric and the Southern California Gas Company properties.

The General Plan land use amendment to Business Park/Light Industrial would constitute a significant policy change for the eastern portion of Moreno Valley. The variety of land uses currently shown in the General Plan for this area of the city allow for

business park/industrial, single and multiple-family residential, commercial/retail, mixed use, public and open space land uses. The land use change to Business Park/Light Industrial coupled with the proposed Specific Plan regulations would result in two principal land uses: industrial warehouse distribution centers and open space. The proposed land use changes that will reduce residential zoning potential are consistent with assumptions in the earlier 2011 Housing Element update, as well as the current Housing Element adopted on February 12, 2014. The reduction in housing units is consistent with a shift toward industrial zoning strategies and goals outlined in the City's 2011 and 2013 Economic Development Action Plans. A significant driver for the proposed land use change is to expand job producing land uses in the eastern portion of Moreno Valley. The General Plan Amendment is expected to facilitate improvement in the existing low jobs to high housing imbalance. The shift in land use creates opportunity for a better positive ratio in overall future City revenue to cost figures; given residential land uses typically create a higher demand and cost for city services compared with non-residential industrial uses. The project and its potential for job creation, as envisioned, could substantially benefit the established, but currently under performing, commercial/retail developments located west of the project area. The project may provide momentum, need and interest for future office and hospitality land use development in other areas of the City.

The proposed Open Space land use changes would provide consistency and compatibility with the existing Open Space land use and established wildlife habitat areas. The project area proposed as Open Space, south of the southern edge of the proposed new Specific Plan area, is consistent with policy assumptions and text added to the General Plan when it was last updated in 2006. Those assumptions and text changes were provided in recognition of the acquisition of over 1,000 acres in that area by the California Department of Fish & Wildlife and the Sempra energy company with the intended purpose to maintain them as open area.

Recommendation:

Staff recommends the Planning Commission recommend approval of the proposed modifications to General Plan text and maps to the City Council.

2. Change of Zone (PA12-0012)

Description

The proposed Change of Zone application submitted for the World Logistics Center (WLC) Specific Plan (2,610 acres) and areas outside and south of the WLC Specific Plan boundary (1,208 acres) will replace zoning predominantly for land currently within the Moreno Highlands Specific Plan, as well as some properties in the project area that are not included in the Moreno Highlands Specific Plan. The proposal will change land use residentially zoned RA2 (96 acres), R3 (133 acres), R5 (60 acres), and R5/R10 (9 acres) and land use established within a Planned Residential Community that included Residential Development (1,359 acres), Golf Course and Open Space (702 acres), Neighborhood Commercial (10 acres), Cemetery (16.5 acres) and Public (348 acres) and a Planned Business Center that included Business Park (361 acres), Mixed Use

(80.5 acres), Community Commercial (16 acres), Open Space (78 acres) and Public Facilities (67 acres). The newly proposed zoning within the Specific Plan boundaries, which would allow for primarily industrial warehouse and ancillary uses, would be consistent with proposed land uses established within the proposed WLC Specific Plan. Proposed modifications in land use and zoning are consistent with the proposed General Plan land use amendments and allow for a small variety of industrial related land uses including high cube logistics warehouse uses, ancillary office uses, self-storage and vehicle storage uses. The Open Space or OS zone, which includes a 74.3 acre area in the southwestern portion of the Specific Plan, would remain as open space.

Analysis

The Change of Zone (PA12-0012) request proposes to establish Logistics Development (LD), Light Logistics (LL), and Open Space (OS) zoning designations for a proposed warehouse/logistics master planned project on an approximately 2,610 acre portion of land within the WLC Specific Plan. Zoning proposed within the Change of Zone application would be consistent with that which is proposed within the Specific Plan for the project. Specific zones would include Logistics Development or LD proposed for approximately 2,384 acres allowing for high cube warehouse uses to include buildings with a minimum square footage of 500,000 square feet. Ancillary office uses would also be a permitted land use within the category. Logistics support uses to include motor fuel sales and related retail sales when operated in connection with a primary fuel operation use are also permitted within the zone. The Light Logistics or LL zone, which is included as part of an approximate 37 acres of the Specific Plan, would allow for warehouses buildings and related ancillary uses less than 500,000 square feet with no minimum square footage requirement. A 74.3 acre site in the southwestern portion of the Specific Plan is proposed as Open Space (OS).

The proposal will also include zoning modifications outside the WLC Specific Plan Area that was originally included within the Moreno Highlands Specific Plan (MHSP). This will include a zone change to Open Space (OS) for areas to the south of the WLC Specific Plan which includes primarily the 910 acre California Department of Fish and Wildlife (CDFG) land that is provided for habitat use and the 174 acre San Diego Gas and Electric properties which are primarily used as an open space noise attenuation buffer area around their property. The 20 acres of land owned by SDG&E and the Southern California Gas Company currently used for natural gas facilities is zoned for Public Utility use and is not a part of the WLC Specific Plan or a component of the request to modify zoning outside of the WLC Specific Plan boundary. Permitted uses under the OS zone would include agricultural uses, animal raising, police stations, museums, wholesale and distribution plant nurseries, and parks, while conditionally permitted uses would include equestrian centers, day care centers, golf courses, open air theaters, and public utility stations/yards.

As a result of the proposed project, the 3,038 acre Moreno Highlands Specific Plan will be repealed and replaced with the WLC Specific Plan and proposed Open Space (OS) land use and zoning designations south of the WLC Specific Plan boundary. A remnant 16.5 acre parcel included in the Moreno Highlands Specific Plan located north and east

of Gilman Springs Road is not included in the WLC Specific Plan or in an area included within the overall project area. Land use designation of Open Space (OS) would remain if the WLC project is approved. The remnant 16.5 acre parcel of land leftover from the proposed repeal of the Moreno Highlands Specific Plan will establish consistency with the General Plan Open Space designation, and staff will present this consistency modification at a later date. Pursuant to Government Code Section, 65860c, "in the event that a zoning ordinance becomes inconsistent with a general plan by reason of amendment to the plan, or to any element of the plan, the zoning ordinance shall be amended within a reasonable time so that it is consistent with the General Plan as amended."

Recommendation:

Staff recommends the Planning Commission recommend approval of the proposed Change of Zone to the City Council.

3. Specific Plan (PA12-0013)

Description

Government Code Section 65450 establishes that a Planning Agency may prepare a specific plan for the systematic implementation of the General Plan for all or a part of the area in the City covered by the General Plan. The WLC Specific Plan would serve as that implementation tool for a large portion of the currently undeveloped eastern portion of the City.

The proposed World Logistics Center (WLC) Specific Plan is a master plan for the development of up to 40.6 million square feet of high-cube logistics warehouse distribution facilities and related ancillary uses. The proposed project includes a 2,610 acre Specific Plan to implement future development and establish comprehensive land use regulations governing the proposed project, including zoning, project infrastructure, location of public improvements such as a required fire station, permitted uses and development standards in each of the zones (primarily industrial warehouse uses), building architecture (including building form/massing and façade treatments), street configurations (including roundabout locations), landscape guidelines, multi-use trail configurations and project phasing.

Analysis

The Specific Plan establishes sixteen (16) separate planning areas for future development. Exhibit 2-1 in the Specific Plan document serves as the land use plan. The Exhibit shows the sixteen planning areas numbered as 1-12, 20-22, and 30. The Exhibit contains further details with regard to size of each planning area, land use category for each planning area, and anticipated square foot of building development for each planning area. As plot plans for industrial development have not been submitted at this time, the Plan will act as an implementation tool that will provide development standards and allow for future build out of fifteen (15) of the planning areas within the Specific Plan boundary area. The sixteenth planning area is designated for Open Space

purposes. It is anticipated that development of the project would occur over time in the form of multiple separate independent projects of varying sizes and configurations. Each of these future projects would be required to be consistent with the General Plan and zoning and would comply with all applicable regulations of the Specific Plan.

The Specific Plan identifies the type and intensity of land uses permitted within the project. For example, the Logistics Development or “LD” land use district will allow for larger high cube logistics warehouse buildings (500,000 square feet or greater) with ancillary office uses as well as facilities for vehicle and container storage, cellular transmission facilities, construction yards, a motor fuel facility and public utility uses. The Light Logistics Support or “LL” category allows for such uses as smaller high cube logistics warehouse buildings (500,000 square feet or less), self-storage uses, vehicle and container storage, construction yards within or immediately adjacent to construction sites, cellular transmission facilities and public utility uses. Proposed Open Space or OS zoned areas will be designated for the 74.3 acre parcel located in the southern area of the WLC Specific Plan site as well as parcels outside and south of the WLC Specific Plan boundary down and adjacent to the San Jacinto Wildlife area. All uses and development within the OS designation areas shall comply with the standards, guidelines, and procedures set forth Section 9.06.030 of the City Municipal Code.

In order to provide greater compatibility between current residential land uses that are included west of the project site and proposed industrial land uses, the applicant has proposed a buffer area considered as a 250 foot edge treatment area that will be established to create buffers between the project site and adjacent existing land uses. Two distinct buffer or edge treatment areas will occur within the project site, including the Redlands/Bay/Merwin/Street D edge located on the north portion of the project site adjacent to existing residential properties located west of the Specific Plan boundary near Redlands Boulevard, and the San Jacinto Wildlife area edge located outside and south of the WLC Specific Plan boundary area. The San Jacinto Wildlife area edge is located on the southern portion of the project site currently adjacent to designated wildlife areas. This area will include a restricted use area of at least 250 feet from state owned property. In addition to the 250 foot restricted area, additional setback will be provided such that all buildings are a minimum of 400 feet from the San Jacinto Wildlife Area.

A phasing plan is included within the Specific Plan. Project phasing and development within the Specific Plan is expected to occur in two large phases, starting in the western portion of the site south of Eucalyptus Avenue and progress easterly and southerly. The phasing concept is based on beginning construction where infrastructure presently exists and expanding to the south and east. The first phase will include development primarily in the western portion of the Specific Plan, with final phases of development on the eastern portion of the project. As analyzed in the environmental document, it is anticipated that the first phase of development would be completed by the year 2022, and could achieve 50% of the entire project or approximately 20,300,000 square feet of logistics warehouse development. The second phase is anticipated to be completed by 2030 and include the remaining 50% of the project or 20,300,000 square feet of warehouse development. The projected time lines were based on the project starting development in 2015, and the actual build out years provided could fluctuate dependent

upon various conditions. The actual timing of development will be dependent upon numerous factors, including interest by building users, private developers and local, regional, and economic conditions. A Development Agreement, which is discussed in more detail later in this report, has also been requested by the applicant as a means to secure long term vesting of the approvals. The Development Agreement contains provisions that are intended to motivate timely development of the project, along with negotiated public benefits that would apply with, and some without, progress in physical development.

In securing a new specific plan for the WLC project, the existing Moreno Highlands Specific Plan would be repealed. The Moreno Highlands Specific Plan includes 3,038 acres and was approved for approximately 7,763 residential dwelling units and approximately 603 acres of Business Park, retail, residential, open space, and public/institutional land uses. A Development agreement for the Moreno Highlands Specific Plan expired on September 12, 2012.

Recommendation:

Staff recommends the Planning Commission recommend approval of the proposed Specific Plan and repeal of the existing Moreno Highlands Specific Plan to the City Council.

4. Pre Zoning/Annexation (PA12-0014)

Description

The WLC Specific Plan Area includes a triangular shaped 85 acre area of land (made up of two separate parcels) west of Gilman Springs and north of Alessandro Boulevard that is currently within the County of Riverside jurisdiction. The area is within the City of Moreno Valley Sphere of Influence, and the applicant has demonstrated that they hold a legal or equitable interest in the property. A pre-zoning/annexation application has been submitted by the applicant to incorporate the two parcels of land into the City of Moreno Valley. This project proposes to pre-zone the property as Logistics Development (LD) within the proposed Specific Plan, and it is anticipated that the zoning would carry forward with the intended subsequent annexation.

Analysis

The project includes completion of the annexation process for an approximate 85-acre area located on the north side of Alessandro Boulevard at Gilman Springs Road within the County of Riverside. The first step has already been provided to make this parcel part of the City, as the parcel has been included in the City's Sphere of Influence since 1985. The proposed WLC project furthers the annexation with General Plan land use designations and pre-zoning for this parcel, with the intent to incorporate the property into the World Logistics Center Specific Plan. The proposed annexation follows a logical path of City property located on the west side of Gilman Springs Road.

The annexation of additional land in the City's sphere will require review and approval by the Riverside County's Local Area Formation Commission (LAFCO). The current review of the area to be annexed and approval of the tentative map would establish "pre-zoning" of the area in advance of the final annexation action by LAFCO. The proposed annexation is reviewed by the agency once the environmental analysis has been certified and the project is approved by the City and an application is submitted.

Recommendation:

Staff recommends the Planning Commission recommend to the City Council approval of the proposed Pre-zoning of the identified 85 acres, consistent with zoning described in the WLC Specific Plan, for future annexation of the property into the City of Moreno Valley.

5. Tentative Parcel Map (PA12-0015)

Description

Tentative Parcel Map No. 36457 proposes the subdivision of a portion of the project site into separate large parcels for financing and conveyance purposes. The tentative parcel map identifies twenty-six (26) parcels within the World Logistics Specific Plan area. This map does not create any development rights for the subdivided properties. Subsequent subdivision applications will be required to be processed, approved and recorded prior to the development of any future buildings on the properties within the WLC Specific Plan area. The tentative map along with the pre-zoning/annexation application will also serve as the mechanism for including the resulting 85 acre parcel, within the proposed map, which is currently within the County of Riverside jurisdiction, to be subsequently annexed into the project site and the City of Moreno Valley.

Analysis

The proposed map is for financing and conveyance purposes only and does not create any development rights for the subdivided properties.

Recommendation:

Staff recommends the Planning Commission recommend approval of proposed Tentative Parcel Map No. 36457 to the City Council.

6. Development Agreement (PA12-0011)

Description

The applicant has requested a Development Agreement (DA) as part of the World Logistics Center (WLC) Specific Plan. The following are general considerations the Planning Commission should note with regard to a DA:

- A DA is a negotiation entitlement tool used to lock in (“vest”), for an extended/specified period of time, the underlying approved land use entitlements along with parameters for certain development regulations, fees, processing procedures, and policies, etc. that would be applied to subsequent development approvals in implementing the project and improvements which, in the absence of the DA, would be subject to periodic changes outside of the control of the parties.
- Authority/Approval – Per City Municipal Code Section 9.02.110(D)(2) a DA requires review through the Planning Commission with final action by the City Council. The Development Agreement is not a "required" approval for the World Logistics Center project. The General Plan Amendments, Zone Change, Specific Plan, Parcel Map, and pre-zoning for the 85 acre future annexation parcel can all be approved without an accompanying or subsequent Development Agreement. Approval of the DA is simply contingent upon mutual agreement of the parties entering into the agreement.
- In exchange for longer vested rights to the developer, through a DA the City seeks public benefits above and beyond any required developer obligations. The public benefits are not subject to a nexus finding and do not have to be directly associated with the development project.

The proposed Development Agreement was initially submitted by the applicant and has since been vetted through multiple negotiation sessions between the applicant’s team and City negotiation team. Both teams included legal representatives and used appropriate technical and fiscal expertise as warranted to perform a thoughtful, comprehensive assessment of the elements structured in the DA. The recommended Agreement represents the collective interests of both parties to provide for the future timely and efficient development of the project. As the applicant does not own all parcels within the proposed 2,610 acre WLC Specific Plan project area, only those properties that the applicant has demonstrated a legal or equitable interest in (2,263 acres) within the boundaries of the WLC Specific Plan area are subject to the DA.

With a Development Agreement, the determination by the Planning Commission, and subsequently the City Council which has the approval authority for the DA, is whether or not the anticipated public benefits of the project coupled with the additional public benefits established in the DA are a fair exchange in allowing for the longer term vested development rights for the applicant. In negotiating the DA, it was noted that the WLC project presents a unique opportunity to expand the City’s property and sales tax, generate construction employment and new permanent employment opportunities for Moreno Valley residents, and thereby reduce the present jobs and housing imbalance that exists in the City.

Analysis

The following are key provisions in the DA:

Term: The DA would be up to a 25-year agreement. The initial Term would be for fifteen (15) years, and provisions are included for a ten (10) year extension. Specifically, Section 3.5 of the DA states that the Term will not be extended for the additional 10 years unless within the first 15 years at least 8,000,000 square feet of occupied development is achieved and a payment of \$1,000,000 is made to the City, or 12,000,000 square feet of occupied development is achieved, in which case no additional payment would be due to the City. If less than 8 million square feet is achieved the DA would terminate at the end of the 15th year.

Development Impact Fees ("DIF"): The developer will be obligated to participate in the City DIF programs included in Section 1.5 of the DA. The definition includes the current DIF categories in the City's current Municipal Code; traffic and fire DIF are excluded in lieu of other DA provisions that ensure developer commitments to traffic and fire station infrastructure. Section 4.7.1 of the DA includes language to ensure any future increases to DIF will be applied at the time of development.

Payments and Reimbursements: Payments and reimbursements for infrastructure, including any oversized and/or accelerated infrastructure put in place by the developer, will be processed in accordance with the current provisions of Section 9.14 of the City Municipal Code. This is addressed in Section 4.8 of the DA. No unique or specialized provisions for reimbursement are included within the DA that are not typically available to other development projects.

Fire Station and Equipment: Highland Fairview shall, at its own cost, provide a fully constructed, fully equipped "turnkey" fire station and fire station site, including fire equipment, as specified by the City's Fire Chief. The fire station's furniture and fixtures shall be reasonably comparable to those of the most recently completed fire station within the City. The fire station, equipment and trucks shall be provided as and when directed by the Fire Chief. This is included in Section 4.9 of the DA.

SR-60 Enhancements: Highland Fairview will contribute up to \$500,000 to be used to develop landscape, signage, and bridge architectural guidelines for SR-60 between Redlands Parkway and Gilman Springs Road, based on a 10:1 match of City funds budgeted for the same. This is included in Section 4.13 of the DA. It is noted that this provision will require allocation up to \$50,000 of City funds in order to gain the full developer contribution.

Force Majeure: Force majeure provisions in the DA were expanded to cover economic or environmental/physical conditions (such as lack of utilities) that could arise and be beyond Highland Fairview's control which would make development uneconomic or infeasible. If any such events shall occur, the Term of the DA shall be extended for the duration of each such event, provided that the Term shall not be extended under any circumstances for more than three (3) years regardless of the number or length of individual extensions. This is included in Section 11.9 of the DA.

Local Hiring and Education, Library, Training and Workforce Development Funding: Highland Fairview will participate in the new City Council approved Hire MoVal Incentive Program. In addition, to ensure residents of Moreno Valley are provided education resources and obtain every opportunity to secure the jobs which will be created by the operation of the World Logistics Center, Highland Fairview will contribute up to \$6,993,000 towards education and training programs tied to the logistics industry. The funds related to these provisions will begin to flow in to the City immediately with an initial \$100,000 payment, and subsequent \$100,000 annual payments for the next 6 years. At year seven the annual payments increase to \$125,000 through buildout. One million dollars (\$1,000,000) is to be contributed by Highland Fairview at the issuance of the first building permit for a logistics building on the Subject Property and \$0.11/square foot to be paid at the time of the issuance of the building permit for each succeeding building, excluding the fire station. The provisions are included in Sections 4.11 and 4.12 of the DA.

Public Benefits: Exhibit No. A-3 was included in the DA to clearly identify the full list of Public Benefits that will result with approval of the DA.

Recommendation:

Staff recommends the Planning Commission recommend approval of the proposed Development Agreement to the City Council.

KEY PROJECT CONSIDERATIONS

The following is a discussion of the project area and how the proposed Specific Plan has been developed in a considerate fashion in light of the opportunities and constraints presented by the project environs, with both local and regional focus.

Site

The project area is predominately vacant, undeveloped, and marginal agricultural land. There are seven occupied residential single-family homes with associated ranch/farm buildings in various locations in the project area, but are not all contiguous properties. Established single-family development and subdivisions are located west of the project area just west of Merwin Street and south of Bay, and along the west side of Redlands Boulevard between Bay Street and Dracaea. The Skechers high-cube warehouse facility is located west of Theodore and north of Eucalyptus immediately outside of the project area.

The 3,038-acre Moreno Highlands Specific Pan (MHSP), is currently in place and constitutes the land use and development regulations for the majority of the project area. Land use and development regulations for those properties within the project area but outside of the MHSP are established in Title 9 of the City Municipal Code. The MHSP is a master planned, mixed-use community concept consisting of up to 7,763 residential dwelling units on approximately 2,435 acres and approximately 603 acres of business, retail/commercial, institutional, and other uses. Development within the

specific plan area has been essentially non-existent since the Specific Plan was approved in 1992. The development agreement approved with the MHSP expired in 2012.

Surrounding Area

Surrounding developed industrial properties in the vicinity of the proposed project include the 1.8 million square foot Skechers and 800,430 square foot Aldi warehousing logistics and distribution centers located south of State Route 60, west of Theodore Street and west of Redlands Boulevard respectively. Several residential neighborhoods have developed along Redlands Boulevard to the west and south of the western boundary of the proposed WLC Specific Plan. An area of the City known as “Old Moreno” is situated near the southwest portion of the project site, around the intersection of Redlands and Alessandro Boulevards. The major roadways that provide access to the project area are SR-60 to the north, Redlands Boulevard to the west, Alessandro Boulevard which traverses the site east-west, Gilman Springs Road to the east, and Theodore Street which traverses the site north-south. Redlands Boulevard and Theodore Street are north-south arterial roadways that intersect with SR-60. The Moreno Valley Ranch residential community and Golf Club is located approximately one mile southwest of the project area.

Limited development has occurred adjacent to the eastern and southern boundaries of the project, which include the “Badlands” to the east and the San Jacinto Wildlife Area to the south. Gilman Springs Road serves as the eastern City boundary and areas on the east side of the road are within the City’s sphere of influence. There are approximately ten (10) large custom single-family homes in the area east of Gilman Springs Road near the project site. The Badlands Sanitary Landfill, operated by the County of Riverside Waste Management Department, is located approximately 1.5 miles northeast of the project area.

Immediately south of the proposed project is the San Jacinto Wildlife Area (SJWA), Mystic Lake, and the Lake Perris State Recreation Area. These lands are state-owned and access is restricted. The SJWA is owned and operated by the California Department of Fish and Game (CDFG) and contains approximately 20,000 acres of restored wetland and ponds. The Lake Perris State Recreation Area is owned and operated by the California State Parks Department and contains approximately 6,000 acres of open space land, which is used both for recreation and preservation.

The closest large-scale commercial/retail developments are located south of State Route 60 at Moreno Beach Drive, approximately 1.25 miles to the west of the proposed project, and south of State Route 60 at Nason, approximately 1.5 miles to the west of the proposed project area. These shopping complexes include the Moreno Valley Auto Center, Walmart, Target and the Stonegate Center along with a variety of restaurants and ancillary commercial and service uses.

Access/Parking

The revised General Plan Circulation Element and the Specific Plan's Circulation Plan provide a framework for the movement of vehicles in and around the World Logistics Center project area. The Specific Plan document provides details on the road/street designations, right-of-way design, and road improvement thresholds. Access and parking for future developments on the individual parcels would be reviewed and approved against these regulations under their respective separate plot plan reviews.

Access to the World Logistics Center Specific Plan area is expected to be through the Theodore Street/SR-60 interchange, Eucalyptus Avenue (between Redlands Boulevard and Theodore Street), Gilman Springs Road at Alessandro Boulevard, and through the proposed extension of Alessandro to Cactus Avenue. Within the Specific Plan area the circulation system is essentially a loop system off of the Theodore Street backbone. The interior arterials will connect through three roundabouts to control traffic flow. The circulation system is intended to direct truck traffic access to Theodore Street from Highway 60 and to a lesser degree Alessandro from Gilman Springs Road. The interior street network is also expected to accommodate bus access, pedestrian infrastructure and bicycle infrastructure.

Due to the anticipated truck traffic within the proposed Specific Plan, the Master Plan multi-use trails have been laid out to avoid the interior loop roads by routing from Redlands Boulevard around Eucalyptus, Street B, Street F, Alessandro Boulevard, to Cactus and back to Redlands Boulevard. The Plan proposes a trail connection around the Old Moreno neighborhood along Bay Avenue and Merwin Street. The proposed Cactus Avenue trail would continue east at the base of the hills to connect to Davis Street and the San Jacinto Wildlife Area.

As included in the WLC Specific Plan, all future truck loading and parking areas for individual buildings and uses will be screened from public view and buffered by walls and dense landscape areas. In addition, vines shall be placed near walls along all designated truck loading/parking areas.

Design/Landscaping

Site design and architecture guidelines are included within the WLC Specific Plan and would be applicable to individual projects and plot plans submitted for subsequent development review and permitting. The design standards provide for compatible contemporary and sustainable designs that minimize resource and energy consumption. The Specific Plan establishes building height limitations throughout the project as described on Exhibit 5-3 Building Height Plan of the Specific Plan, with limits of 60 feet in areas designated as Area A and limits of 80 feet in Area B.

All buildings in the World Logistics Center that are 500,000 square feet or greater shall be designed to meet or exceed LEED Certified Building Standards. Building design under LEED would assist in reducing energy consumption by incorporating sustainable design features to further reduce the project's environmental footprint such as the inclusion of recycled building materials and the use of roof-mounted solar systems.

The Specific Plan includes landscape design standards for the project site that will ensure reduced consumption of water compared to conventional landscaping concepts. These regulations will meet goals of the Moreno Valley drought tolerant landscape ordinance. The Specific Plan contains an extensive palette of drought tolerant plants and requires individual development projects to install this drought tolerant landscaping and to utilize onsite runoff to irrigate landscaped areas. The Specific Plan calls for a substantial landscape treatment along the project area western boundary to provide an aesthetic buffer between the existing and future residential development and the planned warehouse buildings and truck activity areas. For areas not located along the western boundary, landscaped areas would be grouped by water needs and only utilize drip irrigation systems along Theodore and the perimeter of the project. The future design of the project will direct runoff to landscaped areas and employ techniques to promote percolation and water capture.

As part of the master plan design Section 4.2.4 of the Specific Plan identifies Special Edge Treatment Areas and Design Criteria. A 250 foot landscape edge treatment area will be established along the west and southwest portions of the project adjacent to existing and planned residential land uses. An additional setback is included in the southwestern portion of the area and along Gilman Springs Road. Land use restrictions within these areas would exclude items such as buildings, truck loading areas, truck circulation areas or truck/trailer storage uses. Items such as employee/visitor parking, emergency access and property maintenance for hardscape and landscape areas would be allowed in the buffer area. The San Jacinto Wildlife area edge is located on the southern portion of the project site currently adjacent to wildlife uses and will include an additional setback in addition to the 250 foot buffer area between the conservation area and buildings so that the minimum distance will be 400 feet.

Infrastructure Improvements

Development within the Specific Plan will require various infrastructure improvements. Local roadways and intersections necessitate by and/or impacted by project traffic will be constructed and/or improved. Electrical service would need to be extended from the Moreno Beach substation to the project area. Electric power lines along Gilman Springs Road would be relocated when that road is widened. Providing potable water to the site will require the construction of three new reservoirs, one north of SR-60 off of Theodore Street, one east of Gilman Springs Road near the northeast corner of the site, and one west of the project site off of Cottonwood Avenue. Gas and sewer lines will also be extended to the project site. The existing County drainage channel near the southwest corner of the site will be improved to handle increased flows from project runoff.

REVIEW PROCESS

On March 19, 2012, the proposed project was submitted to the Planning Division for review and processing. The project applications were deemed complete on April 18, 2012 with the exception of the rezoning/annexation and Development Agreement materials. The project was first reviewed by the Project Review Staff

Committee (PRSC) on May 23, 2012. At the above meeting date, specific items were required to be modified within the Specific Plan and Tentative Map documents. In addition, staff requested additional information be submitted to complete the application materials for the Annexation and Development Agreement.

On May 22, 2012, a public hearing was conducted and the City Council directed that all properties in the eastern portion of the City project area including those not owned by the applicant be included with the project.

The draft Specific Plan document was reviewed multiple times by internal staff to revise language within the Plan. Additional comments and corrections were made to the Specific Plan by staff regarding landscape, project setbacks and permitted uses in proposed land use zones. In addition, staff was involved with the development of the Draft Environmental Impact Report with the consultant LSA and Associates, and reviewed multiple drafts of the Final Environmental Impact Report to include revised responses to comments, mitigation measures and other key aspects of the document prior to completion of the final document.

The City of Moreno Valley Trails Board reviewed the WLC project trails configurations on January 23, 2013. In light of the subsequent deletion of 100 acres from the project area and a reduction in approximately 1 million square feet of building area, the Board reviewed the revised recreational trails for the project again on January 22, 2014, and recommended approval.

ENVIRONMENTAL IMPACT REPORT

Description

Based on scope of the project, a Program Environmental Impact Report (EIR) was prepared. Due to the large project size and expansive land area, proposed phasing of the project and limited information known about future development of industrial buildings, a programmatic EIR rather than a project EIR has been prepared. Allowances within the CEQA Guidelines will allow subsequent development project environmental review to tier off of this program level document when those subsequent development proposals are submitted.

Analysis

The City has adhered to the California Environmental Quality Act (CEQA) Guidelines in the environmental review of this project. Notice of completion and availability for public review of the draft environmental impact report (DEIR) document was circulated on February 5, 2013 with the comment period ending on April 8, 2013. This offered more than a 60-day review period, which exceeded the 45 day review period required by CEQA for a DEIR. In fact, the City accepted comments well past the 60-day review period for the project and those comments have been considered and included with the Final EIR.

The DEIR document was sent to numerous state and local agencies, adjacent property owners and other interested parties. Staff received approximately 144 comment letters and over 1,000 individual comments in relation to the public review period of the draft document. Subsequent to Draft Environmental Impact Report process and public comments, the project area has been reduced by approximately 100 acres and 1 million square feet.

All interested parties and responsible agencies had the opportunity to review responses to comments in the Final EIR that was mailed May 1, 2015 to all parties providing comment letters and other interested parties. This posting and circulation was 41 days in advance of this public hearing by the Planning Commission. The 41 days far exceeds the 10 day review period required by CEQA Guidelines. As was the case with the Draft EIR, the Final EIR in its final form was also provided for the public's review at City Hall, the public library and electronically on the City's website.

In briefly summarizing the key points of the document, analysis presented in the Draft EIR indicates that the proposed project will have certain significant environmental impacts to, Aesthetics, Air Quality, Land Use, Noise, and Traffic/Circulation as described in detail in both the Draft EIR and Final EIR that cannot be reduced to less than significant levels even with proposed mitigation in place. As identified in the document, cumulative impacts for the noted items above are considered to be significant and unavoidable for these five items. The EIR presented mitigation measures, which, to the extent feasible, will reduce project-specific and cumulative impacts for each of these items; however in some instances this did not reduce impacts below significant thresholds. All other environmental effects evaluated in the Draft EIR have been determined to be less-than-significant, or can be successfully mitigated below significant thresholds. All mitigation measures are included in the Mitigation Monitoring and Reporting Program established by the Environmental Impact Report.

As presented, the five (5) environmental impacts of aesthetics, air quality, land use, noise and traffic/circulation evaluated in the DEIR and FEIR remain significant and unavoidable and a cumulative impact even with mitigation measures provided. For aesthetics, Mitigation Measures (MM) 4.1.6.1 A through D have been included that provide plans prior to project development for maintaining a 250 foot setback area measured from the city zoning boundary line to any building or truck parking area, the inclusion of visual plans demonstrating screening of the project from existing residents and MM 4.1.6.2, 4.1.6.3 and 4.1.6.4 which include view protection of Mount Russell and light and glare restrictions/analysis of proposed solar panels for any future development. Mitigation measures for air quality include MM 4.3.6.2A through 4.3.6.2D, 4.3.6.3A, through 4.3.6.3E, and 4.3.6.4A which include measures such as the required inclusion of Tier 4 construction equipment, restriction of trucks that fall below 2010 engine emissions standards from entering project areas and limitation of truck idling to three (3) minutes all in an effort to reduce air pollutant emissions. For Noise, mitigation measures have been added for short-term construction noise levels as provided in MM 4.12.6.1 A through J to include the requirement of a Noise Reduction Compliance Plan, restrictions on grading during nighttime hours, potential sound barriers, as well as measures for long term traffic and operation noise to include MM 4.12.6.2A through 4.12.6.4A for the

requirement of building specific noise studies, the potential for sound walls and maintenance of buffer areas. The WLC Specific Plan also has been designed to direct truck traffic away from residential areas. Traffic/circulation measures include MM 4.15.7.4A through 4.15.7.4G which includes a traffic impact analysis, dedication of right of way consistent with the Subdivision Map Act for frontage street improvements and payment of Transportation Uniform Mitigation (TUMF) fees. Land use/Planning remains a significant and unavoidable project impact with no feasible mitigation measures available in regards to future development affecting seven single-family residential homes and the fact that the WLC Specific Plan cannot accommodate these residences within logistics warehousing areas.

Alternatives to the proposed project were analyzed in the EIR to include:

- **No Project/No Development** – Site would be void from development and remain in dry farming with some rural residential uses
- **No Project/Existing General Plan Alternative** - Includes land uses currently included on the City's General Plan (i.e. Moreno Highlands Specific Plan land uses).
- **Alternative 1: Reduced Density** – Site would include development of approximately 29 million square feet of logistics warehousing uses on the 2,610 acre WLC Specific Plan site.
- **Alternative 2 Mixed Use A Alternative** - Would result in 1,410 acres or 22 million square feet designated for logistics warehousing, 1,000 acres or 20 million square feet of light manufacturing, assembly or business park, 50 acres or 500,000 square feet of retail commercial, 100 acres or 1 million square feet of professional/medical offices and 150 acres of open space.
- **Alternative 3 Mixed Use B alternative** - Would be similar to the no project/existing General Plan Alternative, but with 10 million square feet of logistics warehousing on the 603 acres proposed for business, retail, institutional and other uses under the Moreno Highland Specific Plan.

Alternative sites for the project were also evaluated in the EIR. Due to the size and nature of the project, no feasible alternative sites were found in any of the eleven (11) jurisdictions evaluated. From the analysis of the five project alternatives, the environmentally superior alternative was Alternative 1 (Reduced Density), which is the only alternative that reduces traffic, air quality and related impacts by reducing the total square footage of warehousing by 30 percent. As stated in the EIR document, it was determined that Alternative 1 does not achieve the objectives to the degree of the proposed project and particularly does not meet most of the major project goals primarily because the project's industrial square footage is reduced by 30 percent.

Although impacts to aesthetics, air quality, land use, noise, and traffic/circulation cannot be reduced to less than significant levels, CEQA allows for a Statement of Overriding Considerations and findings to be prepared and considered. CEQA requires the decision making agency to balance the economic, legal, social, technological or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the proposed project. This would include project

benefits such as the potential creation of jobs, reduction of the jobs housing imbalance, increase in City revenue or other project benefiting aspects including the furthering of General Plan goals and objectives that can be weighed against project environmental impacts that cannot be mitigated to less than significant levels. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable” as allowed for under CEQA. The Statement of Overriding Consideration and corresponding findings are attached to the report as Attachment 2 for review and consideration.

The Planning Commission will have the opportunity to take public testimony on the draft FEIR and project and forward a recommendation to City Council. The review of the draft FEIR will include a recommendation to either certify or reject the document and Mitigation Monitoring Program along with the Statement of Overriding Considerations. The City Council will have the opportunity to review the final environmental document, receive public testimony and either certify or reject the EIR and subsequent Mitigation Monitoring Program and Statement of Overriding Considerations after a recommendation is rendered and forwarded by the Planning Commission.

Recommendation

With all required mitigation measures included in the Mitigation Monitoring and Reporting Program, and with inclusion of the Statement of Overriding Considerations which weighs benefits of the project against the potential project environmental impacts, certification of the EIR is recommended.

NOTIFICATION

All responsible agencies, interested parties and property owners of record within a 300 foot radius of the project area were provided a notice of the Planning Commission public hearing. In addition, the draft Final Environmental Impact Report was sent out to all responsible agencies, and interested parties that have requested to be placed on the mailing list. The public hearing notice for this project was posted on the project site in seven (7) separate prominent locations and the hearing notice was published in the local newspaper and regional version of the local newspaper on May 1, 2015 and May 4, 2015, respectively.

REVIEW AGENCY COMMENTS

Staff received approximately 144 comment letters and over 1,000 individual public comments in response to the circulated Draft EIR in early 2013. Comment letters and required response to comments for the Draft Environmental Impact Report (DEIR) are included in the final Environmental Impact Report (FEIR). This includes comments received during the designated 60 day comment period and those received after the comment period.

ALTERNATIVES

1. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment, Development Agreement, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map.
2. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map, but without a Development Agreement.
3. Deny the World Logistics Center project.
4. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment, Development Agreement, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map, with modifications specified by the Planning Commission.

STAFF RECOMMENDATION

That the Planning Commission:

APPROVE Resolution Nos. 2015-12, 2015-13, 2015-14, 2015-15 and 2015-16 thereby recommending that the City Council:

1. **CERTIFY** the Environmental Impact Report (P12-016), including approval of the Mitigation Monitoring Program and adoption of a Statement of Overriding Considerations (Exhibits A and B of Resolution 2015-12) for PA12-0010 (General Plan Amendment), PA12-0011 (Development Agreement) PA12-0012 (Change of Zone), PA12-0013 (Specific Plan), PA12-0014 (Pre-Zoning/Annexation), PA12-0015 (Tentative Parcel Map), pursuant to the California Environmental Quality Act (CEQA) Guidelines.
2. **APPROVE** General Plan Amendment PA12-0010, to change the land use designations for the project area to Business Park/Light Industrial (BP) and Open Space (OS), and to amend General Plan goals and objectives text and map in the respective Community Development, Circulation, Parks, Recreation and Open Space, Safety, and Conservation Elements identified in Exhibits A through M of Resolution 2015-13.
3. **APPROVE** Change of Zone PA12-012 and Specific Plan PA12-0013 and Annexation PA12-0014, which would repeal the current Moreno Highlands Specific Plan No. 212-1, would establish the World Logistics Center Specific Plan including Change of Zone on the City's Zoning Atlas to Logistics Development (LD), Light Logistics (LL) and Open Space (OS) for

areas within the proposed WLC Specific Plan boundary, would establish Pre-zoning/Annexation for an 85 acre site at the northwest corner of Gilman Springs and Alessandro Boulevard, and authorize Change of Zone on the City's Zoning Atlas to Open Space (OS) for those project areas outside and southerly of the new WLC Specific Plan boundary, Exhibits A, B and C of Resolution 2015-14.

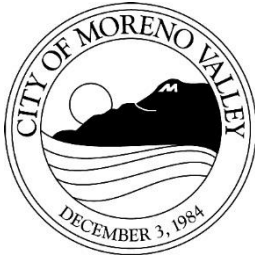
4. **APPROVE** Tentative Parcel Map No. 36457 PA12-0015 for a tentative parcel map that includes 26 parcels for financing and conveyance purposes, Exhibit A and B of Resolution 2015-15.
5. **APPROVE** Development Agreement PA12-0011 covering properties controlled by Highland Fairview, Exhibit A of Resolution 2015-16.

Prepared by:
Mark Gross
Senior Planner

Approved by:
Richard J. Sandzimier
Planning Official

ATTACHMENTS

1. Public Hearing Notice
2. PC Resolution 2015-12 EIR (combined)
3. PC Resolution 2015-13 General Plan (combined)
4. PC Resolution 2015-14 Change of Zone (combined)
5. PC Resolution 2015-15 with Map and COAs (combined)
6. PC Resolution 2015-16 Development Agreement
7. Final Environmental Impact Report
8. General Property Location Map
9. Aerial Map
10. General Plan Background Sheet
11. Letters of Correspondence
12. Responses to Correspondence
13. CC letter from CM Garcia dated 2-8-12
14. CC Report dated 5-8-12
15. Exhibit 2.1 Land Use Plan of the Specific Plan
16. Highland Fairview Property Ownership Map



PLANNING COMMISSION

STAFF REPORT

Meeting Date: June 25, 2015

PROPOSED WORLD LOGISTICS CENTER CONTINUED PUBLIC HEARING

Case: PA12-0010 (General Plan Amendment), PA12-0011 (Development Agreement), PA12-0012 (Change of Zone), PA12-0013 (Specific Plan), PA12-0014 (Pre-Zoning/Annexation), PA12-0015 (Tentative Parcel Map No, 36457), P12-016 (Environmental Impact Report)

Applicant: Highland Fairview Inc.

Owner: Highland Fairview and various private property owners

Representative: Iddo Benzeevi

Location: The project is in the eastern portion of the city and is more specifically located east of Redlands Boulevard, south of the SR-60 Freeway, west of Gilman Springs Road, and north of the San Jacinto Wildlife Area

Case Planner: Mark Gross

Council District: 3

SUMMARY

The applicant, Highland Fairview, has submitted multiple project entitlement applications for an approximate 3,818 acre project area in the eastern portion of the City. Collectively the project applications are referred to as the World Logistics Center (WLC) Project. The applications have been under review since March of 2012.

On June 11, 2015, the Planning Commission initiated a public hearing on the proposed WLC Project, which includes a General Plan Amendment (PA12-0010), Development Agreement (PA12-0011), Change of Zone (PA12-0012), Specific Plan (PA12-0013), Pre-zoning/Annexation (PA12-0014), Tentative Parcel Map No. 36457 (PA12-0015) and Environmental Impact Report (P12-016). As this is a large complex project with multiple legislative issues under consideration and extensive public interest, the public hearing was not able to be completed on June 11, 2015. During the first night of the public hearing, staff and applicant presentations were made, questions to staff and the applicant were asked by the Commission, and the public hearing was opened. Five of the approximate 100 speakers who filled out requests to speak were able to make their public testimony before the meeting was ended and public hearing continued. The hearing was continued to June 25, 2015, in the City Council Chambers, at City Hall. The start time of the continued public hearing was set for 5:00 p.m. at which time the public comments portion will resume.

To provide clarification to the public on the hearing procedures the City issued a press release that was published on the City website within the WLC banner on the home page (Attachment 2).

Written comments received prior to the start of the Planning Commission meeting on June 11, 2015 were provided in hard copy format to Commissioners at the meeting. Initial written staff responses to some of the comment letters, that could be prepared in advance of the hearing, were also provided to the Commission immediately prior to the meeting. Some additional written comments have been received since the June 11, 2015, meeting. All the written materials which have come in as letters or emails include correspondence from public agencies as well as interested parties from the general public. A total of 70 comment letters and e-mails have been collected since the public hearing notice was issued on May 1, 2015 up to the time of preparation of this staff report. All these correspondence received are attached hereto as Attachment 1 for review by the Commission and public. All of the comments are under consideration and staff will be prepared to provide responses to the Commission as requested by the Commission. Full consideration of the comments will also be provided subsequently to the City Council.

This staff report is submitted as additional information. All other pertinent project information, exhibits, and recommendations remain unchanged and are included in the original staff report distributed for the June 11, 2015 meeting. These materials can be accessed and/or viewed on the City website by viewing the June 11, 2015 posted Planning Commission Agenda Packet.

ALTERNATIVES

The following alternatives were included in the June 11, 2015 Planning Commission staff report and are repeated here for ease of reference:

1. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment,

Development Agreement, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map.

2. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map, but without a Development Agreement.
3. Deny the World Logistics Center project.
4. Recommend that the City Council Certify the Environmental Impact Report and approve the World Logistics Center project including a General Plan Amendment, Development Agreement, Change of Zone, Specific Plan, Pre-Zoning/Annexation, and Tentative Parcel Map, with modifications specified by the Planning Commission.

STAFF RECOMMENDATION

APPROVE Resolution Nos. 2015-12, 2015-13, 2015-14, 2015-15 and 2015-16 thereby recommending that the City Council:

1. **CERTIFY** the Environmental Impact Report (P12-016), including approval of the Mitigation Monitoring Program and adoption of a Statement of Overriding Considerations (Exhibits A and B of Resolution 2015-12) for PA12-0010 (General Plan Amendment), PA12-0011 (Development Agreement) PA12-0012 (Change of Zone), PA12-0013 (Specific Plan), PA12-0014 (Pre-Zoning/Annexation), PA12-0015 (Tentative Parcel Map), pursuant to the California Environmental Quality Act (CEQA) Guidelines.
2. **APPROVE** General Plan Amendment PA12-0010, to change the land use designations for the project area to Business Park/Light Industrial (BP) and Open Space (OS), and to amend General Plan goals and objectives text and map in the respective Community Development, Circulation, Parks, Recreation and Open Space, Safety, and Conservation Elements identified in Exhibits A through M of Resolution 2015-13.
3. **APPROVE** Change of Zone PA12-012 and Specific Plan PA12-0013 and Annexation PA12-0014, which would repeal the current Moreno Highlands Specific Plan No. 212-1, would establish the World Logistics Center Specific Plan including Change of Zone on the City's Zoning Atlas to Logistics Development (LD), Light Logistics (LL) and Open Space (OS) for areas within the proposed WLC Specific Plan boundary, would establish Pre-zoning/Annexation for an 85 acre site at the northwest corner of Gilman Springs and Alessandro Boulevard, and authorize Change of Zone on the City's Zoning Atlas to Open Space (OS) for those project areas

outside and southerly of the new WLC Specific Plan boundary, Exhibits A, B and C of Resolution 2015-14.

4. **APPROVE** Tentative Parcel Map No. 36457 PA12-0015 for a tentative parcel map that includes 26 parcels for financing and conveyance purposes, Exhibit A and B of Resolution 2015-15.
5. **APPROVE** Development Agreement PA12-0011 covering properties controlled by Highland Fairview, Exhibit A of Resolution 2015-16.

Prepared by:
Mark Gross
Senior Planner

Approved by:
Allen Brock
Community Development Director

ATTACHMENTS

1. PC COMMENTS (COMBINED).
2. WLC PC Public Hearing Guide posted 061515
3. PC Mtg 06.11.15 - Staff Report Packet
4. LSA Responses to Comments (combined)

06/06/15

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 18

City Council of moreno valley
14177 Frederick Street
Moreno Valley, California 92553

I dont live in moreno valley. I dont have any children yet. Yes i am active in the Community. It did affect my life. I think you guys should approve the world logistics center because they are helping our community out.

Sincerely, Jennifer
moreno valley Resident

[Redacted]

[Redacted]

[Redacted]

5/23/15

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 17

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street,
Moreno Valley, CA 92553

Dear council members,

I have lived in Moreno Valley for 2 years and I don't have a job. People here in this city need more jobs because we search and search but there's none. My husband sometimes commutes to Santa Ana CA to work but it's not enough. We need more jobs out here to better our city. This is going to benefit all residents and better our lives. Don't let this opportunity pass by because we all need this. Our families need this.

Sincerely,
Matilde Gutierrez
Moreno Valley Resident

Matilde Gutierrez

May 09, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 17

City Council of Moreno Valley
C/O City Hall/ Clerks' office
14177 Frederick street,
Moreno Valley, Ca. 92553

Dear Councilmembers

I am writing you to express my support for the World Logistics Center gets approval here in Moreno Valley. I enjoy living in Moreno Valley and want the best for the community and our family. The World Logistics Center will provide Moreno Valley with the opportunity to make huge and very needed changes to the city for living + work.

I have lived here for 15yrs. I know that Moreno Valley needs improvement + a boost in certain areas. The project will bring a ton of jobs. We have a ton of land and eager residents just waiting to work. The Logistics Center will help generate millions in fees giving the city more flexibility to fix the problems in the community.

When you consider how many people
communities in this city. The people
here need jobs in the World Logistics
Center. It just makes sense to
support this project.

I want the future residents for
years to come to have a better life
style. The next generation needs
stable career opportunities in town after
they finish their education.

Thank you for your time regarding
this World Logistics Center Project.

Sincerely,
Rose L. Watson



CITY COUNCIL
MORENO VALLEY
RECEIVED

11Jun15

15 JUL -6 PH 5: 20

Dear Councilmembers;

I'm writing to you in support of the World Logistic Center and have been a proud resident of the City of Moreno Valley since 2007. Many friends and residents that I am acquainted with work out in Irvine California and commute daily along the traffic driven 91 freeway. The WLC is an excellent opportunity not just for the city but its residents because it brings more locals jobs as well as additional income for the city. I would be more than happy to take a work pay cut in lieu of a shorter commute and traffic. I am an active member of the community and have coached many youth teams. Many parents and I appreciate the parks and recreation the city has to offer and additional funds from the WLC could hopefully open up additional parks for our children to play and compete in. We are a fast growing city and seriously need to take advantage of this opportunity before it is taken from us. Hopefully the council strongly considers this as many residence I are in accordance with the development.

Sincerely,



Art Ursulo

Moreno Valley, Ca 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 20

June 4, 2015

City Council of Moreno Valley
C/O City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members^o I would like more
Jobs here at moreno Valley, because moreno Valley
has the fewest Jobs in the Inland Empire.

Sincerely, ~~Kristopher~~ Garcia
Kristopher Garcia
Moreno Valley Resident

[Redacted]
Moreno Valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUN -18 -2015

15 JUL -6 PM 5: 20

City council of moreno valley
c/o city clerk's office
14177 Frederick st.
Moreno valley ca. 92553

Yo Heladio Beltrán estoy solicitando que ustedes den el permiso para que este proyecto de World Logistics Center se construya aquí en nuestra ciudad, ustedes saben que necesitamos mucho progreso en todas las áreas de nuestra ciudad, por favor ustedes pueden hacerlo posible.
Gracias por su cooperación

atentamente

Heladio Beltran

[REDACTED]
moreno valley ca. 92553

MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 20

Junio 2 - 2015

City Council of Moreno Valley
c/o City Hall / clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Honorables Consejales;

Mi nombre es Tersa Ramirez
Quiero pedirles que aprueben este proyecto
porque ya estoy cansada de que esten sacando
el trabajo a Mexico, Canada, China, y
nos estamos quedando sin trabajo por ejemplo
yo trabajaba en The Toro Company Irrigacion
en este. Que paso que se lo llevaron a
Juarez Mexico ~~and~~ me quede sin
trabajo tienen que dar la aprobacion para
este proyecto para que tengan nuestras
generaciones trabajo y no tanta criminali-
dad esta Ciudad es muy Linda pero
sin trabajo nada mas crece la delincuencia
por ejemplo: mi hijo hoy trabaja para
Amazon y lo hicieron permanente ~~h~~ si no
hubieran aprobado ese proyecto mi hijo
no tuviera trabajo piensen tanto joven
que sale de Moreno Valley High School
School y no tiene donde emplearse para

ganar dinero para que paguen su colegio por lo mismo les Supplico de la manera mas atenta que aprueven este proyecto de. yo vivo aki por 25 años Por eso quiero que aprueven este proyecto
Logestics Center Would

Gracias Anticipadas

Atentamente:

Teresa Ramirez

Teresa Ramirez

[REDACTED]
Moreno Valley CA 92553

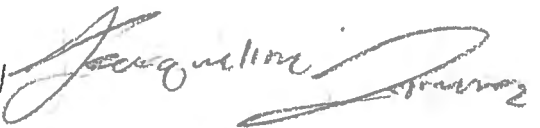
CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 19

June 4, 2015

City Council of Moreno Valley
CPC City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members: I think there should be more job opening for the people of Moreno Valley. That can help decrease the amount of homeless people living off of the street. This can be a small step in the journey of our City.

Sincerely, 

Moreno Valley Resident



Moreno Valley CA 92551

Jacqueline Jimenez

June 5, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

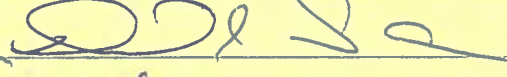
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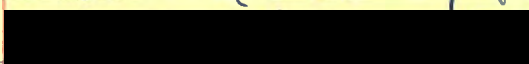
City Council of Moreno Valley
% City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley California 92553

Dear Council members:

I am writing today in support
of the project 'World Logistics Center'
I believe it will create employment
and much needed change in the
city of Moreno Valley.

Sincerely,

Imelda Santana 
Moreno Valley Resident


Moreno Valley CA 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

Junio 4, 2015

15 JUL -6 PM 5:19

City Council of Moreno Valley
c/o City Hall / clerk's office
14177 Frederick Street
Moreno Valley, California 92553

Señor Gutierrez

Mi nombre es Cruz y he vivido por 25 años en la ciudad de Moreno Valley, tengo cuatro hijos y ellos han batallado para encontrar trabajo en esta ciudad. A nosotros nos gustaria que hubiera más oportunidades de empleo para no tener que salir a buscar empleos a otras ciudades que estan muy lejos. El World Logistic Center nos beneficiaria a todos, porque habiendo trabajo, hay más dinero y ayuda a la economía.

Gracias por su tiempo

Atte: Señora Cruz BARAJAS

Moreno Valley CA. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUN -18-2015

15 JUL -6 PM 5: 19

City council of moreno valley
 c/o city clerk's office
 14177 Frederick st.
 Moreno Valley CA. 92553

les estoy escribiendo esta carta hoy para pedirles
 que agan todo lo posible para que este
 proyecto de world logistici center se
 aprueve y podamos mejorar NUESTRA ciudad,
 Necesitamos mucho este proyecto porque
 No es facil encontrar trabajo aqui, y
 No quiero irme a otra ciudad.
 Por Favor apoyenlo. gracias

Filemon H.

[REDACTED] HEWITT CA.

C 92543

June 6th 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:19

City Council of Moreno Valley
90 City Hall / Clerk's office.

14177 Frederick St
Moreno Valley CA 92553

I been live in Moreno Valley for 15 years
I work as a plumber. I have 3 boys
I am active in church & Sport

I work all over California state
I commuted abt. I don't have
enoug time to enjoy my family and
Community

I think the world logistics Center
project will help my community and Moreno
Valley city with jobs commutes, tax
revenue and foudn for every resident of
Moreno Valley.

Sincerely

Javier Falcón

Moreno Valley, CA 92553

May 15, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:20

CITY COUNCIL OF MORENO VALLEY
96 City Hall / Clerk's office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Council member

I LIVE HERE IN MORENO VALLEY SINCE OCT'81 & SO FAR WORLD LOGISTICS CENTER PROJECT(S) IS FAR BETTER THAN WHAT YOU GUYS PLAN. SINCE WE MOVED HERE.

THIS IS THE ONLY OPPORTUNITY TO MAKE THIS HAPPEN IN OUR CITY

I URGE YOU TO APPROVE THIS PROJECT.

IF YOU CAN MAKE THIS PROJECT HAPPENS, THEN I DO NOT HAVE TO COMMUTE TO WORK TO FONTANA.

Rosalind Tomanang

MORENO VALLEY, CA 92557

5/22/2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:19

City Council of Moreno Valley
Clerk's Office
14177 Frederick St.
Moreno Valley, CA 92553

Dear, Councilmembers:

I would like to tell you to hire more ^{people} to to work and make more jobs here in Moreno valley and not drive far to go to work and not be far away from there family and spend more time with them and not come home nightly when there kids are asleep say yes to World logistics center.

Sincerely,

Andrea Pelata

Moreno Valley Resident

[REDACTED]
Moreno Valley, CA 92551.

05-18-2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL 16 PM 5:19

City Council of Moreno Valley
c/o City Hall / Clerks Office
14177 Fredrick Street.
Moreno Valley California 92553

Minombre es Jose E Galicia
tengo viviendo en morano valley 13 años
trabajo en corona y considero sobre este
proyecto muchos beneficios para el futuro
de mis hijos y la comunidad. upollo el
proyecto que seme aprecentado la ciudad
de morano valley necesita proyectos
como este por que tendríamos nuevas
metas, nuevos trabajos y un futuro
distinto para nuestra ciudad, se benefe-
sarian ospitales escuelas y familias
enteras.

Jose E Galicia

[REDACTED]
Moreno valleys CA 92553



CITY COUNCIL
MORENO VALLEY
RECEIVED

June 4, 2015

15 JUL -6 PM 5: 19

City Council of Moreno Valley
C/o City Hall / Clerk office
14177 Frederick St.
Moreno Valley CA 92553

Hi my name is Brenda Preciado I have lived in Moreno Valley for 7 years I started my family here I have 2 children. I used to work as a Banker for Chase Bank. I wear active in a community church.

My husband is the one that commutes from here to Sun Valley it's about 2 hours away because here so sometime he does not come home to sleep and stays out there with his mother.

It affects us by not seeing him that much. I believe that with the World Logistics Center Project my husband to work out here. It would benefit the community by bringing jobs here. ~~Thank~~ Thank you.

Brenda Preciado

Moreno Valley
CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED


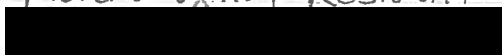
15 JUL -6 PM 5: 19

June 4, 2015

City Council of Moreno Valley
CPCG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I wish for more job opportunities in Moreno Valley because they only jobs at fast food places like McDonalds, Coldstone, or KFC. More jobs at Home Depot or more business type jobs. I wish to not work for minium wage so I can support myself and my family while California is struggling.

Sincerely,  Devan Chaney
Moreno Valley Resident

Moreno Valley CA 92551

June 6th, 2015

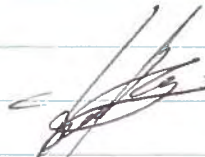
CITY COUNCIL
MORENO VALLEY
RECEIVED

City Council of Moreno Valley 15 JUL -6 PM 5: 18
14177 Frederick Street
Moreno Valley CA, 92553

I have been living in Moreno Valley for 11 years. I've seen no improvements in this city. There are 5 members of my family; my 19 year old daughter, 14 year old daughter, and an 8 year old son.

I'm supporting World Logistics Center because I want jobs closer to my city. I want the doors of opportunities to open, here in Moreno Valley, for my children.

I want their education to improve as well as the jobs. This project can propel so many benefits towards my children's future, educationally and economically. Moreno Valley needs a future.

 Israel Fragoso


Moreno Valley CA, 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 19

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Junio, 11 2015

Escribo esta carta para expresar mi apoyo al Centro Logístico, tengo 12 años viviendo en Moreno Valley, la razón que me moví aquí de Corona es porque las casas están más baratas, pero mi trabajo está allá y aquí no pude encontrar nada. Yo apoyo este proyecto porque creo que es una oportunidad para mis hijos, que no hagan y manejen lo mismo que yo. Que ellos tengan mejores opciones en esta ciudad, porque la realidad es que manejar a otra ciudad contaminamos más y gastamos mucha gasolina.

[REDACTED]
MORENO VALLEY, CA 92551JUAN C. QUIROZ
JC

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUNE 06 - 15

CITY CONCIL OF MORENO VALLEY
C/O CITY HALL/ CLERK'S OFFICE

15 JUL -6 PM 5: 19

ESTIMADOS MIEMBROS DEL CONSEJO

MI NOMBRE ES ERNESTO CARDENAS

TENGO BIBIENDO 12 AÑOS EN MORENO VALLEY

YA ESTOY RETIRADO SI ME AFECTO MUCHO LA
FALTA DE EMPLEO. AÑOS ATRAS Y LES ESTA
AFECTANDO A MIS HIJOS. Y ME GUSTARIA
QUE ESO CAMBIARA EN UN FUTURO POR LAS
NUEVAS GENERACIONES QUE TENGAN UN
MEJOR FUTURO

SIN SERA MENTE ERNESTO CARDENAS

 MORENO VALLEY CA. 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:19

June 6 2015

City Council of Moreno Valley
 c/o city Hall/clerk's office
 1417 Frederick Street
 Moreno Valley Ca 92553

Dr. Council members.

I have lived in Moreno Valley 10 years
 I approve this project because I feel that it is very
 much needed because there is a lot of poverty in
 the city and there a lot of homes that do not have
 an economic support. there are a lot of parent
 that need to commute. 70 to 90 minuetts out of there
 homes in order to provide food and shelter for there
 families so I urge you to approve the World
 Logistics Center.

Sincerely,

Claudia Avila

Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 19

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Ok. el proyecto del que me Acaban de Hablar me parece importante porque es algo que nos va a beneficiar a toda la familia de Moreno asi Genera muchas oportunidades de trabajo no tendremos que salir a Trabajar fuera de Moreno Valley. + dejar nuestros hijos solos todo el dia que Alguien los cuide. el generar empleo en todas las Areas en comercio + ventas. para nuestros hijo + no tengan que lidiar con el trafico
ojala + se lleve Acabo este proyecto que lo Necesitamos mucho. gracia.
Faustina Alcalá.

Moreno Valley ca. 92551

Mayo 31, 2015.

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PH 5:03

City Council of Moreno Valley
c/o. City Hall / clerk's office.
14177 Frederick Street
Moreno Valley CA 92553.

Honorables consejales:

Mi nombre es Luis Pérez. Compré casa en Moreno Valley hace 5 años. Y manejo todos los días y el tiempo que paso en el tráfico me gustaría estar en mi casa con mi familia es por eso que yo apoyo el proyecto de centro logístico mundial espero que Dios ponga en sus corazones el por que necesitamos que apoyen el proyecto.

Gracias.

Sinceramente

Luis Pérez

Moreno Valley.
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 02

6/2/15

City Council of Moreno Valley
90 City Hall/Clerk's office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Councilmembers,

My name is Sandra Portillo, and I am writing this letter to support the World Logistic Center, because as a mother and housewife I greatly support this project, I believe this will benefit the whole city of Moreno Valley, to progress, to get more jobs, more taxes for schools. I think is a great idea to approve it. Everything it will be better economically for our city. I support with all my heart this project and truly wish this project to become a reality for our families and community of Moreno Valley

Sincerely,



5-2-15

Moreno Valley Ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5:02

June ~~15~~¹¹, 2015

City Council of Moreno Valley
CPO City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

Bring the World Logistic
Center to Moreno Valley! We need
jobs and less traffic.

Sincerely,

Moreno Valley Resident



Moreno Valley CA 92553

Shanna Green
Shanna Green

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5:02

May 31, 2015

City Council of Moreno Valley
c/o City Hall/Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Dear councilmembers:

Me dirijo a ustedes como líderes de Moreno Valley para decirles que apoyo el proyecto de Moreno Valley's Window into the Future. Este proyecto dará un gran apoyo a nuestra Ciudad através de trabajos y dará una nueva imagen a nuestra Ciudad.

Sinceramente - Maria Caixba
Maria Caixba

[REDACTED]
Moreno valley, Ca. 92553

6-6-2015

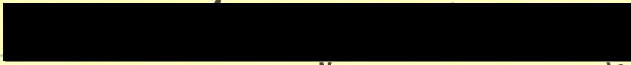
CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5:02

City Council of Moreno Valley
c/o city Hall / clerk's office
14177 Frederick Street
Moreno Valley CA 92553

I have lived in Moreno Valley 29 years.
We have 2 grown children and 5 grandchildren.
I am an orthodontic RDA. I am very active
in my church ST. Patrick. My children in
sports. I have commuted to Riverside
for 29 years. I think the world logistic
center is very important for Moreno Valley.
If Riverside could do it they would.
They are already building on the 215
and no one is saying No to that.

Sincerely
Sandy Hanlon


Moreno Valley CA
92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUN 3 - 2015

15 JUL -7 PM 5:02

City Council of Moreno Valley
c/o City Hall/Clerk's Office
Moreno Valley CA. 92553

Por medio de la presente escribo esta carta, para que hagan todo lo posible para que este proyecto de World Logistic Center. En Moreno Valley es una gran necesidad que tiene los habitantes de esta ciudad es de suma importancia para todas las familias que tenemos una gran necesidad de trabajos cerca de nuestras casas, estoy muy cansado de estar viajando a un lugar tan lejano y dejar tanto tiempo a mis hijos, familia.

Atentamente:

Adrian Bojorquez

Moreno Valley CA 92551

June 6th, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 02

City Council of Moreno Valley
40 City Hall / clerk's office
14177 Fredensck St.
Moreno Valley, CA 92553

I been live in Moreno Valley for 5 years
My Occupation as Medical Assistant
I have 2 kids
I am active in Church & Sport

To go to work to L.A county
I commuted 2 hour one way
and I don't have enough time
to enjoy my family and the community

I think the World Logistics Center
project will help my community
and moreno Valley city with jobs
commutes, tax revenue and found
for every resident of Moreno Valley

Sincerely

Juana Falcon

Moreno Valley CA. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 02

6-3-15

City Council of Moreno Valley
C/O City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA. 92553

I am writing to you today on the date 6-3-15
to ask that you work to make sure the World
Logistic Center gets approval here in Moreno
Valley thank you for your time

Saul Heredia.

Att: 


Moreno Valley C.A. 92551.

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 02

June 11, 2015

City Council of Moreno Valley
CPO City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

Hello, as a Resident of Moreno Valley,
I am for the WLC. This will help the
residents financially and help the city
economically. Yes to the World Logistics Center.

Please! and Thank You!

Sincerely, ~~Lauren Noyes~~
Lauren Noyes
Moreno Valley Resident[REDACTED]
Moreno Valley CA 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 02

June 11, 2015

City Council of Moreno Valley
CPC City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

Help fix this City and build
the World Logistics Center. We all will
benefit from this project, especially the residents
and the City. Please Build!

Sincerely, Cristina Valadez
~~Cristina Valdez~~
Moreno Valley Resident[REDACTED]
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:20

5/30/15
City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street,
Moreno Valley, CA 92553

Dear Councilmembers;

I'm writing this letter to support
~~the~~ construction of World Logistic
Center because it will give us
opportunities of jobs close to
home. Also it ~~will~~ will benefit the
future of kids that are now
little but soon ~~will~~ ~~be~~ they will
be in need of jobs. My husband
has to commute everyday for
1 hour and a half to get to his
work. I think we deserve better
lives and future.

Sincerely,

Maria Eva Lopez

Moreno Valley Ca
92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 20

June 2, 2015

City Council of Moreno Valley
100 City Hall/Clerk's office
14177 Frederick St.
Moreno Valley Ca 92553

Dear Council Members:

Please, Please, Please, approve the World Logistics Center. We as residents have to work more than one-two jobs, in order to supplement income. If I were to take logistic classes now, I would be able to qualify for open positions. Then I would only need one job to take care of my family.

Any extra time I could spend with my family is worth having. We really need close jobs near by and that would help eliminate traffic. Again please allow the residents the opportunity to apply and do better for themselves and their families.

Sincerely, Jacke Browne
Jacke Browne
Moreno Valley Resident

Moreno Valley Ca 92551

To

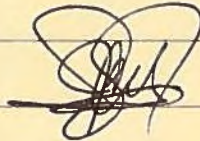
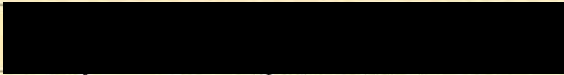
CITY COUNCIL
MORENO VALLEY
RECEIVED

6-1/15

15 JUL 15 PM 5:20
Council of Moreno Valley
c/o City Clerks office
14177 Frederick St.
Moreno Valley CA. 92553.

Respetable señores del consilio.
yo Juan Carlos Ayala.
Les pido de favor. que apoyen a
World Logistics Center.
Es un proyecto que va a beneficiar
mucho a la ciudad de Moreno Valley.
y a la Comunidad entera con mas
fuentes de trabajo.

Juan C. Ayala



Moreno Valley CA. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 20

May 30th, 2015

c/o City Hall / Clerks office

14177 Frederick Street,

Moreno Valley, California 92553

Dear Councilmember's;

I've lived in Moreno Valley for many years and made lots of close friends but it was hard finding work there so I had to drive out to find work with the rising cost of gas my best choice was to move closer to my work in doing so grew further away from my friends since there is no time to visit do to work. Bringing the world logistics center gives me hope I'll get to live in the city I grew up in

Sincerely,

Michael Lipton

[REDACTED]

riverside, ca 92503



CITY COUNCIL
MÓRENO VALLEY
RECEIVED

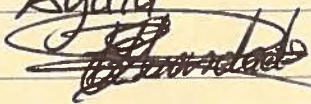
6-1-15

15 JUL -6 PM 5: 20

To

City Council of Moreno Valley c/o
City clerks office.
14177 Frederick St.
Moreno Valley CA. 92553

Queridos miembros del consilio.
yo Reina E. Ayala /
Les pido de favor, que apollen
Este proyecto. World Logistics Center.
ya que necesitamos, esa fuente
de empleo, para no tener que viajar
a otras ciudades lejanas y a la vez
nos beneficiara con nuevos programa (para) en
las escuelas para nuestros hijos
Gracias por su apoyo

Reina E Ayala



Moreno Valley CA. 92553.

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 23, 2015

15 JUL -6 PM 5: 20

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, California 92553

Dear Councilmembers

My name is Hilda Garcia and I have 14 years living in Moreno Valley. My job is in a warehouse here in Moreno Valley but I know of many families that go out for work far away everyday. I believe The World Logistic Center would help many people here in the community to have jobs in the city and not travel elsewhere. I hope you approve (embrace) the project so it happens here in Moreno Valley.

Sincerely

Hilda Garcia

[REDACTED]
92551

[REDACTED] moreno valley Calif.

mi nombre es Hilda Garcia tengo 14 años viviendo en moreno valley mi trabajo es en una fabrica pero es aqui en moreno valley. pero tengo familiares que salen a trabajar lejos todos los dias. yo pienso que el proyecto de world logistics center ayudaria a muchas personas de aqui de nuestra comunidad para tener mas empleos y no salir todos los dias a otros lugares. pues ojala aceptaran que se hiciera aqui en moreno valley

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PH 4: 55

June 19, 2015

City Council of Moreno Valley
90 city Hall/ Clerk's Office
14777 Frederick Street
Moreno Valley, CA 92553

Dear city councilmembers,

I am writing this letter to express my support to the World Logistic Center project, I truly believe that this project it will unified many families by providing them with local jobs, that way they don't have to commute everyday and spend hours in traffic very tired after work. I am very blessed to have my three sons working locally in this city, but my neighbor was not, his son was commuting six day from Moreno Valley to Anaheim, he used to wake up really early to leave before traffic and one night on his way back home to Moreno Valley he was very tired and felt asleep, he got into a car accident and lost his life. This was devastating for his family and I wish this doesn't happen to another family, thats why we need local jobs.

Sincerely,

Maria Cerqueira

MV CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 55

June 19, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14777. Frederick Street.

Moreno Valley, CA 92553

Dear city councilmembers,

I am writing this letter to express my support to the World Logistic Center project because I think this will bring more jobs to our city. I have been living for 17 years in Moreno Valley, I have 5 sons and they had to move to Los Angeles area because lack of jobs in Moreno Valley, so I stayed in Moreno Valley with just one of my daughter. My first job I got it was at Corona, and since I don't drive I had to get buses to get to my job, I did it during nine years. I had struggled to find a job in Moreno Valley, I think we need more opportunities to get a better life. We deserve better!

Sincerely, *Natividad*
Natividad Sandoval

MORENO VALLEY, CA

MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

5-27-15

City of Morenovalley Council
40 City Hall / Clerks office
14127 Frederick St.
Moreno Valley California 92553

Estimados miembros del Consejo :

Mi nombre es Manuel Rodriguez toda mi vida estuve buscando trabajos aquí en Moreno Valley no encuentro trabajos estamos aquí por veinte años y no encontramos nada. Sería bueno que se abrieran oportunidades de trabajos y que viviéramos mejor. Yo apoyo el proyecto World Logistic Center para q' vengan los trabajos - Ayuden para que sea así

Gracias

Manuel Rodriguez

[REDACTED]
MORENO VALLEY. CAL. 92553
[REDACTED]

June 19, 2015

City Council of Moreno Valley
90 City Hall/Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 58

Dear City councilmembers;

I support the World Logistic Center project because it will bring more jobs to our community. My first job I got it was at Temecula and for me it was a long drive from Moreno Valley to Temecula.

I think we deserve more opportunities.

It is a very important matter to me to find a job a be able to help my mom since she is a single mom who struggle to find a job close home. Also I need a job to be able to finance my school. I am 29 ~~min~~ and also struggle to find jobs, that's why I support this project. I have a mental disorder but I think we still need to be able to find jobs and be useful to our community.

Maribel Sandoval

Moreno Valley ca
92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:59

May 28, 2015

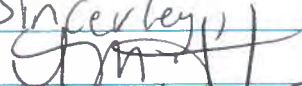
City Council of Moreno Valley
C/O City Hall/Clerk's office
14177 Frederick St.
Moreno Valley Ca 92553

Dear Councilmembers:

Hello my name is Alga Myland and I have been a resident of Moreno Valley for over 12 years. I have seen the ups and the downs of my city, but I know it can get better. With the World Logistics Center I believe Moreno Valley will rise to the top. There are benefits to the city and to the individual families.

Please take the residents well being into consideration when discussing the approval of this project. Again this World Logistics Center will create tax revenue to help benefit Moreno Valley and the citizens/residents.

Sincerely,


Moreno Valley Resident


Moreno Valley Ca 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

June 4, 2015

15 JUL - 7 PM 4: 42
City Council of Moreno Valley
% City Hall/Clerk Office
14177 Frederick St.
Moreno Valley CA. 92553

Hello,

My name is Jessica and I have been in Moreno Valley since 2005. I have 3 children and work here as well. I support the World Logistics Center because I believe it would bring work and income to much needed families. This community is short on jobs and is bringing families to poverty or to commute hours to put food on the table. I believe this is a great opportunity for our community. Thank you!

Jessica Blakeborough

[REDACTED]

Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

05/27/15


15 JUL -7 PM 4: 52

city council of Moreno Valley
%o city Hall / clerk's office
14177 Frederic street
Moreno Valley California 92553

Dear Mayor and Councilman Jesse Molina

my name is Maria Dascano I been in Moreno Valley for 12 yrs - I have 2 sons - 22 and 17 years old I want you to take in consideration the World Logistic project. This project will open new door for my family, and it will bring tax revenue to our city. You were elected by the people ^{and} I demand you to do your Job as a leader that you are do not tell us to do your Job. The EIR is a job for the 5 of you - Do it, we deserve it - Moreno Valley deserve to be a great city do not Rob us this opportunity.

Sincerely
Maria Dascano
[Signature]


Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 58

May 28, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick St.
Moreno Valley, Ca 92553

Dear Council members:

As a resident of Moreno Valley for over 10 years, I have seen the city change for the worst. I love my city and I hate to see it fall apart economically. For this reason, that is why I am a supporter of the World Logistics Center.

This project will benefit Moreno Valley in numerous ways. Please new council, think of the residents and making our lives easier with less committins. Thank you for your considerations but please follow through. We need this!

Sincerely,

Kaulana Wark
Moreno Valley Resident

Moreno valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

May 27, 2015

City Council of Moreno Valley
City Hall / Clerk's office
14177 Frederick St.
Moreno Valley Ca 92553

Dear Councilmembers:

I want the World Logistics Center to be built in Moreno Valley, and provide better opportunities for the City. I have always supported this project due to all the benefits that this will bring. Please allow the development to happen now. This has taken years, and it's showing that the city does not care about the residents. The Councilmembers that were in office before were corrupt, please new members of the council think about the struggling residents.

This project is very important to me and my family. Not only does it benefit me and my household income, but it benefits the city and the city's economy. Let this development of the World Logistics Center happen. Now please.

Sincerely,

Ashley Thomas
Moreno Valley CA 92553

Moreno Valley CA

CITY COUNCIL
MORENO VALLEY
RECEIVED

6-3-15

15 JUL -7 PM 5:03

city council of moreno valley
c/o city clerk's office
14177 Frederick st.
moreno valley ca. 92553

Dear Councilmembers:

Por medio de esta carta quiero notificar que para mi es muy necesario este proyecto de world logisticscenter que se pueda hacer realidad.

ya que yo Lissette Garcia como residente de Moreno valley es muy importante para mi tener un trabajo que este cerca de mi casa donde esta ubicada, y asi no tener que ir tan lejos o aveces tener que estar muchas horas manejando por el fwy, esas horas perdidas yo las puedo ocupar para ayudar y poder estar mas tiempo con mis hijos y poder ayudarles con sus necesidades a ellos tambien?

Sincerely,

E. Lissette Garcia y

Moreno valley ca. 92551

June 6, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5:03

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, California 92553

I have lived in Moreno Valley for 15 years. Right now, I have no kids living in my present home. Presently my occupation is clerical for the last 29 years in Los Angeles County. I am active in my community going to church and I work on a league during the week.

My commute is 86 miles round trip every day 5 days a week. When I get home, I am tired, lack of energy, do not feel like doing anything at all. I have little time with my family. The time I get home I must prepare myself for work the next day.

The World Logistics Center project is going to be great for our city. We need jobs in our city. This project would benefit as far as

jobs, benefit us ^{as} far as taxes. We need jobs in our city and cannot stress this enough. I support World Logistics Center project.

Sincerely,

Thurman Jackson II
Clara M Jackson

[REDACTED]
Monro Valley CA 92553

15 JUL -7 PM 4: 53

June 6, 2015

City Council of Moreno Valley
to City Hall / Clerk's office
Moreno Valley, California 92553

Querido Council miembro:

Podria aceptar el proyecto de World Logistics Center. Tengo 2 hijos que no encuentran trabajos y ellos estan en la escuela de noche. Es muy importante que nuestra juventud tenga trabajos para superarse.

Favor de aprobar el proyecto World Logistics Center.

gracias
Carmen Delgado (Carmen Delgado)

Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-25-2015

15 JUL -7 PM 4: 53

City Council of Moreno Valley
c/o City Hall/Clerk's Office
14177 Frederick St.
Moreno Valley CA. 92553

Dear Council member

Mi razón para esta carta es pedir que ustedes como miembros del Consejo de Moreno Valley hagan todo lo posible para este proyecto. Le World Logistics Center sea aprobado aquí en Moreno Valley.

Mi nombre es Bertha Garcia y tengo 6 hijos 2 de ellos están en H.S. y mi hija adicional en el colegio. No quisiera que por falta de trabajo mis hijos se muevan lejos, somos una familia muy unida y amamos mucho esta ciudad de M.V. por favor ayudarnos a no tener que irnos. Muchas gracias por su atención.

Bertha Garcia
BERTHA GARCIA

[REDACTED]
Moreno Valley CA. 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

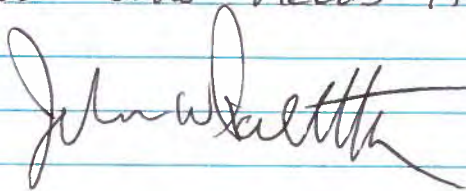
15 JUL -7 PM 4: 54

June 9th, 2015

City council of Moreno Valley
 90 city Hall / Clerk's Office
 14177 Frederick street.
 Moreno Valley, CA. 92557

Dear City council members:

My name is John Paletta, I am a retired RN nurse, I feel that it would be good to create new job in Moreno valley so ~~we~~ we can keep our children out of the street and getting in trouble. That's how I feel it ~~would~~ would better our community. Put the taxes where they belong, not where they don't need it, don't let it go to the people they don't need it, put it to the good who needs it.



 Moreno Valley CA

92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 54

June 19, 2015

City Council of Moreno Valley
40 city Hall/Clerk's office
14177 Frederick Street,
Moreno Valley, CA 92553

Dear councilmember;

My name is Jesus Cervantes, I have been a Moreno valley resident for 23 years, I moved to this city in 1992 from Norwalk because his job moved to Miraloma, so he bought a house. He and his brother in law were working in this company driving everyday from Norwalk to Miraloma, his brother in law only commuted for a year and decide to quit his job and not commute no more. They decide to move to Moreno Valley because they have relatives living in this city that they move after couple years commuting to Anaheim.

Jesus Cervantes A

Moreno Valley ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:50

JUNE 5, 2015

City Council of Moreno Valley
c/o City Hall/Clerks office
4177 Frederick Street
Moreno Valley, California 92553

Dear Councilmembers: you should approve this project because it will bring jobs to the city and if we work you benefit too. Money made in Moreno Valley equals money spent in Moreno Valley.

We as residents need good paying jobs. The logistic center will supply that and more. So please approve the project.

Sincerely,
Theodoro Alfaro
Moreno Valley resident

[REDACTED]
Moreno Valley, CA 92553

June 6th, 2015CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:50

City Council of Moreno Valley
 c/o city hall / clerk's office
 14177 Federico Street
 Moreno Valley, California 92533

I am writing to you today to ask that you work to make sure the logistics center gets approval here in Moreno Valley. I know that Moreno Valley needs to boost. To spark that boost we need business and we need jobs. This project will bring ton of jobs to the area for all ~~spots~~ sorts of people. This logistics center will help generate more millions in fees & giving the city more flexibility to fix the problems in the community. Please for the world logistics center and to build the perments so we can build and help people get jobs. Please give permission for the world logistics center for the city
 Karina Avila

Moreno Valley CA 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

26 May '15

15 JUL -7 PM 4: 51

City Council of Moreno Valley
C/O City Hall Clerks Office
14177 Frederick
Moreno Valley, CA. 92553

I, Jose R. Garcia, as a citizen who was raised in the city of Moreno Valley for about twenty years, am here to support the World Logistic Center. As a full time student and a part time worker, I am here to support the World Logistic Center for the reason that we as a community need to take action and have better resources for us and the city. Because the lack of limited job's in the city, I have to commute to another city to work and also attend school. So I am here to give my full support and asking to make changes to our city.

Sincerely,

Jose R. Garcia
[REDACTED]Moreno Valley, CA
92553
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:52

June 19, 2015

City Planning Commission
% City Hall/Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Planning Commission

I am writing this letter to express my support to the World Logistic Center project because I think this will bring more jobs to our city. I have been living in Moreno Valley for 17 years, all my sons left this city because they couldn't find jobs in Moreno Valley, I couldn't either my only job I had it was in Corona and since I don't drive I had to take the buses to my job for 9 years earning the minimum wage. We need more opportunities in this city. We deserve it!!

Sincerely,

Ruben del MA

MARTIN DEL SANDOVAL

MORENO VALLEY

June 19, 2015

City's Planning Commission.
 c/o City Hall / Clerk's Office.
 14177 Frederick Street
 Moreno Valley, CA 92553

CITY COUNCIL
 MORENO VALLEY
 RECEIVED

15 JUL -7 PM 4:49

Planning Commission

I am writing this letter to express my support to the World Logistic Center project, I truly believe that it will unified many families by providing them with local jobs, that way they don't have to commute everyday and spend hours in traffic very tired after work. I am very blessed to have my three sons working locally in this city, but my neighbor was not, his son was commuting every single day to Anaheim, waking up really early to leave before traffic and on his way back home to Moreno Valley fell asleep, got into a car accident and lost his life, that was devastating for us and his family.

I wish this won't happen again to another family, that's why we need more local jobs.

Sincerely,

Marisa Cervantes

MV CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 49

June 19, 2015
Planning Commission
%o City Hall/Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Planning Commission,
I support the World Logistic Center project because it will bring more jobs to our community. I have struggled a lot to find jobs in this city. My first job I got it was at Temecula and it was a long drive from Moreno Valley. I truly believe we deserve more opportunities to find local jobs and stop commuting to other cities. I really wish you consider our needs in Moreno Valley and approve this project that it will benefit our people and ~~to~~ community on all aspects. Thank for your time.

Sincerely
Maribel Sandoval

Moreno Valley ca
92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 AM 4:48

June 6th 2015

City Council of Moreno Valley
 c/o City hall / clerk's office
 14177 Frederick Street
 Moreno Valley, CA. 92553

Ase 8 años vivienda en la comunidad. Tengo tres hijos mi ocupacion soy plomero y contruccion, tengo a mis hijos en Futbol en la escuela Brasil y vamos a parques y a la Iglesia

Los 8 años e manegado fuera para trabajar, afecta mucho en mi vida no tengo tiempo para mi familia y estoy muy cansado de manegar. mi esposa no trabaja para estar con mis hijos ya que yo no puedo el proyecto me daría oportunidad de tener mas tiempo de calidad con mi familia y ayudura a la economia.

Jose Juan Orozco
 [REDACTED]
 Perris CA 92570

JUNE 4-2015

to the city council
yo Margarita Zavala

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 47

estoy solisitando a ustedes que permitan la
aprobacion del world logistic center
porque neesitamos trabajos y dinero para
las escuelas

Margarita Zavala - [REDACTED]

[REDACTED] moreno valley C.A

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:46

To Jeffrey J. Giba,

I have been a dentist
for 25 years. I have seen
the economy of Moreno Valley
go down hill, which has
severly affected my business.

I completely support the World
Logistic Center project.

[Redacted]
MV, CA 92557

Don Schuboter

Don Schuboter

CITY COUNCIL
MORENO VALLEY
RECEIVEDJune 6th 2015

15 JUL -7 PM 4:42

City Council of Moreno Valley
c/o city hall/Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

I live in Moreno Valley my whole life. I have 4 brothers. I am an 9th grader. I'm active in my church, NA. I want to finish my school here and stay here. I love my city and I don't want to move. That's why I support The world Logistics center because its going to bring lots of jobs to the city of Moreno Valley. Please Support this Project. Thank you

Sincerely,
Marilyn Molina /

Moreno Valley CA
92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL 17 PM 4:42
 Señor City Council of Moreno Valley
 I Agustín Vargas have lived in Moreno Valley
 for the last Eighteen years.
 I would like to see some changes
 in my community such as jobs and
 progress.

me and my wife Delfina have three
 children.

I'm a material handler and drive all
 the way to Colton CA, to my job.
 I would love to have a job here in Moreno,
 because I'm not getting any younger.
 It would be nice that my children
 would be able to work here in Moreno
 Valley a local job.

I myself have driven back and forth to
 Colton CA, I would imagine the time
 I would have saved and gas money
 that got away from my family food
 table.

The world Logistics Center Project
 would be a blessing for our community
 thank you.

Señor Council
 from my family
 to your heart,

Agustín Vargas

Moreno Valley CA,
 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

June 3 - 2015

15 JUL -6 PM 5: 17

City council of moreno valley
 c/o city clerk's office
 14177 Frederick st.
 Moreno valley CA. 92553

Queridos miembros del concilio de
 moreno valley mi nombre es Fany y
 tengo 18 años viviendo aquí en esta
 ciudad pero hemos tenido muchos
 problemas porque mi esposo trabaja
 fuera de la ciudad y no tiene tiempo
 de estar con la familia por eso les pido
 que hagan todo lo posible para que
 este proyecto de World Logistics Center
 sea aprobado, gracias por su
 atención

Fany Mederas

[REDACTED]
 moreno valley CA. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:19

JUNE 4 - 2015

city council of Moreno Valley
c/o city Hall/ clerk office
14177 Frederick St.
Moreno Valley CA. 92553

Mi nombre es Marina y les escribo
esta carta para pedirles que ustedes como
miembros del Consejo de Moreno Valley
agan todo lo posible para que este
Proyecto de World Logistics Center sea
aprobado, yo como madre de 6 hijos
apoyo este proyecto porque NO quiero
que ninguno de mis hijos se tengan
que ir lejos a buscar trabajo, somos
una familia muy unida y amamos mucho
esta ciudad y queremos verla progresar
gracias por su atencion

Marina Galicia

Marina Galicia =

[REDACTED]
[REDACTED]
Moreno Valley CA. 92551

JUNE 18-2015

Victor Gonzalez

to - city of MORENO valley council members
Yo Victor Gonzalez estoy escribiendolos
Para solicitarlos que permitan el permiso
de la constuccion de world Logistic
Center

Porque necesitamos trabajos
en moreno VALLEY CA, y mas programas en
las escuelas

[REDACTED]

MORENO VALLEY CA
Victor Gonzalez

CITY COUNCIL
MORENO VALLEY
RECEIVED
25 JUN - 6 PM 5: 10

TO: GEORGE PRICE - DISTRICT 3
 6/4/15 MORENO VALLEY, CA
 CITY COUNCIL
 MORENO VALLEY
 RECEIVED

A LITTLE ABOUT MY FAMILY

MY NAME IS LEO TAFOTA MY WIFE'S NAME IS BARBARA TAFOTA MY BIRTHDATE IS 15 JULY 1946

IS BARBARA TAFOTA, WE ARE BOTH RESIDENTS SINCE 1988. WE HAVE 2 DAUGHTERS AGED 38 AND 34. THEY BOTH GRADUATED FROM VALLEY VIEW H.S. THEY ARE BOTH MARRIED NOW AND MY OLDEST DAUGHTER LIVES HERE IN M.V. AND HAS 3 CHILDREN. THE OLDEST IS 8 YRS OLD AND ATTENDS ^{SUNSET} IN 3RD GRADE. MY DAUGHTER WORKS AS A TEACHER'S AIDE WITH THE ^{SPECIAL NEEDS} MIVNSD, 1 YR NOW. MY WIFE ALSO WORKS FOR THE MIVNSD IN FOOD SERVICE. ^{SHE} WILL RETIRE NEXT YEAR AFTER 26 YEARS. I AM RETIRED, DISABLED FROM THE ^{MTD} ^{WATKINS} ^{SEAL}

OUR CITY LIKE MANY OTHERS IS IN DESPERATE NEED OF REVENUE TO BE ABLE TO FUND OUR NEED FOR NECESSARY SERVICES LIKE LAW ENFORCEMENT, ^{PUBLIC SAFETY} MORE OFFICERS, FIRE PROTECTION MORE FIREFIGHTERS AND STATIONS, MORE AFTER SCHOOL PROGRAMS VOCATIONAL TRAINING, HEALTH CARE, ROAD REPAIRS AND MANY OTHER NEEDED CITY SERVICES THAT NEED MORE CITY TAX DOLLARS TO FUND. BEFORE THE RECESSION THESE SERVICES WERE FUNDED WITH LICENSE, BUILDING FEES FROM MANY DEVELOPMENTS, ^{MOSTLY} HOUSING. WE HAVE GROWN TO BE THE 2ND LARGEST CITY IN RIVERSIDE COUNTY. WE NEED MORE ^{REVENUE} ~~SERVICES~~ JUST TO MAINTAIN THE LEVEL OF SERVICES THAT WE HAD YEARS AGO.

WE CAN ACHIEVE THESE GOALS WITHOUT TAXING
 THE CITIZENS MORE BY RECRUITING, PROMOTING A
 BUSINESS FRIENDLY ENVIRONMENT, ACTIVELY SEEKING
 BUSINESSES TO MOVE TO OUR CITY BY WHATEVER MEANS
 AVAILABLE TO THE CITY, SUCH AS DISCOUNTS IN TAXES, UTILITIES
 INFRASTRUCTURE. WE SUPPORT THE PROPOSED "WLC"
 DEVELOPMENT, AS WELL AS THE SO CALLED "MERICAL
 CORRIDOR" IN THE CENTER OF THE CITY, THESE THINGS
 TAKE TIME FROM CONCEPTION TO ACTUALLY BUILDING
 AND WE NEED TO SHOW THAT TIME PROVES AS
 MUCH AS POSSIBLE AND STOP POINTING FINGERS AND DO
 WHAT IS BEST FOR THE CITIZENS OF M.V. MOVE NOW!
 THE LARGEST PENDING PROJECT, WLC, HAS BEEN DELAYED
 BY DIFFERENT, ^{INDIVIDUALS} CITY ACTIVIST WHO OFFER NO ^{POSITIVE} IDEAS, OR SUPPORT
 FOR THE CITY'S GOOD. LOGISTICS IS THE LARGEST GROWING
 INDUSTRY IN SOUTHERN CALIFORNIA AND SOMEONE IS GOING TO
~~PLEASE~~ ATTRACT THOSE COMPANIES TO THEIR CITY'S AND WE
 HAVE THE LOCATION, THE NEED, AM A LONG TIME RESIDENT, DEV
 WILLING TO PUT HIS MONEY WHERE HIS MOUTH IS, A PAST RECORD OF
 ENVIRONMENTAL RESPONSIBILITY, SKETCHES, A LEED CERT. NATIONAL
 WE MUST TAKE ADVANTAGE OF THIS OPPORTUNITY FOR THE FUTURE
 OF OUR CHILDREN, ^{OUR} GRANDCHILDREN, OUR CITY. WE CAN BE THE
 LEADER, ~~NOT AN ATTEMPT~~ ~~DISTANT FOLLOWER~~
 IN THIS INDUSTRY. OR MISS THE BOAT AND END UP
 IN DEBT.

LET'S NOT WASTE THIS GOLDEN OPPORTUNITY

TO MOVE OUR CITY AHEAD, TO BE THE ENVY FOR
"WHERE DREAMS SOAR."

SO CAL ~~PEOPLE~~ ~~ARE~~ ~~JUST~~ ~~OTHER~~ ~~WHERE~~
"STARTING HIGH" ~~AMONG THE REST.~~

LEO TAFORA *Leo Tafora*
- 28 YEARS

MORENO VALLEY, 92555

MORENO VALLEY'S TIME IS NOW!

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:41

May 22, 2015

City Council of Moreno Valley
Clerk's Office
14777 Frederick Street.
Moreno Valley, CA 92553

Dear Councilmembers;

I would like this project, to make more jobs in this city and, for people wont be going to other city's. People ~~wont~~ would be closer to go to work, for them wouldn't be a lot of traffic. This would help the city of Moreno valley, for people wouldn't be in a rush, in the traffic, and they wouldn't ~~crash~~ in ~~the~~ ~~rush~~ the freeway just to be in a rush. This is the ~~way~~ reason why people wouldn't be in a rush.

Sincerely, Sarai Duenas
Moreno Valley, California

[Redacted Address]

Moreno valley, 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 19

to. city council of Moreno valley
c/o city Hall/ clerk office
14177 Fredrick st.
moreno valley calif. 92553

I, Christina Villarreal
I would like to support
World logistic Center, bringing
jobs for that community
and support for disabled
Persons like me, like jobs
and money from Tax revenues.

Sincerely

Christina Villarreal,

[Redacted]
Moreno Valley Ca 92551
[Redacted]

Christina
Villarreal

June 6 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:19

City Council of Moreno Valley
 c/o City Hall / clerks office
 1477 Frederick Street
 Moreno Valle California 92553

Estimados consejales yo e vivido desde el año 1994 en moreno valle y en el transcurso del tiempo e mirado que la ciudad de moreno valley nesesito mas trabajos y por eso apruebo este proyecto para que haya mas oportunidades de trabajo y para que nuestros hijos tengan un mejor futuro no es por mi sino por el futuro de esta ciudad tener que mirar asi adelante por el bien de la ciudad aprueben este negocio por el bien de todos y como puede ser apollando el proyecto de word logistics center que es un buen proyecto para la comunidad

Jose Avila

[REDACTED]
 moreno valley Co. 92555
 [REDACTED]

June 6, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:19

City Council of Moreno Valley
C/O city hall / Clerk's office
14177 Fredrick Street,
Moreno Valley, California

I've been living in Moreno Valley for 19 years. Please approved of a building of the World logistics Center for the future. Please give permission for the world logistics center for the ~~user~~ city. If we keep building houses without creating more jobs in the city we can have more population. Spending hours every day trying get to work is no way to spend a life.

Antonio Avila

[Redacted]

Moreno Valley, Ca
92555

[Redacted]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 17


June 9, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I don't like Moreno Valley, we
have no jobs. My parents have to
commute just to work. The city
is garbage.

Sincerely,


Naiman Manning
Moreno Valley Resident


Moreno Valley CA 92553

Moreno Valley, CA.
92555

City Council of Moreno Valley
c/o City Hall/ clerk's office
14177 Frederick St.
Moreno Valley CA. 92553

15 JUN -6 PM 5: 18

CITY COUNCIL
MORENO VALLEY
RECEIVED

Dear Council members,

I am writing to you today to ask that you work to make sure the World Logistics Center gets approval here in Moreno Valley. We enjoy living in Moreno Valley, we have been living here for 11 years. We want the best for the community and our family.

I support the World Logistics Center because it's a great opportunity to have a job where I can work locally, close to home and spend more time with my family. I want to believe that you have this area's best interests in mind, so I ask for your support of this logistics project. The World Logistic Center provides Moreno Valley with the opportunity to make huge and very needed changes to the city, making it a better place to live and work.

Sincerely,

Amadeo Medina
Amadeo Medina

Cecilia Serrano

May 23 -2015

San Diego, CA 92108

City Council of Moreno Valley
 c/o City Hall/Clerk's Office
 14177 Frederick Street,
 Moreno Valley, California 92553.

15 JUL -6 PM 5: 18
 CITY COUNCIL
 MORENO VALLEY
 RECEIVED

Dear Council Members;

My name is Cecilia Serrano

I currently live in San Diego ca but I was a resident of. Moreno Valley for 15 years before that. My Husband and I both commuted for years out-side the city because there wasn't Any Job opportunity we Have two daughters that currently live in Moreno Valley AND we would like a different future for them, I Hope we can see that in the near future. Our family Supports the World Logistics Cente project. because it will create a lot of. opportunity for people in Moreno Valley. Hopefully putting the City on the map. like San Diego a beautiful city that has tons of Job opportunity and businesses that are thriving and a City with a economic base we Hope you make the right choice for the city of. Moreno Valley Thank you.

Cecilia Serrano
 Cecilia Serrano

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 18

June 4, 2015


City Council of Moreno Valley
CPO City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

~~Moreno valley~~

I hate Moreno valley.
There are NO jobs.
There needs to be
more improvements.

Sincerely,


Solice R.
Moreno Valley Resident
[Redacted]
Moreno Valley CA 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 18

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Junio 11, 2015

YO, Consuelo escribo esta carta para expresar mi apoyo al World Logistic Center, porque traería mas trabajo a la juventud, este proyecto traería beneficios a toda la comunidad. Cuando hay trabajo la gente tiene dinero y todos nos beneficiamos. de una manera o de otra. En Moreno Valley existen muy pocos trabajos para la gente que vive aquí por eso tienen que manejar todos los días a otras ciudades dejando a sus familias por muchas horas. Ojala y se decidan a aprobarlo en beneficio de Moreno valley

Sincerely.

Consuelo Cartaneda

[REDACTED]
Moreno valley, CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED



15 JUL -6 PM 5: 18

June 15, 2015

City Council of Moreno Valley
City Clerk's Office
1477 Treadwell St.
Moreno Valley CA 92553

Dear Council members:

Hello, I'm a resident of Moreno Valley and I want the World Logistics Center. We need more income as a city to help repair our damaged city. We need the World Logistics Center to better us as a city.

Sincerely,

Ana Navarrete
Moreno Valley Resident

Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

City Council of Moreno Valley

I have lived in Moreno Valley for 13 years.

I have no children, I'm in High School

and I'm in the swim team and I'm starting
the water polo team this year. My dad worksfor ten years going to Torrance and he had
to go from Moreno Valley to Torrance. Due to
this city there is no work, that's why Iapprove this world logistics project so there
more work jobs in Moreno Valley and the
families can stay more united to each other.In the future I wish to have more jobs
for the teenagers. If there are more jobs
there will be more taxes and more schools
and it will better the education. I hope
you ~~consider~~ take in count my letter.

Sincerely,

Marcela Quintero

Moreno Valley resident

[REDACTED]
Moreno Valley, CA 92553

City Council of Moreno Valley
 To City Hall, Clerk's Office
 14177 Frederick Street
 Moreno Valley, California 92553

CITY COUNCIL
 MORENO VALLEY
 RECEIVED

15 JUL -6 PM 5:18

Dear Council members:

I moved to Moreno Valley
 in 1987. I had three sons, and
 they could not find a job here!

One son left - soon after the other
 two left also. They said "notter there
 as no work here!" They all got married
 and now there is still no work for my
 grand children here, so now they left
 also.

This wonderful World Logistics Center
 will be good for all the High School
 kids that will be looking for jobs
 & for their future.

I don't know why you don't pass
 it's very important for the future.

Sincerely,

Charlotte Ghizail Espinoza

Moreno Valley, California
 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:18

JUNE 18-2015

to

City Council of Moreno Valley
% City Hall / Clerk's Office
14177 Frederick ST.
Moreno Valley Ca 92553

A mi me parece muy bien este proyecto, porque es un beneficio para esta ciudad. Yo trabaje en Los Angeles, y paso 4 hrs en el Fwy, y así como yo hay mucha gente, y con este proyecto, todo cambiaría, y así tendríamos más tiempo para pasar en familia, y tendríamos un poco más de dinero, porque no gastaríamos tanto en gasolina y ya no tendríamos que madrugar así podíamos dormir un poco más. Yo estoy completamente de acuerdo en este proyecto.

Angel Rojas

Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:17

City Council of Moreno Valley
City Hall / Clerk's office
1477 Fredck Street,
Moreno Valley, CA 92553

Dear Council-Members,

It's a pleasure to write to you. I live in Riverside and I'm 13 yrs old I heard the 3 billion dollars that is going to go to the project World Logistics Center. That money my city would take it for a project Moreno Valley is lucky to have this oppurtunatiy don't miss it.

I like the project because it's for the next generation. It's high technology and it's going to bring alot of thousands of dollars for tax revenue for our state of California and for the city of Moreno Valley. f Be kind and Helpful and approve this wonderful project

Sincerely,

Miroslava Quiroz

[REDACTED] Riverside, CA 92507

Miroslava Quiroz Quiroz

6-4-15

City Council of Moreno Valley
 City Hall/ Clerk's office
 14177 Frederick Street.
 Moreno Valley Calif. 92553

CITY COUNCIL
 MORENO VALLEY
 RECEIVED
 15 JUL -6 PM 5: 17

Dear Councilmembers: I support world logistics because of Future Jobs it will create, Growth is necessary for progress but we also need to be responsible. So world logistics will comply with clean diesel exhaust standards, Therefore I think its good for the city, and the people. I live and like the city of Moreno valley

Thank you

Ben Gomez

Ben Gomez

Moreno valley Calif.

92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:17

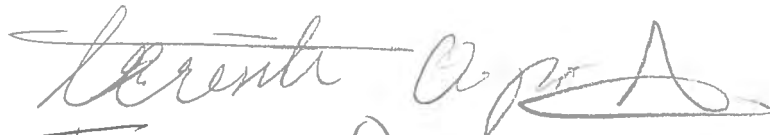
June 4, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I think that Moreno valley will or
can be fixed with more jobs. (Well
paying jobs.) jobs that you can live
life comfortably with your incomming
income.

Sincerely,



Teresita Orozco
Moreno Valley Resident

Moreno Valley CA 92553

Teresita O.

Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PH 5: 17

June 4, 2015

City Council of Moreno Valley
C/O City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I want more jobs. The reason
I say that is because a lot of
people struggled to find a job and
moved just to find a
job. Get more homeless shelter
because I see a lot of
homeless people. Improve schools.

Sincerely, Agyei Spencer
Agyei Spencer
Moreno Valley Resident
[REDACTED]
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -6 PM 5:17

June 4, 2015


City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

More Jobs and more sports fields to
keep teens out of streets. We need the Logistics
Center. I want to go to college and study logistics
to get ahead in life.

Sincerely, ~~Jeno Piora~~ Jeno Piora

Moreno Valley Resident


Moreno Valley CA 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:17

June 4, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I feel that Moreno Valley can be helped by making more jobs and help other get jobs, not just the ones who been there but also, the teenagers. If they help teenage get job it may decrease the crime rate. Also, teenagers will have the want to work. Everyone has to remember that the teenagers are the future and we have to start from the bottom to get anywhere.

Sincerely, Shiki page

Moreno Valley Resident in

[REDACTED]
Moreno Valley CA 92553

6-4-15

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:17

City Council of Moreno Valley
 40 City Hall / Clerk's office
 14177 Frederick St.
 Moreno Valley, CA 92553

Señores del Consilio

Estoy de acuerdo que se haga el proyecto para que haya trabajos. El proyecto es muy bueno va a beneficiar a muchas personas porque veo q' muchos salen afuera de la ciudad para trabajar. El proyecto no traera mucha contaminacion. A pruebento para el beneficio de la ciudad de Moreno Valley

Gracias

Artemio Cortez - Artemio Cortez

[REDACTED] Moreno Valley

CA 92551

[REDACTED]

Kevin China

Moreno Valley, CA 92551

May 16, 2015.

City Council of Moreno Valley
 c/o City Hall / Clerk's office
 14177 Frederick Street,
 Moreno Valley, California 92553

15 JUL - 6 PM 5: 15
 CITY COUNCIL
 MORENO VALLEY
 RECEIVED

Dear councilmembers,

I am writing to you today to ask that you work to make sure the World Logistics Center gets approval here in Moreno Valley. I support this project because I believe that ~~the project~~ the entire community will benefit in one way or another from the project. For one thing, this project will bring a ton of jobs to the area for all sorts of people. For another, this logistics center will help generate more millions in fees, giving the city more flexibility to fix the problems in the community.

I have ~~been~~ been living in Moreno Valley ^{for nine months} with my host parents as an exchange student from China. I wish that the city is going to develop at the ^{fast} speed like China. I love the city and enjoy the life in the city. I wish the city will be much more beautiful ^{in future} than today. therefore, if the project set forth benefit the residences in the city, definitely, we must back this ~~project~~ proposal and approve it.

Sincerely,

Kevin (China)

Moreno Valley, CA (92551)

May 16 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 15

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Council members,

It is a pleasure to be able to communicate this letter to you in regards to the World Logistics Center. We have overall seen the benefit of its project. All citizens in one way or another will benefit from it, such as schools, workers, college graduates, the safety of the city such as police, firefighters, etc. This involves STEM which is being taught at schools for the future to come. Overall, this project will benefit in growth, not only economically, but in success.

Sincerely, Eustacia Arriaga

[REDACTED]
92551

Moreno Valley CA,



x Eustacia Arriaga

Moreno Valley, CA.
92555

Packet Pg. 797

A.1.z

City Council of Moreno Valley
c/o City Hall/ clerk's office
14177 Frederick St.
Moreno Valley CA. 92553

15 JUL -6 PM 5: 15

CITY COUNCIL
MORENO VALLEY
RECEIVED

Dear council members,
I am writing to you today to ask that you work to make sure the World Logistics Center gets approval here in Moreno Valley. I support this project because I would really want my parents to have jobs near the home to spend more time with us. We enjoy living in Moreno Valley and want the best for our city.

Sincerely,

Luz-Yesenia Medina
Luz-Yesenia Medina

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:16

MAYO 16-15

CITY COUNCIL OF MORENO VALLE
 1/6 CITY HALL/CLERK'S OFFICE
 14177 FREDERICK STREET
 MORENO VALLE, CA 92553

DEAR COUNCIL MEMBERS:

Sr Consul de Moreno Valley, estamos escribiendo para que Ud. nos ayude a que se acepte este proyecto, el cual habra trabajado mas cerca para nuestra comunidad.

Somos una familia apoyando el proyecto, tenemos vivienda aqui por 25 años y es lo mejor que hemos visto en todos estos años. Yo maneje por 10 años lejos ahora estoy retirado, por nuestra nueva generacion es la que va a gozar todo lo nuevo proyectos en los cuales estamos, queriendo que se apruebe, Dios es tan grande que nos va ayudar esperamos que Ud nos ayude para que al final todo lo que la comunidad de Moreno esperamos que se conceda. Gracias por su apoyo

Roberto Diaz

moreno Valley Ca
 92555

May 30, 2015

City Council of Moreno Valley
c/o City Hall / clerks office
14177 Fedrick Street
Moreno Valley, Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 16

Dear Council Members

I really hope we can bring more jobs and buildings in Moreno Valley so there are jobs closer to our homes. Closer to our families so we don't have to stress on so much gas money. We need World Logistic Center
Daniel Vaca 21 years old
Food Cook - Riverside

Sincerely

Daniel Vaca

Moreno Valley Ca 92553

[REDACTED]

[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:16

May 29, 2015

City Council of Moreno Valley
 c/o City Hall / Clerk's Office
 #4177 Frederick St.
 Moreno Valley, Ca 92553

Attn George C Price

I'm writing to you to express
 my support for the The World
 Logistics Center project. I believe
 I could see a great benefit
 for the community. Be open
 minded when review all the
 yays and nays regarding the
 future of Moreno Valley. Your
 career will end at some
 point but our lives remain
 here for years to come.

Thank You for your time
 JACQUIE DIAZ
 MORENO VALLEY RESIDENT

MORENO VALLEY CA 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 16

COMMUTING IN MORENO VALLEY

DATE 05/29/15City Council of Moreno Valley
c/o City Hall/ Clerks Office
14177 Frederick Street
Moreno Valley, Ca. 92553

Dear Council Members

I support the World Logistics Center because I would like to see my city prosper and have the opportunity for jobs here in my city. as for my experience I have had to commute for jobs to Orange county and Los Angeles that has taken many hours away from my family, finances because of all that I spend on gas and wear and tear of my car's. I would like other families to have this opportunity and that they would not have to commute to LA for years as we did

Sincerely - Beatriz Mendez
Beatriz Mendez
Moreno Valley, Ca. 92557

MAY 9, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:16

COUNCILMEMBER GEORGE PRICE
C/O CITY HALL/CLERKS OFFICE
14177 FREDERICK ST
MORENO VALLEY CA 92553

DEAR COUNCILMAN PRICE

I AM WRITING SEEKING YOUR FULL SUPPORT FOR THE
WORLD LOGISTICS CENTER PROJECT. I SUPPORT THIS PROJECT
BECAUSE I WANT A LONG AND PROSPEROUS FUTURE FOR
MORENO VALLEY. COMMUNITY AFTER COMMUNITY IS FAILING
FOR BANKRUPTCY. I HAVE LIVED IN MORENO VALLEY FOR
OVER 20 YEARS AND I WANT IT TO REMAIN A STRONG
THRIVING COMMUNITY.

BUILDING HOUSES AND RESIDENTIAL PROJECTS IS
~~NOT~~ GOING TO MAKE IT POSSIBLE TO ATTAIN THESE GOALS.
THE WORLD LOGISTICS CENTER PROJECT WILL GENERATE
THOUSANDS OF JOBS AND MILLIONS MORE IN TAX REVENUE.

THE WORLD LOGISTICS CENTER PROJECT WOULD BE
A HUGE OPPORTUNITY TO MAKE A LONG AND PROSPEROUS
FUTURE FOR MORENO VALLEY. PLEASE GIVE THIS
IMPORTANT PROJECT YOUR FULL SUPPORT.

[REDACTED]
MORENO VALLEY CA
92555

LEROY H PHILLIPS
[Signature]

4/30/2015

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -6 PM 5:16

CITY COUNCIL OF MORENO VALLEY CA
C/O CITY HALL CLERKS OFFICE
1477 FREDERICK STREET
MORENO VALLEY CA 92553

DEAR COUNCIL MEMBERS,

I really do hope that Moreno Valley can help us out with more buildings in Moreno Valley to give our community more jobs. Jobs that can be more closer to our homes, schools, and daycares. So we don't have to stress out on gas and buses to get our children from work. We need more work to help with everything. WE NEED WORLD LOGISTIC CENTER!

Marissa Moreno 22 years old
Caregiver / Retail Riverside

Sincerely,

Marissa Moreno

Moreno Valley CA 92553

May 30 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

CITY OF COUNCIL OF MORENO VALLEY
% CITY HALL/CLERK'S OFFICE
14177 FREDERICK STREET
MORENO VALLEY, CALIFORNIA 92553

15 JUL -6 PM 5:16

Dear Councilmembers;

my name is Karina Sandoval I live in
moreno valley and i'm concern about my
city that ~~is~~^{is} I support the world
Logistics center because it will bring new
opportunities to our cities and ~~for~~^{thousands} of jobs for
many many people. We need the money that this
project is going to bring in tax revenue please give
the permits to start breaking ground and we can start
enjoying the benefits

Sincerely Karina Sandoval

Karina Sandoval

Moreno Valley Ca
92553

JUN - 3 - 2015

City Council of Moreno Valley
c/o city clerk's office
14177 Frederick st.
Moreno Valley CA. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL - 6 PM 5: 16

Dear Council members

les escribo este dia para pedirles que agan todo lo posible para que este proyecto de World Logistic's center sea aprobado ustedes pueden hacerlo realidad. por favor no dejen pasar esta oportunidad. mi nombre es maria Baeza y no quiero moverme de esta ciudad por eso necesito trabajar aqui. gracias por tu atencion

maria Baeza

[REDACTED]
moreno valley CA. 92553
[REDACTED]

May 16 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 16

City Council of Moreno Valley
c/o city Hall/ Clerk's Office
14177 Frederick street,
Moreno Valley, California 92553

Dear Councilmembers;

It is a pleasure to write this letter to you. Our family and friends have seen and heard the description of this project and we have considered that it will benefit in every way, such as bringing more jobs, educationally, socially, economically, etc. It's a safe project that will keep our City clean from pollution.

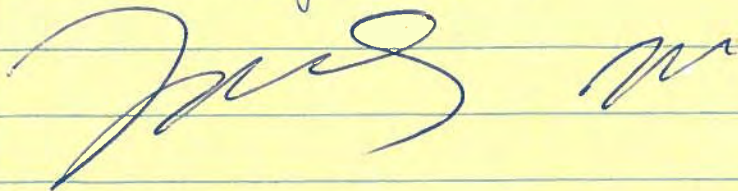
Please considerate it for it is a great opportunity for growth.

The World logistic Center will be a big step for such growth.

Sincerely,

Jesus Martin

Moreno Valley, CA 92551



To

City Council of Moreno Valley Cal
 C/o City Hall/ de Vs office
 14177 Frederick St.
 Moreno Valley Cal 92553

June 18-20

15 JUL -6 PM 5: 16
 CITY COUNCIL
 MORENO VALLEY
 RECEIVED

Yo el señor Ramon Mendez

Apoio este proyecto que se llevara acabo en esta ciudad de Moreno Valley por los beneficios que traera a nuestra ciudad.

Por ejemplo, fondos economicas para tener mejor seguridad contratando mas policias, mejorar nuestras escuelas, pero sobre todo que la gente de Moreno Valley tenga trabajo local y no haya necesidad de manejar tanto a nuestros trabajos como yo que maneje 100 millas diarias y asi poder estar mas tiempo al cuidado de nuestras familias.

[REDACTED]
 Moreno Valley Ca 92557

Ramon Mendez

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:16

May 26, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick street,
Moreno Valley, California 92553

Yo Benjamin estoi a favor de The
World Logistic Center quiero que ustedes
estén a favor de este gran proyecto para
que aiga miles de nuevos empleos para
un mejor futuro en Moreno Valley.

"Pasen los permisos por favor"

"The World Logistic center." Atte.

Benjamin Hernandez

Moreno Valley CA
92553

Benjamin Hernandez

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -6 PM 5: 16

May 26, 2015
City Council of Moreno Valley
c/o City Hall / Clerk's office
1477 Frederick street,
Moreno Valley, California 92553

Mi nombre es Gustavo ya e vivido 14 años en Moreno Valley y nunca e podido en contrar trabajo aqui siempre e trabajado fuera de la ciudad. Ya es tiempo de que ohiga trabajo en Moreno Vallex por eso les pido que aprueben el prolecto The World Logistics center. ATte.

Gustavo Esparza
[Redacted]
Moreno Valley CA
92553.
[Redacted]
Gustavo Esparza

Edith Gonzalez

Moreno valley CA 92553.

May 26, 2015

City Council of Moreno Valley
 C/o city hall clerks office
 14177 Frederick Street
 Moreno Valley CA 92553.

CITY COUNCIL
 MORENO VALLEY
 RECEIVED

15 JUL - 6 PM 5: 16

Dear Council members,

I am a resident of Moreno Valley, I have been living here about 10 years. I'm a mother of two boys and I have a husband too. I have been always looking for a job in Moreno Valley but I never have any luck. At the moment I am working in Riverside.

I know that its not far but I always have to leave about an hour early to be there in time. My boys have to always wake up earlier because I leave early to work. Most importantly I'm looking out to my kids future. I don't want them to be like me and my husband having to travel far to find the right job. It would be much better and easier to have a lot of opportunities for my kids. Most importantly its for our kids future. Please consider our petition we would really love to have these opportunities in Moreno Valley for us and our family - thank you for taking your time to read my letter and considering this project in Moreno Valley.

Sincerely,
 Edith Gonzalez

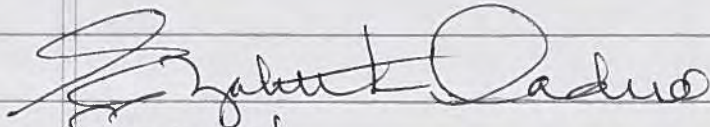
May 29, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -6 PM 5: 16


City Council of Moreno Valley
c/o City Hall / Clerk's office
14777 Frederick Street
Moreno Valley, CA 92553

Dear George E. Price;

I, Elizabeth Cordero am writing to you to express my concerns for The World Logistics Center project. This would increase jobs, revenues and city taxes for Moreno Valley. Please do not let this opportunity get away for us.



Sincerely,
Elizabeth Cordero


Moreno Valley, CA 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

18 JUL -6 PM 5:16


City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley California 92553

Dear Councilmembers,

I support the World Logistic Center business park because we need more jobs and we need them for a better future. Are parents need better jobs because they need more money for close and food and more stuff that we need. We also need more jobs in Moreno Valley so that people can have more money for gas and so our parents wont need to go out of Moreno Valley and use a lot of gas and money.

~~Very~~ Sincerely,

Fernanda Soto


Moreno Valley California

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 01

Dear ~~Council~~ Council members

City Council of Moreno Valley
400 City Hall / Clark's office
14177 Frederick St.
MV Ca 92553

Thank you Iddo for
thinking of how to
make this a better
city. You are an
Angel, and I'm
thankful for you.
No matter what the
Nay Sayers say, Iddo
has a great heart!!!
Bring the WLC Here Now!
D. Baile

City Council of Moreno Valley
40 City Hall / Clerk's office
1477 Frederick Street
Mo Valley, Ca 92553

6/4/15

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -6 PM 5: 17

Dear Councilmembers,

I strongly support the Highland
Fairview World Logistics Center project.
As an 18-year resident and telecommuter,
I welcome new jobs into our community.
Please approve this desperately needed project.

Sincerely

Carl Prude - Carl Prude
Moreno Valley Resident

[Redacted]

Moreno Valley, Ca, 92555

[Redacted]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 17

June 4, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

To fix moreno valley, we would
need to get more employment.

More employment would bring greater
prosperity of families, also better schools
would secure this awakening of Moreno
Valley.

Sincerely,

Moreno Valley Resident [REDACTED] *Miguelo Cooper*
Moreno Valley CA 92551 *ADG*

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 14

COMMUTING IN MORENO VALLEY

DATE 5/29/15

City Council of Moreno Valley
c/o City Hall/ Clerks Office
14177 Frederick Street
Moreno Valley, Ca. 92553

Dear Council Members

I support the World Logistics Center
100% I am a Licensed Contractor and
have always to do construction mostly in
Orange county and Riverside county.
This project would creat jobs for
people of this city.

I ask that the city give the
opportunity to its own residents

What Moreno Valley needs is jobs this would
free the people from hours of commuting to other
cities

Sincerely

Daniel Merdora

Daniel Merdora

Moreno Valley Ca. 92553

May 18, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 14

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

I Jesus Hernandez want the city council to approve the permits for construction of the World Logistics center because Moreno Valley needs more jobs opportunities like this one for the less fortunate like my self. Atte.

JESUSE Hernandez

Jesus Hernandez

[REDACTED]
Moreno Valley CA
92553
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:14

Abril - 30 - 2015

City Council of Moreno Valley
 c/o City Hall / Clerk's Office
 14177 Frederick Street
 Moreno Valley, California 92553

Dear Councilmembers

yo estoy escribiendo esta carta para expresar
 mi apoyo para la compañía
 The World Logistics Center Project.

Son los mejores proyectos que una compañía
 puede traer a una ciudad y que mejor que es
 en esta Cd. de Moreno Valley.

yo he vivido por los últimos 9 años en
 esta Cd. y creo que es lo mejor para
 la Cd. mas empleos es lo que necesita
 una Cd. para fortalecer su economía y su
 vivienda.

Las Cd.s. con empleo son Cd. con fuertes
 fuentes de crecimiento.

Sinceramente
 Jose Luis Gonzalez

Moreno Valley ca 92551

May 16, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 15

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick St.
Moreno Valley, CA 92553

Dear Councilmembers,

I am writing to you to express my support for the World Logistics Center project. I believe bringing jobs and economic opportunity to our city is the most important thing we can do for our community. This project responds directly to the city's Economic Development Action Plan.

This project will be a huge step to better this beautiful community.

Please, don't let this opportunity get away from us.

Sincerely,

Olia Hadidiana

[REDACTED]
Moreno Valley, CA 92555

City Council of Moreno Valley
 c/o City Hall/Clerks Office
 14177 Frederick
 Moreno valley, CA, 92553

CITY COUNCIL
 MORENO VALLEY
 RECEIVED

5/26/15

15 JUL -6 PM 5: 15

My name is Ana and I was born and raised in the city of Moreno valley. I am 19 years old, and I think the World Logistic center with benefit our community by providing jobs for the young unemployed youth of the community. I am a college student and I am not currently employed. In this city it is hard to find a job because there isn't always places hiring. I believe that the world Logistic Center will help bring jobs to the majority of unemployed people of our community. I give my full support for this project.

Sincerely,
 Ana G. Garcia.

[REDACTED]

[REDACTED]

Ana G Garcia

[REDACTED]

Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 14, 2015

15 JUL -6 PM 5: 15

City Council of Moreno Valley
City Hall / Clerk's Office
14177 Frederick St.
Moreno Valley, CA 92553

Dear Council members:

I am writing to ask to approve the World Logistic Center.

I believe this project will benefit our city of Moreno Valley it will bring jobs to our city and will also generate funds for schools and public safety that we need.

this project will benefit the commuters to be able to get a local job and spend more time with their families.

Having more jobs in the city will also stop the crime in Moreno Valley it will put people to work.

the next generation of Moreno Valley needs stable jobs, and more opportunities in their own town. I urge you to please approve this project

Sincerely

Rosa C. Martinez Rosa C. Martinez

MORENO VALLEY, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 15

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Junio 06, 2015

Sr. Gutierrez mi nombre es Jose Lopez y soy residente de Moreno Valley por 13 años. Yo considero que el World Logistic Center es un buen proyecto que no traería muchos trabajos a nuestra ciudad, que los necesitamos. Yo estoy actualmente ^{estoy} desempleado y me dedico a recoger botes para poder sobrevivir. La situación en nuestra ciudad esta muy mal, la falta de empleos causa muchos problemas mayores a todos de una manera o otra. Ojala y se decidían a aprobar este proyecto y digan sí!

Jose Lopez

Moreno Valley, CA.
92551.

June-6-2015

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -6 PH 5: 15

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street Moreno
Valley, CA. 92553

Dear Council members,
The World Logistic Center
provides Moreno Valley a lot of jobs
opportunities, to Moreno Valley residents.
It will help me to look for a job
and get hired. I don't want
to commute to different places
to find a job and not make it on
time. My father commutes an hour
to get to his job and an hour
to come back if there is no
traffic. Please approve this
Project!!

Sincerely, Adrian Maniscal

Moreno Valley
92553.

City Council of Moreno Valley
 c/o City Hall / Clerk's office
 14177 Frederick Street
 Moreno Valley Ca, 92553.

CITY COUNCIL
 MORENO VALLEY
 RECEIVED
 15 JUL -6 PM 5:15

Well I am a student from the Moreno Valley High School
 my name is Luis D. Andrade.

I heard about the project and it's very interesting.
 The World Logistics Center!

There will be a lot of new jobs,

I'm going to the College next year and

I'm very excited to know that when I

finished my school I will be able to

have a job.

That's why I support the World Logistic
 Center and I hope they approve this project.

Atte

Luis D. Andrade

Moreno Valley Ca,

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 15

June 4, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I believe that there should be more programs for people to receive jobs. There should also be more constructive programs to help keep teenagers off of the streets. I also think that more jobs would greatly benefit Moreno Valley.

Sincerely, *Kimberlyn Gilbert*
Kimberlyn Gilchrist
Moreno Valley Resident[REDACTED]
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 15

May ~~16~~ 2015

CITY COUNCIL OF MORENO VALLEY

C/O CITY HALL/CLERKS OFFICE
14177 FEDERICK ST.
MORENO VALLEY CAL. 92553

Dear, council members

I am a nine year old boy that wants to become an inventor and I believe that the world LOGISTICS center project will be an open door for me and others I hope to hear you will do everything necessary to make this project possible

Sincerely, Isolt Martin

[REDACTED]

moreno valley nine two five five
92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

05/16/15

15 JUL -6 PM 5: 15

city council of Moreno Valley
% city Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, CA 92553

Dear council members;

My name is Ruben Muñoz I have live in this city enough time to know that this city needs, and havent have for years - Jobs. I support the world logistic center Business park, because the revenue tax money is so need, it in our community, I demand of all of you - to get your heads together and approuse this project. not only you will be saving our new generation, also saving the city having finally a work base that will give the residents of MORENO valley a new life style. you - can not take away the advance and opportunity to our new generation as I mention before.

This ^{business} park is gona be green friendly as the building at sketcher - Pleas do your job - approuse this project

Sincerely
~~Ruben Muñoz~~

~~2419~~

Moreno Valley CA 92553

JUNE 6th 2012CITY COUNCIL
MORENO VALLEY
RECEIVED

City Council of Moreno Valley 15 JUL -6 PM 5: 15
 C/o City Hall / Cheryl's office.
 14177 Frederick Street,
 Moreno Valley CA 92553

I had lived in Moreno Valley 6 years ago.
 I have 2 children.
 I am a housewife, I'm active in church
 Zion centro de Adoracion. I commuted 7
 years ago.

I think the world Logistics project is
 good for the future of my children because
 I think we need to spend more time
 together, when the parents go to their
 jobs. they spend too much time driving
 to the other cities. I know it is important to
 generate more jobs.

Elena Estrada
 Moreno Valley CA 92553.
 [REDACTED]
 Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:13

06 JUNE 2015

CITY COUNCIL OF MORENO VALLEY
C/O CITY HALL - CLERKS OFFICE
14177 FREDERICK STREET. MV92553

I have resident of Moreno Valley since 1989 and enjoy very much witness my city progress and prosper.

As a former business owner in the city of Riverside I envisioned to have my business here in the city where I love, but the city make it very hard to fulfill my dream and have no choice to open the business in east Riverside.

I strongly support the World Logistics Center so we can see our city create the much needed jobs here so all residents enjoy a different quality of life and all witness the benefits of prosperity.

Please support this great opportunity so we all can benefit for decades to come.

Sincerely,

Rosalia R. Aragones
Robin R. [Signature]

Rosalia Aragones

[Redacted]
Moreno Valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

6 JUN 15

I Have lived in ^{15 JUN 15 PM 5:11} ~~MO VAL~~ FOR OVER
TWENTY YEARS. I HAVE ONE CHILD AT
HOME. I AM A REAL ESTATE AGENT.
I SUPPORT THIS PROJECT.

Kenny Gildersleeve
KENNY GILDERSLEEVE
[REDACTED]
MORENO VAL, CA 92557

D NELSON
23405 Seafarer way
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:14 Jun 6 - 15

city council of Moreno Va
c/o city Hall / Clerks office
14177 Frederick St
MORENO Va. Ca 92553

I've lived in Moreno Valley for
30 yrs. My 2 children went
to Moreno Valley schools.

I'm a retired teacher but
my wife is still active in
church functions and civic
activities.

I think that the commnt.
affects everybody in time with
family and community. I think
the logistic center would solve
some of this.

Sincerely
D. Nelson

[Redacted signature]

May 30, 2015
City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street,
Moreno Valley, Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

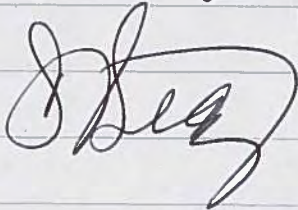
15 JUL -6 PM 5:14

Dear George E. Price,

I am writing to you to express my support to the world logistic center. I have lived in Moreno Valley since 1992 and I am ready to see more revenue and jobs brought to our city. The future leaders of our city will depend on this.

Sincerely,
Stephanie G. Diaz

[REDACTED]
Moreno Valley Ca 92555



CITY COUNCIL
MORENO VALLEY
RECEIVED

COMMUTING IN MORENO VALLEY

15 JUL -6 PM 5: 14

DATE 5/29/15


City Council of Moreno Valley
c/o City Hall/ Clerks Office
14177 Frederick Street
Moreno Valley, Ca. 92553

Dear Council Members

I support the World Logistics
I am a college student and would like
the opportunity of having jobs in my
City and not have to do what my parents
have done for years which is
commuting to other cities for jobs.

I ask that you please allow the
Residents of Moreno Valley to have
that opportunity

Sincerely


Ryan Mendez
Moreno Valley, 92557

COMMUTING IN MORENO VALLEY

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 14

DATE 5/29/15

City Council of Moreno Valley
 c/o City Hall/ Clerks Office
 14177 Frederick Street
 Moreno Valley, Ca. 92553

Dear Council Members

I am writing this letter in support of the World Logistics Center in Moreno valley. I believe Moreno valley has great potential to develop in many ways, by creating more jobs, and less traffic to orange County and Los Angeles. In my own experience, I have dealt with traffic for several years because the larger pool of job opportunities are outside of Moreno Valley. As a result of creating more jobs in Moreno Valley, we as a city can help build our future generations. Commuting in Moreno valley would make our city grow and have a positive impact on our unemployment rate.

Sincerely,
 Erika Miranda
 - Erika Miranda

Moreno Valley, CA 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 14

May 29, 2015

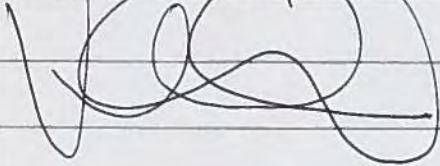
City Council of Moreno Valley
c/o City Hall / Clerk's Office
19177 Frederick Street
Moreno Valley Ca 92553

Dear GEORGE E PRICE,

I Grew up in Moreno Valley, I am 21 years old. I would love to see world logistics come to Moreno Valley to bring jobs to the future of our city. I have had difficulty finding good jobs in our area. I have to commute, giving my taxes to other cities. Please consider this wonderful project for the better of our future.

Sincerely,
Vivian C. Cordero

Moreno Valley Ca 92555



CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 14

Mail 07/15
City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California ~~92553~~ 92553

Dear councilmembers,

I support the world Logistic Center business park because we need more jobs for a better future. Our parents need a job to get money so that they can buy us food and clothes. We also need more jobs in Moreno Valley so that our parents won't have to drive out of Moreno Valley and ~~use~~ use a lot of gas. They also will be able to have more time to get ready and eat. They won't ~~be~~ be in a hurry to get to their job.

Sincerely,

Laura Ochoa

~~Moreno Valley, CA 92553~~
Moreno Valley, CA 92553

05/30/2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:14

city of council of Moreno Valley
% city Hall / clerk's office
14177 Frederic-street
Moreno Valley Calif. 92553

Dear D. Ladonna Jempson - You are my council woman. my name is Juan Carlos Sandoval - I support the World Logistic Business park in it's totality. I Demand you, for the benefit of my city to Pass all the permits for the project we need the Jobs, Moreno Valley is a bedroom city only no Jobs, no Jobs here please be wise and do your job you were elected to do the best for our city and also for the generations to come.

Sincerely

Juan Sandoval

Juan Carlos Sandoval

Moreno Valley CA 92553

5-30-15

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:14

City Council of Moreno Valley
40 City Hall / Clerk's Office
14177 Frederick Street.
Moreno Valley California 92553

Estimada Concejala D Ladonna Jempson
mi nombre es Rosa Mendia M. esposo si
empie pasa trabajado Fuera De la ciudad.
porque la mentablemente en nuestra
Ciudad no tenemos trabajos. yo toda
mi familia apoyamos el proyecto que esta
proponiendo se en nuestra Ciudad. ya
mado. the World Logistics Center,
el cual traiga miles y miles de oportunidades
de trabajo a nuestra Ciudad a demas.
Cesguimos sin trabajos pronto la Ciudad
estara en Bonna rota ~~se~~ necesitamos el
Dinero de este proyecto en impuestos yo
Como Ciudadana de Moreno Valley de
mondo que seden los permisos para
este proyecto.

Sinsera Mente
Rosa Mendia

Rosa Mendia

M. V. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

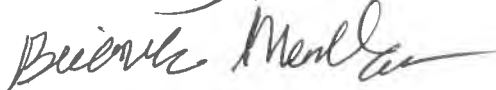
15 JUL -6 PM 5: 14

COMMUTING IN MORENO VALLEY

DATE 5/29/15City Council of Moreno Valley
c/o City Hall/ Clerks Office
Frederick Street
Moreno Valley, Ca. 92553

Dear Council Members

I am in support of the World Logistics Center because I myself work outside of Moreno Valley and would love to see more jobs available for our community. This can only be a positive thing. A lower unemployment rate, happier homes, and a more successful future.

Sincerely,


Blanka Mendora


Moreno Valley, CA 92557

TO: GEORGE PRICE, DISTRICT 3

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUNE 6 2015

15 JUL -6 PM 5: 13

CITY COUNCIL OF MORENO VALLEY
C/O CITY HALL/CLERKS OFFICE
14177 FREDERICK ST.
MORENO VALLEY, CA. 92553

DEAR COUNCIL MEMBERS.

MY NAME IS LEO TAFOYA. I HAVE LIVED IN MORENO VALLEY SINCE 1988. MY WIFE'S NAME IS BARBARA TAFOYA. WE HAVE 2 DAUGHTERS, AGED 34 AND 38. WE ALSO HAVE 7 GRANDCHILDREN AGED BETWEEN 1 AND 13. MY OLDEST DAUGHTER LIVES HERE IN MORENO VALLEY WITH HER HUSBAND AND 3 CHILDREN. THE OLDEST ATTENDS "BEAR VALLEY ELEMENTARY," HER OTHER 2 CHILDREN, TWINS AGED 5, WILL START SCHOOL IN AUGUST. MY WIFE WORKS FOR THE MVUSD IN THE CENTRAL KITCHEN, FOOD SERVICE. SHE HAS WORKED FOR THE SCHOOL DISTRICT FOR 26 YRS. MY OLDEST DAUGHTER, HEATHER, HAS WORKED FOR THE MVUSD FOR 1 YEAR AS A SPECIAL NEEDS/TEACHERS ASSIT. BOTH OF MY DAUGHTERS GRADUATED FROM VALLEY VIEW. MY OLDEST DAUGHTER ALSO ATTENDS NIGHT SCHOOL AT MORENO VALLEY COLLEGE, THE REASON FOR THIS BIO IS TO GIVE YOU SOME BACKGROUND OF MY FAMILY'S M.V. HISTORY.

(1)

WHEN WE MOVED HERE, HOUSING WAS BOOMING, MARCH WAS STILL AN ACTIVE AFB WITH THOUSANDS OF SERVICEMEN LIVING AND SPENDING HERE IN OUR CITY. WELL, AS WE KNOW THE HOUSING BOOM ENDED, MARCH WAS REDUCED TO A RESERVE BASE.

SUDDENLY, MUCH OF THE CITY'S REVENUE STREAM ENDED. BUSINESS WHO MOVED HERE IN ANTICIPATION OF A GROWING MARKET STARTED CLOSING AND LEAVING OUR CITY FURTHER REDUCING CITY REVENUES.

FAST FORWARD TO THE PRESENT, APPROX 20000 RESIDENTS, HIGH UNEMPLOYMENT RATE. UNABLE TO FULLY FUND LAW ENFORCEMENT, RESULTING INCREASE IN CRIME.

FIRE DEPT- ^{MORE} FIRE HOUSES AND FIREMEN, EMERGENCY RESPONSE TIME-LENGTHENED RESULTING IN INCREASE LOSS OF LIFE, PROPERTY DAMAGE, STREET MAINTENANCE POT HOLES, ETC. DAMAGE TO VEHICLES, INCREASED ACCIDENTS, PROPERTY DAMAGE. PARKS AND SERVICES, FUND MORE AFTER-SCHOOL AND SUMMER PROGRAMS TO ENCOURAGE YOUTH PARTICIPATION, INSTEAD OF JOINING GANGS ETC. VOCATIONAL TRAINING, HEALTHCARE

AND MUCH MORE. THE CITY IS FAILING ITS DUTY TO PROVIDE THESE SERVICES TO ITS CITIZENS. THE CITY NEEDS LESS TALK AND MORE ACTION IT TAKES YEARS FROM PLANNING TO ACTUALLY BUILDING, WE NEED TO CUT THAT TIME ASAP. WE NEED REVENUE NOW. OUR PEOPLE NEED ACTION NOW.

WE HAVE A GOLDEN OPPORTUNITY STARING US IN THE FACE, THE COMPANY IS HIGHLAND FAIRVIEW, ITS CEO IS IDDO BENZEEVI. WHO IS HE? A

LONG TIME RESIDENT OF THIS CITY. FOR 30 YEARS HE HAS BEEN IN THE BACKGROUND PROVIDING FUNDS AND SUPPORT FOR VARIOUS CITY NEEDS AND PROGRAMS AND NOT ASKING FOR ANY RECOGNITION. HE JUST DOES THE RIGHT THING. HE PUT HIS MONEY WHERE HIS MOUTH IS, HIS MOST VISIBLE PROJECT WAS SKECHERS.

1.82 MILLION SQFT, LEED-GOLD CERTIFIED, CERTAINLY NOT A DEVELOPER WHO'S ONLY INTEREST IS TO BUILD AND LEAVE TOWN. HE HAS THE MEANS, THE DRIVE, THE EXPERTISE THE PRIDE, TO BUILD, DEVELOPE MANY DIFFERENT PROJECTS IN OUR CITY, HIS CITY,

IT IS SO EASY TO SAY NO, FOR YEARS THE SAME PEOPLE WHO HAVE SOMEHOW TAKEN IT UPON THEMSELVES TO SAVE US FROM ALL THE WOES OF THE WORLD, HAVE DONE NOTHING POSITIVE OR CONSTRUCTIVE TO HELP OUR CITY. WE HAVE A CHECKS + BALANCES TYPE OF CITY GOVERNMENT, THERE ARE MANY, MANY STEPS BETWEEN THE EIR AND THE FINAL INSPECTIONS, WE HAVE THE OPPORTUNITY TO VOICE OURSELVES AT EACH STEP. H/F HAS SHOWN VERY HIGH STANDARDS OF ENVIRONMENTAL RESPONSIBILITY, AND THERE IS NO REASON TO BELIEVE IT WOULD NOT BE THE STANDARD FOR THE REST OF THE DEVELOPMENT. IT WILL TAKE SEVERAL YEARS FOR BUILDOUT AND WE NEED TO MOVE NOW. NONE OF THE DOOM AND GLOOM PEOPLES PROPHECY ABOUT THE SKETCHER'S PROJECT CAME TO PASS.

LET'S BE HONEST, THE HOUSING BOOM WILL NOT HAPPEN AGAIN THE BASE WILL NOT EXPAND, ~~THE~~ THE HOUSE PROPERTY PEOPLE ARE NOT GOING TO DEVELOPE THE EASTEND. IT HAS BEEN VACANT FOR YEARS WE HAVE A PROPOSED PROJECT THAT IS A WIN FOR THE CITY, MORE TAX REVENUE A WIN FOR THE PEOPLE - MORE JOBS, A WIN FOR THE ENVIRONMENT, VACANT DIRT- RESPONSIBLY DEVELOPED, IMPROVED SERVICES.

~~INSTEAD OF~~ DO WE WANT TO MOVE AHEAD?

THERE ARE PLENTY OF OTHER CITIES READY TO SAY YES TO THESE SAME COMPANY'S BUILDING IN THEIR CITIES. WE HAVE THE OPPORTUNITY TO BE THE LEADER AND THE ENJOY OF SOCIALS LOGISTICS BUSINESS. 2015 IS THE LARGEST YEAR YET IN LOGISTICS BUILDING IN S.O. CA.

SINCERLY

LEO TAFAYA

BARBARA TAFAYA

MORENO VALLEY-DISTRICT 3

RESIDENTS SINCE 1988



MORENO VALLEY, CA

92555-5249

MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:40

May 27, 2015

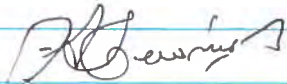
City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Councilmembers:

I am writing to you today to ask you that the World Logistics Center gets approved here in Moreno Valley. I enjoy living in Moreno Valley and I want the best for the community and my family. The entire community will benefit in one way or another from this project as it will not only bring a lot of jobs to the city. But it will also generate millions in fees putting Moreno Valley on the map. Many of our families are forced to commute spending hours every day to get to work. Please help the families of Moreno Valley to have a better future and to spend more time with their families and approve this project.

Hoping that you make the best decision for our city and say yes to this amazing project.

Sincerely



LEON A. ENDERICA

Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

Moreno Valley

Dear Council members

15 JUL -7 PM 4:40

I lived in Moreno Valley for 29 yrs. I have 2 children. I'm retired and this allows me to be very active in the community. I'm a volunteer for Discovery Christian Church, advocate for the Salvation Army, United Way and the MV school district.

I'm writing this letter in support for the World Logistics Center Project. Not living in Moreno Valley now, I see the value of this project. It will bring jobs not only jobs to Moreno Valley but to the surrounding cities as well.

The amount of tax dollars that Moreno Valley will receive from this project will benefit the city in many ways. It will give additional monies for Police & Fire Protections, street repairs, Park & Rec Budget, additional monies to be distributed to non-profit organizations. With the increase in employment, individuals will want to live close to their jobs. This will create a housing need and higher home values. Please consider voting YES to this project.

Thomas Finch

[REDACTED]
Hemet, Ca 92543

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 40

5/15/15
City of Moreno valley city and Mayor

City Hall/clerk's office:

14777 Frederick street,
Moreno Valley, California 92553

Dear Council member:

I'm a Resident of Moreno valley, for the last
22 years, Home Owner, mother of 6 children
and GrandmotherI have seen The presentation and
I think will benefit The city, and
will bring very good Revenue to
Riverside, County, in Gr. A.Specially in the city that I live
Moreno valley,We know The major need is Jobs
we have to go so far to look for
work and leave our families alone
my husband works in Sea and
when he comes home is veryTired and I know that
The world Logistic Center
will help many families
Please SUPPORT This Project
Thank you very much

MARGARITA PEREZ

Margarita Perez
[REDACTED]

Moreno valley cal

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:40

11/11/11

City Council: de Moreno Valley.

% City Hall / Clerk's office

14177 Frederick Street.

Moreno Valley, California. 92553.

Señores Consulers.

En esta carta les hago saber my deseo, de apoyar el proyecto
de World Logistics Center project.

Por que creo que travera. un gran beneficio. a la ciudad.
de Moreno Valley.

He vivido en esta Ciudad por 6 años.

Tengo 7 hijos. fui Joyero Toda mi vida. y hoy

Soy compositor de musica Cristiana

y estoy Retirado. tengo 76 años de edad. y pienso que

para la Juventud. el proyecto es magnifico. pres
ayudara a muchos Jovenes.

Mi nombre es: Luis Humberto Saldaña, Soy Residente
de Moreno Valley y vivo en:

[Redacted] Moreno Valley California.
92553.)

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 40

5/10/2015
Enedina Velazquez
A. A. Dina

[REDACTED]
Moreno Valley CA 92553
[REDACTED]

I have lived in Moreno Valley for three months. I have one child. My occupation is a substitute clerical for Alford Unified School District. I am active in sports with Inland United Soccer league Brasil U15 girls. I am the team manager.

I have been commuting to work for three months. Commuting does cause stress and it hurts affects my family in the commute.

The World Logistics Center project will will provide more local jobs.

The World Logistics Center project will provide more family to keep their money spend in this city Moreno Valley.

Singeley
[Signature]

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUN - 3 - 2015

15 JUL - 7 PM 4:41

City council of moreno valley
c/o city clerk's office
14177 Frederick st.
Moreno valley CA. 92553

Dear councilmembers

Yo Rafael Melendrez estoy solicitando que apoyen el proyecto de World Logistics Center porque necesitamos mas trabajos en nuestra ciudad. Mi deseo es que esta ciudad progrese y este proyecto va a ser de mucho beneficio para nuestros Familias. Por Favor no dejen pasar esta oportunidad.

atentamente

RAFAEL MELENDRIZ

[REDACTED]
Riverside CA. 92509

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 41

May 18, 2015
City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street.
Moreno Valley CA 92553

El motivo de esta carta es para pedirles que pasen los permisos para The World Logistics Center para que mi esposo que trabaja en Long Beach tenga una fuente de trabajo aquí en Moreno Valley y no tengo que salir a las 3:00 AM y regresar a las 7:00 P.M. . Para que pueda darles mas tiempo a nuestros hijos que solo el fin de semana puede estar con ellos. yo tengo temor que por falta de su presencia ellos busquen malas companias. Atte.

Maria de los Angeles Ponce

Moreno Valley CA
92553

Maria Ponce

05-18-2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:41

City Council of Moreno valley
c/o City Hall /clerk's office
14177 Frederick Street,
Moreno valley, California 92553

Mi nombre es Brenda Galicia Soy ama de casa, tengo un hijo y mi esposo quien sale a trabajar desde madrugada buscando el sustento del hogar el cual llega por la tarde Pasando mucho trafico, y pienso y apoyo este Proyecto porque se que beneficiara a muchas Personas tanto como jovenes y Padres de familia, trairia ayuda economica y suficientes empleos habria un levantamiento economico Para la Ciudad el cual ayudaria a Hospitales, escuelas. habria mas Puestos de empleo el cual ayudara a que las Personas no salgan a trabajar fuera de la Ciudad.

Brenda Galicia


Moreno valley, California 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 41

JUNE 18-2015

To
City Council of Moreno Valley
% City Hall / Clerk's Office
14177 Frederick St
Moreno Valley Ca 92553

Aprobo el proyecto, Eso va a traer mucho beneficio a nuestra ciudad, Beneficio a las escuelas Necesitamos mas seguridad, en nuestra ciudad, mas policia, y con este proyecto, entra dinero, y se puede tener mas vigilancia, ya no tendremos que salir a buscar trabajos fuera de aqui ya no pasaremos horas en el Fwy todo seria diferente

Bienvenido este Proyecto
Lo apoyo al 100%

Jesús Guerrero

[REDACTED]
Moreno valley ca 92553

JUNE - 6 - 20 - 15

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL - 7 PM 4: 41

CITY COUNCIL OF MORENO VALLEY
610 CITY HALL / CLERK'S OFFICE
14177 FREDERICK ST
MORENO VALLEY CA 92553

agradezco correspondo

mi nombre es Maria Elena Baca
vivo en esta ciudad de Moreno
hace 30 años

tenemos mi esposo y yo 3 hijos
mi ocupacion es el hogar

partesca a la Iglesia contra Cristiano SINAI
por 29 años al trabajado con la
comunidad con nuestra Iglesia

astomas todas estas propositos que
se lleven a cabo porque esperamos
FUTUROS para nuestros Generaciones
oramos para que todo se lleve a cabo

Sinceramente

Maria Elena Baca

Maria E Baca

Moreno Valley CA 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 40

May 26, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Councilmembers;

I have been living in Moreno Valley for 30 years, my husband and I work outside Moreno Valley he works in San Diego, and I work in Cabazon we both have to commute long hours to work because we have been unable to find a job in Moreno Valley, we have no jobs in the City.

I am very tired of the long commutes every day, my husband and I hardly spend any time together, the only time we are together we are so tired we basically just want to rest. This is not a way to live a healthy life, something must be done.

The Solution to stop this long commutes is to approve the World Logistics Center and to better the lives of the Moreno Valley Community.

Council members the decision is in your hands and you owe it to us to give us a better Moreno Valley, Say Yes to the World Logistics Center.

Sincerely,

BENITA Palominos *Benita Palominos*

Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:40

June 4, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

Making more jobs available for people with
enough money to be able to support their
families and live a good life.

Sincerely, Jack Sparrow
Moreno Valley Resident
[REDACTED]
Moreno Valley CA 92553

MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:40

May 26, 2015

City Council of Moreno Valley
 c/o City Hall clerks office
 4177 Frederick Street
 Moreno Valley, CA 92553

Dear Council members,

I am a resident of Moreno Valley. I have been living here for about 12 years. I am a father of 2 boys and I have a wonderful wife. I have to always wake up at 3:30 am to get ready for work. Every day I leave for work at 4 am, because I work in Los Angeles. It's very hard because I leave early and I get home really late. I don't have time for my family. I really want this project to happen because if I had a job here in Moreno Valley I would have more time with my family. This city needs the money and we need the jobs too. It works both ways. Thank you.

Wis Selvan Torres

Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-26-15

15 JUL -7 PM 4:40

City Council of Moreno Valley City Hall/Depts office
14177 Frederick St Moreno Valley Ca 92553

I am writing you this letter in support of Highland Fairview World Logistics Center project as a ~~resident~~ resident and Business man in Moreno Valley. I feel we need more development that will bring jobs and income to the city very badly.

As a person who has had to drive the 91 Freeway over 100 miles home trip for many years. I know how important it is to create local jobs in Moreno Valley so I urge you to pass this project as soon as possible.

Thank you

Craig Smith

[Redacted]
Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:40

JUNE 16 - 2011

To

City Council of Moreno Valley CA
c/o City Hall/Clerk's Office
14177 Frederick St.
Moreno Valley CA. 92553

yo Irma Mndez
Estoy de Acuerdo. y apoyo este
Proyecto.
Pues aci nos fraera Grandes
Beneficios Como son
Nuestras Calles. y la Seguridad.
Que es muy Importante
de Tener más policia. que
Cuiden. y Guarden el Orden.
yo Apollo. a Nuestra
Comunidad. Como es Moreno Valley

Irma Mndez,
[REDACTED]
Moreno Valley
cal 92557

MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:40

MAY 23, 2015

CITY COUNCIL OF MORENO VALLEY
C/O CITY HALL / CLERK OFFICE
14177 FREDERICK STREET
MORENO VALLEY, CA 92553

DEAR COUNCIL MEMBERS;

I'M WRITING TO YOU TO EXPRESS MY SUPPORT FOR THE WORLD LOGISTIC CENTER PROJECT. I BELIEVE THIS PROJECT WILL BRING GOOD HIGHLY PAID JOBS THAT THIS CITY NEEDS. I HAVE LIVED IN MORENO VALLEY FOR 27 YEARS AND HAVE SUPPORTED THE CITY WITH PROPERTY TAXES I PAY. I AM CURRENTLY EMPLOYED BY CALTRANS AS AN ENGINEER. I AM CURRENTLY ATTEND ST. PATRICK'S CATHOLIC CHURCH AND A MEMBER OF KNIGHTS OF COLUMBUS.

I HAVE COMMUTED OFF AND ON FOR MANY YEARS BUT WOULD MUCH PREFER TO WORK CLOSER TO HOME. WHEN SPENDING TOO MUCH TIME COMMUTING, THERE IS LITTLE TIME TO DO ERRANDS AND TASKS AROUND THE HOUSE. THE WORLD LOGISTIC CENTER IS HIGH TECH AND WHERE THE FUTURE IS HEADED. LET'S GET ON BOARD RIGHT NOW SINCE A GOOD OPPORTUNITY IS BEFORE US.

THE FUTURE IS NOW AND THE WORLD LOGISTIC

IS WHAT THIS COMMUNITY DESPARATELY NEEDS.
I SUPPORT ~~THE~~ THIS PROJECT 100%.

SINCERELY,

LEONARD ROMERO, Leonard Romero
MORENO VALLEY RESIDENT



MORENO VALLEY, CA 92555

June 6 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 43

City Council of Moreno
Valley c/o city Hall/derk's
office 14177 Fedrick
Street Moreno, California
92553

I have lived in Moreno Valley for 10 years.
Please approve the building the World Logistics
Center. ~~For~~ For a better future. So that people can
get a job here in the city and don't have to
commute out of town to go to work and
they can spend more quality time with the family
so that people can have economic to give to
their ~~no~~ family. So I please urge to give
the building permits to build the world logistic
center.

Jackie Avila

Moreno Valley

Ca 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 42

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

JUNIO/11, 2015

YO LUZ MARIA PERAZTA TENGO 5 AÑOS
VIVIENDO EN MORENO VALLEY, CA, TENGO 4 HIJOS.
MI OCUPACION ES AMA DE CASA Y OCACIONAL VENDO
DIFERENTES PRODUCTOS DE BELLEZA Y PARA EL HOGAR
ESTOY ACTIVA EN LAS 3 DFERENTES ESCUELAS DE MIS
HIJO INVOLUCRANDOME EN SU EDUCACION Y. EN TODO
LO QUE CONILUE SU DESARROLLO EMOCIONAL, Y PROFE
SIONAL. APOYO ESTE PROYECTO POR LA FALTA DE
EMPLEOS EN MI CIUDAD X ~~QUE~~ ELLO ~~REQUIERAN~~ PER
DENOS TIEMPO EN LA FAM. X LAS HORAS DE
TRAFICO QUE PIERDE MI ESPOSO AL TRABAJAR
LEJOS DE LA CIUDAD.

Y CREO QUE ESTE PROYECTO AYUDARA A
MEJORAR LOS SERVICIOS Y. TODOS BENEFICIOS.
PARA MEJORAR EN TODOS LOS ASPECTOS. DE LAS
FAMILIAS Y ECONOMIA DE TANTOS AQUI EN MORE
NO VALLEY.

Luz Maria Perazta.
[REDACTED]
[REDACTED]
[REDACTED]
MORENO VALLEY, CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

6-6-2015

CITY COUNCIL OF MORENO VALLEY
40 CITY HALL CLERK'S OFFICE
14177 FREDERICK STREET.
MORENO VALLEY CALIFORNIA 92553

APRECIADOS MIEMBROS DEL CONCLILIO
RAUL GARCIA YO TENGO 10 AÑOS
EN MORENO VALLEY YO NO TENGO
TRABAJO Y ES MUY IMPORTANTE
Y A MI HIJA SE LE ACABO EL TRABAJO
NESECITAMOS MAS TRABAJOS EN
MORENO VALLEY

EL PROYECTO DE WORLD LOGISTICS
TRAIDA MILES DE TRABAJOS CENTER
Y MUCHOS MILLONES A LA CIUDAD
AYUDARA A NUEBA GENERACIONES
PASEN LOS PERMISOS
BINSERA MENTE GRACIAS

RAUL GARCIA Raul Garcia

MORENO VALLEY CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:42

MAY 26, 2015

City Council of Moreno Valley
c/o City Hall / clerk's office

14177 Frederenik Street, Moreno Valley, CA 92553

Dear Councilmembers,

My name is Benjamin Mariscal I am married and have 3 kids I have live in Moreno Valley for seven years. I currently work in Riverside and have been driving to work for seven years. It is very exhausting having to wake up hours before my start time, due to traffic. I heard a lot about the World Logistics Project and how it is going to bring more jobs to Moreno Valley.

Sincerely,

Benjamin Mariscal

Benjamin Mariscal
Moreno Valley Resident[REDACTED]
Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:42

May 22, 2015

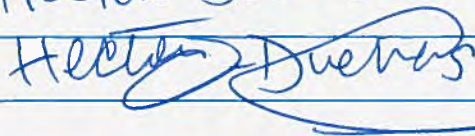
City Council of Moreno Valley
c/o city Hall / clerks office
14177 Frederick street,
Moreno Valley, California 92553

Dear Councilmembers:

Im writing to you to express my support for the World Logistics Center project. I support this project because I do believe that Moreno Valley needs more jobs. I think that this would help the community because as the population increases with people in Moreno Valley. There would have to be more opportunities for people to get jobs. I think this would benefit Moreno Valley's community.

Sincerely,

HECTOR-DUENAS



Moreno Valley Resident

[REDACTED]
moreno valley CA, 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:42

May 13, 2015

To: City Council of Moreno Valley.
c/o City Hall Clerk's office
14117 Frederick Street
Moreno Valley, Ca 92553

Dear Councilmember

I am writing you to respectfully request that you support The World Logistics Center project. I support this project because I believe that bringing jobs and economic opportunity to Moreno Valley is the most important thing we can do for our community. This project reflects and responds to the city's adopted Economic Development Action Plan which will be a huge step to the economic enhancement of Moreno Valley. We cannot afford to miss this huge economic opportunity for Moreno Valley.

Please don't let this opportunity pass by our great city

Thank you.

Sherman [Signature]

[Redacted]
Moreno Valley, Ca. 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUN - 3 - 2015

15 JUL - 7 PM 4: 42

City council of moreno valley
c/o city clerk's office
14177 Frederick st.
Moreno valley CA. 92553

Queridos miembros del concilio de Moreno Valley, yo maria guardado les pido que por favor apoyen este proyecto de World Logistics Center, en esta ciudad a aumentado mucho el crimen y la ciudad no tiene dinero para pagar y este proyecto va a traer mucha ayuda a nuestra economia. gracias por su atencion

MARIA GUARDO


moreno valley ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:42

6-4-15

City Council of Moreno
ValleyC/O City hall / Clerks
Office14177 Frederic Street
Moreno Valley, California 92553

My name is Everardo Lopez
and I am a strong supporter
of the world logistic center project,
and think its very good and
helpful for my future and other
teenagers. I am from Sunnymead
middle school. And please unvail
the project and dont deny
the project please.

Sincerely,
Everardo Lopez

Webster ave 92553



California

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 42

to
city council of moreno valley
c/o city Hall/depts office
14177 Frederick st.
moreno valley calif. 92553

queridos miembros del conujo, escribo esta carta para apoyar el proyecto de world logistics center porque, mis hijos traban muy lejos porque no hay trabajo aqui en moreno valley y casi no tienen tiempo para estar con su familia y por eso tienen muchos problemas en su casa con sus hijos y ademas necesitan mas policia para cuidar a los que vivimos aqui gracias,

Francisca cardenas

moreno valley ca. 92553

Francisca Cardenas

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 41

to
city council of Moreno Valley
c/o city Hall/Clerk office
14777 Frederick St.
Moreno Valley CA. 92553

Mi nombre es Delfina Lopez
I support World logistic center
Contributing with the City
out growing needs bringing
jobs for our community in
support in sponsors our schools
with that money they are going
to recieve from tax revenues

Sincerely

Delfina Lopez
[Redacted]

Moreno Valley CA 92551
[Redacted]

Delfina Lopez

CITY COUNCIL
MORENO VALLEY
RECEIVED

6-2-15

15 JUL -7 PM 4:54

City Council of Moreno Valley
 % City Hall / Clerk's office
 14177 Frederick Street,
 Moreno Valley CA 92553

Attention: Council members:

I am 21 years old and I am having
 a hard time finding a job. I need a
 job closed to my school my transportation
 is the bus. We need new jobs for our young people
 I hope you consider my ~~pe~~ petition to approve
 the World Logistics Center,

Thank You,
 Steven Romero

Moreno Valley CA
 92555

Steven Romero

CITY COUNCIL
MORENO VALLEY
RECEIVED

4 JUNIO 15

15 JUL -7 PM 4: 44

City Council of Moreno Valley
c/o city hall / clerks office
14777 Frederic. street
Moreno Valley Ca. 92553

Hola Como estas. este Dia mi Nombre
es Christian Aron Butierrez Vivo en la
Ciudad Moreno Valley hace Aproximada-
mente. 7 Año y medio. Cuanta que
en esta Ciudad. noy trabajo y me
pregunto. Que sera del futuro de esta
ciudad. en los años venideros Por Favor
los pedimo que aprueven este proyecto
para nuestro bien y de la ciudad. y
sus habitantes.

a Prueben este Proyecto World. logistias
contor. So los agradecemos Siempre.
muchas gracias Por So Cooperacion

Atte Christian Aron. 6tz

Moreno Valley Ca.
92553.

CITY COUNCIL
MORENO VALLEY
RECEIVED

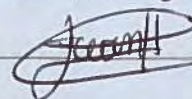
May 18, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick street
Moreno Valley CA 92553

15 JUL -7 PM 4:44

Yo he vivido por 14 años en la ciudad de Moreno Valley, tengo 3 hijos adolescentes que no he podido convivir con ellos porque he pasado mas tiempo fuera de la ciudad por motivos de mi trabajo que se encuentra fuera de la ciudad. Porque salgo muy temprano y regreso muy tarde a mi casa por eso pido por favor que pasen los permisos para The World Logistics Center para que mis hijos adolescentes tengan fuentes de trabajo cerca de su hogar y no sufran lo que yo he sufrido. Atte.

Juan Hernandez

[REDACTED]
Moreno Valley CA.
92553
[REDACTED]

May 12, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:44


City Council of Moreno Valley
c/o city hall / clerk's office
14177 Frederick Street
Moreno Valley CA 92553

Dear Council members

My name is Luis Maldonado I have been living for the past 6 years I'm father of three children. I work in a construction company. I had been commuting for 4 hours a day I have a great concern I leave my family every day for about 15 hours my children need me. I can't find a job here in Moreno Valley CA

I support the WLC Project that will bring jobs to Moreno Valley. It will bring great tax revenue / to the city we will have a better community, better school for our children, better security better job opportunity

I demand to pass this project and make it a reality for a better Moreno Valley


Moreno Valley CA
92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 43

June 11, 2015

City Council of Moreno Valley
CPO City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:
Moreno Valley needs to be
improved. The city should provide
more jobs.

Sincerely,
Charlotte O. (Junior)
C. Owens
Moreno Valley Resident
[Redacted]
Moreno Valley CA 92551

May 15, 2015

City Council of Moreno Valley
C/O City Hall / Clerk's office

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 43

14177 Frederick Street,
Moreno Valley, Ca. 92553

Dear council members,

I'm writting to you today to ask you to please approve World Logistics Center in the City of Moreno Valley the County of Riverside. I've been living in Moreno Valley since 2012 and would appreciate if you can help the community with this project because here it's hard to find jobs in the area close to home most of the jobs are to far away. Please if you can help support this project!


Moreno Valley, Ca. 92551

Thank you,
Soledad Ascencio
Soledad Ascencio

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 22, 2015

15 JUL -7 PM 4: 43

City Council of Moreno Valley
c/o City Hall / Clerks office
14177 Frederick Street,
Moreno Valley, California 92553

Dear Councilmembers;

My name is Eleanor Salas Barajas, I've been living here for 31 years, I have seen it develop into a big city. It was once a great city, however that ended when the government closed it's military base which caused a huge domino effect on the economy. I don't believe it ever recovered. If the World Logistic Center delivers on what they promise to deliver to us; Job opportunities that we desperately need instead of working outside the city, commuting long hours, parents being away from their children, children not being well attended to, which can at times attribute to delinquency of a child. Jobs produced here can help produce income and sprout better and good quality stores and not the junky "made outside of the USA" type of products. The Tax income that will generate out of this venture for the City of Moreno Valley will hopefully beautify our Community, streets, Mall and overall make our city a place to be proud of. This Logistic Center should provide incentives for our teens to give them better options and opportunities to help in their goals and better themselves, to have decent jobs to pay for their college tuitions, buy homes. There are still so many foreclosed homes in this town. It will be great if the people of Moreno Valley gets first pick on those jobs. The young adults graduate and have no hopes of real, good paying jobs, because they are far from being available in this city. Hopefully, this will get addressed through these new jobs that are going to be created.

The only thing I am concerned is the beauty and nature's scenery east of Redlands Blvd that will be disturbed. The "Surrounding Landscape" of this center really needs to be taken into consideration so that it won't look like a sore eye and have a negative impact on the city and people that have to view it from their homes.

Aside from this concern, I support this Venture and I hope to see this city become the city that at some point people actually thought it would become - The next Lake Forest.

Thank you sincerely,

Eleanor Salas Barajas
Eleanor Salas Barajas


Moreno Valley CA 92553

May 7, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:43

Moreno Valley City Council

c/o City Hall / Clerk's office
14177 Frederick Street.
Moreno Valley - California - 92553

Dear Council Members,

I have lived in The City of Moreno Valley for 25 years
I have 5 children.

I am retired.

I personally have not commuted out of the City but my children they all had to go out of Moreno Valley to work because there is no jobs in our city, and this affected their lives because they had to put their lives because they had to put their lives in danger every day on the Freeway, they had to get up very early in the morning and come back home late at night.

This commute is not a way of living, I see my kids suffer leaving their kids behind and only being able to spend a little bit of time with their kids on weekends only.

The WLC project will be a fabulous project because it brings a lot of jobs to our city and to the surrounding areas.

And Moreno Valley will become a well known city for economic growth.

We have to be thankful that someone.

wants and have the desire and the resources to help our city grow and be a great place to live.

The best thing that can happen to our city is to get this project approved immediately so I urge our council members to take immediate action and approved this project.

if approved our city will have the funds to get more public safety, funds for education and all that our city needs to be successful.

Do not delay approved this project now.

Sincerely,

Vilma Restrepo

[REDACTED]
Moreno Valley - California - 92553
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

05/09/15

City Council of Moreno Valley
to city Hall clerk's office
17177 Frederick Street
Moreno Valley, CA 92555

15 JUL -7 PH 4: 46

Dear Council Member Jorge Price

I let you know by this mean that I suport the world logistic Business Center Park, and I Demand you to suport this project as well we need the jobs that this mega project is gona bring to 20,000 people, 20,000 opportunities for our young people new technol. for new generation. our children deserve a better life style.

I sufer the ausence of my husband, commuting every day to Long Beach. my name is Graciela Torres and I want you to vote to give the permits. to the braking ground of this project

Sincerely
x Graciela D. Torres

Moreno Valley, CA 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:46

Mayo 23. 2015

City council of Moreno Valley
c/o city Hall / clerk's Office
14177 Frederick Street,
Moreno Valley California 92553

Queridos Representantes del concilio yo griselda gonzalez quiero a medio de estas letras expresar mi apoyo para el World Logistics Center pues en mi opinion este proyecto seria una gran Ayuda para las personas que vivimos aqui en moreno Valley por que en lo personal mi esposo a tenido que viajar a otros condados para poder sostener la familia pues los trabajos que ay son mas mejores. Pero muy lejos de esta ciudad por lo cual este proyecto beneficiaria tanto a los abitantes o familias como a la ciudad.

Att griselda Gonzalez

[REDACTED] Ave Moreno Valley
Calif. 92551.

por su atencion mil gracias

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 23, 2015

15 JUL -7 PM 4: 46

City Counsel of Moreno Valley
c/o city Hall / clerks office
14177 Frederick Street,
Moreno valley CA. 92553

Dear city Counsel, my name is Griselda Gonzalez and I would like to express my support for the "world logistics Center". In my opinion this project would be of great help to the citizens of Moreno Valley. My husband has had to commute out of the city since we moved here, the jobs pay more but are far from where we live. This project would alleviate some of the unemployment rate and would bring alot of benefits like tax revenue.

Sincerely,

Griselda R. de Lopez

Moreno Valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:45

6/3/2015

City Council of Moreno Valley
c/o City Hall / clerks office
14177 Frederick St. MV CA. 92553

Dear Councilmembers,

I'm writing this letter to advise you of my support for the "world logistic center" this will bring a lot of benefits to this city such as Tax revenue, money for schools and police. etc. It will bring a job foundation for future generations. It will diminish traffic. In conclusion please do your jobs and approve this project (a.s.a.p.) as soon as possible.

Sincerely,

Celia P. Morales

[REDACTED]
MV CA. 92557.

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 45

Junio 3- 2015
City Council of Moreno Valley
% City Hall / Clerk's office
14177 Frederick street.
Moreno Valley. CA. 92553.

Estimados miembros del Consejo.

Estoy escribiendo esta carta para decirle
saber que estoy apoyando este proyecto.
porque se necesita mucha fuente de
trabajo para nuestros jóvenes del futuro
y para ingresos de la Ciudad para
las escuelas una mejor educación.
y para las personas en general no tengan
que estar los freeway's, y nuestro dinero
se quede en Moreno Valley.
en conclusión agan su trabajo y
apoyen este proyecto lo mas pronto
posible

Gracias

Celia Morales

Moreno Valley Ca. 92557

Mayo 20, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:45

City Council of Moreno Valley
40 City Hall/ Clerks Office
14177 Frederick St.
Moreno Valley, Cal. 92553

Yo atentamente Juan Cerda les sugiero que haga para la comunidad de Moreno Valley mejores trabajos en esta ciudad que es muy necesario trabajos cercanos para no manejar tan largas distancias que seria una oportunidad muy buena para los jovenes

Les agradecemos atentamente que aprueben este proyecto y tengamos una ciudad mas prospero.

Mis nietos se tuvieron que ir a buscar nuevos trabajos en otras ciudades

Ustedes estan para apoyarnos a nosotras por favor aprueben el proyecto
The World Logistic Center

Atentamente :



Moreno Valley Cal. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

Mayo 20, 2015

15 JUL -7 PM 4: 44

City Council of Moreno Valley
c/o City Hall / Clerks Office
14177 Frederick St.
Moreno Valley, Cal. 92553

Saludos a la mesa directiva de Concejales,

Quiero pedirles que aprueben el proyecto de World Logistic Center para que haya trabajos en nuestra comunidad.

Tengo muchos años viviendo en Moreno Valley, yo salía a trabajar a los Angeles por muchos años.

En esta ciudad no hubo trabajo para mi ni mis hijos. Tengo 3 hijos 2 están trabajando en los Angeles y uno lo perdí porque Moreno Valley no tenía nada que ofrecer a mi hijo. y tristemente murió en manos de una pandilla.

Por esto les suplico que den oportunidades a las nuevas generaciones y las familias no se dividan

Por eso les pido que den los permisos al proyecto de World Logist Center para q' haya suficientes trabajos para todos

Gracias Emma Cerda

Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUN 6 - 2015

15 JUL -7 PM 4:44

Estimado Concejál

Yo tengo viviendo en Moreno Valley por mas de 20 años y veo la necesidad de mas trabajos en esta ciudad yo tuve 5 hijos que trabajan fuera de la ciudad, por no tener oportunidades aqui

Soy ama de casa retirada pero igual me preocupa las nueva generaciones

yo soy miembro activa de una iglesia cristiana de Moreno Valley.

Soy viuda mi esposo murió hace 12 años pero el estuvo cuando trabajaba a los Angeles por mucho tiempo, y nos dejaba solos por mucho tiempo.

Sr. Concejál creo que THE WORLD LOGISTIC con es una buena oportunidad para darle mas vida a la ciudad de Moreno Valley, y beneficiar a toda la comunidad y al comercio de Moreno Valley, una gran cantidad de dinero vendra a la ciudad para las escuelas y servicios publicos
Gracias por su apoyo

Rosa Garcia

Rosa Garcia

Rosa Garcia

MONERO V. CA

92553

JUNE 3, 20

CITY COUNCIL
MORENO VALLEY
RECEIVED

CITY COUNCIL of Moreno Valley
15 JUL 5 7 PM 6:44
C/O City Hall Clerks Office
14177 FREDERICK STREET
MORENO VALLEY, CALIFORNIA 92553

DEAR COUNCIL MEMBERS;
DEAR GEORGE PRICE - (DISTRICT 3)
I AM WRITING to you to REQUEST that
you CONSIDER GIVING APPROVAL to the
WORLD LOGISTICS CENTER.

WE ENJOY LIVING IN MORENO VALLEY AND HAVE
LIVED HERE SINCE 2004, WHEN WE PURCHASED
IN THE MOUNTAIN VIEW HOMES,

I WANT to believe that you have the BEST
INTERESTS IN THE GROWTH OF MORENO VALLEY

I WAS EMPLOYED IN LAW ENFORCEMENT AND
RECOGNIZE THE NEED FOR STABLE FAMILIES
IN OUR COMMUNITY, IT WAS A PROBLEM FOR
FAMILIES DUE TO THE PARENTS HAVING TO
TRAVEL 2 TO 4 HOURS GETTING TO AND FROM
WORK WHICH LEFT THEIR CHILDREN WITHOUT
SUPERVISION, THIS WOULD USUALLY BRING
THEM INTO CONTACT WITH US DUE TO
THAT LACK OF SUPERVISION,

2

I BELIEVE THE WORLD LOGISTICS CENTER WILL BE ABLE TO PROVIDE JOBS LOCALLY SO THAT THEY WILL BE ABLE TO SPEND MORE TIME WITH THEIR FAMILIES.

I AM 76 YEARS OLD AND RETIRED SO I DO NOT NEED A JOB BUT I KNOW THERE IS MANY IN OUR COMMUNITY WHO DO NEED A JOB.

I BELIEVE THE WORLD LOGISTICS CENTER WILL GENERATE RESOURCES FOR OUR CITY IN THE FORM OF JOBS AND TAXES WHICH WOULD ENABLE THE CITY TO PROVIDE MORE SERVICES SUCH AS POLICE, PARKS AND RECREATION AND OTHER AGENCIES WITHIN THE COMMUNITY.

I BELIEVE OUR NEXT GENERATION OF OUR RESIDENTS NEED THE OPPORTUNITY TO HAVE STABLE JOBS WITHIN THE CITY.

AGAIN, I AM REQUESTING THAT YOU GIVE OBJECTIVE AND HONEST CONSIDERATION TO THIS WORLD LOGISTICS CENTER.

I ALSO BELIEVE AND APPRECIATE THE FACT THAT THIS PROJECT WILL BE DONE

3

BY SOMEONE WHO LIVES AND PAYS TAXES
IN OUR COMMUNITY RATHER THAN SOME
OUTSIDE GROUP COMING IN AND GETTING
WHAT THEY CAN AND THEN MOVING ON
TO SOME PLACE ELSE WITH NO CONCERN
WHAT HAPPENS AFTER THE PROJECT.

Sincerely,

Charles J Seek

CHARLES T. SEEK

[REDACTED]
MORENO VALLEY CA 92553
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -7 PM 4: 44


I am writing today to my fellow council members with great concern I've always had. I'm 26 years old and lived I Moreno Valley for 16 years now. I'm concerned where Moreno Valley is heading towards. I know for any city to flourish or survive jobs are needed in the city so are revenue is going back into the city. The only plan of action that I've seen right now that can actually help is the World Logistics Center project.

Unemployment is too high and its effecting our way of life. The people here are more than wiling to work local jobs. All the jobs I've had over the year exception for one have been outside of Moreno Valley because there aren't any jobs or openings available in this city. The World Logistics Center is the only way to ensure economic growth to this city instead of revenue going elsewhere. Thank you for taking time to read my letter and hope you take this project into consideration.

Sincerely.

Pablo Hermosillo Jr

X Pablo Hermosillo
5/21/2015


Moreno Valley, CA, 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

June 4, 2015

15 JUL -7 PM 4:44

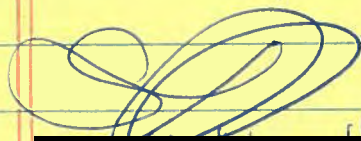
City Council of Moreno Valley
c/o City Hall / clerks office
14177 Frederick St.
Moreno Valley, Ca 92553

Dear Council members

I want to believe that you have the city's best interests in mind. Is the work logistic truly going to bring work to our city and keep in mind that this environment well be in mind as well.

Moreno Valley has no jobs to offer to our residents. The few jobs we do have are low paying. No livable wages.

Sincerely,

 Sonia Lopez

Moreno Valley, Ca 92553

Sonia Lopez

City Council of Moreno Valley
 c/o City Hall/Clerk's Office
 14177 Frederick St
 Moreno Valley, Calif. 92553

CITY COUNCIL
 MORENO VALLEY
 RECEIVED

15 JUL -7 PM 4:47

I'm writing to you today to ask that
 you work to make sure the World Logistics Center
 gets approval here in Moreno Valley.

I'm 67 yrs old and lived in Moreno Valley
 for 31 yrs. I have seen the changes
 in this place. It's sad now days
 that we have so many people & good
 jobs in the city. But we've got
 gangs & crime, no place for people to
 have a good time. We have to go to Riv.
 P. A. Orange County San Bto. to spend our
 money.

We need the money to in the city to
 educate our young people & keep them away
 from gangs & drugs. Parents aren't out
 around it's very hard to keep an eye
 on their kids. Without jobs in the
 city is hard to keep parents. Please
 consider that the project will pass.

Sincerely yours,
 Maria Smith Baragan
 [REDACTED]
 Maria 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:47

June 4, 2015

City Council of Moreno Valley
CPO City Hall / Clerk's Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I am a High School student at Vista Del Lago High School. I am asking for the opportunities of more jobs in our community. Jobs are necessary in our generation. I feel we need more jobs because students need to help support our families.

Sincerely, *Brianna Portillo*
Brianna Portillo
Moreno Valley Resident
[REDACTED]
Moreno Valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:47

June 4, 2015

City Council of Moreno Valley
C/O City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members: My NAME is Misty Mosley AND I THINK that the poverty level in MORENO VALLEY ~~is~~ CAN be RAISED with Adding more warehouses.

Sincerely, *Misty Mosley*, misty mosley
Moreno Valley Resident
[REDACTED]
Moreno Valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:47

MAY 16, 2015

CITY COUNCIL OF MORENO VALLEY
C/O CITY HALL/ CLERK'S OFFICE
14177 FREDERICK STREET
MORENO VALLEY, CALIFORNIA 92553

DEAR COUNCILMEMBERS,

I'M WRITING TO YOU TO EXPRESS MY SUPPORT FOR THE WORLD LOGISTIC CENTER. MY MAIN CONCERN IS PROVIDING JOBS FOR OUR COMMUNITY. SEVERAL STUDIES HAVE SHOWN THAT HIGH UNEMPLOYMENT RESULTS IN HIGHER CRIME RATES. I HAVE BEEN A RESIDENT OF MORENO VALLEY FOR FOUR YEARS, AND I PLAN TO STAY HERE. I WANT TO LIVE IN A PLACE WHERE WE ARE CONSTANTLY DOING WHATEVER WE CAN, TO REDUCE CRIME. LOWER CRIME MEANS SAFER COMMUNITY. I THINK ITS ~~SAFE~~ SAFE TO SAY WE ALL WANT TO LIVE IN A SAFE COMMUNITY. INVESTING IN OUR INFRASTRUCTURE IS SOMETHING I'M ALSO IN FAVOR OF. THE W.L.C. WILL GENERATE REVENUE FOR THE CITY, THAT CAN BE USED TO FIX OUR INFRASTRUCTURE. CREATING JOBS CLOSER TO HOME WILL ALLOW PARENTS TO SPEND MORE TIME WITH THEIR KIDS, WHICH WILL RESULT IN MORE PRODUCTIVE MEMBERS OF SOCIETY. FOCUSING OF THE FAMILY STRUCTURE WILL STRENGTHEN OUR COMMUNITY. REDUCING COMMUTE TIMES, BY CREATING JOBS CLOSE TO HOME WILL

ALLOW PARENT TO FOCUS ON THEIR FAMILY. REDUCING CRIME, CREATING ECONOMIC GROWTH AND CREATING A BETTER COMMUNITY, WILL MAKE OUR CITY A PLACE WHERE PEOPLE WILL WANT TO LIVE AND DO BUSINESS WITH. MAKING OUR CITY INTO A PLACE WHERE OUTSIDER WANT TO DO BUSINESS WITH WILL RESULT IN MORE BUSINESS, MORE ECONOMIC GROWTH, AND A BETTER OVERALL COMMUNITY. THUS I ASK THAT YOU PLEASE SUPPORT THE WORLD LOGISTIC CENTER; AND MAKE OUR CITY THE BEST PLACE TO LIVE.

SINCERELY

Manuel Macias

MORENO VALLEY RESIDENT


MORENO VALLEY CA 92557.

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 46

May 13, 2015

City Council OF MORENO Valley
c/o City Hall / Clerk's Office
14177 FREDERICK STREET
MORENO Valley, CA 92553

Dear Council members:

I bought my house in 1991 and I used to commute since 1991 all the way to Santa Ana and Temecula and when I was laid off I have been able to find a job in the city of Moreno Valley, up until today I am still unemployed, I have been looking and I haven't found anything, I have a good record, I have a good citizen, I pay my taxes, I have a big family and we need the City Council to have the courage to do what's right for the community.

I strongly support the World Logistic Center that will be able to provide the jobs that are needed in the city.

City Council Do not be afraid to take a stand and do what is right for our communities.

As we voted for you you have a moral obligation to take action on behalf of our community

Sincerely,

RUBEN PEREZ

Moreno Valley, CA 92551



CITY COUNCIL
MORENO VALLEY
RECEIVED

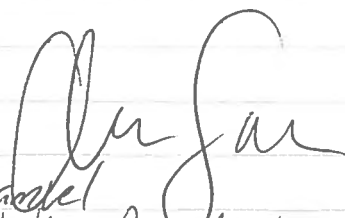
15 JUL -7 PM 4:46

June 3, 2015

City Council of Moreno Valley
CPO City Hall / Clerks Office
14177 Frederick st.
Moreno Valley CA 92553

Dear Council members, I honestly feel the CITY COUNCIL CAN DO BETTER WITH THE JOBS PAY RATES AND MORE JOB OPENINGS. SO FAR I SEE NO IMPROVEMENT. WE NEED THE LOGISTICS CENTER!

Sincerely,



Allen Sabel
Moreno Valley Resident
[REDACTED]
Moreno Valley CA 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED
MAY 16th
15 JUL - 7 PM 4:46

City Council of MORENO Valley
C/O City HALL/ Clerk's office
14177 FREDERICK ST. MORENO VALLEY CA
92553.

IM WRITING TO YOU TO DAY TO ASK THAT YOU. TO APPROVE
WORLD LOGISTIC CT.

I LOVE MORENO VALLEY AND WANT TO SEE THE FUTURE
OF THIS CITY & PEOPLE THRIVE.

THIS PROJECT WILL BRING ALOT OF JOB'S.

THIS PROJECT WILL BRING HUGE REVENUE TO KEEP
OUR CITY AFLOAT.

WE HAVE 3 THOUSAND STUDENTS GRADUATING EVERY YEAR
WITH NO JOB'S FOR THEM HERE IN M.V.

THE THOUSAND'S OF PEOPLE THAT MUST COMMUTE
TO AND FROM WORK CAN NOT SPEND MUCH NEEDED
TIME WITH FAMILY. & ALSO DO NOT HAVE TIME TO BE
INVOLVED IN THE CITY & SCHOOLS.

THE BOTTOM LINE IS THE THE BENIFIT'S ARE TO
GREAT TO PASS UP. THINK ABOUT THE PEOPLE OF
THIS CITY AND THIRE FUTURE. YOUR'S TRULY
Robert Salomarez

MORENO VALLEY. CA, 92557.

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUNE 2, 2015

CITY COUNCIL OF MORENO VALLEY
C/O CITY HALL / CLERKS OFFICE
14177 FREDERICK ST.
MORENO VALLEY, CA. 92553

15 JUL -7 PM 4:46

DEAR COUNCIL MEMBERS:


I'M WRITING TO YOU TO EXPRESS MY SUPPORT FOR "THE WORLD LOGISTICS CENTER PROJECT". I SUPPORT THIS PROJECT BECAUSE I BELIEVE IT WILL BRING JOBS AND ECONOMIC OPPORTUNITY TO OUR CITY, WHICH IS VERY IMPORTANT TO THE COMMUNITY. THE PROJECT ALSO DIRECTLY RESPONDS TO THE CITY'S ADOPTED "ECONOMIC DEVELOPMENT ACTION PLAN" WHICH I ALSO SUPPORT.

THE "WORLD LOGISTIC CENTER WOULD BE A HUGE STEP TO BETTER THE COMMUNITY WE HAVE MISSED THIS OPPORTUNITY IN MORENO VALLEY, PLEASE DON'T LET THIS OPPORTUNITY GET AWAY FROM US.

Sincerely,



Danny T. Workman


MORENO VALLEY, CA. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:49

June 11, 2015

City Council of Moreno Valley
 CPG City Hall / Clerks Office
 14177 Frederick St.
 Moreno Valley CA 92553


Dear Council members:

The world Logistics center is amazing. There are mostly pros rather than cons. The cons are rare and don't cause harm to us. I want jobs here and they have to pay more than min. wage.

Develop the WLC now, so we can benefit as a city! I'm for the WLC 100%.

Sincerely,

[Signature]
 Ana Valle
 Moreno Valley Resident


 Moreno Valley CA 92553

Junio 06 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:49

City Council Of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street,
Moreno Valley, California 92553.

Es importante que apoyemos este proyecto. motivo por el cual obtendremos muchas mejoras a Moreno Valley, aumento de empleo, y mejorar la economía, Disminucion de violencia, robos, asaltos.

Francisco Beltran.

[REDACTED]
Moreno Valley Ca 92551.
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:49

June 9, 2015

City Council of Moreno Valley
70 City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA, 92553

Dear Councilmembers,

I have lived in Moreno Valley for 29 years. I have two children who have lived in Moreno Valley all of their lives. I work in the retail business in Riverside, CA. I have worked there for the past 18 years. I attend Church here in Moreno Valley.

I would like to ask you to approve the World Logistics Center project. It would bring jobs to Moreno Valley and would help boost the economy in our city. I have watched this city grow with all the houses, but what good is that if our citizens have to commute to other cities for work.

I would hope that you as Councilmembers you also have the city's best interest in mind. The entire community would benefit from the World Logistics Center project to make our city a better place to live. I know several young people (my daughter included) who have been looking for a job and have not been able to find them.

We need this project to get your approval

and pass the permits to get this project under way. We need to build this city up we don't want to be like other surrounding cities ~~that~~ that are dealing with ~~financial~~ money troubles.

We need to look to the future not only for us but for the next generation this will also help other local business in the area. We need to build more jobs to help out the economy. Please pass The World Logistics Center project.

Thanking you in advance for your support

Sincerely,
Elisa Peikert
Moreno Valley Resident

moreno Valley, Ct. 92553

Elisa Peikert

Mayo 31 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:48

City Council Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street.
Moreno Valley California 92553

Dear councilmembers;

Mi nombre es Consuelo Ortiz y me gustaría que world logistic center estuviera aquí ya tengo poco tiempo viviendo, un año pero me doy cuenta de la necesidad de que haya mas oportunidad de trabajo para personas que tienen necesidad de tener un ingreso, o mas oportunidades para nuestros hijos.

Sincerely

Consuelo Ortiz, Consuelo Ortiz

Moreno Valley, [REDACTED] M.V. 92553

06/06/15

City Council of Moreno Valley
 c/o City Hall / Clerk's Office

CITY COUNCIL
 MORENO VALLEY
 RECEIVED

14177 Frederick Street, 15 JUL -7 PM 4:48

Moreno Valley California 92553

Yo Ignacio Pantoja e vivido en Moreno Valley por 22 años y evisto crecer esta ciudad pero si necesitamos mas fuentes de trabajo tengo dos hijos y quisiera que hubiera mas ingresos mas trabajos my ocupacion asido de ensamblador motor Home pero pues todo eso bajado no ay mucho trabajo my actividad en la comunidad es deportiva con mys hijos e trabajado fuera de la ciudad por 10 años porque lamentable mente no ay trabajo en esta ciudad y pues te afecta salir a trabajar fuera por el tiempo pierde uno mucho tiempo en la carretera que puede aprovechar en otras cosas como estar con la familia y yo apoyo a todo a quel proyecto que nos traiga fuentes de trabajo que quiera invertir aqui en nuestra ciudad y adelante y si podemos alludar con nuestra firma adelante cuentan con mi go

Ignacio Pantoja

[REDACTED] Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 48

June 4, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick st.
Moreno Valley CA 92553

Dear Council members:

I dislike moreno valley due to the fact
that there is no jobs open to alot
of people around here. Bring more
jobs please!

Sincerely,

Ericka Ortega
Ericka Ortega
Moreno Valley Resident

Moreno Valley CA 92551

may 23, 2015

Francisco Serrano
2543 Old Quarry Rd #
San Diego, CA 92108

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:47

CITY COUNCIL of Moreno Valley.
C/O CITY HALL / CLERK'S OFFICE
14177 Frederick Street.
Moreno valley CA, 92553.

Dear Councilmembers,

my name is Francisco Serrano,

I currently live in San Diego, CA, but I was a resident of Moreno Valley for 15 years before that. My wife and I both commuted for years outside the city because there wasn't any job opportunity. We have two daughters that currently live in Moreno Valley, and we would like a different future for them, I hope we can see that in the near future. Our family supports the World Logistics Center Project because it will create a lot of opportunity for people in Moreno Valley. Hopefully putting the city on the map, like San Diego, a beautiful city that has tons of job opportunity and businesses that are thriving, and a city with an economic base. We hope you make the right choice for the City of Moreno Valley. Thank You.

Francisco Serrano
Francisco Serrano

CITY COUNCIL
MORENO VALLEY
RECEIVED

5/28/2015

15 JUL -7 PM 4: 49

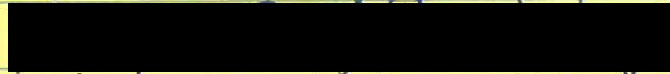
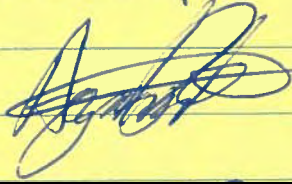
City Council of Moreno Valley
c/o city Hall / clerks office
14177 Frederick Street

Dear Councilmembers.

My name is Agustin Pedroza and I have been a resident of Moreno Valley since January 2011, I spent almost 3 years commuting for approx 3 hrs to and from work. The stress of driving daily for 7 days per week was excruciating. I'm writing this letter to advise you of my support of "the world logistics center" This project would bring numerous benefits to the city, the community, and the overall wellfare of the city.

Please do your jobs and approve this immediately. Moreno Valley has been waiting for this opportunity for along time, this is a project that will benefit more than affect the city.

Sincerely,



Moreno Valley, Ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED


15 JUL -7 PM 4:50 6-18-15

To

City Council of Moreno Valley, CA
CM city Hall / ~~city~~ office
14177 Frederick st.
Moreno Valley CA 92553

Mi nombre es Alessandra Mendez y yo apoyo este proyecto. Yo creo que este proyecto puede ayudar a muchos, especialmente a las escuelas. Las escuelas necesitan mas dinero para programas. Unos programas se estan cerrando porq. no ay dinero como musica y arte.

Alessandra Mendez


Moreno Valley CA
92557

Jackie Reed

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:50

June 14, 2015

Moreno Valley Ca 92551

Dear City Council of Moreno Valley,

My name is Jackie Reed and I have lived in Moreno Valley for 15 yrs. I have three kids and 4 grandchildren 3 of whom live here in Moreno Valley as well. I am a manager and have had to commute to work since I moved here even after switching jobs. There are not many opportunities here for work or to start a career. This has resulted in me not being able to spend time with my family as I have to work 10 to 12 hours per day with an hour commute each way. My kids were "latch key" kids.

I am excited for the World Logistics Center because it would provide my kids an opportunity to work in the community they live and allow them more times to spend with my grandchildren, time I wasn't able to spend with my own kids. This will allow my grandchildren an opportunity to bond with their parents and will also benefit their education as well. I am excited to support the future of Moreno Valley.

Sincerely, Jackie Reed

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 50

Yo Rosa Baltazar

estoy solicitando a ustedes que permitan la aprobación de la construcción del World Logistic Center en Moreno Valle porque en realidad se necesitan trabajos y poner más escuelas y así tengamos más recursos y abra más dinero para nuestra comunidad de ante mano se los agradeceré que no se haga caso omiso de nuestras peticiones que en realidad se necesita.

Rosa Ma Baltazar

[REDACTED]
[REDACTED]
Riverside CA, 92508

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 50

May -15-2015

City Council of MORENO VALLEY
c/o City Hall / CLERK'S OFFICE
14177 FREDERICK STREET,
MORENO VALLEY, CALIFORNIA 92553

Dear Councilmembers;

IM WRITING TO SUPPORT THE LOGISTICS
CENTER PROJECT. I SUPPORT THIS PROJECT
BECAUSE I BELIEVE THAT BRINGING JOBS
TO OUR CITY IS IMPORTANT. I AM A LOCAL
WORKER AND MANY OTHERS WOULD LIKE THE SAME
OTHER THAN TRAVELING A LONG DISTANCE FOR A JOB.

Sincerely,

JOSE JASSO A MORENO VALLEY RESIDENT
SINCE 1992 @ [REDACTED]
MORENO VALLEY CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:49

June 4, 2015

City Council of Moreno Valley
CPO City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I would love more job opportunities so we have less homeless people. It would be helpful for a lot of people who are currently struggling right now.

Sincerely, ~~Kailynn Blanchard~~
Kailynn Blanchard
Moreno Valley Resident
[REDACTED]
Moreno Valley CA 92551

CITY-COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 49

June 9, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

Moreno valley has no jobs and
this city has to stop being
trash. Also it'd be greatly
appreciated if Moreno valley
had cleaner places.

Sincerely, ~~Gerardo Ortega~~
Gerardo Ortega
Moreno Valley Resident
[REDACTED]
Moreno Valley CA 92551

May 15, 2015

City Council of Moreno Valley
C/O City Hall/Clerk's office
14177 Frederick Street,
Moreno Valley, Ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 49

Dear Council members, I am 14. I'm writing to you guys to ask if you can please approve World Logistic Center in the city of Moreno Valley the county of Riverside. It would be really nice to have our parents work closer, and have the future be nice, other than seeing people struggling. I'm sure if you guys approve the community will be nicer and easier to find jobs. Please if you can help support this project it would be a blessing. Thank You!

Thank You
Casandra J

[REDACTED]
Moreno Valley, Ca. 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:49

May 16, 2015

City Council of Moreno Valley
 1630 City Hall / book office
 14177 Frederick Street
 Moreno Valley ca. 92553

Dear Councilmembers;

I'm writing to you to express my support for projects coming in to Moreno Valley. I have lived in Moreno Valley for 25 years raised two children. My husband and I have commuted to LA for 11 years due to lack of opportunities. It was not beneficial for our children.

Now to how the jobs are coming into city makes me so happy knowing that taxes, revenues will be available to beautify our city. I may not be able to see it but our grand children will do!

I think this project will bring a lot benefits to the community

Sincerely,

Yvonne Isabel Ramirez

Moreno Valley ca 92551.

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 16, 2015

15 JUL -7 PM 4: 49

City council of moreno valley
c/o city hall / clerk's office
14177 Frederick street
moreno valley, California 92553

Dear council members, I am a 12 year old girl and I wish to be a photographer when I get older. Even though I am only 12, still young, I support the World logistics center project. It will open doors for me and be easier for others also. In less than 6 or 7 years I can be able to participate with the project. I know we will succeed with this project as long as we all do our part and support this idea. Honestly, I don't know why people are against this amazing project! It will provide 20,000 jobs and help so many people. This is so generous and ~~it~~ is not asking for a penny! This will help everyone who is willing to get a good job in life. Like me.

Sincerely, Dafne Martin

moreno valley, CA
92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:49

05/28/2015

City Council of Moreno Valley
c/o City Hall/Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Dear councilmembers;

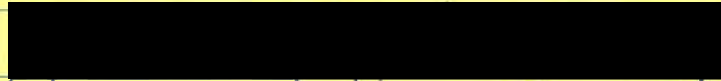
Soy Agustín Pedrosa y llegue a vivir aquí en Moreno Valley en enero 01/2011, y dure mas de dos años manejando cerca de 3hrs para llegar a mi trabajo en Brea, esto hera 7 dias por semana, en realidad es un dolor de cabeza lidiar con el trafico y los accidentes que se presentan en el camino y estoy 100% de acuerdo en apoyar el proyecto de World Logistics Center.

Este proyecto nos traera impuestos para la Ciudad de Moreno Valley, nuevas empleos e ingresos para los habitantes de Moreno Valley, en realidad la economia en nuestra ciudad sera mucho mejor. Por favor hagan su trabajo por que Moreno Valley nesecita ver cambios positivos es obvio que este proyecto nos alludara mas positivimante que

negativamente.

Sinceramente;

Agustin Pedroza



Moreno Valley, Ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 51

June 6, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street
Moreno Valley CA 92553

Dear Council members:

Hi my name is Cassandra Gonzalez, and I've been living in Moreno Valley for more than 10 yrs. And I believe that the World Logistics Center would benefit me, my family, and also my community. I currently work out of the city, and I would love to have the opportunity to work closer to my home and city, where I can be closer to my family. I believe the World Logistics is a great project for me. I would like this project the World Logistics Center come to reality, please give the approval in favor of this project. Thank you.

Sincerely,
Cassandra Gonzalez

[REDACTED]
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 51 6-06-15

CITY COUNCIL OF MORENO VALLEY
c/o City Hall / Clerk's Office
14177 Frederick Street, Moreno Valley 92553

queridos conasegales

Mi nombre es ROSA yo soy LA unica que
trabajo beo GRAN necesidad que se
abran trabajos en la ciudad de
Moreno Valley. EL Proyecto de WORLD
LOGISTICS CENTER Ayudara A LOS
~~A~~ JOVENES A que esten Empiando
Y viviremos mejor EN NUESTRA
CIUDAD con LOS PERMISOS PARA LA
que ~~CE~~ CONSTRUYA EL Proyecto
GRACIAS

ROSA MORALES D GARCIA

Moreno Valley California 92554

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -7 PM 4:50

June 4, 2015

City Council of Moreno Valley
CPO City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members^o

I want Moreno Valley to have more jobs for teens. I feel like it is hard to get a job while being under age. That all and hope world logistic center works out great.

Sincerely, 

Edwin Castellon

Moreno Valley Resident


Moreno Valley CA 92551

Junio 4, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 50

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick St.
Moreno Valley, Ca 92553

Querido Council miembros

Porque no quieren apoyar este proyecto?
Yo creo que este proyecto va a traer
nuevos trabajos a esta ciudad. Esta ciudad
necesita trabajos, trabajos de buena paga
en la que se pueda una mantener. Y yo
creo que este proyecto va a ayudar a
Moreno Valley. El World Logistic Center va a ayudar
a la ciudad. Den los permisos

Sinceramente

Jesus Nunez

Moreno Valley, Ca 92553

Diana E Thompson

6 June 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:50

Moreno
Valley CA
92551To: City Council of Moreno Valley
City Hall / Clerk's Office
14177 Fredrick Street-

Moreno Valley, CA 92553

Dear Council Member

PROJECT:

World Logistics
Center

Community is asking for more jobs

Community is requesting the
approval of the world logistics
centerCommunity is requesting an eco
friendly project

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 50

May 15, 2015

City Council of Moreno Valley
 c/o City Hall/Clerk's Office
 14177 Frederick Street,
 Moreno Valley, CA. 92553

Dear council members,

I'm a 16 years old. I really hope for you to approve world Logistics Center in the proud city of Moreno Valley. I've been living in Moreno Valley ever since I was a little baby. I would really enjoy the city of Moreno Valley to be a great revolutionary place and hopefully you will consider ~~my~~ our very economy. I have seen the project myself and I would enjoy for us to have a very great community. please consider this letter to be a key to a great future.

Sincerely,

~~Ulysses Jasso~~

Ulysses Jasso A Moreno Valley resident
 since 1999 @ [REDACTED]

Moreno Valley CA. 92551.

June 19, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 52

City planning Commission
90 City Hall/Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Planning Commission
My name is Jesus Cervantes, I have been living in Moreno Valley for 23 years. I moved to this city from Norwalk, CA because my job moved to Miraloma, it was not a long commute, but I see a lot of my friends and family commuting to very distant cities, they spend hours in traffic instead of spending time with their family, this need to change. I support this project of World Logistic Center because it will create jobs for Moreno Valley resident and it will give us an opportunity to achieve a better life.

Sincerely,

Jesus Cervantes Garcia
[REDACTED]
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-25-2015

15 JUL -7 PM 4: 52

City council of moreno valley
c/o city Hall/clerk's office
14177 Frederick st.
moreno valley calif. 92553

Mi nombre es Jose Antonio Garcia, y tengo 10 años viviendo aqui en Moreno valley y trabajando en orange county por 6 años y es un trabajo muy difícil para mi y mi familia porque trabajo lejos y no tengo tiempo para ellos, y ademas pasando tanto tiempo en el Kru con tanto trafico mi salud se empeoró y necesito mucho encontrar trabajo aqui en M.V. pero no hay, por eso yo apoyo 100% este proyecto de World Logistics center y confio en que ustedes como miembros del concilio van a aprobar este proyecto, muchas gracias por su atención

José A. Garcia

moreno valley calif. 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 52

June 4 2015

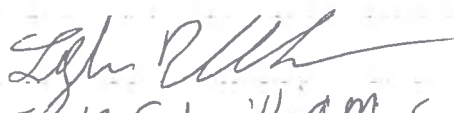
City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553


~~XXXXXXXXXXXXXXXXXXXX~~

Dear Council Members:

I am a hard working man, who takes care of my household. I am struggling with the three jobs that I have now. I know that if I find the perfect job that pays the pay of these three jobs, that way I can have more time for my family, that I'm working so hard for. Please approve the development of this project so that I can begin to look for employment.

P.S. ~~Moreno Valley~~ Moreno Valley needs this now!
 I Need this now!

Sincerely, 
 Tyler William San
 Moreno Valley Resident


 Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:52

JUNE 3, 2015

Jeffrey J. Giba, City Council of Moreno Valley
40 City Hall / Clerk Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Mr. Giba:

My name is Charles Van Zee. I have been doing business in Moreno Valley since 1990. I have experienced the ups and downs of this great city. It goes without saying we need jobs and something significant to boost the economy of this city. I firmly believe that the World Logistics Center will bring about what has been lacking in Moreno Valley. I fully support this project and I ask your utmost attention and support to make this project a reality.

Sincerely

Charles Van Zee, 


Moreno Valley, CA 92557
 

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 52

June 22, 2015
Planning Commission
% City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Planning Commission,
I am writing this letter to express my strong support to the World Logistics Center. We really have so much work here to do in Moreno Valley to bring more jobs to our city and this is the best way to do it. Those of us who have lived in this town for a long time know how important this is. The World Logistics Center project is the best thing to come before our community in over 30 years. This is your chance to set a standard that it will benefit our city, and is a great chance for us as community to have access to thousand of jobs. Please support the WLC!!

Sincerely,
Julissa Wence

[REDACTED]
Moreno Valley, CA 92557.

Julence

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 52

Mary Ann E. Lerma [REDACTED]
Moreno Valley, CA 92553
[REDACTED]
[REDACTED]

3 June 2015

City Council of Moreno Valley
c/o City Hall/Clerk's office
14177 Frederick Street
Moreno Valley, California

I have been a resident of Moreno Valley since 1988, I am writing in support of the World Logistic Center project because our city desperately needs a variety of job opportunities in our area. For those who argue the jobs this project will bring are low paying jobs my response is this; we have hundreds of kids graduating high school every year who need entry level positions to learn job skills, develop a work ethic, and learn to appreciate the feeling of earning funds through their own efforts. Also many people including myself want a job, an opportunity for a new start after long periods of unemployment.

In all the time I've lived here commuting has been necessary in order to have a full time job. Currently I drive 42 miles round trip to my job in a real estate development office.

My five children all moved out of the area in order to secure employment. When my children were minors the time away from home was very challenging and I am sure young parents now are enduring the same difficulties time away from children meant to me. Last year my grandson moved out of the area for the same reason lack of job opportunity in the area.

The opportunities for employment, tax revenues, and potential improvements to our city from additional revenue would be wonderful. The family time added to parents no longer commuting would increase safety for children and perhaps lower juvenile problems in the area.

Some people complain about the pollution but you have several warehouse and distribution centers less than a mile from city hall and much closer to local residents than the World Logistic Center would be.

As a longtime resident of this community I offer my full support to this project.

Thank you for taking the time to read my letter, I can be reached at [REDACTED] if you would like to contact me.

Sincerely,



Mary Ann Lerma

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 51


June 4, 2015

City Council of Moreno Valley
CPG City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

We want more jobs to increase our income. Moreno Valley will change as soon as these new jobs come because it will ~~be~~ change how people treat the city and each other. I hope that you sincerely think about helping the citizens of Moreno Valley and its future generations.

Sincerely,


Moreno Valley Resident
[REDACTED]
Moreno Valley CA 92553

Alejandra Cassias

CITY COUNCIL
MORENO VALLEY
RECEIVED

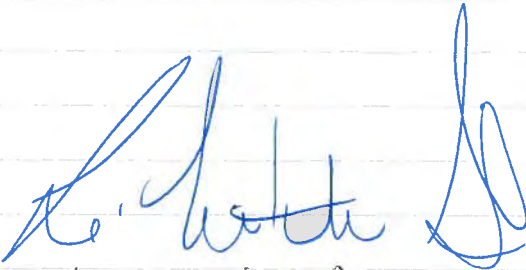

15 JUL -7 PM 4: 51

June 4, 2015

City Council of Moreno Valley
CPC City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

It would be more beneficial if more developments were built to supply Moreno Valley residents to better opportunities for employment.

Sincerely,  Leitha Gray,
Moreno Valley Resident

Moreno Valley CA 92551

5/11/15

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:51

May 11, 2015
 City Council of Moreno Valley
 c/o City Hall / Clerk's office
 14177 Frederick Street
 Moreno Valley, California 92553

Dear Councilmembers,
 I am writing to you to say I have lived in Moreno Valley for 13 years, have no children and am not very active in the community. I currently work at the Fresh & Easy warehouse in Riverside.

I have worked various jobs in Riverside since 2012. I have been affected driving at there because there is traffic most of the time, and am more prone to accidents. I believe the world logistic center will benefit the city, and its inhabitants by creating more employments.

Sincerely,
 Lorena Garcia
 Moreno Valley Resident
 [REDACTED]
 Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 51 5/12/15

City Council of Moreno Valley
c/o City Hall /clerks office
14177 Fredrick street
Moreno Valley, California 92553

Dear Councilmember;

Im adressing to you today to ask that you work to make sure the World Logistics Center gets approval here in moreno valley, because the entire community will benefit in one way or another from the project. I am 21 years old and I have lived in Moreno Valley for 16 years. I know that Moreno valley needs a boost; to spark that boost we need buisness and we need jobs. This project will bring a ton of jobs to the area for all sorts of people.

Sincerely,

Jose U. Mariscal

Jose U. Mariscal Gutierrez

Moreno Valley
Ca, 92553.

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 51

05/12/15

city council of Moreno Valley
% city hall / clerk's office
14177 Frederick street,
Moreno Valley, California 92553

Dear Councilmembers;

Trough this letter I am expressing my support to the World Logistic Center Business Park, because the economy of Moreno Valley will flourish we need an economy boost in all angles that you can see it, for our school, for parks, streets light police protection. We need Jobs in our city

The majority of Moreno Valley people goes out of the city to work, commuting every day countless hrs. I with all do respect Demand you to support this project. for the sake of the future generation.

Sincerely

x Manuela Gutierrez
Manuela Gutierrez

Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED


15 JUL -7 PM 4: 51

5/12/15

CITY OF MORENO VALLEY
c/o CITY HALL (Clerks office)
14177 FREDERICK ST.
MORENO VALLEY CA 92553

I HAVE BEEN LIVING IN MORENO VALLEY FOR ABOUT 19 YEAR BUT BEEN DOING BUSINESS IN MORENO VALLEY FOR ABOUT 22 YEARS. I SUPPORT THE WORLD LOGISTIC CENTER BECAUSE IN MY CASE I OWN A BUSINESS IN MORENO VALLEY AND I THINK THAT BY CREATING MORE JOBS IT WILL HELP ME GROW MY BUSINESS SINCE SMALL BUSINESSES LIKE MINE DEPEND ON PEOPLE WORKING IN TOWN.

I JUST THINK WE SHOULD NOT LET THIS OPPORTUNITY GO PLEASE HELP APPROVE THIS PROJECT

ALFONSO GORDON



 MORENO VALLEY CA 92553

City Council of Moreno Valley
c/o City Hall/Clerks Office
14177 Frederick St
Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

5/26/2015
15 JUL -7 PM 4: 51

My name is Gema Garcia, and I believe the World Logistics Center project will only benefit our poor, sad community. When I grow up, I wouldn't want to live in a place like Moreno Valley, is today. This project will encourage me to stay here. Moreno Valley has some of the worst schools, and I'd like to change that. I want to be able to find a job, to pay for college, when I grow older. This project will improve how other cities look at the sad city of Moreno Valley. Our city is a joke to others, our schools have horrible teachers. The school system is rigged, I am an A student, but it's difficult to deal with teachers, who don't do their job. It's difficult as a young adult not to have amusement in a city or any activities. There is nothing fun or exciting to do in this city. I hope this project is passed for the better of our community's lives. Thank you for your time and consideration. Have a nice day.

Sincerely
Gema Garcia

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 20, 2015 7 PM 4: 51

City Council of Moreno Valley
c/o City Hall/clerk's office
14177 Fredenck street, Moreno Valley, CA 92553

Dear Councilmembers;

My name is Rosa Mariscal
I'm married and have 3 children
I have lived in moreno valley for
Seven years. I have been supporting
the World Logistics Project since
I heard about it. I am on board
with this project because I agree
with it's purpose. I currently work
in Riverside. I have been driving
to work for 7 years. It is very
stressful having to drive in traffic
going to work and coming from work
everyday. If this project is approved
I believe great opportunities such
as jobs for my children and the
children of the residents of Moreno
Valley.

We as a family ask that this
matter be given your immediate
attention.

Sincerely,
R. Min

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:51

June 6, 2015

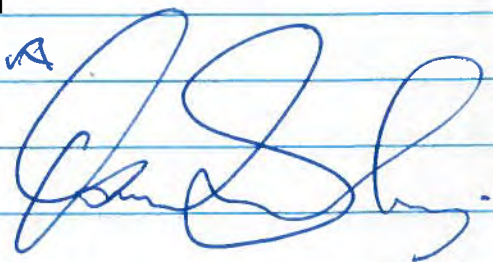
City Council of Moreno Valley
c/o City Hall/Clerks Office
4177 Frederick Street,
Moreno Valley CA 92553

Dear Council Members;

Hi my name Oscar Gonzalez. I have lived in Moreno Valley most of my life. I've attended schools here and have graduated in the Moreno Valley school district. I am in support of the World Logistics Center project. I believe that this would be a great project to benefit this city. This project would help us progress and help families in the cities with jobs. Thank you for taking your time to read this and can't wait to hear the approval of this great project.

Sincerely,
Oscar Gonzalez

Moreno Valley CA
92553



CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 54


June 2, 2015

City Council of Moreno Valley
 CPG City Hall / Clerks Office
 14177 Frederick St.
 Moreno Valley CA 92553

Dear Council members:

Hello my name is Michael and I am for the World Logistics center. I think this building will help families of all races and denominations. I want to work in logistics when I get older. I am studying computers and terminology now, so that I will be mentally and physically ready when it is my time to enter the work force. Please approve the blueprints of the World Logistics center. We as a city need this change as soon as possible. Again we can all benefit from the Logistics Center, especially the City of Moreno Valley's Revenue. Thank you for taking time to read my letter.

Sincerely,



Michael Negrete
 Moreno Valley Resident

Moreno Valley CA 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

June 1, 2015

15 JUL -7 PM 4: 54

City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553

Dear Council Members:

Hello my name is Melissa, and I am in support of the World Logistics Center. I completely am one hundred percent ready for this logistics center to be developed. This development will allow Moreno Valley to economically rise higher than other cities. The tax revenue that would be generated from the W.L.C. (World Logistics Center) could be used to help benefit our city. Especially our school districts and police departments. The majority of the cities funds are used on things that will not regenerate income. Please invest in our future as a city and allow us to soar high without limits. I know this city can and will be great. We changed our Council members, now its time for us to change our city completely for the best only. Again please approve this development of the World Logistics Center.

Sincerely, ~~Melissa Sosa~~
 Melissa Sosa
 Moreno Valley Resident

Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PH 4: 53

Moreno Valley, Ca.

Junio 01 de 2015

City Council de Moreno Valley
C/O City Hall/ Clerk Office
14177 Frederick St.
Moreno Valley, Ca. 92553

Estimado Sr. Jesse Molina:

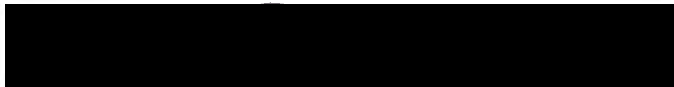
Por medio de la presente me dirijo a usted para pedirle que necesitamos su apoyo para el proyecto World Logistics Center, ya que nos urge tener Fuentes de trabajo dentro de la ciudad de Moreno Valley, CA.

Esperamos recibir una respuesta afirmativa para el proyecto sin mas.

Sinceramente,

Maria Reyes

Maria Reyes



Moreno Valley, Ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

Junio 1, 2015

15 JUL -7 PM 4: 53

City Council of Moreno Valley
to City Hall / Clerk's Office
14177 Frederick St.
Moreno Valley CA 92553

Señores miembros del concilio:

Saludos, me dirijo a ustedes con respeto.
Tengo 14 años en la ciudad. y ahora
estoy desempleado porque no hay trabajos

Den los permisos para que el proyecto the
World Logistics Center se construya para
que haya trabajos para nuestros hijos y nietos
Estoy muy pobre y necesito trabajo y que
paguen bien. Ayuden al pueblo
a que prospere y así abra dinero para
la ciudad

Gracias FIDELIO

[REDACTED]
Moreno Valley CA 92553
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 53

May 30th, 2015

c/o City Hall / Clerks office

14177 Frederick Street,


Moreno Valley, California 92553

Dear Councilmember's;

what makes the the world logistics center so good is the opportunity is now and the future of moreno valley is one step closer to being a bad place to live with high taxes to pay lets get the money in the city so i can go back home

Sincerely,

Benny McNair


riverside, ca 92503



CITY COUNCIL
MORENO VALLEY
RECEIVED
April 30, 2015
15 JUL -7 PM 4: 53

City Council of Moreno Valley
40 City Hall / Clerk's office
14177 Frederick St.
Moreno Valley, Ca. 92553

Dear Council members
Alicia Barber would like
for you to please approve the
World Logistics Center Business
Park to give the people
of Moreno Valley more work
opportunities and taxes for
the city that the police and
fire departments could really
use.

Sincerely
Alicia Barber
Moreno Valley Resident
for 25 years.
92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

6-1-15

City Council of Moreno Valley
City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, ca. 92553

15 JUL -7 PM 4: 53

Querida. Tardes. mi nombre es
Susana Navarro dirijo esta carta
para usted. para que den los
permisos para los trabajos.
necesitamos muchos. Trabajos
aquí para un buen futuro para
nuestros hijos. y nietos.
por favor. Les pido que aprueben
Este proyecto. ~~Wood~~. bca hugo.
Traeria muchos Trabajos
aquí en Moreno Valley.
por favor aprueben. este proyecto.

Atenta mente.
Susana Navarro

moreno valley ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 53

June 2, 2015

City Council of Moreno Valley
100 City Hall/Clerk's Office
14177 Frederick St.
Moreno Valley Ca 92553

Dear Council Members:

As a member of my home's association I understand how voting and thinking on behalf of others. As a elected committee, I ask may you please think of the residents when making decisions regarding the World Logistics Center. Without this project, Moreno Valley will not last long ^{nor} sufficiently when it comes to self sustainability. We will need the tax revenue that will be generated from the World Logistics Center. I want this project developed as soon as possible. Thank you for taking the time to read our letters.

Sincerely, Loba Davids

Loba Davids
Moreno Valley Resident

Moreno Valley Ca 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 53

June 2, 2015

City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553

Dear Council Members: Hi my name is Darla, and I love Moreno Valley. I am born and raised here and have seen progress, but I know we can do better. My goal is to help the progression of Moreno Valley by support the World Logistics Center and spreading the news of how the WLC can make us benefit significantly.

I had to leave my hometown due to a lack of jobs in Moravia. Once there are more opportunities for me out there I will definitely return home and find a job so I can support my family.

Sincerely, Darla Andrews

Moreno Valley Resident

Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PH 4: 53


June 2, 2015


City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553

Dear Council Members:

Thank you for ~~the~~ taking the time to read my letter in support of the World Logistics Center. This center will provide new and better opportunities. This will benefit Moreno Valley as a whole and individually with their families. Again please approve this project so that we may start rebuilding.

I want this project developed now!

Sincerely, 
 Elmer Willanson
 Moreno Valley Resident


 Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 53
City Council of Moreno Valley
c/o city Hall/ clerk's office
14177 Frederick st.
Moreno valley CA. 92553

Estoy escribiendo esta carta a ustedes como miembros para que apoyen este proyecto de world logistics center yo tengo viviendo aqui 28 años y amo mucho esta ciudad de Moreno Valley y quiero verla progresar, y con este proyecto va a mejorar la ciudad, por favor NO dejen que esta oportunidad se nos valla de las manos apoyenla, Gracias por su atencion.

José Lopez

[Redacted address line]

[Redacted address line]

92551
Moreno Valley CA.
92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 53

June 2, 2015

City Council of Moreno Valley
10 City Hall / Clerk's Office
14177 Frederick St.
Moreno Valley Ca 92553

Dear Council Members:

Due to traffic and all of my commuting problems I have chosen to work from home. This way I can spend time with my kids and make a little side income.

This working from home is rewarding but not financially. I would love to enter the workforce close to home, so that I may help support my growing family.

With the building of the World Logistics Center I will be able to work closer to home and make money while still receiving quality time with my family after work. Thank you for taking the time to read my letter.

Sincerely, ~~Karen Muniz~~
Karen Muniz
Moreno Valley Resident

Moreno Valley Ca 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 52

June 1, 2015

City Council of Moreno Valley
C/O City Hall/Clerk's office
14177 Frederick St.
Moreno Valley Ca 92553

Dear Councilmembers:

Hello as a young man in Moreno Valley I am growing up around C/Os. I'm trying to survive and I keep applying for jobs but I am unable to get jobs. There is tough competition already for the scarce jobs that we have already. If the World Logistics Center is completed, there will be more opportunities, since there is more jobs less competition will make it easier to get employment.

Sincerely, Cesar Sosa
Cesar Sosa
Moreno Valley Resident
[REDACTED]
Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-21-15

15 JUL -7 PM 4: 52

City Council of Moreno Valley
 c/o City Hall / Clerk's office
 14177 Frederick Street,
 Moreno Valley California 92553

Honorable councilmembers:

I want to express my gratitude to you to have the time to read my thoughts and concerns.

I'm a mother of 2 children. I've been living in the city of Moreno Valley for 20 years. I love my city and I would like to approve the permits for the World Logistic Center because will benefit the entire community bringing many thousands of dollars to the city and the project will bring many jobs to the residents of Moreno Valley.

It's had been hard to see my husband commuting for about 4 hours my children are growing without his father I strongly believe that this project will bring economic stability and social in our city.

Please let our city advance and make it a better place to live.

Marna Conzely

Moreno Valley Ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-25-2015

15 JUL -7 PM 4: 52

City Council of Moreno Valley
c/o City Hall Jewell's Office
14197 Frederick St.
Moreno Valley Calif. 92553

Dear Council Members,

My name is Daiana Maiore and I live in Moreno Valley. I am a single mom of an 11 yr old boy. I have been unemployed for over 2 yrs and have had a hard time finding a job. When I heard about the World Logistics Center Project, I got very excited cause it meant more jobs. I would hate to have to uproot my son again if jobs are not available soon in our Community of Moreno Valley. I ask you to please give this project a chance, it will benefit so much, or you will see many people moving from here. We love our home and would be terrible if we had to move. Thank you
Daiana Maiore.

CITY COUNCIL
MORENO VALLEY
RECEIVED

Mayo 27, 2015

15 JUL -7 PH 4: 55

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street

Saludos con respeto,

Mi familia vive toda en Moreno Valley, yo me moví porque no había trabajo en esta ciudad.

Es muy difícil vivir en esta ciudad cuando no te ofrece nada. Me movi a la ciudad de Riverside y aun así viajó mucho para trabajar.

Sería de gran cambio a la ciudad si ustedes dieran los permisos para dar la oportunidad a el proyecto World Logistic Center y que se beneficien muchas para que crezca la ciudad y no este pobre y no haya pandillas, gente ^{no use} drogas.

Se ocupan mas trabajos que carceles
Den los permisos Ya!
Gracias

Rever side CA
Alejandro GARCIA
Auntie

MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 55

JUN 3-2015

City council of moreno valley
c/o city Hall/clerk's office
moreno valley ca. 92553

Mi nombre es ISSIS y yo apollo
World logistics center. estaria muy agradecida
que este proyecto fuera una realidad
para miles de familias que tienen
que salir fuera por mas de una hora
de distancia a sus respectivos trabajos
y de estar de regreso ~~en~~ 4 horas en
el trafico es demaciado cansado y
extresante.

Atentamente : ISSIS Bojorquez

[REDACTED]
moreno valley ca. 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

Yo to - city council of Moreno Valley
Margarita Valdivia 15 JUL -7 PM 4:55

estoy escribiendo para solicitarles que permitan
la aprobacion de la contruccion del
World Logistic Center
porque necesitamos mas trabajos en Moreno Valley
y dinero para las escuelas

Margarita Valdivia



Moreno Valley CA. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 31, 2015

15 JUL -7 PM 4: 54

City Council of Moreno Valley
c/o city Hall/clerk's office
14177 Frederick street,
Moreno Valley, CA 92553

Dear council members,

I support this project; it will be very beneficial for all the residents of the city of Moreno Valley. This city has potential to grow, but we need something like this project to help bring jobs within our city. This is for the future of our sons, daughters, nephews, nieces, grandchildren, and so forth. "World Logistics Center" in Moreno Valley is a beneficial project.

Sincerely,

Janeth Cruz

Moreno Valley Resident

Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 54

May 30th, 2015

c/o City Hall / Clerks office

14177 Frederick Street,

Moreno Valley, California 92553

Dear Councilmembers;

My names is Patricia Pfefer, I have lived in Moreno Valley for many years. I believe the World Logistic Center is a great opportunity for Moreno Valley and the generations to come. Everything that the World Logistic Center project is bringing is exactly what we need in our city. I think it's time for our city to make a change and do this by approving The World Logistics Center project. The project will bring 20,000 job opportunities that we need here, and more money in tax revenue to make our city progress. With this opportunity for money to benefit the city we can have better facilities in Moreno Valley.

Many residents go and commute out of the city for work. I don't believe my city should be prevented from this great project and all the benefits it will bring. I ask for your support in approving this project. Please be a part of making this city a better place. Thank you for your time.

Sincerely,

Patricia Pfefer

██████████
Moreno Valley CA, 92557



CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 54

June 3, 2015

City Council of Moreno Valley
CPC City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members

Hi my name is Serenity. I am 6 or 7 years
old. I want a job when I get
older. I want to be a big girl
that works with computers in your
town.

☺ ☺

Sincerely,

Serenity Thompson
Moreno Valley Resident

Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

DEAR Council members

15 JUL 27 PM 4:54

JUNE 4, 201

My name is Dannon Wads,
 AND I Am IN full support of the
 continued construction of The World
 Logistics Center project. I have been
 A Moreno Valley resident for 32 years
 now AND have held 5 jobs IN this
 time, 4 out of the 5 jobs I have
 had to commute to Riverside or
 further, with only 1 fast food job
 being here in town. I am aware that
 with the construction of the World
 Logistics Center approximately 20,000
 new jobs will be added to Moreno
 Valley AND that's not counting the
 13,000 or so construction jobs that
 will be fulfilled over the period
 of 15 years to build the project.
 AND then, there's all of the tax-
 revenues that will go to the city
 of Moreno Valley AND the state.
 With tax-revenues being allocated
 to our police, firefighters, parks
 etc. this IS A win-win situation,
 AND not to mention the addition
 of all the new jobs for Moreno
 Valley residents AND others. I Am

A third generation wants in this town. AND I wish to see my children have the option of living here AND working here. So, please honor the requests being made so that the continued construction of this project can happen.

Sincerely yours,
Damon Jones
Monro Valley
Resident: [REDACTED]

[REDACTED]
Monro Valley, CA
92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 54

Moreno Valley, Ca.

Junio 01 de 2015

City Council de Moreno Valley
C/O City Hall/ Clerk Office
14177 Frederick St.
Moreno Valley, Ca. 92553

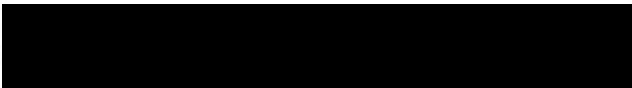
Estimado Sr. Jesse Molina:

Por medio de la presente me dirijo a usted para pedirle que necesitamos su apoyo para el proyecto World Logistics Center, ya que nos urge tener Fuentes de trabajo dentro de la ciudad de Moreno Valley, CA.

Esperamos recibir una respuesta afirmativa para el proyecto sin mas.

Sinceramente,

Jose Carlos Reyes Singh
Jose Carlos Reyes Singh



Moreno Valley, Ca-92553

CITY COUNCIL
MORENO VALLEY
RECEIVED


15 JUL -7 PM 4: 54


June 2, 2015

City Council of Moreno Valley
100 City Hall/Clerk's Office
14177 Frederick St.
Moreno Valley Ca 92553

Dear Council Members:

My name is Elmer Williamson and I am a father of a 5 year old girl. She looks up to me and everything that I do. She wants toys and clothes, and as my only child I try to give her what she wants and needs. I really want the World Logistics Center to hurry and be developed, so that I can apply for work and make life easier for me and my daughter. Thank you for your approval of the World Logistics Center.

Sincerely, 
Elmer Williamson
Moreno Valley Resident


Moreno Valley Ca 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 54

June 1, 2015

City Council of Moreno Valley
CPO City Hall / Clerk's office
19177 Frederick St.
Moreno Valley Ca 92553

Dear Councilmembers:

Hi my name is David, and I am a elementary school going into middle school. I want to be an engineer when I grow up and make lots and lots of money. The World Logistics center will give jobs to Moreno Valley that pay very good. When I get a job there I can take care of my mom and my dad, also my little brothers and sisters.

Please build this, my family and I really want and need the World Logistics Center.

Sincerely, David Sosa
David Sosa
Moreno Valley Resident

[REDACTED]
Moreno Valley Ca 92553

A.1.z

Packet Pg. 971

90 City Hall/Clerk's Office
14177 Frederick St
Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

To the Moreno Valley city council
15 JUL -7 PM 4:54

I Am writing today as a concerned citizen living in the city of Moreno Valley. I am an avid supporter of the World Logistics Center proposal for many reasons, some of which are; financial stability in the region, support of our schools and personal career growth.

Please support the making of the World logistics Center.

Sincerely,
Soel Utterbach
Moreno Valley Resident



Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 55

June 1, 2015

City Council of Moreno Valley
c/o City Hall / Clerks Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Councilmembers:

I am a resident of Moreno Valley for the last 10 years, I am blessed to have a local job but unfortunately my husband has to commute to LA to work. He spends one hour and a half to get to work and one hour to two hours to come home, he comes home late at night and I am so tired of the this I don't get to spend time with my husband.

I have seen the presentation of the World Logistics Center project and I agree that this is the right thing for our city. I believe that our city needs the jobs that this project will bring to our city.

Councilmembers please do your best to approve this project we the community of Moreno Valley need it.

Sincerely,

Angelina Saucedo

Angelica Saucedo

Moreno Valley, Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:55

June 13, 2015

City Council of Moreno Valley
CPC City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I'm a UDLHS Senior
and I'm graduating today. Once
I graduate I will be considered
an adult. And I would like to
work and go to school in Moreno
Valley to help my family.

Sincerely, Juan Alegria

Moreno Valley Resident
[REDACTED]

Moreno Valley CA 92551

Juan Alegria

CITY COUNCIL
MORENO VALLEY
RECEIVED

June 2, 2015

15 JUL -7 PM 4: 55

City Council of Moreno Valley
 c/o City Hall / Clerk's office
 14177 Frederick St.
 Moreno Valley, CA 92553

Dear Councilmember,

I Tray Adam Plotkin am a Director of Logistics. I drive 4 hours a day, is hard to see my family. I been leaving in Moreno Valley for 10 years. We need more jobs for everybody that leavis in Moreno Valley I will be so happy to only drive 30 minute to work. I would like for you to approve the World Logistics Center project for the future generation.

Thank You
 Tray Plotkin

Moreno Valley CA 92551
 951-567-4713

CITY COUNCIL
MORENO VALLEY
RECEIVED

June 2, 2015

15 JUL -7 PM 4:55

City Council of Moreno Valley
% City Hall/Clerk's Office
14177 Frederick Street,
Moreno Valley, CA 92553

Dear Councilmembers :

I'm student of Moreno Valley Community College . I heard about the project of World Logistic Center and I'm very excited about this project . I strongly believe that this project will change our city . This project will help people like me to have a job on a carrier.

Please help us to have a better Moreno Valley and people don't have to commute and will bring more money to the city

Sincerely,
Becky Fryer (Becky Figueroa)

[REDACTED]
Moreno Valley CA 92551
[REDACTED]

Moreno Valley, Ca.

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 55

Junio 01 de 2015

City Council de Moreno Valley
C/O City Hall/ Clerk Office
14177 Frederick St.
Moreno Valley, Ca. 92553

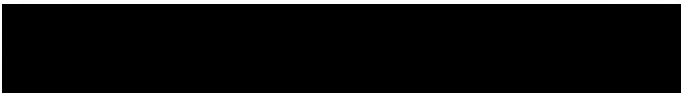
Estimado Sr. Jesse Molina:

Por medio de la presente me dirijo a usted para pedirle que necesitamos su apoyo para el proyecto World Logistics Center, ya que nos urge tener Fuentes de trabajo dentro de la ciudad de Moreno Valley, CA.

Esperamos recibir una respuesta afirmativa para el proyecto sin mas.

Sinceramente,

Dedra Reyes
Dedra Reyes



Moreno Valley, Ca. 92553

CITY OF MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 55

City Council of Moreno valley
c/o City Hall / Clerks office
14177 Frederick Street,
Moreno Valley, California 92553

Dear Councilmembers

I'm writing to you to Express my support for The World Logistics Center project. I've been a moreno valley Resident for 10yrs and i would like to see change in the city. This project will proved many jobs for the residents. The World Logistics Center project will bring millions on tax revenue. There will bring change to the streets, of moreno valley, and schools better future for my family. Local jobs so people dont have to commute from town to town.

Please Approve This project.

Sincerely, Juan Munguia

Moreno valley Resident

[REDACTED]
Moreno valley CA, 92553

Juan Munguia

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:55

June 1, 2015

City Council of Moreno Valley
C/O City Hall / Clerk's Office
14177 Frederickst
Moreno Valley Ca 92553

Dear Council members:

Thank you for taking the time to read my letter. I am in middle school and I can't wait to get older and get a great job. I want to take care of my mom and dad the way they always take care of me.

Please build the World Logistics Center, so my parents can get good jobs, and I can get a great job when I'm older. Thank you.

P.S. I'm getting ready to head into high school so I only have a couple years left till I am able to work at the World Logistics Center.

Sincerely, Jesus Castaneda
Jesus Castaneda
Moreno Valley Resident

Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 55

5-25-2015

City Council of Moreno Valley
c/o City Hall/Clerk Office
14177 Frederick St. Moreno Valley CA,
92553

Dear Councilmembers

mi nombre es Linda Nunez y tengo 7 años
viviendo aqui en Moreno Valley, me gusta
mucho esta ciudad pero el crimen a
aumentado mucho y estoy muy preocupada
porque quien despide a mas policia
porque no tiene dinero la ciudad para
pagar, y si podera que yo y mi familia
apoyamos a World Logistics Center
porque va a beneficiar mucho esta
ciudad con todos los nuevos trabajos
y poder pagar a mas policia para que
nos cuide y podamos vivir mas tranquilos
le agradece mucho su atencion
y apoyo a este proyecto de
World Logistics Center

Linda Nunez

Moreno Valley ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:57

Junio 1, 2015

City Council of Moreno Valley
To City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, Cal. 92553

Atencion a los Consejales :

Señores del consejo quiero decirles que tengo 14 años en Moreno Valley. Esta ciudad está muy pobre y hay mucha delincuencia. Mis hijos no fueron a la Universidad porque no había dinero para sus estudios.

Es bueno que el proyecto The World Logistics Center venga a la ciudad para que los jóvenes tengan trabajos y haya dinero en la ciudad para pagar mejores servicios. Den los permisos que para eso los pusimos a ustedes para que prospere la ciudad.

Traciya MARIA SANTA CRUZ

[REDACTED]
Moreno Valley CA 92553
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

5/30/15
City Council of Moreno Valley
90 City Hall/Clerk's office
14177 Frederick Street,
Moreno Valley, CA 92553

Dear Council members:
I agree with a project like
World Logistic Center to be approved,
I am a lucky resident of Moreno
Valley that doesn't have to drive
to my work everyday but I really
think this project is a good
investing in the future generation.
This project will benefit most
of us, Moreno Valley resident.

Sincerely,

Miguel Diaz

[REDACTED]
Moreno Valley Ca
92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:56

June 1, 2015


City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553


Dear Council Members:

Hello fellow council members. I am a father but I am also a Man. A man must provide and take care of their families. I as a man must provide the necessities that my children need on a day to day basis.

Also as a man and husband I have to provide my wife with the things she will need. These things all cost money, but the job I currently have, I am unable to support my family the way they deserve. Please approve the W.L.C. (World Logistics Center) so that I may find opportunities that will help me take care of my family.

Sincerely,


 Milton Negrete
 Moreno Valley Resident


 Moreno Valley Ca 9255

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 56

June 6th, 2015

~~I have lived in~~
City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

I have lived in Moreno Valley for 13 years. Yes, I am active in the community. I play soccer.

My dad has been commuted for 10 years driving to Irvine for work. This affects my life because I wanna spend more time with my dad. Yes, sometimes my dad has to work and can't be with us. I think that this project would be helpful with all the technology and the money being contributed to the Education and work forces. This project would benefit the community in a variety of ways. It would help it by the 20,000 jobs and less commutes so families can spend more time with your families together. The tax revenue ~~will~~ will also benefit by the tax revenue by cutting taxes in our community. It will also help in the education.

Sincerely
Jose Manuel Lopez
Moreno Valley Resident

██████████ Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 56

6-6-15

My NAME IS CHRIS KNOWLES AND I
HAVE LIVED IN MORENO VALLEY FOR 3
YEARS. I RUN A TRAVEL BALL SPORTS
TEAM HERE IN MORENO VALLEY CALLED
YETI WATERPOLO. I TEACH KIDS AGES 5-18
ABOUT THE WONDERFUL SPORT OF WATER POLO.
MY FULL PURPOSE IS TO GET ALL MY
ATHLETES TO COLLEGE.

I WORK IN MORENO VALLEY AND
MY PARENTS HAVE TO COMMUTE TO
WORK EVERYDAY. THIS MAKES IT HARD
TO ALLOW THE PARENTS TO SUPPORT
THEIR CHILDREN'S EXTRACURRICULAR ACTIVITIES.
A SIMPLE PHILOSOPHY IS THAT IT TAKES
A VILLAGE TO RAISE A CHILD AND WE
NEED ALL THE PARENT SUPPORT AS
POSSIBLE. THE LOGISTICS CENTER WILL
HELP PARENTS BE MORE INVOLVED WITH
THEIR CHILDREN IF THEY DO NOT HAVE
TO COMMUTE TO WORK EVERY DAY. THE
SCHOOLS CAN ONLY THRIVE WITH MORE
PARENT SUPPORT. COMMUNITY AND FINANCIAL
SUPPORT WILL COME FROM THE LOGISTICS
CENTER AS WELL

SINCERELY,

CHRIS KNOWLES
MORENO VALLEY RESIDENT

92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 56

June 11, 2015

City Council of Moreno Valley
CPC City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I'm a Senior at U.D.L.A.S.
and I want a job after I graduate
The World Logistics Center will provide
that and more. Thank You.

Sincerely,

Robert Z.
Moreno Valley Resident

Moreno Valley CA 92553

Robert Zimora
Robert Zimora

6-4-15

CITY COUNCIL
MORENO VALLEY
RECEIVED

City Council of Moreno Vall

15 JUL -7 PM 4: 56

to city hall / clerks Office

A quien correspondo:

14777 Frederick Street

Moreno Valley California 92553

El motivo de esta carta es para declarar mi apoyo al proyecto del World Logistic Center porque me gustaria que se abrieran mas empleos para que la ciudad tuviera mas presupuesto para que se realizaran mas actividades para la comunidad y principalmente para los niños y jovenes. Yo tengo 3 hijos y cuando trato de que tomen clases o que practiquen algun deporte son muy caros y ademas no puedo pagar porque no hay trabajos disponibles aca en Moreno Valley. Por eso yo apoyo el trabajo proyecto de World Logistic Center, y les pido porfavor que aprueben el proyecto y que aprueben los permisos.

Atte.

Maria del Carmen Carlos


 Moreno Valley Ca, 92553


CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 56

COMMUTING IN MORENO VALLEY

DATE 5/29/15

City Council of Moreno Valley
 c/o City Hall/ Clerks Office
 14177 Frederick Street
 Moreno Valley, Ca. 92553

Dear Council Members

I support the World Logistics Center because I am in high favor of creating more jobs in Moreno Valley. The unemployment rate for Moreno Valley is fairly high and I believe it's time to change that. We have yet to create a mass amount of jobs for our city, but this project would help us do that tremendously. Creating more jobs has always been a positive move and it will only have positive benefits.

Sincerely,
 Valerie Mendoza
 Valerie Mendoza

Moreno Valley, CA 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

06-01-15

15 JUL -7 PM 4: 56
City council of Moreno Valley
% City Hall / clerk's office
14177 Frederick Street,
Moreno Valley, CA 92553


Dear Councilmembers:

My name is Suhail Virginia Luna
and I'm 10 years old I am
writing to you all to pass
the necessary permits for
the world logistics center
project both of my parents
work in ~~orange~~ orange
country I do not have
the quality time that I
deserve that's why we
need to create more
jobs in Moreno Valley

Sincerely,

Suhail Virginia Luna

Suhail ~~Virginia~~ 

 Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

JUNIO 6, 2015

15 JUL -7 PM 4: 56

CITY COUNCIL OF MORENO VALLEY

C/O CITY HALL/CLERK'S OFFICE

14177 Frederick Street,

MORENO VALLEY, CA 92553

Soy residente de Moreno Valley desde 1994

Mi esposo trabaja fuera de la ciudad desde el 1994 desde que nos movimos a esta ciudad

Nos encanta la ciudad de Moreno Valley

pero mi esposo sufre mucho de estar trabajando fuera de la ciudad y yo tambien por no tener a mi esposo cerca tener pendiente

que le pase algo en el camino y tambien no paso tiempo con nosotros. esta muy cansado de tantos años de manejar y el trafico horrible que hay en las carreteras.

Yo apoyo el Centro de Logística mundial por que es un gran proyecto ya que va haber muchos trabajos que son necesarios para nuestra comunidad y muchas personas dejarían de manejar fuera.

Por favor consejales de Moreno Valley escuchen el clamado de la comunidad

y digan si al proyecto

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

June 19, 2015

City Council of Moreno Valley
C/O City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Planning Commission:

My name is Burt W. Ashens and I have lived in Moreno Valley for approximately 10 years and I have more than 40 years of experience in the Industrial Marketing field. I submit this letter as a supportive approval for the Highland Fairview World Logistics Center proposal with the following justifying points of interest.

1. The two World Logistics Center promotional brochures that I have received not only reflect professional, but exceptional "marketing knowledge" something that Moreno Valley has been short of.
2. Emphasis on providing jobs and career opportunities.
3. Major increase in property value, combined with lower upgrading expenses.
4. It will result in a community with more relaxed life attitudes.
5. More business competition and more customer service aptitude.
6. An opportunity to have a fully staffed city hall facility.

After Mr. Iddo Benzeevi's talk at the June 11, 2015 City Planning Commission meeting, he solidified the impressions of purpose, dedication, and a vision of how to!

Moreno Valley should feel blessed for this man's dreams and actions toward accomplishments.

Sincerely,



Burt W. Ashens

Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

6-18-15

to

city council of moreno valley CA
c/o city hall clerks office
14177 frederick st
Moreno Valley CA, 92553

My name is Israel Mendez
and I support this project. I believe
that this project can help a lot
of people ~~that are~~ ^{that are} trying to get jobs.
I also believe that this can help
school get more money and more
money = more books, programs, and computers
or chromebooks.

Israel Mendez

Moreno Valley, CA
92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-25-2015

15 JUL -7 PM 4: 57

CITY COUNCIL OF MORENO VALLEY
C-0 CITY HALL CLERK OFFICE
14177 FREDERICK ST. MORENO VALLEY CA. 92553

Hi my name is JOE FERNANDEZ
I BEEN LIVING IN M.V. FOR 11 YEARS I HAVE
3 KIDS. I WORK IN LOS ANGELES. FINDING A
JOB IN MORENO VALLEY IS GOOD I WANT TO GO
TO SCHOOL UNDER THE V.A. TO LEARN A TRADE.
THE WORLD LOGISTICS. WOULD BE A GOOD PLACE TO
WORK

THIS PROJECT WILL BRING A TON OF JOBS
FOR ALL SORTS OF PEOPLE

I AM WRITING TO YOU TODAY TO ASK ~~YOU~~ THAT
YOU WORK TO MAKE SURE THE WORLD LOGISTICS
CENTER GETS APPROVAL IN MORENO VALLEY.

GRASIAS - Joe Fernandez

[REDACTED]
Moreno Valley CA 92553

MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

May 30th, 2015

c/o City Hall / Clerks office

14177 Frederick Street,

Moreno Valley, California 92553

Dear Councilmembers;

My names is Amy Ledefma, I have lived in Moreno Valley for many years. I'm writing you to express my support for the World Logistic Center project. I want to believe that you have this area's best interest in mind, so I ask for your support of this logistics project. Everything that the World Logistic Center project is bringing is exactly what we need in our city. I think it's time for our city to make a change and do this by approving The World Logistics Center project. The project will bring 20,000 job opportunities that we need here, and more money in tax revenue to make our city progress. With this opportunity for money to benefit the city we can have better facilities in Moreno Valley.

The entire community will benefit in one way or another from the project. I would like to ask you to approve this project, so we can start benefitting as soon as possible. Thank you for your time

Sincerely,

Amy Ledfma


Moreno Valley CA, 92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

May 30th, 2015

c/o City Hall / Clerks office

14177 Frederick Street,


Moreno Valley, California 92553

Dear Councilmember's;

20,000 jobs millions in tax revenue to the city every year what makes the world logistics a bad idea i still can't see why it's taking so long to help the city makes a person wonder if you're in office for the title and the paycheck maybe recalls are a good idea get someone in office that can make a difference not another couch potato keeping themselves on a seat bleeding there city dry and taxing them for everything they got

Sincerely,

Charlene McNair


riverside, ca 92503



CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

June 19, 2015

City Council of Moreno Valley
C/O City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Councilmembers:

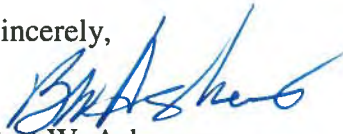
My name is Burt W. Ashens and I have lived in Moreno Valley for approximately 10 years and I have more than 40 years of experience in the Industrial Marketing field. I submit this letter as a supportive approval for the Highland Fairview World Logistics Center proposal with the following justifying points of interest.

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2. Emphasis on providing jobs and career opportunities.
3. Major increase in property value, combined with lower upgrading expenses.
4. It will result in a community with more relaxed life attitudes.
5. More business competition and more customer service aptitude.
6. An opportunity to have a fully staffed city hall facility.

After Mr. Iddo Benzeevi's talk at the June 11, 2015 City Planning Commission meeting, he solidified the impressions of purpose, dedication, and a vision of how to!

Moreno Valley should feel blessed for this man's dreams and actions toward accomplishments.

Sincerely,



Burt W. Ashens

Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

May 27 2015

Dear City Counsel of Moreno Valley
c/o City Hall / clerks office
14177 Frederick Street
Moreno Valley CA. 92553

Dear Counselmembers,

My name is Ricardo Esteban I've been a resident of morano valley 11 years. I lost my home to the recession due to the loss of income also. I fully support the "World Logistics Center" Because it would bring alot of revenue along with jobs that we need.

We don't need more or higher taxes in morano valley. Please do your jobs and approve this project so that you can allow us the citizens some tax relief.

Sincerely,

Ricardo ESTEBAN


Moreno valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

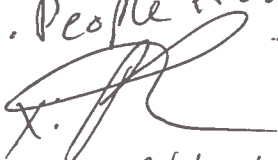
Planning Commission of Moreno Valley
 C/O City Hall / Clerk's office
 14177 Frederick St.
 Moreno Valley Ca 92553

Dear Planning Commission:

I am a Resident of Moreno Valley
 and I want change! The WLC brings
 change. Is there a way we can

~~potential~~ petition the Districts and
 elect NEW members with NEW Improved

Ideas to help Moreno Valley? We need a change
 now! There should be new members in any and
 all offices. People from '92 should no longer be on the

Sincerely, X.  there's time for a change on
 staff, especially in the
 school district.

Mildred Bailey

Moreno Valley Resident


 Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

06/09/15

Dear Council Members i belive its beneficial
to have new jobs for family and for the Homeless.
I really support World Logistics
Center.

I think it is a good thing that its helping
Parks and schools in buildings

Sincerely *[Signature]*



CITY COUNCIL
MORENO VALLEY
RECEIVED

CITY COUNCIL OF MORENO VALLEY 15 JUL -7 PM 4: 57
c/o city Hall/ clerk's office
14177 Frederick st.
Moreno valley CA. 92553

Mi nombre es Socorro Lopez, yo apoyo este proyecto de World Logistics center. Creo que no vamos a tener otra oportunidad como este por favor apoyen este proyecto. La Ciudad necesita mas vigilancia de policia y no ay dinero para pagar a mas policia y con este proyecto todo va a mejorar en la ciudad. Gracias

Socorro LOPAZ

[REDACTED]
[REDACTED]
MORENO VALLEY CA. 92551

MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

June 2, 2015

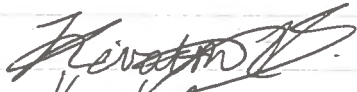
City Council of Moreno Valley
CPC City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:


Hello Council members, I am a 17 year old young man getting ready to head to college. As I approach my eighteenth birthday, I was recently told that I beat the statistics of not being shot. My mom raised me out here in the valley so that I can have a better environment. Living out here has taught me to become an independent young man who takes care of my mom.

When I graduate college I will have a masters in Logistics, so that I have a higher stepping stone up than some of the other candidates. My mother always told me I can do anything and I know I will get a great logistics job and take care of her and the family.

Sincerely,


Kevante Browne

Moreno Valley Resident


Moreno Valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 58

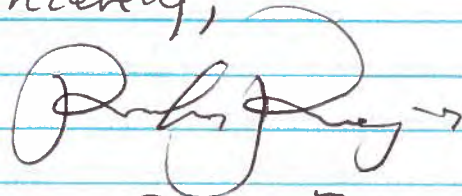
5/27/15

City Council of Moreno Valley
90 city Hall / Clark's office
14177 Frederick Street
Moreno Valley, CA 92553

Dear council member,

I am writing this letter to show my support of the World Logistic center in Moreno Valley. I believe this could be a great opportunity for both the city & citizens within it.

Sincerely,



Ruby Reyes

[Redacted]
Moreno Valley, CA
92557

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 27, 2015

15 JUL -7 PM 4: 58

City Council of Moreno Valley
c/o City Hall/ Clerk's Office
1477 Frederick Street.
Moreno Valley, CA 92553

Dear city council:

I want to express my support to the World Logistic Center, I truly believe that will benefit our city and will give us a chance to have more jobs. I also believe that the tax Revenue that will generate to the city it will help to relief our broke economic system. I am tired to commute with a lot of traffic every morning to the point that I rather to leave two hours earlier just to avoid the traffic. Give the Moreno Valley residents the opportunity to better our lifes.

Sincerely,

Eudoro Wuence

Moreno Valley, CA 92553

Eudoro Wuence

RECEIVED

15 JUL -7 PM 4: 57

City Council of Moreno Valley. 1 JUNIO 2015
 40 City Hall / clorfi. s office.

14177 Frederick Street.

Moreno Valley California 92553

buenas tardes Señores. Como estas.
 dirigo esta Carta. Ustedes con mucho
 respeto. Para pedirles Que Por favor
 Dejen entrar esta Compañia. the World.
 a Moreno Valley. California. Logistics.
 necesitamos mucho trabajo
 Para esta Ciudad Para. Nuestros.
 hijos tener Que Salir Fuera.
 De aqui

Sabon que mi hijo Sale Fuera.
 mucho y deja sola su familia.
 Porque aque no ha trabajos
 Por favor acepten. acepten. esta.
 propuesta Para vivir mejor con
 nuestra. familia.
 solo agradeceremos mucho.
 gracias por su atencion

Atte

Celestina. Macias Marti

Moreno Valley Cal. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 57

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Dear Councilmembers;

I'm writing to you to express my support for The World Logistics Center project. I've been living in Moreno Valley for many years now as an adult it would be nice to see more job opportunities in our community. The World Logistics Center Project will better the community and a better future for the families in Moreno Valley.

Sincerely,

Jazmine Padilla

Moreno Valley Resident

Moreno Valley CA 92553

Jazmine Padilla

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 58

Junio 1, 2015

City Council of Moreno Valley
 % City Hall / Clerk's Office
 14177 Frederick St
 Moreno Valley, CA 92553

Estimados miembros del Consejo,

Por favor acepten las propuestas que se les
 estan pidiendo para que aigan trabajos aqui

Este proyecto The World Logistics Center
 traeria miles de trabajos a la ciudad
 y la gente ya no saldria afuera a trabajar
 a otras ciudades.

Ayudenos porque muchos estamos viviendo
 por falta de trabajos porque se van a
 otras ciudades

Atentamente,
 Rufino Moreno S

[REDACTED]
 MORENO VALLEY CA 92553
 [REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 58

June 2, 2015

City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553

Dear Council Members:

Hello councilmen and women, I am writing in regards to you all about the World Logistics Center. I have spoke with both sides of the project and have made/concluded my own decision. I am in agreement with the development of more career and job opportunities. This project will generate more revenue and make Moreno Valley as a whole better.

I can not wait to apply for any open positions that I meet the requirements. Starting now I can I prepare myself for those classes needed to meet the requirements for the logistics positions.

Sincerely, ~~Briana J. Patricia~~
 Briana J. Patricia
 Moreno Valley Resident

Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 58

May 30th, 2015

c/o City Hall / Clerks office

14177 Frederick Street,


Moreno Valley, California 92553

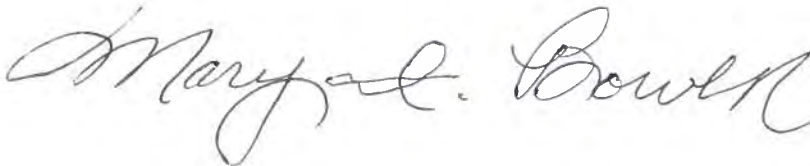
Dear Councilmember's;

The world logistics center looks like a project with many opportunities bringing this project to moreno valley would help change allot of lives for the better. a project of this magnitude shouldn't be looked pass so easily, Jobs can affect the outcome of a city for the better and if there is a opening for a brighter future it's best to grab a hold and make it possible before it slips i know that you'll make the right choice and make a home for the world logistics center and the future residents of moreno valley

Sincerely,

Mary Bowen


riverside, ca 92503



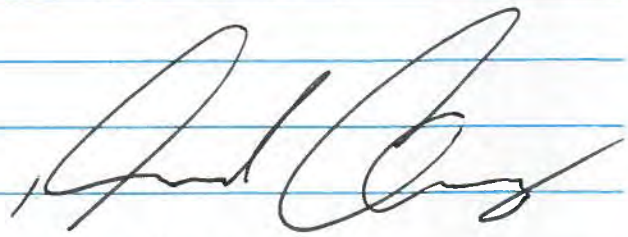
CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 58

June 17th

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, CA. 92553

Dear Council members I have lived in moreno valley for about 13 years. I have commuted for 6 years and it sucks I want this project to get approved cause we need more jobs here and we need change for our city. The World Logistics Center project is key for our city it will change peoples live and in a good way also our future children need this, this is for them. The World logistic center will benefit the community. More jobs for us, less commuters and it will rise our tax revenue, help our schools, businesses, and us. Just get this project approved already we the people need this thank you.

Sincerely, Jessel Chavez 

 Moreno Valley
CA. 92553


CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 58
City Council of Moreno Valley
c/o City Hall/ clerk's office
14177 Frederick St.
Moreno Valley CA. 92553

Dear Council members

mi nombre es Lucio y les pido que ustedes como councilmembers apoyen este proyecto de World Logistics Center por favor no dejen pasar esta oportunidad que tenemos con este proyecto para mejorar nuestra ciudad, ustedes pueden hacer la diferencia. gracias

Lucio Rodriguez

[REDACTED]
Moreno Valley CA. 92553
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 59

May 2nd, 2015.


City Councils of Moreno Valley
c/o City Hall / Clerk's office
Moreno Valley, Ca. 92553

Dear Councilman Price.

I am a supporter of the World Logistic Center, of our Region. I am very exciting with this opportunity to get more jobs for our families.

We are asking to You, to approved it for the benefits of our Community.

Thank You Very Much
Sincerely.

Mrs. Margarita Esparza
Margarita 


MORENO VALLEY 92553


CITY COUNCIL
MORENO VALLEY
RECEIVED

6/2/15 15 JUL -7 PM 4: 58

City Council of Moreno Valley
C/o City hall / Clerk's office
14177 Frederick St.
Moreno Valley CA 92553

I'm writing to you to express my support for the World Logistics Center project. I have 3 girls and I used to work in Los Angeles. I stopped working because I had nobody to babysit for me, due to my job. We need more jobs in our city. So we could not worry about our kid. Please accept the project. So we have a chance for new jobs, for the future.

Thank you
Bentha Plotkin
[REDACTED]
Moreno Valley CA 92551
[REDACTED]

Bentha Plotkin

CITY COUNCIL
MORENO VALLEY
RECEIVED

6-1-15

City Council of Moreno Valley
 To City Hall / Clerk's Office
 14177 Frederick Street,
 Moreno Valley, California 92553

Dear councilmembers:

I would just like to inform you that I believe that there should be more jobs provided, in Moreno Valley. My father has to drive ~~for~~ four hours to and from work. He comes home at two in the morning and then must leave at seven. So, I ask if you would open the opportunity to ~~be~~ have more jobs ~~available~~ available in this area. There would be less stress on the parents, my dad, and the kids. Believe it or not we stress to about if our parents are ~~at~~ coming home safe or not as we are sleeping. I do hope that you approve of this, thank you.
 The World's Logistic Center.

Sincerely,

Alexis Plotkin

Moreno Valley
 Cal 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

06-02 - 15

15 JUL -7 PM 4: 58

City Council of Moreno Valley
 to City Hall/ Clerk's office
 14177 Frederick Street
 Moreno Valley, California 92553

Dear Councilmembers:

Tengo 65 años de edad y vivo en esta hermosa ciudad. Lo apruebo el que vengan trabajos a Moreno Valley para los jóvenes para prevenir crímenes. Den los permisos para que el proyecto de Moreno Valley the World Logistics Center se empiece a construir y haya más trabajos para todos y tengamos mejores servicios en la comunidad.

Gracias
 Juan Delgado (Juan A. Delgado)

Moreno Valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-27-2015

City hall ^{15 JUL -7 PM 4:59} clerks office
14177 Federico Street
Moreno Valley CA 92553

To City Council + planning Commission

My name is Esther, I have lived in Rancho Belago (Moreno Valley) since 2013. I have a daughter, son-in-law, 3 Grand daughters a Grandson, and four great grand children two great great grandchildren,

I am all for creating jobs here in Moreno Valley (Rancho Belago) to bring revenue into our city.

Sincerely
Esther Randle

CITY COUNCIL
MORENO VALLEY
RECEIVED

6-1-15

to

15 JUL -7 PM 4:59

city council of Moreno Valley
1/2 city Hall / clerk's office
14177 Frederick st.
Moreno Valley CA. 92553

Dear council members

estoy escribiendo esta carta a ustedes miembros del concilio de Moreno Valley porque ustedes pueden hacer la diferencia en esta ciudad apoyando este proyecto de World Logistics Center, como ustedes saben nuestras escuelas necesitan mucha ayuda con nuevos programas para nuestros hijos.

tengo 3 hijos y 14 años viviendo en esta ciudad me gusta mucho vivir aqui por favor apoyen este proyecto

Martha Torres

[REDACTED]
Moreno Valley CA - 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4:59

June 2, 2015

City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553

Dear Council Members:

I am in complete and total agreement with the World Logistics Center. I do not understand why it has taken so long to approve a building that would benefit Moreno Valley as a whole. The World Logistics Center, will bring in a steady flow of traffic that will benefit small mom and pop shops. With increased traffic there will be an increase in revenue for the city. This city is close to bankruptcy just as San Bernadino. We can and will do better, especially with the completion of the World Logistics Center next year 2016.

Thank you!

Sincerely,



Joe Muniz

Moreno Valley Resident

Moreno Valley Ca 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 59

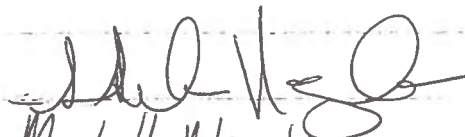
June 1, 2015

City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553

Dear Council Members:

As a woman in a male dominant world, I have always fought for what I believed in. No matter what the opposition may say, I have never swayed my mind on how the World Logistics Center will be beneficial. There are many doubters that say I do it only for the money, but how can that be true if he is contributing more than he would receive. I only want progress and what is best for the City as a whole, not just myself. Please approve this project so that we can thrive as a City, and Dominate our competing cities. This World Logistics Center will provide the City with extra revenue that can be used for repairs to our once beautiful city. If we work together we can do it.

Again, Please think of the benefits and the long run future of benefits from the World Logistics Center (WLC).

Sincerely, 
 Mashell Negrete
 Moreno Valley Resident

Moreno Valley Ca 92557

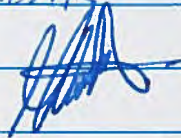
CITY COUNCIL
MORENO VALLEY
RECEIVED

5/27/15

15 JUL -7 PM 4: 59

City Council of Moreno Valley
c/o City Hall Clerk's Office
14177 Frederick Street
Moreno Valley Ca 92553

I am writing this letter to express my support to World Logistic Center, I would like this city to have more jobs since all my family has to commute everyday to work. Also we need more school, we also need more parks and recreational areas for our future generations. Please I urge to approve this project for the benefit of us Moreno Valley resident.


MARIELENA VELEZ

[REDACTED]
[REDACTED]
MORENO VALLEY CA 92551
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 59

6-2-15

City Council of Moreno Valley
40 City Hall/Clerck's office
14177 Frederick St.
Moreno Valley, CA 92553

Dear Councilmembers:

I am expressing my support for the
World Logistics Center Project. I am
72 years old and I feel that your ~~people~~^{young} people
should be able to find jobs in there city.
To avoid crime, so they could feel good
about them selves.

Thank You
Pat Plotkin, (Pat Plotkin)

Moreno Valley CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 59

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

June 11, 2015

As a college student, it is already difficult to find jobs. I believe with this project it could open a vast amount of job opportunities. When people have jobs they get money, they will spend more money. That will improve the business around and increase the amount of tax coming into the city. Then that money could be used to improve ~~the~~ the city, which ~~will~~ will make people want to live out here. Then that cycle will continue in a positive slope. ~~I may be young~~ The reasons people sell their houses and leave is because there is no jobs. Everyone I ask works towards ~~LA~~ Los Angeles, where all the jobs are at. I may be young ~~and~~ but I ~~am not~~ ~~not~~ understand how things work. I am a Business Major after ~~all~~ all. This is a good thing and I hope it gets passed.

sincerely, Eddie Escobar
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 22

May 9, 2015

City Council of Moreno Valley
 c/o City Hall / Clerk's Office
 14177 Frederick Street
 Moreno Valley, CA 92553

Dear Council Members;

I'm writing this letter to show my support for the World Logistics Center project, I support this project because bringing jobs to the city of Moreno Valley is an important thing that I would like to address. I believe this is very important because this is my future and I would like to get a good job once I grow up. Right now, my father commutes to a different city to go to his job, and he gets home around 5 o'clock or 6 o'clock and around that time I am getting ready to go to bed but before that I shower. When he gets home he doesn't help me with my homework or anything but only sometimes. If there were better and more jobs here ~~he~~ he would not have to go to a different city to work. As has been said this is my future and in a few years I will be going to college and I don't want to have to commute all the way to a different city just for a job. I would like to stay here and there be a good job for

me and for my older sister and brother.
So I ask, from the bottom of my heart, to
please support the World Logistics Center pro-
ject.

Sincerely,
Abigail Lepeda : Age: 12 ☺

Abigail Lepeda

[REDACTED]
Moreno Valley CA: 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 23, 2015

15 JUL -6 PM 5: 22

City Council of Moreno Valley
City Hall / Clerk's Office
14177 Frederick Street,
Moreno Valley, California 92553

Dear Councilmembers

I'm writing to you to express my support for The World Logistics Center Project. I am supporting this project today because I believe this project will allow ~~for~~ more parents to spend more time at home rather ~~than~~ than at work.

= Sincerely
Johanna Gonzalez
~~Moreno~~ Moreno Valley Resident
[REDACTED]
Moreno Valley, CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-9-15

City of Moreno Valley City Council and Mayor
14177 Frederick Street Moreno Valley Ca 92553

Dear Council Members I live in Moreno Valley since 2002 I have two sons I don't have a job for 2 years because I can find one in my own city does why I support the World logistic center business park because it will bring thousands of jobs opportunities to my city of Moreno valley every family that live in M.V can benefit from this mega project I have member that work in long beach they commute every day this is no life for any family please support this project

because is the future jobs of the New generation I am including my own children - on it we have being thinking of moving out of Moreno valley why? because No jobs

Understand a city with out a job force base is not a city. plus we need the tax revenue for our city

Sincerely

Rosa Cresanto

Moreno valley ca 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

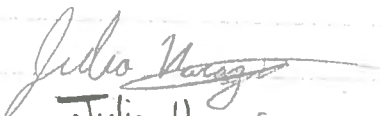
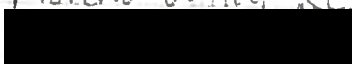
15 JUL -6 PM 5: 22

June 11, 2015

City Council of Moreno Valley
C/O City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

I would like to say that Moreno Valley is my home, and I love my city. The (WLC) World Logistics Center will benefit our city and the residents. Please start the development so I can know if I should take any logistics classes. I am very excited for this project.

Sincerely, 
Julio Vargas
Moreno Valley Resident
Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PH 5: 22

to

City Council of Moreno Valley
c/o City Hall/ Clerk Office
14177 Frederick St.
Moreno Valley Ca. 92553

I Agustin Torres
would like to say that
I support world logistic
center that is going to
bring jobs to the community
of Moreno Valley and tax
revenues that probable can
benefit that Police Department
bringing more police work

Sincerely

Agustin Torres

[REDACTED]
Moreno Valley Ca 92551[REDACTED]
Agustin C Torres.

5/13/2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

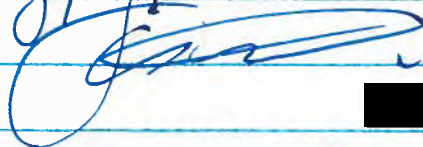
15 JUL -6 PH 5: 22

City Council of Moreno Valley
 C/O City Hall / Clerks office
 14177 Frederick Street, Moreno Valley CA 92553

Dear Council Members,

My name is Joseph Cordie and I am writing this letter to advise you to approve this "WLC" project asap. My wife and I are retired and don't see any benefit for us but we would like to see this city prosper and see the new greatness flourish with success. Financially this city needs jobs and this is the time to make it happen. As a "no brainer" Highland Furniture is the organization that is giving us the opportunity to do this, don't waste the chance to do so and make the right decision...

Sincerely,



Moreno Valley Ca. 92555

May 16., 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:21

CITY COUNCIL OF MORENO VALLEY
C/O CITY HALL / CLERK'S OFFICE
14177 FREDERICK ST.
MORENO VALLEY, CA 92553

DEAR COUNCIL MEMBERS,

I'M HIGHLY CONCERNED OF MY PARENTS WELFARE LIVING IN YOUR CITY. I CURRENTLY MADE MY HOME WITH MY OWN FAMILY IN EASTVALE, BUT ONE DAY I MAY LIVE IN MORENO VALLEY IN THE FUTURE. I JUST HOPE FUTURE PLANS WILL BETTER THE COMMUNITY AND NEIGHBORING CITIES. THE TRAFFIC ON THE 60 FWY WEST BOUND IS DRAMATICALLY EFFECTING AS ONE EXAMPLE. IT IS ALARMING TO BE INFORM^{ED}~~ED~~ OF THE HIGH TAXES IN THE CITY. SOMETHING NEEDS TO BE CHANGE. THANKS FOR LISTENING TO MY CONCERNS.

APPROVE THIS PLAN!!!

RONAN LANSANG

[REDACTED]
EASTVALE, CA 92880

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PH 5: 21

May 27, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

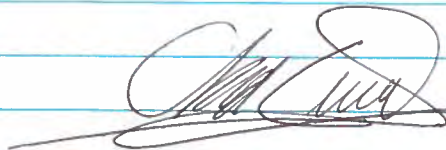
Dear Council members,

I am a resident of Moreno Valley I have been living here for 8 years, I am retired but I have children that will greatly benefit from the project, Also I have grandchildren that go out of the city to school.

The World Logistics Center is a project that will benefit not only my family but the whole community of Moreno Valley with tons of jobs and also tax money that will benefit the schools and the entire city.

Please approve this project.

Thank you very much.



Maria A. Hernandez

Moreno Valley CA
92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

5-25-2015

15 JUL -6 PM 5: 21

City Council of Moreno Valley
% City Hall / clerk office
14177 Frederick St. Moreno Valley ca,
92553

Hello, my name is Vanessa Nelson.
I have been living in Moreno Valley for 5 years.
I am a young professional who does Property
Management and Real Estate. I have no
kids. I enjoy the outdoors and staying
in-touch and actively involved with my
community. I have commuted for 5 years
now. I enjoy my drive in and out of work.
I always give myself enough time so I'm
never stuck in traffic. Commuting has not
affected my life in anyway. I would
never think twice about living in Moreno
Valley and commuting.

The World Logistics Center
would be one if not the best thing
that could happen to Moreno Valley. This
project will bring more jobs, money,
and city awareness. All not only helping
the City of Moreno Valley itself but
having a rippling effect across our state
and expanding eventually to our economic
balance as a nation.

6-1-15


CITY COUNCIL
MORENO VALLEY
RECEIVED

to

15 JUL -6 PM 5: 21
CITY COUNCIL OF MORENO VALLEY
1/2 City Hall/derk's office
19177 Frederick st.
Moreno valley CA. 92553

Miembros del consejo de Moreno valley Mi nombre es Jose Mauricio, tengo viviendo 26 años en Moreno valley y 18 años trabajando en Fontana, estoy muy cansado de tanto manejar lejos a mi trabajo. yo les pido que apoyen a World Logistics Center va a ser de mucho beneficio para nuestra ciudad y para nuestros hijos con mejor escuela y poder tener mas policias cuidando, gracias por su apoyo

José Mauricio Guzmán Guardado

F.  Moreno valley ca. 92553

My name is [redacted] and

City Council members

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 26, 2011

as a citizen of Moreno Valley since September of 1988, I am concerned for the betterment of the job situation in this city. Therefore, I am in support of Highland Fairview and the development of the World Logistics Center.

My involvement is the Spiritual Development of our city. I am the Senior Pastor of Faith Baptist Church located at Peris at Eucalyptus. We have the Faith Bible and Book Center, the only Christian Bookstore in the city. People need employment and wages to be enabled to support their families in Spiritual Development and Bible and Book purchases.

I believe that Economic Redevelopment is vital to keep our lovely city stable. Thus World Logistics is a good endeavor and the citizens of this city needs to support its development.

Abel Dalhaqverment

[redacted]
Moreno Valley, Ca 92557

[redacted]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 21

June 1st, 2015

City Council of Moreno Valley
100 City Hall / Clerk's Office
14177 Frederick St.
Moreno Valley Ca 92553

Dear Council Members:

Hello I am a Moreno Valley resident, and I am a father of 5. I believe in the best for my kids and I believe the World Logistics center is the best. I want my children to have unlimited possibilities.

This World Logistics center will hopefully provide jobs to those who are dedicated and hard working.

Again please approve this project now, so that we can begin to build our city back up. Thank you for taking out the time to read our concerns about our amazing city.

Sincerely, *Rosa Maria Sosa*
ROSA MARIA SOSA
Moreno Valley Resident
[REDACTED]
Moreno Valley Ca 92553

Mayo - 22 - 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5:21

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Councilmembers

Mi nombre es Maria Torres tengo viviendo 6 años en esta ciudad soy madre de tres niños soy ama de casa y una de mis mayores preocupaciones es que mi esposo tiene que salir a trabajar fuera de la ciudad. Por 12-0-14 horas y yo y mis hijos necesitamos a mi esposo que este mas tiempo con nosotros por que no puede encontrar trabajo cerca de casa yo apoyo el Proyecto WLC porque ese Proyecto traera trabajo para Moreno Valley y traera ingresos de los impuestos. Para la ciudad

Podemos tener una mejor comunidad, mejores escuelas para nuestros niños, mejor seguridad mejor oportunidad de trabajo. Por eso solicito que pesen este Proyecto y hacerlo realidad para un mejor Moreno Valley

Maria Torres / [REDACTED]

CA 92553

MAY 16, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 21

CITY COUNCIL OF MORENO VALLEY
40 CITY HALL / CLERK'S OFFICE
14177 FREDERICK STREET
MORENO VALLEY, CA 92553

DEAR COUNCIL MEMBERS:

ME + MY HUSBAND LIVES FOR MORE THAN 30 YRS
IN MORENO VALLEY. FOR MORE THAN 30 YRS
I HAVE NOTICED WHEN IT COMES TO IMPROVING
THE LIVING STANDARD OF MOST THE FAMILY THAT
LEAVE HERE ~~ARE~~ NEVER CHANGED.

WERE ARE FOR WHAT THE "WORLD LOGISTIC CENTER"
PLAN TO IMPROVE THE LIVING STANDARD OF THOSE
LEAVE LIVE HERE. ITS TIME THE MORENO BE RECOG-
NIZED OR TO BE RECOGN WITH AS CENTER OF
LOGISTIC TRENDS TO IMPROVE & LET PEOPLE TO
STAY + WORK HERE IN MORENO VALLEY SO THEY
CAN SPEND MORE TIMES WITH THEIR FAMILY
TO GUIDE THEIR KIDS TO BE GOOD CITIZEN OF
UNITED STATES OF AMERICA.

Lourdes Tomanena
[REDACTED]
Moreno Valley CA 92557.

YOURS VERY TRULY,
LOURDES TOMANENA
"CONCERNED RESIDENCE"
[Signature]

8/13/15

City Council of Moreno Valley
 c/o City Hall / Clerk's office
 14177 Frederick Street, Moreno Valley Ca 92553

CITY COUNCIL
 MORENO VALLEY
 RECEIVED
 JUL - 6 PM 5: 21

Dear Council Members,

My name is Rowland Ellen Corallo and I have lived in Moreno Valley for the last 22 years. We used to own a business called "I do weddings" we were the only business of this nature in the area. My husband and I were both ordained ministers so perform wedding ceremonies and authorized to issue marriage licenses. Business was great until the 2007-8 years. The real estate market and the bad economy forced us to close our business and eventually our house was lost. The "WLC" is a project that will benefit not only the city revenue, but the overall economy in the Inland Empire but especially here in Moreno Valley. It's very simple math, where there is jobs there is good economy. The people of Moreno Valley needs this project for obvious reasons, we beg you

Please approve this asap! we (Moreno valley) have been waiting for this opportunity for the last 20+ years.

P.S. we lost our house in M.V. Ranch in 2013 due to the lack of business (no jobs in Moreno valley). Let's move on and prosper!

Generally,

x Rev. Elizabeth Cordis

[REDACTED]
Moreno Valley Ca 92555

A.1.z

Packet Pg. 1038

15 JUL -6 PM 5: 20

CITY COUNCIL
MORENO VALLEY
RECEIVED

To whom It May Concern:

Moreno Valley Council members.

My Name is Miguel Gutierrez

I have been a resident of
Moreno Valley for approx. 7 years
We moved to this City in late
2008.

I was informed about a project
that would bring new work/job
opportunities to this area...
of town.

I personally have to travel
outside of Moreno Valley y Riverside
County to get to h.d. y h.d.
County cities (Monrovia, Pasadena)
to get to my work. or place
of employment.

As I have been traveling to h.d.
County for approx. 7 years.

I have seen & experience
 how. Thousands of people have
 to commute, every day, from where
 I live, to h.v. County, everyday,
 of the working week, and love
 that commute, which takes
 one, approx. One hour and a half
 (1 1/2 hrs) just to get to work
 and, One hour and a half to
 get back home, that is if
 there is not a lot of traffic.
 That adds up to 3 hrs of commute
 per day, plus approx. \$25-30 dollars
 in gasoline for one days trip.
 which adds up to 125-150 per week
 in gasoline money, plus wear and tear
 on my ~~best~~ vehicle, and the
 stress and physical exhaustion
 on my ~~body~~ physical, & emotional life.

— This I see. on many of my fellow commuters, partners... and my self.

— the other. Situation with commuting. Outside of this city is that. we don't get to rest & enjoy quality time with our families.

— I'm not that informed with the details of this project. — that's being proposed, in this city. but. I personally know that it would benefit many people, families & the economy of this city...

— the world is changing and. I believe that. we need to prepare

for the future.

We look forward for new opportunities
in the City of Moscone Valley.

Thank you.

Sincerely,

A. Resident of Moscone Valley
Miguel C.

[Redacted]
[Redacted]
[Redacted]
Moscone Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

May 16, 2015

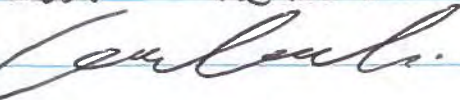
15 JUL -7 PM 5: 02


City Council of Moreno valley
c/o city Hall /clerk's office
14177 Frederick Street,
Moreno Valley, California 92553.

Dear councilmembers;

My name is José Velarde I have 3 years to live in Moreno Valley, I married and I have 2 children, actually I work in landscaping. I am writing to you to express my support for the World Logistics Center project. I support this project because we need more opportunities jobs. for me the most important thing is open the doors a good projects to make a grow Moreno valley and World Logistic Center is the best project. In the future, I want to my children work in this beautiful city and we'll live in Moreno Valley.

Please think about it, and make decision to support and approve the World Logistic Center.

José Velarde



Moreno Valley CA.
92553.

6-2-15

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -7 PM 5:00
City Council of Moreno Valley
c/o City Hall/ clerk's office
14177 Frederick St.
Moreno Valley CA. 92553

Yo Blanca Rodriguez apoyo el proyecto llamado World Logistics Center porque creo que esto ayudara a que haya mas trabajo aqui en la ciudad de Moreno Valley y la comunidad completa se beneficiara con todo lo que este proyecto traera a la ciudad, Yo les pido a ustedes council members que apoyen este proyecto que nos ayudara a mejorar nuestra ciudad, ustedes pueden hacerlo.

Blanca Rodriguez


Moreno Valley CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 00

May 30th, 2015

c/o City Hall / Clerks office

14177 Frederick Street,

Moreno Valley, California 92553

Dear Councilmember's;

I've moved out of Moreno Valley a couple of years ago do to the fact the city has done nothing to improve there no job dilemma over 30 years of the same thing bringing the world logistics center is a no brainer. kicking more people out of a city going bankrupt or bringing the opportunities needed to keep the city running, If you're strategy hasn't worked in 30 years what makes you think it's going to work now.

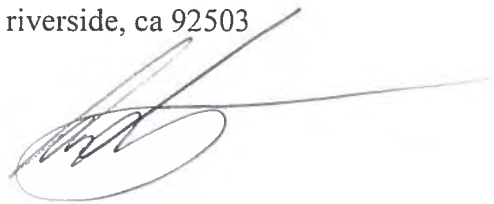
Bring the world logistics center and get this ball rolling

Sincerely,

Michael McNair

[REDACTED]

riverside, ca 92503



CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 00

May 30th, 2015

c/o City Hall / Clerks office

14177 Frederick Street,


Moreno Valley, California 92553

Dear Councilmember's;

There is nothing more disappointing then seeing a city go under do to the fact there is no tax revenue coming in to the city, The world logistics center is going to bring millions to the city why would you ignore this opportunity. Lets finally make the right decision and get the project approved

Sincerely,

Nicole Weaver


riverside, ca 92503



CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 00

City Council of Moreno Valley
c/o City Hall/clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

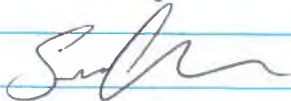
Dear Councilmembers;

I am writing to you today to ask that you work to make sure the World Logistics Center gets approval here in Moreno Valley. I enjoy living in Moreno Valley and want the best for the community and my family. I support the World Logistics Center because it will bring tons of jobs to our city. Allowing us to have a job close to home and close to our own shopping centers and restaurants.

I have been living in Moreno Valley for 19 years and am still struggling to find a decent job. A lot of my friends have good work experience and clean records, but still have no jobs. We have available land and our community is willing to work. Instead I see that land being used for building new houses, yet the community has no jobs.

Hence, The World Logistics Center would be a great addition to Moreno Valley. Providing more jobs, creating more money, and no longer being a "ghost town". Please Approve This Project.

Sincerely,



Selina Contreras, [REDACTED] St.
Moreno Valley CA, 92553

CITY OF MORENO VALLEY
RECEIVED

15 JUL -7 PM 5:00

6-1-15

to.

City Council of Moreno Valley
% City Hall/Clerk's Office
14177 Frederick St.
Moreno Valley CA. 92553

Dear City Council members,

I am writing to you today to ask that you work to make sure the World Logistics Center gets approval here in Moreno Valley. I support the World Logistics Center because if there are not enough jobs here in Moreno Valley my family and I would have to move to another city. Having lived here for many years I would not like that to happen. Thank you very much.

Sincerely,
Karla Ayala

[REDACTED]
Moreno Valley, CA, 92553
[REDACTED]

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 00

June 22, 2015

City Council of Moreno Valley
CPO City Hall / Clerks Office
14177 Frederick St.
Moreno Valley CA 92553

Dear Council members:

WLC Now! We need jobs in Moreno Valley.
I have been unemployed for over a year.
The WLC can change all of our problems.

WLC Now Please!

Sincerely,

Moreno Valley Resident

Moreno Valley CA 92557

Natrice Smith

NATRICE SMITH

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 00


June 7, 2015

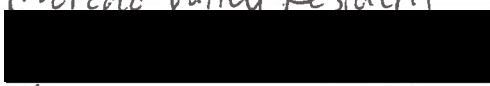
City Council of Moreno Valley
 100 City Hall/Clerk's Office
 14177 Frederick St.
 Moreno Valley Ca 92553

Dear Council Members:

Hello I am disgusted by what the opposition is saying about Iddo and the World Logistic Center. If you don't like him that is one thing, but if you don't like the progression of your city and more jobs and money, then please step down and leave Moreno Valley. Iddo is a great man who wants to help a city that is not his hometown. That should speak volumes. Instead people are saying he's buying Moreno Valley, when in reality he is only trying to help the residents since no one else is.

Sincerely, Ashley Burns


 Moreno Valley Resident


 Moreno Valley Ca 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 00

June 1st 2015

City Council of Moreno Valley
c/o City Hall/ Clerk's office
14177 Frederick Street
Moreno Valley, California 92553

Dear councilmembers:

I'm writing this letter to express my support for the World Logistics Center project.

I believe it will bring economic growth to Moreno Valley and tax revenue.

I've been living in Moreno Valley for 12 years. I'm a parent of 3 children ready to enter the work force.

And being that our city doesn't look to promising into supporting their future, I wish we can have projects like this, so they can have a opportunity to better their live.

Sincerely
Griselda Aluizo
Moreno Valley Resident

Moreno Valley CA 92557

Griselda Aluizo

June 06, 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

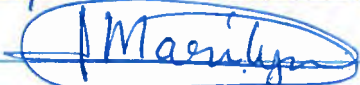
15 JUL -7 PM 5:00


City Council of Moreno Valley
c/o City Hall/Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Dear councilmembers; I Marilyn Ontiveros
Support the WORLD LOGISTICS CENTER BUSINESS -
PARK.

Because I live in Moreno Valley for 12 years and
it is nothing but houses. I wish to see Moreno Valle
grow and have more jobs, especial for our next -
generations, our kids.

I would be appreciate a lot if you consider
our petitions and considered all people that
go to Orange County, L.A, and more places
far to go to work. Because here in Moreno -
Valley it is not jobs.

Sincerely
Marilyn Ontiveros



Moreno Valley Ca. 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 01

JUNE 3, 2015

City Council of Moreno Valley
C/O City Hall - Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Councilmembers,

I am resident of Moreno Valley for 10 years. I approve the World Logistic Center project because it promises a better future for me and the next generations.

I have seen the presentation it promises a better future for the young people and a better economy for the city.

Please approve the Project.

Sincerely,

Alya Venzara

[REDACTED]
Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED
15 JUL -7 PM 5: 01

June 4,2015

Dear Council Members:

I am a resident of the City of Moreno Valley and I am currently a Pastor at the Church of MCA, for the last five Years.

Prior to joining the Church of MCA, I worked for 17 Years in the city of Orange , and I had to drive more than 100 miles a day, get up very early to avoid the traffic , losing hours of the rest and sleep, and accumulated amounts of stress and despair due to road accidents and danger. Limiting myself to have little to no time with my family or myself.

I have analyzed the project presented by Mr. Iddo Benzeeve, and I am convinced that this project can: Alleviate and help and different way a large eighth part of the community of the Moreno Valley and neighboring cities.

This project could help to alleviate traffic on the 215 Fwy, 60's, and 91.

Giving the residents of Moreno Valley more job opportunities and more time to spend with their families

This would generate more sales and stores , which generate taxes for the benefit of the City . A better economy for Moreno Valley , would give us better public services.

I firmly believe that this project would impact positively the socioeconomic and industrial development in our city and surroundings.

This project is considering a blessing to Moreno Valley , I recommend it should be approved.

I don't want this investor to go to another Country or city to realize his project thus missing our opportunity to grow , and the benefits that it would bring our families in the City of Moreno Valley .

Sincerely

Pastor Raul Leal Vazquez

Moreno Valley Resident

██████████, Moreno Valley CA. 92555 www.morenochristian.org ██████████

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 5: 01

6-2-15

CITY COUNCIL OF Moreno Valley
 c/o city Hall / CLERKS office
 14177 FREDERICK Street
 Moreno Valley CA 92555

Saludos MY nombre es
 Johana yo vivo en Moreno
 Valley y yo apoyo el proyecto
 world Logistics Center
 porque pondria mucha gente
 a trabajar y los trabajos
 estarian en la ciudad
 les pido que queden los
 permisos para que se
 construya el proyecto y la
 Ciudad este mejor gracias
 por ayudarnos

Moreno Valley CA 92555

CITY COUNCIL
MORENO VALLEY
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15 JUL - 11 PM 5:01
City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, California 92553

6/06/19

Yo Guillermina Pantoja he vivido en Moreno Valley por 22 años y he visto que nuestra ciudad a ido creciendo y me gustaria que apollen a todas las personas que esten dispuestas en invertir para hacer nuevos empleos para nuestra comunidad y asi no tengan que viajar a otras ciudades a trabajar y ese tiempo lo aprovechen con sus familias y sus hijos en los deportes que les sirve tanto a los niños por su salud ojala este proyecto se haga realidad para beneficio de muchas familias

Guillermina Pantoja.

[REDACTED]
Moreno Valley, CA
92553

June-3-15

CITY COUNCIL
MORENO VALLEY
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15 JUL -7 PM 5: 01

City ~~of~~ council of moreno valley
C/O city hall/ clerk office
14177 Frederick street moreno valley, CA 92554

Dear council members

we enjoy living in moreno valley, I am a strong supporter of the world logistic center because they will provide thousands of jobs in moreno valley, ~~and~~ also it will benefit our entire community ~~by~~ bring tax revenue, that will help our school hospital and the entire community. we need jobs and this project will put back many unemployed people.

~~As~~ please pass the ~~and~~ ~~save~~ project.

thank you sincerely

Anthony Bobrit

[Redacted address line]

Moreno Valley, CA 92551

[Redacted address line]



-3-

The World Logistic Center is A
Start of providing a better life for my
family, your family and the community.
Please, I urge you to vote for this
project - it would be a travesty to
let this opportunity slip away.

Thank you

Steve Newton
[REDACTED]

Wrens Valley, CA 92555

CITY COUNCIL
MORENO VALLEY
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15 JUL -7 PM 5: 02

June 6, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick St.
Moreno Valley CA 92553

My name is Lorna Reed. I have been a resident of Moreno Valley for 37 years. I am proud to live in Moreno Valley. However, I believe one thing that Moreno Valley lacks is high paying, mid level and entry level jobs.

I have five children. My step son does not live in Moreno Valley but my other four children were raised in Moreno Valley.

I am a member of the Moreno Valley Black Chamber and past member of the Moreno Valley Black Chamber. I plan to join the Moreno Valley Chamber again in Jan 2016.

I am an insurance agent. I work in Moreno Valley to be close to my family. I commuted for college, university and work for 10 years. Commuting kept me away from my children and family.

I think the World Logistic Center is a wonderful project which will help Moreno Valley and attract other businesses and industries.

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MORNO VALLEY
CITY COUNCIL

More jobs will reduce crime and attrition,
and separation of families.
Please call me at (951) 567-4944 if you
need more information about this letter
or my feelings.

Lorna Reed
Moreno Valley Resident
[REDACTED]
Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 21

May 26, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, California 92553

Dear Councilmembers;

I'm writing to you to express my support for the world logistics center project.

I support this project because I believe that bringing jobs and economic opportunity to our city is the most important thing we can do for our community. The project also directly responds to the city's adopted Economic Development Action Plan, which I also adamantly support.

These last 7 years I have not been able to be employed. There are less jobs in Moreno Valley so please give the permission to Moreno Valley to have the World Logistics Center. I am 25 years old and I don't

CITY COUNCIL
MORENO VALLEY
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12th - 8th - 5th - 4th - 3rd - 2nd - 1st
I have a job please dont delay or stop
this project.

Sincerely,

Antonio Reza Jr.

Moreno Valley Resident



Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PH 5: 18

May 18, 2015

City Council Council of Moreno Valley
c/o City Hall / Clerks Office
14177 Frederick Street
Moreno Valley, CA. 92553
Dear Council Member:
George E. Price,

I am writing this letter regarding the World Logistic Center. I am a resident that is very concerned about approving the project for our city. As you know, Moreno Valley is in great need of jobs, economic development and tax revenue streams in order for our city to not only survive, but also to thrive. We would not only be making sure that the future of our communities youth will have opportunities, but we will also be a part of decreasing the emissions that are released into the environment from all of the traffic that travels west bound for work. The World Logistic Project is also the type of development that we need for commercial businesses in order to maintain a cleaner environment & resources of sustainability. Please support and vote for the World Logistic Project for a better future in Moreno Valley and progress which is eco-friendly. I hope and pray that your eyes & mind

15000
15000
15000

12 JUL 21 8:12 AM

Will open to what our city needs in order to survive and succeed.

Sincerely,

Marisa González - District 3

[REDACTED]

Moreno Valley, CA. 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

05-26-2015

15 JUL -6 PM 5: 21

City Council of Moreno Valley
c/o city hall / clerk's office
14177 Frederick St
Moreno Valley, CA 92553

My name is Manuel Garcia, I'm an Electrician member of the Local Union #11 Los Angeles County. I'm 50th years old and I had living in Moreno Valley for the last twenty five years and I have to go every day to L.A. to work over there because right here there are not to much work, usually take me one hour and a half every day in the morning driving to my work but in the way back home, specially in fridays take me like 3 hours ~~in~~ in my way back home

I'm supporting this project WORLD LOGISTIC CENTER because I'm really believe will be good for the city and for ~~the~~ us; the residents of Moreno Valley because will be create hundres or even thousands of new jobs. I have my wife and three kids; my son 21 years

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MORENO VALLEY
CITY COUNCIL

12 JUL - 6 54 21

my daughter's 18 & 16 and I hope
and believe they can have a good
job right here in the city and
don't have to go outside like me
looking for work.

Sincerely
Manuel Garcia

Manuel Garcia

[REDACTED]
Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
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15 JUL -7 PM 4: 55

5/30/15

City Council of Moreno Valley
Clerk's office
14177 Frederick St
Moreno Valley, CA. 92553

Dear Councilmembers;

I'am writing this letter to express my support to the World Logistic Center. I have been a Moreno Valley resident for almost twelve years and since I first moved to Moreno Valley I haven't see much change neither an sustancial economic growth in our city. I am a mother of four and a housewife whom has strggled a lot to find a job close to home and be able to keep attending my home, wife and mother duties. When I first moved to Moreno Valley my daughters were little children, now they are older and ready to enter the labor field which it doesn't look to promising. I do worry about my daughters future because it looks like they will be doing what everybody else in Moreno Valley is doing for years: commuting to other cities to find a job.

My husband has been commuting to Fontana everyday. I don't want that for our children; they deserve more job opportunities.

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MORENO VALLEY
CITY COUNCIL

12 JUL - 1 PM W: 22

So, please consider us, Moreno Valley residents as priority ~~is~~ before taking a decision. Say yes to more job opportunities, tax revenue and an economic growth for our city, we deserve it! Say Yes! to the World Logistic Center.

Sincerely,
Julissa R. Wuence

[REDACTED]
Moreno Valley, CA 92557.
JWuence

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PM 5: 20

May 9, 2015

Ingrid Johana Torres

13886 Redlands Blvd.

Moreno Valley, CA 92555

Dear Councilmembers;

My name is Ingrid Torres, I was born in Colombia South America, came to U.S.A in 2003 for better opportunity, met my husband Ulises Marin in 2010, had a daughter who is 3 years old now, and recently moved to Moreno Valley with my little family because we want to improve our life style and the community in Moreno Valley is a great match for our spectations.

Since I found out about the World logistics center project I felt like it was my responsibility to support and to be an active member of this project. I am a supporter on the Idea of getting Moreno Valley economically independent and to get our community at a table where sustainability is provided within the city's own regions. That is the main reason why I woke up this morning to be here.

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CITY COUNCIL

12 JUL 2015 8:45 PM
To conclude this letter I would like to express my support towards the World Logistics Center who's members are doing a exceptional job at pushing through to make Moreno Valley a better place. Please Make these efforts worth something for a better tomorrow in the Moreno Valley Community.

Thank you so much.

Sincerely, Ingrid Torres.

Ingrid Johana Torres
Moreno Valley, CA Resident.

[REDACTED]
Moreno Valley, CA 92555

CITY COUNCIL
MORENO VALLEY
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Sabado-23-Mayo-15

15 JUL -7 PM 4: 40

City Council of Moreno Valley
70 city Hall / clerk's office
14177 Frederick Street.
Moreno Valley, California, 92553

Hola: soy Martha Villanueva, tengo de vivir 7 años en la Ciudad de Moreno Valley CA. Soy mamá de un niño de la Edad de 12 años.

Mi Esposo tiene Que Salir fuera de la Ciudad de Moreno Valley 2 Horas de manejo de vida 2 Horas de Venidad llega super estresado del trafico. Estuvo enfermo un tiempo por tanto estres

La Verdad. Me gustaria Que hubiera mas Oportunidades de trabajo en esta Ciudad tanto Para nuestro hijos y Decendecias.

Por favor den la oportunidad. Para estos trabajos Dando los Permisos. Para El Proyecto de World Logistics.
muchas Gracias Por su atencion.

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MORONO VALLEY
CITY COUNCIL

Esperamos Ver esta construcción.

Atto Martha Villanueva



Morono Valley Ca.

92553

tel



Martha Villanueva

CITY COUNCIL
MORENO VALLEY
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15 JUL -7 PH 4:40

Dear Councilmen Price

My name is Pastor Dale Calangeb. I am currently head pastor at Sovereign Grace Community Church. I have lived in Moreno Valley since 1980. I grew up on the East side of town on Redlands Blvd and was part of the first graduating class at Valley View High School. In 2003 I moved to the Northern side of town off of Pigeon Pass. Growing up on the Eastside of Moreno Valley (what's now Rancho Bellago) was always a choir growing up as a young person. Not having anything near you made life boring and frustrating as a young person. Part of the reason I moved to the other side of town was because there was simply more stuff to do and more businesses around. I grew up seeing most of my friends move out of the city because Moreno Valley was viewed as a "backwards" city. Because I planted a church in Moreno Valley in 2,000, I ended up staying here and being involved in the community. One of the biggest issues the younger members of my church face are lack of job opportunities. I would have loved to have this type of infrastructure growing up and I think we need it now more than

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CITY COUNCIL
MORENO VALLEY
JUL 12 11 41 AM '07

ever. The future of Moreno Valley is of
believe ~~is~~ in the balance. Our city can
either rise ~~of~~ fall with the decisions
we make now towards the World Logistics
Center and the other businesses we
bring in. I hope you and the other representatives
of the city will seek to make this happen.

Pastor Dale Calangeo

[REDACTED]

[REDACTED]

Moreno Valley, CA 92557

Dear George E Price - City Council
 MORENO VALLEY
 RECEIVED Moreno Valley
 c/o 15 JUL - HARRY K. K's Office
 14177 Frederick Street,
 Moreno Valley California 92553

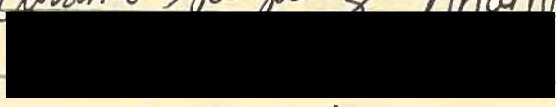
My name is Anami Gonzalez, I am 16 years old and a residence of Moreno Valley. I been living here since 2008 and since I moved here there has not been any jobs made, and there weren't many jobs when I first moved here. I always wondered where ~~and~~ I grow up where am I going to work with out having to leave my own city. Growing up my mom has always been a single mother. When we moved to Moreno Valley she would always have to drive to Los Angeles about 4 times a week to work. Having four siblings older than me was a plus specially for that situation. There has been times I've been at school and needed to get picked up, but my mom happend to be in Los Angeles working. It's not a good feeling not having your mother in an emergency. Thank god my siblings were able to come and make sure I was okay. Having to drive out your city for a job is one big reason I support the world Legistics center.

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CITY COUNCIL

Another reason is my future, and my families future. Bringing jobs to Monero Valley can eliminate having to wake up at 2, 3, 4, o'clock in the morning ~~to~~ just to make it on time for work. I have friends now in highschool and collage that have to drive out of Monero Valley for work. Its very stressful for a teenager and young adult, even for a grown up its ~~is~~ is hard harsh on the body. It is very un healthy to drive on the road for hours, and takes a lot of time of your life that can be spent on family or self activities. Another reason is so when I get a family of my own I can stay in my city to provide for my family. As a youth this project is my future and I would like you to help me support mine and all the other residents of Monero Valley.

Sincerely,

Anami Gonzalez - Anami Gonzalez



Monero Valley CA 92555

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PH 4: 52

April 30, 2015

City Council of Moreno Valley

C/o City Hall / Clerks office

14177 Frederick Street,
Moreno Valley, California 92553

Dear councilmembers

Yo Sylvia Rodriguez
Creo que los parques estan
bien descuidados, las escuelas
necesitan mas cuidado ~~en~~
para cruzar a los niños hay
mucho peligro al cruzar
la calle, los parques estan
otro peligro no hay mucha
seguridad para que juegen
las calles estan bien dañadas
cuando uno maneja, espero que
este proyecto se agan mas
oportunidad para trabajar, hay
muchas necesidad.

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MORENO VALLEY
CITY COUNCIL

JUL 21 5 25 PM '25

Sylvia Rodriguez



Moreno valley

Ca 92553



CITY COUNCIL
MORENO VALLEY
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15 JUL -7 PM 4: 50

5/9/15

City of Moreno Valley, City Council and Mayor
City Hall / Clerk's Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Council members,

I am writing to you to ask you to make sure the World Logistics Center is approved.

I was working in Murrieta for 2 years and I was working at night I had to leave my family. I had to drive far, alone and at night, because there is no jobs in the city. It's very hard for a woman to work at night and having to commute to other cities because the lack of jobs in the city, it is a dangerous situation.


This is the reason why I approve this project because it will bring opportunities of work for our community. and our children should not be left alone, our children need their parents working in a local jobs.

Another reason why I approve this project because it will bring more public safety

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MORENO VALLEY
CITY COUNCIL

12 JUL 21 11:20 AM
more police officer to our neighborhoods.

Dear council member I urge to
approve the WLC project for a
better Moreno Valley, better
economy in our city.

Sincerely

Leticia AVINA

[Redacted address line]

Moreno Valley, CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -7 PM 4: 50

May, 08/2015

City Council of Moreno Valley
c/o City Hall / Clerk's office
14777 Frederick Street,
Moreno Valley, California 92553

Dear council members;

I'm writing to you to express my support for THE WORLD LOGISTICS CENTER PROJECT, I believe that MORENO VALLEY needs to grow up.

I was driving for almost 9 years from here to Ontario ~~spending~~ spending time in the freeway ~~every~~ everyday and having my son with 3 months old, taking care of the babysitter. The only day that I can spending with him it was on Sunday, do you think that was good for us??

What is the reason that you are not supporting this project?

The World Logistics Center would be a huge step to better our Community. We have missed this opportunity in Moreno Valley; please don't let this opportunity get away from us.

→

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MORENO VALLEY
CITY COUNCIL

12 JUL 7 4 14 PM '21
Please listen to us!! Thank you!!

Sincerely,

Sheila Nieto
Moreno Valley Resident

[REDACTED]
Moreno Valley, CA 92553

CITY COUNCIL
MORENO VALLEY
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5-16-20

To: City of Moreno Valley, City Council and Mayor
14177 Frederick St.
Moreno Valley, California
92553

I have been in Moreno Valley with my 4 children and 12 grandchildren for 23 years. Even though I am retired I'm still involved in the community.

C.A.S.A. Court Appointed Special Advocate For The Riverside Juvenile Courts, Senior Citizens Board, Chamber of Commerce, Toastmasters, Champions of Honor Mens Group, Inland Empire Poets, Riverside Renaissance Writers group, LivingWay Christian Fellowship Church. Teach Creative Writing at The Library, Community Senior Center and R.C.C.

I spent too much time commuting to LA and Pomona which affected my family drastically. The World Logistics Center by bringing jobs & revenue here will keep this from happening to many of our children and others will also help support our children, Police, Fire Dept, Utilities and local businesses.

The Logistics Center will not ^{have} any negative environmental impact or health issues.

Also very little traffic impact since trucks do not need to travel during peak hours.

12 JUL - 1 14 44 PM '10
MORNO VALLEY
CITY COUNCIL

The World Logistics Center will bring MORENO Valley
into the modern world by providing training in our
local schools and construction jobs to jump start
our economy. Logistics is NOT restricted to any one
Area it gets income from all over the world.
Please join me in supporting the World Logistics Center

Thank you.

Richard I. Harry
Local Writer and Poet

Richard I. Harry

[REDACTED]
Moreno Valley, CA.

92552

CITY COUNCIL
MORENO VALLEY
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15 JUL -7 PM 4:50

April 30, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Fredrick Street
Moreno Valley, CA. 92553

Dear Council Members,

I have lived in Moreno Valley since 1999. When I first moved here I, like most residents, had to commute to work. With that said, I would hope and ask that you work to support the World Logistics Center.

Like I stated earlier, I commuted to Diamond Bar/Brea to work when I first moved to Moreno Valley. Trying to raise 3 kids while commuting in traffic 3-4 hrs a day was difficult. Having them in day care and school was logistically challenging for my wife & I. Trying to be involved with my children we were also involved in Scouting & youth sports. Imagine trying to do this while working out of town. Bringing industry to our city, our region will bring prosperity to our area, and families can have time to be family because

(over)

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MORENO VALLEY
CITY COUNCIL

12 JUL 7 - JUL 21
12 PM 4: 20

Mom & Dad will be home. Home to help with homework, home to cook dinner, home to play with the kids. Less commuting means traffic on the roads & freeways.

Working where you live means more tax revenue as people will shop where they work and live. In the end this means more money for city services and schools. Parents won't be sending their children to out of district schools. Children are not having to be up at 4:00 or 5:00 AM because parents have to commute so far.

Moreno Valley needs this! We need to have manufacturing & industry in our city and region to bring jobs to our unemployed because when ~~we~~ individuals prosper our community then prospers.

Thank you,
Don Dean
Moreno Valley Resident

[REDACTED]
Moreno Valley, CA 92551

CITY COUNCIL
MORENO VALLEY
RECEIVED

Jun 1, 2015

15 JUL -7 PM 4: 48

City Council of Moreno Valley
c/o City Hall/Clerk's office
14177 Frederick street,
Moreno Valley, California 92553

Attn miembros del Concilio:

Somos una familia residente de Moreno Valley por 15 años y siempre hemos visto la necesidad de trabajo en esta area, ya que tenemos que trasladarnos hasta 30 millas para ir a trabajar y durar en el trafico hasta 2 horas, mis hijos han tenido que salir fuera para estudiar en otras universidades ya que las mas cercanas estan muy saturadas, y al terminar sus estudios creo que tendran que viajar muy lejos a trabajar ya que aquí en nuestra ciudad no tenemos nada; Escuche de este proyecto World Logistics Center, y estoy muy contenta al saber que traera miles de trabajos a nuestra ciudad, que ayudara a cuidar el medio ambiente y proveera muchisimo dinero para la ciudad de -

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MORNO VALLEY
CITY COUNCIL

moreno valley, y para el Estado de California, por favor Sr. Jeffrey J. Giba da los permisos necesarios para este proyecto, ya que yo creo que beneficiara a muchisima gente de nuestra comunidad.

Gracias poro su atención a la presente carta y esperamos ver un mejor futuro para nuestra familia y todas las comunidades, vecinas.

ATTE.

Laura Alvarez
[Signature]

[Redacted] Moreno Valley, CA.
92557. [Redacted]

CITY COUNCIL
MÓRENO VALLEY
RECEIVED

5/26/2013

15 JUL -7 PM 4: 50

City Council of Moreno Valley
c/o City Hall/Clerk's Office
14177 Frederick Street.
Moreno Valley California 92553

Mi Nombre es Beatriz Garcia, llevo viviendo en esta Ciudad de Moreno Valley, 21 años, soy una madre de familia de 3 jóvenes, que están estudiando, preparándose para vivir una vida futura mejor desgraciadamente, ellos han estado en escuelas, deficientes, por falta de recursos que la comunidad no cuenta con dinero suficiente para materiales. No existen trabajos para poder ayudarles a nuestros hijos, los únicos trabajos se encuentran lejos. y ellos no pueden seguir sus estudios y trabajar.

Yo como residente, les comunico, que se necesitan más trabajos, se necesitan más recursos, por lo que pregunto ¿Por qué no quieren que World Logistics Center se lleve a cabo? En las reuniones que se han presentado, se muestran proyectos de bienestar, no de mal.

A quien lea esta Carta, les suplicamos que den su voto para que este proyecto se lleve a cabo.

Existen mucha gente que quiere un mejor progreso de la Ciudad, es hora de apoyar y ver lo más grande por nuestros hijos, y juventud.

Por favor tomen en cuenta esta palabra, que una

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MORENO VALLEY
CITY COUNCIL

Madre de familia expresada. 12 JUL 2015 5:49 PM

Muchas gracias por la atención recibida y por lograr una mejor vida.

Atentamente
Beatriz Garcia

Beatriz E. Garcia

[REDACTED]
Moreno Valley Ca.

#Tel. 92553
[REDACTED]

Junio 06 2015

CITY COUNCIL
MORENO VALLEY
RECEIVED

City Council of moreno Valley 15 JUL -7 PM 5: 02
 1477 Freederik street.
 Moreno Valley CA 92553.

Yo tengo viviendo en Moreno Valley 9 años
 Tengo tres hijos uno de 19 años, 14 y
 8 años ahora no tengo un trabajo
 trabajaba en una tienda de auto servicio,
 pero por cuestión de atención a mis hijos
 y a mi esposo. estoy en mi casa en
 ocasiones cuido niños pero la economía
 en mi hogar no es muy favorable ultimamente,
 esforzandonos cada día. asistimos a una
 Iglesia donde participamos en muchas
 actividades, asistimos a las reuniones
 escolares participamos en deportes con
 mi hijo. aveces me involucro en las
 reuniones del distrito Escolar.
 A mi Esposo es al que le ha afectado directa-
 mente la distancia por los trabajos o por
 la economía ha padecido de stress
 tambien a afectado en la calidad de
 tiempo para su familia. en su autoestima.
 por lo tanto en nuestros hijos tambien
 afecta. Yo creo que el proyecto de world
 Logistics Center podria beneficiar a la comunidad
 por lo tanto a nuestras familias por que en
 verdad hay mucha necesidad de todo tipo
 financiero, Moral, Fisico como una nación libre,
 pero atada por no haber apoyo, unidad y oportu-
 nidades.
 Solo pienso que lo que se plantea y se esta
 ofreciendo sea una verdad que por supuesto ayudaria.

MORENO VALLEY CITY COUNCIL
RECEIVED

SO para nuestros hijos la educación cada día
esta en decadencia, y la seguridad ni
que hablar. Gracias por su Atención.

Mantel Fragoso, Mantel Fragoso

[REDACTED]
Moreno Valley CA 92553.

CITY COUNCIL
MORENO VALLEY
RECEIVED

15 JUL -6 PH 5: 21

May 16, 2015

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick st.
Moreno Valley, CA 92553

Dear councilmembers;

I'm writing to you to please consider in a great deal the construction of the World Logistic Center. We have consider how the city of Moreno Valley overall will be able to benefit through this great project helping schools and the city, we have to consider the growth of this city and it's citizens. This seems to be a project that will not harm but help our city in many ways one is by having a safe, secure way of producing not involving pollution but going green and taking great secure measures. At school = kids are being taught engineering, Math (STEM), technology science and The Logistic Center involves all these please consider

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MORENO VALLEY
CITY COUNCIL

12 JUL 2015 2:52 PM

This opportunity and look at all the positive things this will bring for our kids and citizens. This could be also a center where our kids at the schools can actually visualize through a tour maybe in the future to see how important school is. and be inspired.

please consider this project and hope that we soon hear the beginning of it's construction.

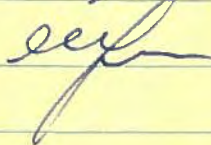
Sincerely,

Maria Ayala

Moreno Valley Resident

Moreno Valley CA, 92551

MARIA AYALA



RECEIVED
JUL 21 11:54 AM
MORENO VALLEY
CITY COUNCIL

In our area. If we have the land available
and a community that wants to work.
we should help our community so that they
don't have to commute.

Our economy has been stagnating as a result of
too few jobs.

We need to stop building more houses and
focus on more jobs for our families.

I believe that our new generations don't need
to be commuting like we have.

Beatriz V Mancilla



Moreno Valley CA 92557



Beatriz Mancilla

CITY COUNCIL
MORENO VALLEY
RECEIVED

06-06-15

15 JUL -7 PM 5:01
City Council of Moreno Valley
14177 Frederick st
Moreno Valley California. 92553

I am writing to you today to make sure that the World Logistics Center get approved in Moreno Valley.

I asked that you back this project. I have lived in Moreno Valley with my family for 25 year's.

I support the world Logistic Center because My Husband and my self are tired of spend so much time on the freeway.

I would like to belived that you have the best intrest in mind. I ask for your support for the logistic project the world Logistic Center will make a very needed change to our city Moreno Valley

I belived that the entire Coumity will benefit in many ways with this project.

I have leaved in Moreno Valley for the past 25 year's I am 50 year's old. I know that MORENO Valley need a boost.

this project will bring a lot of new job

12 JUL - 1 PM 2:01

up at 2:30 am, commute 4-5 hours a day, and like me there is thousands of families that have that same routine every day. Not to mention the wear and tear of your car and body, and putting my life at risk on the road. THIS MUST NOT continue to happen. If we have a solution why not take it, why not make Moreno Valley a beautiful place to live, to work and a city that will have economic growth.

Now we have someone that has a great vision and wants to invest in our city, we have to take that opportunity because that opportunity may not come around again, we don't want to miss the boat!

The World Logistic Center is going to benefit our city in many ways, not only it ^{will} generate millions of dollars in taxes yearly. It will improve our public safety that is so much needed in our city, it will help our schools and in general it will benefit the whole city of Moreno Valley and the surrounding areas.

I urge you City Council Members to move forward and approve the World Logistics Center.

I would like to thank you in advance for your positive response.

Sincerely,
Dilma Cecilia Enderica

Moreno Valley, CA 92553

15 JUL -7 PM 5: 01

June 7, 2015

City Council of Moreno Valley
c/o City Hall / Clerks Office
14177 Frederick Street
Moreno Valley, CA 92553

Dear Councilmembers:

I am a resident of Moreno Valley for the last 25 years. I have been commuting for 20 years, and for the past 5 years I have been looking for a good job. I have been working in the accounting field, I have an excellent clean record. Nothing should stop me from getting a good job. But the problem that we have locally is the lack of employment in the city. So I am writing this letter to the City Council members to demand the approval of the World Logistics Center. Because like me there is thousands of people looking for job opportunities, people that have long commutes out of the city because there is absolutely nothing here.

For many people like me it has been a big burden and a horrible nightmare to have moved to this city. We all moved to Moreno Valley because we saw the housing was affordable and we thought it was a good place to raise our families. But we soon realize that the sacrifice is greater than the benefit. I was away from my family

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MORNO VALLEY
CITY COUNCIL

of you, Council Members, are intelligent individuals who can clearly see that the World Logistic Center is going to open doors for jobs, funds for education, reduce traffic and of course, residents won't have to pay higher utilities. The project will contribute \$5.7 millions for our city annually. This is the answer to our city's budget. Any way, I encourage you to make the right decision for our city, and to set aside those individuals who are afraid of losing control, I know for a fact, that if all selfish interests are put aside, it ~~it~~ will be absolutely undeniable that the World Logistic Center is going to help our city in many aspects. Therefore, please listen to your conscience and approve the project, resting assured that you are doing what is right!

One final thought, the project holds high environmental standards and the traffic commotion that opponents have talked about is ~~more~~ based more on rumors than in facts as you by now know it!

Thank you for your time.

Sincerely,

Gema Q. Franco

Gema Franco

Moreno Valley CA. 92553

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MORENO VALLEY
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June 6, 2015

15 JUL -7 PM 5:01

City Council of Moreno Valley
c/o City Hall / Clerk's office
14177 Frederick Street,
Moreno Valley, CA. 92553

Dear Council Members of Moreno Valley:

I have lived in Moreno Valley for 20 years. I am now married and have my family. I am writing this letter to express my support for the World Logistics Center. I am fortunate, only a few can say this, to work here in the city. I work in ^{the} Moreno Valley Unified School District. I have witnessed how all of my brothers, friends, and many others have to commute to other cities. I have seen how many of the students I work with, only get to spend a few minutes with their dad or mom because they come home late from ~~at~~ their job. The lack of opportunities and jobs in our city ~~is~~ ^{is} affecting our families ~~to~~ ⁱⁿ a profound way. I urge you to please approve this project.

I am amazed at the creativity and investment that is put forth into the World Logistic Center.

The numerous benefits that it will bring to our city are just impressive and exactly what our city needs. I don't understand why there are opponents to

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Sincerely,
12 JUL - 1 5 2012

Ivan Vayas



Riverside CA 92507

Ivan Vayas

June 6th, 2015

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MORENO VALLEY
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15 JUL -7 PM 5: 01

City Council of Moreno Valley
c/o City Hall / clerks office
14177 Frederick street,
Moreno Valley, CA 92553

I have been a resident in Moreno Valley for about 24 years. My family as well. My occupation is Graphic Designer / Entrepreneur. I have never been active in the community until now with this project.

I have always had to commute with all my past jobs; about 8 years total. Commuting is something you have to get used to and that is not easy; Waking up early, driving far, spending extra time in traffic Etc. making it hard for me to have extra time to spend with family and friends. Due to lack of jobs in Moreno Valley I moved to Riverside

I believe that The World Logistics Center Project would be a great opportunity for our community because it will bring many jobs, boost our economy, It will also bring more money to our city that will go back into local businesses with World Logistics Center Our community

of the ~~steps~~ ^{steps} of the valley church, I do shop locally - when I can, but with the poverty in the community, there are not many stores, shops, or restaurants to check from.

I no longer commute. Commuting is a horrible life draining experience. I hate the soul and makes you hate the people around you. Several people I know commute. They ~~ride~~ ride to downtown Los Angeles Union Station. On a good day it means 3-4 hours on the train. On a bad day its much worse. I make Monday through Friday completely dedicated to work & travel.

As I stated before. The City needs Local Jobs. I want to encourage you to support job growth related development. If Husband Farwell Logistics Center is the best project on the table, vote for it and make it happen. If not then make a better project, but don't block development of the eastside. Its time to put job growth first. we don't need empty fields, or new houses, we need Jobs.

Sincerely
Thomas Shooka
Moreno Valley Resident

P.S. If you have any questions about what I have written, call [redacted] - [redacted]

Thomas H. [redacted]

[redacted] MORENO VALLEY CA 92555 CITY COUNCIL
[redacted] MORENO VALLEY
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15 JUL -7 PM 5:00

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street,
Moreno Valley CA 92553

To whom it may concern,

I was asked to write a letter in support of the Highland Fairview Project. Rather than do that, I want to write a letter in support of sustainable industrial development in Moreno Valley. For too long the city has built housing without concern for job development and that is a bad thing. The city needs new jobs and it needs an industrial tax. I have no idea if the Highland Fairview project is a good project, I as a resident, rely on you the city official, to determine that. I do know that the city needs development of industrial areas with a high-tech focus. We cannot afford continued failure to develop so that a few people can maintain "a rural view". The City needs jobs not rural views.

The form letter asks me to give you this info:
I have lived in Moreno Valley since 1986.
I am a single unmarried man with no children. I am an Attorney. I am not

Packet Pg. 1103

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CITY COUNCIL

12 JUL - 1 PM 2:01

own. Our economy has been ~~stagnating~~ stagnating as a result of too few jobs & not enough effort to bring more to our city. If we keep building houses without creating more jobs in this city then we will be compounding existing problems. Our people matter! This logistics center will help generate more millions in fees, giving the city more flexibility to fix the problems in the community. When you consider how many people have long commutes in this city, the people of Moreno valley need the new jobs that the World Logistics Center will create. Spending hours everyday trying to get to work is no way to spend a life. I have not had a job since the summer of 2014. I go to school (Vanguard University) in Costa Mesa. So I don't want to travel far for work also. How can I pay for school? Many many more people are in the same situations as I am.

I am tired of the condition that my city is in! I am jelous of the prosperity of the cities around me, and I am ready to change it!

The next generation deserves more. Believe that this community is fed up and will fight for what they want. We want the change that world Logistics Center will bring us!

Sincerely,

Stephanie Torres
Stephanie Jones

[REDACTED]
Moreno Valley, Ca 92553
Stephanie Torres

City Council of Moreno Valley
110 City Hall / Clerk's Office
14177 Frederick St.,
Moreno Valley, Ca 92553

June 6, 2015

CITY COUNCIL
MORENO VALLEY
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15 JUL 17 11:00 AM PHOTOK

I am writing to you today to ask that you work to make sure the World Logistics Center gets approval here in Moreno Valley. Please back this project. I have lived in Moreno Valley for my entire life, 21 years. I don't have any children, & unfortunately I am still looking for a job. This is why I support the World Logistics Center, because I along with many other young adults struggle to begin their adult life because there is little opportunity for us here in this city. I am involved in this community through church activities allow me to have many opportunities to see how needy this community is. I want to believe that you have this area's best interests in mind, so I ask for your support of this logistics project. The World Logistics Center provides Moreno Valley with the opportunity to make huge and very needed changes to the city, making it a better place to live & work. I have not had to travel for for work, however the only jobs I have been able to get were jobs that did not allow me to get better occupational opportunities or even better myself. There is such little benefits Moreno Valley can bring a person in the condition it is now in. This project will bring a ton ~~of~~ of jobs to the area for all sorts of people. We have the land available & our community is more than willing to work. We want more for ourselves! We can no longer allow our residents a decreased quality life because of ~~community~~ commuting or unemployment. We can no longer allow our residents to spend their hard

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CITY COUNCIL

18 JUL - 6 PM 5: 17

-2-

home tired and sometimes exhausted - not wanting to participate in local events or volunteering because of this commute. I don't want this for my four kids - who are all degree and about to launch their careers elsewhere because there are no jobs here. They love their community but cannot afford to live here.

We need a community that is self sustaining, where the community can live work and support their city. make this project will allow this - bring a healthy tax base to support our police, fire dept and to keep our local roads well paved.

I'm an engineer and I'm convinced that the environmental issues and concerns are effectively being address. I don't believe our air quality would be effected by this project any more than the people who have to be and stay on these roads because they commute.

CITY COUNCIL
MORENO VALLEY
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15 JUL -6 PM 5: 17

5/9/15

City Council of Moreno Valley
c/o City Hall / Clerk's Office
14177 Frederick Street,
Moreno Valley, CA 92553

Attention Councilmembers:

I'm writing this letter to express my support of the World Logistic Center project. I support this project because of the desperate need for good paying jobs ^{to help} our citizens in the community, many who have to travel many miles to work and are away from the community most of the day, like myself. We have a good city, but it could be much better if our responsible citizens who commute everyday to work could support our city as many other cities have benefited from.

I'm a Moreno Valley resident for 27 years. I work in the LA Area and commute over 140 miles - for 27 years! I spend nearly six hours commuting and living.

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MORENO VALLEY

school events for our children and a lot more. I think that The World Logistics Center project will be a big blessing for the Moreno Valley community because it will be the opportunity to many family members to work in town and spend quality time with their family members. The tax revenue will help our city providing funds for the making of beautiful parks and recreation centers for our young children to enjoy.

Aminda L. Sales

[REDACTED]
[REDACTED]
Moreno Valley, CA 92555

15 JUL -7 PM 5: 00

5-25-2015

City Council of Moreno Valley
C/o City Hall/Clerks Office
14177 Frederick St. M.V., CA. 92553

My name is Annida H. Sales,
I have lived in Moreno Valley
since 2006. I am a mother of
two beautiful children. My
oldest is twenty two years
old and my youngest is ten
years old. I work as an
instructional assistant for
severely handicapped students.
A job which I really enjoy
doing. I am a person who
loves God and loves to work
in church. I am very active
at my church.

I am very blessed because
I have a job in Moreno Valley,
therefore, I do not need to
commit to go to work although my
husband does commute to Los
Angeles every day. He has been
commuting since 2006 making it

CITY COUNCIL
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be better.

Thank you for your time
Sincerely -

Jaime A. Godinez

Jaime A. Godinez



Moreno Valley CA, 92553

15 JUL -7 PM 5: 00

May 22, 2015

City Council Moreno Valley
c/o: City Hall / Clerks Office
14177 Frederick st
Moreno Valley, CA 92553

To the Council members of Moreno Valley.

My name is Jaime A. Godinez and I lived here in this city of Moreno Valley for 23 years. My occupation is unemployed cause of lack of job sites. I participate with the community in events with my church and also sports. My family had to commute outside of Moreno Valley to find jobs because of the lack of jobs here in Moreno Valley. I support the World Logistics Center because it will bring open doors to our community and our families for jobs that we need in this city and business. We the community want this project to happen and we support it cause we need something better for us and this city, we don't want to travel far from our home to go support other cities cause they have better

City of Moreno Valley

June 6, 2015

City Council Members

City Planning Commission

Community & Economic Development Department

1477 Fredrick Street

PO Box 88005

Moreno Valley, CA 92552

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JUN 10 2015
CITY OF MORENO VALLEY
Planning Division

Ref: Final Programmatic Environmental Impact Report, (World Logistics Center Project)

Having received and reviewed the above mentioned report I was amazed to find out that the already significant proposed impacts to my property were increased by 25%. The purpose of an environmental report is to attempt to minimize the project impacts to adjoining properties, not to increase the impacts. I am speaking specifically about the building height limitations being increased along Gilman Springs Road from a "Draft EIR" height of 60 feet to 80 feet high in the Final Programmatic EIR, (Aesthetics, Section, 4.1-63 middle of last paragraph). This change will block the already proposed impacted views from my house on Gilman Springs Road and those of the other homes in the Moreno Knolls Homeowners Association.

Just because these properties are outside of the limits of Moreno Valley does not give the City or developer the right to ignore our rights or the impacts to our properties with no attempts of mitigation. The City ignoring the rights of those outside of the City by not treating them equally to those properties within the city limits is a clear violation of EPA's Environmental Justice, **"EPA's goal is to provide an environment where all people enjoy the same degree of protection from environmental and health hazards and equal access to the decision-making process to maintain a healthy environment in which to live, learn, and work."** This is only location where the perimeter height is above 60 feet. Even the adjoining San Jacinto Wildlife Area has limits of 60 foot building heights plus a 400 foot landscaped setback. I would like to have the same consideration as the other species adjoining this proposed project.

My house, **(14670 Gilman Springs Road)** is closer to the proposed project than any other property on Gilman Springs Road yet no noise impact study was performed on that location for this project. I also wrote two letters, one on March 13, 2012 and another on April 5, 2013. Only the first letter appears in the report and the responses to both letters were nonexistent or sketchy at the best; not addressing the issues.

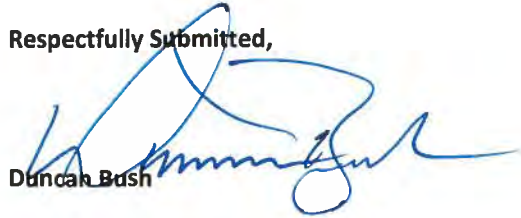
This also is a significant impact to the designated "Scenic" Gilman Springs Road and increases this impact. The EIR writers are aware that this is the case, yet there is also no mention of increased impacts to the adjoining Moreno Knolls neighbors are mentioned, (like we don't exist).

This project is in the wrong location and has significant cumulative failures in so many areas that I am unable to adequately respond to them all. Placing a project of this size with the truck traffic that comes with it should have been located along an Interstate Highway not a State Highway. Federal funding for such things as freeway widening, interchanges and maintenance, flow easier to the Interstate System than the State Highway System.

More than 70 percent of the commuters from Moreno Valley use Route 60 not the I-215. Why do we want this here and not East of I-215 as outlined in the existing general plan?

Please enter this letter into the public records of both meetings of the City Planning Commission and the City Council.

Respectfully Submitted,



Duncan Bush

[Redacted]

Moreno Valley, CA 92555

[Redacted]



Serious Drought.
 Help save water!

DEPARTMENT OF TRANSPORTATION

DISTRICT 8
DISTRICT DIRECTOR (MS 1201)
464 WEST 4th STREET, 6th FLOOR
SAN BERNARDINO, CA 92401-1400
PHONE (909) 383-4055
FAX (909) 383-6239
TTY 711
www.dot.ca.gov/dist8

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JUL - 1 2015
CITY OF MORENO VALLEY
Planning Division

June 25, 2015

City of Moreno Valley
Planning Department
Attention: Mark Gross, Senior Planner
14177 Frederick Street
Moreno Valley, CA 92553

Final Programmatic EIR for the proposed World Logistics Center

Dear Mr. Gross:

The California Department of Transportation (Caltrans) appreciates being provided a copy of the Final Programmatic EIR – Revised Draft Environmental Impact Report (FEIR) prepared for the World Logistics Center. As the owner and operator of the State Highway System (SHS), Caltrans has the responsibility to coordinate and consult with local jurisdictions and Tribal Governments when proposed local land use planning and development may impact these facilities.

Caltrans advocates community design (e.g., urban infill, mixed use, transit oriented development) that promotes an efficient transportation system and healthy communities. Caltrans seeks to reduce vehicle trips associated with proposed new local development and recommends appropriate mitigation measures that address the remaining transportation impacts of such development. Caltrans supports local development that is consistent with state planning priorities "intended to promote equity, strengthen the economy, protect the environment and promote public health and safety..." (Government Code [GC] 65401.1).

In consideration of both the scale of development that is proposed and the Level of Significance conclusions provided on Page 4.15-253 of the FEIR, the Department requests a Condition of Approval be placed on the World Logistics Center project to fund fair share improvements to the State Highway that are impacted by this development. Even with implementation of the Mitigation Measures 4.15.7.4.A through 4.15.7.4G, and implementation of all the improvements identified in Tables 4.15 ATV through 4.15 BAB, direct and cumulative impacts on study area roadway segments, intersections and freeway facilities would not be reduced to less than significant levels, including all improvement locations outside the City of Moreno Valley.

The FEIR repeatedly discusses, with some wording variations, in the Traffic and Circulation Section 4.15 on Pages 203, 207-208, 223-233, 242 and 243 that because the Freeway is outside the jurisdiction of the City of Moreno Valley and no mechanism is in place for ensuring the availability of the non-project portion of the needed funds that the City cannot ensure that the

Mr. Gross
 June 25, 2015
 Page 2

identified improvements would be made. Therefore, the project's impacts must be considered significant and unavoidable. However, the City can still ensure that fair share fees are collected related to this development of regional significance which could only be later used to mitigate this project's impacts.

This future fee should be the responsibility of the City of Moreno Valley to collect and should apply to situations where the project contributes to degraded safety, air quality and congestion.

The Freeway segments specifically identified in the Traffic and Circulation portion of the FEIR that are expected to experience worsening conditions are as follows:

- Eastbound SR-60 from Euclid Avenue to Grove Avenue
- Eastbound SR-60 from Martin Luther King to Central Avenue
- Westbound SR-60 from I-215 to Day Street
- Westbound SR-91 from Pierce Street to Magnolia Avenue
- Westbound SR-91 from Magnolia Avenue to La Sierra
- Eastbound SR-91 from Central to 14th Street
- Northbound I-215 from SR-74/Case Road to Redlands Boulevard
- Southbound I-215 from Case Road to Redlands Boulevard
- Southbound I-215 from Baseline Road to Highland Avenue
- Eastbound SR-60 from SR-91 to W. Blaine Street/3rd Street
- Eastbound SR-60 from W. Blaine Street/3rd Street to University Avenue
- Eastbound SR-60 from Central Avenue to Fair Isle Drive/Box Springs Road
- Eastbound SR-91 from Arlington Avenue to Central Avenue
- Westbound SR-91 from 14th Street to University Avenue

In addition to Freeway Mainline impacts, we request that fair share fees be provided to address the following other State facilities as well:

- SR-60/Gilman Springs Interchange
- SR-79 and Gilman Springs Interchange

For the reasons above, we request a Condition of Approval be placed on the World Logistics Center such as following:

“The developer shall fund a study that will be participated in by the City of Moreno Valley, Riverside County Transportation Commission and Caltrans to develop a fair share contribution to making mainline improvements to Freeway segments and interchanges that are expected to be significantly impacted by the World Logistics Center (such as SR-60, I-215, SR-91 and Gilman

Mr. Gross
June 25, 2015
Page 3

Springs Road Interchanges). The plan should include fair share contributions that would be based on the nexus requirements contained in the Mitigation Fee Act (Govt. Code Section 66000, et seq.) and 14 Cal. Code Regulations. Section 15126.4(a) (4). The plan would also be compliant with Government Code Section 66001(g) and other applicable provisions of law. The plan would set forth a time line and other agreed upon relevant criteria for implementation of the improvements recommended in this FEIR. Once the plan is approved, the City shall impose the fair share fees on each project that is developed under the World Logistics Center as part of the individual review of each development project. Prior to adoption of the Study, the City shall impose a fair share payment requirement on each development project within the World Logistics Center Specific Plan in accordance with the requirement of the Mitigation Fee Act. Required fair share payments shall be made prior to the issuance of Occupancy Permits for each requested development.”

In regard to the FEIR’s discussion of measures to address significant traffic impacts we request that the content regarding Eastbound SR-60 from Gilman Springs Road to Jack Rabbit Trail (F-36) on page 4.15-242 of the FEIR) and the content regarding Eastbound SR-60 from Jack Rabbit Trail to Potrero Road (F-37) on Page 4.15-243 of the FER) be revised to clearly explain that neither of the two projects were developed to address traffic impacts from the proposed World Logistics Center. As explained in the respective Environmental Documents prepared for the SR-60 Truck Climbing Lane and the State Route SR-60 Potrero new interchange, these projects were developed to address different needs (safety and local access).

Caltrans also recommends that the City in coordination with the Riverside Transit Agency locate conceptual transit stops within the specific plan due to the expected employment of 20,000 people within the project area. To reduce Vehicle Miles Traveled (VMT) and Greenhouse Gases, which are the primary goals of the 2040 California Transportation Plan (2040 CTP), we also recommend that things like preferential parking for vanpools and carpools be addressed in both the Specific Plan and the future site plan approvals. Bicycle and pedestrian facilities should also be provided both conceptually in the specific plan and through the site plan approval process.

Please feel free to contact me concerning this information at (909) 383-4557.

Sincerely,



JOHN BULINSKI
Interim District 8 Director

c: Juan C. Perez, Director, County of Riverside, Transportation and Land Management
Anne Mayer, Executive Director, Riverside County Transportation Commission

Grace Espino-Salcedo

Subject: RE: comments on WLC

From: Greg Ballmer [REDACTED]
Sent: Saturday, July 04, 2015 10:28 AM
To: Mark Gross
Cc: Jesse L. Molina; Jeffrey J. Giba; George Price; Dr. Yxstian A. Gutierrez; D. LaDonna Jempson
Subject: comments on WLC

Mark Gross, Moreno Valley Planner
 City of Moreno Valley

Dear Sir: Please include the following comments in the public record for the public review of the World Logistics Center project (WLC).

I oppose the proposed World Logistics Center project (WLC) and urge you to deny its approval. I present some of my reasons for opposition below.

I am a long time resident of Riverside and have watched as Moreno Valley evolved from the small rural and agricultural communities of Edgemont and Sunnymead to the sprawling bedroom community (largely for Orange County) it is today. While most major cities grow up around sources of primary economic activity, most Moreno Valley residents have always (at least since incorporation) depended on job centers many miles away. As the population has grown, the commuter transportation capacity has always lagged behind demand and is already essentially maxed out, at least during the morning and afternoon "rush hour" periods. And, of course, traffic congestion is so much worse when traffic collisions occur in and around the SR-60/I-215 and SR-91/I-215 interchanges; I note that such collisions seem to be getting ever more frequent. Prospects of increases in truck and commuter traffic (and inevitable highway collisions) associated with the WLC project should give local residents nightmares. It gives me nightmares, and I would be affected less than Moreno Valley residents.

Traffic congestion would worsen

Any notion that increased jobs provided by the WLC may reduce local commuter traffic in and around Moreno Valley is unrealistic. Even if the wildly optimistic projections of jobs associated with the WLC were to occur, that would not decrease long-distance commuter traffic. It is reasonable to assume that jobs in Orange and Los Angeles County, which may be vacated by Moreno Valley residents to work nearer their homes in Moreno Valley, will be filled quickly by others, who are also likely to seek more affordable housing in Moreno Valley. The end result is ever more commuter traffic, not less.

Economic uncertainty

In considering the proposed World Logistics Center project, it would be wise to consider the implications to the city's economic future. The commitment of such a large portion of remaining space (almost 41 million sq-ft) available for development in the City of Moreno Valley to a single industry sector (warehouses), whose economic success in turn depends on the expansion of trans-Pacific trade indefinitely into the future, is a risky

Attachment: CC Public Comments (combined) (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A

gamble. Post World War II trans-Pacific trade has grown more-or-less steadily as first Japan and Taiwan, then Korea, followed by China, and now Viet Nam, Cambodia, and Bangladesh have succeeded each other in hosting the production of consumer goods once produced in the USA. But, as those Third World countries have benefitted from the overseas flow of US dollars, they have continued to develop, with consequent increased labor costs and factories moving to ever cheaper labor sources.

Considering the economics of production, and the proclivity of manufacturers to seek ever cheaper labor, it is only a matter of time before factories leave Asia and head for the last frontier of cheap labor: Africa. Chinese entrepreneurs are already heading in that direction. And when the majority of consumer trade shifts to Africa, trans-Pacific trade will decrease, and all that local warehouse space may be unneeded, like a stranded whale on the beach. Perhaps it would be wise to plan ahead for that eventuality and adopt a sound and prudent strategy to plan for a more diversified economy.

Sincerely, Greg Ballmer

██████████
Riverside, CA 92504

C:

Jesse L. Molina

Jeffrey Giba

George Price

Yxstian Gutierrez

LaDonna Jepson

Mark Gross

Senior Planner

Community Development

City of Moreno Valley

p: 951.413.3215 | e: markg@moval.org w: www.moval.org

14177 Frederick St., Moreno Valley, CA 92553

Grace Espino-Salcedo

Subject: RE: WLC

From: keith king [REDACTED]

Sent: Tuesday, July 07, 2015 1:03 PM

To: Jesse L. Molina; Jeffrey J. Giba; George Price; Dr. Yxstian A. Gutierrez; D. LaDonna Jempson; Mark Gross; [REDACTED]

Subject: WLC

My name is Keith King, and I live at the east end of MoVal, and I urge you to vote NO on the world logistics center. I have COPD, and the added pollution would be very bad for my breathing. I have lived here sense 1975, and don't really want to move, so PLEASE vote NO, WE DO NOT NEED ANY MORE WAREHOUSES.

Thanks: Keith King

Attachment: CC Public Comments (combined) (1570 : WORLD LOGISTICS CENTER PROJECT INCLUDES A GENERAL PLAN AMENDMENT, A

Grace Espino-Salcedo

Subject: RE: Comments on proposed World Logistics Center

From: Robert [REDACTED]
Sent: Saturday, July 04, 2015 9:06 PM
To: Mark Gross
Subject: Comments on proposed World Logistics Center

Dear Mr. Gross,

Thank you for this opportunity to express my views on the proposed World Logistics Center.

I am very concerned that the Center, with its enormous size equivalent to 700 football fields of high-cube warehousing, will deeply degrade the quality of our environment in Moreno Valley and, particularly, of the air that we all must breathe. According to the Final Environmental Impact Report, the WLC will be visited by at least 14,000 truck trips and thousands of other vehicle trips *per day*. While the quality of our air has improved in recent years (thanks in large part to governmental regulations), we still have some of the worst air quality in the nation during warm weather periods. We frequently exceed federal standards for ozone and particulates. The diesel particulates that would be emitted by the enormous number of trucks have been shown in many studies to cause cancer, heart, and other health problems.

As a teacher in the Moreno Valley Unified School District for 16 years, I have seen many cases of asthma among my students. I am deeply concerned about the effects of the degraded air quality on the health of students who live on the East side of Moreno Valley and near our freeways, many of whom enjoy playing outside during the summers. The MVUSD has expressed its concerns about the environmental effects of the project. Elderly residents and those with a variety of health problems could also be subject to a worsening of their conditions by having to breathe more polluted air. Comments from experts at the South Coast Air Quality Management District express their view that the FEIR unduly minimizes the effects of the emissions from so many diesel trucks.

As we all know, the developer is attempting to sell the project on the basis of projected major economic benefits to our community. Given the high degree of automation and frequent reliance on part-time and low-wage workers in the logistics industry, there is substantial justification for viewing the job-creation and economic-benefit claims with considerable skepticism. The number of local jobs created by the Skechers plant has been very small. If many warehouses brought so large economic benefits, then Mira Loma and Fontana should be models of prosperity (which they aren't). The proponents of the WLC can promise enormous rewards, but, if those don't materialize, what then? We will be stuck with all of the problems but without the promised benefits.

There are already many warehouses on the South side of our city and along the 215. Do we need to additionally have this massive development on our East edge, making us the warehouse capital of inland Southern California?

The WLC also raises serious issues about traffic congestion, with so many additional truck trips and visits by other vehicles to that location. These trucks will be clogging our freeways through Riverside and other neighboring communities. This becomes a regional issue, not just a local one. Also, what about effects on transitions on and off of the freeway near the WLC? In addition, with so many additional truck trips there will be inevitable spillover of drivers directing their rigs through streets that aren't designated truck routes.

The argument doesn't have to come down to a choice between a growing local economy and the quality of our air and environment. We can have both, if we aggressively work to attract and develop employers that provide local jobs without further endangering our health. Opportunities in health care, renewable energies, and manufacturing could be examples of fields that would generate employment without all of the problems of warehouses. We should have a community dialogue about the future of Moreno Valley, its economy, and what types of businesses and industries we want here. We could examine the approaches of other California cities that have been successful in growing their economies in an environmentally healthy manner.

Sincerely,

Robert Willson



Moreno Valley, CA 92552

MEMORANDUM

DATE: June 10, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to Letter from CARB dated June 8, 2015**

In a letter dated June 8, 2015, Heather Arias with the California Air Resources Board (CARB) submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

Comment 1:

ARB reviewed the Draft Environmental Impact Report (DEIR) and provided comments to the City of Moreno Valley (City) in a letter dated April 16, 2013. ARB's comment letter expressed concern over the increase in health risk in the immediate area and the significant and unavoidable air quality and greenhouse gas related impacts caused by the proposed WLC. To address those concerns, ARB recommended actions to support the development, demonstration, and deployment of zero and near-zero emission technology at the WLC.

Unfortunately, ARB finds the FEIR to be legally inadequate and unresponsive to the comments ARB provided in its April 16, 2013 letter regarding the DEIR. ARB appreciates the opportunity to comment on the FEIR, as we have significant concerns with the analysis and mitigation currently outlined in the document. We urge the City to revise and recirculate the EIR, to reflect needed changes in mitigation and to bolster the analysis of potential health risks posed by the project, as required by California Environmental Quality Act (CEQA).

Response 1:

The air quality, health risk, and greenhouse gas analyses in the EIR are based on current scientific and regulatory guidance on the preparation of such studies, are legally adequate, and the EIR proposes appropriate mitigation based on the impacts identified in those studies. The EIR contains accurate and legally adequate information upon which decision-makers can make an informed decision. As outlined in Table 1.C of the Final EIR – Volume 1 – Response to Comments, recirculation is not necessary based on the results of the additional analyses and responses to the many comments on the Draft EIR.

Comment 2:

In addition, we are aware of the possibility that the City may opt to move the WLC decision to a ballot measure. Given the potential emissions impacts and increase in health risk associated with project construction and operation, we strongly urge CEQA compliance by the City, irrespective of whether or not this project becomes a ballot measure.

Response 2:

DEIR Section 4.4 fully evaluated the potential air quality and health risks of the WLC project. The many comments on the DEIR regarding air quality and health risks were addressed in Volume 1 of the Final EIR – Response to Comments.

Comment 3:

CEQA Background Regarding Responses to Comments and Need for EIR Recirculation. When a significant environmental issue is raised in comments that object to the draft EIR's analysis, the response must be detailed and must provide a reasoned, good faith analysis. (14 CCR § 15088(c).) The responses to comments on a draft

EIR must state reasons for rejecting suggestions and objections concerning significant environmental issues. (City of Maywood v. Los Angeles Unified Sch. Dist. (2012) 208 Cal.App.4th 362, 391.) The need for a reasoned, factual response is particularly acute when critical comments have been made by other agencies or by experts. (See Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs (2001) 91 Cal.App.4th 1344, 1367,1371.).

If significant new information¹ is added to an Environmental Impact Report (EIR)² after notice of public review has occurred, but before final certification of the EIR, the lead agency must issue a new notice and recirculate the EIR for comments and consultation. (Pub. Res. Code § 21092.1; 14 CCR § 15088.5.) "Significant new information" triggering the need for EIR recirculation includes information showing that (1) a new or more severe environmental impact would result from the project, (2) a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of a project but the project proponent declines to adopt it, or (3) the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (14 CCR § 15088.5(a)(1)-(4).)

A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record. (14 CCR § 15088.5(e).)

Response 3:

The comment above describes requirements of CEQA in regard to response to comments and recirculation. The FEIR for the WLC project meets the requirements of CEQA in regard to response to comments. In addition, the FEIR does not meet any of the criteria for recirculation: (1) there are no new or more severe environmental impacts, (2) there are no feasible project alternatives that would lessen the environmental impacts and all feasible mitigation has been adopted, and (3) it is neither inadequate nor conclusory.

Comment 4:

The Response to Comments Fails to Adequately Address ARB's Comments And Does Not Adopt All Feasible Mitigation Measures. In its previous comment letter, ARB recommended "actions to support the development, demonstration, and deployment of zero and near-zero emission technology to reduce localized health risk and regional emissions. We believe that use of these technologies is feasible within the build-out years of the Center." However, the FEIR discussion (in particular, responses to comment B-5-7 and B-5-8 and Master Response 3) regarding zero emission and hybrid electric trucks, vehicles, and equipment does not evaluate the current feasibility of hybrid technologies, or consider the potential for other zero and near-zero emission technologies to be feasible and commercially available, both at the present date and by project build-out in 2030. These technologies are feasible measures that would lessen the WLC's impacts on criteria and greenhouse gas emissions, as well as air toxics and health risk.³

Because these mitigation measures have not been fully adopted for the proposed project, the EIR must be recirculated to incorporate the feasible mitigation measures, or to make a supportable finding that the measures are infeasible. (See 14 CCR § 15088.5(a)(3).)

¹ "Information" triggering recirculation can include additional data or other information. (14 CCR § 15088.5(a).)

² Note that even if new information is not "added to an EIR," it can still trigger the need for recirculation. (See, e.g., Save Our Peninsula Comm. v. Monterey County Bd. of Supervisors (2001) 87 Cal.App.4th 99, 131 (information on important new mitigation measure, added to record after EIR was completed, should have been included in EIR and circulated for public review and comment given questions raised about its effectiveness and potential impacts).)

³ For the purposes of CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. (California Code of Regulations, title 14, section 15364)

Examples include battery electric and fuel cell electric forklifts, battery electric and hybrid electric medium-duty trucks, and plug-in hybrid electric transportation refrigeration units. For more information, please see ARB's Heavy-Duty Technology and Fuels Assessment: Overview, found at http://www.arb.ca.gov/msprog/tech/techreport/ta_overview_v_4_3_2015_final_pdf.pdf.

However, the FEIR discussion (in particular, responses to comment B-5-7 and B-5-8 and Master Response 3) regarding zero emission and hybrid electric trucks, vehicles, and equipment does not adequately evaluate the current feasibility of hybrid technologies, or consider the potential for other zero and near-zero emission technologies to be feasible and commercially available, both at the present date and by project build-out.

The response to comment B-5-7 states that "the project will support a variety of future users which are unknown at this time so it is not possible to specify or require future users to have zero emission or alternative fuel fleets since most logistics companies use independent contractors and truck drivers rather than maintain their own fleets." This response is contradictory and insufficient to show that the proposed mitigation measures are infeasible. This is particularly true given the FEIR's inclusion of several requirements that are applicable to all future tenants; specifically, that all medium and heavy-duty diesel trucks entering logistics sites shall meet or exceed 2010 engine emission standards and all yard trucks shall be powered by electricity, natural gas, propane, or an equivalent non-diesel fuel. If the mitigation measures can restrict access to the facility by truck engine year, there is no reason the mitigation measures cannot similarly restrict access by allowable technologies.

Furthermore, the response to comments rejected the proposed measure of requiring that trucks travelling between the project and any ports or rail yards within 100 miles use zero or near zero emission technology. The reasons for rejecting this measure are also unclear. The response to comments notes that "the Port of Los Angeles is testing various types of zero-emission technology solutions for heavy-duty vehicles," which the response to comments explains have a "range of travel between 100 miles and 200 miles per charge." (WLC Response to Comments at 234.) Therefore, it remains unclear why a measure requiring zero or near zero emission trucks for trips within 100 miles of the project would not be feasible, particularly by project build out in 2030.

With regard to onsite service vehicles and equipment, the response to comment B-5-8 further notes that the only included mitigation measure incorporated into the FEIR is prohibiting the use of diesel-powered onsite vehicles and equipment. (WLC Response to Comments at 185.) Again, the reasons for not including mitigation measures for these onsite vehicles remain unclear, since the response to comments does not clearly address why these types of vehicles and equipment are not available in zero or near-zero emission configurations.

The EIR should therefore be revised and recirculated to do the following:

- Fully evaluate mitigation measures for zero and near-zero emission technologies that are commercially available over the course of project development and by full build-out in 2030.
- Require all feasible mitigation measures and support the development, demonstration, and deployment of zero and near-zero emission technologies including requiring zero emission (such as battery electric or fuel cell electric) forklifts and battery electric and hybrid electric medium-duty trucks. These technologies are commercially available today. Additional advancements, especially for on-road trucks, are expected in the next three to five years; well before project build-out in 2030.

Response 4:

The WLC Project FEIR is a programmatic EIR that analyzes the environmental impacts and require mitigation for a long-term project that will be implemented in increments over many years. Each subsequent increment will be subject to further environmental review and may require additional mitigation if additional impacts are found or previously infeasible mitigation becomes feasible. Due to the programmatic nature of the document, it is not known who future users of the WLC will be or what their operational needs will require in terms of

equipment. As a result, all mitigation relies on commercially available technology that meets the most stringent environmental standards. As CARB knows, planning for zero-emission technology in the freight sector is incredibly difficult, as demonstrated by CARB's ongoing multi-year planning (not implementation) effort to on the Sustainable Freight Plan to lay out pathways to get to a zero-emission freight sector.

As CARB knows, there are no commercially available zero-emission on-road heavy-duty trucks available (See RTC Master Response-3). CARB's own progress report on heavy duty technology and fuels assessment (Draft Heavy-Duty Technology And Fuels Assessment: Overview, April 2015) overview states that the zero and non-zero emission technologies are still at the demonstration phase:

“Demonstrations are underway across the State in a wide array of heavy-duty applications including drayage trucks, delivery trucks, school buses, and some types of off-road equipment.”

“Achieving the successful transition to zero and near-zero emission technologies will be challenging and will take time and money to realize.”

“Staff is assessing additional zero emission vehicle and equipment platforms in the concept, demonstration, or pilot scale deployment stage in the heavy duty sector. Examples include drayage trucks, delivery trucks, and selected types of cargo handling equipment (CHE) such as yard trucks. These technologies are limited today by cost and in some cases performance. As these technologies mature, moving from demonstrations to pilots and early commercialization, costs will decrease and performance will improve.”

Not only are none currently available, it is not currently known when such trucks will become available, what technology they will rely (an important requirement for refueling/recharging requirements), or what operational capabilities such equipment might have such as range or load. The project can commit to requiring all trucks meet U.S. EPA 2010 standards (Mitigation Measure 4.3.6.3B) because it is not question of commercial availability – all new trucks must meet these standards – it is a question of what subset of the truck fleet will serve the WLC.

Similarly with off-road equipment, there is no zero-emission standard for such equipment. While some electrical equipment does exist, it does not exist in for all operational requirements. However, all onsite equipment is available in non-diesel technologies. Subsequent environmental review may require that specific technology that will work with future users be required as condition of approval, but a broad requirement that unknown future users use a specific technology is not currently feasible since current zero-emission technology is very limited.

Comment 5:

Recirculation Is Required Due To Fundamental Inadequacies in the Project's Health Risk Assessment. Several elements of the health risk assessment section of the FEIR are flawed and inadequate, and require revision and recirculation. As noted above, one of the circumstances triggering the need for EIR recirculation is the addition of information showing that the EIR was fundamentally inadequate and conclusory in nature that meaningful public review and comment were precluded. (14 CCR § 15088.5(a).)

In this case, this recirculation “trigger” is present. The FEIR analysis has been revised since the draft EIR was released to include a new study regarding health impacts from diesel engines, specifically, the Advanced Collaborative Emissions Study (ACES). The FEIR repeatedly references that the ACES study concludes that the “application of new emissions control technology to diesel engines have virtually eliminated the health impacts of diesel exhaust.” First, the use of only one study as the basis for this analysis is not sufficient for the purpose of providing a comprehensive analysis of health risk from project construction and operations. The ACES study is only one of many scientific studies related to health risk and emissions, and therefore, cannot serve as substantial evidence regarding the project impact to human health. In fact, there are many other studies that conclude that diesel particulate matter (PM) is a health hazard. For example, the International Agency for Research on Cancer evaluated the scientific literature as a whole and concluded in 2012 that diesel PM is

carcinogenic to humans (class 1). Second, and more importantly, the ACES study's methodology and findings render it inadequate for inclusion in an environmental document, and cannot serve as substantial evidence supporting a finding that the project will not result in significant cancer risk impacts.⁴ Therefore, use of and reference to the ACES study should be removed throughout the FEIR.⁵

Further, the air quality and health risk methodology and models used in the FEIR should be fully explained to ensure the information is accessible and understandable to the public. Specifically, the final document should include the presentation of all cancer and non-cancer health risks at the receptor locations of interest for all emissions from construction and operations at the WLC. The methodology should include the use of all the current Office of Environmental Health Hazard Assessment (OEHHA) approved risk assessment methodology contained in the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for the Preparation of Health Risk Assessments (February 2015).

Response 5:

The HEI is an independent non-profit research organization founded in 1980 to provide high-quality, impartial, and relevant science on the health effects of air pollution. Typically, HEI receives half of its core funds from the US Environmental Protection Agency and half from the worldwide motor vehicle industry. Other public and private organizations periodically support special projects or certain research programs. Organizations also participate as part of steering committees and peer reviewers including the California Air Resources Board and the Natural Resources Defense Council, among others.

It is important to note that the primary purpose of ACES, on which CARB was a member of the steering committee, was to evaluate the cancer risk from new technology diesel exhaust: “the first study to conduct a comprehensive evaluation of lifetime inhalation exposure to emissions from heavy-duty 2007-compliant engines” (HEI Statement p. 1).

While HEI ACES evaluated over 100 health endpoints, the FEIR only relied upon the report's conclusion in its discussion and analysis of cancer risk. The HEI ACES report was not relied upon in the FEIR's analysis of the chronic/acute hazard index or the mortality/morbidity analysis. In addition, CARB's comment requests that the approved risk assessment methodology contained in the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for the Preparation of Health Risk Assessments be used. A full assessment using those guidelines is provided in the FEIR. (FEIR Volume 3, Section 4.3.3.4) Based upon those guidelines, there would be no project-related cancer risk outside the project's boundaries. The FEIR concludes that based upon HEI ACES, that estimated risk is overestimated and that no cancer risk impact is expected from the WLC. The primary conclusion of the HEI ACES is “that NTDE would not cause an increase in tumor formation or substantial toxic health effects.” (HEI ACES Report p.3).

⁴ An EIR's CEQA significance findings must be supported by substantial evidence. “Substantial evidence” means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. (14 CCR § 15384(a).) Notably, argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, does not constitute substantial evidence. (Id.) In this case, the ACES study should not be used for the purposes of a CEQA analysis, as the exposure levels used in the ACES study were based on diluted NO₂ and not particulate matter and therefore actual exposure of particulate matter in this study is unknown. Additionally, during the lab exposure testing, two 2007 Detroit Diesel engines were used, one for a total of 10,090 hours and one for 4031 hours with oil changes at every 250 hours (250 hours = 5,000 miles). Therefore, the study results are based on the best-case scenario and did not account for potential real world wear and tear on diesel engines, poor maintenance, and failure rates of diesel particulate filters.

⁵ For more information regarding diesel engine exhaust health impacts, please see http://oehha.ca.gov/public_info/DEEposter.html.

Additionally, the study mentioned by CARB does not examine cancer health risk attributable to new technology diesel but have examined health effects from diesel trucks that emit between 10 to 100 times more emissions than the new technology that the project's mitigation will require. As ACES Phase 1 and 2 demonstrate, new technology diesel exhaust is substantially different from traditional diesel exhaust necessitating the HEI study to evaluate the health impacts of new technology diesel exhaust. All previous studies, including those evaluated by OEHHA and cited by CARB examined the health effects of traditional diesel exhaust which date back to research done in the 1990's and 2000's.

CEQA Guidelines Section 15088.5 states that "new information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect". The impacts described in the FEIR are similar to or less than the impacts described in the DEIR. New, though not significant, information added to the document responds to comments; merely clarifies or amplifies existing information; or adds new mitigation measures, any impacts of which have been fully evaluated in the FEIR. In addition, FEIR is neither inadequate nor conclusory

Comment 6:

Furthermore, we recommend the document include an evaluation of the potential health impacts at the major milestones identified for this project (e.g., beginning in 2015, 2022, and 2035) for each receptor of interest and appropriate exposure duration (i.e., resident would be 30 years). This analysis will allow the presentation of potential health impacts at key milestones and how the potential health risk estimates may change as the project is completed and the facility changes to full operation.

Response 6:

The OEHHA health risk assessment contained in the FEIR analyses the lifetime exposure as defined by OEHHA (30 years). (FEIR Volume 3, Section 4.3.3.4) Any period shorter than the lifetime exposure would show results less than those shown in the FEIR. While the OEHHA method overestimates the risk, based upon the conclusions of HEI ACES, it does show a worst case scenario with regard to duration. Further, as one moves into the future, the health impacts would be less than those described in the FEIR since emissions will be lower than in the early years of the project.

Comment 7:

Attainment of Federal Ambient Air Quality Standards. The FEIR determines that the proposed project would have significant long term air quality impacts. Specifically, the air quality analysis demonstrates that the project's operational nitrogen oxides (NOx) emissions far exceed the South Coast Air Quality Management District's significance threshold of 55 pounds per day. The projected rise in emissions of criteria pollutants may interfere with current strategy to bring the South Coast Air Basin into attainment with federal air quality standards. Given the level of impacts and the location in the South Coast Air Basin, the project needs to be revised to include substantial air quality mitigation by employing effective and feasible zero and near-zero emission technologies.

Response 7:

See Response to Comment 4. The FEIR has committed to require U.S. EPA 2010 compliant trucks well ahead of the State of California's requirements. There are no commercially available heavy-duty trucks and therefore such mitigation is infeasible. CARB's own planning efforts with regard to zero-emissions within the freight sector is incomplete. Additionally, without knowledge of who future users might be, it is not currently possible to specify what technology will meet their operational needs. Subsequent environmental review may require that specific technology that will work with future users be required as condition of approval.

Comment 8:

Use of Future Baseline in the Health Risk and Air Quality Analysis. Should the City re-circulate the EIR, ARB strongly recommends that the health risk and air quality analysis use both the existing conditions baseline (current conditions) and a future conditions baseline (full build out year, without the project.) This analysis will be useful to the public in understanding the full impacts of the project. Neighbors for Smart Rail v Exposition

Metro Line Construction Authority (2013) 57 C4th 439 confirmed that the lead agency has discretion on how to best define a baseline under the circumstances of rapidly changing environmental conditions. In this situation, the project site is located in a federal nonattainment area and is adjacent to residences; given the timeframe for full build out, those conditions may be significantly different from current conditions.

Specifically, it is important to analyze whether anticipated regional air quality improvements in future years as the result of State, federal, and local air quality programs, may be reduced or negated as the result of this project. For those reasons, it is important to ensure that the public has a complete understanding of the environmental impacts of the WLC, as compared to both existing conditions and future conditions.

Response 8:

The FEIR contains an exhaustive analysis of the impacts of the proposed project and the cumulative analysis shows the project's impacts when combined with the impacts of reasonably foreseeable past, present, and future projects. (FEIR Volume 3, Section 4.3)

Comment 9:

Charging Infrastructure to Support Zero and Near-Zero Emission Technology. Should the City re-circulate the EIR, ARB recommends including mitigation measures that detail more robust plans for charging and fueling infrastructure, which will be necessary to support increased zero emission vehicles and equipment used on the project site. Mitigation measure 4.3.6.3C indicates that one alternative fueling station will be publicly available prior to the issuance of building permits for more than 25 million square feet. This mitigation measure should include a more comprehensive description of the fueling station, including how that fueling station will adequately meet the needs of the zero and near-zero emission equipment used on site.

Furthermore, mitigation measure 4.3.6.4A indicates two electric vehicle-charging stations for automobiles or light duty trucks shall be provided at each building. The project description does not include an estimation of how many buildings are expected to be developed on site. While the FEIR does provide an estimation of the number of daily trips by passenger vehicles and light duty trucks (54,714 and 2,385 daily trips, respectively), mitigation measure 4.3.6.4A and the associated analysis does not contain an estimation of how many of those trips will be made by electric vehicles and does not provide enough information to evaluate whether mitigation measure 4.3.6.4A satisfies potential charging demand. Given Governor's Executive Order B-16-2012 target of reaching 1.5 million zero emission vehicles on California roadways by 2025 and the Governor's goal of cutting petroleum use in half by 2030, mitigation measure 4.3.6.4A should be expanded to ensure that the charging infrastructure required on-site will meet the needs of the growing numbers of zero emission vehicles that will be accessing the project site.

Response 9:

The project does not make an estimate of the number of electric vehicles arriving at the project because such an estimate would be pure speculation. The State of California has had a zero emission vehicle (ZEV) requirement for decades with little success. That is beginning to change; however, the rate of penetration for ZEV is unknown. As a result, the project is using the highest planning standards in setting a minimum for electrical charging stations. Since this is a programmatic EIR and there will be subsequent environmental evaluation as the project is implemented, it is possible that the electric vehicle charging requirements will increase due to changing real-world circumstances, rather than hopeful speculation. Finally as noted, the project requires that construction and operation of an alternative fueling station to encourage the use of alternative heavy-duty technologies.

Comment 10:

Statewide Air Quality, Climate and Health Drivers to Reduce Emissions from Freight Hubs. To achieve California's air quality, climate and sustainability goals, and to reduce the health risk from diesel PM in communities located near freight hubs, the State, including public and private partners, must take effective action to transition to a zero and near-zero emission freight system. This effort is laid out in ARB's Sustainable

Freight Pathways to Zero and Near-Zero Emissions Discussion Draft, which can be found at http://www.arb.ca.gov/gmp/sfti/Sustainable_Freight_Draft_4-3-2015.pdf.

Response 10:

As CARB notes in its comment, the Sustainable Freight Strategy is still draft and subject to change. In addition, the document acknowledges that much of the technology that CARB has recommended in its comment letter is still not commercially available.

Comment 11:

Given the scale of the project, the substantial increases in criteria pollutants and greenhouse gas emissions, as well as the potential impact to health risk, it is critical that the FEIR require the use of zero and near-zero emission technologies. Furthermore, the health risk analysis must be revised to ensure that the potential impacts are fully analyzed and disclosed. We would be pleased to provide assistance to help develop the analysis and mitigation measures to ensure that this state-of-the-art facility is able to serve the region's distribution needs, while protecting air quality and public health, as well as minimizing the project's contribution to greenhouse gas emissions. Please include ARB on any further notifications related to the WLC.

Response 11:

Please see previous Responses 1 through 10.

MEMORANDUM

DATE: June 29, 2015 updated

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to Letter from the Center for Biological Diversity and Audubon Society**

In a letter dated June 10, 2015, the Center for Biological Diversity and the Audubon Society submitted comments on the WLC Project FEIR. The specific comments are presented below followed by specific responses to each comment.

Comment 1:

These comments are submitted on behalf of the Center for Biological Diversity and San Bernardino Valley Audubon Society (collectively "Conservation Groups") on the World Logistics Center Project ("Project"), located south of Interstate 60 on the eastern edge of Moreno Valley. The Project would be the largest master-planned warehouse development in U.S. history, totaling approximately 40.6 million square feet on 2,610 acres. The Project would result in significant impacts to air quality contributing tons of criteria pollutants into an area currently designated as non-attainment under the Clean Air Act, poses a significant impact to climate change, and threatens the adjacent San Jacinto Wildlife Area.

The Final Environmental Impact Report ("EIR") fails to adequately describe the Project and the environmental setting, including the creation of a fictional "CDFW Conservation Buffer Area", which effectively removes over 1000 acres from the San Jacinto Wildlife Area ("SJWA") and core reserve lands under the Western Riverside County Multiple Species Habitat Conservation Plan ("MSHCP"). The FEIR also fails to analyze a range of environmental impacts, mitigation measures, and alternatives. At a minimum, the FEIR must be revised and recirculated to remedy these deficiencies. However, because of the permanent and irreconcilable conflicts with public health and environmental protection the Project should be denied.

Response 1:

See the following detailed responses.

Comment 2:

The Center for Biological Diversity ("the Center") is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center for Biological Diversity has over 900,000 members and e-activists throughout California and the western United States, including residents of western Riverside County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in the Inland Empire.

The San Bernardino Valley Audubon Society ("SBVAS") is a local chapter of the National Audubon Society, a 501(c)3 corporation. The SBVAS chapter area covers almost all of Riverside and San Bernardino Counties and includes the project area. It has about 2,000 members, about half of whom live in Riverside County. Part of our chapter's mission is to preserve habitat in our area, not just for birds, but for other wildlife, and to maintain the quality of life in the Inland Empire.

It is well established that the purpose of an EIR is to provide public agency decision-makers and members of the public with an informational document that explains potentially significant environmental impacts and feasible mitigation measures. (Cal. Pub. Res. Code §§ 21002.1, 21061; Guidelines §§ 15121, 15151; Vineyard

Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 426-27; *Carmel Valley View, Ltd. v. Board of Supervisors* (1976) 58 Cal.App.3d 817, 821-822.) An EIR must include the full range of potentially significant impacts, as well as reasonably prudent avoidance, minimization, and mitigation measures in the EIR to comply with CEQA's information disclosure requirements. (Pub. Res. Code § 21000 et seq.) CEQA requires the planning agency to "mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." (Pub. Res. Code §§ 21002.1(b); 15126.4.) Mitigation of a project's significant impacts is one of the "most important" functions of CEQA. (*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41.) Importantly, mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development." (*Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (quoting Pub. Res. Code § 21081.6(b)).)

Response 2:

The comment describes CBD and SBVAS and notes the requirements of CEQA.

Comment 3:

I. THE FEIR MUST BE RECIRCULATED FOR PUBLIC REVIEW AND COMMENT

The FEIR must be recirculated since it is based on outdated or inapplicable studies and data, and significant new information substantially changes the FEIR's analyses of the Project's impacts, alternatives and required mitigation, as we explain below. (Laurel Heights Improvement Assn. v. Regents of Univ. of Cal. (1993) 6 Cal.4th 1112, 1132 (Laurel Heights).)

Under CEQA, an EIR must be re-circulated for review and comment whenever significant new information becomes known to the lead agency and is added to the EIR, after public notice of the availability of the draft document has been made, and before the EIR is certified. (Pub. Res. Code § 21092.1.) Under such circumstances the lead agency is specifically required to re-notice the environmental review document to the public and all responsible agencies, and is required to obtain comments from the same, before certifying the document's impacts, its alternatives analyses, and any mitigation measures. (See id.; see also, Cal Pub. Res. Code § 21153.) A lead agency's decision not to recirculate an EIR must be supported by substantial evidence. (CEQA Guidelines § 15088.5(e).)

"Significant new information" includes any information regarding changes in the environmental setting of the project under review. (CEQA Guidelines § 15088.5(a).) It also includes information or data that has been added to the EIR and is considered "significant" because it deviates from that which was presented in the draft document, depriving the public from a meaningful opportunity to comment upon a significant environmental effect of the project, or a feasible way to mitigate or avoid such an effect at the time of circulation of the draft. (Id.) Some examples a lead agency must re-circulate an EIR for further public comment are:

- (1) When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigation measure;*
- (2) When the new information shows a substantial increase in the severity of an environmental impact, except that recirculation would not be required if mitigation that reduces the impact to insignificance is adopted;*
- (3) When the new information shows a feasible alternative or mitigation measure that clearly would lessen the environmental impacts of a project and the project proponent declines to adopt the mitigation measure; or*
- (4) When the draft EIR was "so fundamentally and basically inadequate and conclusory in nature" that public comment on the draft EIR was essentially meaningless. (CEQA Guidelines §15088.5.)*

Recirculation is thus required when the addition of significant new information that substantially changes the FEIR's analyses of the Project's impacts, alternatives and required mitigation. (Laurel Heights, 6 Cal.4th at 1132.) Accordingly, "[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal." (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 199 (citation omitted).)

Based on the comments below and our previous comments to the draft EIR, it is clear that the FEIR must be re-drafted and re-circulated. Conditions (1) and (2) above will be met by meaningful and adequate discussion of the Project itself and the project's impact to the following: biological resources which were excluded from review, analysis of greenhouse gas emissions, water supply and availability, and water quality. Specifically, comments on the EIR provide new information about the following: the EIR's attempt to mask impacts to property owned by the California Department of Fish and Wildlife ("CDFW"), failure to disclose impacts to hydrological and riparian/riverine resources, failure to analyze the impacts of wastewater mitigation basins and special status species placed in a buffer zone adjacent to the San Jacinto Wildlife Area, failure to analyze the substantial increase in impacts to wildlife corridors, and the failure to properly analyze significant impacts disclosed in comments, new biological reports, including impacts to raptor habitat. The FEIR also fails to take into account all potential sources of greenhouse gas ("GHG") emissions from the Project and then ignores large emission sources when completing the FEIR's significance analysis. The FEIR improperly relies on AB 32's Cap and Trade Program to fully minimize and mitigate nearly 400,000 metric tons of CO2 emissions at full build out of the Project, despite readily available and feasible GHG emissions mitigation measures that would lower the Project's overall GHG emissions and contribution to climate change. Additionally, the FEIR fails to adequately account for the unreliability of water supply for this Project due to unprecedented drought and climate change conditions, and thus fails to disclose and analyze Project impacts on water supply in light of ongoing and worsening water scarcity. Condition (3) will be met because the EIR fails to incorporate feasible mitigation measures or alternatives that were provided by the public and responsible agencies after the circulation of the EIR such as realignment drainage 9 or adopting burrowing owl relocation programs. The combined effect of these omissions makes it clear that the fourth condition has also been met. Failure to address these impacts is inadequate and requires further analysis and recirculation.

Response 3:

CEQA Guidelines Section 15088.5 states that "new information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect". The impacts described in the FEIR are similar to or less than the impacts described in the DEIR. New, though not significant, information added to the document responds to comments; merely clarifies or amplifies existing information; or adds new mitigation measures, any impacts of which have been fully evaluated in the FEIR. In addition, FEIR is neither inadequate nor conclusory. None of the changes that Center for Biological Diversity (CBD) describes in its comment meet the standard requiring recirculation. Changes to the document and the inclusion of new information is not the standard for recirculation, in fact, it is the public process of CEQA.

Comment 4:

II. THE PROJECT IS IMPROPERLY ANALYZED UNDER A PROGRAMMATIC EIR

The applicant should have prepared a project EIR instead of the current programmatic EIR for this Project. A project EIR is appropriately prepared for a "construction-level project, and 'should focus primarily on the changes in the environment that would result from the development project [and] examine all phases of the project including planning, construction, and operation.'" (Citizens for a Sustainable Treasure Island v. City and County of San Francisco (2014) 227 Cal.App.4th 1036, 1047 (quoting Guidelines § 15161) (Treasure Island); see also In re Bay-Delta etc. (2008) 43 Cal.4th 1143, 1169.) A programmatic EIR, on the other hand, "evaluates the broad policy direction of a planning document, such as a general plan, but does not examine the potential site-specific impacts of the many individual projects that may be proposed in the future consistent with the plan." (Treasure Island, 43 Cal.4th at 1047; see also Guidelines §15168.)

The “level of detail in an EIR is driven by the nature of the project, not the label attached.” (Treasure Island, 43 Cal.4th at 1051.) “An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan” (CEQA Guidelines § 15146.) Since this Project proposes to develop a business park where specific information is known for each aspect of the Project, (FEIR at 1-6, 1-7), it necessarily requires the preparation of a project EIR to assess and mitigate the impacts consistent with the degree of specificity of the activities proposed. (Treasure Island, 43 Cal.App.4th at 1051-52.)

Response 4:

Due to the level of information currently available about the WLC project, a programmatic EIR is the most appropriate CEQA compliance document at this time. The EIR clearly states that more detailed CEQA analysis will be performed once more specific project-level data and plans are submitted to the City for review (future site plans, plot plans, etc.) consistent with the programmatic WLC Specific Plan (FEIR Section 3.7.2 – City of Moreno Valley – Future Approvals, p. 3-114). The Draft Environmental Impact Report (DEIR) provides mitigation at a programmatic level, but does rely on implementation at the project level once specific development plans are submitted. The DEIR mitigation measures contain sufficient performance standards so that mitigation of project impacts is not deferred but rather will be applied to future discretionary permit applications, including obtaining permits as appropriate (e.g., Streambed Alteration Agreements for onsite drainages), see MM 4.4.6.3C.

CBD’s discussion of the difference between a programmatic document and project-level document perfectly describes the WLC Specific Plan Programmatic FEIR. The project under consideration is a specific plan that serves as planning document, no project-specific information is currently known. At this time, no plot plans are being considered, future tenants are not known, and building sizes for future tenants have not been established. In short, the necessary information for a project-level document will be known when the first plot plan is proposed. The size, number, and location of buildings are unknown at present.

Comment 5:

III. THE FEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE IMPACTS TO BIOLOGICAL RESOURCES

The FEIR fails in providing the level of analysis mandated by CEQA because it fails to address numerous aspects of how the Project will affect wildlife, as well as providing a thorough analysis of the Project’s impacts to sensitive species and ecological communities. Moreover, the EIR fails to adhere to CEQA’s substantive mandate to adopt mitigation measures and alternatives to reduce a project’s significant impacts wherever feasible. The FEIR maintains several of the deficiencies outlined in comments on the Draft EIR by conservation groups, US Fish and Wildlife Service, California Department of Fish and Wildlife (“CDFW”), and the public.

A. Failure to Properly Disclose and Analyze Impacts to Biological Resources

The FEIR fails to adequately disclose and analyze the Project itself, adjacent areas of biological importance, and impacts to biological resources. Importantly the FEIR continues to rely upon land held by the California Department of Fish and Wildlife in the San Jacinto Wildlife Area as a buffer for the development, instead of relying upon the Project area itself to mitigate for its impacts to biological resources. By representing the area to the south of the Project that is owned for conservation by CDFW as a buffer for the development the EIR fails to properly disclose the existing environmental conditions in the vicinity of the Project and disclose how the Project will impact those lands already set aside for permanent conservation in contravention of CEQA. (San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus, 27 Cal. App. 4th 713, 722.)

Response 5:

The term, “CDFW Conservation Buffer Area”, is used in the EIR to distinguish the 910-acre area from the remainder of the SJWA and other lands owned by the CDFW in Section 3.4.1 of the DEIR. The “CDFW Conservation Buffer Area” is owned by the State and refers to the fact that the State purchased the property to

incorporate into the SJWA and buffer the SJWA from development to the north as: “The DFG has identified the subject properties as being within a Significant Natural Area and has recommended the purchase of the property as an addition to the existing WLA. The acquisition of the subject properties are important to the wildlife area as they will serve as a buffer from development north of the WLA and adds significant wildlife benefits to the WLA.” [emphasis added, citation from Wildlife Conservation Board Meeting Meetings, May 18, 2001, page 56]. Section 3.4 of the FEIR analyzes the impacts of the proposed project within the project boundaries, including the CDFW Conservation Buffer Area, and the beyond the project boundaries.

Comment 6:

The FEIR also fails to adequately analyze, and disclose impacts of the wastewater detention basins placed into the 250 foot buffer zone adjacent to the San Jacinto Wildlife Area. These wastewater flood control basins are proposed as equivalent or superior to existing riparian resources under the DBESP. However, flood basins require maintenance such as mowing or dredging that could preclude replacement of the riparian values proposed in the DBESP. The basins may also inhibit sediment flow and de-water rare alkaline resources at the San Jacinto Wildlife Area.

Response 6:

As stated in Section 4.9.6.3, page 4.9-56 of the FEIR the project will comply with the Water Quality Management Plan for the Santa Ana Region of Riverside County (approved by the Santa Ana Regional Water Quality Control Board October 22, 2012), which requires the use of Low Impact Development (LID) Best Management Practices (BMPs) that maximize infiltration, harvest and use, evapotranspiration and/or biotreatment. Flows from the project will be treated first by LID BMPs where the flow will be infiltrated, evapotranspired, or treated. As required by Mitigation Measure 4.9.6.1A, the treated flows will then be reduced to below or equal to pre-development conditions by routing the on-site storm water flows through a series of on-site detention and infiltration basins before flows are released off site. These basins will provide incidental infiltration and secondary treatment downstream of the LID BMPs. All runoff from the site will be treated by LID BMPs and then routed through the detention and infiltration basins before it leaves the project area and into Mystic Lake and the San Jacinto Wildlife Area. The project will comply with the Nutrient TMDL for Lake Elsinore and Canyon Lake by implementing LID-based BMPs.

Mitigation Measures 4.9.6.3A and 4.9.6.3B in the FEIR, treatment BMPs consisting of infiltration, bioretention and low impact development will be implemented. The Water Quality Management Plan complies with the NPDES and TMDL requirements and the project will direct runoff from impervious surfaces into bioretention facilities before the flow is routed to the infiltration/detention basins. The bioretention areas consist of landscaped areas that provide treatment and infiltration. Bioretention facilities will treat the runoff by infiltration, filtration through the soil media, and evapotranspiration. The detention/infiltration basins will provide additional treatment and infiltration after the flow is treated by the bioretention facilities. Note that the detention basins are not being designed as “detention basins with some infiltration capacity”, but are being designed as infiltration basins and detention basins. As noted, the water will be treated by bioretention facilities first as the primary means of treatment, and that the infiltration basins provide an additional level of treatment beyond what is required by the NPDES permit.

Since this is a programmatic EIR, it will ultimately be up to the resource agencies to determine the actual habitat value of basins planned for actual future development. However, it is anticipated each basin will have a forebay that would be engineered and regularly maintained, plus a central area for detention and infiltration which would have a maintained low flow channel but otherwise it would be sized and designed to allow habitat as well as detention/infiltration which connects to an engineered and maintained outlet. Mitigation Measures 4.4.6.1A and B (buffer/basin design), 4.4.6.3A-C (permitting), 4.4.6.4F-K (basin management process) outline various basin design and management requirements for future development.

Comment 7:

The FEIR also fails to analyze the impacts of relocation of sensitive wildlife species into the 250 foot buffer zone that is also proposed for wastewater detention basins or analyze the potential conflicts that the multiple uses might pose. For example, transporting burrowing owls and the Los Angeles Pocket Mouse (“LAPM”) to the same location that also includes wastewater management poses conflicts between the mitigation features, including inter-species conflicts because burrowing owls may prey on LAPM. Moreover, the 250 foot buffer does not provide a sufficient spatial area to accommodate all of these mitigation uses.

The FEIR fails to adequately analyze the impacts to sensitive species, such as the burrowing owl and LAPM. As noted in previous comments the EIR fails to adequately disclose and analyze impacts to burrowing owl. The FEIR also fails to adequately analyze impacts to LAPM because the biological surveys purport to capture similar species, such as long tailed pocket mice and desert pocket mice even though the range of those species does not include the project area. The FEIR must disclose the survey results for those species in order to determine whether the EIR provides the substantial evidence required to demonstrate that the species captured were not LAPM, which is a protected species under the MSHCP.

Response 7:

First, the two species already share habitat, and the habitat and potential impacts to both species are described in FEIR Volume 3, Revised Draft EIR, Section 4.4.6.4. More importantly, relocation efforts are not limited to the 250-foot buffer. As Mitigation Measure 4.4.6.4D states, “If suitable habitat is not present in Planning Area 30, owls may be relocated to the SJWA, the 250-foot buffer area or other suitable on-site or off-site areas.” As stated in the mitigation measure, CDFW is required to approve all relocation plans and will be able to determine if any species conflict exists.

The FEIR contains a complete analysis of the LAPM. Multiple surveys were carried out as described at FEIR p. 4.4-93 and Appendix E. There is no basis for the contention that surveys misidentified the various mouse species. Likewise, the FEIR contains an analysis of the impacts on the burrowing owl (FEIR p. 4.4-94 and Appendix E). The comment does not identify any inadequacy in the surveys.

Comment 8:

The FEIR fails to disclose impacts to wildlife corridors or analyze conflicts between the MSHCP’s requirements for wildlife corridors. The Project has the potential to impact wildlife movement between the San Timoteo Badlands, the San Jacinto Wildlife Area, Core H of the MSHCP, and Lake Perris. The Project, including building developments, road construction, and traffic, creates an obstruction to wildlife movement between these regionally important wildlife areas. The EIR also fails to adequately describe how the existing drainage 9 or mitigation to that drainage will impact potential wildlife movement. The EIR engages in a cursory dismissal of those impacts and fails to disclose the conflict with the MSHCP.

Response 8:

It should be noted that existing culverts beneath Gilman Springs Road on or near the WLC project site are often clogged with debris or sediment, which hinders their use for wildlife movement. Development of the WLC project, and eventual improvements to Gilman Springs Road, will improve drainage culverts along this portion of Gilman Springs Road and facilitate improved wildlife movement. FEIR Section 4.4.1.14.g identifies the reasons why the project will not have significant impacts on wildlife movement. Further analysis describing why the project area does not serve as a meaningful wildlife corridor is contained in the analysis found in FEIR Section 4.4.5.2. Existing site conditions, such as the presence of SR-60 to the north and the active agricultural uses of property limit the ability of wildlife to use the project area as a corridor.

The statement that wildlife movement in connection to drainage 9 is not adequately addressed is incorrect. The FEIR (p. 4.4-75) states, “In addition, although not required, Drainage 9 is being designed to allow for wildlife movement between the Badlands and the SJWA (e.g., relatively natural channel conditions with 50-foot setbacks on either side of the channel through the WLCSP property). These project design features will

maintain a wildlife travel path along Drainage 9. Therefore, impacts related to wildlife movement are less than significant, and no mitigation is needed.”

Comment 9:

As summarized by the US Fish and Wildlife Service and CDFW, who are implementing agencies on the MSHCP, the FEIR fails to conform with the MSHCP:

We cannot concur with the conclusion in the DBESP until questions regarding site hydrology, assessment of riparian/riverine resources, the presence of Los Angeles pocket mouse and redirection of wildlife movement around the site are resolved and a strategy [that] is equivalent or superior to avoidance has been identified.

(FEIR App. E-16, Comment 12.) The deficiencies in the FEIR must be addressed before final consideration of the Project.

Response 9:

The commenter misrepresents the comment and does not show the original response. The agencies are discussing the DBESP process, which continue throughout the development. Below is the full comment and response:

Comment 12

We would also like to discuss the results of the Los Angeles Pocket mouse surveys, and as stated above, request copies of the latest survey reports. Prior to completion of the DBESP process, we request a hydrology report that addresses existing flows to the rare alkaline plant community on the SJWA and expected changes in those flows in the presence of the proposed basins at the southern edge of the project. We cannot concur with the conclusion in the DBESP until our questions regarding site hydrology, the assessment of riparian/ riverine resources, the presence of Los Angeles pocket mouse and redirection of wildlife movement around the site are resolved and a strategy the is equivalent or superior to avoidance has been identified.

Response:

The requested focused survey reports will be provided to the Agencies. In connection with project-specific applications, additional LAPM surveys will be prepared and processed. A program-level Hydrology Report (September 2014 CMH2Hill) was prepared as part of the Specific Plan. Wildlife Agencies will be provided a site-specific project Hydrology Report when site-specific projects are proposed. The project is required to maintain the same amount of flows off-site after construction that currently occur pre-construction. In addition, the accumulated run-off from the impermeable surface of the project site will provide more available moisture that will be contained within the detention basins, which will then percolate and contribute to the sub-surface flows.

Comment 10:

i. The FEIR fails to adequately analyze biological impacts on riparian/riverine features and jurisdictional waterways

The FEIR fails to properly analyze the impacts to biological resources by failing to properly disclose riparian/riverine and hydrological features. The failure to properly disclose the impacts to several hydrological features also prevents the FEIR from properly conforming to the Western Riverside County Multiple Species Habitat Conservation Plan (“MSHCP”), including the failure to perform an adequate Determination of Biologically Equivalent or Superior Preservation (“DBESP”) as required by the MSHCP. Failure to properly disclose the riparian/riverine and hydrological features is a necessary predicate to determining avoidance and mitigation measures that are necessary through both the programmatic and project level DBESP analysis.

The failure of the EIR to properly disclose and analyze the impacts to riparian/riverine features prohibits the Project’s compliance with the Western Riverside County MSHCP. The MSHCP requires a specific analysis for

riparian/riverine resources. (MSHCP Section 6.1.2). The MSHCP defines riparian/riverine areas as lands which contain habitat dominated by plants which occur close to or which depend upon soil moisture from a nearby fresh water source, or areas with fresh water flow during all or a portion of the year. (MSHCP Section 6.1.2.) The biological studies for the Project recognize that riparian/riverine features occur in drainage features 7, 8, 9, and 12, and 15. (FEIR at 1-37, 4.4-87). Because the Project will impact these resources a Determination of Biologically Equivalent or Superior Preservation (“DBESP”) is required. (MSHCP Section 6.1.2). A DBESP analysis requires, at a minimum, a determination of whether avoidance is feasible, minimization measures for indirect impacts, mitigation that would fully offset any impacts, and a determination that mitigation proposed is biologically equivalent or superior. (MSHCP Section 6.1.2).

Response 10:

The FEIR contains a complete analysis of riparian/riverine features and necessary mitigation measures that can be found at FEIR Section 4.4.1.14.e, 4.4.3.5, and 4.4.6.3. The comment does not state how analysis failed to properly disclose impacts to riparian/riverine features. A programmatic DBESP has been prepared for the project (FEIR Appendix E-7) and Mitigation Measure 4.4.6.3B establishes the requirements for project-level DBESPs.

Comment 11:

However, the FEIR fails to conduct the analysis of riparian/riverine features and DBESP analysis required by the MSHCP. Instead, the EIR only conducts a programmatic DBESP and defers a full analysis of the Project’s impacts on riparian/riverine features and a project-based DBESP analysis until the future. (FEIR at 4.4-87, 4.4-92.) As we stated previously, the applicant incorrectly conducted a programmatic EIR despite this proposed development clearly being one project. (See Section II above.) The programmatic DBESP analysis is also improper as it segments much of the Project’s impacts into smaller phases that will improperly mask the cumulative impacts of the Project. It further defers much of the analysis and mitigation to a later phase in contravention of CEQA. For example, the FEIR states that “impacts will be mitigated through a combination of riparian habitat creation on-site, creation of riparian habitat off-site, and/or purchase of credits at an approved mitigation bank.” Appendix E-7 DBESP Analysis at 27, 31, 40 (“Project-specific mitigation measures have not been created nor approved because a program level document cannot provide that level of specificity.”) In order for a programmatic analysis to be functional it must provide enough information to demonstrate that the mitigation strategy is equivalent or superior to avoidance, but the vague and deferred nature of the DBESP precludes this information from being disclosed to the public or decisionmakers. A more defined DBESP is needed to conform to the MSHCP and CEQA’s requirements for analysis and mitigation of impacts.

Response 11:

See response to Comment 4 above regarding the programmatic nature of the environmental review.

The FEIR conducts a cumulative analysis of the project impacts (FEIR Section 4.4.7), an analysis that will be updated with subsequent environmental review necessary for project-level approval. The mitigation measures identify clear performance measures necessary to mitigate impacts. At this time, the size, location, or number of buildings are unknown. Until project-level details are known, it is not possible to determine the specific mitigation method that will be used. The performance standards that are set forth in the FEIR ensure future mitigation, while considering a programmatic environmental review.

Comment 12:

The FEIR contradicts itself in discussions regarding whether riparian habitats exist in the Project area. In analyzing consistency with applicable local General Plan Policies the FEIR states “[t]here is no riparian habitat within the Specific Plan area.” (FEIR Vol. 1 (Response to Comments) at 442.) However, the FEIR itself contradicts this statement in finding that five drainage features (Drainages 7, 8, 9, 12 and 15) were determined to be riparian/riverine under MSHCP guidelines and waters of the state subject to CDFW and RWQCB jurisdiction under Section 1600 of the Fish and Game Code and Porter Cologne Act. (FEIR at 4.4-59, 4.4-90; FEIR Vol. 1 (Response to Comments) at 438.)

Additionally, the FEIR claims that Drainage feature 14 contains “no native riparian habitat.” (FEIR at 4.4-90.) However, this is contradicted by other portions of the FEIR and the biological surveys for the project from the DEIR, which indicated that the native habitat of “southern willow scrub” occupied 0.86 acres of drainage feature 14 and provides habitat for least Bell’s vireo, and southwestern willow flycatcher. (FEIR at 4.4-14, 4.4-45; see also DEIR App. E at 54, 120; but see FEIR App. E at 67 (omitting size of southern willow scrub and dismissing habitat ability to support sensitive bird species without explaining discrepancy between this and previous study). Attempts to dismiss the riparian areas in the text of the FEIR by asserting that it does not provide suitable habitat for riparian/riverine planning species, when other portions of the FEIR and studies for the DEIR acknowledge that the area contains habitat that could be used by native wildlife runs contrary to CEQA.

The FEIR also attempts to dismiss the impacts to this riparian habitat by citing to a portion of the MSHCP, which purports to minimize the requirements to analyze impacts to riparian/riverine resources that are artificially created. (FEIR Vol. 1 (Response to Comments) at 442.) However, this does not minimize the requirement to disclose, analyze, and mitigate impacts to sensitive habitat and wildlife as required under CEQA. The FEIR goes further in masking the conflict with applicable plans by claiming that the riparian areas containing riverside sage scrub, southern willow scrub, and mule fat scrub are not natural drainage courses requiring preservation under mitigation under the Moreno Valley General Plan Policy 7.4.3. The EIR’s failure to adequately disclose and analyze the Project’s impacts to riparian features conflicts with and prevents a proper analysis of impacts and mitigation for the regional MSHCP and local plans.

Response 12:

The comment answers its own question by recognizing that there is a difference between riparian/riverine features and riparian/riverine habitat as defined in the MSHCP guidelines. Nonetheless, the FEIR is through in its discussion of both as discussed in RTC F-1-19 and F-1-20.

The FEIR does not dismiss the riparian/riverine areas and conducts a full analysis (FEIR, Section 4.4.6.3). It does distinguish between riparian/riverine features and habitat. The FEIR also identifies mitigation for any potential impacts, “Drainage Feature 7, 8, 9, 12, and 15 within the WLC project are considered riparian/riverine areas, as defined by MSHCP. If impacts to any of these areas cannot be avoided, a DBESP report and relevant mitigation will be required by the RCA. (FEIR p. 4.4-90)”. Mitigation measures 4.4.6.3A, 4.4.6.3B, and 4.4.6.3C identify the necessary steps to reduce project impacts. Since the size, location, and number of buildings are not currently known, it is not possible to know to what degree these features can be avoided. To that end, the mitigation measure incorporate performance measures to ensure they are successful.

Additionally, the FEIR at p. 4.4-87 addresses the potential impact on least Bell’s vireo and southwestern willow flycatcher, finding no impact: “The project area does not contain habitat suitable for covered riparian species, such as least Bell’s vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.”

Comment 13:

Finally, the FEIR fails to and must fully disclose and analyze the biological impacts to this jurisdictional waterway and discuss the potential alternatives and mitigation measures for this impact prior to project approval. Several drainage features, including drainage features 7, 8, 9, 12 and 15, are subject to the jurisdiction of the CDFW and Regional Water Quality Control Board (“RWQCB”), but site specific jurisdictional delineations, evaluations of impacts, and proposed mitigation measures are deferred. (FEIR at 4.4-90). Drainage features 12 and 15 are subject to the jurisdiction of the U.S. Army Corps of Engineers (“USACE”). (FEIR at 4.4-63.) Based on our previous comments to the DEIR, the FEIR now includes that a qualified biologist will prepare a jurisdictional delineation for any drainage channels affected by the project on and off-site. (FEIR at 4.4-91, 4.4-92.) The FEIR states that this JD will be submitted to USACE and CDFW for concurrence, and that consultation with RWQCB and CDFW may still need to be required for these permits. (Id.) This measure still fails to meet the CEQA requirement to analyze and mitigate impacts to jurisdictional waterways and associated biological and hydrological resources, especially given that it already acknowledges

that several drainages are under the jurisdiction of USACE, CDFW, and RWQCB. (FEIR at 4.4-90; CEQA Guidelines §§ 15126.2, 15126.4; Pub. Res. Code § 21081.6(b).)

Response 13:

Since the size, location, and number of buildings are not currently known, it is not possible to know to what degree these features can be avoided. To that end, the mitigation measure incorporate performance measures to ensure they are successful. Mitigation measures 4.4.6.3A, 4.4.6.3B, and 4.4.6.3C identify the necessary steps to reduce project impacts.

Comment 14:

B. Failure to Adopt Feasible Mitigation Measures and Deferral of Mitigation

The EIR's attempt to rely upon a programmatic analysis of the specific plan leads to an improperly vague deferral of mitigation measures. The FEIR states that "impacts will be mitigated through a combination of riparian habitat creation on-site, creation of riparian habitat off-site, and/or purchase of credits at an approved mitigation bank." (FEIR App. E-7 DBESP Analysis at 27, 31, 40 ("Project-specific mitigation measures have not been created nor approved because a program level document cannot provide that level of specificity.")) However, this fails to provide the level of detail required to determine whether the EIR will meet the standards for biologically or superior equivalence as required by the MSHCP and the EIR's commitment to those standards to mitigate impacts to biological resources.

Response 14:

The mitigation measures are not vague; the measures specifically outline what is required to mitigate project-level impacts. Any project-level mitigation will also be subject to subsequent environmental review. Ultimately, it will be the resource agencies that will determine if the project-level mitigation meets the standards established in the mitigation measure and any additional requirements that the resource agency has.

Comment 15:

The FEIR improperly rejects several specific mitigation measures proposed by the US Fish and Wildlife Service and CDFW. The FEIR fails to adopt feasible mitigation for the realignment of drainage 9 without any substantial evidence ("realignment of the entire drainage from Gilman Springs Road to the habitat associated with the SJWA is not feasible.") (FEIR App. E-16, Response to Comment 10.) The lead agency cannot simply dismiss CEQA's substantive mandate to mitigate impacts with conclusory statements. The EIR also rejects fencing along Gilman Springs Road in order to address the impacts from the Project on wildlife movement due to obstructions and increased traffic. (FEIR App. E-16, Response to Comment 4.) The FEIR asserts that it cannot coordinate with the County of Riverside on fencing the area northeast of Gilman Springs Road because the Project owner is not the owner of that property. However, there is no evidence that the project proponent or lead agency even approached the County about implementing such a mitigation measure. This mitigation measure would also be a proper subject for any annexation proceedings that are necessary for the Project.

Response 15:

The response to US Fish and Wildlife Service and CDFW does not simply dismiss suggested mitigation. Instead, it offers a clear explanation as to why it is unnecessary, "There is also a secondary crossing (4 foot x 4 foot) further to the south that also conveys flows to Drainage 9. These box culverts meet the minimum requirements to provide wildlife movement for the target species as discussed in the MSHCP (mountain lion). The box culverts feed directly into Drainage 9 and no realignment of the drainage is required. (FEIR App. E-16, Response to Comment 10)".

With regard to the fencing of the area northeast of Gilman Springs Road, mitigation measures that are outside the jurisdiction of the City of Moreno Valley are infeasible since the City has no ability to control the timing or manner of implementation or even if such mitigation measures would be implemented at all.

Comment 16:

The EIR also fails to adopt feasible mitigation measures to reduce the Project's impacts to special status species, such as the burrowing owl. The US Fish and Wildlife Service and CDFW requested that a relocation plan be developed for any burrowing owls that may be found on the project site because burrowing owls have been found on the project site in the past. (FEIR App. E-16, Comment 4.) However, the EIR takes the legally untenable position that the FEIR and specific plan are "not a vehicle to establish/enforce environmental mitigations nor does the City of Moreno Valley... place conditions on th[ese] documents." (FEIR App. E-16, Response to Comment 4.) This clearly misinterprets CEQA's requirements that mitigation measures be concrete and enforceable.

Response 16:

The comment misrepresents the response contained in FEIR Appendix E-16. The comment does not say the "FEIR and Specific Plan" as the Specific Plan is a planning document and not the vehicle for mitigation. The comment then goes on to say to discuss the requirements of the MSCHP Consistency Analysis and mitigation measures contained within the FEIR. The response concludes by stating that the mitigation CDFW is seeking (burrowing owl relocation plan) is already required by the MSCHP Consistency Analysis and is included as Mitigation Measure MM Bio-6g.

Comment 17:**IV. THE FEIR'S GREENHOUSE GAS EMISSIONS ANALYSIS IS INADEQUATE AND INCOMPLETE**

The FEIR's analysis of the Project's greenhouse gas ("GHG") emissions is woefully inadequate and is misleading to the public and decisionmakers about the true scope of the Project's GHG emissions. (See FEIR Sec. 4.7.) The FEIR fails to take into account all potential sources of GHG emissions from the Project and then ignores large emission sources when completing the FEIR's significance analysis. Most troublingly, the FEIR refuses to take responsibility for and minimize a large portion of the Project's GHG emissions. (FEIR at 4.7-40-49.) This approach violates CEQA requirement that an EIR fully analyze and attempt to mitigate all significant direct and indirect impacts of a project. (CEQA Guidelines § 15126.2; Pub. Res. Code § 21002.) The FEIR, however, fails to adopt all feasible mitigation measures to address all of the Project's tremendous GHG emissions and instead addresses only a small fraction of the Project's overall GHG emissions with meager and insufficient mitigation measures. (Compare 19,237 metric tons ("mt") of CO₂ with 490,010 mt of CO₂; FEIR 4.7-40.) Therefore, the FEIR's significance analysis and mitigation measures for the Project's anticipated GHG emissions are inadequate under CEQA. The FEIR should be revised to comply with CEQA and recirculated to the public and decisionmakers.

Response 17:

The comment does not state what GHG emissions are being ignored. The FEIR addresses all sources of GHG emissions and adopts all necessary mitigation to reduce impacts to a less than significant level, see FEIR Section 4.7.

Comment 18:

Action to address climate change becomes ever more urgent with each passing day. The National Oceanic and Atmospheric Administration ("NOAA") and National Aeronautics and Space Administration ("NASA") confirmed that 2014 was the hottest year ever recorded. (NASA 2015.) In the National Climate Assessment released by the U.S. Global Change Research Program, experts make clear that "reduc[ing] the risks of some of the worst impacts of climate change" will require "aggressive and sustained greenhouse gas emission reductions" over the course of this century. (Melillo 2014.) Indeed, humanity is rapidly consuming the remaining "carbon budget" necessary to preserve a likely chance of holding the average global temperature increase to only 2°C above pre-industrial levels. According to the Intergovernmental Panel on Climate Change, when non-CO₂ forcings are taken into account, total cumulative future anthropogenic emissions of CO₂ must remain below about 1,000 gigatonnes (Gt) to achieve this goal.¹ Some leading scientists—characterizing the effects of even a 2°C increase in average global temperature as "disastrous"—have prescribed a far more stringent carbon budget for coming decades. (Hansen 2013.) Climate change will affect California's climate,

resulting in such impacts as increased temperatures and wildfires, and a reduction in snowpack and precipitation levels and water availability, as we detail below.

In order to help stabilize the climate and avoid catastrophic impacts to our environment, the California legislature and Governor Brown have taken important steps. California has a mandate under AB 32 to reach 1990 levels of GHG emissions by the year 2020, equivalent to approximately a 15 percent reduction from a business-as-usual projection. (Health & Saf. Code § 38550.) Based on the warning of the Intergovernmental panel on Climate Change and leading climate scientists, Governor Brown issued an executive order in April 2015 requiring GHG emission reduction 40 percent below 1990 levels by 2030. (Executive Order B-30-15 (2015).) The Executive Order is in line with a previous Executive Order mandating the state reduce emission levels to 80 percent below 1990 levels by 2050 in order to minimize significant climate change impacts. (Executive Order S-3-05 (2005).) In enacting SB 375, the state has also recognized the critical role that land use planning plays in achieving greenhouse gas emission reductions in California.²

The state Legislature has found that failure to achieve greenhouse gas reduction would be “detrimental” to the state’s economy. (Health & Saf. Code § 38501(b).) In his 2015 Inaugural Address, Governor Brown reiterated his commitment to reduce greenhouse gas emissions with three new goals for the next fifteen years:

- Increase electricity derived from renewable sources to 50 percent;
- Reduce today’s petroleum use in cars and trucks by 50 percent;
- Double the efficiency of existing buildings and make heating fuels cleaner.

(Brown 2015 Address.) Although some sources of GHG emissions may seem insignificant, climate change is a problem with cumulative impacts and effects. (Ctr. for Biological Diversity v. Nat’l Highway Traffic Safety Admin., (9th Cir. 2008) 538 F.3d 1172, 1217 (“the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis” that agencies must conduct).) One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California’s climate as a whole. Therefore, CEQA requires that an EIR consider both direct and indirect impacts of a project and fully disclose those impacts to adequately inform the public and decisionmakers. (CEQA Guidelines, § 15064.) Here, the FEIR failed to meet this requirement.

Response 18:

The FEIR analyzed both direct and indirect sources of GHGs, see FEIR Volume 3 Section 4.7.

Comment 19:

A. The FEIR Significance Analysis of the Project’s GHG Emissions Should Take into Account All GHG Emissions from the Project

At full build out the Project is anticipated to emit 415,991 mt of CO₂ without mitigation measures. (FEIR Air Quality, Greenhouse Gas, and Health Risk Assessment Report: 294 [hereinafter “HRA Report”].) However, when analyzing the significance of the Project’s GHG emissions and considering potential mitigation, the FEIR looked only at portion of these emissions. Specifically, the FEIR examines the significance and potential mitigation of only 19,237 mt of CO₂. The FEIR justifies ignoring the remaining 396,754 mt of emissions by arguing these emissions are independently covered by AB 32’s Cap and Trade Program. (FEIR HRA Report at 284-5.) Emissions disregarded by the FEIR are the vast majority of the emissions resulting from the Project, including mobile, electricity, construction fuel, yard trucks, electricity to convey water, generator, forklifts used on the site. (FEIR HRA Report at 294.) Instead, the FEIR focuses on so-called uncapped emissions which include waste, land use change, refrigerants that result in 19,237 mt of emissions. (FEIR, App, D at 284-5.) This approach allows the FEIR to focus only on approximately 21% of the Project’s GHG emissions and conclude the Project with only a few mitigation measures will result in no significant impacts. This approach is flawed, misleading and violates CEQA.

*The FEIR justifies its significance threshold and analysis by citing to San Joaquin Valley Air Pollution Control District's and South Coast Air Quality Management District's use of a similar approach when they were acting as lead agencies on other projects. (FEIR at 4.7-41.) However, while the significance threshold and analysis may have been based in part of existing thresholds, compliance with the law is not enough to make a finding of less than significant under CEQA. (See *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107.) Instead "the EIR's discussion of impacts must "provide[] sufficient information and analysis to allow the public to discern the basis for the agency's impact findings. Thus the EIR should set forth specific data, as needed to meaningfully assess whether the proposed activities would result in significant impacts." (Sierra Club v. Tahoe Reg'l Planning Agency (2013) 916 F. Supp. 2d 1098, 1146-1147 (Sierra Club).) The FEIR fails to meet this CEQA requirement and instead leaves the public and decisionmakers uncertain on the Project's true environmental impacts and avoid necessary steps to reduce those impacts.*

The FEIR anticipates emissions for the Project as far as 2030 and at full build out of the Project beyond. However, AB 32 Cap and Trade program currently runs only until 2020. (See <http://www.arb.ca.gov/cc/capandtrade/capandtrade.htm>.) Currently, there are no provisions for the Cap and Trade program to extend beyond 2020 and the scope of the program beyond 2020 is uncertain. Nonetheless, the FEIR relies on AB 32's Cap and Trade Program to fully minimize and mitigate nearly 400,000 mt of CO2 emissions at full build out of the Project. This reliance by the FEIR is without any evidentiary basis and should either be removed or substantially revised.

Response 19:

The FEIR appropriately relies on AB32 and the Cap and Trade program to address greenhouse gases. The commenter claims that there is no provision for AB32 to extend beyond 2020. This is incorrect. AB32 states the following at Section 38551: "(a) The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed. (b) It is the intent of the Legislature that the statewide greenhouse gas emissions limit continue in existence and be used to maintain and continue reductions in emissions of greenhouse gases beyond 2020."

Through the Cap and Trade program, the State has created a pool of allowable carbon emissions from select emission source sectors (e.g., fuels and energy). The size of the pool of allowable carbon emissions (known as allowances) is set by the State and is independent of the need of any project. To the degree that user of carbon emissions reduces demand, other users of carbon emissions can use up the available capacity. Since price of the allowances is determined by demand, any reduction in demand will not mean fewer emissions (which set by the establishment of the available pool by the State), it will mean lower prices for the remaining users of carbon emissions. In this manner, users that can reduce their need for allowances at a lower cost than the market price for an allowance will do so, resulting in the reduction of carbon emissions to the level established by the State at the lowest possible cost. Other carbon users will then be able to purchase the remaining allowances due to reduced demand and price resulting in no change in carbon emissions. Only the State can adjust the cap and modify the State's long-term reduction goal.

Executive Order B-30-15 orders a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030. Senate Bill (SB) 32, now under consideration in the assembly, amends AB32 to achieve greater emission reductions and would require that GHG emissions in California be reduced 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

To reduce GHG emissions to those levels, a cap-and-trade program beyond 2020 would be necessary. Resolution 13-44 dated October 25, 2013 (Amendments to the California Cap-and-Trade regulation) states the following: "WHEREAS, the draft update to the AB 32 Scoping Plan recommends the development of post-2020 emissions reduction targets, and that sending a signal that Cap-and-Trade will continue beyond 2020 is critical to fully realizing the benefits of the program...BE IT FURTHER RESOLVED that pursuant to the draft update to the AB 32 Scoping Plan, the Board directs the Executive Officer to develop a plan for a post-2020

Cap-and-Trade Program, including cost containment, before the beginning of its third compliance period to provide market certainty and address a potential 2030 emissions target.”
(www.arb.ca.gov/cc/capandtrade/resolution13-44.pdf)

The following excerpts are from the First Update to the Scoping Plan (California Air Resources Board, 2014, www.arb.ca.gov/cc/scopingplan/document/updatedscopingplan2013.htm).

Together, LCFS [Low Carbon Fuel Standard] and Cap-and-Trade provide a structure to ensure that necessary emission reductions are achieved and provide an effective market signal to accelerate innovation and development of cleaner fuels. Continuing these policies beyond 2020 will ensure that fuel carbon intensity continues to decline and that low-carbon alternatives to petroleum are available in sufficient quantities in the long term.

...The Cap-and-Trade Program is a vital component in achieving both California’s near-and longterm GHG emissions targets. California’s Cap-and-Trade Regulation is purposely designed to leverage the power of the market in pursuit of an environmental goal. It opens the door for major investment in emission-reducing technologies and sends a clear economic signal that these investments will be rewarded. The Cap-and-Trade Regulation establishes a hard and declining cap on approximately 85 percent of total statewide GHG emissions.

...Sending the market a signal that the Cap-and-Trade Program will continue in the long-term is critical to fully realizing the benefits of the program. Continuing the program and establishing an emission cap beyond 2020 will also reduce the costs of the program as California industry and households make long-term capital and investment decisions.

Because of the policies put in place by the State of California, the FEIR appropriately takes responsibility for those emissions over which it has direct control (uncapped emissions not part of the State’s Cap and Trade program), but not the emissions for which the State has already set an aggregate cap which WLC project has no ability to influence. These issues are fully described in the FEIR Volume 3, Revised Draft EIR, Section 4.7.

Comment 20:

The FEIR also fails to adequately explain how it categorizes certain categories as capped and others as uncapped. For example, the FEIR fails to take into account vehicles miles traveled into its GHG significance analysis or adoption of mitigation measures. (FEIR at 4.7-47-48.) The FEIR acknowledges that vehicles miles traveled is the Project’s biggest contributor to GHG emissions but disregards it completely when discussing the significance of the Project’s impacts. The FEIR justifies this determination by citing to SJVAPCD determination in an independent and unrelated context. The FEIR must include a clear description of the Project’s impacts and provide a detailed explanation of its analysis of those impacts. (Sierra Club, supra, 916 F. Supp. 2d at 1146-47.) Simply citing to other regulatory approaches in the state is insufficient. The FEIR explanation of other “capped” sectors is similarly vague and inadequate. The FEIR should further explain its classification of “capped” and “uncapped” sectors and recirculate a revised GHG analysis.

Response 20:

Both the FEIR and Air Quality, Greenhouse Gas, and Health Risk Assessment Report, Appendix (Appendix D), both describe how the FEIR differentiates between capped and uncapped emissions. Section 3.4.3 of the Appendix D states the following:

“In addition, the Scoping Plan differentiates between “capped” and “uncapped” strategies. “Capped” strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the cap-and trade program will help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve a sufficient amount of reductions by 2020 to achieve the emission target contained in AB 32. “Uncapped” strategies that will not be subject to the cap-

and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional greenhouse gas emission reductions.”

Tables identifying the capped and uncapped emissions, consistent with the Cap and Trade program, are found through Section 4.7 of the FEIR and Appendix D.

The comment contends that the FEIR does not take into account vehicle miles traveled (VMT) into its GHG analysis. First, VMT does not generate GHGs, the combustion of fuel does. The FEIR estimates the GHGs produced from transportation fuels based upon VMT. So, in an indirect way the analysis does take into account VMT in its GHG analysis. Since the GHGs result from fuel combustion, that source of GHGs fall within the transportation fuel/mobile source category that is part of CARB’s capped emissions under AB32. Mobile sources, with all other GHG sources, can be found in Table 4.7.J in FEIR Section 4.7.

Comment 21:

As noted above, the goal of AB 32 is to reduce California greenhouse gas emissions to 1990 levels by 2020. (Health & Saf. Code § 38550.) Recent science, however, indicates that far steeper reductions are necessary to avoid the most significant impacts of climate change. Even to stabilize atmospheric CO2 concentrations at 450 parts per million (“ppm”) and limit global average temperature increases to 2°C—a level at which devastating effects may still occur—industrialized countries will have to reduce emissions by 25-40% below 1990 levels by 2020. Many scientists believe that avoiding the worst impacts of climate change will require reducing the concentration of CO2 in the atmosphere to 350 ppm or below, which will require even steeper and more rapid reductions. The FEIR must analyze the cumulative significance of the Project’s emissions in light of reductions needed to avoid contributing to these physical impacts, not just measure them against the AB 32 Scoping Plan, regional significance thresholds and the state’s renewable generation goals. This was further emphasized in the Scoping Plan itself which emphasized the steep reductions in GHG emissions that must occur after 2020 to stabilize the climate. (2008 Scoping Plan at 33; see also Climate Change Scoping Plan 2014 Update.) The FEIR cannot rely on AB 32 Cap and Trade Program to avoid its own obligation to fully analyze and mitigate all of the Project’s GHG emissions.

B. The FEIR Fails to Consider Mitigation Measures and Alternative to Minimize All Sources of GHG Emissions from the Project

Mitigation of a project’s environmental impacts is one of the “most important” functions of CEQA. (Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30, 41.) Therefore, it is the “policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects.” (Pub. Res. Code § 21002.) Here however, the FEIR adopts only a few mitigation measures, all of which are inadequate to address the Project’s massive GHG emissions. (FEIR at 4.7-48.)

Additionally, to comply with CEQA, mitigation measures must be “fully enforceable through permit conditions, agreements, or other legally-binding instruments.” (CEQA Guidelines § 15126.4(a)(2).) The measures must be “incorporated into the project or required as a condition of project approval in such a way that [would] ensure their implementation.” (Fed’n of Hillside and Canyon Assoc. v. City of Los Angeles, (2000) 83 Cal. App. 4th 1252, 1262 (Federation).) CEQA also requires the adoption of all feasible mitigation measures that would reduce the environmental impacts of a project. (Pub. Res. Code § 21002; CEQA Guidelines § 15126.4(c); City of Marina v. Bd. of Trs. of the Cal. State University (2006) 39 Cal.4th 341, 369-70.)

Although the Project includes a curtailed list of measures directed at reducing emissions and promoting sustainability, these strategies are severely limited and do not include many feasible mitigation measures. (FEIR at 4.7-47.) The meager steps incorporated into the Project includes no enforcement mechanisms and leaves many feasible mitigation measures out completely. (FEIR at 4.7-48.) The mitigation measures are often vague with no specific quantities or binding obligations. (Id.) The FEIR justifies this approach in part by stating that it must mitigate only uncapped emissions resulting from the Project. (FEIR at 4.7-47-49.) However, as

noted above, this approach is flawed and without evidentiary or legal support. The FEIR cannot simply ignore 80% of the Project's GHG emissions and their resulting environmental impacts when adopting mitigation measures. The FEIR subsequent conclusion that its limited mitigation measures will ensure the Project's GHG emissions will have significant impacts is misleading. The Project will in fact do nothing to mitigate 396,754 mt of CO2 emissions resulting from the Project.

Available and feasible mitigation measures during construction and operation of the Project would lower the Project's overall GHG emissions and contribution to climate change. California Air Pollution Control Officers Association ("CAPCOA") has identified existing and potential mitigation measures that could be applied to projects during the CEQA process to reduce a project's GHG emissions. (CAPCOA 2010.) The California Office of the Attorney General also has developed a list of reduction mechanisms to be incorporated through the CEQA process. (CA AG 2010.) These resources provide a rich and varied array of mitigation measures that should be incorporated into the revised Project.

For example, as it stands now, rooftop solar power is the most energy efficient, least-environmentally damaging form of renewable energy available for the Project and is ideal for the Project's location. The Project's current on-site renewable energy goals are, however, too modest in scope with only 5.2% of electricity from the Project coming from solar at the end of build out. (FEIR at 4.7-50.) The conservation group urges firm requirements that onsite renewable energy be used to meet at a minimum 30% of the Project's energy use and each subsequent 5 year period include growing reliance on onsite renewable energy to meet its energy demands. These renewable energy use targets should be required mandates to ensure the necessary measures are incorporate into future design plans for the Project. New construction, like this Project, has a unique opportunity to full embrace and incorporate the use of renewable energy in its design, construction and operation. Mitigation measures to reduce vehicle miles traveled, energy use, waste, water consumption, greater use of solar power, hybrid vehicles, LEED certification and others could also all lower the Project's impact on climate change. (CAPCOA 2010; CA AG 2010.)

The FEIR acknowledges that the Project will result nearly 400,000 mt of CO2 emissions but does little to fully analyze, minimize or mitigate the environmental impacts resulting from the Project's GHG emissions. The FEIR's GHG significance analysis and determination on what mitigation measures are necessary was flawed and raises serious concerns about the Project and its impacts on the region as well as the state. The FEIR's determination that with mitigation, the Project will result in no significant GHG emissions is grossly misleading to the public and decisionmakers and violates CEQA. We urge that the FEIR be revised and recirculated to address these concerns and ensure that the Project's substantial GHG emissions are clearly disclosed, adequately analyzed and fully mitigated.

Response 21:

The commenter is incorrect, the EIR does contain a number of mitigation measures that will significantly reduce GHG emissions from the WLC project, both during construction and operation. Mitigation Measure 4.7.6.1A deals with solid waste reduction, but the measures shown in Table 4.7.1 in the FEIR would also reduce GHG emissions. These are as follows: MM 4.3.6.2A (Tier 4 construction equipment), MM 4.3.6.4A (bike lanes, rideshare program, bicycle storage, changing rooms, lockers for employees, pedestrian connections, parking for fuel efficient vehicles), MM 4.16.4.6.1A and 4.16.4.6.1B (LEED certification and other energy efficiency), MM 4.16.4.6.1C (onsite solar panels), MM 4.16.1.6.1A (outdoor water usage reduction), and MM 4.16.1.6.1B (interior water usage reduction). It should be noted the Mitigation Monitoring and Reporting Program (FEIR Volume 1) outlines how these measures will be implemented by future development within the WLC project. During the response to comment process on the Draft EIR, the sources of potential mitigation measures as suggested by the commenter (the CAPCOA report and those prepared by the California Attorney General) were assessed for feasibility (see FEIR Volume 1, Response to Comments, Letter F-1, Responses F-1-42 to F-1-53 (FEIR pages 450-455)).

However, the greatest reduction for potential future GHG emissions is from vehicular fuel emission reductions through the State's Cap and Trade program. See Response 19 to this letter above and Section 4.7 in the FEIR for information regarding the Cap and Trade program.

Finally, the FEIR concludes that the construction and operation of the WLC will not have a significant GHG impact (see FEIR Section 4.7.7, pages 4.7-59 and 4.7-60).

Comment 22:

V. THE FEIR FAILS TO ESTABLISH AN ADEQUATE AND ACCURATE ENVIRONMENTAL BASELINE REGARDING WATER SUPPLY

The FEIR presents an improper environmental baseline regarding the availability of water resources in the region, alluding to the unreliability of water supply as well as current and likely future water scarcity in California while still relying on unsubstantiated and outdated assumptions. (Guidelines § 15125 (EIR must include description of physical environmental conditions in the vicinity of the Project at the time of the notice of preparation is published or at the time when environmental analysis is commenced).) This failure violates the EIR's fundamental purpose to serve as an informational document to inform decision-makers and the public of any significant adverse effects on the physical environment. (Guidelines §§ 15121, 15125; Neighbors for Smart Rail v. Exposition Metro (2013) 57 Cal.4th 439, 447 (Neighbors).) The FEIR discusses existing water supply conditions based on the Project's Water Supply Assessment, which relies on the 2010 Urban Water Management Plan ("UWMP") provided by the Eastern Municipal Water District ("EMWD") that is responsible for supplying water for the Project. (FEIR at 3-45; FEIR, App. M (Water Supply Assessment) at 19, 22-23 (hereinafter "WSA").) In turn, the UWMP relies in large part on the Metropolitan Water District ("MWD")'s 2010 Regional Urban Water Management Plan ("RUWMP"), since EMWD imports at least 65% of its water from MWD. (WSA at 5, 21.)

Specifically, in establishing water supply estimates in the 2010 RUWMP MWD "assumed a new Delta conveyance [i.e. Bay Delta Conservation Plan, or Twin Tunnels project] is fully operational by 2022 that would return supply reliability similar to 2005 condition." (2010 RUWMP at 2-16.) The draft BDCP and associated EIR/Environmental Impact Statement ("DEIS") was not released until almost two years after the notice of preparation for this EIR. (2013 Public Review Draft BDCP.) The BDCP has still yet to be approved as of the writing of this comment letter, and will not deliver additional water supply even if it is approved in 2015 since the tunnels will take at least 11-12 years to construct. (BDCP 2013 at 6-3; BDCP 2015.) Based on the reliance on this false assumption the FEIR overestimates the actual availability of water resources in the area, thwarting agencies' and the public's ability to evaluate whether Project impacts on these resources are significant. (Guidelines §§ 15121, 15125; Neighbors, supra, 57 Cal.4th at 447.) The FEIR must be revised in order to provide an accurate description of actual instead of theoretical environmental conditions regarding water supply for the Project. Additionally, the environmental baseline must be revised to incorporate significant new information regarding the ongoing drought crisis and future water scarcity due to climate change, which we discuss in the following section.

VI. THE FEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE IMPACTS ON WATER SUPPLY

The FEIR conducts an inadequate analysis replete with inconsistencies and contradicting conclusions regarding water supply impacts that will result from the Project. Furthermore, the FEIR provides contradicting statements regarding mitigation measures are required to address Project water supply impacts, proposes unenforceable mitigation measures, and defers formulation of mitigation measures.

A. Failure to Properly Disclose and Analyze Impacts on Water Supply

A firm water supply is required for a project to gain approval. (Govt. Code § 66473.7; Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 432 (EIR must demonstrate a reasonable likelihood that a water source the provider plans to use will be available at least in substantial part to supply project's needs) (Vineyard); Santa Clarita Org. for Planning v. County of Los Angeles (2003) 106

Cal.App.4th 715, 723-24 (EIR's water supply impacts analysis cannot rely upon demonstrably illusory supplies.)

The Project will use approximately 1991 acre-feet of potable water per year mainly for landscape irrigation purposes. (FEIR App. M (Water Supply Assessment) at 19; FEIR at 4.16-19.) The WSA does not provide the specific water sources for the Project except that groundwater will not be used. (WSA at 9.) This quantity of water has been determined by the Project WSA to be within the limits of projected demand accounted for in the 2010 EMWD UWMP. (WSA at 19, 22-23.)

Based on this WSA the FEIR concludes that there is adequate, reliable water supply for this Project for industrial uses, and no significant water supply impacts regarding industrial uses will result from this Project and no mitigation measures will be required. (FEIR at 4.16-14; 4.16-20.) However, the FEIR acknowledges that potable water supply is unreliable and MWD is "engaged in planning processes that will identify solutions" to meet Project demands, and that Project impacts on regional water supplies may be significant and mitigation measures are required. (Id.) Similarly, although the FEIR states that water supply impacts will be less than significant with mitigation based on the EMWD water supply assessment, it also provides that "the supply of water imported from the State is not currently guaranteed, so there may be significant impacts related to long-term water supply." (FEIR at 1-85, 4.16-21 (emphasize added).)

The acknowledgment of the FEIR that there is no guaranteed supply of imported water is significant and concerning since the WSA states that EMWD imports 65% of its water supply through the MWD and is expected to satisfy future demands from the Project. (WSA at 5, 21.) In reality, EMWD imports 68% of water from MWD. (EMWD 2015c at 5.) Additionally, water supplies from MWD are even less reliable than the FEIR and WSA allude to for the following reasons that the FEIR fails to but must address.

First, in April 2015 MWD reduced its water delivery by 15% in light of the current drought, which amounts to a 300,000 AF reduction in deliveries to member agencies. (MWD 2015; see also MWD Water Cuts LA Times 2015.) The Water Shortage Contingency Plan ("WSCP") and the MWD 2010 RUWMP that the WSA relies on to conclude that EMWD will be able to meet projected demands under "a repeat of historic drought scenarios," (WSA at 21,) is inadequate to address unprecedented current and future drought situations. (2010 RUWMP at A.4-50-51 (incorporating drought planning based on 1991 & 1992 drought conditions).) Furthermore, in light of the Governor's drought executive order, the State Water Resources Control Board (SWRCB) has mandated that EMWD reduce water use by 28%, which EMWD has begun to implement by requiring a 50% reduction in outdoor irrigation within the district. (EMWD 2015b; EMWD 2015c.)

Additionally, the FEIR also fails to take into account the current as well as likely worse and extended drought conditions in the context of climate change in order to accurately assess Project impacts on water supply. Numerous studies have shown that southwestern United States, which includes California, is very likely in or will very likely enter a megadrought over the length of 10 years due to climate change. (Ault 2014; see also Rice 2014.) Additionally, there is an 80% chance that the Southwest will experience an unprecedented megadrought that would last more than three decades, between 2050 and 2099. (Cook 2015.) In the mean time, this region will experience additional droughts leading up to the megadrought. (Cook 2015.) A recent study regarding droughts in California concluded that anthropogenic climate change has resulted in and will continue to result in the co-occurrence of warm and dry periods in California, which in turn will exacerbate water shortages, groundwater overdraft, and species extinction. (Differbaugh 2015.)

EMWD's plan to supplement existing supplies at the local level to reduce Project impacts on water supply via developing additional local water resources and efficiency measures are also based unsubstantiated promises. (FEIR at 4.16-14 & 4.16-17-18; WSA at 7 & 8.) The Project proposes to use recycled water to meet its non-potable water demands, but EMWD has limited capability to produce recycled water, and future expansions of recycling water in the district is only theoretical or in planning stages. (FEIR at 4.16-18 (majority of irrigated landscaped areas within the Project will be designed to use recycled water "to the greatest extent possible when it becomes available"); but see WSA at 13, 22 ("recycled water may be available for the project" in the future.)

Furthermore, the FEIR anticipates that imported water supplies could be reduced on the condition that MWD's ability to deliver water is reduced, (FEIR at 4.16-18), but fails to take into account the fact that this condition has occurred where MWD has reduced deliveries to its member agencies by 15% due to the drought, and that the BDCP will not provide additional water for the Project at build out even if it is approved in the near future. (MWD 2015; see Section V above.) For these reasons, the FEIR fails to address and must be recirculated to adequately analyze Project impacts on water supply in light of on-the-ground drought and climate change conditions that have resulted in significantly less water supply to EMWD and therefore Project impacts on water supply. (CEQA Guidelines §§ 15088.5, 15121, 15125; *Neighbors, supra*, 57 Cal.4th at 447; *Laurel Heights Improvement Assn. v. Regents of University of California* (1989) 6 Cal.4th 1112, 1136.)

Response 22:

The FEIR fully analyzes the project's water supply demand, the available sources of water, impacts to the water supply, and discusses the basis of EWMD WSA. These discussions can be found detailed in FEIR Section 4.16. In Section 4.16, the FEIR establishes how changing demand will allow EWMD to meet projected "demand through 2035 even under a repeat of a worst drought scenario" (p. 4.16-15), how EWMD determined future demand (p. 4.16-16 – 4.16-17), considered the impact of climate change and drought (p. 4.16-17 – 4.16-18), how EWMD water demand planning has been based upon the General Plan and the Moreno Highlands Specific Plan that would use five times as much water as the WLC Specific Plan (p. 4.16-19), and how the estimated project water demand is current worst case scenario that may overestimate water demand by four times (p. 4.16-19). For all of these reasons, the assessment of water supply and the conclusion of no significant impact contained in the FEIR are sound (p. 4.16-21).

Comment 23:

B. Failure to Adopt Feasible Mitigation Measures and Deferral of Mitigation

The FEIR provides contradicting statements regarding whether mitigation measures for water supply impacts are required in order to reduce impacts on water supply to a less than significant level. Mitigation measures include the use of drought tolerant landscaping, "dry" cleaning equipment, a recirculation system of any outdoor feature, and use of reclaimed water for irrigation "if it becomes available." (FEIR, at 1-20; see also 4.16-20 & 4.16-21.) Yet the FEIR also provides that no water supply mitigation measures are necessary because EMWD will supply sufficient water to meet existing and future potable water demands (but only once planned groundwater storage improvement are completed). (FEIR at 1-83.)

*The FEIR also improperly defers formulation of mitigation measures, to a later time when the development of specific plots is considered. This deferral of developing feasible and enforceable mitigation measures for additional water supply impacts frustrates informed decision-making and violates CEQA. (CEQA Guidelines § 15126.4(a)(1), (2).) The EIR's admission that the Project would result in significant water supply impacts required the adoption of all "feasible alternatives or mitigation measures available which would substantially lessen" these impacts. (Pub. Res. Code § 21002; CEQA Guidelines § 15021(a); *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 360.) Mitigation measures must be feasible and enforceable. (CEQA Guidelines § 15126.4(a)(1), (2); CEQA § 21081 (mitigation measures must be fully enforceable).) Similarly, the EIR must contain performance criteria upon which mitigation measures will be based. (CEQA Guidelines § 15126.4(a)(1)(B) (formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the Project and which may be accomplished in more than one specified way.); *City of Long Beach v. Los Angeles Unified Sch. Dist.* (2009) 176 Cal.App.4th 889, 915 ("Impermissible deferral of mitigation measures occur when the EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR."); *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 281 (a performance standards (in this case draft habitat conservation plan for managing a preserve) can be relied on if it contains specific details including assurance that standards will be satisfied at a particular time and manner).)*

Instead, the FEIR instructs that the developer “shall submit landscape plans that demonstrate compliance with the World Logistics Center Specific Plan” and state laws only prior to the approval of each individual grading permit for each plot, without providing any criteria for which to evaluate how these plans would be required to reduce Project impacts to less than significant levels. (FEIR at 1-85, 4.16-20.) Similarly, the FEIR provides that the applicant will only need to implement water-efficiency designs for each building “to the satisfaction of the Land Development Division/Public Works,” (Id. at 1-86, 4.16-21) and wash down and all irrigation systems will use recycled water “if it comes available.” (Id. at 1-87, 4.16-21.) None of these mitigation measures satisfy CEQA requirements to establish feasible, measurable, and enforceable mitigation measures at the EIR level. (Guidelines § 15126.4(a)(1)(B).)

Importantly, the WSA states the developer is required to meet with EMWD staff to develop a plan of service, and that the service plan could reduce the amount of water available for the Project through on-site improvements. (WSA at 22; FEIR at 3-45, 4.16-18.) However, since this service plan has not been prepared to date, the FEIR has improperly deferred the first step to establishing feasible, enforceable mitigation measures. (FEIR at 4.16-18.) Even if additional water supplies materialize, Project water supply will still be inadequate since the WSA and FEIR explicitly state that EMWD depends on MWD to supply water for future development as well as additional water during dry years, as discussed earlier. (FEIR at 4.16-16 (“the EMWD depends on Metropolitan to supply additional water during dry years”) & 4.16-18 (“the majority of water for future development would be supplied by imported water from Metropolitan”).) Furthermore, the FEIR has failed to assess the impacts of developing additional local water resources and efficiency measures. (Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373 (in light of uncertainty of Project water supplies, the EIR must analyze and disclose the environmental consequences of tapping other resources).)

The FEIR also does not incorporate the mitigation measure of requiring gray water systems as promised by the WSA. (CEQA § 15126.4.) Although the WSA states that the Project may be conditioned to construct separate potable and recycled water systems, and to construct off-site recycle water facilities, this recommendation is not incorporated in FEIR (WSA at 22; FEIR at 4.16-20 & 21.) Even if the Project applicant decides to build indoor gray water systems, EMWD does not have capacity to produce sufficient recycled water to satisfy Project water demands given that the use of recycling systems will occur only if recycled water becomes available as stated above. (Id.) Furthermore, even if it becomes feasible using recycled water for irrigation will not be implemented prior to the activities, violating the CEQA requirement that mitigation measures should be implemented by the start of the Project. (POET, LLC v. State Air Resources Bd. (2013) 218 Cal.App.4th 681, 740 (agency improperly delayed implementing mitigation measures while project went forward.); see FEIR at 1-87, 4.16-21.)

Finally, the WSA provides that it will be reviewed every three years until the Project begins construction to ensure that the information in the WSA are accurate and updated. (WSA at 22.) Since the WSA was finalized in March 2015, the FEIR must be revised to include an updated WSA based on this statement alone.

Response 23:

The FEIR does not have contradictory statements regarding water availability. The FEIR identifies a potentially significant impact regarding water availability (p. 4.16-15), presents an analysis of water availability including the WSA (FEIR Section 4.16.1.6.1), proposes mitigation to ensure that any potential impact is less than significant (FEIR p. 4.16-20 – 21), and concludes that impacts to water availability are less than significant (FEIR p. 4.16-21).

In their WSA, the EMWD has concluded that the agency has the ability to provide water to the project (FEIR, Appendix M-1).

The commenter is incorrect that use of recycled water systems is not incorporated into the FEIR. Mitigation Measure 4.16.1.6.1A clearly requires, “Use of reclaimed water for irrigation if it becomes available.” Since the

FEIR concludes that with the identified mitigation measures there is no significant impact to water availability, no additional mitigation measures are necessary.

The City has requested the EMWD issue a three-year extension on their WSA issued March 2012. There is no indication at this time that their conclusion will change.

Comment 24:

VII. THE FEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE PROJECT IMPACTS REGARDING HYDROLOGY, DRAINAGE, AND WATER QUALITY

The FEIR provides an inadequate impact analysis and defers or proposes unenforceable mitigation measures regarding Project impacts on hydrology, drainage, and water quality. The FEIR concludes that impacts to hydrology, drainage, and water quality will not be significant and do not require mitigation. (FEIR at 1-17.) Yet in the same paragraph and other portions it discusses mitigation measures for these impacts. (Id.; see, e.g., FEIR at 1-20 (concluding that potential impacts to storm water drainage requirements and adequate water supply will be mitigated to a less than significant level).)

The FEIR states that the Project will not require the construction of new storm water drainage facilities or expansion of existing storm water drainage facilities, (FEIR at 4.16-25,) yet provides that five new drainage systems will be constructed to accommodate additional runoff that will result from the Project. (FEIR at 4.16-24.)

Additionally, the FEIR acknowledges that the Project will be required to create a Storm Water Pollution Prevention Plan (“SWPPP”), a Water Quality Management Plan (“WQMP”), and a Water Quality Sampling Program (“WQSP”) to protect the San Jacinto basin developed except for a programmatic WQMP, constituting a deferral of feasible mitigation measures and depriving planning agencies’ and the public their ability to adequately assess the water quality impacts of the Project. (CEQA Guidelines § 15126.4(a)(1)(B) & (a)(2).) The EIR’s attempt to rely upon a programmatic WQMP leads to an improperly vague deferral of specific, enforceable mitigation measures to alleviate water quality impacts. (Federation, supra, 83 Cal. App. 4th at 1262.)

Moreover, the FEIR acknowledges that the Project will introduce a substantial amount of impervious surfaces on the site that could result in significant increases in off-site runoff. (FEIR at 1-87, 4.16-22.) Yet it merely defers any drainage-related mitigation measures to the individual plot planning, which makes it impossible to assess the impacts and cumulative impacts of these measures. (Id.; FEIR at 4.16-25.) Additionally, the FEIR only requires that the drainage plan for each plot design “existing sediment carrying capacity of the drainage courses existing the Project area is similar to the existing condition,” and that the sheet flow after the implementation of the Project is “comparable” to current conditions to minimize erosion. (Id.) However, this mitigation measures fails to actually propose methods to reduce off-site runoff to a less than significant level, e.g. mandating that the average rate, peak flow, and total quantity of runoff after project implementation does not exceed current rates and quantities. Thus, the FEIR’s conclusion that drainage impacts will be less than significant after mitigation is unsubstantiated.

Response 24:

The proposed detention basins will adequately control runoff. As stated in Section 4.9.6.1 on page 4.9-39, paragraph 2 of the FEIR, the detention basins are designed not only as detention basins but as combined infiltration and detention basins. The bottom two feet in depth of the basin is designed as an infiltration basin, i.e., the water will infiltrate in the ground because there is no outlet. Only when the water level rises above two feet will the water flow downstream. Table 4.9.J outlines the basin volumes for both detention and infiltration for each of the 11 basins.

As stated on page 4.9-47 of the FEIR the project’s impacts will be mitigated with the implementation of infiltration basins and bioretention areas. The volume of runoff after the project is constructed will be less than the existing volume of runoff and the amount of infiltration will increase. A hydrologic analysis was performed

for the pre and post project conditions based on historical runoff (p. 4.9-39). The basins have been designed to ensure that the runoff matches the pre-project condition. The hydrologic analysis was based on conservative estimates of soil type and infiltration rates and will be updated with site specific information as each project is developed.

The amount of runoff that will flow to the San Jacinto Wildlife Area will mimic pre-project conditions as outlined in Mitigation Measures 4.9.6.1A and 4.9.6.1B.

Comment 25:

CONCLUSION

Thank you for your attention to these comments. We look forward to working with you to assure that the EIR conforms to the requirements of CEQA to assure that all significant impacts to the environment are fully analyzed, mitigated or avoided. Should you have any questions feel free to contact Jonathan Evans at the contact information listed below.

The Center for Biological Diversity and San Bernardino Valley Audubon Society wish to be placed on the mailing list for all future notices regarding this project. Please mail all notices to CBD at the address listed (via email at jevans@biologicaldiversity.org); and San Bernardino Valley Audubon Society at drewf3@verizon.net and P. O. Box 10973, San Bernardino, California 92423-0973.

Response 25:

The City appreciates the comments made on the FEIR by the commenter and has provided responses to these comments. All materials provided will be made part of the public record. The City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

MEMORANDUM

DATE: June 24, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to Letter from the Center for Biological Diversity and Audubon Society**

In a letter dated June 10, 2015, the Center for Biological Diversity and the Audubon Society submitted comments on the WLC Project FEIR. The specific comments are presented below followed by specific responses to each comment.

Comment 1:

These comments are submitted on behalf of the Center for Biological Diversity and San Bernardino Valley Audubon Society (collectively "Conservation Groups") on the World Logistics Center Project ("Project"), located south of Interstate 60 on the eastern edge of Moreno Valley. The Project would be the largest master-planned warehouse development in U.S. history, totaling approximately 40.6 million square feet on 2,610 acres. The Project would result in significant impacts to air quality contributing tons of criteria pollutants into an area currently designated as non-attainment under the Clean Air Act, poses a significant impact to climate change, and threatens the adjacent San Jacinto Wildlife Area.

The Final Environmental Impact Report ("EIR") fails to adequately describe the Project and the environmental setting, including the creation of a fictional "CDFW Conservation Buffer Area", which effectively removes over 1000 acres from the San Jacinto Wildlife Area ("SJWA") and core reserve lands under the Western Riverside County Multiple Species Habitat Conservation Plan ("MSHCP"). The FEIR also fails to analyze a range of environmental impacts, mitigation measures, and alternatives. At a minimum, the FEIR must be revised and recirculated to remedy these deficiencies. However, because of the permanent and irreconcilable conflicts with public health and environmental protection the Project should be denied.

Response 1:

See the following detailed responses.

Comment 2:

The Center for Biological Diversity ("the Center") is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center for Biological Diversity has over 900,000 members and e-activists throughout California and the western United States, including residents of western Riverside County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in the Inland Empire.

The San Bernardino Valley Audubon Society ("SBVAS") is a local chapter of the National Audubon Society, a 501(c)3 corporation. The SBVAS chapter area covers almost all of Riverside and San Bernardino Counties and includes the project area. It has about 2,000 members, about half of whom live in Riverside County. Part of our chapter's mission is to preserve habitat in our area, not just for birds, but for other wildlife, and to maintain the quality of life in the Inland Empire.

It is well established that the purpose of an EIR is to provide public agency decision-makers and members of the public with an informational document that explains potentially significant environmental impacts and feasible mitigation measures. (Cal. Pub. Res. Code §§ 21002.1, 21061; Guidelines §§ 15121, 15151; Vineyard

Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 426-27; *Carmel Valley View, Ltd. v. Board of Supervisors* (1976) 58 Cal.App.3d 817, 821-822.) An EIR must include the full range of potentially significant impacts, as well as reasonably prudent avoidance, minimization, and mitigation measures in the EIR to comply with CEQA's information disclosure requirements. (Pub. Res. Code § 21000 et seq.) CEQA requires the planning agency to "mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." (Pub. Res. Code §§ 21002.1(b); 15126.4.) Mitigation of a project's significant impacts is one of the "most important" functions of CEQA. (*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41.) Importantly, mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development." (*Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 ((quoting Pub. Res. Code § 21081.6(b)).)

Response 2:

The comment describes CBD and SBVAS and notes the requirements of CEQA.

Comment 3:

I. THE FEIR MUST BE RECIRCULATED FOR PUBLIC REVIEW AND COMMENT

The FEIR must be recirculated since it is based on outdated or inapplicable studies and data, and significant new information substantially changes the FEIR's analyses of the Project's impacts, alternatives and required mitigation, as we explain below. (Laurel Heights Improvement Assn. v. Regents of Univ. of Cal. (1993) 6 Cal.4th 1112, 1132 (Laurel Heights).)

Under CEQA, an EIR must be re-circulated for review and comment whenever significant new information becomes known to the lead agency and is added to the EIR, after public notice of the availability of the draft document has been made, and before the EIR is certified. (Pub. Res. Code § 21092.1.) Under such circumstances the lead agency is specifically required to re-notice the environmental review document to the public and all responsible agencies, and is required to obtain comments from the same, before certifying the document's impacts, its alternatives analyses, and any mitigation measures. (See id.; see also, Cal Pub. Res. Code § 21153.) A lead agency's decision not to recirculate an EIR must be supported by substantial evidence. (CEQA Guidelines § 15088.5(e).)

"Significant new information" includes any information regarding changes in the environmental setting of the project under review. (CEQA Guidelines § 15088.5(a).) It also includes information or data that has been added to the EIR and is considered "significant" because it deviates from that which was presented in the draft document, depriving the public from a meaningful opportunity to comment upon a significant environmental effect of the project, or a feasible way to mitigate or avoid such an effect at the time of circulation of the draft. (Id.) Some examples a lead agency must re-circulate an EIR for further public comment are:

- (1) When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigation measure;*
- (2) When the new information shows a substantial increase in the severity of an environmental impact, except that recirculation would not be required if mitigation that reduces the impact to insignificance is adopted;*
- (3) When the new information shows a feasible alternative or mitigation measure that clearly would lessen the environmental impacts of a project and the project proponent declines to adopt the mitigation measure; or*
- (4) When the draft EIR was "so fundamentally and basically inadequate and conclusory in nature" that public comment on the draft EIR was essentially meaningless. (CEQA Guidelines §15088.5.)*

Recirculation is thus required when the addition of significant new information that substantially changes the FEIR's analyses of the Project's impacts, alternatives and required mitigation. (Laurel Heights, 6 Cal.4th at 1132.) Accordingly, "[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal." (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 199 (citation omitted).)

Based on the comments below and our previous comments to the draft EIR, it is clear that the FEIR must be re-drafted and re-circulated. Conditions (1) and (2) above will be met by meaningful and adequate discussion of the Project itself and the project's impact to the following: biological resources which were excluded from review, analysis of greenhouse gas emissions, water supply and availability, and water quality. Specifically, comments on the EIR provide new information about the following: the EIR's attempt to mask impacts to property owned by the California Department of Fish and Wildlife ("CDFW"), failure to disclose impacts to hydrological and riparian/riverine resources, failure to analyze the impacts of wastewater mitigation basins and special status species placed in a buffer zone adjacent to the San Jacinto Wildlife Area, failure to analyze the substantial increase in impacts to wildlife corridors, and the failure to properly analyze significant impacts disclosed in comments, new biological reports, including impacts to raptor habitat. The FEIR also fails to take into account all potential sources of greenhouse gas ("GHG") emissions from the Project and then ignores large emission sources when completing the FEIR's significance analysis. The FEIR improperly relies on AB 32's Cap and Trade Program to fully minimize and mitigate nearly 400,000 metric tons of CO2 emissions at full build out of the Project, despite readily available and feasible GHG emissions mitigation measures that would lower the Project's overall GHG emissions and contribution to climate change. Additionally, the FEIR fails to adequately account for the unreliability of water supply for this Project due to unprecedented drought and climate change conditions, and thus fails to disclose and analyze Project impacts on water supply in light of ongoing and worsening water scarcity. Condition (3) will be met because the EIR fails to incorporate feasible mitigation measures or alternatives that were provided by the public and responsible agencies after the circulation of the EIR such as realignment drainage 9 or adopting burrowing owl relocation programs. The combined effect of these omissions makes it clear that the fourth condition has also been met. Failure to address these impacts is inadequate and requires further analysis and recirculation.

Response 3:

CEQA Guidelines Section 15088.5 states that "new information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect". The impacts described in the FEIR are similar to or less than the impacts described in the DEIR. New, though not significant, information added to the document responds to comments; merely clarifies or amplifies existing information; or adds new mitigation measures, any impacts of which have been fully evaluated in the FEIR. In addition, FEIR is neither inadequate nor conclusory. None of the changes that Center for Biological Diversity (CBD) describes in its comment meet the standard requiring recirculation. Changes to the document and the inclusion of new information is not the standard for recirculation, in fact, it is the public process of CEQA.

Comment 4:

II. THE PROJECT IS IMPROPERLY ANALYZED UNDER A PROGRAMMATIC EIR

The applicant should have prepared a project EIR instead of the current programmatic EIR for this Project. A project EIR is appropriately prepared for a "construction-level project, and 'should focus primarily on the changes in the environment that would result from the development project [and] examine all phases of the project including planning, construction, and operation.'" (Citizens for a Sustainable Treasure Island v. City and County of San Francisco (2014) 227 Cal.App.4th 1036, 1047 (quoting Guidelines § 15161) (Treasure Island); see also In re Bay-Delta etc. (2008) 43 Cal.4th 1143, 1169.) A programmatic EIR, on the other hand, "evaluates the broad policy direction of a planning document, such as a general plan, but does not examine the potential site-specific impacts of the many individual projects that may be proposed in the future consistent with the plan." (Treasure Island, 43 Cal.4th at 1047; see also Guidelines §15168.)

The “level of detail in an EIR is driven by the nature of the project, not the label attached.” (Treasure Island, 43 Cal.4th at 1051.) “An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan” (CEQA Guidelines § 15146.) Since this Project proposes to develop a business park where specific information is known for each aspect of the Project, (FEIR at 1-6, 1-7), it necessarily requires the preparation of a project EIR to assess and mitigate the impacts consistent with the degree of specificity of the activities proposed. (Treasure Island, 43 Cal.App.4th at 1051-52.)

Response 4:

Due to the level of information currently available about the WLC project, a programmatic EIR is the most appropriate CEQA compliance document at this time. The EIR clearly states that more detailed CEQA analysis will be performed once more specific project-level data and plans are submitted to the City for review (future site plans, plot plans, etc.) consistent with the programmatic WLC Specific Plan (FEIR Section 3.7.2 – City of Moreno Valley – Future Approvals, p. 3-114). The Draft Environmental Impact Report (DEIR) provides mitigation at a programmatic level, but does rely on implementation at the project level once specific development plans are submitted. The DEIR mitigation measures contain sufficient performance standards so that mitigation of project impacts is not deferred but rather will be applied to future discretionary permit applications, including obtaining permits as appropriate (e.g., Streambed Alteration Agreements for onsite drainages), see MM 4.4.6.3C.

CBD’s discussion of the difference between a programmatic document and project-level document perfectly describes the WLC Specific Plan Programmatic FEIR. The project under consideration is a specific plan that serves as planning document, no project-specific information is currently known. At this time, no plot plans are being considered, future tenants are not known, and building sizes for future tenants have not been established. In short, the necessary information for a project-level document will be known when the first plot plan is proposed. The size, number, and location of buildings are unknown at present.

Comment 5:

III. THE FEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE IMPACTS TO BIOLOGICAL RESOURCES

The FEIR fails in providing the level of analysis mandated by CEQA because it fails to address numerous aspects of how the Project will affect wildlife, as well as providing a thorough analysis of the Project’s impacts to sensitive species and ecological communities. Moreover, the EIR fails to adhere to CEQA’s substantive mandate to adopt mitigation measures and alternatives to reduce a project’s significant impacts wherever feasible. The FEIR maintains several of the deficiencies outlined in comments on the Draft EIR by conservation groups, US Fish and Wildlife Service, California Department of Fish and Wildlife (“CDFW”), and the public.

A. Failure to Properly Disclose and Analyze Impacts to Biological Resources

The FEIR fails to adequately disclose and analyze the Project itself, adjacent areas of biological importance, and impacts to biological resources. Importantly the FEIR continues to rely upon land held by the California Department of Fish and Wildlife in the San Jacinto Wildlife Area as a buffer for the development, instead of relying upon the Project area itself to mitigate for its impacts to biological resources. By representing the area to the south of the Project that is owned for conservation by CDFW as a buffer for the development the EIR fails to properly disclose the existing environmental conditions in the vicinity of the Project and disclose how the Project will impact those lands already set aside for permanent conservation in contravention of CEQA. (San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus, 27 Cal. App. 4th 713, 722.)

Response 5:

The term, “CDFW Conservation Buffer Area”, is used in the EIR to distinguish the 910-acre area from the remainder of the SJWA and other lands owned by the CDFW in Section 3.4.1 of the DEIR. The “CDFW Conservation Buffer Area” is owned by the State and refers to the fact that the State purchased the property to

incorporate into the SJWA and buffer the SJWA from development to the north as: “The DFG has identified the subject properties as being within a Significant Natural Area and has recommended the purchase of the property as an addition to the existing WLA. The acquisition of the subject properties are important to the wildlife area as they will serve as a buffer from development north of the WLA and adds significant wildlife benefits to the WLA.” [emphasis added, citation from Wildlife Conservation Board Meeting Meetings, May 18, 2001, page 56]. Section 3.4 of the FEIR analyzes the impacts of the proposed project within the project boundaries, including the CDFW Conservation Buffer Area, and the beyond the project boundaries.

Comment 6:

The FEIR also fails to adequately analyze, and disclose impacts of the wastewater detention basins placed into the 250 foot buffer zone adjacent to the San Jacinto Wildlife Area. These wastewater flood control basins are proposed as equivalent or superior to existing riparian resources under the DBESP. However, flood basins require maintenance such as mowing or dredging that could preclude replacement of the riparian values proposed in the DBESP. The basins may also inhibit sediment flow and de-water rare alkaline resources at the San Jacinto Wildlife Area.

Response 6:

As stated in Section 4.9.6.3, page 4.9-56 of the FEIR the project will comply with the Water Quality Management Plan for the Santa Ana Region of Riverside County (approved by the Santa Ana Regional Water Quality Control Board October 22, 2012), which requires the use of Low Impact Development (LID) Best Management Practices (BMPs) that maximize infiltration, harvest and use, evapotranspiration and/or biotreatment. Flows from the project will be treated first by LID BMPs where the flow will be infiltrated, evapotranspired, or treated. As required by Mitigation Measure 4.9.6.1A, the treated flows will then be reduced to below or equal to pre-development conditions by routing the on-site storm water flows through a series of on-site detention and infiltration basins before flows are released off site. These basins will provide incidental infiltration and secondary treatment downstream of the LID BMPs. All runoff from the site will be treated by LID BMPs and then routed through the detention and infiltration basins before it leaves the project area and into Mystic Lake and the San Jacinto Wildlife Area. The project will comply with the Nutrient TMDL for Lake Elsinore and Canyon Lake by implementing LID-based BMPs.

Mitigation Measures 4.9.6.3A and 4.9.6.3B in the FEIR, treatment BMPs consisting of infiltration, bioretention and low impact development will be implemented. The Water Quality Management Plan complies with the NPDES and TMDL requirements and the project will direct runoff from impervious surfaces into bioretention facilities before the flow is routed to the infiltration/detention basins. The bioretention areas consist of landscaped areas that provide treatment and infiltration. Bioretention facilities will treat the runoff by infiltration, filtration through the soil media, and evapotranspiration. The detention/infiltration basins will provide additional treatment and infiltration after the flow is treated by the bioretention facilities. Note that the detention basins are not being designed as “detention basins with some infiltration capacity”, but are being designed as infiltration basins and detention basins. As noted, the water will be treated by bioretention facilities first as the primary means of treatment, and that the infiltration basins provide an additional level of treatment beyond what is required by the NPDES permit.

Since this is a programmatic EIR, it will ultimately be up to the resource agencies to determine the actual habitat value of basins planned for actual future development. However, it is anticipated each basin will have a forebay that would be engineered and regularly maintained, plus a central area for detention and infiltration which would have a maintained low flow channel but otherwise it would be sized and designed to allow habitat as well as detention/infiltration which connects to an engineered and maintained outlet. Mitigation Measures 4.4.6.1A and B (buffer/basin design), 4.4.6.3A-C (permitting), 4.4.6.4F-K (basin management process) outline various basin design and management requirements for future development.

Comment 7:

(6/25/15)

The FEIR also fails to analyze the impacts of relocation of sensitive wildlife species into the 250 buffer zone that is also proposed for wastewater detention basins or analyze the potential conflicts that the multiple uses might pose. For example, transporting burrowing owls and the Los Angeles Pocket Mouse (“LAPM”) to the same location that also includes wastewater management poses conflicts between the mitigation features, including inter-species conflicts because burrowing owls may prey on LAPM. Moreover, the 250 foot buffer does not provide a sufficient spatial area to accommodate all of these mitigation uses.

The FEIR fails to adequately analyze the impacts to sensitive species, such as the burrowing owl and LAPM. As noted in previous comments the EIR fails to adequately disclose and analyze impacts to burrowing owl. The FEIR also fails to adequately analyze impacts to LAPM because the biological surveys purport to capture similar species, such as long tailed pocket mice and desert pocket mice even though the range of those species does not include the project area. The FEIR must disclose the survey results for those species in order to determine whether the EIR provides the substantial evidence required to demonstrate that the species captured were not LAPM, which is a protected species under the MSHCP.

Response 7:

First, the two species already share habitat, and the habitat and potential impacts to both species are described in FEIR Volume 3, Revised Draft EIR, Section 4.4.6.4. More importantly, relocation efforts are not limited to the 250-foot buffer. As Mitigation Measure 4.4.6.4D states, “If suitable habitat is not present in Planning Area 30, owls may be relocated to the SJWA, the 250-foot buffer area or other suitable on-site or off-site areas.” As stated in the mitigation measure, CDFW is required to approve all relocation plans and will be able to determine if any species conflict exists.

The FEIR contains a complete analysis of the LAPM. Multiple surveys were carried out as described at FEIR p. 4.4-93 and Appendix E. There is no basis for the contention that surveys misidentified the various mouse species. Likewise, the FEIR contains an analysis of the impacts on the burrowing owl (FEIR p. 4.4-94 and Appendix E). The comment does not identify any inadequacy in the surveys.

Comment 8:

The FEIR fails to disclose impacts to wildlife corridors or analyze conflicts between the MSHCP’s requirements for wildlife corridors. The Project has the potential to impact wildlife movement between the San Timoteo Badlands, the San Jacinto Wildlife Area, Core H of the MSHCP, and Lake Perris. The Project, including building developments, road construction, and traffic, creates an obstruction to wildlife movement between these regionally important wildlife areas. The EIR also fails to adequately describe how the existing drainage 9 or mitigation to that drainage will impact potential wildlife movement. The EIR engages in a cursory dismissal of those impacts and fails to disclose the conflict with the MSHCP.

Response 8:

It should be noted that existing culverts beneath Gilman Springs Road on or near the WLC project site are often clogged with debris or sediment, which hinders their use for wildlife movement. Development of the WLC project, and eventual improvements to Gilman Springs Road, will improve drainage culverts along this portion of Gilman Springs Road and facilitate improved wildlife movement. FEIR Section 4.4.1.14.g identifies the reasons why the project will not have significant impacts on wildlife movement. Further analysis describing why the project area does not serve as a meaningful wildlife corridor is contained in the analysis found in FEIR Section 4.4.5.2. Existing site conditions, such as the presence of SR-60 to the north and the active agricultural uses of property limit the ability of wildlife to use the project area as a corridor.

The statement that wildlife movement in connection to drainage 9 is not adequately addressed is incorrect. The FEIR (p. 4.4-75) states, “In addition, although not required, Drainage 9 is being designed to allow for wildlife movement between the Badlands and the SJWA (e.g., relatively natural channel conditions with 50-foot setbacks on either side of the channel through the WLCSP property). These project design features will maintain a wildlife travel path along Drainage 9. Therefore, impacts related to wildlife movement are less than significant, and no mitigation is needed.”

Comment 9:

As summarized by the US Fish and Wildlife Service and CDFW, who are implementing agencies on the MSHCP, the FEIR fails to conform with the MSHCP:

We cannot concur with the conclusion in the DBESP until questions regarding site hydrology, assessment of riparian/riverine resources, the presence of Los Angeles pocket mouse and redirection of wildlife movement around the site are resolved and a strategy [that] is equivalent or superior to avoidance has been identified.

(FEIR App. E-16, Comment 12.) The deficiencies in the FEIR must be addressed before final consideration of the Project.

Response 9:

The commenter misrepresents the comment and does not show the original response. The agencies are discussing the DBESP process, which continue throughout the development. Below is the full comment and response:

Comment 12

We would also like to discuss the results of the Los Angeles Pocket mouse surveys, and as stated above, request copies of the latest survey reports. Prior to completion of the DBESP process, we request a hydrology report that addresses existing flows to the rare alkaline plant community on the SJWA and expected changes in those flows in the presence of the proposed basins at the southern edge of the project. We cannot concur with the conclusion in the DBESP until our questions regarding site hydrology, the assessment of riparian/ riverine resources, the presence of Los Angeles pocket mouse and redirection of wildlife movement around the site are resolved and a strategy the is equivalent or superior to avoidance has been identified.

Response:

The requested focused survey reports will be provided to the Agencies. In connection with project-specific applications, additional LAPM surveys will be prepared and processed.

A program-level Hydrology Report (September 2014 CMH2Hill) was prepared as part of the Specific Plan. Wildlife Agencies will be provided a site-specific project Hydrology Report when site-specific projects are proposed. The project is required to maintain the same amount of flows off-site after construction that currently occur pre-construction. In addition, the accumulated run-off from the impermeable surface of the project site will provide more available moisture that will be contained within the detention basins, which will then percolate and contribute to the sub-surface flows.

Comment 10:

i. The FEIR fails to adequately analyze biological impacts on riparian/riverine features and jurisdictional waterways

The FEIR fails to properly analyze the impacts to biological resources by failing to properly disclose riparian/riverine and hydrological features. The failure to properly disclose the impacts to several hydrological features also prevents the FEIR from properly conforming to the Western Riverside County Multiple Species Habitat Conservation Plan ("MSHCP"), including the failure to perform an adequate Determination of Biologically Equivalent or Superior Preservation ("DBESP") as required by the MSHCP. Failure to properly disclose the riparian/riverine and hydrological features is a necessary predicate to determining avoidance and mitigation measures that are necessary through both the programmatic and project level DBESP analysis.

The failure of the EIR to properly disclose and analyze the impacts to riparian/riverine features prohibits the Project's compliance with the Western Riverside County MSHCP. The MSHCP requires a specific analysis for riparian/riverine resources. (MSHCP Section 6.1.2). The MSHCP defines riparian/riverine areas as lands which contain habitat dominated by plants which occur close to or which depend upon soil moisture from a

nearby fresh water source, or areas with fresh water flow during all or a portion of the year. (MSHCP Section 6.1.2.) The biological studies for the Project recognize that riparian/riverine features occur in drainage features 7, 8, 9, and 12, and 15. (FEIR at 1-37, 4.4-87). Because the Project will impact these resources a Determination of Biologically Equivalent or Superior Preservation (“DBESP”) is required. (MSHCP Section 6.1.2). A DBESP analysis requires, at a minimum, a determination of whether avoidance is feasible, minimization measures for indirect impacts, mitigation that would fully offset any impacts, and a determination that mitigation proposed is biologically equivalent or superior. (MSHCP Section 6.1.2).

Response 10:

The FEIR contains a complete analysis of riparian/riverine features and necessary mitigation measures that can be found at FEIR Section 4.4.1.14.e, 4.4.3.5, and 4.4.6.3. The comment does not state how analysis failed to properly disclose impacts to riparian/riverine features. A programmatic DBESP has been prepared for the project (FEIR Appendix E-7) and Mitigation Measure 4.4.6.3B establishes the requirements for project-level DBESPs.

Comment 11:

However, the FEIR fails to conduct the analysis of riparian/riverine features and DBESP analysis required by the MSHCP. Instead, the EIR only conducts a programmatic DBESP and defers a full analysis of the Project’s impacts on riparian/riverine features and a project-based DBESP analysis until the future. (FEIR at 4.4-87, 4.4-92.) As we stated previously, the applicant incorrectly conducted a programmatic EIR despite this proposed development clearly being one project. (See Section II above.) The programmatic DBESP analysis is also improper as it segments much of the Project’s impacts into smaller phases that will improperly mask the cumulative impacts of the Project. It further defers much of the analysis and mitigation to a later phase in contravention of CEQA. For example, the FEIR states that “impacts will be mitigated through a combination of riparian habitat creation on-site, creation of riparian habitat off-site, and/or purchase of credits at an approved mitigation bank.” Appendix E-7 DBESP Analysis at 27, 31, 40 (“Project-specific mitigation measures have not been created nor approved because a program level document cannot provide that level of specificity.”) In order for a programmatic analysis to be functional it must provide enough information to demonstrate that the mitigation strategy is equivalent or superior to avoidance, but the vague and deferred nature of the DBESP precludes this information from being disclosed to the public or decisionmakers. A more defined DBESP is needed to conform to the MSHCP and CEQA’s requirements for analysis and mitigation of impacts.

Response 11:

See response to Comment 4 above regarding the programmatic nature of the environmental review.

The FEIR conducts a cumulative analysis of the project impacts (FEIR Section 4.4.7), an analysis that will be updated with subsequent environmental review necessary for project-level approval. The mitigation measures identify clear performance measures necessary to mitigate impacts. At this time, the size, location, or number of buildings are unknown. Until project-level details are known, it is not possible to determine the specific mitigation method that will be used. The performance standards that are set forth in the FEIR ensure future mitigation, while considering a programmatic environmental review.

Comment 12:

The FEIR contradicts itself in discussions regarding whether riparian habitats exist in the Project area. In analyzing consistency with applicable local General Plan Policies the FEIR states “[t]here is no riparian habitat within the Specific Plan area.” (FEIR Vol. 1 (Response to Comments) at 442.) However, the FEIR itself contradicts this statement in finding that five drainage features (Drainages 7, 8, 9, 12 and 15) were determined to be riparian/riverine under MSHCP guidelines and waters of the state subject to CDFW and RWQCB jurisdiction under Section 1600 of the Fish and Game Code and Porter Cologne Act. (FEIR at 4.4-59, 4.4-90; FEIR Vol. 1 (Response to Comments) at 438.)

Additionally, the FEIR claims that Drainage feature 14 contains “no native riparian habitat.” (FEIR at 4.4-90.) However, this is contradicted by other portions of the FEIR and the biological surveys for the project from the DEIR, which indicated that the native habitat of “southern willow scrub” occupied 0.86 acres of drainage

feature 14 and provides habitat for least Bell's vireo, and southwestern willow flycatcher. (FEIR at 4.4-14, 4.4-45; see also DEIR App. E at 54, 120; but see FEIR App. E at 67 (omitting size of southern willow scrub and dismissing habitat ability to support sensitive bird species without explaining discrepancy between this and previous study). Attempts to dismiss the riparian areas in the text of the FEIR by asserting that it does not provide suitable habitat for riparian/riverine planning species, when other portions of the FEIR and studies for the DEIR acknowledge that the area contains habitat that could be used by native wildlife runs contrary to CEQA.

The FEIR also attempts to dismiss the impacts to this riparian habitat by citing to a portion of the MSHCP, which purports to minimize the requirements to analyze impacts to riparian/riverine resources that are artificially created. (FEIR Vol. 1 (Response to Comments) at 442.) However, this does not minimize the requirement to disclose, analyze, and mitigate impacts to sensitive habitat and wildlife as required under CEQA. The FEIR goes further in masking the conflict with applicable plans by claiming that the riparian areas containing riverside sage scrub, southern willow scrub, and mule fat scrub are not natural drainage courses requiring preservation under mitigation under the Moreno Valley General Plan Policy 7.4.3. The EIR's failure to adequately disclose and analyze the Project's impacts to riparian features conflicts with and prevents a proper analysis of impacts and mitigation for the regional MSHCP and local plans.

Response 12:

The comment answers its own question by recognizing that there is a difference between riparian/riverine features and riparian/riverine habitat as defined in the MSHCP guidelines. Nonetheless, the FEIR is through in its discussion of both as discussed in RTC F-1-19 and F-1-20.

The FEIR does not dismiss the riparian/riverine areas and conducts a full analysis (FEIR, Section 4.4.6.3). It does distinguish between riparian/riverine features and habitat. The FEIR also identifies mitigation for any potential impacts, "Drainage Feature 7, 8, 9, 12, and 15 within the WLC project are considered riparian/riverine areas, as defined by MSHCP. If impacts to any of these areas cannot be avoided, a DBESP report and relevant mitigation will be required by the RCA. (FEIR p. 4.4-90)". Mitigation measures 4.4.6.3A, 4.4.6.3B, and 4.4.6.3C identify the necessary steps to reduce project impacts. Since the size, location, and number of buildings are not currently known, it is not possible to know to what degree these features can be avoided. To that end, the mitigation measure incorporate performance measures to ensure they are successful.

Additionally, the FEIR at p. 4.4-87 addresses the potential impact on least Bell's vireo and southwestern willow flycatcher, finding no impact: "The project area does not contain habitat suitable for covered riparian species, such as least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo."

Comment 13:

Finally, the FEIR fails to and must fully disclose and analyze the biological impacts to this jurisdictional waterway and discuss the potential alternatives and mitigation measures for this impact prior to project approval. Several drainage features, including drainage features 7, 8, 9, 12 and 15, are subject to the jurisdiction of the CDFW and Regional Water Quality Control Board ("RWQCB"), but site specific jurisdictional delineations, evaluations of impacts, and proposed mitigation measures are deferred. (FEIR at 4.4-90). Drainage features 12 and 15 are subject to the jurisdiction of the U.S. Army Corps of Engineers ("USACE"). (FEIR at 4.4-63.) Based on our previous comments to the DEIR, the FEIR now includes that a qualified biologist will prepare a jurisdictional delineation for any drainage channels affected by the project on and off-site. (FEIR at 4.4-91, 4.4-92.) The FEIR states that this JD will be submitted to USACE and CDFW for concurrence, and that consultation with RWQCB and CDFW may still need to be required for these permits. (Id.) This measure still fails to meet the CEQA requirement to analyze and mitigate impacts to jurisdictional waterways and associated biological and hydrological resources, especially given that it already acknowledges that several drainages are under the jurisdiction of USACE, CDFW, and RWQCB. (FEIR at 4.4-90; CEQA Guidelines §§ 15126.2, 15126.4; Pub. Res. Code § 21081.6(b).)

Response 13:

Since the size, location, and number of buildings are not currently known, it is not possible to know to what degree these features can be avoided. To that end, the mitigation measure incorporate performance measures to ensure they are successful. Mitigation measures 4.4.6.3A, 4.4.6.3B, and 4.4.6.3C identify the necessary steps to reduce project impacts.

Comment 14:*B. Failure to Adopt Feasible Mitigation Measures and Deferral of Mitigation*

The EIR's attempt to rely upon a programmatic analysis of the specific plan leads to an improperly vague deferral of mitigation measures. The FEIR states that "impacts will be mitigated through a combination of riparian habitat creation on-site, creation of riparian habitat off-site, and/or purchase of credits at an approved mitigation bank." (FEIR App. E-7 DBESP Analysis at 27, 31, 40 ("Project-specific mitigation measures have not been created nor approved because a program level document cannot provide that level of specificity.")) However, this fails to provide the level of detail required to determine whether the EIR will meet the standards for biologically or superior equivalence as required by the MSHCP and the EIR's commitment to those standards to mitigate impacts to biological resources.

Response 14:

The mitigation measures are not vague; the measures specifically outline what is required to mitigate project-level impacts. Any project-level mitigation will also be subject to subsequent environmental review. Ultimately, it will be the resource agencies that will determine if the project-level mitigation meets the standards established in the mitigation measure and any additional requirements that the resource agency has.

Comment 15:

The FEIR improperly rejects several specific mitigation measures proposed by the US Fish and Wildlife Service and CDFW. The FEIR fails to adopt feasible mitigation for the realignment of drainage 9 without any substantial evidence ("realignment of the entire drainage from Gilman Springs Road to the habitat associated with the SJWA is not feasible.") (FEIR App. E-16, Response to Comment 10.) The lead agency cannot simply dismiss CEQA's substantive mandate to mitigate impacts with conclusory statements. The EIR also rejects fencing along Gilman Springs Road in order to address the impacts from the Project on wildlife movement due to obstructions and increased traffic. (FEIR App. E-16, Response to Comment 4.) The FEIR asserts that it cannot coordinate with the County of Riverside on fencing the area northeast of Gilman Springs Road because the Project owner is not the owner of that property. However, there is no evidence that the project proponent or lead agency even approached the County about implementing such a mitigation measure. This mitigation measure would also be a proper subject for any annexation proceedings that are necessary for the Project.

Response 15:

The response to US Fish and Wildlife Service and CDFW does not simply dismiss suggested mitigation. Instead, it offers a clear explanation as to why it is unnecessary, "There is also a secondary crossing (4 foot x 4 foot) further to the south that also conveys flows to Drainage 9. These box culverts meet the minimum requirements to provide wildlife movement for the target species as discussed in the MSHCP (mountain lion). The box culverts feed directly into Drainage 9 and no realignment of the drainage is required. (FEIR App. E-16, Response to Comment 10)".

With regard to the fencing of the area northeast of Gilman Springs Road, mitigation measures that are outside the jurisdiction of the City of Moreno Valley are infeasible since the City has no ability to control the timing or manner of implementation or even if such mitigation measures would be implemented at all.

Comment 16:

The EIR also fails to adopt feasible mitigation measures to reduce the Project's impacts to special status species, such as the burrowing owl. The US Fish and Wildlife Service and CDFW requested that a relocation plan be developed for any burrowing owls that may be found on the project site because burrowing owls have been found on the project site in the past. (FEIR App. E-16, Comment 4.) However, the EIR takes the legally

untenable position that the FEIR and specific plan are “not a vehicle to establish/enforce environmental mitigations nor does the City of Moreno Valley... place conditions on th[ese] documents.” (FEIR App. E-16, Response to Comment 4.) This clearly misinterprets CEQA’s requirements that mitigation measures be concrete and enforceable.

Response 16:

The comment misrepresents the response contained in FEIR Appendix E-16. The comment does not say the “FEIR and Specific Plan” as the Specific Plan is a planning document and not the vehicle for mitigation. The comment then goes on to say to discuss the requirements of the MSCHP Consistency Analysis and mitigation measures contained within the FEIR. The response concludes by stating that the mitigation CDFW is seeking (burrowing owl relocation plan) is already required by the MSCHP Consistency Analysis and is included as Mitigation Measure MM Bio-6g.

Comment 17:

IV. THE FEIR’S GREENHOUSE GAS EMISSIONS ANALYSIS IS INADEQUATE AND INCOMPLETE

The FEIR’s analysis of the Project’s greenhouse gas (“GHG”) emissions is woefully inadequate and is misleading to the public and decisionmakers about the true scope of the Project’s GHG emissions. (See FEIR Sec. 4.7.) The FEIR fails to take into account all potential sources of GHG emissions from the Project and then ignores large emission sources when completing the FEIR’s significance analysis. Most troublingly, the FEIR refuses to take responsibility for and minimize a large portion of the Project’s GHG emissions. (FEIR at 4.7-40-49.) This approach violates CEQA requirement that an EIR fully analyze and attempt to mitigate all significant direct and indirect impacts of a project. (CEQA Guidelines § 15126.2; Pub. Res. Code § 21002.) The FEIR, however, fails to adopt all feasible mitigation measures to address all of the Project’s tremendous GHG emissions and instead addresses only a small fraction of the Project’s overall GHG emissions with meager and insufficient mitigation measures. (Compare 19,237 metric tons (“mt”) of CO₂ with 490,010 mt of CO₂; FEIR 4.7-40.) Therefore, the FEIR’s significance analysis and mitigation measures for the Project’s anticipated GHG emissions are inadequate under CEQA. The FEIR should be revised to comply with CEQA and recirculated to the public and decisionmakers.

Response 17:

The comment does not state what GHG emissions are being ignored. The FEIR addresses all sources of GHG emissions and adopts all necessary mitigation to reduce impacts to a less than significant level, see FEIR Section 4.7.

Comment 18:

Action to address climate change becomes ever more urgent with each passing day. The National Oceanic and Atmospheric Administration (“NOAA”) and National Aeronautics and Space Administration (“NASA”) confirmed that 2014 was the hottest year ever recorded. (NASA 2015.) In the National Climate Assessment released by the U.S. Global Change Research Program, experts make clear that “reduc[ing] the risks of some of the worst impacts of climate change” will require “aggressive and sustained greenhouse gas emission reductions” over the course of this century. (Melillo 2014.) Indeed, humanity is rapidly consuming the remaining “carbon budget” necessary to preserve a likely chance of holding the average global temperature increase to only 2°C above pre-industrial levels. According to the Intergovernmental Panel on Climate Change, when non-CO₂ forcings are taken into account, total cumulative future anthropogenic emissions of CO₂ must remain below about 1,000 gigatonnes (Gt) to achieve this goal.¹ Some leading scientists—characterizing the effects of even a 2°C increase in average global temperature as “disastrous”—have prescribed a far more stringent carbon budget for coming decades. (Hansen 2013.) Climate change will affect California’s climate, resulting in such impacts as increased temperatures and wildfires, and a reduction in snowpack and precipitation levels and water availability, as we detail below.

In order to help stabilize the climate and avoid catastrophic impacts to our environment, the California legislature and Governor Brown have taken important steps. California has a mandate under AB 32 to reach

1990 levels of GHG emissions by the year 2020, equivalent to approximately a 15 percent reduction from a business-as-usual projection. (Health & Saf. Code § 38550.) Based on the warning of the Intergovernmental panel on Climate Change and leading climate scientists, Governor Brown issued an executive order in April 2015 requiring GHG emission reduction 40 percent below 1990 levels by 2030. (Executive Order B-30-15 (2015).) The Executive Order is line with a previous Executive Order mandating the state reduce emission levels to 80 percent below 1990 levels by 2050 in order to minimize significant climate change impacts. (Executive Order S-3-05 (2005).) In enacting SB 375, the state has also recognized the critical role that land use planning plays in achieving greenhouse gas emission reductions in California.²

The state Legislature has found that failure to achieve greenhouse gas reduction would be “detrimental” to the state’s economy. (Health & Saf. Code § 38501(b).) In his 2015 Inaugural Address, Governor Brown reiterated his commitment to reduce greenhouse gas emissions with three new goals for the next fifteen years:

- Increase electricity derived from renewable sources to 50 percent;
- Reduce today’s petroleum use in cars and trucks by 50 percent;
- Double the efficiency of existing buildings and make heating fuels cleaner.

(Brown 2015 Address.) Although some sources of GHG emissions may seem insignificant, climate change is a problem with cumulative impacts and effects. (Ctr. for Biological Diversity v. Nat’l Highway Traffic Safety Admin., (9th Cir. 2008) 538 F.3d 1172, 1217 (“the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis” that agencies must conduct).) One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California’s climate as a whole. Therefore, CEQA requires that an EIR consider both direct and indirect impacts of a project and fully disclose those impacts to adequately inform the public and decisionmakers. (CEQA Guidelines, § 15064.) Here, the FEIR failed to meet this requirement.

Response 18:

The FEIR analyzed both direct and indirect sources of GHGs, see FEIR Volume 3 Section 4.7.

Comment 19:

A. The FEIR Significance Analysis of the Project’s GHG Emissions Should Take into Account All GHG Emissions from the Project

At full build out the Project is anticipated to emit 415,991 mt of CO₂ without mitigation measures. (FEIR Air Quality, Greenhouse Gas, and Health Risk Assessment Report: 294 [hereinafter “HRA Report”].) However, when analyzing the significance of the Project’s GHG emissions and considering potential mitigation, the FEIR looked only at portion of these emissions. Specifically, the FEIR examines the significance and potential mitigation of only 19,237 mt of CO₂. The FEIR justifies ignoring the remaining 396,754 mt of emissions by arguing these emissions are independently covered by AB 32’s Cap and Trade Program. (FEIR HRA Report at 284-5.) Emissions disregarded by the FEIR are the vast majority of the emissions resulting from the Project, including mobile, electricity, construction fuel, yard trucks, electricity to convey water, generator, forklifts used on the site. (FEIR HRA Report at 294.) Instead, the FEIR focuses on so-called uncapped emissions which include waste, land use change, refrigerants that result in 19,237 mt of emissions. (FEIR, App, D at 284-5.) This approach allows the FEIR to focus only on approximately 21% of the Project’s GHG emissions and conclude the Project with only a few mitigation measures will result in no significant impacts. This approach is flawed, misleading and violates CEQA.

The FEIR justifies its significance threshold and analysis by citing to San Joaquin Valley Air Pollution Control District’s and South Coast Air Quality Management District’s use of a similar approach when they were acting as lead agencies on other projects. (FEIR at 4.7-41.) However, while the significance threshold and analysis may have been based in part of existing thresholds, compliance with the law is not enough to make a finding of less than significant under CEQA. (See *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107.) Instead “the EIR’s discussion of impacts must “provide[] sufficient

information and analysis to allow the public to discern the basis for the agency's impact findings. Thus the EIR should set forth specific data, as needed to meaningfully assess whether the proposed activities would result in significant impacts." (*Sierra Club v. Tahoe Reg'l Planning Agency* (2013) 916 F. Supp. 2d 1098, 1146-1147 (*Sierra Club*)). The FEIR fails to meet this CEQA requirement and instead leaves the public and decisionmakers uncertain on the Project's true environmental impacts and avoid necessary steps to reduce those impacts.

The FEIR anticipates emissions for the Project as far as 2030 and at full build out of the Project beyond. However, AB 32 Cap and Trade program currently runs only until 2020. (See <http://www.arb.ca.gov/cc/capandtrade/capandtrade.htm>.) Currently, there are no provisions for the Cap and Trade program to extend beyond 2020 and the scope of the program beyond 2020 is uncertain. Nonetheless, the FEIR relies on AB 32's Cap and Trade Program to fully minimize and mitigate nearly 400,000 mt of CO2 emissions at full build out of the Project. This reliance by the FEIR is without any evidentiary basis and should either be removed or substantially revised.

Response 19:

The FEIR appropriately relies on AB32 and the Cap and Trade program to address greenhouse gases. The commenter claims that there is no provision for AB32 to extend beyond 2020. This is incorrect. AB32 states the following at Section 38551: "(a) The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed. (b) It is the intent of the Legislature that the statewide greenhouse gas emissions limit continue in existence and be used to maintain and continue reductions in emissions of greenhouse gases beyond 2020." SB32, now under consideration amends AB32 to achieve greater emission reductions by 2050.

As long as AB32 and Cap and Trade remain in effect, the State has created a pool of allowable carbon emissions from select emission source sectors (e.g., fuels and energy). The size of the pool of allowable carbon emissions (known as allowances) is set by the State and is independent of the need of any project. To the degree that user of carbon emissions reduces demand, other users of carbon emissions can use up the available capacity. Since price of the allowances is determined by demand, any reduction in demand will not mean fewer emissions (which set by the establishment of the available pool by the State), it will mean lower prices for the remaining users of carbon emissions. In this manner, users that can reduce their need for allowances at a lower cost than the market price for an allowance will do so, resulting in the reduction of carbon emissions to the level established by the State at the lowest possible cost. Other carbon users will then be able to purchase the remaining allowances due to reduced demand and price resulting in no change in carbon emissions.

Because of the policies put in place by the State of California, the FEIR appropriately takes responsibility for those emissions over which it has direct control (uncapped emissions not part of the State's Cap and Trade program), but not the emissions for which the State has already set an aggregate cap which WLC project has no ability to influence. These issues are fully described in the FEIR Volume 3, Revised Draft EIR, Section 4.7.

Comment 20:

The FEIR also fails to adequately explain how it categorizes certain categories as capped and others as uncapped. For example, the FEIR fails to take into account vehicles miles traveled into its GHG significance analysis or adoption of mitigation measures. (FEIR at 4.7-47-48.) The FEIR acknowledges that vehicles miles traveled is the Project's biggest contributor to GHG emissions but disregards it completely when discussing the significance of the Project's impacts. The FEIR justifies this determination by citing to SJVAPCD determination in an independent and unrelated context. The FEIR must include a clear description of the Project's impacts and provide a detailed explanation of its analysis of those impacts. (*Sierra Club, supra*, 916 F. Supp. 2d at 1146-47.) Simply citing to other regulatory approaches in the state is insufficient. The FEIR explanation of other "capped" sectors is similarly vague and inadequate. The FEIR should further explain its classification of "capped" and "uncapped" sectors and recirculate a revised GHG analysis.

Response 20:

Both the FEIR and Air Quality Appendix (Appendix D), both describe how the FEIR differentiates between capped and uncapped emissions. Section 3.4.3 of the Appendix D states the following:

“In addition, the Scoping Plan differentiates between “capped” and “uncapped” strategies. “Capped” strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the cap-and-trade program will help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve a sufficient amount of reductions by 2020 to achieve the emission target contained in AB 32. “Uncapped” strategies that will not be subject to the cap-and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional greenhouse gas emission reductions.”

Tables identifying the capped and uncapped emissions, consistent with the Cap and Trade program, are found through Section 4.7 of the FEIR and Appendix D.

The comment contends that the FEIR does not take into account vehicle miles travelled (VMT) into its GHG analysis. First, VMT does not generate GHGs, the combustion of fuel does. The FEIR estimates the GHGs produced from transportation fuels based upon VMT. So, in an indirect way the analysis does take into account VMT in its GHG analysis. Since the GHGs result from fuel combustion, that source of GHGs fall within the transportation fuel/mobile source category that is part of CARB’s capped emissions under AB32. Mobile sources, with all other GHG sources, can be found in Table 4.7.J in FEIR Section 4.7.

Comment 21:

As noted above, the goal of AB 32 is to reduce California greenhouse gas emissions to 1990 levels by 2020. (Health & Saf. Code § 38550.) Recent science, however, indicates that far steeper reductions are necessary to avoid the most significant impacts of climate change. Even to stabilize atmospheric CO₂ concentrations at 450 parts per million (“ppm”) and limit global average temperature increases to 2°C—a level at which devastating effects may still occur—industrialized countries will have to reduce emissions by 25-40% below 1990 levels by 2020. Many scientists believe that avoiding the worst impacts of climate change will require reducing the concentration of CO₂ in the atmosphere to 350 ppm or below, which will require even steeper and more rapid reductions. The FEIR must analyze the cumulative significance of the Project’s emissions in light of reductions needed to avoid contributing to these physical impacts, not just measure them against the AB 32 Scoping Plan, regional significance thresholds and the state’s renewable generation goals. This was further emphasized in the Scoping Plan itself which emphasized the steep reductions in GHG emissions that must occur after 2020 to stabilize the climate. (2008 Scoping Plan at 33; see also Climate Change Scoping Plan 2014 Update.) The FEIR cannot rely on AB 32 Cap and Trade Program to avoid its own obligation to fully analyze and mitigate all of the Project’s GHG emissions.

B. The FEIR Fails to Consider Mitigation Measures and Alternative to Minimize All Sources of GHG Emissions from the Project

Mitigation of a project’s environmental impacts is one of the “most important” functions of CEQA. (Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30, 41.) Therefore, it is the “policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects.” (Pub. Res. Code § 21002.) Here however, the FEIR adopts only a few mitigation measures, all of which are inadequate to address the Project’s massive GHG emissions. (FEIR at 4.7-48.)

Additionally, to comply with CEQA, mitigation measures must be “fully enforceable through permit conditions, agreements, or other legally-binding instruments.” (CEQA Guidelines § 15126.4(a)(2).) The measures must be “incorporated into the project or required as a condition of project approval in such a way that [would] ensure their implementation.” (Fed’n of Hillside and Canyon Assoc. v. City of Los Angeles, (2000) 83 Cal. App. 4th

1252, 1262 (Federation).) CEQA also requires the adoption of all feasible mitigation measures that would reduce the environmental impacts of a project. (Pub. Res. Code § 21002; CEQA Guidelines § 15126.4(c); City of Marina v. Bd. of Trs. of the Cal. State University (2006) 39 Cal.4th 341, 369-70.)

Although the Project includes a curtailed list of measures directed at reducing emissions and promoting sustainability, these strategies are severely limited and do not include many feasible mitigation measures. (FEIR at 4.7-47.) The meager steps incorporated into the Project includes no enforcement mechanisms and leaves many feasible mitigation measures out completely. (FEIR at 4.7-48.) The mitigation measures are often vague with no specific quantities or binding obligations. (Id.) The FEIR justifies this approach in part by stating that it must mitigate only uncapped emissions resulting from the Project. (FEIR at 4.7-47-49.) However, as noted above, this approach is flawed and without evidentiary or legal support. The FEIR cannot simply ignore 80% of the Project's GHG emissions and their resulting environmental impacts when adopting mitigation measures. The FEIR subsequent conclusion that its limited mitigation measures will ensure the Project's GHG emissions will have significant impacts is misleading. The Project will in fact do nothing to mitigate 396,754 mt of CO2 emissions resulting from the Project.

Available and feasible mitigation measures during construction and operation of the Project would lower the Project's overall GHG emissions and contribution to climate change. California Air Pollution Control Officers Association ("CAPCOA") has identified existing and potential mitigation measures that could be applied to projects during the CEQA process to reduce a project's GHG emissions. (CAPCOA 2010.) The California Office of the Attorney General also has developed a list of reduction mechanisms to be incorporated through the CEQA process. (CA AG 2010.) These resources provide a rich and varied array of mitigation measures that should be incorporated into the revised Project.

For example, as it stands now, rooftop solar power is the most energy efficient, least-environmentally damaging form of renewable energy available for the Project and is ideal for the Project's location. The Project's current on-site renewable energy goals are, however, too modest in scope with only 5.2% of electricity from the Project coming from solar at the end of build out. (FEIR at 4.7-50.) The conservation group urges firm requirements that onsite renewable energy be used to meet at a minimum 30% of the Project's energy use and each subsequent 5 year period include growing reliance on onsite renewable energy to meet its energy demands. These renewable energy use targets should be required mandates to ensure the necessary measures are incorporate into future design plans for the Project. New construction, like this Project, has a unique opportunity to full embrace and incorporate the use of renewable energy in its design, construction and operation. Mitigation measures to reduce vehicle miles traveled, energy use, waste, water consumption, greater use of solar power, hybrid vehicles, LEED certification and others could also all lower the Project's impact on climate change. (CAPCOA 2010; CA AG 2010.)

The FEIR acknowledges that the Project will result nearly 400,000 mt of CO2 emissions but does little to fully analyze, minimize or mitigate the environmental impacts resulting from the Project's GHG emissions. The FEIR's GHG significance analysis and determination on what mitigation measures are necessary was flawed and raises serious concerns about the Project and its impacts on the region as well as the state. The FEIR's determination that with mitigation, the Project will result in no significant GHG emissions is grossly misleading to the public and decisionmakers and violates CEQA. We urge that the FEIR be revised and recirculated to address these concerns and ensure that the Project's substantial GHG emissions are clearly disclosed, adequately analyzed and fully mitigated.

Response 21:

The commenter is incorrect, the EIR does contain a number of mitigation measures that will significantly reduce GHG emissions from the WLC project, both during construction and operation. Mitigation Measure 4.7.6.1A deals with solid waste reduction, but the following additional measures are in Section 4.3, Air Quality, and they also contribute to reductions in GHG emissions:

- 4.3.6.4A** Requires Class II bike lanes, participation in the County’s rideshare program, providing bicycle storage and changing rooms, providing lockers for employees (to facilitate riding bicycles and taking transit to work), assuring there are safe pedestrian connections between buildings to facilitate walking, and providing parking for fuel-efficient vehicles.
- 4.3.6.3B(l)** Requires all development to use model year 2010 medium- and heavy-duty trucks or later.

It should be noted the Mitigation Monitoring and Reporting Program (FEIR Volume 1) outlines how these measures will be implemented by future development within the WLC project.

However, the greatest reduction for potential future GHG emissions is from vehicular fuel emission reductions through the State’s Cap and Trade program. As long as AB32 and Cap and Trade remain in effect, the State has created a pool of allowable carbon emissions from select emission source sectors (e.g., fuels and energy). The size of the pool of allowable carbon emissions (known as allowances) is set by the State and is independent of the need of any project. To the degree that user of carbon emissions reduces demand, other users of carbon emissions can use up the available capacity. Since price of the allowances is determined by demand, any reduction in demand will not mean fewer emissions (which is set by the establishment of the available pool by the State), it will mean lower prices for the remaining users of carbon emissions. In this manner, users that can reduce their need for allowances at a lower cost than the market price for an allowance will do so, resulting in the reduction of carbon emissions to the level established by the State at the lowest possible cost. Other carbon users will then be able to purchase the remaining allowances due to reduced demand and price resulting in no change in carbon emissions. Ultimately, mitigation of fuel-based GHG emissions (or any capped emissions) will not result in reductions of GHG emissions since other allowance users will be able to emit additional emissions. Only the State can adjust the cap and modify the State’s long-term GHG reduction goal.

Finally, the FEIR concludes that the construction and operation of the WLC will not have a significant GHG impact (see FEIR Section 4.7.7, pages 4.7-59 and 4.7-60).

Comment 22:

V. THE FEIR FAILS TO ESTABLISH AN ADEQUATE AND ACCURATE ENVIRONMENTAL BASELINE REGARDING WATER SUPPLY

The FEIR presents an improper environmental baseline regarding the availability of water resources in the region, alluding to the unreliability of water supply as well as current and likely future water scarcity in California while still relying on unsubstantiated and outdated assumptions. (Guidelines § 15125 (EIR must include description of physical environmental conditions in the vicinity of the Project at the time of the notice of preparation is published or at the time when environmental analysis is commenced).) This failure violates the EIR’s fundamental purpose to serve as an informational document to inform decision-makers and the public of any significant adverse effects on the physical environment. (Guidelines §§ 15121, 15125; Neighbors for Smart Rail v. Exposition Metro (2013) 57 Cal.4th 439, 447 (Neighbors).) The FEIR discusses existing water supply conditions based on the Project’s Water Supply Assessment, which relies on the 2010 Urban Water Management Plan (“UWMP”) provided by the Eastern Municipal Water District (“EMWD”) that is responsible for supplying water for the Project. (FEIR at 3-45; FEIR, App. M (Water Supply Assessment) at 19, 22-23 (hereinafter “WSA”).) In turn, the UWMP relies in large part on the Metropolitan Water District (“MWD”)’s 2010 Regional Urban Water Management Plan (“RUWMP”), since EMWD imports at least 65% of its water from MWD. (WSA at 5, 21.)

Specifically, in establishing water supply estimates in the 2010 RUWMP MWD “assumed a new Delta conveyance [i.e. Bay Delta Conservation Plan, or Twin Tunnels project] is fully operational by 2022 that would return supply reliability similar to 2005 condition.” (2010 RUWMP at 2-16.) The draft BDCP and associated EIR/Environmental Impact Statement (“DEIS”) was not released until almost two years after the notice of preparation for this EIR. (2013 Public Review Draft BDCP.) The BDCP has still yet to be approved as of the writing of this comment letter, and will not deliver additional water supply even if it is approved in 2015 since

the tunnels will take at least 11-12 years to construct. (BDCP 2013 at 6-3; BDCP 2015.) Based on the reliance on this false assumption the FEIR overestimates the actual availability of water resources in the area, thwarting agencies' and the public's ability to evaluate whether Project impacts on these resources are significant. (Guidelines §§ 15121, 15125; Neighbors, supra, 57 Cal.4th at 447.) The FEIR must be revised in order to provide an accurate description of actual instead of theoretical environmental conditions regarding water supply for the Project. Additionally, the environmental baseline must be revised to incorporate significant new information regarding the ongoing drought crisis and future water scarcity due to climate change, which we discuss in the following section.

VI. THE FEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE IMPACTS ON WATER SUPPLY

The FEIR conducts an inadequate analysis replete with inconsistencies and contradicting conclusions regarding water supply impacts that will result from the Project. Furthermore, the FEIR provides contradicting statements regarding mitigation measures are required to address Project water supply impacts, proposes unenforceable mitigation measures, and defers formulation of mitigation measures.

A. Failure to Properly Disclose and Analyze Impacts on Water Supply

A firm water supply is required for a project to gain approval. (Govt. Code § 66473.7; Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 432 (EIR must demonstrate a reasonable likelihood that a water source the provider plans to use will be available at least in substantial part to supply project's needs) (Vineyard); Santa Clarita Org. for Planning v. County of Los Angeles (2003) 106 Cal.App.4th 715, 723-24 (EIR's water supply impacts analysis cannot rely upon demonstrably illusory supplies).)

The Project will use approximately 1991 acre-feet of potable water per year mainly for landscape irrigation purposes. (FEIR App. M (Water Supply Assessment) at 19; FEIR at 4.16-19.) The WSA does not provide the specific water sources for the Project except that groundwater will not be used. (WSA at 9.) This quantity of water has been determined by the Project WSA to be within the limits of projected demand accounted for in the 2010 EMWD UWMP. (WSA at 19, 22-23.)

Based on this WSA the FEIR concludes that there is adequate, reliable water supply for this Project for industrial uses, and no significant water supply impacts regarding industrial uses will result from this Project and no mitigation measures will be required. (FEIR at 4.16-14; 4.16-20.) However, the FEIR acknowledges that potable water supply is unreliable and MWD is "engaged in planning processes that will identify solutions" to meet Project demands, and that Project impacts on regional water supplies may be significant and mitigation measures are required. (Id.) Similarly, although the FEIR states that water supply impacts will be less than significant with mitigation based on the EMWD water supply assessment, it also provides that "the supply of water imported from the State is not currently guaranteed, so there may be significant impacts related to long-term water supply." (FEIR at 1-85, 4.16-21 (emphasize added).)

The acknowledgment of the FEIR that there is no guaranteed supply of imported water is significant and concerning since the WSA states that EMWD imports 65% of its water supply through the MWD and is expected to satisfy future demands from the Project. (WSA at 5, 21.) In reality, EMWD imports 68% of water from MWD. (EMWD 2015c at 5.) Additionally, water supplies from MWD are even less reliable than the FEIR and WSA allude to for the following reasons that the FEIR fails to but must address.

First, in April 2015 MWD reduced its water delivery by 15% in light of the current drought, which amounts to a 300,000 AF reduction in deliveries to member agencies. (MWD 2015; see also MWD Water Cuts LA Times 2015.) The Water Shortage Contingency Plan ("WSCP") and the MWD 2010 RUWMP that the WSA relies on to conclude that EMWD will be able to meet projected demands under "a repeat of historic drought scenarios," (WSA at 21,) is inadequate to address unprecedented current and future drought situations. (2010 RUWMP at A.4-50-51 (incorporating drought planning based on 1991 & 1992 drought conditions).) Furthermore, in light

of the Governor's drought executive order, the State Water Resources Control Board (SWRCB) has mandated that EMWD reduce water use by 28%, which EMWD has begun to implement by requiring a 50% reduction in outdoor irrigation within the district. (EMWD 2015b; EMWD 2015c.)

Additionally, the FEIR also fails to take into account the current as well as likely worse and extended drought conditions in the context of climate change in order to accurately assess Project impacts on water supply. Numerous studies have shown that southwestern United States, which includes California, is very likely in or will very likely enter a megadrought over the length of 10 years due to climate change. (Ault 2014; see also Rice 2014.) Additionally, there is an 80% chance that the Southwest will experience an unprecedented megadrought that would last more than three decades, between 2050 and 2099. (Cook 2015.) In the mean time, this region will experience additional droughts leading up to the megadrought. (Cook 2015.) A recent study regarding droughts in California concluded that anthropogenic climate change has resulted in and will continue to result in the co-occurrence of warm and dry periods in California, which in turn will exacerbate water shortages, groundwater overdraft, and species extinction. (Diffenbaugh 2015.)

EMWD's plan to supplement existing supplies at the local level to reduce Project impacts on water supply via developing additional local water resources and efficiency measures are also based unsubstantiated promises. (FEIR at 4.16-14 & 4.16-17-18; WSA at 7 & 8.) The Project proposes to use recycled water to meet its non-potable water demands, but EMWD has limited capability to produce recycled water, and future expansions of recycling water in the district is only theoretical or in planning stages. (FEIR at 4.16-18 (majority of irrigated landscaped areas within the Project will be designed to use recycled water "to the greatest extent possible when it becomes available"); but see WSA at 13, 22 ("recycled water may be available for the project" in the future.)

Furthermore, the FEIR anticipates that imported water supplies could be reduced on the condition that MWD's ability to deliver water is reduced, (FEIR at 4.16-18), but fails to take into account the fact that this condition has occurred where MWD has reduced deliveries to its member agencies by 15% due to the drought, and that the BDCP will not provide additional water for the Project at build out even if it is approved in the near future. (MWD 2015; see Section V above.) For these reasons, the FEIR fails to address and must be recirculated to adequately analyze Project impacts on water supply in light of on-the-ground drought and climate change conditions that have resulted in significantly less water supply to EMWD and therefore Project impacts on water supply. (CEQA Guidelines §§ 15088.5, 15121, 15125; Neighbors, supra, 57 Cal.4th at 447Laurel Heights Improvement Assn. v. Regents of University of California (1989) 6 Cal.4th 1112, 1136.

Response 22:

The FEIR fully analyzes the project's water supply demand, the available sources of water, impacts to the water supply, and discusses the basis of EWMD WSA. These discussions can be found detailed in FEIR Section 4.16. In Section 4.16, the FEIR establishes how changing demand will allow EWMD to meet projected "demand through 2035 even under a repeat of a worst drought scenario" (p. 4.16-15), how EWMD determined future demand (p. 4.16-16 – 4.16-17), considered the impact of climate change and drought (p. 4.16-17 – 4.16-18), how EWMD water demand planning has been based upon the General Plan and the Moreno Highlands Specific Plan that would use five times as much water as the WLC Specific Plan (p. 4.16-19), and how the estimated project water demand is current worst case scenario that may overestimate water demand by four times (p. 4.16-19). For all of these reasons, the assessment of water supply and the conclusion of no significant impact contained in the FEIR are sound (p. 4.16-21).

Comment 23:

B. Failure to Adopt Feasible Mitigation Measures and Deferral of Mitigation

The FEIR provides contradicting statements regarding whether mitigation measures for water supply impacts are required in order to reduce impacts on water supply to a less than significant level. Mitigation measures include the use of drought tolerant landscaping, "dry" cleaning equipment, a recirculation system of any outdoor feature, and use of reclaimed water for irrigation "if it becomes available." (FEIR, at 1-20; see also

4.16-20 & 4.16-21.) Yet the FEIR also provides that no water supply mitigation measures are necessary because EMWD will supply sufficient water to meet existing and future potable water demands (but only once planned groundwater storage improvement are completed). (FEIR at 1-83.)

The FEIR also improperly defers formulation of mitigation measures, to a later time when the development of specific plots is considered. This deferral of developing feasible and enforceable mitigation measures for additional water supply impacts frustrates informed decision-making and violates CEQA. (CEQA Guidelines § 15126.4(a)(1), (2).) The EIR's admission that the Project would result in significant water supply impacts required the adoption of all "feasible alternatives or mitigation measures available which would substantially lessen" these impacts. (Pub. Res. Code § 21002; CEQA Guidelines § 15021(a); *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 360.) Mitigation measures must be feasible and enforceable. (CEQA Guidelines § 15126.4(a)(1), (2); CEQA § 21081 (mitigation measures must be fully enforceable).) Similarly, the EIR must contain performance criteria upon which mitigation measures will be based. (CEQA Guidelines § 15126.4(a)(1)(B) (formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the Project and which may be accomplished in more than one specified way.); *City of Long Beach v. Los Angeles Unified Sch. Dist.* (2009) 176 Cal.App.4th 889, 915 ("Impermissible deferral of mitigation measures occur when the EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR."); *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 281 (a performance standards (in this case draft habitat conservation plan for managing a preserve) can be relied on if it contains specific details including assurance that standards will be satisfied at a particular time and manner).)

Instead, the FEIR instructs that the developer "shall submit landscape plans that demonstrate compliance with the World Logistics Center Specific Plan" and state laws only prior to the approval of each individual grading permit for each plot, without providing any criteria for which to evaluate how these plans would be required to reduce Project impacts to less than significant levels. (FEIR at 1-85, 4.16-20.) Similarly, the FEIR provides that the applicant will only need to implement water-efficiency designs for each building "to the satisfaction of the Land Development Division/Public Works," (Id. at 1-86, 4.16-21) and wash down and all irrigation systems will use recycled water "if it comes available." (Id. at 1-87, 4.16-21.) None of these mitigation measures satisfy CEQA requirements to establish feasible, measurable, and enforceable mitigation measures at the EIR level. (Guidelines § 15126.4(a)(1)(B).)

Importantly, the WSA states the developer is required to meet with EMWD staff to develop a plan of service, and that the service plan could reduce the amount of water available for the Project through on-site improvements. (WSA at 22; FEIR at 3-45, 4.16-18.) However, since this service plan has not been prepared to date, the FEIR has improperly deferred the first step to establishing feasible, enforceable mitigation measures. (FEIR at 4.16-18.) Even if additional water supplies materialize, Project water supply will still be inadequate since the WSA and FEIR explicitly state that EMWD depends on MWD to supply water for future development as well as additional water during dry years, as discussed earlier. (FEIR at 4.16-16 ("the EMWD depends on Metropolitan to supply additional water during dry years") & 4.16-18 ("the majority of water for future development would be supplied by imported water from Metropolitan").) Furthermore, the FEIR has failed to assess the impacts of developing additional local water resources and efficiency measures. (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 373 (in light of uncertainty of Project water supplies, the EIR must analyze and disclose the environmental consequences of tapping other resources).

The FEIR also does not incorporate the mitigation measure of requiring gray water systems as promised by the WSA. (CEQA § 15126.4.) Although the WSA states that the Project may be conditioned to construct separate potable and recycled water systems, and to construct off-site recycle water facilities, this recommendation is not incorporated in FEIR (WSA at 22; FEIR at 4.16-20 & 21.) Even if the Project applicant decides to build indoor gray water systems, EMWD does not have capacity to produce sufficient recycled water to satisfy Project water demands given that the use of recycling systems will occur only if recycled water becomes available as stated

above. (*Id.*) Furthermore, even if it becomes feasible using recycled water for irrigation will not be implemented prior to the activities, violating the CEQA requirement that mitigation measures should be implemented by the start of the Project. (*POET, LLC v. State Air Resources Bd. (2013) 218 Cal.App.4th 681, 740 (agency improperly delayed implementing mitigation measures while project went forward.)*; see FEIR at 1-87, 4.16-21.)

Finally, the WSA provides that it will be reviewed every three years until the Project begins construction to ensure that the information in the WSA are accurate and updated. (*WSA at 22.*) Since the WSA was finalized in March 2015, the FEIR must be revised to include an updated WSA based on this statement alone.

Response 23:

The FEIR does not have contradictory statements regarding water availability. The FEIR identifies a potentially significant impact regarding water availability (p. 4.16-15), presents an analysis of water availability including the WSA (FEIR Section 4.16.1.6.1), proposes mitigation to ensure that any potential impact is less than significant (FEIR p. 4.16-20 – 21), and concludes that impacts to water availability are less than significant (FEIR p. 4.16-21).

In their WSA, the EMWD has concluded that the agency has the ability to provide water to the project (FEIR, Appendix M-1).

The commenter is incorrect that use of recycled water systems is not incorporated into the FEIR. Mitigation Measure 4.16.1.6.1A clearly requires, “Use of reclaimed water for irrigation if it becomes available.” Since the FEIR concludes that with the identified mitigation measures there is no significant impact to water availability, no additional mitigation measures are necessary.

The City has requested the EMWD issue a three-year extension on their WSA issued March 2012. There is no indication at this time that their conclusion will change.

Comment 24:

VII. THE FEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE PROJECT IMPACTS REGARDING HYDROLOGY, DRAINAGE, AND WATER QUALITY

The FEIR provides an inadequate impact analysis and defers or proposes unenforceable mitigation measures regarding Project impacts on hydrology, drainage, and water quality. The FEIR concludes that impacts to hydrology, drainage, and water quality will not be significant and do not require mitigation. (FEIR at 1-17.) Yet in the same paragraph and other portions it discusses mitigation measures for these impacts. (Id.; see, e.g., FEIR at 1-20 (concluding that potential impacts to storm water drainage requirements and adequate water supply will be mitigated to a less than significant level).)

The FEIR states that the Project will not require the construction of new storm water drainage facilities or expansion of existing storm water drainage facilities, (FEIR at 4.16-25,) yet provides that five new drainage systems will be constructed to accommodate additional runoff that will result from the Project. (FEIR at 4.16-24.)

Additionally, the FEIR acknowledges that the Project will be required to create a Storm Water Pollution Prevention Plan (“SWPPP”), a Water Quality Management Plan (“WQMP”), and a Water Quality Sampling Program (“WQSP”) to protect the San Jacinto basin developed except for a programmatic WQMP, constituting a deferral of feasible mitigation measures and depriving planning agencies’ and the public their ability to adequately assess the water quality impacts of the Project. (CEQA Guidelines § 15126.4(a)(1)(B) & (a)(2).) The EIR’s attempt to rely upon a programmatic WQMP leads to an improperly vague deferral of specific, enforceable mitigation measures to alleviate water quality impacts. (Federation, supra, 83 Cal. App. 4th at 1262.)

Moreover, the FEIR acknowledges that the Project will introduce a substantial amount of impervious surfaces on the site that could result in significant increases in off-site runoff. (FEIR at 1-87, 4.16-22.) Yet it merely defers any drainage-related mitigation measures to the individual plot planning, which makes it impossible to assess the impacts and cumulative impacts of these measures. (Id.; FEIR at 4.16-25.) Additionally, the FEIR only requires that the drainage plan for each plot design “existing sediment carrying capacity of the drainage courses existing the Project area is similar to the existing condition,” and that the sheet flow after the implementation of the Project is “comparable” to current conditions to minimize erosion. (Id.) However, this mitigation measures fails to actually propose methods to reduce off-site runoff to a less than significant level, e.g. mandating that the average rate, peak flow, and total quantity of runoff after project implementation does not exceed current rates and quantities. Thus, the FEIR’s conclusion that drainage impacts will be less than significant after mitigation is unsubstantiated.

Response 24:

The proposed detention basins will adequately control runoff. As stated in Section 4.9.6.1 on page 4.9-39, paragraph 2 of the FEIR, the detention basins are designed not only as detention basins but as combined infiltration and detention basins. The bottom two feet in depth of the basin is designed as an infiltration basin, i.e., the water will infiltrate in the ground because there is no outlet. Only when the water level rises above two feet will the water flow downstream. Table 4.9.J outlines the basin volumes for both detention and infiltration for each of the 11 basins.

As stated on page 4.9-47 of the FEIR the project’s impacts will be mitigated with the implementation of infiltration basins and bioretention areas. The volume of runoff after the project is constructed will be less than the existing volume of runoff and the amount of infiltration will increase. A hydrologic analysis was performed for the pre and post project conditions based on historical runoff (p. 4.9-39). The basins have been designed to ensure that the runoff matches the pre-project condition. The hydrologic analysis was based on conservative estimates of soil type and infiltration rates and will be updated with site specific information as each project is developed.

The amount of runoff that will flow to the San Jacinto Wildlife Area will mimic pre-project conditions as outlined in Mitigation Measures 4.9.6.1A and 4.9.6.1B.

Comment 25:

CONCLUSION

Thank you for your attention to these comments. We look forward to working with you to assure that the EIR conforms to the requirements of CEQA to assure that all significant impacts to the environment are fully analyzed, mitigated or avoided. Should you have any questions feel free to contact Jonathan Evans at the contact information listed below.

The Center for Biological Diversity and San Bernardino Valley Audubon Society wish to be placed on the mailing list for all future notices regarding this project. Please mail all notices to CBD at the address listed (via email at jevans@biologicaldiversity.org); and San Bernardino Valley Audubon Society at drewf3@verizon.net and P. O. Box 10973, San Bernardino, California 92423-0973.

Response 25:

The City appreciates the comments made on the FEIR by the commenter and has provided responses to these comments. All materials provided will be made part of the public record. The City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

MEMORANDUM

DATE: June 23, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to Letter from the City of Riverside dated June 10, 2015**

In a letter dated June 10, 2015, the City of Riverside submitted comments on the WLC Project FEIR. The City numbered its specific comments using a combination of Roman and Arabic numerals, and the following responses are presented below using the same numbering system as the comment letter. For brevity, the long comments submitted by the City are not duplicated in this memo, but the actual comment letter is attached to the memo for reference.

Response I:

The impacts described in the FEIR are similar to or less than the impacts described in the DEIR. New, though not significant, information added to the document responds to comments; merely clarifies or amplifies existing information; or adds new mitigation measures, any impacts of which have been fully evaluated in the FEIR. None of the changes that Riverside describes in its comment meet the standard requiring recirculation. Changes to the document and the inclusion of new information is not the standard for recirculation, in fact, it is the public process of CEQA.

Response II (A.1):

This comment was fully addressed in response to the City of Riverside's comments on the Draft EIR (FEIR Volume 1, Response to Comment (RTC) E-2A-6). As stated in the FEIR:

The TIA used the Highway Capacity Manual (HCM) methodologies to analyze traffic delay at intersections. This standard methodology is mandated in the traffic impact analysis guidelines for both the City of Moreno Valley and the City of Riverside. The HCM describes LOS "F" as "Intersection oversaturated; arrival rates exceed intersection capacity so queues build up." The methodology does not actually predict delays higher than 50 seconds for unsignalized intersections and 80 seconds for signalized intersections; it simply states the delays would be beyond those thresholds because at that point other things would start to occur such as re-routing and trip suppression. So when the TIA states that delay is ">50 seconds" it is correctly following the HCM procedure as required by both the Cities of Moreno Valley and Riverside. While the computational software will produce a numerical estimate of delay beyond the 80 seconds limits, that number is sometimes meaningless, as the City's comment letter points out (page 6) for the single case where such an irrational number was inadvertently present in the report. However, in response to the comment the upper limit for reported delay for unsignalized intersections was revised from 50 seconds to 180 seconds.

In summary, values greater 50 seconds for unsignalized intersections and 80 sections for signalized intersections are meaningless (per HCM methodologies, which the City of Riverside also uses). As a result, now showing those numbers does not constitute a more severe impact and that the computed, though meaningless results, were shown as a courtesy in response to the City of Riverside's comment. In addition, the developer is required to pay its fair share of the cost of improvements if a fair share program exists for intersections and segments outside of Moreno Valley (MM 4.15.7.4A, D, E, and F).

Response II (A.2):

The City of Riverside requests that an ADT analysis be conducted as part of the FEIR. This comment was also fully addressed in the response to comments on the DEIR (FEIR Volume 1, RTC E-2A-5):

It is the commenter's opinion that by analyzing the ambient peak hour rather than the peak hour for warehouses shown in DEIR Appendix L-1 TIA Figure 28 (now Figure 31 in FEIR Volume 2 Appendix L-1) the TIA is understating the project's impacts. The commenter states off-peak or 24-hour analysis periods should have been used.

It is correct that a large percentage of the project's traffic occurs during off-peak hours. This is a highly desirable feature for a major employer. However the purpose of the traffic analysis is to identify where plus-project traffic levels might necessitate roadway improvements by analyzing and mitigating impacts for the worst-case scenario. The worst-case scenario will occur either in the AM or PM ambient peak period, but not during off-peak hours. If sufficient capacity is provided for the worst-case traffic periods then the capacity will also be sufficient for all other off-peak hours. The TIA followed this established procedure in conformance with official guidance ranging from Transportation Research Board's (TRB) Highway Capacity Manual (Chapter 3) to the City of Riverside's own Traffic Impact Analysis Preparation Guide (pages 5, 12, 20). Because of the conservatively high trip-generation rate used in the WLC analysis, along with the fact that the peak of trip generation was assumed to occur simultaneous with the peak of background traffic, the assumptions in the WLC analysis are far more conservative (i.e. assumes worse case conditions) than the field data in the National Association of Industrial and Office Properties (NAIOP) survey suggests is likely to occur. As can be seen in Exhibit E-2A-1 from the TIA, copied below, the TIA assumed peak-hour trip-generation rates far higher than those found in the highest hours of the NAIOP study cited by the commenter.

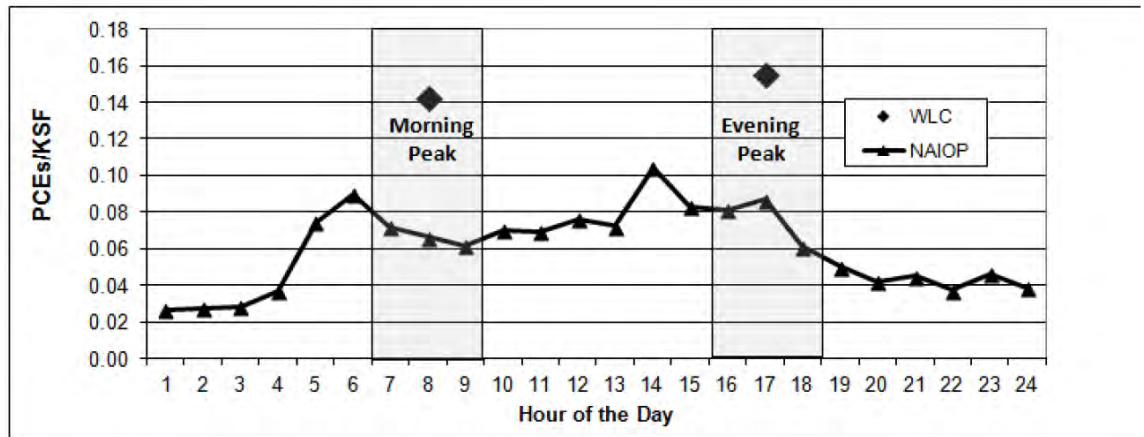


Exhibit E-2A-1: Time-of-Day Distribution, WLC Assumptions Compared to NAIOP

Besides roadway design, which was already addressed in the peak-hour analysis, the other purpose of the traffic forecasts was as an input into air quality analyses. The traffic data used for the air quality analysis covered both the peak periods and the full 24-hour period, as requested by the commenter.

In summary, an ADT analysis will not reveal any impacts beyond those presented in the peak hour analysis contained in the FEIR.

Response II.A.3:

As indicated in RTCs E-2A-4 and E-2A-8, Section 4.15 of the FEIR and Section 2.A of the TIA (Appendix L) provide detailed information on growth assumptions.

Response II.A.4:

As explained in RTC E-2A-9, RivTAM is an iterative model that assigns trips based on the shortest trip length time. As a result, diversion is directly accounted for within the model. However, the City of Riverside may be alluding to those values that are greater than 50 seconds for unsignalized intersections and 80 seconds for signalized intersections, which are meaningless. However, those out-of-range values occur before the application of mitigation, specific roadway improvements to reduce delay. Once mitigation is incorporated, there are no longer out-of-range numbers (those that exceed 50 or 80 seconds). As a result, the final results present delay that takes into account diversion.

The purpose of the figures mentioned in the comments is not to show link-specific detail but to give the reader a sense of the major routes that project traffic will be taking. Detailed link information is contained in Appendix L, where the TIA contains detailed tables and figures showing where project traffic occurs. The amount of traffic data contained in these tables and figures is large and cannot be boiled down to simple graphics, but are available for the reader to examine traffic impacts at a the link/intersection level.

Response II.B:

The FEIR provides a comparative analysis of the alternatives included in the FEIR based upon the difference in the trip generation of the alternatives. Since the uses described in the alternatives rely upon uses detailed in the WLC project or the MHSP, those documents serve as an adequate basis to make comparisons to the various alternatives. CEQA does not require the level of detailed analysis of alternatives as it does for the proposed project. As a result, the alternatives discussion provides the necessary information for an informed decision based upon comparative impacts.

Response II.C.1:

The appendix was properly identified. Appendix L-1 refers to the main body of TIA. Appendix L-2 and subsequent portions include the appendices of the TIA. Collectively, these appendices are referred to Appendix L. That aside, the Appendix clearly identifies the required mitigation, though confusion may have been caused by attempting to refer the commenter to comprehensive discussion on mitigation rather than narrowly identify select tables. The tables that identify specific infrastructure improvements begin with Table 74 and clearly identify which infrastructure improvements are feasible and which are not. Table 74 is copied below with the relevant text highlighted:

Table 74: Project Direct Impacts on Road Sections

Study Roadway	From	To	Jurisdiction	LOS Standard*	Existing LOS	Existing Plus Build-out LOS	Does the Project have a Significant Impact?	Mitigation Measures Required to Reduce Project Impacts to Less-Than-Significant	Is the Mitigation Feasible?	LOS After Feasible Mitigations are Implemented	Impact Significant After Feasible Mitigations are Implemented?	Is There an Existing Deficiency?	Developer Action Required	
(A)			(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	
Road Section Impacts that can be Mitigated to a Less-Than-Significant Level														
S-22	Cactus Ave.	Redlands Blvd	Cactus Ave Extension	Moreno Valley	C	A	E	Yes	Widen to 4 lanes	Yes	A	No	No	Pay fair share (95.9%)
Road Section Impacts that are Considered Significant and Unavoidable (because they are not under the control of the City of Moreno Valley)														
S-16	Gilman Springs Rd	Alessandro Blvd (Street C)	Bridge Street	Riverside County	D	F	F	Yes	Widen to 4 lanes	Yes	C	No	Yes	Pay fair share (12.2%)
S-17	Gilman Springs Rd	SR-60	Alessandro Blvd (Street C)	Riverside County	D	E	F	Yes	Widen to 4 lanes	Yes	C	No	Yes	Pay fair share (17.8%)

* LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways.
 Indicates LOS exceeds the target level

Section 11.G identifies the text of the mitigation measures carried forward to the FEIR incorporating the preceding tables. Traffic mitigation measures are also set in the FEIR Section 4.15.7.74 (p. 4.15-233 – 235) and in the Executive Summary, Table 1.B, pages 1-78 – 82.

Response II.C.2:

The City of Riverside's comments misrepresent what was stated in RTC E-2A-12. The response states (1) Riverside is incorrect in characterizing the project as a port-related project, (2) that the analysis performed is consistent with TUMF guidelines, and (3) these are the TUMF guidelines that Riverside agreed in order to provide regional mitigation. The FEIR does not claim that payment of TUMF reduces impacts into insignificance (Section 4.15.7.5, p. 4.15-237). The response does not indicate that the applicant not pay TUMF fees or that Riverside suggested such.

Response III.A:

The City of Riverside contends that its noise ordinance (RMC 7.25.010) applies to traffic-generated noise. However, the noise ordinance exclusively discusses permitted noise levels from applicable land use categories. The code identifies the following land use categories: residential, office/commercial, industrial, community support, public recreation facility, nonurban. None of these land use categories are roads or highways. As a result, Riverside's noise ordinance is not applicable to traffic-generated noise.

Response III.B:

The City of Riverside claims that their comment sleep disturbance was not fully addressed; that is not the case. All traffic noise will come from existing facilities with existing truck traffic that produce continuous noise. As a result, the use of a single-event metric like the FICAN curve is not relevant. As the commenter points out, "roadway noise would have a significant effects on sensitive receptors under the Community Noise Equivalent Level ("CNEL") metric." The City agrees, which is why all the noise analysis, including highway and road impacts, were conducted using the CNEL metric. All impacts are fully disclosed in the FEIR and, where feasible, mitigation is incorporated. With regard to construction impacts, the FEIR Volume 3, Section 4.12 contains mitigation requirements to reduce nighttime construction noise impacts to less than significant.

Response IV:

Like there is not a gas station at every place of work, it is unnecessary to have an alternative fueling station at every building at the WLC. A centralized alternative fueling station would be the most effective and efficient method of providing alternative fueling. In addition, it would be publically available providing alternative fuel options beyond the needs of the WLC. Implementation is not at the discretion of the developer, the FEIR requires that the fueling station be operational no later than the end of Phase 1, but may be operable sooner. As there are alternative fueling stations throughout the Inland Empire, the absence of such a station at the beginning of the project will not prevent alternative-fueled vehicles from calling at the WLC.

With regard to electrical charging stations, infrastructure described in is required to be approved as part of the plot plan. The mitigation requires a minimum of two operating charging stations to be constructed with the building. In addition to the two charging stations, infrastructure sufficient to support the installation of Level 2 charging stations in the future to meet possible future demand is required at the time of construction. As a result, it would be required to be constructed with the building (Mitigation Measure 4.3.6.4A(g)). As a result, there is no issue with the timing mechanism. For additional information, see FEIR, Volume 1, RTC C-3-7 and C-3-8.

Response V.A:

The issue of bird strikes is addressed in Response to Comment E-2A-20 in FEIR Volume 1, Response to Comments (page 291) as shown below:

Response to Comment E-2A-20. The potential for birds striking buildings is real and would result in an adverse, but less than significant impact with regard to common avian species. There are several project design features incorporated in the general concept of the WLCSP that will reduce the potential for bird strikes. Section 4.1.6.1 of the DEIR spells out building heights for the entire Specific Plan. The highest buildings would be no more than 80 feet tall, with "perimeter" buildings along the west north and south perimeters a maximum of 60 feet tall. These design features are specifically for aesthetic reasons, but also

provide a gradual transition from open space areas and should allow for birds to acclimate to buildings both through the transition from shorter to taller buildings, but also through the gradual construction of facilities over a 15-year period.

Bird strikes associated with sensitive avian species, such as golden eagle and Cooper's hawk, may be a potentially significant impact that requires mitigation. Mitigation for impacts to sensitive avian species that potentially occur within the WLCSP is covered under the MSHCP. MMs 4.4.6.1A-B, 4.4.6.2A-B, 4.4.6.3A-C, and 4.4.6.4A-I will reduce the project related impacts to a level less than significant.

To help substantially reduce any potential for bird strikes related to new warehouse buildings within the WLC project, and to help substantiate less than significant impacts in this regard, the following measure is proposed (as Mitigation Measure 4.4.6.4L) relative to impacts on migratory or nesting birds:

- 4.4.6.4L** Prior to issuance of building permits for any buildings within 1000 feet of the southern or eastern boundaries of the WLCSP, building plans shall indicate that all windows be constructed of “Ornilux” or equivalent glass or coated to minimize potential bird strikes in areas adjacent to the San Jacinto Wildlife Area and the Badlands. This measure shall be implemented to the satisfaction of the City Planning Official.

Response V.B:

The City of Riverside apparently reads “special status birds” to not be inclusive of birds protected under the Migratory Bird Treaty Act. In Section 4.4.1.11 of the FEIR, “special status species” are defined as “plant and animal species or subspecies for which there is concern for population sustainability or that are otherwise considered worthy of consideration for protection by the CDFW, USFWS, local agencies, or special interest groups, such as the California Native Plant Society (CNPS).” Birds protected under the Migratory Bird Treaty Act meet this definition. As a result, there is no basis for the City of Riverside’s interpretation. As a result, there is no exclusion for any bird covered by the MBTA. In fact, MM 4.4.6.4B specifically requires that “If it is determined that project-related grading or construction will affect nesting migratory bird species, no grading or heavy equipment activity shall take place within the limits established in Mitigation Measure 4.4.6.4A until it has been determined by a qualified biologist that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow. This measure shall be implemented to the satisfaction of the City Planning Division.”

Response V.C:

As the FEIR states, there are no standards for assessing the air quality impacts on wildlife species and points to the air quality analysis conducted for humans (FEIR p. 4.4-84). Using the latest methods from OEHHA, there are no impacts that would extend into wildlife areas. That is before considering the fact that the air quality mitigation for the WLC project requires the use of diesel-powered vehicles which meet U.S. EPA 2010 standards which have been found not to cause cancer in a recent study conducted by the Health Effects Institute. Given the lack of a significant impact to humans, there is no basis to conclude there is a significant impact to wildlife.

Response V.D:

RTC E-2A-23 fully explains why boundaries for the biological assessment were selected. The MSCHP was used as the basis for the cumulative analysis since it is far larger than the project area covering all of western Riverside County. As the FEIR states in Section 4.4.1.12, “The MSHCP was conceived, developed, and is being implemented specifically to address the direct, indirect, cumulative, and growth-related effects on covered species resulting from build out of planned land use and infrastructure” (emphasis added). As a result, it serves the purpose of conducting a comprehensive cumulative analysis as determined by the resource agencies.

The City of Riverside claims that the FEIR does not provide evidentiary support that payment of MSCHP fees will serve as cumulative mitigation. This is not correct. Section 4.4.1.12 of the FEIR lays out in detail how the MSCHP was developed, its goals, and how it will be implemented. It is a comprehensive plan by local, state

and federal agencies to address biological impacts. In addition, Section 4.4.7 of the FEIR discusses how application of the MSCHP and payment of fees addresses the cumulative impacts identified in the FEIR.

Response VI:

The FEIR concludes that the construction and operation of the WLC will not have a significant GHG impact, see FEIR Section 4.7.7, p. 4.7-59 – 60. As a result, no further mitigation is required.

Response VII:

The identification of the environmentally superior alternative does not take into account project objectives. The FEIR states in Section 6.5 that “Alternative 1 – Reduced Density —has been deemed to be environmentally superior to the proposed project.” After that determination was made, a comparison of the environmentally superior alternative to the other alternatives, in terms of satisfaction of project objectives is presented, Table 6.5, page 6-45.

**** In addition, the City of Riverside’s letter contained comments by the traffic consulting firm of Linscott Law & Greenspan which are addressed in the following responses ****

Comment 1:

Response E-2B-1. The response to this comment is not correct. Our comment does not assert that all traffic generated by the World Logistics Center will pass through the City of Riverside, since 25,000 vehicles and 12,000 trucks, which is based on Table 24, Figure 25 and Figure 29 (January 2013 TIA) comprises only 52% of the 71,085 total vehicles and trucks generated by the Project. Furthermore, utilizing the revised trip generation provided in Table 25 and the general traffic distribution patterns provided in Figures 39 and 44 (i.e. autos and trucks), it was determined that approximately 24,000 auto trips per day (54,714 vehicles x 44% = approximately 24,000 vehicles) and 11,500 truck trips per day (14,007 trucks x 82% = approximately 11,500 trucks) would travel through the City of Riverside via the freeway and/or arterial network. As a result it continues to be imperative that the traffic impact analysis for the World Logistics Center adequately analyze and provide tangible mitigation measures that will provide corridor-wide benefits for both employees and trucks.

Response 1:

Regardless of how the original comment was construed, the City’s Response to Comment E-2B-1 is still consistent with this updated comment. The comment states that traffic impacts need to be adequately analyzed and tangible mitigation be provided. The TIA and FEIR do this, as outlined in FEIR Section 4.15 and the TIA in FEIR Volume 2 Appendix L.

Comment 2:

Response to Comment E-2B-5. Comment not fully addressed. The TIA should be updated to clearly state which planned improvements are included in the analysis (i.e. intersection location, type of improvement, funding source and timing of improvement) and not direct the reader to SCAG's 2012 RTP for the list of improvements. The list of improvements could be added as an appendix to the TIA for easy reference.

Response 2:

As indicated in the original response to E-2B-2. the RTP is the basis for the improvements included in the analysis. That list is incorporated by reference, with a link provided in the original response identifying where the list can be found: http://rtpscs.scag.ca.gov/Documents/2012/famendment/2012A01RTP_ModelList.pdf

Comment 3:

Response to Comment E-2B-8. Comment not addressed. Although Figure 39 (Autos Distribution) and Figure 44 (Trucks Distribution) are provided in the revised Traffic Impact Analysis Report, more detailed distribution figures should be added to the report consistent with a typical TIA. These figures need to be provided so the project assignment to the key study intersections and/or freeway segments can be verified.

Response 3:

The commenter has not indicated what more detailed project trip distribution information is necessary to accurately estimate potential traffic impacts from the proposed WLC project. The TIA provides sufficient information and graphics to illustrate the trip distribution assumed for project traffic affecting roads and intersections away from the WLC site. Project impacts are determined by assessing the level of service when considering project trips *plus existing (or future) traffic*. It is these figures that are shown in the TIA (FEIR, Appendix L) for every analyzed intersection. No additional information or graphics are needed to complete that assessment.

Comment 4:

Response to Comment E-2B-13. Comment not addressed. The traffic impact analysis does not include a daily roadway segment analysis, which is recommended for this project considering that the AM and PM peak hours only consist of 13.7% of the project's daily traffic generation forecast. Per the City of Riverside Public Works Department Traffic Impact Analysis Preparation Guide, dated December 2014 (Section 6.0- Study Area) and cited by the City in its response, a roadway link analysis shall be required for a TIA analyzing General Plan Amendments (GPA), Specific Plans (SP) or Specific Plan Amendments (SPA). Should the analysis reveal significant traffic impacts, appropriate mitigation measures should be identified, such as contributions to the City of Riverside's Traffic Signal Mitigation Fee program.

Response 4:

The commenter recommends that analyses of the off-peak and daily time periods be performed. The commenter also asserts, without any supporting evidence, that project traffic is likely to divert onto Martin Luther King Blvd. and Van Buren Blvd. and that these be included in the analysis for the daily period. A daily roadway segment analysis is not needed because a large percentage of the project's traffic occurs during off-peak hours. This is a highly desirable feature for a major employer. However the purpose of the traffic analysis is to identify where plus-project traffic levels might necessitate roadway improvements by analyzing and mitigating impacts for the worst-case scenario. The worst-case scenario will occur either in the AM or PM ambient peak period, but not during off-peak hours. If sufficient capacity is provided for the worst case traffic periods then the capacity will also be sufficient for all other off-peak hours. The TIA followed this established procedure in conformance with official guidance ranging from (TRB's) Highway Capacity Manual (Chapter 3) to the City of Riverside's own Traffic Impact Analysis Preparation Guide (pages 5, 12, 20). Because of the conservatively high trip-generation rate used in the WLC analysis, along with the fact that the peak of trip generation was assumed to occur simultaneous with the peak of background traffic, the assumptions in the WLC analysis are far more conservative (i.e. assume worse conditions) than the field data in the National Association of Industrial and Office Properties (NAIOP) survey suggests is likely to occur. As can be seen in Exhibit E-1B-1 from the TIA, copied below, the TIA assumed peak-hour trip-generation rates far higher than those found in the highest hours of the NAIOP study.

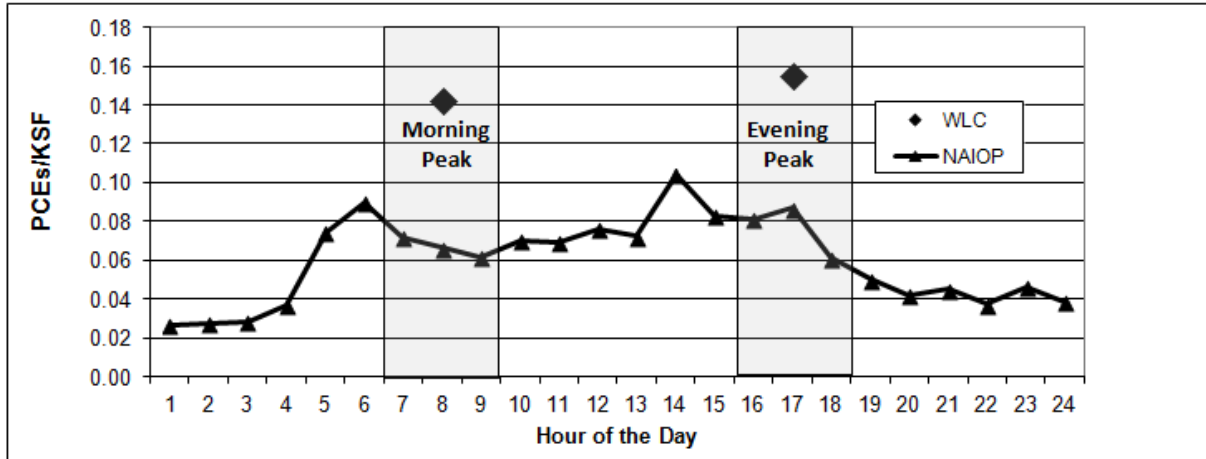


Exhibit E-2B-1: Time-of-Day Distribution, WLC Assumptions Compared to NAIOP

The impact of project traffic on Martin Luther King Blvd. were studied for the five intersections where the project was forecast to potentially add 50 or more peak-hour trips (Study Intersections 81 through 85). No intersections were studied along Van Buren Blvd. because tests using RivTAM forecast project traffic to be less than the threshold for study.

Besides roadway design, which was already addressed in the peak-hour analysis, the other purpose of the traffic forecasts was as an input into air quality analyses. The traffic data used for the air quality analysis covered both the peak periods and the full 24-hour period, as requested by the commenter.

Comment 5:

Response to Comment E-2B-14. Comment not addressed. The response indicates that the threshold for analysis is 100 peak hour trips based on Caltrans guidelines. However, this is not the complete threshold utilized by Caltrans as stated in the current Caltrans Guide for the Preparation of Traffic Impact Studies (Chapter II, Section A - Trip Generation Thresholds). This section of the guidelines illustrates criterion when the analysis of a State highway facility is required. There are three categories of trip thresholds shown in the guidelines (i.e. generates over 100 peak hour trips, generates between 50 and 100 trips and generates between 1 and 49 peak hour trips). Therefore the number of project trips generated on the section of the I-215 Freeway between the SR-60 Freeway and Perris Boulevard should be determined/shown in the TIA report and the appropriate analysis conducted based on Caltrans requirements, which at a minimum would include the existing LOS on this freeway mainline section. This further accentuates the need for a detailed trip distribution pattern, which would show the percentage of traffic on this section of the I-215 Freeway.

Response 5:

First, the City's original response addresses this comment in part and is repeated below:

As discussed in the TIA (Chapter 1, Section B), the City of Moreno Valley approved a minimum threshold of 100 peak-hour trips to be used to determine whether or not a freeway segment needs to be further analyzed. This threshold was based on Caltrans' guidelines. The City of Riverside itself uses thresholds like this in its traffic analyses (see City of Riverside, "Traffic Impact Analysis Preparation Guidelines", page 3).

This portion of I-215 would attract few WLC trips because it is dominated by an alternate route that is 4.6 miles shorter (i.e. the travel distance from SR-60 at Perris Blvd to I-215 at Nuevo Rd is 14.6 miles using the SR-60/I-215 route but only 10.0 miles using Perris Blvd). That section was analyzed to determine if it met the threshold for further analysis. Tests using the RivTAM model showed that fewer than 100 project trips

used this portion of I-215. It therefore did not meet the minimum threshold and therefore it was not included for further analysis. This logic is similar to that presumably used when the City of Riverside recently chose not to require that this same section of I-215 be analyzed in the traffic study for the Gless Ranch shopping center.

Comment E-2B-14 asked how many vehicle trips will use the I-215 in order to calculate the WLC's fair share of the cost of improvements. The TIA also used the thresholds cited above by the commenter when conducting the mainline and weaving analyses for freeway traffic as well. The TIA used the appropriate methodologies to estimate fair share contributions to local as well as regional improvements, including freeways.

Comment 6:

Response to Comment E-2B-15. Comment not fully addressed. The revised TIA should show how many AM and PM peak hour project trips are expected to utilize Cajalco Road, so there is a method to validate that the proposed Project will not exceed the 50-trip threshold required for analysis.

Response 6:

This is not reasonable. One of the reasons to have a threshold for further analysis is that there are thousands of road segments throughout the Inland Empire where traffic would not meet the minimum threshold for further analysis. Presenting the results on all of them would be a meaningless exercise that does not result in describing actual transportation-related impacts.

Comment 7:

Response to Comment E-2B-16. It is reasonable and appropriate to expect that the Project buildout analysis (Year 2022) should include mitigation measures associated with the LOS analyses and identification of significant traffic impacts. While the 2035 analysis may include all reasonably foreseeable future projects, there is no way to understand which mitigation improvements should be installed with completion of the Project unless all mitigation measures identified in the 2035 analysis are expected to be completed by 2022. Furthermore, if there is a 2022 traffic impact, then the appropriate fair share value towards the mitigation measures should be based on the 2022 condition, not the 2035 condition and therefore identification of the specific mitigation measure in the Project buildout condition is imperative. Otherwise, the fair share contribution will be understated, since the 2035 fair share value is almost always less than the near-term fair share value.

Response 7:

Table 4.15.BA calls for the addition of one mixed flow lane for each segment of the SR-60 with the WLC required to pay the specified fair share. The situation described by the comment is addressed through the transportation mitigation measures. The mitigation measures require an updated transportation analysis with every plot plan. Any impacts must be mitigated as a condition of approval for future development. In addition, the mitigation measures require the payment of fair share contribution to impacts for mitigation outside the jurisdiction as they are identified outside the City. See MM 4.15.7.4A through 4.15.7.4G.

Comment 8:

Response to Comment E-2B-20. The response to this comment is not correct. Based on Table 24 and Figure 29 (January 2013 TIA) the project generates approximately 12,000 truck trips (not PCE trips) to the I-215/SR-60 Freeway through the City of Riverside. Utilizing the revised trip generation provided in Table 25 and the general truck traffic distribution pattern provided in Figure 44, the project generates approximately 11,500 trucks (28,914 PCE trips) to the I-215/SR-60 Freeway through the City of Riverside. As stated before, fundamentally, the addition of approximately 11,500 truck trips (28,914 PCE trips) per day to the I-215/SR-60 Freeway through the City of Riverside necessitates the addition of a corridor wide lane improvement to mitigate the impact on auto traffic similar to the traffic conditions on the I-710 Freeway in South Los Angeles County.

Response 8:

The TIA has correctly analyzed the impact of project traffic on the freeway system, identified the necessary improvements, and recommended that the City work with Caltrans to implement the identified improvement measures, see FEIR, Section 4.15, Table 4.15.BA.

Comment 9:

Response to Comment E-2B-23. Comment not addressed. The City cites to the Caltrans Route Concept Report Study for the SR-60/I-215 Corridor, dated September 2012, in support of its assertion that currently recommended freeway improvements are sufficient and no additional study is warranted. However, unless the 2012 Caltrans Report included traffic associated with the World Logistics Center Project, the assertion that the recommended freeway improvements to SR-60 are sufficient and no additional study is warranted is false.

Response 9:

It is unclear as to what the commenter is trying to say. With regard to WLC traffic on the SR-60/I-215 Corridor, the FEIR fully analyzes the impacts and identifies the needed mitigation (FEIR Volume 2, Appendix L - TIA). With regard to the original comment about studying the addition of a “mixed-flow lane and/or special truck lane”, the Route Concept Report for the SR-60/I-215, September 2012, did exactly that. The feasibility of adding an additional lane is independent of any specific project’s trip generation.

MEMORANDUM

DATE: June 10, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to Letter from Duncan Bush dated June 6, 2015**

In a letter dated June 6, 2015, Duncan Bush submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

Comment 1:

Having received and reviewed the above mentioned report I was amazed to find out that the already significant proposed impacts to my property were increased by 25%. The purpose of an environmental report is to attempt to minimize the project impacts to adjoining properties, no to increase the impacts. I am speaking specifically about the building height limitations being increased along Gilman Springs Road from a "Draft EIR" height of 60 feet to 80 feet high in the Final Programmatic EIR, (Aesthetics, Section 4.1-63 middle of last paragraph). This change will block the already proposed impacted views from my house on Gilman Springs Road and those of the other homes in the Moreno Knolls Homeowners Association.

Response 1:

The Final EIR does correct a typographic error in the Draft EIR that cited 60 feet along the eastern boundary, but the Specific Plan and DEIR Figure 3-9 have always showed building heights along the eastern portion of the project to be 80 feet. See also Response 2 below for more information which describes a 250-foot wide buffer which was added along the west side of Gilman Springs Road to help address this issue.

Comment 2:

Just because the properties are outside of the limits of Moreno Valley does not give the City or developer the right to ignore our rights or the impacts to our properties with no attempts at mitigation. The City ignoring the rights of those outside of the City but not treating them equally to those properties within the city limits is a clear violation of EPA's Environmental Justice, "EPA's goal is to provide an environment where all people enjoy the same degree of protection from environmental and health hazard and equal access to the decision-making process to maintain a healthy environment in which to live, learn, and work." This is only location where the perimeter heights above 60 feet. Even the adjoining San Jacinto Wildlife Area has limits of 60 foot building heights plus a 400 foot landscaped setback. I would like to have the same consideration as the other species adjoining this proposed project.

Response 2:

Figure 3-9 in the Draft EIR clearly shows a building height limit of 80 feet along the eastern boundary of the project, so it is consistent with the current FEIR documentation (Figure 3-9 in the Revised DEIR). The City's CEQA procedures are based on the City's responsibilities as a lead agency under CEQA, a state law, while the EPA's EJ goal is guidance for federal agencies under the National Environmental Policy Act which applies to federal actions, so there no violation of any federal law or regulation involved. While the land and people within the City's boundaries are its primary responsibility, certainly the City wishes to protect environmental resources and minimize impacts on people outside of or adjacent to the City to the degree it can effectively. The commenter should be aware that splays of the San Jacinto Fault run along the west side of Gilman Springs Road within the WLC property, and the actual location of buildings west of GSR will ultimately depend on future

fault location studies when specific development is proposed along the west side of GSR (Planning Areas 7, 8, 9, and 12). These physical constraints will doubtlessly affect future building locations and setbacks.

In addition, page 4.1-65 of the DEIR states the following:

Views from the East. Permanent views from existing residences east of Gilman Springs Road will fundamentally change. The views they now have of the agricultural fields on the project site will eventually be replaced by a view of an urbanized area consisting of warehouse buildings, parking areas, streets, and ornamental landscaping. The proposed buildings will not block views of the Mount Russell Range to the southwest but may block or partially block views of the Mystic Lake area.

Transient/Motorist Views along Gilman Springs Road. Transient views for travelers on Gilman Springs Road will fundamentally change over time, as future buildings within the WLCSP will be visible to travelers in both directions, replacing existing views of agricultural fields. Eventually buildings within the Specific Plan may block or partially block views of the lower slopes of the Mount Russell Range, as well as distant views of Mystic Lake for southbound drivers. This is a potentially significant impact requiring mitigation.

Based on that analysis, the following mitigation measures were proposed which include views along the eastern boundary of the project (i.e., just west of and adjacent to Gilman Springs Road):

- 4.1.6.1A** Each Plot Plan application for development along the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing or planned residential zoned uses) shall include a minimum 250-foot setback measured from the City/County zoning boundary line and any building or truck parking/access area within the project. The setback area shall include landscaping, berms, and walls to provide visual screening between the new development and existing residential areas upon maturity of the landscaping materials. The existing olive trees along Redlands Blvd. shall remain in place as long as practical to help screen views of the project site. This measure shall be implemented to the satisfaction of the Planning Official.
- 4.1.6.1C** Prior to the issuance of a certificate of occupancy for buildings adjacent to the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing residences at the time of application) the screening required in Mitigation Measure 4.1.6.1A shall be installed in substantial conformance with the approved plans to the satisfaction of the Planning Official.

Even with implementation of these measures, the EIR concludes both project and cumulative visual impacts of the WLC project will be significant, and requires adoption of a Statement of Overriding Considerations under CEQA.

Comment 3:

My house (14670 Gilman Springs Road) is closer to the proposed project than any other property on Gilman Springs Road yet no noise impact study was performed on that location for this project.

Response 3:

Ambient noise monitoring for the project noise study was conducted at Site 2 (shown in DEIR Figure 4.12.2) which is relatively close to the commenter's residence. Section 4.12.6.2, Long-Term Noise Impacts, evaluates noise impacts of the WLC project, including along Gilman Springs Road. Page 4.12-53 of the DEIR noise analysis specifically states the following relative to noise along the east side of Gilman Springs Road near the commenter's residence:

Gilman Springs Road (between Eucalyptus Avenue and Street C, and between Jack Rabbit Trail and Bridge Street). There are three single-family homes scattered along these roadway segments. All of the houses are set back from the roadway, but none has soundwalls. A significant noise increase is projected for at least one of these segments in three of the four case years. Homes that are widely separated from other homes cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.

The EIR acknowledges these impacts, recommends feasible mitigation, and some noise impacts are still significant. This will require adoption of a Statement of Overriding Considerations under CEQA.

Comment 4:

I also wrote two letters, one on March 13, 2012 and another on April 5, 2013. Only the first letter appears in the report and the responses to both letters were non-existent or sketchy at the best; not addressing the issues.

Response 4:

The commenter's March 13, 2012 letter actually commented on the Notice of Preparation issued for the WLC EIR in 2012, and that letter was acknowledged in Table 2.A , *NOP Comments Received*, in the Draft EIR. The issues raised by the commenter were addressed in appropriate sections of the DEIR (e.g., aesthetics, noise). The April 5, 2013 letter commenting on the Draft EIR was included in the Final EIR as Letter G-55 in FEIR Volume 1 - Response to Comments, on pages 1309-10 and the commenter's ten comments were each addressed in that section.

Comment 5:

This is also a significant impact to the designated "Scenic" Gilman Springs Road and increases this impact. The WIR writers are aware that this is the case, yet there is also no mention of increased impacts to the adjoining Moreno Knolls neighbors are mentioned, (like we don't exist).

Response 5:

CEQA involves the evaluation of impacts to public views, not private views, so impacts to views from individual residences are outside of the scope of the CEQA document. However, impacts to public views along Gilman Springs Road are addressed in Section 4.1.6 of the DEIR. Page 4.1-65 specifically states:

Impact Summary: Scenic Vistas. *The implementation of the proposed project will obstruct and/or substantially affect scenic views for residents living within, or in the vicinity of, the project, and for travelers on SR-60, Gilman Springs Road, Redlands Boulevard, Theodore Street, and Alessandro Boulevard. Many of the views of the motoring public while on local roadways will fundamentally change; instead of views of open agricultural land, these residents and motorists will view new logistics buildings and the associated parking areas, roadways, infrastructure, and landscaping. Therefore, the project will have a significant visual impact. The degree to which these buildings may block views of major scenic resources (i.e., Mount Russell, the Badlands, and Mystic Lake) will depend on the location and heights of buildings.[emphasis added)*

Information on mitigation relative to view impacts along the east side of the project are outlined in Response 2.

Comment 6:

The project is in the wrong location and has significant cumulative failures in so many areas that I am unable to adequately respond to them all. Placing a project of this size with the truck traffic that comes with it should have been located along an Interstate Highway not a State Highway. Federal funding for such things as freeway widening, interchanges, and maintenance, flow easier to the Interstate System than the State Highway System.

Response 6:

The Final EIR and subsequent correspondence can only respond to specific comments made on the Final EIR documents. DEIR Section 4.15, *Traffic and Circulation*, evaluated the impacts of the proposed WLC project on local and regional streets, as well as the surrounding freeway system (i.e., SR-60 and I-215). While improvements have been made and are planned for both freeways, these improvements will not reduce levels of service during peak hours to within local or Caltrans standards, now or in the future, either with or without the proposed WLC project. This is why traffic impacts of the WLC project were identified in the DEIR as significant and unavoidable as potential mitigation was outside the control of the City (i.e., the lead agency).

Comment 7:

More than 70 percent of the commuters from Moreno Valley use Route 60 not the I-215. Why do we want this here and not East of I-215 as outlined in the existing General Plan?

Response 7:

The industrial area in the southwestern portion of the City, adjacent to the I-215 Freeway, is largely built out and would not support a project the size of the WLCSP. Landowners may propose changes to established General Plan land use designations if they can demonstrate the proposed change meets the overall intent of the General Plan and is generally consistent with its goals, policies, and objectives. DEIR Section 4.10, *Land Use and Planning*, determined the WLC project's was largely consistent with applicable land use policies. In addition, other sections of the DEIR evaluate various goals and objectives of the General Plan as they pertain to various environmental issues addressed in the EIR and as they relate to the proposed WLC project and the WLC project site. It is up to the City's decision-makers if the benefits of the project outweigh its significant environmental impacts. If so, they must adopt a Statement of Overriding Considerations to document that decision.

In addition, the traffic study for the WLC project indicates that new jobs created within the WLC would help incrementally reduce the commute distances and direction of traffic on the SR-60 freeway as the WLC project builds out. This is due to the City's historically low jobs/housing ratio which the WLC project would improve as new jobs were added in the City relative to the amount of housing.

MEMORANDUM

DATE: June 23, 2015

TO: Mark Gross, Planning Department

FROM: Kent Norton, LSA Associates, Inc.

SUBJECT: **Response to Earthjustice Letter dated June 11, 2015**

In a letter dated June 11, 2015, the conservation group Earthjustice submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

Comment 1:

THE FEIR MUST BE RECIRCULATED BEFORE PROJECT APPROVAL AND CERTIFICATION. Under CEQA, an EIR must be re-circulated for review and comment whenever significant new information becomes known to the lead agency and is added to the EIR after public notice of the availability of the draft document has been made, and before the EIR is certified. Pub. Res. Code § 21092.1. Under such circumstances the lead agency is specifically required to re-notice the environmental review document to the public and all responsible agencies, and is required to obtain comments from the same, before certifying the document's impacts and alternatives analyses as well as any mitigation measures. See id.; see also, Pub. Res. Code § 21153. A lead agency's decision not to recirculate an EIR must be supported by substantial evidence. Cal. Code Regs. tit. 14 ("CEQA Guidelines" or "Guidelines") § 15088.5(e).

"Significant new information" includes any information regarding changes in the environmental setting of the project under review. Guidelines § 15088.5(a). It also includes information or data that has been added to the EIR and is considered "significant" because it deviates from that which was presented in the draft document, depriving the public from a meaningful opportunity to comment upon a significant environmental effect of the project, or a feasible way to mitigate or avoid such an effect at the time of circulation of the draft. Id. Some examples of significant new information provided in the CEQA Guidelines are: "(1) information relating to a new significant environmental impact that would result from the project or a new mitigation measure; (2) a substantial increase in the severity of an environmental impact [that] would result unless mitigation measures are adopted; and (3) any feasible alternative or mitigation measure considerably different from others previously analyzed ..." Guidelines § 15088.5 (a)(1)-(3). Recirculation is further required where the draft EIR is "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." Guidelines § 15088.5 (a).

The required re-noticing and new comment period for a re-circulated EIR is essential to meeting CEQA's procedural and substantive environmental review requirements, as the EIR's assessment of a project's impacts, mitigation measures and alternatives and the public's opportunity to weigh in on the same is at the heart of CEQA. Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th 1112, 1123. Where new information is added to an EIR in such a way as to highlight informational deficiencies in the draft document's environmental impacts, mitigation and alternatives analyses, the public must be allowed the opportunity and additional time to comment on the changes made in the final document's analyses. Moreover, where significant new information that is added to the EIR's assessment of a particular impact area falls within

the purview of another responsible agency's area of expertise that agency must also be allowed a meaningful opportunity to review and respond to such new information and any changes implicated in the EIR's analyses.

While re-circulation is indeed an exception and not the rule in the preparation of final environmental review documents, it is an exception that must be invoked here – where the absence of significant information rendered the draft EIR ineffective in meeting CEQA's substantive mandates, and now, where included, the addition of significant new information substantially changes the FEIR's analyses and conclusions regarding the Project's impacts, feasible alternatives and required mitigation. Laurel Heights Improvement Assn. v. Regents of Univ. of Cal. (1993) 6 Cal.4th 1112, 1132. As stated in numerous comments to the draft EIR, that document failed to provide critical information regarding the project area and scope of the project's impacts; it failed to adequately describe fundamental information relating to the phasing and timing of the project's massive structural and infrastructural developments; it lacked adequate detail specifically regarding the construction and operations phases of the project; and it contained analyses and mitigation measures relating to the Project's air quality, traffic, human health and biological resources impacts based on outdated or inapplicable studies and data. In some instances the FEIR erratically and arbitrarily includes selective new data into its analysis of the Project's impacts and mitigation measures, and in others critical information remains absent from the document. Whether referenced in the FEIR as new information, or wholly omitted from the document's analyses, the addition of such information is essential to the public's ability to participate in the environmental review process. The FEIR must therefore be re-drafted and re-circulated document to provide the public at large and the Project's numerous other responsible agencies with more time to review and analyze the Project's impacts and to assess or prescribe necessary mitigation measure to minimize those impacts. The City cannot render a determination on the issuance of the project approvals under consideration until such recirculation occurs, and CEQA compliance is assured.

Response 1:

The comment above describes requirements of CEQA in regard to response to comments and recirculation. The FEIR for the WLC project meets the requirements of CEQA in regard to response to comments. In addition, the FEIR does not meet any of the criteria for recirculation: (1) there are no new or more severe environmental impacts, (2) there are no feasible project alternatives that would lessen the environmental impacts and all feasible mitigation has been adopted, and (3) it is neither inadequate nor conclusory.

In addition, the comment contends that the EIR did not have sufficient detail to address environmental concerns raised by commenters. Throughout the FEIR, detailed analyses are presented regarding the environmental impacts of the project. The project, the WLC Specific Plan, is a land use change. As such, the FEIR is a programmatic document that evaluates the environmental impacts based upon the foreseeable impacts of that land use change. Due to the level of information currently available about the WLC project, a programmatic EIR is the most appropriate CEQA compliance document at this time. The EIR clearly states that more detailed CEQA analysis will be performed once more specific project-level data and plans are submitted to the City for review (future site plans, plot plans, etc.) consistent with the programmatic WLC Specific Plan (FEIR Section 3.7.2 – City of Moreno Valley – Future Approvals, p. 3-114). The project under consideration is a specific plan that serves as planning document, no project-specific information is currently known. At this time, no plot plans are being considered, future tenants are not known, and building sizes for future tenants have not been established. In short, the necessary information for a project-level document will be known when the first plot plan is proposed.

Comment 2:

The FEIR Is Inadequate as an Informational Document, Is Conclusory in Nature, and Precludes Meaningful Public Review. The approval actions before the City involve more than a straightforward project and EIR approval. The City Planning Department and the City Council are not only determining whether to certify the FEIR and approve a single project; rather, in approving the FEIR as currently drafted and the Project as set forth in that document, the City will be approving numerous future actions needed to effectuate the Project's purpose. Indeed, the FEIR refers to the Project as including "all related development and planning activities currently proposed by Highland Fairview in the Rancho Belago area of the eastern end of the City of Moreno Valley." FEIR, at 3-1. Just some of these related development activities include: (1) amendments to the City of Moreno Valley's General Plan; (2) adoption of a new Specific Plan for the area in which the WLC will be cited (and which is the principle subject of the EIR documents); (3) zoning and land use changes including pre-annexation zoning changes for land that has not yet been acquired by the project proponent, Highland Fairview, but that is contained within the project area; (4) execution of a development agreement consistent with the construction of the nation's largest logistics warehouse, and the Specific Plan land use designations; and (5) a tentative parcel map to be governed by both the Specific Plan and the executed development agreement. Despite the numerous actions needed to effectuate the project, the FEIR omits critical information needed to adequately analyze and mitigate the impacts of those actions and as a result, must be recirculated.

Response 2:

The commenter does not specify what "critical information" has been omitted. However, the EIR clearly states that more detailed CEQA analysis will be performed once more specific project-level data and plans are submitted to the City for review (future site plans, plot plans, etc.) consistent with the programmatic WLC Specific Plan (FEIR Section 3.7.2 – City of Moreno Valley – Future Approvals, p. 3-114). The project under consideration is a specific plan that serves as planning document, no project-specific information is currently known. At this time, no plot plans are being considered, future tenants are not known, and building sizes for future tenants have not been established.

Comment 3:

The FEIR's Impacts and Mitigation Analyses are Based on an Improper Project Description and Inadequate Information Regarding Key Project Components...

"[A]n accurate, stable and finite project description is the sine qua non" of a legally sufficient EIR, and "the defined project and not some different project must be the EIR's bona fide subject." County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 199.

Commenters on the DEIR pointed out key deficiencies in the document's failure to adequately describe the scope of the Project, including all of the entitlements necessary to effectuate its purpose and to obtain approval for the land use changes contemplated in the EIR documents. While the FEIR includes a brief response to such comments it dismisses them by stating only that the "WLC EIR does have a complete project description" on account of the project being described in a total of "78 pages with 4 tables." FEIR Response to Comments, at 23. Despite its lengthy description, however, the FEIR still fails to include an adequate description of the full scope of the project and it states inaccurate details regarding key project components such as the project's size and the nature of its immediate surroundings. The result of such omissions and inaccuracies is that the full range of impacts that would result from the City's approval of the multiple actions involved in the Project and purportedly analyzed in the FEIR, remain undisclosed, and the public as well as the Project's numerous responsible agencies are precluded from providing meaningful input regarding the Project's impacts and necessary mitigation measures.

Response 3:

The commenter does not indicate what part or parts of the project description are missing. The FEIR contains a detailed project description including the size of the project, described in acres of development as well as square feet of buildings. The project under consideration is the WLC Specific Plan. Being a programmatic document, the FEIR examines the impacts of the adoption of the WLC Specific Plan and outlines how future environmental review will guide the subsequent development under the specific plan as described above in response to the first comment.

Comment 4:

For example, the FIER only generally refers to the General Plan amendments that will be needed to effectuate the Project's purpose. FEIR, at 3.12-19. Despite their brief reference throughout the FEIR these amendments will have significant and long lasting impacts. The General Plan, as approved in 2006 and in its "community development" provisions designates the Project area as one that should be developed with the goals of supporting an "organized" "pattern of land uses" that promotes the "rational utilization" of the area's land parcels and creates a "functional balance between urban and rural land uses that will meet the needs of a diverse population and promote the optimum degree of health, safety, well-being and beauty for all areas of the community while maintaining a sound economic base" characterized by a "mix of industrial uses." FEIR, at 4.10-10 (citing objectives from the City of Moreno Valley General Plan, 2006, Section 9.2).

Response 4:

The goal of the General plan to promote a "mix of industrial uses" applies city-wide, not to any single project. The WLC Specific Plan accomplishes those goals by bringing the needed industrial space to the City. Other areas have industrial zoning suitable to other types of industrial uses; however, no other portions of the City have the type of large-scale logistics envisioned by the WLC Specific Plan. By bringing this use to the eastern portion of the City where almost no industrial uses exist, the project achieves the General Plan's goal.

By creating a master plan, through the WLC Specific Plan, the project is creating an "organized" "pattern of land uses" that brings needed jobs to the City while reducing the environmental impacts. Through the specific plan, haphazard development will be avoided and development can proceed in an organized manner. It should also be noted that the WLC plan responds to the City's Economic Action Plan adopted by the city council in April 2013 which calls for improving the job to housing ratio in Moreno Valley.

The project will provide 40.6 million square feet of logistics-related warehousing and supporting office space. This development will enhance the economic base and provide increased employment opportunities for the citizens of Moreno Valley in a limited number of worker categories. The project site has direct access to two interchanges on SR-60, along with arterial access to the balance of Moreno Valley, and access to the San Jacinto/Hemet Valley via Gilman Springs Road. It is therefore consistent with the General Plan.

Comment 5:

The Project's goal of constructing and operating a 40.6 million square foot warehouse and committing a total of 2,610 acres to indefinite future use for logistics development directly conflicts with the General Plan's objectives for community development. The size of the warehouse development alone precludes any form of "mixed use" of the Project area, whether that be mixed use to attain a "functional balance between urban and rural land uses" or simply a "mix of industrial uses." The Project's commitment of virtually the whole of the Specific Plan area to some form of logistics development further undermines the General Plan's objectives to create any form of a "pattern of land uses" to "meet the needs of a diverse population" or promote health, well-being and beauty for all areas included in the General Plan. Despite these direct conflicts, however, the

FEIR concludes that the Project “is consistent with the goals, objectives and policies of the City of Moreno Valley General Plan” without reconciling the Project’s clear conflicts with the goals and objectives listed above. FEIR, at 4.10-27. Moreover, the FEIR fails to actually specify what particular General Plan amendments are actually needed to effectuate the Project, and therefore, fails to adequately describe key Project components.

Response 5:

As described in response to the previous comment, the goal of achieving a mix of industrial uses is city-wide. The WLC Specific Plan brings to the City high-cube logistics development to a portion of the City where there are virtually no industrial uses. In addition, the project brings a “functional balance between urban and rural land uses” through the use of special edge treatments areas of the Specific Plan (FEIR, Appendix H, Section 2.5). As described in the Specific Plan and throughout the FEIR (Aesthetics, Section 4.1 and Biology, Section 4.4), the special edge treatments set-off the WLC development from surrounding land uses, reducing environmental impacts. Finally, Section 3.5 of the FEIR lists the specific amendments to the General Plan required by the project, including the specific text additions and deletions and updated figures.

Comment 6:

As explained below, the project area is also inconsistently defined. The FEIR includes misleading and inaccurate references to a “CDFW Conservation Buffer Area” that is not part of the Project. To the extent this “buffer” is used to minimize or otherwise mitigate the Project’s impacts, the reference to the parcel as a “buffer” is fatally flawed and misleads the public.

The FEIR further fails to incorporate any detailed reference to other approvals needed to effectuate the Project, such as the development agreement. Without information relating to the approvals that are specifically designated as necessary for the Project, and which are before the City for a determination on whether they will be issued, the FEIR fails as an informational document. See Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th 1112.

Response 6:

See response to detailed comments below.

Comment 7:

The FEIR defines the Project and the Specific Plan area as including “all related development and planning activities currently proposed by Highland Fairview in the Rancho Belago area of the eastern end of the City of Moreno Valley.” FEIR, 3-1. The subject property is generally located south of SR-60, east of Redlands Boulevard, west of Gilman Springs Road, and north of Mystic Lake and the San Jacinto Wildlife Area. Id. The FEIR defines “Project Site” or “Project Area” as 3, 714 acre-area covered by the project. Id. The same Project area was as a 3,918-acre area in the draft EIR. Id.

Response 7:

The difference in acreage arises from two changes in the FEIR. First, in response to comments, 100 acres has been removed from the WLC Specific Plan area reducing the project size from 41.6 million square feet to 40.6 million square feet, as clearly described at FEIR, 3-1: “In response to comments received on the public review of the DEIR, the Specific Plan was revised to change the Specific Plan boundary resulting in a loss of 100 acres and 1 million square feet of potential development.” Second, the difference of 104 acres is the amount of off-site improvements, which is listed separately in the from the project area, as clearly described at FEIR, 3-1:

“Additional acreage that was evaluated in the EIR but that is not in the Project Area is the Off-site Improvement Area of 104 acres.”

Comment 8:

The Project description contained in the FEIR also refers to a “buffer zone” that is comprised of “CDFW parcels” or the “CDFW Conservation Buffer Area” – a series of parcels that have been integrated into the project area by removing over 1000 acres of land acquired by the State and governed by the Western Riverside County Multiple Species Habitat Conservation Plan (“MSHCP”), for the purpose of habitat and species conservation. FEIR, at 3.19-25. This zone is inconsistently and incoherently described in the FEIR, precluding any accurate assessment of the project’s impacts and mitigation. It is described throughout the Project description as a zone that will be “included in the General Plan amendments” approved as part of the Project and only loosely discussed throughout the document, but elsewhere, the same area is described as falling outside of the Specific Plan area altogether. WLC FEIR, at 3-19; FEIR, at 3-25. Because this parcel was acquired for the specific purpose of preserving additional habitats and species endemic to the San Jacinto Wildlife Area (“SJWA”) the City cannot rely on it as any form of “buffer” from the Project’s impacts.

The use of a parcel of land whose designated purpose has been to “preserve” species habitat is misleading and requires some level of environmental review itself. The FEIR, however, precludes such review. Accordingly, the FEIR must be recirculated for an adequate assessment of the species and biological resources impacts to the habitats surrounding the Project area, including what is referred to throughout the FEIR as the “CDFW parcels” or “CDFW Conservation Buffer” zone. As explained in detail in the comments submitted by the Center for Biological Diversity and the San Bernardino Audubon Society, the “CDFW parcels” also contain critical waste water basins upon which the sensitive riparian resources preservation efforts engaged in by the State are based. The extent to which the State’s preservation goals are interfered with must also be analyzed.

Response 8:

The “CDFW Conservation Buffer Area” that was purchased by the State Conservation Board is clearly described on p. 3-23 of the FEIR. The CDFW Conservation Buffer Area is part of the land-use changes analyzed by the FEIR. Currently, the 910 acres is part of the Moreno Highlands Specific Plan. The Moreno Highlands Specific Plan also includes zoning for the area proposed for the WLC Specific Plan. In proposing to adopt the WLC Specific Plan, the City is also proposing to rezone the portion of the Moreno Highlands Specific Plan that covers the CDFW Conservation Buffer to Open Space, removing the residential zoning. Section 4.4 of the FEIR analyzes the impacts of the proposed project, including to the CDFW Conservation Buffer Area and to the SJWA as well.

The “CDFW Conservation Buffer Area” name refers to the fact that it is owned by the State and that the State purchased the property to incorporate into the SJWA and buffer the SJWA from development to the north: “The DFG has identified the subject properties as being within a Significant Natural Area and has recommended the purchase of the property as an addition to the existing WLA. The acquisition of the subject properties are important to the wildlife area as they will serve as a buffer from development north of the WLA and adds significant wildlife benefits to the WLA.” [emphasis added, citation from Wildlife Conservation Board Meeting Meetings, May 18, 2001, page 56].

It is unclear to what waste water basins the commenter is referring. No waste water basins are being located in CDFW property as a result of the WLC project.

Comment 9:

(6/25/15)

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The draft EIR referred to “CDFW parcels” as being owned by the California Department of Fish and Wildlife, or the “CDFW,” and the FEIR refers to the parcels as being owned and operated by the State Parks Department. FEIR, at 3.11. If the parcels are in fact owned and controlled by the State Parks Department and there is no agreement between the City and Highland Fairview and that Department for use of the area as a “buffer” for the Project, the area may not be subject to the control of either the City or Highland Fairview. Similarly, for the reasons explained above, if the area is owned and operated by the CDFW it should be considered part of the surrounding habitats that will be impacted by the Project, on account of the purpose to maintain that area to preserve special status, sensitive species and habitat diversity.

Without re-circulation commenters and City alike are precluded from obtaining accurate information regarding the ownership and operation of these parcels, and are unable to comment specifically on the FEIR’s claim that this area, which it asserts falls within the Project boundaries, will actually minimize or mitigate the project’s significant impacts. Other public agencies are similarly precluded from providing comments regarding the true role or purpose of the “CDFW parcels” and the City cannot prescribe adequate mitigation based on an accurate assessment of the Project’s real impacts on the surrounding area, and cannot offset its potentially devastating consequences on the surrounding species and habitats.

Response 9:

The CDFW Buffer Conservation Area is owned by the State of California and its description as a buffer is based upon the purpose of the State’s purchase as described in the response to the previous comment. The property falls within the project boundaries because it is subject to a change in zoning under the Moreno Highlands Specific Plan to Open Space as described on p. 3-23 of the FEIR. The project does not rely on these parcels as mitigation and analyzes project impacts to the these parcels in Section 4.4 of the FEIR.

Comment 10:

Unconventionally, the FEIR changed one of its project objectives between the DEIR and the FEIR. The FEIR added the bolded language in the following objective: “Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach.” FEIR, at 3-116 (emphasis added). The FEIR seeks to downplay this change by using the following caveat: “[t]he indicated minor wording change was made so the objectives would more accurate regarding service to the port which will only represent a small fraction of project trips...” Id. (emphasis in original).

While the change may be minor in the overall number of words added to this specific objective, this change drastically impacts the analysis in the FEIR. Project Objectives are meant to guide the entire environmental analysis under CEQA, including the development of alternatives. See Guidelines § 15124(b). Allowing the Project Objectives to change between the DEIR and FEIR has serious consequences because the public is not be able to propose alternatives that meet project objectives if they are changed at the last moment in the process.

The materiality of this change in the instant EIR is demonstrated by examining how this objective was used to justify excluding certain alternatives. For example, the FEIR fails to explain why the 28 million square feet of warehouse space considered under Alternative 1 couldn’t be used to accommodate, to a lesser degree, the 786 daily truck trips coming from the Ports of Los Angeles. See FEIR, at 1-98; see also FEIR, at 4.15-199 (articulating that the trucks coming from the Ports will be between 240 daily trips in 2012 and 786 daily trips by 2035). A 30% reduction in size of the facility could accommodate this paltry number of trucks assumed to come from the Ports of Los Angeles and Long Beach to the same degree that the much larger Project could accommodate the same. In addition to tainting the alternatives analysis, the change in Project Objectives

invokes additional questions that infect the entire assessment of impacts. If this Project is designed to only accommodate “a portion of” the increased needs at the Ports of Los Angeles and Long Beach, what other demand justifies building the nation’s largest warehouse development? Is it Ontario Airport? Is it other warehouses in the region? These questions are left unanswered in the FEIR. Regardless, for the first time, the public and decision-makers are notified that this project is only being justified to accommodate “a portion of” the growth at the Ports of Los Angeles and Long Beach.

Overall, the FEIR’s inclusion of changes to the Project Objectives, for the purpose of justifying its traffic assumptions violates a core value of CEQA in assessing the range of feasible alternatives that could be used to meet the Project’s core objectives.

Response 10:

This is not a major change in the project objective. It became clear through the comments received that readers assumed that the sole purpose of logistics in Southern California is to support activity through the local ports. This is an incorrect assumption. The project objective was revised to reflect that reality and provide clarity to the reader. In addition, the TIA and FEIR were revised to describe the amount of traffic expected from the Ports as mentioned in the comment above (Section 4.15.6.5). Finally, accommodating Port traffic is not the only objective of the project. As explained in the FEIR and TIA, the vast majority of logistics activity in the region is not port-related. FEIR Table 6.T (page 6-46) concludes that the “environmentally superior” alternative (Alternative 1 – Reduced Density) does not meet 9 of the 12 project objectives.

Comment 11:

The EIR’s analysis of the Projects diesel emission related health impacts has been substantially revised since the draft EIR was released for public review and comment. Specifically, the FEIR now includes a January 2015 study regarding health impacts from diesel engines, titled “the Advanced Collaborative Emissions Study” (“ACES”). While the draft EIR found notable cancer risks exceeding South Coast Air Quality Management District (SCAQMD) thresholds, the FEIR concludes, based on the ACES study and report that the “application of new emissions control technology to diesel engines have virtually eliminated the health impacts of diesel exhaust.” FEIR, at 4-17.

As noted by the California Air Resources Board (“ARB”), however, the use of a single study as the basis for this analysis is insufficient for the purpose of providing a comprehensive assessment of health risk from project construction and operations. ARB comment, 5. The ACES study is only one of many scientific studies related to the health risks from diesel and other mobile source emissions, and cannot by itself serve as substantial evidence regarding the Project’s impacts to human health. Id. Indeed in relying solely on a single study to reach its determination that the human health and cancer risks from diesel exhaust have been virtually eliminated runs counter to evidence presented in comments.

Response 11:

The HEI is an independent non-profit research organization founded in 1980 to provide high-quality, impartial, and relevant science on the health effects of air pollution. Typically, HEI receives half of its core funds from the US Environmental Protection Agency and half from the worldwide motor vehicle industry. Other public and private organizations periodically support special projects or certain research programs. Organizations also participate as part of steering committees and peer reviewers including the California Air Resources Board and the Natural Resources Defense Council, among others.

It is important to note that the primary purpose of ACES, on which CARB was a member of the steering committee, was to evaluate the cancer risk from new technology diesel exhaust: “the first study to conduct a comprehensive evaluation of lifetime inhalation exposure to emissions from heavy-duty 2007-compliant engines” (HEI Statement p. 1).

The HEI ACES evaluated over 100 health endpoints, but the FEIR only relied upon the report’s conclusions in its discussion and analysis of cancer risk. The HEI ACES report was not relied upon in the FEIR’s analysis of the chronic/acute hazard index or the mortality/morbidity analysis. Additionally, the study mentioned by CARB does not examine cancer health risk attributable to new technology diesel but have examined health effects from diesel trucks that emit between 10 to 100 times more emissions than the new technology that the project’s mitigation will require. As ACES Phase 1 and 2 demonstrate, new technology diesel exhaust is substantially different from traditional diesel exhaust necessitating the HEI study to evaluate the health impacts of new technology diesel exhaust. All previous studies, including those evaluated by OEHHA and cited by CARB examined the health effects of traditional diesel exhaust which date back to research done in the 1990’s and 2000’s.

The NEI study does represent substantial evidence demonstrating that new technology diesel emissions do not cause cancer. A disagreement among experts does not diminish the study’s relevance or accuracy. In any event, the FEIR used EMFAC 2014 and appropriate mitigation measures and determined there is no significant cancer risk outside of the project boundaries even without reliance on the NEI study.

Comment 12:

Moreover, the ACES study is not the only new study that has been released since the publication of the FEIR. In February 2015 the Office of Environmental Health Hazard Assessment (OEHHA) also released a new guidance document and approved risk assessment methodology contained in the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for the Preparation of Health Risk Assessments. This guidance document sets forth new methodologies for assessing health risk from diesel particulate matter (“DPM”) and other toxics, which, while generally referenced in the FEIR are either not applied, or are insufficiently applied, and the FEIR fails to explain its choice of methodology to measure health risks, and specifically cancer risk in light of the study.

Nonetheless, Table 4.3.AF in the FEIR shows the FEIR’s conclusion that the estimated cancer risks using the “Current OEHHA Guidance” after application of mitigation are substantially less after mitigation. Yet, the SCAQMD cancer risk significance thresholds continue to be exceeded at locations within the project boundaries. According to the FEIR, they are not exceeded at “at any residential areas outside of the project boundary,” but the document fails to substantiate why or how it has reached that conclusion in accordance with the updated methodology it cites as the “New OEHHA guidance”

Response 12:

The comment requests that the approved risk assessment methodology contained in the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for the Preparation of Health Risk Assessments be used. A full assessment using those guidelines is provided in the FEIR. (FEIR Volume 3, Section 4.3.3.4) Based upon those guidelines, there would be no project-related cancer risk outside the project’s boundaries. The FEIR concludes that based upon HEI ACES, that estimated risk is overestimated and that no cancer risk impact is expected from the WLC. The primary conclusion of the HEI ACES is “that NTDE would not cause an increase in tumor formation or substantial toxic health effects.” (HEI ACES Report p.3). In any event, the FEIR

used EMFAC 2014 and appropriate mitigation measures and determined there is no significant cancer risk outside of the project boundaries even without reliance on the NEI study.

Comment 13:

While the FEIR states that the analysis using the “Current OEHHA Guidance” was provided in the document to allow decision makers and the public to see the cancer-related impacts of the Project on the assumption that NTDE does cause cancer merely including this new information into the document without meaningfully applying it, or recirculating the document for public review violates CEQA’s requirements. Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 308 (“If any substantial changes are proposed in a project after review of a draft EIR, it is necessary to prepare a supplemental EIR subject to the same scrutiny”), see also, Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn. (1986) 42 Cal.3d 929, 936.

ARB has requested re-circulation on the basis that “The FEIR analysis has been revised since the draft EIR was released to include [] new studie(s) regarding the health impacts from diesel engines.” The FEIR should be re-circulated to allow the agency a meaningful opportunity to comment, and submit additional studies that would glean new information on the Project’s impacts and mitigation measures. In addition to ARB, the public, particularly residents who will be impacted most directly by the Project’s emissions from heavy truck traffic, and responsible agencies including the SCAQMD should be allowed an additional review and comment period to provide comments on this issue alone, if re-circulation is not granted for the document as a whole.

For these, and the additional reasons submitted in the remainder of this comment, as well as the comments submitted by other conservation and public health groups, the FEIR is inadequate, and its analyses are based on inaccurate, misleading information that precludes public review. As such, the document should be rejected and at a minimum, re-drafted and recirculated to cure is severe information errors and omissions.

Response 13:

CEQA Guidelines Section 15088.5 states that “new information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect”. The impacts described in the FEIR are similar to or less than the impacts described in the DEIR. New, though not significant, information added to the document responds to comments; merely clarifies or amplifies existing information; or adds new mitigation measures, any impacts of which have been fully evaluated in the FEIR. In addition, FEIR is neither inadequate nor conclusory.

Comment 14:

The DEIR fails to cure the deficiencies raised in comments to the draft EIR, regarding the omission of substantial evidence to support the conclusion that the Project will not cause significant impacts on housing supply and population characteristics in the City of Moreno Valley. Moreover, for many of the same reasons explained below in relation to the FEIR’s assumptions regarding the influx of jobs that will necessarily result from the construction and operation of the Project, the FEIR further fails to support its job creation and job benefits conclusions.

Like the draft EIR, the FEIR fails to substantiate its claims that the Project will necessarily lead to desirable, safe, full-time and permanent employment opportunities for the City’s current population. The FEIR’s analysis regarding the creation of jobs through the construction and operation of the Project is based on a single Fiscal and Economic Impact Study attached at appendix “O” of the document. While that study concludes that the construction and operation of a logistics warehouse the size of the proposed WLC will bring jobs to area, it fails to provide any detailed information regarding the level of education needed to fill those jobs, and it

similarly fails to provide any detailed comparison between the average level of education of the City's current residents and the level of education needed to successfully obtain and retain such jobs on a permanent basis. The FEIR also includes unfounded assumptions regarding the existing housing supply to jobs ratio and concludes that the Project will only "improve" that ratio by adding more jobs to the area. The FEIR fails, however, to analyze the potential impact of an influx of new residents that may be called upon to fill the jobs made available by the Project, but which have not been retained by Moreno Valley residents. Surely the creation of some 25,000 jobs or more would result in some jobs opportunities being conferred to future residents of the area, who do not currently reside in the City.

Without providing more detail regarding the Project's potential increase in demand for housing, the FEIR fails to analyze or mitigate any potential displacement effects caused by the Project. The FEIR must be redrafted and re-circulated to include such information for public review and comment.

Response 14:

The commenter is incorrect, the FEIR's conclusions regarding jobs creation and benefits are supported by substantial evidence presented in the EIR. The estimate of jobs from the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. However, these are only estimates based on information available at the time. There is no requirement in CEQA, and it would be overly speculative at best, to try to estimate what person or group of people within a particular jurisdiction would be qualified, either by education or training, to fill the various jobs that would be created by a large logistics warehousing project. It should be noted that on April 28, 2015, the City Council approved the formation of a "Hire MoVal Incentive Program" and Section 4.11 of the WLC Development Agreement outlines formation of a local hiring program consistent with the Hire MoVal program.

The commenter's statements about jobs/housing balance are also inaccurate. FEIR Volume 3, Revised Draft EIR, Section 4.13.1 and 4.13.4 explain the City's current employment and jobs/housing conditions, while Section 4.13.5.1 explains how the proposed WLC project would substantially improve the City's jobs/housing ratio as new warehousing uses are built and occupied. In addition, Section 4.15.5.2 explains why there will not be significant impacts to the City's housing stock as a result of development within the WLC project. The EIR does not indicate all new jobs will go to City residents (FEIR Volume 3, Revised Draft EIR, page 4.13-13), as shown below:

The new employment opportunities resulting from development of the proposed high-cube logistics warehouse and general warehouse uses will raise the City's current jobs-to-housing ratio by providing additional jobs to local residents. While the place of residence of the persons accepting employment provided by the proposed uses is uncertain, due to the City's projected jobs/housing ratio, it is reasonable to assume and therefore expect that some percentage of these jobs would be filled by persons already living within the City or project area. Therefore, no significant increase in population of the City would result from the development or operation of the proposed WLC project, resulting in a less than significant impact associated with growth inducement and no mitigation is required.

The Development Agreement also provides for a "local hiring center" to increase the changes that jobs within the WLC project are filled by City residents.

The commenter is incorrect that the EIR needs to be redrafted and recirculated for additional review and comment in this regard.

Comment 15:

Attached to this comment letter is a technical analysis produced by Traffic Engineer Tom Brohard, PE. [hereinafter “Brohard Letter” – attached as Exhibit A]. The Brohard Letter identifies the magnitude of this project by noting the Project will generate more than 69,000 daily trips. Brohard Letter, at 1; see also FEIR, at 4.15-46. Given the large amount of traffic associated with this Project, it is vital that the EIR accurately disclose the true traffic impacts. Brohard Letter, at 1. The Brohard letter identifies serious deficiencies that persist throughout the FEIR’s analyses, and remain inadequately addressed in the FEIR’s Response to Comments. All these traffic issues must be addressed to help inform proper disclosure and mitigation of this massive Project. The following sections provide some additional clarification on how the inadequacies in the FEIR’s traffic analyses harm the entire FEIR.

The FEIR underestimates traffic impacts in a number of material ways. This section will focus on two ways – truck share and trip length.

Truck Share

Establishing a proper truck share is vital to understanding the impacts of this Project. In particular, the FEIR assumes a low number of trucks as a share of total trips. The Brohard Letter identifies this critical flaw that the FEIR assumes these overly rosy assumptions on the number of trucks visiting this Project. Brohard Letter, at 7-8. Notably, the FEIR deviates from recommendations made by the South Coast Air Quality Management District, which are designed to ensure that the FEIR portrays a “worst case” scenario to comply with CEQA. See SCAQMD, Warehouse Truck Trip Study Data Results and Usage, available at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-studyfor-air-quality-analysis/finaltrucktripstudymc072514.pdf?sfvrsn=2>. In fact, SCAQMD recommends using a truck share percentage of 40 for projects like this that have unidentified future tenants. See CalEEMOD Guidance Appendix E, available at <http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixe.pdf?sfvrsn=2>. Here, the Project assumes almost half of that suggested amount will be trucks. The FEIR does not provide substantial evidence to support this conclusion.

Realizing the faulty reliance upon the 2003 Fontana Truck Trip Study in the DEIR, the FEIR seeks to use some limited data collection from the Skechers Warehouse to justify its low truck share. The FEIR rationalizes using this study by concluding “[t]he Skechers warehouse is representative of the warehouses planned for the project. The ITE trip generation rate, however, “is three times greater than the Skechers warehouse traffic counts.” FEIR, at 4.3-73. Thus, the conclusion is not supported by the record.

The FEIR further concludes that “the WLC is expected to have 15-to-25 different tenants from a variety of economic sectors...” FEIR Response to Comments, at 812; see also FEIR, at 3-119. There FEIR fails, however, to substantiate that claim. There is no basis in the FEIR or its attachments to support the assertion that the 15 to 25 currently unidentified tenants will be similar to the Skechers warehouse, which is a clothing and apparel company. The FEIR’s erroneous justification is further confused by the fact that also concludes that “[e]ach building may...have multiple tenants.” FEIR, at 3-119. Putting aside whether the Skechers Study, which sampled traffic numbers at the warehouse in November of 2012 for five days, is representative of the unidentified future tenants, the FEIR’s conclusion does not follow suit if anywhere from one to all of the buildings may have multiple tenants. The fact that some or all buildings will have multiple tenants makes them entirely dissimilar to the Skechers warehouse. Moreover, the study of Skechers, which looked at traffic activity during a nonpeak month for goods delivery, is not representative of conditions that will be faced at the new facility.

The FEIR includes significant new data that commenters have first been able to review in the FEIR. This is an abuse of the CEQA process, and as such, the City to reissue and re-circulate the EIR to allow proper vetting of this information.

Response 15:

The comment describes the use of the 2003 Fontana Truck Trip Study as “faulty”, but provides no basis for that assertion. The basis of the trip generation can be found beginning on p. 17 of the Traffic Impact Analysis contained in Appendix L. The Fontana Truck Trips Study represents substantial evidence having collected data from similar operations in the Inland Empire. The FEIR does not rely on the Skechers Study for trip generation purposes, rather it provides a basis for demonstrating the Fontana Truck Study is a reasonable data set upon which to base trip generation. Also, it is unclear why the commenter describes November, the month before Christmas, as a non-peak month for a clothing and shoes retailer – November is, in fact, a peak month for retailers.

Comment 16:

Truck Length

The FEIR includes new analyses never seen before to justify a trip length less than 50 miles assumed in the draft EIR. The FEIR now claims that the average truck trip length will be 30 to 40 miles. FEIR Response to Comments, at 815. Still, the FEIR provides no information on where these trips will be coming from and what growth at the facilities within 30-40 miles justify this development since it now shifted its Project Objective to only accommodate a small share of port-related cargo. Given that the FEIR includes wholly new information and analysis, the public has not had ample opportunity to vet the data. Thus, it is wholly improper to include a new technical report and traffic analysis, yet alone rely on it. This is especially the case for truck trip length because it directly impacts several other impacts, including direct, indirect and cumulative impacts along overburdened truck routes, and perhaps most importantly air quality and greenhouse gas emissions.

B. The Improper Traffic Analysis Infects the Analysis of Many Other Impacts.

Given that the FEIR has underestimated the impacts from traffic, the analysis contained in the document and in the documents relied upon, are similarly faulty. These impact areas include but are not limited to the Project’s impacts on air quality, noise, and greenhouse gasses. A proper traffic analysis is of paramount importance to a fully informative EIR. Thus, the EIR should be recirculated to cure these defects identified in the Brohard Letter and by this and other similar comments.

Response 16:

The FEIR never relied upon the 50 mile assumption as part of its transportation analysis. The transportation analysis was always based upon the RivTAM model (FEIR, Appendix L, Section 2 Methodology). The 50-mile assumption was used in the DEIR for the estimation of air quality impacts. As this over-estimated trip length as compared to the results of the RivTAM model it was considered a “conservative” analysis. Based upon the comments received, the air quality analysis was updated to rely up on the results of the RivTAM model for link-by-link emissions estimates (FEIR, p. 4.3-59). The transportation analysis did not change in any way as a result of this refinement.

Comment 17:

Seeking to obfuscate the full impacts from this Project, the FEIR dramatically reduces the GHG emissions in a manner that contradicts the core of CEQA. In particular, the FEIR claims that “GHG emissions associated with vehicle miles traveled (VMT) cannot constitute significant increases under CEQA.” FEIR, at 4.7-47. “This

regulatory conclusion is therefore directly applicable to the WLC project because VMT is by far the largest source of project GHG emissions.” *Id.* The factual predicate for this absurd conclusion is based on claims that because of “compliance with the Cap-and-Trade regulation, project-specific GHG emissions that are covered by the regulation will be fully mitigated.” *Id.* This is a fundamentally wrong conclusion that if left uncured will lead to large amounts of significant GHG emissions going unmitigated. This approach is unlawful for several reasons.

First, even though transportation fuels are now under California’s Cap and Trade Program, it is common practice for municipalities to seek to mitigate VMT because of the great need. [Exhibit B – Examples of EIRs that address VMT GHG Emissions].

Second, this approach ignores CEQA’s substantive mandate and recently adopted CEQA Guidelines related to GHG emissions. In particular, Appendix F notes that mitigation measures may include “[t]he potential of siting, orientation, and design to minimize energy consumption, including transportation energy.” Guidelines, Appendix F(II)(D). Under the FEIR’s approach, this provision would be rendered utterly nugatory because the siting of facilities in a manner to reduce fuel consumption (i.e. reduce VMT) would be irrelevant for mitigating GHG emissions.

Finally, the position of the FEIR makes no sense. Even if the FEIR is allowed to ignore mitigation measures for GHG emissions of transportation fuels, AB 32 seeks to achieve 1990 levels by 2020. This is not the end game in the effort to clean up harmful GHG emissions. In fact, Governor Schwarzenegger implemented EO-03-05 with the goal of also “reduc[ing] GHG emissions to 80 percent below 1990 levels” by 2050. Even the FEIR concedes that going beyond 1990 levels is a goal that should be sought in the Project. The FEIR notes that the “Sustainability Guidelines” for the WLC “[a]ssist in meeting California’s greenhouse gas reduction targets as set forth through Executive Order S-3-05 and Assembly Bill 32 (also known as the Global Warming Solutions Act of 2006).” FEIR, at 3-36 (see also FEIR, at 4-7.23, 4.7-24 n.3).¹ The FEIR fails to explain why the GHG targets beyond the current 2020 scope of AB 32’s duly adopted programs are relevant for the “Sustainability Guidelines” but not relevant for the mitigation of VMT. In fact, given that the cap and trade program currently does not move emissions towards the goal of 80% below 1990 levels by 2050, there will inherently be significant direct and cumulative unmitigated GHG emissions from this Project. Moreover, even if there are policies geared to achieve the 80% below 1990 levels by 2050, the Project concedes that GHG issues are global in nature, but have real impacts in California. Thus, projects with VMT related emission above the 10,000 metric ton of CO₂e would need to be mitigated even if California had AB 32 programs designed to reach the 80% below 1990 levels by 2050.

This deep flaw in the FEIR is especially troubling when viewed in the context of the FEIR’s numerous omissions of other, critical pieces of information, masking the true scope of Project’s impacts. More than 379,824 metric tons of CO₂e remain un-mitigated and yet they are identified as insignificant based on the FEIR’s approach, which is antithetical to CEQA. FEIR, at 4.7-54 (Table 4.7.J). For context, Commenters point out that if a stationary source resulted in the same level of emissions in Riverside County, it would be the third largest GHG emitter in the County. [Exhibit C – Spreadsheet Showing Largest GHG Stationary Sources in Riverside County]. Only two aging power plants would emit more than this source. Because this approach cannot be reconciled with CEQA, the FEIR should be rejected with instructions to prepare a recirculated draft of the document that includes significantly more mitigation measures to curb this large amount of GHG emissions. These mitigation measures should include the use of zero and near-zero emission technologies.

Response 17:

The FEIR appropriately relies on AB32 and the Cap and Trade program to help address project-related greenhouse gases. As long as AB32 and Cap and Trade remain in effect, the State has created a pool of allowable carbon emissions from select emission source sectors (e.g., fuels and energy). The size of the pool of allowable carbon emissions (known as allowances) is set by the State and is independent of the needs of any specific project. To the degree that users of carbon emissions reduce demand, other users of carbon emissions can use up the available capacity. Since price of the allowances is determined by demand, any reduction in demand will not mean fewer emissions (which set by the establishment of the available pool by the State), it will mean lower prices for the remaining users of carbon emissions. In this manner, users that can reduce their need for allowances at a lower cost than the market price for an allowance will do so, resulting in the reduction of carbon emissions to the level established by the State at the lowest possible cost. Other carbon users will then be able to purchase the remaining allowances due to reduced demand and price resulting in no change in carbon emissions. Ultimately, mitigation of fuel-based GHG emissions (or any capped emissions) will not result in reductions of GHG emissions since other allowance users will be able to emit additional emissions.

Because of the policies put in place by the State of California, the FEIR appropriately takes responsibility for those emissions which it has a direct control (uncapped emissions not part of the State's Cap and Trade program), but not the emissions for which the State has already set an aggregate cap which WLC project has no ability to influence. These issues are fully described in the FEIR Volume 3, Section 4.7.

Comment 18:

The Air Quality analysis in the FEIR is designed to mislead the public and decisionmakers. Instead of accepting the fact that this project seeks to build the largest diesel magnet source in Riverside County, which receives a score of "F" for ozone and particulate pollution, it seeks to provide an overly rosy picture of the air quality landscape. See American Lung Association, 2015 State of the Air, [Attached as Exhibit D]. CEQA does not support this attempt to sugarcoat a major project of this sort.

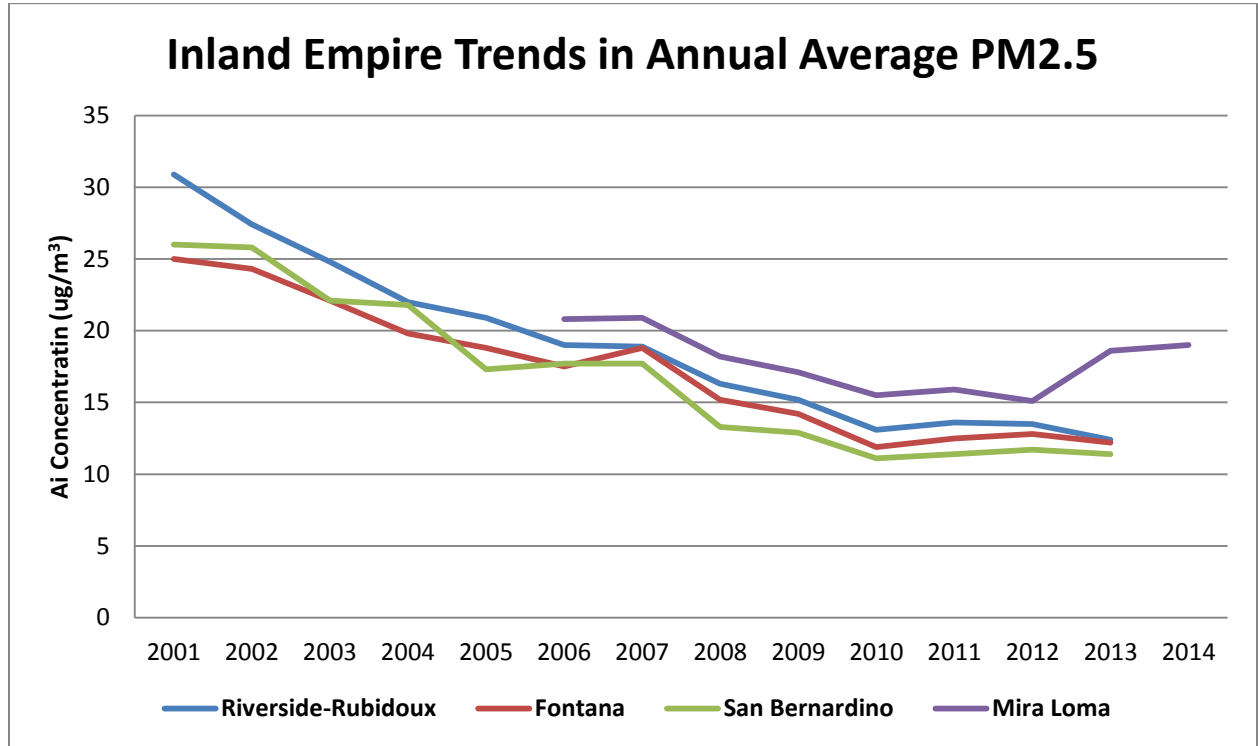
A. The FEIR Ignores Current Trends in Particulate Matter.

In response to many comments related to the air quality impacts of the project, the FEIR seeks to take solace that "[i]n the Inland Empire there is a marked decreasing trend in PM2.5 concentrations in Riverside-Rubidoux, Fontana, and San Bernardino from 2001 to 2012 and at Mira Loma from 2006 to 2012. The relevance of these trends is that PM2.5 levels have displayed a decreasing trend in the Inland Empire despite increases in urban development including the development of large warehouse complexes since 2001. FEIR Response to Comments, at 217. The FEIR conveniently ignores the data on PM2.5 from 2012 until today. Importantly, 2014 data actually shows an increase in annual PM2.5 levels for many of the monitors relevant to this project. The FEIR provides no justification for ignoring the 2013 and 2014 data in its push that particulate matter levels are improving. [Exhibit E – Comments on EPA recent rulemaking and PM2.5 levels]. Even with the underreported truck assumptions in the FEIR, this project will be one of largest truck magnet in the state. This poses serious issues for attainment of state and federal air quality standards.

Response 18:

Any single year or two does not make a trend due to year-to-year variations in meteorological conditions, such as drought conditions that increase fugitive dust emissions and from one-off events such as wind-blown dust storms and emissions from forest fires. The overwhelming evidence of historical air quality data demonstrates that the region is able to continuously improve air quality as the population and economic activity continue to grow and, at the same time, ambient air quality standards become more stringent. This evidence is shown in the

accompanying figures that display a decreasing trend in PM2.5 air quality in the Inland Empire from 2001 to 2014.



Source: <http://www.arb.ca.gov/adam/topfour/topfour1.php>

Comment 19:

B. The FEIR Discounts Feasible Mitigation without Sufficient Justification.

With no sufficient justification, the FEIR discounts many mitigation measures aimed to ease the health burdens that will be imposed by this project. The magnitude of this Project demands robust mitigation. While many of the dismissed mitigation measures should be adopted, we highlight two particularly egregious examples from the Comments. First, in Response to Comment F-9A-39, the FEIR claims funding health facilities near the project is infeasible. The FEIR claims this mitigation is infeasible without reconciling the fact that the only other larger diesel magnet sources in the South Coast Air Basin - The Ports of Los Angeles and Long Beach - have determined such programs to be feasible. It is not "impossible to determine what population should be served by such a program." FEIR Response to Comments, at 822.

The Ports of Los Angeles and Long Beach have done just that. At the Port of Long Beach, staff used Arc GIS, a tool used in the preparation of this EIR, to identify zones where funding should take place. See Port of Long Beach, Community Mitigation Grant Program Zone Maps, available at <http://www.polb.com/environment/grants/apply/zonemaps.asp>.

Blanket statements of impossibility without one iota of justification do not satisfy CEQA's disclosure mandate. Moreover, the Port of Los Angeles bounded its Harbor Community Benefit Foundation program to the communities of San Pedro and Wilmington. In addition, both of these ports are located in the South Bay region, which has multiple sources of air pollution that can contribute to negative health.

Response 19:

The ports are a very different type of operation from the proposed WLC with much greater emissions and less emissions controls. The ArcGIS tool mentioned in the comment does not identify impacted residents, rather it outlines an arbitrary benefits zone in proximity to the ports. There is no direct correlation between the zones selected and actual impacts. The FEIR identifies three types of air quality impacts. The first is regional pollutants which impact the region at large. The FEIR found significant impacts to the region (p. 4.3-85 and p. 4.3-105), with this analysis is not possible to identify specific individuals impacted. The second is ambient concentrations (LSTs), which the FEIR found no impacts outside the project boundaries (p.4.3-98). The third analysis focused on health impacts, which the FEIR found no impacts outside the project boundaries based upon the use of updated EMFAC 2014, the latest OEHHA methodology (p. 4.3-123), and appropriate mitigation. Since the two analyses that provide information about local impacts found no significant impact outside the project boundaries, there is no need for a community benefits program as additional mitigation. The analysis which found regional impacts does not distinguish individuals impacted because the emissions contribute to regional concentrations and move with meteorology. As result, it is not possible to spatially resolve impacted individuals throughout the region.

Comment 20:

Second, the Project should not be able to reject the requirement to use zero emission technologies as part of the Project. The Project seeks to use the requirement that trucks be 2010 or later model to shield it from truly mitigating the impacts of this Project. Several agencies have weighed in that this is feasible technology now, and the FEIR fails to articulate why these requirements could not be implemented in the timeframes for this Project.

Response 20:

The WLC Project FEIR is a programmatic EIR that analyzes the environmental impacts and require mitigation for a long-term project that will be implemented in increments over many years. Each subsequent increment will be subject to further environmental review and may require additional mitigation if additional impacts are found or previously infeasible mitigation becomes feasible. Due to the programmatic nature of the document, it is not known who future users of the WLC will be or what their operational needs will require in terms of equipment. As a result, all mitigation relies on commercially available technology that meets the most stringent environmental standards. As CARB knows, planning for zero-emission technology in the freight sector is incredibly difficult, as demonstrated by CARB's ongoing multi-year planning (not implementation) effort to do so on the Sustainable Freight Plan to lay out pathways to get to a zero-emission freight sector.

As CARB has stated, there are no commercially available zero-emission on-road heavy-duty trucks available (See RTC Master Response-3). CARB's own progress report on heavy duty technology and fuels assessment (Draft Heavy-Duty Technology And Fuels Assessment: Overview, April 2015) overview states that the zero and non-zero emission technologies are still at the demonstration phase:

“Demonstrations are underway across the State in a wide array of heavy-duty applications including drayage trucks, delivery trucks, school buses, and some types of off-road equipment.”

“Achieving the successful transition to zero and near-zero emission technologies will be challenging and will take time and money to realize.”

“Staff is assessing additional zero emission vehicle and equipment platforms in the concept, demonstration, or pilot scale deployment stage in the heavy duty sector. Examples include drayage trucks, delivery trucks, and selected types of cargo handling equipment (CHE) such as yard trucks. These technologies are limited today by cost and in some cases performance. As these technologies mature, moving from demonstrations to pilots and early commercialization, costs will decrease and performance will improve.”

Not only are none currently available, it is not currently known when such trucks will become available, what technology they will rely (an important requirement for refueling/recharging requirements), or what operational capabilities such equipment might have such as range or load. The project can commit to requiring all trucks meet U.S. EPA 2010 standards (Mitigation Measure 4.3.6.3B) because it is not question of commercial availability – all new trucks must meet these standards – it is a question of what subset of the truck fleet will serve the WLC.

Similarly with off-road equipment, there is no zero-emission standard for such equipment. While some electrical equipment does exist, it does not exist in for all operational requirements. However, all onsite equipment is available in non-diesel technologies. Subsequent environmental review may require that specific technology that will work with future users be required as condition of approval, but a broad requirement that unknown future users use a specific technology is not currently feasible since current zero-emission technology is very limited.

Comment 21:

The FEIR maintains several of the same deficiencies outlined in comments on the draft EIR by conservation groups, the US Fish and Wildlife Service, the California Department of Fish and Wildlife (“CDFW”), and the public.

A. Failure to Properly Disclose and Analyze the Scope of Impacts to the Project Area’s Biological Resources

The FEIR’s improper representation of the area along the southern portion of the Project area as a “buffer” that will mitigate the Project’s construction and operations impacts dangerously misleads the public and prevents the City from requiring mitigation measures necessary to minimize the Project’s significant impacts of sensitive, threatened and endangered species and habitats in the SJWA. Indeed the inclusion of the misleading “buffer” references in the FEIR Project will cause detrimental, significant impacts on lands already set aside for permanent conservation, in violation of CEQA. San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus, 27 Cal. App. 4th 713, 722. Moreover, as explained above in reference to the inadequacies of the Project description, the FEIR fails to adequately disclose and analyze the Project itself, adjacent areas of biological significance, and impacts to biological resources.

Response 21:

The “CDFW Conservation Buffer Area” name refers to the fact that it is owned by the State and that the State purchased the property to incorporate into the SJWA and buffer the SJWA from development to the north as: “The DFG has identified the subject properties as being within a Significant Natural Area and has recommended the purchase of the property as an addition to the existing WLA. The acquisition of the subject properties are important to the wildlife area as they will serve as a buffer from development north of the WLA and adds significant wildlife benefits to the WLA.” [emphasis added, citation from Wildlife Conservation Board

Meeting Meetings, May 18, 2001, page 56]. Section 4.4 of the FEIR analyzes the impacts of the proposed project, including to the CDFW Conservation Buffer Area and to the SJWA as well.

Comment 22:

For example, by improperly referring the “CDFW parcels” as a “buffer” the FEIR fails to disclose or analyze the riparian/riverine and hydrological features of the property, as further explained in the comments submitted by the Center for Biological Diversity and the San Bernardino Audubon Society. The failure to disclose these impacts prevents the FEIR from conforming to the Western Riverside County Multiple Species Habitat Conservation Plan (“MSHCP”). This includes failing to perform an adequate Determination of Biologically Equivalent or Superior Preservation (“DBESP”) as required by the MSHCP.

Response 22:

As can be seen from Figure 4.4.2 in Section 4.4 of the FEIR, the drainages within the CDFW Conservation Buffer Area are included in the analysis. FEIR Section 4.4 also extensively analyzes the project’s potential impacts relative to the MSHCP and determined the project as proposed with recommended mitigation would be fully consistent with the MSHCP requirements, and no significant impacts would occur. The commenter is incorrect, a programmatic DBESP report was prepared for the WLC project and is included in FEIR Volume 2 Appendix E-7.

Comment 23:

The FEIR’s deficiencies further preclude adequate analyses of impacts and mitigation for the regional MSHCP and local plans. In analyzing consistency with applicable local General Plan Policies the FEIR states “[t]here is no riparian habitat within the Specific Plan area.” FEIR at 442. However, the FEIR itself contradicts this statement in finding that “[f]ive drainage features (Drainages 7, 8, 9, 12 and 15) were determined to be riparian/riverine under MSHCP guidelines and waters of the state subject to CDFW and RWQCB jurisdiction under Section 1600 of the Fish and Game Code and Porter Cologne Act respectively.” FEIR at 438. The FEIR also fails to disclose and analyze impacts to drainage 14 that contains southern willow scrub that provides habitat for the least Bell’s vireo and southwestern willow flycatcher. DEIR App. E at 54, 120. The FEIR attempts to dismiss the impacts to this riparian habitat by citing to a portion of the MSHCP, which purports to minimize the requirements to analyze impacts to riparian/riverine resources that are artificially created. FEIR, 4.42. However, this does not satisfy CEQA’s requirement to disclose, analyze, and mitigate impacts to sensitive habitat and wildlife. The FEIR goes further in masking the conflict with applicable plans by claiming that the riparian areas containing riverside sage scrub, southern willow scrub, and mule fat scrub are not natural drainage courses requiring preservation under mitigation under the Moreno Valley General Plan Policy 7.4-3. The EIR’s failure to adequately disclose and analyze the Project’s impacts to riparian features and conflicts with local policies violates CEQA.

Response 23:

The comment answers its own question by recognizing that there is a difference between riparian/riverine features and riparian/riverine habitat as defined in the MSHCP guidelines. Nonetheless, the FEIR is through in its discussion of both as discussed in RTC F-1-19 and F-1-20.

Additionally, the FEIR at p. 4.4-87 addresses the potential impact on least Bell’s vireo and southwestern willow flycatcher, finding no impact: “The project area does not contain habitat suitable for covered riparian species, such as least Bell’s vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.”

Comment 24:

The inadequacy of the FEIR's analyses masks severe impacts on burrowing owls and the Los Angeles Pocket Mouse ("LAPM"). As noted in previous comments the FEIR fails to adequately disclose and analyze impacts to burrowing owl. The FEIR also fails to adequately analyze impacts to LAPM because the biological surveys upon which its analyses of species impacts are based purport to capture similar species, such as long tailed pocket mice and desert pocket mice even though the range of those species does not include the project area. Because the inclusion of these studies does not address the impacts to the LAPM, borrowing owl or other threatened species, the FEIR must be re-circulated to disclose the survey results for those species in order to determine whether the document provides the substantial evidence required to demonstrate that the species captured were not LAPM, which is a protected species under the MSHCP.

Response 24:

The FEIR contains a complete analysis of the LAPM. Multiple surveys were carried out as described at FEIR p. 4.4-93 and Appendix E. There is no basis for the contention that surveys misidentified the various mouse species. Likewise, the FEIR contains an analysis of the impacts on the burrowing owl (FEIR p. 4.4-94 and Appendix E). The comment does not identify any inadequacy in the burrowing owl surveys other than to claim that the "analyzes masks severe impacts".

Comment 25:

Despite the Project's potential impacts on the burrowing owl and other species, the FEIR also fails to adopt feasible mitigation measures recommended by the US Fish and Wildlife Service, and the CDFW's request that a relocation plan be developed for any burrowing owls that may be found on the project site. FEIR Appendix E-16, Comment 4. The CDFW points out that burrowing owls have been found on the project site in the past, however, the FEIR takes erroneous position that the FEIR and specific plan are "not a vehicle to establish/enforce environmental mitigations nor does the City of Moreno Valley... place conditions on th[ese] documents." FEIR Appendix E-16, Response to Comment 4. This response clearly misinterprets CEQA's requirements that mitigation measures be concrete and enforceable, and mis-states the City's obligation to require mitigation of the Project's significant impacts before approving the Project.

Response 25:

The comment misrepresents the response contained in FEIR Appendix E-16. The comment does not say the "FEIR and Specific Plan", it states that the Specific Plan, a planning document, is not the vehicle for mitigation. The comment then goes on to say to discuss the requirements of the MSCHP Consistency Analysis and mitigation measures contained within the FEIR. The response concludes by stating that the mitigation CDFW is seeking (burrowing owl relocation plan) is already required by the MSCHP Consistency Analysis and is included as Mitigation Measure MM Bio-6g.

Comment 26:

The FEIR further fails to disclose additional impacts to wildlife corridors or analyze conflicts between the MSHCP's requirements for wildlife and species protections in those corridors. The Project has the potential to severely impact wildlife movement between the San Timoteo Badlands, the San Jacinto Wildlife Area, Core H of the MSHCP, and Lake Perris. The building developments, road construction, and traffic components of the Project, create a certain obstruction to wildlife movement between these regionally important areas.

As noted above, the FEIR also fails to adequately describe how the existing drainage systems in the areas surrounding the Project, specifically including the "CDFW parcels" will impact potential wildlife movement, and the FEIR summarily dismisses the Project's potential impacts on wildlife movement in direct conflict with

the MSHCP, and improperly rejects several specific mitigation measures proposed by the US Fish and Wildlife Service and CDFW. For example, the FEIR asserts that it cannot coordinate with the County of Riverside on fencing the area northeast of Gilman Springs Road because the Project owner is not the owner of that property. However, there is no evidence that the project proponent or lead agency even approached the County about implementing such a mitigation measure. This mitigation measure would also be a proper subject for any annexation proceedings that are necessary for the Project, yet any analysis of those proceedings remain absent from the FEIR.

Response 26:

The FEIR analyzes, in detail, the potential impacts and proposes specific mitigation to address potential impacts in FEIR Sections 4.4.3 – 4.4.7. Section 4.4.5.2 specifically examines wildlife movement and corridors. It should be noted that the property east of Gilman Springs Road is sparsely populated at present with only a few rural residences east of the WLC property.

Mitigation measures that are outside the jurisdiction of the City of Moreno Valley are infeasible since the City does not have the ability to control the timing or manner of implementation or even if such mitigation measures would be implemented at all.

Comment 27:

The US Fish and Wildlife Service and CDFW, who are implementing agencies on the MSHCP, have denied their approval of the FEIR's purported analysis of the Project's impacts and mitigation measures, stating:

“We cannot concur with the conclusion ... regarding site hydrology, assessment of riparian/riverine resources, the presence of Los Angeles pocket mouse and redirection of wildlife movement around the site ...”

FEIR Appendix E-16, Comment 12.

For these, and the additional reasons set forth in comments submitted by the Center for Biological Diversity and the San Bernardino Audubon Society, the deficiencies in the FEIR must be addressed before final consideration of the Project.

Response 27:

The commenter misrepresents the comment and does not show the response. The agencies are discussing the DBESP process, which continue throughout the development. Below is the full comment and response:

Comment 12:

We would also like to discuss the results of the Los Angeles Pocket mouse surveys, and as stated above, request copies of the latest survey reports. Prior to completion of the DBESP process, we request a hydrology report that addresses existing flows to the rare alkaline plant community on the SJWA and expected changes in those flows in the presence of the proposed basins at the southern edge of the project. We cannot concur with the conclusion in the DBESP until our questions regarding site hydrology, the assessment of riparian/ riverine resources, the presence of Los Angeles pocket mouse and redirection of wildlife movement around the site are resolved and a strategy the is equivalent or superior to avoidance has been identified.

Response 12:

The requested focused survey reports will be provided to the Agencies. In connection with project-specific applications, additional LAPM surveys will be prepared and processed.

A program-level Hydrology Report (September 2014 CMH2Hill) was prepared as part of the Specific Plan. Wildlife Agencies will be provided a site-specific project Hydrology Report when site-specific projects are proposed. The project is required to maintain the same amount of flows off-site after construction that currently occur pre-construction. In addition, the accumulated run-off from the impermeable surface of the project site will provide more available moisture that will be contained within the detention basins, which will then percolate and contribute to the sub-surface flows.

Comment 28:

As noted above and throughout this comment, the Project's goal of constructing a 2,382 some odd acre warehouse and supporting other logistics-oriented land uses for the Specific Plan area now, and indefinitely into the future involves multiple actions and approvals from the City. See FEIR, at Ch. 1. Accordingly, the FEIR sets forth mitigation measures that it asserts will address the impacts from all of those actions and approvals. Id. Despite the FEIR's inclusion of such mitigation measures, however, as a program-level or "tiered" EIR, the FEIR improperly defers the impacts analyses necessary to provide meaningful mitigation at this stage of environmental review. Moreover, because the Project as defined in the FEIR includes specific development commitments – including the commitment to construct and operate the world's largest logistics warehouse – the Project approvals before the City require the preparation of a project-level EIR in addition to any broader program-EIR analyses before they can be issued. Citizens for a Sustainable Treasure Island v. City and County of San Francisco (2014) 227 Cal.App.4th 1036, 1051 (“[t]he degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity”); see also San Diego Citizenry Group v. County of San Diego (2013) 219 Cal.App.4th 1, 2.

“While proper tiering of environmental review allows an agency to defer analysis of certain details of later phases of long-term linked or complex projects until those phases are up for approval,” CEQA's demand for meaningful information is not satisfied by simply stating, or basing an EIR's analyses on inadequate or incomplete information, or information that will be provided in the future. California Clean Energy Committee v. City of Woodland (2014) 225 Cal.App.4th 173, 200 (citing Santa Clarita Organization for Planning the Environment v. County of Los Angeles (2003) 106 Cal.App.4th 715, 723). As the CEQA Guidelines explain: “Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.” Guidelines § 15152, subd. (b).

Tiering is properly used to defer analysis of environmental impacts and mitigation measures to later phases of a project only when the impacts or mitigation measures are not determined by the first-tier approval decision. See California Clean Energy Committee v. City of Woodland, supra, 225 Cal.App.4th 173. In such cases, the later phases that are subject to future environmental analyses are specific to aspects of the Project that are unknown at the time of initial environmental review. Ibid. Such aspects are considered “speculative” and as such, must be analyzed in subsequent environmental review document. Id. In the context of large land use and development projects, the courts have found tiering to be an appropriate way of evaluating future project aspects such as the aesthetic impacts of parking spaces – aspects of the project which present “speculative possibilities” of potential impacts, but do not necessarily present “substantial evidence of an environmental impact.” Id. (evaluating the use of a tiered EIR for the development of a 234 acre shopping center project on undeveloped

agricultural land); see also, *Pala Band of Mission Indians v. County of San Diego* (1998) 68 Cal.App.4th 556, 577 (citing to *Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748 for the proposition that “[s]peculative possibilities” regarding future projects are not “substantial evidence of environmental impacts”).

Here, however, the City is aware of, but fails to fully analyze the Project’s true impacts; and yet the FEIR attempts to mitigate those impacts notwithstanding the critical lack of information provided in the document. Its sole basis for doing so is, erroneously, that it provides a “tiered” program-level review of the impacts of the Specific and General Plan land use changes as well as the construction and operation of the WLC.

The FEIR purports to analyze and mitigate the Specific Plan’s deviations from the previously approved Specific Plan, but fails to adequately do so. This includes the land use and zoning changes needed to effectuate the Project – in essence, the construction and operation of the WLC, as well as the long term commitment of the Specific Plan area to logistics uses. The FEIR then purports to assess the impacts of any deviations between the Specific Plan and the City of Moreno Valley’s 2006 General Plan, and finally, it sets forth an analysis of and mitigation for the anticipated impacts of the construction and operation of the WLC. Without further information regarding the Project’s impacts, however, such mitigation efforts are illusory. The FEIR refers only generally to a host of deviations between the Specific Plan land use changes and the land use designations contained in both prior Specific Plan as well as the General Plan. See FEIR, at 3.118, 4.1-1, 4.1-71-80. The FEIR also inaccurately describes the Project and the Project area, incorporating numerous deficiencies as explained above in section I.A.ii.

While the City may analyze certain changes to the General Plan in a programmatic EIR, it cannot reasonably analyze the impacts of the Project in the same programmatic EIR for at least two principal reasons. First, the construction and operation of the WLC – the primary subject of the Specific Plan land use changes under consideration for approval by the City here – involves binding, project specific agreements between the City and Highland Fairview. Such agreements are in fact identified in the FEIR, by its reference to the “development agreement” as a project component, subject to the City’s approval. The EIR is therefore required to contain a more detailed level of information than that which is generally required of a program-EIR. See *Citizens for a Sustainable Treasure Island v. City and County of San Francisco*, supra, 227 Cal.App.4th, at 1051 (citing to the CEQA Guidelines to state that “a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan....”). Second, the impacts of the construction and operation of the WLC are to a large extent known now, at the time of environmental review, yet they are absent or otherwise improperly analyzed in the document. Indeed the FEIR’s claim to set forth mitigation measures to address such impacts shows that the FEIR attempts to analyze and mitigate those impacts. As stated above, however, a tiered or program level EIR is permitted only where “an EIR cannot provide meaningful information about a speculative future project.” *Pala Band of Mission Indians v. County of San Diego*, supra, 68 Cal.App.4th, 577 (citations omitted). Where it can, “the deferral of an environmental assessment” violates CEQA. *Ibid.* The City is therefore prohibited from approving the FEIR as “a document which envisions future action without a commitment to future environmental review.” *Id.*

In sum, regardless of whether the City intends to conduct further tiered EIRs for parts of the project, the FEIR for the WLC is defective because it sets forth mitigation measures that are based on an inadequate assessment of the full range of impacts that may result from all of the Project components including the land use changes in the Specific Plan, and its deviations from the General Plan, the construction and operation of the WLC and the execution of the development agreement between the City and Highland Fairview. As such, the document fails as an information document under CEQA, and must be rejected and re-circulated to provide an adequate

analysis of each of the actions necessary to effectuate the Project, before the City may take any action to approve or further the Project's goals. Save Tara v. City of West Hollywood (2008) 45 Cal.4th 116, 138 (agencies must not "take any action" that significantly furthers a project before conducting adequate CEQA review)

Response 28:

The commenter is incorrect; the Project does not contain a "commitment to construct". The Project is only a set of changes to allowable land uses. The EIR clearly states that more detailed CEQA analysis will be performed once more specific project-level data and plans are submitted to the City for review (future site plans, plot plans, etc.) consistent with the programmatic WLC Specific Plan (FEIR Section 3.7.2 – City of Moreno Valley – Future Approvals, p. 3-114). The project under consideration is a specific plan that serves as planning document, no project-specific information is currently known. At this time, no plot plans are being considered, future tenants are not known, and building sizes for future tenants have not been established. In short, the necessary information for a project-level document will be known when the first plot plan is proposed. The Development Agreement locks in the project planning and fees for 10 to 25 years but does not commit to the development of any specific structures.

Comment 29:

The FEIR includes as an attachment, a statement of overriding consideration that is still in draft form, and is insufficient to justify the Project's significant and unavoidable impacts for the reasons explained below. Although the statement's terms are provided in the proposed draft statement, they are insufficiently analyzed in both the draft EIR and in the FEIR. Moreover because the FEIR as a whole suffers from serious deficiencies that taint the whole of the analyses contained in the document, the draft statement cannot adequately weigh the Project's adverse, significant impacts with the espoused benefits from the Project contained in any statement of overriding considerations. Vedanta Society of So. California v. California Quartet, Ltd. (2000) 84 Cal.App.4th 517, 530 (a project with significant and unmitigated environmental impacts can only be approved when "the elected decision makers have their noses rubbed" in the Project's environmental effects, and still vote to move forward). As such the statement and its purported benefits must be rejected.

As the lead agency for the Project, if the City is to approve a project of this magnitude, and with the unmitigated significant environmental and human health impacts that the Project will cause, it "must adopt a statement of overriding considerations." Pub Res. Code § 21081, subd. (b); Guidelines, § 15093. In contrast with mitigation and feasibility findings, overriding considerations can be "larger, more general reasons for approving the project, such as the need to create new jobs, provide housing, generate taxes, and the like." Concerned Citizens of South Central L.A. v. Los Angeles Unified School Dist. (1994) 24 Cal.App.4th 826, 847. Yet, like mitigation and feasibility studies, a statement of overriding consideration is also subject to a substantial evidence standard of review. Sierra Club v. Contra Costa County (1992) 10 Cal.App.4th 1212, 1223; Guidelines § 15093, subd. (b)." Thus, an agency's unsupported claim that the project will confer general benefits is insufficient, and the asserted overriding considerations must be supported by substantial evidence in the FEIR or somewhere in the record. Sierra Club v. Contra Costa County (1992) 10 Cal.App.4th 1212, 1223; Guidelines §15093, subd. (b)."

As part of the EIR review process, statements of overriding consideration are intended to "vindicate the 'right of the public to be informed in such a way that it can intelligently weigh the environmental consequences' of a proposed project[;]" and they must make a good-faith effort to inform the public of the risks and potential benefits of the Project whose approval is proposed. Woodward Park Homeowners Ass'n, Inc. v. City of Fresno (2007) 150 Cal.App.4th 683, 717-718 (citing Karlson v. City of Camarillo (1980) 100 Cal.App.3d 789, 804).

In accordance with this standard, before approving the Project and the FEIR the City must show that it has considered each of the Project's significant and unavoidable impacts in light of each of the alleged overriding considerations that it asserts will justify those impacts. Cherry Valley Pass Acres & Neighbors v. City of Beaumont (2010) 190 Cal.App.4th 316, 357 (upholding a statement of overriding consideration on the basis that "the City found the project had eight benefits, each of which 'separately and individually' outweighed its unavoidable impacts). Thus, the City must specifically consider and set forth overriding considerations to justify the Project's significant and unavoidable direct indirect and cumulative impacts in each of the following areas: aesthetics, land use and biological resources, noise, traffic and air quality. See generally, Draft Facts, Findings and Statement of Overriding Considerations ("Draft Statement of Overrid.").

The draft statement of overriding consideration attached to the FEIR asserts two general areas of benefits that it asserts outweigh the Project's significant and detrimental, un-mitigated impacts: (1) an increase in jobs that improves the job to housing ratio in the City of Moreno Valley, and (2) an increase the in the City's overall tax revenue, which could be used to improve schools and confer other public benefits to the residents of the City. Draft Statement of Overrid., at 211. Any additional public benefits that the draft statement assumes may result from approval of the Project flow from one of those two underlying considerations.

These two alleged benefits are, however, based on erroneous assumptions that (a) the Project will bring secure, desirable and certain jobs to the City of Moreno Valley; and (b) that the environmental degradation caused by the Project's significant and unavoidable impacts will not outweigh the benefits conferred by the Project in monetary terms, or based on any other form of valuation methodologies. While the draft statement sites thoroughly to "appendix O" the Fiscal and Economic Impact Study prepared by Taussig & Associates, it fails to account for aspects of the job market that will undoubtedly impact the nature and desirability of the jobs made available at the Project, if it is approved, constructed and permitted to operate. Just some of these unmentioned aspects include trends towards employing largely contract, part-time or temporary or short-term labor to fill the jobs created by the WLC. Indeed the study is based on an assumption that either the WLC or other logistics uses will result in the permanent employment of .5 employees per 1,000 building square feet. Appendix O, at 20. Yet the study fails to calculate what the rate of employment would be if some or all of those jobs were characterized as part-time or temporary contract labor employment.

The draft statement of overriding considerations similarly fails to account for any discrepancy in full-time vs. part time, temporary or contract jobs. Moreover, additional aspects of job desirability including working conditions for laborers employed at the WLC or similar logistics enterprises that would operate in the project area are left wholly omitted from both the Taussig & Associates study and the draft statement, and to the extent the draft statement relies on the development agreement to ensure that such jobs are actually ensured, such assurances are illusory as the development agreement terms remain unclear.

Response 29:

Section VI of the Resolution lists a number of benefits, such as jobs and taxes, which support or justify approving the project. The Fiscal Study adequately addresses the type of jobs expected: "General economic impacts include additions to the City's employment (number of average annual full- & part-time jobs), economic output (e.g., gross receipts), and earnings (the sum of wages, salaries and benefits, other labor income, and employer and employee contributions to social security). (emphasis added, FEIR Appendix O, p. 2)." In addition, the Fiscal Study states, "DTA's analysis is based on the assumption that the Project will directly employ 0.50 employees per 1,000 building square feet. These employees are Full Time Equivalent ("FTE") employees, meaning that part-time employees are only counted based on the percentage of forty (40)

hours per week that they are working. Understandably, it takes two half-time (1/2) employees to equal one FTE employee. (FEIR, Appendix O, p. 19).”

Comment 30:

The draft statement of overriding considerations also fails to adequately quantify, either monetarily or based on some other form of valuation method, the consequences of the Project’s impacts, specifically including its impacts to human health, the environment and invaluable threatened and endangered biological resources that surround the proposed project area. Weighing the Project’s true impacts against its purported benefits is a critical environmental review requirement. See Woodward Park Homeowners Ass’n, Inc. v. City of Fresno, 150 Cal.App.4th, 720. The City must therefore engage in a good faith effort to thoroughly analyze of the full scope of the impacts for which the statement of overriding consideration is being offered. Doing so here would involve some process by which to measure conclusory statements that fully contradict the evidence on the record, such as the statement that the Project will improve health public health. Draft Statement of Overrid., at 223.

Response 30:

The FEIR contains an exhaustive analysis of the projects impacts on the environment and human health. Attempts to monetize the impacts described in the FEIR are speculative and go beyond the requirements of CEQA. The impacts in all resource areas have been described and all feasible mitigation measures have been adopted. See Executive Summary (FEIR, Section 1) for a full description of the impacts and mitigation measures analyzed for this project.

Comment 31:

Finally, the draft statement of overriding considerations fails to justify the Project’s impediment to the South Coast Air Basin achieving federal and state NAAQS, and it’s steady, foreseeable future contribution to the region’s ability to meet Air Quality Management Plan targets, which are essential to ensuring compliance with state and federal law. The statement of overriding consideration cannot, in essence justify the Project’s apparent conflict of potentially causing violations of air quality standards, which carry severe economic sanctions for the 18 million people living the South Coast Air Basin based on parochial economic justifications for one city.

Response 31:

The FEIR identifies mitigation that goes beyond what has been achieved by any other project of its kind. Through the commitment to the use of Tier 4 construction equipment (MM 4.3.6.2A) and the requirement that all trucks meet U.S. EPA 2010 standards (MM 4.3.6.3A), the project is accelerating the adoption of clean equipment in Southern California. Based upon currently available technology (as no commercially available zero-emission heavy-duty trucks exist), any new project contributes to continuing violations of ambient air quality standards. However, the air quality control agencies have not adopted a zero-growth policy. Rather, continuing advances in pollution control technology applied state-wide have led to decades of steadily improving air quality.

The decision whether to approve the project is up to Moreno Valley’s elected City Council and to weigh the project’s environmental impacts, thoroughly analyzed in the FEIR, and its benefits as set forth in the Statement of Overriding Considerations, and then to decide what action best furthers the public’s health, safety, and general welfare.

MEMORANDUM

DATE: June 10, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to Letter from Inland Empire Waterkeeper dated June 5, 2015**

In a letter dated June 5, 2015, Garry Brown with the Inland Empire Waterkeeper submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

Comment I-A:

The Proposed Detention Basins Will Not Be Able to Adequately Control Runoff. Detention basins are designed to control peak flows and infiltrate some water, but are not the same as infiltration basins. Detention basins are used to slow down stormwater runoff, not to infiltrate large amounts of water. As the FEIR notes, water flows from the Badlands and the 60 freeway into the project site, where it then continues through the San Jacinto Wildlife Area and wetlands. To contain this large amount of water, large infiltration basins will be needed. The FEIR estimates the soil type and infiltration rate, but has not adequately examined it. WLC has presented no analysis of the effects of the large amounts of runoff that would flow into the San Jacinto Wildlife Area. To adequately mimic the natural condition of runoff flow, velocity, and volume, a more thorough analysis of the size, number, and location of infiltration basins must be conducted.

Response I-A:

The proposed detention basins will adequately control runoff. As stated in Section 4.9.6.1 on page 4.9-39, paragraph 2 of the FEIR, the detention basins are designed not only as detention basins but as combined infiltration and detention basins. The bottom two feet in depth of the basin is designed as an infiltration basin, i.e., the water will infiltrate in the ground because there is no outlet. Only when the water level rises above two feet will the water flow downstream. Table 4.9.J outlines the basin volumes for both detention and infiltration for each of the 11 basins.

As stated on page 4.9-47 of the FEIR the project's impacts will be mitigated with the implementation of infiltration basins and bioretention areas. The volume of runoff after the project is constructed will be less than the existing volume of runoff and the amount of infiltration will increase. A hydrologic analysis was performed for the pre and post project conditions based on historical runoff. The basins have been designed to ensure that the runoff matches the pre-project condition. The hydrologic analysis was based on conservative estimates of soil type and infiltration rates and will be updated with site specific information as each project is developed.

To the degree possible, the project will site basins in areas of cut that do not require over excavation, this should result in acceptable infiltration rates. In the event the soil at a basin site does not meet the required infiltration rate, dry wells, hybrid bioretention/dry wells or infiltration trenches will be used to achieve the target infiltration rate. All three of these BMP's will reach past impervious clay or compacted fill area to deeper more pervious soils. Dry wells are considered Class V wells and require submission of an "Inventory Form" to the EPA. Infiltration tests will be done prior to design of basins so that the proper BMP's can be incorporated into the basins. It should also be noted that groundwater levels in the project area are in excess of 100 feet below ground surface (DEIR Section 4.6.5.4, Geology and Soils). If infiltration declines, dry wells or other options can be used to improve infiltration better and allow habitat to co-exist in or around the basin.

The amount of runoff that will flow to the San Jacinto Wildlife Area will mimic pre-project conditions as outlined in **Mitigation Measures 4.9.6.1A and 4.9.6.1B.**

Comment I-B:

The Proposed Detention Basins Will Not Be Able to Capture a 100-year Storm Event. In the FEIR, WLC calculates that their proposed system of detention basins with limited infiltration capacity will be enough to hold the stormwater from a 3-hour and 24-hour 100-year storm event. However, it is unlikely that detention basins will be able to withstand such large storms. Even if the detention basins were able to hold back a significant portion of the runoff from a 100-year storm, detention basins are not designed to infiltrate large volumes of water. This means that while the volume of water exiting the project site may be similar to natural condition during a 100-year storm event, the duration of the discharge and its velocity would likely result in significant hydromodification of the downstream area that is not thoroughly considered in this FEIR. The project proponents must conduct a comprehensive analysis of the capacity of the facility to capture the stormwater from a 100-year storm event and the impacts of the discharge, if any, from such an event to the receiving waters.

Response I-B:

The detention basins are sized to contain the flow from the 100-year and smaller storms to mimic pre-project conditions as stated on page 4.9-39 of the FEIR. As stated in Comment 1-A the detention basins are designed as both infiltration and detention basins by allowing not outflow from the bottom of the basin. The duration and volume of water leaving the site will mimic the pre-project condition based on the combined infiltration and detention basin capacities. An analysis of the capacity of the infiltration and detention basins was performed and is contained in the Master Plan of Drainage Report. The analysis will be updated with site specific information as each project is designed.

Comment II:

The Proposed Detention Basins Will Likely Not Be Able to Adequately Control Pollutants Because They Will Likely Not Provide Enough Infiltration Capacity or Pretreatment. The project may result in surface water pollution during operation. The 40 million square foot project will turn thousands of acres of natural area into impervious roofs and roads. Storm water runoff from the roadways, parking lots, and commercial and industrial buildings can carry a variety of pollutants such as sediment, petroleum hydrocarbons, commonly utilized construction materials, landscaping chemicals, and pesticides; as well as metals such as iron, aluminum, cadmium, and toxic metals such as copper, lead, and zinc, which may lead to the degradation of downstream receiving waters. Runoff from landscaped areas may contain elevated levels of phosphorous, nutrients and suspended solids. WLC has not adequately shown that they are taking steps to control these pollutants and account for their potentially significant effect on the wildlife area that lies directly downstream from the project site. The California Stormwater Quality Association's (CASQA's) New Development and Redevelopment BMP Handbook (Handbook) shows that the only listed pollutant that detention basins remove with a "high" level of efficiency is trash.¹ This means that for virtually all other pollutants, even detention basins with some infiltration capacity are insufficient to remove all pollutants discharged to surface waters. The CASQA Handbook also adds that detention basins are relatively ineffective at removing soluble pollutants. The CASQA Handbook does not assert that the limited infiltration capability of some detention basins is enough to mitigate detention basins' ineffective removal rate of virtually all pollutants. Since the pollutants would be flowing into San Jacinto Wildlife Area and wetlands, the water flowing from the project site should not be contaminated by pollutants at all. Therefore, WLC must take steps to control pollutants, such as installing large infiltration basins with adequate pretreatment. WLC provides no analysis of the significant impact that polluted water would have upon the San Jacinto Wildlife Area and wetlands.

Specifically, detention basins only remove 40-60% of Oil and Grease. The CASQA Handbook says that detention basins have only "moderate" removal effectiveness for Oil and Grease.¹ The CASQA Handbook does

¹ California Stormwater Quality Association, *Stormwater Best Management Practice Handbook: New Development and Redevelopment*, TC-22, p.1 (2003).

not assert that the limited infiltration capability of some detention basins is enough to mitigate detention basins' ineffective removal rate of Oil and Grease. As WLC would be one of the largest master-planned warehousing complex in the world, there would be a large number of trucks delivering shipments every day. This means a significant amount of Oil and Grease would need to be removed prior to any stormwater discharging from the site or entering detention basins. Detention basins are not sufficient to remove this Oil and Grease. Pretreatment BMP's to control Oil and Grease prior to discharge into detention or infiltration basins are needed. WLC does not provide analysis of the significant effect that runoff polluted with Oil and Grease would have on the San Jacinto Wildlife Area and wetlands. Further, WLC does not provide BMPs or mitigation measures to deal with Oil and Grease.

Finally, the CASQA Handbook rated detention basins' nutrient removal capabilities as "low".¹ The CASQA Handbook does not assert that the limited infiltration capability of some detention basins is enough to mitigate detention basins' ineffective removal rate of nutrients. In addition, runoff from the WLC would enter the impaired waters of Canyon Lake and Lake Elsinore. Those two water bodies have Total Maximum Daily Loads (TMDL's) for nutrients. WLC explained in its FEIR that nutrients would be present in the stormwater from its facility. The proposed detention basins will not be able to rid the water of these nutrients, and would therefore be inadequate to satisfy the TMDL's of the impaired receiving water bodies. Waterkeeper notes that the proposed WLC discharges nutrient laden stormwater into receiving waters that are already impaired water bodies with a nutrient TMDL. This new discharge of nutrient laden stormwater to a waterbody with a nutrient TMDL would undoubtedly cause or contribute to a violation of water quality standards. Such a discharge would most likely be prohibited under the Clean Water Act. Again, for WLC to be in compliance with the TMDL's, they would have to use BMPs that are effective for removing nutrients, such as infiltration basins, not just detention basins with some infiltration capacity. In order for the environmental review process to be meaningful, and for the public and relevant agencies to be aware of significant impacts per CEQA, the method of water quality treatment of nutrients should be discussed in the FEIR.

Response II:

As stated in Section 4.9.6.3, page 4.9-55 of the FEIR, the treatment control BMP strategy for the project is to select LID BMPs that promote infiltration and evapotranspiration, including the construction of infiltration basins, bioretention facilities and extended detention basins " The CASQA 2003 Handbook states that infiltration is rated high for treating nutrients.

As stated in Section 4.9.6.3, page 4.9-56 of the FEIR the project will comply with the Water Quality Management Plan for the Santa Ana Region of Riverside County (approved by the Santa Ana Regional Water Quality Control Board October 22, 2012), which requires the use of Low Impact Development (LID) BMPs that maximize infiltration, harvest and use, evapotranspiration and/or bio-treatment. Flows from the project will be treated first by LID BMPs where the flow will be infiltrated, evapotranspired, or treated. As required by Mitigation Measure 4.9.6.1A, the treated flows will then be reduced to below or equal to pre-development conditions by routing the on-site storm water flows through a series of on-site detention and infiltration basins before flows are released off site. These basins will provide incidental infiltration and secondary treatment downstream of the LID BMPs. All runoff from the site will be treated by LID BMPs and then routed through the detention and infiltration basins before it leaves the project area and into Mystic Lake and the San Jacinto Wildlife Area. The project will comply with the Nutrient TMDL for Lake Elsinore and Canyon Lake by implementing LID-based BMPs."

Mitigation Measures **4.9.6.3A** and **4.9.6.3B** in the FEIR, treatment BMPs consisting of infiltration, bioretention and low impact development will be implemented. The Water Quality Management Plan complies with the NPDES and TMDL requirements and the project will direct runoff from impervious surfaces into bioretention facilities before the flow is routed to the infiltration/detention basins. The bioretention areas consist of landscaped areas that provide treatment and infiltration. Bioretention facilities will treat the runoff by infiltration, filtration through the soil media, and evapotranspiration. The detention/infiltration basins will provide additional treatment and infiltration after the flow is treated by the bioretention facilities. Note that the detention basins are not being designed as "detention basins with some infiltration capacity", but are being

designed as infiltration basins and detention basins. As noted, the water will be treated by bioretention facilities first as the primary means of treatment, and that the infiltration basins provide an additional level of treatment beyond what is required by the NPDES permit.

Comment III:

WLC Provides No Analysis of the Significant and Inevitable Impacts of Polluted Stormwater Runoff into the San Jacinto Wildlife Area and Wetlands. The WLC project site lies directly in the middle of a sub-watershed that directs water from the Badlands open space area and the 60 freeway through the San Jacinto Wildlife Area, wetlands, and Mystic Lake. The construction of the WLC and conversion of this mostly natural area to impervious surfaces on a scale yet experienced in the United States will influence the water quality in the San Jacinto Wildlife Area and wetlands, as well as other receiving waters. WLC has calculated that the natural flows of the drainage areas will continue. However, by converting the pervious surfaces to impervious and conducting shipping and transportation activities onsite, it is inevitable that the site will discharge more stormwater after construction than it is currently discharging and pollutants will be transported from the site to the San Jacinto Wildlife Area and wetlands, as well as other receiving waters.

With approximately ninety percent of the ephemeral water bodies that once covered huge areas of inland California are now gone, it is especially important that ephemeral water bodies like Mystic Lake protected from pollution and alteration.

The hydraulic conditions of wetlands, such as the San Jacinto Wildlife Area, are strongly influenced by sources and distribution of water. The project may result in the discharge of polluted surface water during operation. Storm water runoff from the roadways, parking lots, and commercial and industrial buildings can carry a variety of pollutants such as sediment, petroleum hydrocarbons, construction materials, landscaping chemicals, nutrients and metals. Releasing contaminated storm water at a controlled rate after a storm event will change the hydrology of downstream areas such as Mystic Lake by providing a more regular flow of water into the ephemeral lake. The FEIR is insufficiently detailed in its description of the type of treatment captured water will undergo, if any, before it is released into Mystic Lake. The FEIR must specify the type of treatment captured storm water will undergo prior to release into Mystic Lake and the San Jacinto Wildlife Area.

WLC provides no analysis of the effects of pollution or extra runoff on the San Jacinto Wildlife Area, wetlands, or ephemeral water bodies like Mystic Lake. The baseline water quality conditions on the project site, especially the southern border that abuts the San Jacinto Wildlife Area, should be established before any development on the project site is approved because a study conducted after the approval of a project “will inevitably have diminished influence on decision making.”²

This is not only a potential significant effect of the project, it is inevitable. Therefore, if WLC does not conduct such an analysis, they would be violating CEQA by not providing the public and relevant agencies with a highly likely significant impact of the project.

Specifically, WLC needs to provide data on the impact of additional stormwater runoff and/or polluted stormwater on the San Jacinto Wildlife Area and wetlands, as well as their proposed mitigation. In addition, WLC needs to explain the monitoring system designed to determine whether additional stormwater runoff or polluted stormwater is discharging to the San Jacinto Wildlife Area. Since WLC proposes to have one of the world’s largest master-planned warehousing complexes drain directly into a protected wildlife area and wetlands, WLC cannot simply claim that their BMPs will never fail. The importance of a clean, natural flow of water to the Wildlife Area and wetlands, combined with the massive scale of the project, necessitates that WLC take steps to ensure that inevitable impact of BMP failure on the Wildlife Area and wetlands is known.

² *Communities for a Better Environment et al., v. City of Richmond, 184 Cal.App.4th 70, 73 (2010). Page 5 of 6.*

Response III:

As stated in Response to Comments I-A, I-B, and II the water will match pre-project conditions and will be treated prior to release downstream. After the bioretention treatment, there is infiltration basins that both treat and conserve stormwater flows, there are also spreading areas that further treat, slow down the flow and release the flow similar to natural conditions. There will be no extra runoff leaving the site as indicated on page 4.9-47 of the FEIR. In addition, WLC has committed to developing and implementing a water quality management plan that test the water quality of the runoff both pre and post project and will implement adaptive management strategies to ensure that water quantity and quality leaving the site mimic pre-project conditions.

DEIR Section 4.9, *Hydrology and Water Quality*, demonstrates that the basins are adequate for detention and infiltration and their result will be to maintain pre-development replenishment of groundwater. This section also demonstrates the basins and BMPs will ensure that the runoff into the SJWA will not exceed pre-development levels in amount, velocity or pollutant loading.

Comment IV:

The Proposed BMPs Will Not Ensure that Groundwater is Adequately Recharged. As noted above, the proposed detention basin system will not be able to infiltrate water at the levels currently seen by the natural site (90%). Although detention basins can infiltrate some water, this is not their purpose. Therefore, unless WLC builds infiltration basins, there will not be groundwater recharge at natural levels. WLC does not provide an analysis of what impacts would occur were they to further deplete groundwater in the area. Given that the project area will undergo a massive increase in impervious surface area, it is overly speculative to assume that the loss of groundwater recharge will be offset by irrigation of the project's drought tolerant landscaped areas.

In light of the serious statewide drought and the arid region of the project site, virtually any groundwater depletion would constitute a significant impact. Therefore, per CEQA, WLC must conduct a groundwater depletion impact analysis. Given the gravity of the water shortage in California and the region, WLC cannot simply claim that its BMP system will always result in full groundwater recharge. Given the potentially very significant impact if the proposed BMPs do not result in full groundwater recharge, WLC must give an analysis of this situation per CEQA.

Response IV:

WLC is implementing infiltration basins. As stated in the comments above the proposed detention basins include infiltration basins and a hydrologic analysis was performed that shows that pre and post project conditions will infiltrate the same amount of water. The groundwater will be recharged to natural levels and will mimic natural conditions. The groundwater analysis was performed and is based on historical runoff and infiltration rates. See the analysis outlined in the Master Plan of Drainage Report.

Comment V:

Detention Basins are Not Habitat Mitigation. In the FEIR, WLC explains that their detention basins will also be used as low-quality habitat mitigation. Detention basins must be scraped clean periodically, and do not provide even low-quality habitat mitigation for impacts to wetlands. In addition, habitat mitigation credit cannot be given for a facility taking measures that they are required to do. The installation of detentions basins is the result of an analysis by the project proponent of the LID prioritization arising out of the County of Riverside's Municipal Separate Storm Sewer System Permit. WLC cannot receive mitigation credit for installing BMPs which are otherwise required and provide marginal habitat benefit, at best.

Response V:

Since this is a programmatic EIR, it will ultimately be up to the resource agencies to determine the actual habitat value of basins planned for actual future development. However, it is anticipated each basin will have a forebay that would be engineered and regularly maintained, plus a central area for detention and infiltration which would have a maintained low flow channel but otherwise it would be sized and designed to allow habitat as well as detention/infiltration which connects to an engineered and maintained outlet. **Mitigation Measures**

4.4.6.1A and B (buffer/basin design), 4.4.6.3A-C (permitting), 4.4.6.4F-K (basin management process) outline various basin design and management requirements for future development.

Comment VI:

Construction Related Water Quality Impacts Will Be Significant. A proposed project of this size and nature in this location will require massive grading and construction likely to threaten downstream water quality. The Environmental Protection Agency has cited sediment-laden runoff from construction projects as one of the most potentially damaging forms of water pollution. Sediment leaving construction sites may deliver toxic chemicals and nutrients into waterways. The threat of increased sedimentation to Mystic Lake must be analyzed in the FEIR. Treatment Control BMPs listed in the FEIR do not include treatment for sediment. Instead, the FEIR relies on the future acquisition of an NPDES permit to address the control of sediment discharges from the project site. This is inadequate, and an assessment of the significant impacts of construction-related polluted runoff is necessary.

Response VI:

As stated in Section 4.9.6.2 on page 4.9-51 of the FEIR the implementation of NPDES permits, including the General Construction permit, ensures that the Federal and State standard for clean water are met. Enforcement of required NPDES permit requirements will prevent sedimentation and soil erosion through implementation of an SWPPP and periodic inspections by RWQCB staff.

As outlined in **Mitigation Measures 4.9.6.2A and 4.9.6.2B**, a stormwater pollution prevention plan that includes treatment control BMPs for sediment will be implemented in accordance with the California Construction General permit. These BMPs are designed to control sediment discharging from the site and include sand bags, silt fences, straw wattles, check dams, fiber rolls and debris basins.

Comment VII:

The Cumulative Impacts of Development in the Region are Not Adequately Addressed in the FEIR. Development within the watershed will result in an increase in impervious surfaces, in addition to changes in land use and associated pollutant runoff characteristics. Increased impervious surfaces are likely to alter existing hydrology and increase potential pollutant loads. The FEIR does not contemplate other reasonably foreseeable future projects that may have direct or indirect impacts on receiving waters and the adjacent San Jacinto Wildlife Area. WLC argues publicly that its proposal will create economic development in the area, and so the potential impacts of this project economic stimulus need to be addressed in the FEIR.

Response VII:

DEIR Section 4.9.7 *Hydrology and Water Quality – Cumulative Impacts*, acknowledges that development of the WLC project and other planned projects in the surrounding areas will add impervious surfaces and may alter existing drainages. However, similar to the proposed WLC project, each development project is required to design and mitigate its own impacts on area hydrology and water quality such that there should be no significant cumulative water quality impacts as long as future development, including warehousing within the WLCSP, meet existing laws and regulations regarding water quality and pollutant discharge limitations. While the cumulative traffic impact analysis did identify a large number of potential development projects in the surrounding area, these are included in and accounted for in the overall growth projection methodology used for the cumulative analysis for most other environmental issues (including hydrology and water quality) as it is not possible to quantify or sum the specific drainage or water quality-related impacts of each project to determine specific cumulative water quality impacts for the region. Rather, a more programmatic approach was used because the WLC EIR is a programmatic document, and subsequent development within the WLCSP will have to evaluate its own specific hydrological and water quality impacts at the time such development is proposed.

Comment VIII:

Conclusion. Waterkeeper supports responsible development and encourages the adoption of a comprehensive FEIR that more specifically addresses how the direct and indirect impacts of the project to the region's water quality, wildlife areas and wetlands will be mitigated.

Response VIII:

The FEIR does demonstrate that it has addressed both direct and indirect impacts of the proposed WLC project regarding hydrology, water quality, and biological resources to the degree possible in this programmatic document. Subsequent development within the WLCSP will have to evaluate its own specific hydrological, water quality, and biological impacts at the time such development is proposed, and will have to mitigate those impacts consistent with the programmatic measures outlined in the WLC EIR.

RESPONSE SUMMARY: The conclusions contained in the FEIR regarding hydrology and water quality are based upon the project-specific hydrology and water quality reports prepared in compliance with City and County guidelines. These issues were analyzed in detail in EIR Section 4.9, *Hydrology and Water Quality*, which determined programmatic impacts and cumulative impacts would be less than significant with implementation of project specific mitigation and design requirements on future development, both within and outside of the WLC Specific Plan (i.e., for cumulative impacts).

In addition, the conclusions contained in the FEIR regarding biological resources are based upon a number of project-specific biological studies. EIR Section 4.4, *Biological Resources*, determined that programmatic impacts and cumulative impacts on biological resources would be less than significant with implementation of project specific mitigation on future development as outlined in the Multiple Species Habitat Conservation Plan for Western Riverside County (i.e., for cumulative impacts).

MEMORANDUM

DATE: June 23, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to Letter from Lozeau Drury (LIUNA Union) dated June 10, 2015**

In a letter dated June 10, 2015, Richard Drury with the law firm of Lozeau Drury representing the LIUNA union submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

Comment 1:

I am writing on behalf of Laborers International Union of North America, Local Union No. 1184 and its members living in Riverside County (collectively "LIUNA Local Union No. 1184" or "LIUNA" or "Commenters") regarding the Final Environmental Impact Report ("DEIR") prepared for the World Logistics Center Project, State Clearinghouse No. 2012021045 ("Project"). We have submitted detailed comments on the Draft EIR for the Project, which comments are incorporated herein by reference in their entirety.

We have reviewed the DEIR with the assistance of:

- 1. Traffic Engineer Tom Brohard, P.E.*
- 2. Hydrogeologist, Matthew Hagemann, C.Hg., MS.*
- 3. Biologist, Dr. Shawn Smallwood, Ph.D.*
- 4. Agricultural Consultant, Gregory A. House.*

These experts have prepared written comments that are attached hereto, and which are incorporated in their entirety. The City of Moreno Valley ("City") should respond to the expert comments separately. These experts and our own independent review demonstrate that the FEIR is woefully inadequate and that a new supplemental EIR is required to be prepared and recirculated for public comment. Commenters urge the City to revise the EIR to adequately describe, analyze, and mitigate the Project and its impacts. The revised EIR should be recirculated to allow public review and comment.

Response 1:

Responses have been prepared for the comments contained in this letter and attachments. They show that recirculation is not required.

Comment 2:

I. PROJECT DESCRIPTION

The Project site encompasses 3,918 acres of land located in Rancho Belago, the eastern portion of the City of Moreno Valley, and is situated directly south of State Route 60 (SR-60) with the Badlands area to the east and northeast, the Mount Russell Range to the southwest, and Mystic Lake and the San Jacinto wildlife Area to the southeast. (DEIR, p. 3-19.)

The Specific Plan being evaluated in this EIR covers 2,610 acres and proposes a maximum of 40.4 million square feet of "high-cube logistics" warehouse distribution uses classified as "Logistics Development" (LD) and 200,000 square feet (approximately 0.5%) of warehousing-related uses classified as "Light Logistics" (LL).

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The lands within the WLC Specific Plan that are designated LL are existing rural lots, some containing residential uses, that will become “legal, non-conforming uses” once the WLC Specific Plan is approved. In addition, the LD designation includes land for two special use areas; a fire station and a “logistics support” facility for vehicle fueling and sale of convenience goods (3,000 square feet is assumed for planning purposes for the “logistics support”). (FEIR, p. 3-19).

The Project site primarily consists of active farmland. (DEIR, pp.3-1, 3-2.) Approximately 3,389 acres, or 89 percent of the 3,814-acre project area, are designated as Farmland of Local Importance and approximately 25 acres are designated as Unique Farmland. (DEIR, p. 4.2-7.) The site is also scattered with seven residences. (DEIR, p. 3-2.)

Response 2:

The project area has been revised in response to comment to remove 100 acres, resulting in 3,818 acres, including 104 acres in off-site improvements, as described at FEIR, 3-1.

Comment 3:

Standing. Hundreds of members of Local Union No. 1184 live, work, and recreate in the immediate vicinity of the Project site. These members will suffer the impacts of a poorly executed or inadequately mitigated Project, just as would the members of any nearby homeowners association, community group, or environmental group. Hundreds of LIUNA Local Union No. 1184 members live and work in areas that will be affected by traffic, air pollution, and water pollution generated by the Project. In addition, construction workers will suffer many of the most significant impacts from the Project as currently proposed, such as from air pollution emissions from poorly maintained or controlled construction equipment, possible risks related to hazardous materials on the Project site, and other impacts. Therefore, LIUNA Local Union No. 1184 and its members have a direct interest in ensuring that the Project is adequately analyzed and that its environmental and public health impacts are mitigated to the fullest extent feasible.

Response 3:

It is not up to the CEQA document or local process to determine or rule on standing, that determination is for a judge to make as part of the CEQA litigation process. Potential impacts that the commenter refers to as possibly affecting LIUNA members could also affect the public and thus have already been addressed in the EIR.

Comment 4:

*Legal Standards – FEIR. The lead agency must evaluate comments on the draft EIR and prepare written responses in the final EIR. (PRC §21091(d)) The FEIR must include a “detailed” written response to all “significant environmental issues” raised by commenters. As the court stated in *City of Long Beach v. LA USD* (2009) 176 Cal.App.4th 889, 904:*

The requirement of a detailed written response to comments helps to ensure that the lead agency will fully consider the environmental consequences of a decision before it is made, that the decision is well informed and open to public scrutiny, and that public participation in the environmental review process is meaningful.

*The FEIR’s responses to comments must be detailed and must provide a reasoned, good faith analysis. (14 CCR §15088(c)). Failure to provide a substantive response to comments renders the EIR legally inadequate. (*Rural Land Owners Assoc. v. City Council* (1983) 143 Cal.App.3d 1013, 1020). The responses to comments on a draft EIR must state reasons for rejecting suggested mitigation measures and comments on significant environmental issues. “Conclusory statements unsupported by factual information” are not an adequate response. (14 CCR §15088(b, c); *Cleary v. County of Stanislaus* (1981) 118 Cal.App.3rd 348). The need for substantive, detailed response is particularly appropriate when comments have been raised by experts or other agencies. (*Berkeley Keep Jets v. Bd. of Port Comm’rs* (2001) 91 Cal.App.4th 1344, 1367; *People v. Kern* (1976) 72 Cal.app.3d 761). A reasoned analysis of the issue and references to supporting evidence are required for substantive comments raised. (*Calif. Oak Found. v. Santa Clarita* (2005) 133 Cal.App.4th 1219).*

The FEIR abjectly fails to meet these legal standards, as it is riddled with conclusory statements lacking any factual support or analysis.

Response 4:

The comment above describes requirements of CEQA in regard to response to comments and recirculation. The FEIR for the WLC project meets the requirements of CEQA in regard to response to comments. The FEIR provides detailed responses to all comments received (see FEIR Volume 1). The FEIR is neither inadequate nor conclusory.

Comment 5:

Legal Standards – Supplemental EIR. Recirculation of an EIR prior to certification is required “when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented (cf. CEQA Guidelines, § 15162, subd. (a)(1), (3)(B)(1)); (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance (cf. CEQA Guidelines, § 15162, subd. (a)(3)(B)(2)); (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project’s proponents decline to adopt (cf. CEQA Guidelines, § 15162, subd. (a)(3)(B)(3), (4)); or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless.” (Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal. 4th 1112, 1130, citing Mountain Lion Coalition v. Fish & Game Comm’n (1989) 214 Cal.App.3d 1043.) Significant new information requiring recirculation can include:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.*
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines, § 15088.5(a).)*

The FEIR fails to analyze significant environmental impacts pertaining to the Project and to fully consider available mitigation measures to address those impacts. A revised EIR is required to be prepared and recirculated to address these deficiencies.

Response 5:

CEQA Guidelines Section 15088.5 states that “new information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect”. The impacts described in the FEIR are similar to or less than the impacts described in the DEIR. New, though not significant, information added to the document responds to comments; merely clarifies or amplifies existing information; or adds new mitigation measures, any impacts of which have been fully evaluated in the FEIR. In addition, FEIR is neither inadequate nor conclusory.

Comments 6:

THE FINAL EIR FAILS ADEQUATELY TO DISCLOSE AND MITIGATE SIGNIFICANT PROJECT IMPACTS. A. THE PROJECT WILL HAVE MASSIVE TRAFFIC IMPACTS THAT HAVE NOT BEEN ADEQUATELY MITIGATED. Traffic Engineer Tom Brohard, PE, has submitted comments concluding that the Project will have massive and significant traffic impacts that have not been adequately mitigated. A new EIR is required to analyze these impacts and propose all feasible mitigation measures. (Brohard Comments, Exhibit A). The Project will generate 69,542 daily trips, with 4590 trips in the AM peak hour and 5010 trips in the PM peak

hour. This will double the existing AM and PM peak hour traffic on SR60, creating 60 direct traffic impacts and 205 cumulative traffic impacts. (Brohard Comment, p.1-2). Nevertheless, the FEIR fails to include adequate or enforceable traffic mitigation measures and fails to disclose several direct traffic impacts. Traffic Engineer Brohard identifies 18 direct traffic impacts of the Project that are not identified in the EIR or its traffic study. Direct traffic impacts are when the Project alone causes an intersection or road segment to fall below the acceptable Level of Service (LOS). Mr. Brohard identified 18 direct traffic impacts that are either ignored entirely or identified improperly as cumulative impacts. This is a significant omission since a Project must fully mitigate all of its direct traffic impacts, while it need only contribute a “fair share” to mitigate cumulative impacts. Thus, by failing to identify these impacts properly, the EIR fails to ensure adequate mitigation.

Mr. Brohard identified the following direct traffic impacts that are not identified in the EIR:

1. Eastbound SR-60 from Euclid to Grove. Degrades from LOS D to LOS E in AM peak hour;
2. Eastbound SR-91 from Central to 14th St. Degrades from LOS D to LOS E in AM Peak hour;
3. Cactus Ave from Redlands Blvd. to Cactus Ave Extension – Degrades from LOS A to LOS E;
4. Gilman Springs Rd/Bridge Street – Degrades from LOS C to LOS D in PM Peak hour;
5. San Timoteo Canyon Rd./Alessandro Rd. – Degrades from LOS C to LOS F in PM peak hour.
6. Eastbound SR-60 from Euclid to Grove – Degrades from LOS D to LOS E in AM peak hour;
7. Eastbound SR-60 from Central to Fair Isle Drive/Box Springs Rd. – Degrades from LOS D to LOS E.
8. Gilman Springs Rd/Bridge St. – Degrades from LOS C to LOS D;
9. Eastbound SR-60 from Pigeon Pass Rd/Fredrick St. to Heacock St. – Degrades from LOS D to LOS E in AM peak hour;
10. Eastbound SR-60 from Heacock to Perris Blvd. – Degrades from LOS C to LOS E in AM peak hour.
11. SR-60 Eastbound on-ramp from Cetnral Ave. – Degrades from LOS D to LOS F.
12. Gilman Springs Rd. from Alesandro to Bridge St. – Degrades from LOS D to LOS F.
13. Lasselle St/Cactus Ave – Degrades from LOS C to LOS D in PM peak hour.
14. Central Ave/Chicago Ave – Degrades from LOS D to LOS E in AM peak hour.
15. Westbound SR-60 from Reservoir St. to Ramona Ave. – Degrades from LOS D to LOS E.
16. Westbound SR-60 from Redlands Blvd. to Theodore St. – Degrades from LOS D to LOS E in PM peak hour.
17. Eastbound SR-60 from Main St. to SR-91 – Degrades from LOS D to LOS E.
18. SR-60 Eastbound on-ramp from Theodore St. – Degrades to LOS F in PM peak hour.

Response 6:

Caltrans TIA guidelines (attached, see page 2) are vague both on the topic of when a facility needs to be studied and also what exactly constitutes a study. This sometimes results in comments on EIRs that adding even one trip to a freeway automatically triggers a full-blown traffic analysis. Clearly that is not the case as any number of traffic studies have been approved and upheld in court that did not do detailed analysis of every freeway near the project site. It should also be noted that Caltrans’ guidelines are in the process of being revised in part to help eliminate this type of problem with traffic studies.

The existing guidelines make it clear that engineering judgment is to be exercised in determining how a TIA is to proceed. The section opens with the sentence, “The following criterion is a starting point in determining when a TIS is needed” and closes with, “The appropriate level of study is determined by the particulars of a project, the prevailing highway conditions, and the forecasted traffic” (emphasis added). So the assertion that there is a hard-and-fast rule on this is incorrect. The system is set up to enable Caltrans, as responsible for the state highway system, to work with the lead agency to determine the appropriate scope of study depending on the technical aspects of each individual project. In the case of the WLC project, this was accomplished in a series of meetings, emails, and telephone conversions culminating in a technical memorandum (attached) in which the traffic consultant described in detail how the forecasting would be done and how the traffic volumes would be analyzed and in the subsequent Caltrans letter (attached) concurring with the proposed methodology.

Please note that the approved methodology clearly states (see “Facilities to be Studied” on page 6) that the freeway analysis will be done on segments to which 100 or more peak-hour trips are added.

The comment states that, “*Therefore the number of project trips generated on the section of the I-215 Freeway between the SR-60 Freeway and Perris Boulevard should be determined/shown in the TIA report and the appropriate analysis conducted based on Caltrans requirements ...*” (emphasis added) which is what was done in this case. The remainder of the commenter’s sentence, “... *which at a minimum would include the existing LOS on this freeway mainline section*” is incorrect. Caltrans has determined its requirements and this was not included in them.

It should also be noted that the City of Riverside’s TIA guidelines require roadway segment analysis for General Plan Amendments (GPA), Specific Plans (SP) or Specific Plan Amendments (SPA) in the City of Riverside. This fulfills a specific requirement in the California Government Code Section 65302(b)(1) that a City’s General Plan include, “*A circulation element consisting of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, any military airports and ports, and other local public utilities and facilities, all correlated with the land use element of the plan.*” The TIA requirement is merely intended to ensure that when City of Riverside GPAs, SPs, or SPAs are processed someone checks to make sure that the City of Riverside circulation element is concurrently updated so that the different elements of the General Plan remain correlated. This was not intended to be and is not a general requirement that GPAs, SPs, and SPAs taking place in other jurisdictions in southern California trigger the need to analyze City of Riverside roadway segments.

Comment 7:

Since the FEIR fails to disclose the impacts above to be direct impacts of the Project, it does not adequately mitigate the impacts. Instead, the EIR relies on “fair share” contributions to unspecified mitigation programs that may or may not ever be implemented. This approach is legally inadequate since the EIR must require a Project to fully mitigate all of its direct impacts. A new EIR is required to disclose all of the above as direct impacts, and to propose that the Project fund and implement fully all feasible mitigation measures to reduce those impacts.

Response 7:

The comment is incorrect. Whether direct or cumulative, all transportation-related impacts are identified in FEIR Section 4.15 and the TIA. The mitigation measures require an updated transportation analysis with every plot plan. Any impacts must be mitigated as a condition of approval. For any impacts within the jurisdiction of the City, the mitigation must be implemented. Since impacts outside the City are outside the City’s ability to control implementation, the FEIR concludes that the impacts remain significant and unavoidable. Nonetheless, the mitigation measures require the payment of fair share contribution to impacts for mitigation outside the jurisdiction as they are identified outside the City. See MM 4.15.7.4A through 4.15.7.4G. So, regardless of the type or location of impacts, the mitigation measures ensure that are impacts all fully addressed.

Comment 8:

The EIR improperly relies on deferred mitigation measures. Mitigation Measure 4.15.7.4G states, “City shall work directly with Western Riverside Council of Governments to request that Transportation Uniform Mitigation Fee funding priorities be shifted to align with the needs of the City, including improvements identified in the World Logistics Center Specific Plan traffic impact analysis. Toward this end, City shall meet regularly with Western Riverside Council of Governments.” This is plainly deferred mitigation that will be developed (or not) after Project approval. CEQA prohibits such deferred mitigation since there is no way to determine if the mitigation will be adequate, or if it will ever be implemented at all.

Response 8:

The mitigation measure identified in the comment does not impact any of the findings of the TIA or FEIR Section 4.15. This mitigation measure only places upon the City the requirement to coordinate with the agency

that will oversee regional mitigation funding in the City. Since ultimate actions are outside the City's control, any improvements that WRCOG would be responsible remain significant and unavoidable. Where mitigation is within the City's control, mitigation must be implemented as condition of subsequent project approval as described in MM 4.15.7.4A.

Comment 9:

Feasible mitigation measures for significant environmental effects must be set forth in an EIR for consideration by the lead agency's decision makers and the public before certification of the EIR and approval of a project. The formulation of mitigation measures generally cannot be deferred until after certification of the EIR and approval of a project. Guidelines, section 15126.4(a)(1)(B) states: "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. "[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking; and[,] consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." (Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 92.) The Findings and EIR are replete with such deferred mitigation. A supplemental EIR is required to clearly define mitigation measures in a manner that can be analyzed and reviewed by the public and governmental decision makers.

Response 9:

All of the FEIR's mitigation measures are based on defined performance measures that outline what impacts are to be addressed and how the mitigation measure will be implemented. The Transportation mitigation measures are an example of the detailed measures contained in the FEIR that establish a defined process, based upon the analysis contained in this programmatic FEIR and supplemented with subsequent environmental review when specific projects are brought forward under the WLC Specific Plan.

Comment 10:

The EIR also improperly relies on fee-based mitigation without defining mitigation measures or ensuring that specific adequate measures will ever be implemented. CEQA prohibits this approach. Mitigation fees are not adequate mitigation unless the lead agency can show that the fees will fund a specific mitigation plan that will actually be implemented in its entirety. (Napa Citizens for Honest Gov. v. Bd. Of Supervisors (2001) 91 Cal.App.4th 342 (no evidence that impacts will be mitigated simply by paying a fee); Anderson First Coal. v. City of Anderson (2005) 130 Ca.App.4th 1173 (traffic mitigation fee is inadequate because it does not ensure that mitigation measure will actually be implemented).

Response 10:

All the mitigation fees identified in the FEIR are for programs that have established records in mitigating impacts. Examples of such mitigation fees are TUMF for transportation-related impacts and the MSHCP mitigation fee for wildlife mitigation. The commenter does not identify which mitigation fees in the FEIR fail to fund a specific mitigation plan. The FEIR recognizes that fees paid for the improvements outside of the City's control may not result in the construction of the improvements. It therefore concludes that impacts to improvements outside of the City's control are significant and unavoidable (FEIR Volume 3, Revised Draft EIR, Table 4.15.BB).

Comment 11:

THE PROJECT WILL HAVE SIGNIFICANT AIR QUALITY IMPACTS THAT HAVE NOT BEEN DISCLOSED IN THE FEIR AND HAVE NOT BEEN ADEQUATELY MITIGATED. The Final EIR is so patently deficient in the area of air quality, that the California Air Resources Board (CARB) has taken the highly unusual step of filing a formal comment letter criticizing the FEIR and requesting preparation of a supplemental EIR to remedy the obvious defects. (See CARB Comment letter dated June 8, 2015 (Exhibit. B). CARB points out that the FEIR dismisses health impacts of diesel particulate matter (DPM) based on a single recent study, the Advanced

Collaborative Emissions Study (ACES). The FEIR repeatedly references that the ACES study concludes that the “application of new emissions control technology to diesel engines have virtually eliminated the health impacts of diesel exhaust.” CARB states:

“First, the use of only one study as the basis for this analysis is not sufficient for the purpose of providing a comprehensive analysis of health risk from project construction and operations. The ACES study is only one of many scientific studies related to health risk and emissions, and therefore, cannot serve as substantial evidence regarding the project impact to human health. In fact, there are many other studies that conclude that diesel particulate matter (PM) is a health hazard. For example, the International Agency for Research on Cancer evaluated the scientific literature as a whole and concluded in 2012 that diesel PM is carcinogenic to humans (class 1). Second, and more importantly, the ACES study’s methodology and findings render it inadequate for inclusion in an environmental document, and cannot serve as substantial evidence supporting a finding that the project will not result in significant cancer risk impacts. Therefore, use of and reference to the ACES study should be removed throughout the FEIR.”

CARB points out the DPM is listed as a known human carcinogen by the California Office of Environmental Health Hazard Assessment (OEHHA). The EIR cannot simply ignore the legal conclusions of CARB and OEHHA, the California agencies with regulatory authority over the issue of airborne carcinogens. Yet the Final EIR does exactly this, based on a single study conducted on rats.

Response 11:

See response to CARB comment letter.

Comment 12:

Matthew Hagemann, C.Hg., and environmental scientist Jessie Jaeger of the consulting firm SWAPE point out this same defect. (SWAPE Comment Letter p.2 (Exhibit C)). Mr. Hagemann concludes that using standard California risk assessment methodology, the Project will have significant cancer impacts from DPM on nearby residences above the SCAQMD CEQA significance thresholds. Mr. Hagemann calculated cancer risk of 15.7 per million, well above the 10 per million CEQA significance threshold set by SCAQMD. SCAQMD requires the use of the CARB risk assessment methodologies, not the ACES study.

When a regulatory agency with appropriate jurisdiction (such as CARB) has adopted a CEQA significance threshold and methodology for calculating an impact, the lead agency must apply that duly adopted methodology. Comtys. for a Better Env’t v. So. Coast Air Quality Mgmt. Dist. (2010) 48 Cal.4th 310, 327 (impact is significant because it exceeds “established significance threshold for NOx ... constitute[ing] substantial evidence supporting a fair argument for a significant adverse impact”); Lotus v. Dep’t of Transportation (2014) 223 Cal. App. 4th 645, 652; Endangered Habitats League, Inc. v. County of Orange (2005) 131 Cal.App.4th 777, 783-4). The EIR essentially ignores CARB’s and OEHHA’s official findings that DPM is a known human carcinogen, relying on the recent ACES report conducted on a small number of rats.

This ignores decades of scientific research finding that DPM is a potent human carcinogen, and ignores all relevant regulatory agencies. Since the ACES study conflicts with duly adopted CEQA thresholds, it is entitled to no deference and does not constitute substantial evidence. “A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” (Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs. (2001) 91 Cal. App. 4th 1344, 1355). CEQA does not allow such an approach. A supplemental EIR is required to properly calculate and disclose this impact under California law, using duly adopted California health risk assessment methodology – not the unapproved ACES study. Once disclosed, the EIR must propose all feasible mitigation measures. Mr. Hagemann points out that feasible mitigation should include installation of Minimum Efficiency Reporting Value (MERV) filters rated at 13 or above at all residential units where incremental cancer risks exceed one in one hundred thousand (FEIR Volume I, p. 665-666).

Response 12:

See response to CARB comment letter. In addition, it should be noted that FEIR contains a complete analysis of the project's impacts using the methodology requested by the commenter (FEIR Volume 3, Section 4.3.6.5, Impacts to Sensitive Receptors). As the commenter notes, there are no impacts outside the project boundaries and only three homes within the project boundaries have impacts that would exceed the significance threshold. However, as discussed in the FEIR Section 4.3 and in response to the CARB comment letter, none of the studies upon which the OEHHA methodology is based have evaluated the health impacts of new technology diesel engines such as those required by this project. The HEI ACES is the first study to do so. Based on the conclusions of that study, as described in FEIR Section 4.3.6.5, a less than significant impact for increased cancer risk would be expected to those homes within the project boundaries.

As a final note, while the FEIR concluded that a less than significant impact for increased cancer risk would occur, as part of the development agreement between the developer and the City, the developer is required to outfit the three homes identified as exceeding the OEHHA-based risk calculation with MERV-13 air filters.

Comment 13:

CARB concludes that feasible mitigation should include a requirement of zero emission and near-zero-emission vehicles at the Project where feasible. (CARB Comment Letter, p. 4). Since the FEIR dismissed this impact using spurious, unapproved calculation methods, the FEIR also failed to require implementation of these and all other feasible mitigation measures.

Response 13:

See response to CARB comment letter.

Comment 14:

THE PROJECT WILL HAVE SIGNIFICANT BIOLOGICAL IMPACTS THAT HAVE NOT BEEN ADEQUATELY DISCLOSED OR MITIGATED. *Dr. Shawn Smallwood points out that the Project will have numerous biological impacts on special status species in the area that have not been disclosed or mitigated in the Final EIR. (Smallwood Comment Ltr. (Exhibit D)). Dr. Smallwood concludes that the Project will have significant impacts on burrowing owls, and that the surveys done for the Project were conducted using an improper, unscientific and biased method that would fail to identify burrowing owls on site. For example, the burrowing owl survey performed for the FEIR states, "Burrowing owls are crepuscular owls, being most active during the early morning or evening hours." Dr. Smallwood points out, "In fact, burrowing owls are most active at night. Burrowing owl surveys should be performed on the project site by professionals with more experience with burrowing owls, and the surveys should follow the guidelines of CBOC 2013 and CDFG (2012)." The EIR consultant, FirstCarbon, appears to be wholly unqualified to conduct burrowing owl surveys since they are unfamiliar even with the times that burrowing owls are active. This study is therefore entitled to no deference since it is unscientific. "A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" (Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs. (2001) 91 Cal. App. 4th 1344, 1355, quoting, Laurel Heights Improvement Assn. v. Regents of University of California, 47 Cal. 3d 376, 391 409, fn. 12 (1988)).*

Response 14:

Burrowing owl surveys were conducted in 2005, 2006, 2010, 2012 and 2013 on various portions of the project site. Surveys were conducted under the MSHCP protocol. Burrowing owls were observed in the 2005 and 2013 surveys. Due to the observations over time in various portions of the site, Mitigation Measure 4.4.6 4D, which requires the preparation of a 30-day pre-construction survey shall be conducted prior to any grading activities, has been incorporated into the MMRP. The FCS Biologist who conducted the most recent surveys has over twenty years of technical experience conducting surveys in Southern California including the Inland Empire.

All of the surveys for plant or animal species on the project site were conducted according to established protocols issued by resource agencies and conducted by qualified and experienced biologists. As described in FEIR Appendix E-5, Section 2.2.1, protocol surveys of burrowing owls involve inspecting rodent burrows, which are used as dens by burrowing owls. Their presence is inferred from markers that the owls leave behind. It would be of little use to inspect the dens at night, when the owls are active and, therefore, not unlikely to be in their dens and the limited visibility would obscure other indications of their presence.

Comment 15:

Dr. Smallwood also concludes that the Project will have significant impacts on wildlife movement, contrary to the EIR. Dr. Smallwood states: According to the FEIR (1-38), the project will not restrict the movement of wildlife between the Badlands and the SWAN and Mystic Lake areas. This conclusion was incorrect. Constructing several thousands of acres of warehouses and trucking infrastructure between the Badlands and Mount Russell will most definitely restrict wildlife movement across the valley (Figure 1). Animal species that have for thousands of years been capable of crossing the valley between the Badlands and Mount Russell will no longer be able to do so. The Mount Russell range will be isolated from the Badlands for the first time, and so the project's impacts will fragment habitat in the region.

Response 15:

The project area is located within the Reche Canyon/Badlands Area Plan of the MSHCP and falls within both the Badlands North Area Plan Subunit and the SJWA/Mystic Lake Area Plan Subunit. The open agricultural fields that occupy much of the project area are not designated as corridors or linkages in the MSHCP. Existing linkages are located east of Gilman Springs Road and south of the project site in vicinity of Mystic Lake.

FEIR Section 4.4.1.14.g identifies the reasons why there will not be a significant impact on wildlife movement. Further analysis describing why the project area does not serve as a meaningful wildlife corridor is contained in the analysis found in FEIR Section 4.4.5.2. Existing site conditions, such as the presence of SR-60 to the north and the active agricultural uses of property limit the ability of wildlife to use the project area as a corridor. Dr. Smallwood contends that removal of a potential path constitutes a significant restriction on wildlife movement. This is incorrect. The analysis relies on identified corridors in the MSHCP that wildlife uses and analyzes examines how the project area is used as a wildlife corridor. It is this basis that the FEIR relies upon to draw its conclusions.

Comment 16:

(letter contained Figure 1). Likely movement trajectories of wildlife across the project area (red boundary), including avian flights along the valley (blue arrows) and avian and terrestrial wildlife movements between the Badlands and Mount Russell and Lake Perris (yellow arrows). Dr. Smallwood concludes that the Project will have significant cumulative impacts on habitat loss when considered together with large industrial scale solar photovoltaic and wind projects being constructed in the area. The FEIR fails to consider these cumulative impacts.

Dr. Smallwood concludes that as a mitigation measure, the EIR should require all 2000 acres of rooftops on the Project be covered with solar panels. While the EIR currently requires solar panels sufficient to offset energy use by the office space in the Project itself, this leaves much of the rooftop area open for further solar development. Covering all 2000 acres of rooftops with solar panels would generate 282 megawatts of electricity. (Smallwood Comment, p. 8). This would offset the need to construct additional solar panels on habitat in the area. It would also help to offset air quality impacts from DPM and nitrogen oxides (NOx) discussed by CARB and SWAPE.

Response 16:

The comment concludes that the EIR should require all 2,000 acres of rooftops be covered with solar panels. As previously discussed, the cumulative impacts of the project are less than significant. More importantly, the

project itself will not have a significant impact to wildlife or habitat. Since there are no significant impacts to biological resources, there is no need to require solar power to the entire project site.

The cumulative impacts of the project are less than significant for a number of factors. Most importantly, the project itself will not have a significant impact wildlife or habitat. Since the project area covers regularly disked farmland that reduces its habitat quality, the effects of the project are limited. The project is also not expected to impact the habitat in surrounding areas. Finally, the projects that Dr. Smallwood identified as contributing to cumulative impacts are so far removed, not even occurring within Riverside County – with most near the Mexican border, that the less than significant effect of the project will not cumulatively contribute to significant wildlife or habitat impacts. As a result, there is no need to increase the amount of solar power already incorporated into the project to reduce impacts. In addition, there is no evidence that incorporating such solar into the project would reduce demand for other solar projects in Imperial County cited by the commenter.

Comment 17:

THE PROJECT WILL HAVE SIGNIFICANT AGRICULTURAL IMPACTS THAT ARE NEITHER DISCLOSED NOR MITIGATED IN THE EIR. *The Project would result in the conversion to non-agricultural use of 2,201 acres of land designated as Farmland of Local Significance within the Specific Plan area, as well as 25 acres of Unique Farmland. The FEIR and findings conclude that the conversion of the 2201 acres of Farmland of Local Significance is a less than significant impact, and proposes to mitigate only the loss of 25 acres of Unique Farmland. (Proposed Findings, p. 73). Agricultural consultant Gregory House concludes that the Project will have significant agricultural impacts, contrary to the conclusion of the FEIR. (House Comment letter, Exhibit E). The FEIR concludes that the Land Evaluation and Site Assessment Score (LESA) is 60.4. This indicates a significant impact to agriculture. However, the Parsons-Brinckerhoff study concludes that since the Site Assessment portion of the cumulative score is less than 20 – 19.5 – the Project does not have a significant impacts on agriculture.*

Mr. House calculates that the Site Assessment score was improperly calculated. In particular, the Parsons-Brinckerhoff study concluded that citrus farming is no longer economically viable on the site because the price of water would allegedly be greater than the value of the citrus produced. However, Mr. House notes that recycled water is available in sufficient quantities from the Eastern Municipal Water District (EMWD). Mr. House notes that contrary to the conclusion of the EIR, this water is adequate for citrus irrigation. Mr. House also calculates that the recycled water could be used in sufficient quantities to irrigate mandarins and lemons and that those citrus crops could be produced at a significant profit of about \$2400 to \$4000 per acre. (House Comment Letter, p.3).

Taking these facts into consideration, the Site Assessment portion of the LESA score increases to between 20.1 to 22 – above the 20 threshold. This means that the Project has a significant impact on agricultural resources that must be disclosed in the EIR. The EIR is deficient for failing to disclose this impact. This also means that the EIR must propose all feasible mitigation measures to reduce the impact to agriculture. Typical mitigation would be a requirement to create agricultural offsets at, at least, a 1:1 ratio for the entire 2200 acres of lost agricultural land – not just 25 acres. Mira Mar Mobile Community v. City of Oceanside (4th Dist. 2004) 119 Cal. App. 4th 477.

Response 17:

The assessment by Mr. House fails to acknowledge several factors related to the significance conclusion for agricultural resources. First, the conclusions of the LESA model are based upon multiple factors, not just water availability. Second, the most important factor contributing to a significant impact on agricultural resources is the type and amount of underlying soils. Finally, the original DEIR did conclude potential impacts were significant but a large contributor to that was the inclusion of the CDFG Conservation Buffer Area (currently used for dry farming) in the area calculation for the WLC project site. As stated in the Parsons Brinckerhoff report, “Based on Table 3, it was determined that irrigated production is feasible during non-drought years, but there would be physical and economic restrictions to agricultural production and unavailable during drought

years (MBA 2008).” (FEIR, Appendix C-2, p. A-3). This led to the selection of Option 11 from Table 3 and, ultimately, to the conclusion that the LESA score results in a less than significant impact.

It should be noted that a comment on the Draft EIR pointed out the fact that the CDFG property was not under the Specific Plan and so should not be included in the calculation of impacts for onsite loss of agriculture (i.e. on the WLC Specific Plan property). When the CDFG property was removed from the calculation, potential impacts from loss of agriculture were no longer significant. This conclusion was supported by the various reports in the agricultural appendices to the DEIR (FEIR Volume 2 Appendix C).

Finally, reclaimed wastewater is not currently available to the project site, but Mitigation Measures 4.16.1.6.1A and 4.16.1.6.1B require future development to consider use of reclaimed water for landscape irrigation if it is economically available in the future (FEIR Volume 3, pages 4.16-20 and -21). Even if reclaimed water becomes available from a logistical or economic perspective, the regional water quality control board may not allow either local groundwater or reclaimed water to be used to irrigate crops in this area due to historical concerns about high levels of nitrates and total dissolved salts.

Comment 18:

THE EIR FAILS TO ANALYZE URBAN DECAY IMPACTS. The Final EIR contains a two-sentence “section” on urban decay. (FEIR p. 5-7). While this section references another section of the FEIR, 4.13, that section contains no substantive analysis of urban decay at all. A supplemental EIR is required to analyze the urban decay impacts of the Project and to propose feasible mitigation measures.

Placing 40 million square feet of warehouse space in the city, together with massive amounts of traffic snarling, diesel engine exhaust above cancer thresholds, nitrogen oxide pollution, and other impacts may surely cause urban decay. The EIR fails to analyze this impact entirely – other than a two-sentence statement. It is well established that an EIR must analyze urban decay impacts of a Project. Yet, the DEIR and FEIR are virtually silent on the potentially significant impacts related to urban decay or blight. The approval and construction of the Project clearly could result in significant impacts regarding the creation of urban decay or deterioration in the area. Yet, this impact is not addressed in the EIR. Consideration of this topic in environmental documents prepared under CEQA has increased over the recent years in direct response to the California Appeals Court Decision (December 2004) in Bakersfield Citizens for Local Control v. City of Bakersfield. In that decision, the Court determined that CEQA Guidelines Section 15054 requires such research and analysis, “when the economic or social effects of a project cause physical change, this change is regarded as a significant effect in the same manner as any other physical change resulting from the project.” In addition, in the Anderson First Coalition v. City of Anderson (June 2005), the Court found that social or economic changes that may have a physical impact should be considered in an EIR. While such EIR analyses are most often associated with big box or retail complexes that have the potential to result in urban decay by redirecting sales from existing businesses, urban decay impacts can also occur as a result of uses that present a nuisance thereby impacting other land uses in an area or as a result of uses that result in an area no longer being viable for existing or planned land uses as may well be the case here.

In Bakersfield Citizens for Local Control v. City of Bakersfield (2004) (124 Cal.App.4th 1184) (Bakersfield Citizens), the court expressly held that an EIR must analyze a project’s potential to cause urban decay if there is substantial evidence showing that the project may lead to such impacts. The court pointed out that CEQA requires the project proponent to discuss the project’s economic and social impacts where “[a]n EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic and social changes.” (CEQA Guidelines §§ 15131(a) and 15064(f).) Bakersfield Citizens concerned a proposal to construct two WalMart Stores within 3 miles of each other. Evidence was submitted that the stores could cause urban decay by forcing local downtown stores to close. The court held that this impact must be analyzed in the EIR. Most of the cases cited by the Bakersfield Citizens court concerned other retail developments with alleged urban decay impacts. (See, Citizens Assoc. for Sensible Dev. of Bishop Area v. County of Inyo (1985) 172 Cal.App.3d 151,

170 171 (shopping mall threatens downtown businesses and urban decay); *Citizens for Quality Growth v. City of Mt. Shasta* (1988) 198 Cal.App.3d 433, 445-446 (shopping mall may cause “business closures” in downtown area); *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1019 (insufficient evidence that Borders bookstore may threaten local bookstores); see also, *Anderson First Coalition v. City of Anderson* (2005) 30 Cal.Rptr.3d 738 (shopping center); *American Canyon Community United for Responsible Growth v. City of American Canyon* (2006) 145 Cal.App.4th 1062, 1074 (urban decay impacts of supercenter must be analyzed); *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal.App.4th 911, 920 (EIR adequately analyzed urban decay impacts of supercenter.)

The *Bakersfield Citizens* court also cited an industrial and a prison project that were alleged to have blighting impacts. The court noted that in *Christward Ministry v. Superior Court* (1986) (184 Cal. App. 3d 180, 197) (*Christward Ministry*) an agency was required to analyze in the EIR the potential that odors, noise, and traffic from a garbage dump could adversely impact a nearby religious retreat center. The *Bakersfield Citizens* court noted that this was a type of “urban blight” impact. The court also noted that in *City of Pasadena v. State of California* (1993) (14 Cal.App.4th 810) (*City of Pasadena*) the “blighting” impact of a parole office on a nearby residential neighborhood was recognized (however the court held that insufficient evidence had been presented to establish that the parole office may have an urban blight impact.

The proposed World Logistics Project may have a blighting impact on the City of Moreno Valley and the surrounding area, much like the blighting impact of the waste dump discussed in *Christward Ministry*, *supra*, or the parole office discussed in *City of Pasadena*, *supra*. The proposed Project will have a blight and a cumulative blight impact together with other sources of toxic pollution in the area by generating toxic emissions, noise, truck traffic, and other impacts. These impacts depress property values, drive people and businesses away, and create a downward spiral of urban blight. A UCLA study published in the *American Journal of Public Health* (March 1991) found that communities living downwind of sources of air pollution suffer significantly reduced lung function. Psychological studies show that poor air quality and unpredictable industrial noise events adversely affect psychological well-being, concentration levels, and workplace performance. (S. Klitzman and J. Stellman, “The Impact of the Physical Environment on the Psychological Well-Being of Office Workers,” 29(6) *Soc. Sci. Med.* 733-742 (1989).)

These documented impacts, and other impacts identified in the EIR and the comments on the EIR, constitute substantial evidence that the Project may have adverse urban decay impacts on the area that must be analyzed in a supplemental DEIR. The EIR is deficient for ignoring such impacts entirely.

Response 18:

No urban decay impacts will result from the project. The requirements of the WLC Specific Plan will ensure that the project is adequately screened from the community and requires the incorporation of a high-level of architectural design standards that will set the project apart from other such projects. The projects listed in the comment, like a garbage dump and prison, are completely unlike the proposed project that no parallels can be drawn. The Fiscal Study identifies the enormous benefits that will accrue to the City and community as a result of the project.

Comment 19:

Findings must be made for each identified significant impact, and must be supported by substantial evidence in the record. (Sierra Club v. Contra Costa County (1992) 10 Cal.App.4th 1212, 1222 1224.) *Findings must present some explanation to supply the logical step between the ultimate finding and the facts in the record. (Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515.) *When alternatives or mitigation measures are rejected as infeasible, the findings must reveal the agency’s reasons for reaching that conclusion. Conclusory statements are inadequate. (Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1034-1035.) *Finally, detailed findings force decision makers to draw legally relevant sub-conclusions which support their ultimate decisions. In so doing, the agency minimizes the likelihood that it will randomly leap from evidence to conclusions. (Sacramento Old City Assn. v.*

City Council of Sacramento (1991) 229 Cal.App.3d 1011,1034.) CEQA requires that for each significant impact, the agency must make findings that: (1) through changes it avoided or substantially lessened the project's impacts; (2) or, such changes were the responsibility of another agency; (3) or, specific economic, legal, social, technological or other considerations made mitigation infeasible. (CEQA Guidelines, § 15091.)

As discussed above, the EIR failed to disclose numerous significant impacts on traffic, biology, air pollution, urban decay, agriculture and others. Since significant impacts have not been disclosed, the City cannot find that all impacts have been mitigated or avoided if feasible, and cannot issue a statement of overriding considerations. Also, the EIR fails to impose many feasible mitigation measures that have been proposed by experts and even regulatory agencies such as the CARB. Having failed to impose all feasible mitigation measures, the City cannot make the findings required by CEQA.

Across the board, the City's findings contain only ultimate decisions absent proper factual and/or legal sub-conclusions connecting them to the final decision. The City did not make findings to support its decision to approve the Project despite its significant, unmitigated impacts; its unsupported statement of overriding considerations, its failure to mitigate traffic and air quality impacts; and its failure to disclose impacts to agriculture and urban decay.

In Preservation Action Council, Petitioners requested that Respondent City of San Jose reject a proposal by Lowe's Inc. to build a 162,000 square-foot garden center because there was a feasible, reduced-sized alternative that would preserve an historic building. (Id. at 906-7.) Petitioners had submitted comments showing the feasibility of a two-story Lowe's which would avoid tearing down the historic structure. (Ibid.) The City of San Jose rejected the two-story option, based on Lowe's claim that a reduced-sized alternative would be economically infeasible. (Id. at 907.) But the Court rejected the City's finding on this issue as unsupported: "The FEIR provides no independent facts or analysis to support that claim. While it was not necessary for the evidentiary basis for this claim to be contained in the FEIR itself, it was necessary for such a basis to exist in the administrative record." (Id. at 917.) The Court found that neither the final EIR or the administrative record contained the meaningful detail or independent analysis necessary to validate Lowe's' claim that the reduced-size alternative was infeasible, nor did the City Council make a specific finding on the claim that the reduced-size store would be much less profitable. (Id. at 917-18.)

Here the City made the same mistake. As discussed by CARB, the EIR fails to impose feasible mitigation of zero-emission or near-zero-emission trucks. As discussed by Mr. Hagemann, the EIR fails to impose the feasible mitigation of air filtration devices to reduce airborne cancer risks. As discussed by Dr. Smallwood, the EIR fails to impose the feasible mitigation of 1:1 of requiring solar panels on the entire roof area.

As discussed by Mr. House, the EIR fails to impose the feasible mitigation measure of 1-to-1 offsets for agricultural land. These and many other feasible mitigation measures are not implemented, and the findings provide no substantial evidence to support a finding of infeasibility. A supplemental EIR is required to analyze these and all other feasible mitigation measures to reduce Project impacts.

Response 19:

Each of the items listed above is addressed in previous comment responses.

There are no commercially available zero-emission on-road heavy-duty trucks available (See RTC Master Response-3). CARB's own progress report on heavy duty technology and fuels assessment (Draft Heavy-Duty Technology And Fuels Assessment: Overview, April 2015) overview states that the zero and non-zero emission technologies are still at the demonstration phase. The document can be found at the following web address: (http://www.arb.ca.gov/db/search/google_result.htm?q=Heavy+Duty+technology+and+feuls+assessment&whic h=arb_google&cx=006180681887686055858%3Abew1c4wl8hc&srch_words=&cof=FORID%3A11).

The FEIR concluded that a less than significant impact for increased cancer risk would occur (FEIR Volume 3, Section 4.3.6.5, Impacts to Sensitive Receptors). However, the development agreement between the developer and the City requires the developer to outfit the three homes identified as exceeding the OEHHA-based risk calculation with MERV-13 air filters.

There is no evidence that incorporating such solar into the project would reduce demand for other solar projects in Imperial County city by Dr. Smallwood.

The impact to agricultural land is less than significant as discussed in the previous response. As a result, no mitigation is necessary.

Comment 20:

For the foregoing reasons, LIUNA Local Union No. 1 184 and its members living in the City of Moreno Valley and the surrounding areas, urge the City to continue the matter for future consideration pending completion of a supplemental EIR addressing the Project's significant impacts and mitigation measures. Thank you for your attention to these comments. Please include this letter and all attachments hereto in the record of proceedings for this project.

Response 20:

The City appreciates the comments made on the FEIR by the commenter and has provided responses to these comments. All materials provided will be made part of the public record. The City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

MEMORANDUM

DATE: June 4, 2015

TO: Mark Gross
Planning Department
4177 Frederick Street
Moreno Valley, California 92552

FROM: Kent Norton, AICP, Associate
LSA Associates, Inc.

SUBJECT: Response to MVUSD Letter, dated May 28, 2015

In a letter dated May 28, 2015, the Moreno Valley Unified School District submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

COMMENT 1:

FEIR Air Quality and Community Risk and Hazards Comments

Most of the comments provided by MVUSD on the DEIR have been addressed in the revised Air Quality Study and revisions to the FEIR, including:

- » *assessment of acute non-cancer hazards*
- » *discussion on ultrafine particles*
- » *use of the new OEHHA guidance for a school-based health risk assessment*
- » *evaluation of potential risks to 36 schools located within Moreno Valley*

RESPONSE 1:

The City appreciates that MVUSD acknowledges the response to MVUSD's comments. However, all of MVUSD's comments on the DEIR were addressed as set forth in Volume 1 of the FEIR under the response to comment Letter E-3.

COMMENT 2:

The conclusions of the FEIR are that there would be no excess cancer risk or acute/chronic hazards to occupants of the MVUSD schools with implementation of the proposed project. However, we feel that the assertion in the FEIR that the proposed project would not result in any cancer risks from diesel emissions is overstating the results of the Advanced Collaborative Emissions Study (ACES), as described in more detail in the following paragraphs.

RESPONSE 2:

MVUSD's comments confuse the analysis for cancer risk with the distinct and separate analysis for acute/chronic hazards. While the cancer risk analysis did rely on the ACES prepared by HEI, the analysis for acute/chronic hazards relied on SCAQMD guidelines for analysis. Also, MVUSD does not acknowledge that while not necessary, the FEIR also included a cancer risk analysis based upon the most up-to-date OEHHA methodology which found no cancer impacts outside the project boundaries. In summary, regardless of methodology, there are no cancer or acute/chronic hazards outside the project boundaries. In addition, on the basis of the ACES prepared by HEI, there are no cancer or acute/chronic hazards within the project boundaries.

Further, the FEIR does not overstate the conclusion of the study. In their own words, the study authors found that “in contrast to previous health studies of TDE [traditional diesel exhaust], the ACES study found that lifetime exposure did not induce tumors or pre-cancerous changes in the lung and did not increase tumors related to NTDE [new technology diesel exhaust] in any other tissue.”

COMMENT 3:

Master Response-2: Health Effects of Diesel Particulate Matter. Page 233 of the FEIR (also identified in Master Response-1 on page 221). This response does not correctly apply the findings of the new technology diesel exhaust (NTDE) in the ACES to the proposed project. The Master Response states that the proposed project would not result in any cancer risk from diesel emissions.

Although the results of the ACES report are encouraging, the conclusion reported in the FEIR that there is no cancer risk from "new technology trucks" is premature. In addition, "older" diesel trucks on the roads will continue to pose risks. The responses to comments made throughout the FEIR compare the reduction in risks from "older" trucks to "newer" trucks as the reason for rejecting additional mitigation.

The ACES report showed that rats and mice exposed to emissions from the new diesel engine exhaust did not develop lung tumors or toxic health impacts, although there were some minor physiological effects. There were small decreases in respiratory function and some signs of lung inflammation in the rats exposed to the highest DPM concentrations, but the effects were not severe. However, the study only looked at tissues and pulmonary function; other endpoints won't be evaluated until after the rodents are euthanized. Although the results are promising, it's premature to say the new NTDE engines eliminated all health impacts from diesel exhaust and there is no cancer risk.

RESPONSE 3:

MVUSD's comment claims that reliance on the HEI ACES is premature because it looked at a limited number of health endpoints, specifically “tissues and pulmonary function”. This statement is both incorrect and not applicable. It is incorrect because HEI “evaluated animals histologically throughout the study for the presence of tumors and other types of lesions in the airways and in multiple tissues. In addition, they examined a vast array of biologic endpoints: hematologic (several cell types, plus coagulation), serum chemistry (including triglyceride and protein components), lung lavage (including numbers of cells and levels of multiple cytokines and markers of oxidative stress and tissue injury), and pulmonary function (HEI ACES Report p. 2).” That evaluation allowed HEI “to analyze the data from more than 100 endpoints in the broad areas of histology, serum chemistry, systemic and lung inflammation, and respiratory function, the investigators confirmed the a priori hypothesis, namely, that NTDE would not cause an increase in tumor formation or substantial toxic health effects in rats, although some biologic effects might occur (HEI ACES Report p.3).” It is not applicable because the HEI ACES was relied upon in the FEIR to analyze only the cancer impacts of the WLC project, other health endpoints were evaluated using SCAQMD guidelines for acute/chronic hazards.

MVUSD's comment regarding older diesel trucks does not apply to the WLC project because the WLC project prohibits such trucks. (WLC Project FEIR, Volume 3, p. 4.3-97, MM 4.3.6.3B(1)) The fact that other projects continue to rely on such trucks has no bearing on the environmental impacts of the WLC project.

Finally, the HEI ACES is a peer-reviewed lifetime exposure study of new technology diesel exhaust whose ACES Steering Committee included U.S. EPA, California Air Resources Board, and Natural Resources Defense Council (HEI ACES Report p.xii). In addition, the “draft reports were evaluated by the HEI ACES Review Panel — an independent panel of distinguished scientists who had no involvement in selecting or overseeing these studies and included some members of the HEI Review Committee (HEI ACES Report p.vii).” The study represents the latest scientific information on the health effects of new diesel technology exhaust.

COMMENT 4:

Furthermore, these findings are not consistent with the Office of Environmental Health Hazards Assessment (OEHHA) updated guidelines on health risk, which show an increased lifetime risk for early childhood exposure. The conclusion that "diesel exhaust does not contribute to cancer" (see also page 237) is not factual.

RESPONSE 4:

MVUSD's comment that the findings are not consistent with updated OEHHA guidelines is not accurate. The FEIR does contain a full analysis of the cancer impacts of the project using the updated OEHHA guidelines. That analysis finds there is no significant impact beyond the project boundaries and that only three homes within the project boundaries would experience a potentially significant impact. The FEIR then relies upon the HEI ACES to demonstrate that since the project requires new technology diesel engines, which do not contribute to cancer, there would be no significant cancer-related health impact. While MVUSD states the conclusion is not factual, it is, in fact, the primary conclusion of the HEI ACES: "that NTDE would not cause an increase in tumor formation or substantial toxic health effects." (HEI ACES Report p.3)

COMMENT 5:

Master Response-5: Air Filtration Systems for Residences. (Page 237 of the FEIR.) The conclusion of the health risk assessment was that operation of the project would not significantly contribute to health risk impacts outside the project site boundaries; therefore, the students and staff at MVUSD schools would not be adversely impacted by the project. However, the conclusion that "diesel exhaust does not contribute to cancer" is not factual (see our comments on Master Response-2). Response to Comment E-3-6. Page 325 of the FEIR. This response does not respond to the comment that the Reference Exposure Level (REL) does not account for all of the known health effects from diesel particulate matter, especially in children. The limitations of the methodology must be disclosed in the FEIR.

RESPONSE 5:

All current methods, including the recently updated OEHHA guidelines, were used to evaluate health impacts of the project. MVUSD does not identify which impacts are known and quantifiable but not addressed by the REL and the EIR preparer is not aware of any health effects which are not addressed by the REL. These issues are fully responded to Response to Comment E-3-5.

COMMENT 6:

Recirculation of the DEIR is Required. The FEIR adds significant new information to the DEIR, requiring recirculation pursuant to CEQA Guidelines Section 15088.5. The project description has change significantly since circulation of the DEIR, including but not limited to a change in boundary, a change in project buildout by eight years, and a reduction in one million square feet of development. This resulted in substantial changes throughout the DEIR; without recirculation the public is deprived of a meaningful opportunity to comment. Further, a significant number of new mitigation measures have been added, the environmental effects of which have not been evaluated.

RESPONSE 6:

CEQA Guidelines Section 15088.5 actually states that "new information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect". The impacts described in the FEIR are similar to or less than the impacts described in the DEIR. New, though not significant, information that was added to the document responds to comments; merely clarifies or amplifies existing information; or adds new mitigation measures, any impacts of which have been fully evaluated in the FEIR.

COMMENT 7:

Additionally, Mitigation Measure 4.5.6.1 B impermissibly defers analysis to a future project-level EIR. The revised DEIR must be recirculated for public review taking into account the above comments.

RESPONSE 7:

MM 4.5.6.1B does not impermissibly defer analysis. Rather it sets out the requirements to properly mitigate any potential impact to cultural resources encountered over the course of development. By laying out performance standards in the mitigation measure, MM 4.5.6.1B properly complies with CEQA.

COMMENT 8:***Draft Facts, Findings and Statement of Overriding Considerations***

Page 225 through page 226. The District takes issue with the statement of overriding consideration, which states:

"Approval of the Project Will Ensure that the Health of Residents, School Children and Workers, both Within and Outside of the Project Area, Will Not Be Adversely Affected by the Construction and Operation of the Project"

While the project has reduced health risks to sensitive receptors in the area, "approval of the project" will result in a significant increase in air pollutant emissions and health risk from the substantial increase in diesel truck traffic. This discussion goes on to say that:

"... diesel trucks which comply with stringent US EPA and CARB 2010 standard do not cause cancer or adverse health effect." And

"As a result, the city will enjoy the numerous benefits which will flow from the construction and operation of the project without subjecting anyone to the risk of cancer and other adverse health effects which result from the use of older diesel trucks." (underline added)

These statements are misquoted, because diesel particulate matter (DPM) is an air toxic contaminant (TAC). In fact, as identified in the latest Multiple Air Toxics Exposure Study (MATES-IV) conducted by the South Coast Air Quality Management District, DPM is still the primary driver of cancer risk in the air basin.

Unless 2010 trucks are mandated to not use diesel fuel, this statement of overriding considerations should be removed because it mischaracterizes risks (see comments on the FEIR Master Response-2, above). Impacts of the project may be minimized and/or less than 10 in a million cancer risk; but it does not mean there is "no risk" and "no health impacts." These statements contradict the significant unavoidable impact for localized construction and operational criteria air pollutant emissions identified in the EIR.

RESPONSE 8:

The conclusions of the Draft Facts, Findings and Statement of Overriding Considerations are correct. While MATES-IV does show that diesel exhaust is the primary driver of cancer risk, that is due to the fact that majority of diesel trucks on the road represent traditional diesel engine technology, not the new technology 2010 trucks that are a requirement of the WLC project. Furthermore, OEHHA characterized diesel exhaust as a toxic air contaminant based upon studies evaluating the effects of traditional diesel exhaust. None of the studies that OEHHA relied upon evaluated the effects of new technology diesel exhaust as described in the HEI ACES. In fact, HEI ACES represents the latest scientific evidence regarding cancer risk and that study concluded that "that NTDE would not cause an increase in tumor formation or substantial toxic health effects". Finally, in regard to non-cancer health effects from diesel exhaust, the FEIR also includes the standard analyses recommended by SCAQMD and found no significant health impacts.

RESPONSE SUMMARY: The conclusions contained in the FEIR are based upon the latest scientific evidence. Where the FEIR differs from standard analyses, such as the use of the updated OEHHA guidelines, those standard analyses are also fully evaluated and presented as well. Even the traditional analyses show no health-related impacts outside the project boundaries.

MEMORANDUM

DATE: June 10, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to Letter from T. Paulek & S. Nash dated June 9, 2015**

In a letter dated June 9, 2015, Tom Paulek and Susan Nash submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

Comment 1:

The Attachments to our April 5, 2013 Draft EIR comment letter (FEIR letter G-89) were wrongly detached and excluded from the Final EIR. These attachments were obtained as a result of our citizen public Records Act request to the state Wildlife Conservation Board (WCB) and the western Riverside County Regional Conservation Authority (RCA) [Responsible for MSHCP Implementation].

Response 1:

The commenters are incorrect - the seven attachments to the April 5 comment letter were in fact included in the Final EIR on the flash drive that was distributed with all the EIR documents – it was in the Final EIR Volume 1 – Response to Comments – Comment Letter Appendices labeled Letter G-89. The City website and several flash drives were randomly checked and all contained all seven of the cited attachments.

Comment 2:

The attachments are once again being submitted to project decision makers to disclose the fraudulent project description of the public lands of the San Jacinto Wildlife Area (SJWA) immediately south of the World Logistics Center Specific Plan as the “CDFG Conservation Buffer Area”. The attachments appended include:

ATTACHMENT #1: *State Wildlife Conservation Board (WCB) minutes of May 18, 2001 Agenda Item 31 – San Jacinto Wildlife Area Expansions 15 through 19.*

ATTACHMENT #2: *Excerpts from text of Proposition 12 approved by voters in 2000 indicated the subject land was purchased by the public “for the restoration or acquisition from a willing seller, of habitat for threatened or endangered species or for the purpose of promoting the recovery of those species.”*

ATTACHMENT #3, 4, 5, and 6: *documents the SJWA public lands erroneously designed “CDFW Conservation Buffer Area” were included in the 2004 MSHCP Conservation Area and counted toward Additional Reserve lands by the Regional Conservation Authority (RCA) [see Attachment #6]*

ATTACHMENT #7: *The Department of Fish and Game Management Authorization (May 6, 1996) implementing the Stephen’s Kangaroo Rat Habitat Conservation Plan (SKRHCP). Both the SKRHCP as well as the subsequent MSHCP issued under the Natural Community Conservation Planning Act (NCCP Act). The NCCP Act does not exempt a project in a natural community conservation planning area from the California Environmental Quality Act or alters or affects the applicability of CEQA (see Fish and Game Code: 2826).*

The City’s change of the land use designation on the public lands of the San Jacinto Wildlife Area to “Open Space” does not obviate the need to analyze and mitigate the impacts of the World Logistics Center on these MSHCP designated wildlife conservation lands. In addition, we object to the fraudulent project description and

the improper use of a Program EIR for this Project. The City's consideration of this Project must be deferred pending public review of a legally adequate environmental document.

Response 2:

Draft EIR Section 4.4.1.10, *Wildlife in the SJWA and Mystic Lake* (DEIR pages 4.4-16 and 17) goes into detail on the classification of this open space land and cites the same material submitted by the commenters. In fact, Attachment #1 submitted by the commenters clearly states the following (regarding expansions 15 through 19)...*"The DFG has identified the subject properties as being within a Significant Natural Area and has recommended the purchase of the property as an addition to the existing WLA. The acquisition of the subject properties are important to the wildlife area as they will serve as a buffer from development north of the WLA and adds significant wildlife benefits to the WLA."* [emphasis added, citation from page 56 of Attachment 1]. Further, it should be noted the WLC EIR requires a 250-foot additional buffer with no development and an additional 150-foot buffer with no buildings both located along the southern boundary of the WLCSP adjacent to the San Jacinto Wildlife Area. The rest of the attachments submitted by the commenters appear to have been submitted to support the contention that the SJWA is an established conservation area, including the property designated in the WLC EIR as the CDFG Conservation Buffer Area. This term was meant to accurately characterize the approved and actual use of the site as an upland buffer between development to the north and the wetland resources of the SJWA to the south. The EIR clearly acknowledges this area is part of the SJWA, and provides an additional 400 feet of buffer area adjacent to the SJWA.

Regarding the use of a programmatic EIR, the Draft and Final EIR documents clearly explain why a programmatic document is appropriate for the WLCSP in that no specific buildings have been proposed at this time. Additional CEQA analysis and documentation will be done as specific development is proposed in the future. The City considers the EIR for the WLC project to be legally adequate and provides appropriate information for local decision-makers.

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MEMORANDUM

DATE: June 10, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: Response to Letter from RCTC dated June 9, 2015

In a letter dated June 9, 2015, Anne Mayer with the Riverside County Transportation Commission (RCTC) submitted comments on the WLC Project FEIR.

COMMENTS

...After reviewing the Project's recently released Final Environmental Impact Report (FEIR), the Commission is concerned the Project's significant traffic impacts have not been adequately addressed or mitigated...The FEIR demonstrates that the Project's traffic impact to State Route 60 will be significant. Here, the proposed fair share payment mitigation is not only inadequate to mitigate for the Project's interim traffic impacts that will occur until improvements are constructed but fair share payments are not even possible for improvements to SR-60. This is because a fair share program does not exist. The Commission believes it is insufficient for the FEIR to simply conclude "[i]f no fair share program exists or if the existing programs are not consistent with the requirements below, then no payment of fees shall be required." (FEIR at 4.15-235.) A more proactive approach is warranted and feasible under these circumstances so the Project's significant impacts do not go unmitigated.

Furthermore, although the FEIR does call for widening of Gilman Springs Road to up to six lanes, there do not appear to be any plans to make adequate improvements to SR-79, a four-lane road, to handle the influx of traffic that will enter SR-79 from Gilman Springs Road. In short, the approval of the proposed Project would result in far-reaching traffic impacts to surrounding local and regional transportation corridors. It is for these reasons the Commission strongly urges the City to work with regional and state partners to develop an appropriate fair share program that would mitigate for the Project's proportional impacts to SR-60 and SR-79, as well as other nearby regional road networks that will be impacted by the Project.

The FEIR also makes clear the Project's traffic impacts to Gilman Springs Road would be significant. As you are aware, Gilman Springs Road is a narrow two-lane road, such that extensive improvements will be needed for it to adequately handle the truck traffic that is anticipated by the Project. To mitigate for the Project's impacts, the FEIR indicates the Project developer will be required to pay the Project's fair share for improvements to Gilman Springs Road. Unfortunately, a fair share payment does not ensure adequate mitigation of the Project's impacts because there is no assurance of when the necessary improvement will be built, if ever.

More specifically, the Commission is concerned about the interim traffic impacts that will occur until such time as the improvements required to adequately mitigate the Project's impacts are actually completed. Because the Project will cause a significant increase in traffic, and because there is no assurance the Project's traffic impacts will be adequately mitigated prior to Project construction, the Commission urges the City to restrict Project construction approvals until such time as the City and Project developer can demonstrate all traffic improvements necessary to fully mitigate the impacts related to any particular building's construction or occupancy are completed. Such assurance might be achieved through the imposition of a mitigation measure restricting the approval of any site-specific plans or the issuance of any construction permits until the physical

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improvements necessary to mitigate for the development's proportionate impacts are actually constructed. Although the Commission understands the construction of transportation improvements may need to occur on a phased basis, the mere payment of the Project's fair share toward traffic improvements is meaningless mitigation if improvements are not built concurrently with the development that merits them.

Finally, the Commission has concerns regarding the FEIR's analysis of the Project's long-term traffic impacts. Although traffic impacts to SR-50 and Gilman Springs Road are considered significant and unavoidable, this conclusion is based solely on the City's lack of authority to implement improvements to these roadways. That is, the FEIR indicates all traffic impacts would be fully mitigated, but for this lack of authority.

The Commission greatly appreciates the City's thoughtful consideration of its comments and concerns, and we would be pleased to meet with you to further discuss our comments. We respectfully request:

- *The City require the development of a fair share contribution plan for SR-60, SR-79, and Gilman Springs Road, as a mitigation measure for any Project approval.*
- *The City impose a mitigation measure requiring the City and the applicant to work with the Commission, Caltrans, the county of Riverside, and other local and regional stakeholders to develop a regional transportation improvement plan for the area encompassing SR-50, SR-79, and Gilman Springs Road.*
- *The City add the Commission to the World Logistics Center, including City's notification list for all Brown any hearing notices and any Notice Act and CEQA notices related to of Determination.*

RESPONSE

Since the City cannot guarantee that improvements outside of its jurisdiction will be made, it has no choice but to find impacts outside the City as significant and unavoidable under CEQA. The City has no ability to compel regional and State agencies to take the necessary actions required to improve regional infrastructure. What the City can do is ensure that developments within the City pay their fair share when such actions by regional and State agencies do occur. The FEIR contains a series of mitigation measures to ensure that traffic impacts are addressed (Mitigation Measures 4.15.7.4A-4.15.7.4G). These measures require the improvement of right-of-way within the City's jurisdiction, the payment of fair share costs to jurisdictions outside the City, payment of TUMF fees (estimated at \$34.1 million in TUMF fees), and coordination with outside jurisdictions regarding constructing improvements outside the City's jurisdiction. The City will work with TMLA, RCTC, and WRCOG to ensure that improvements of regional benefit are constructed. However, it is unreasonable to restrict development until such time that regional agencies are prepared to construct necessary and needed regional infrastructure. Doing so would effectively give agencies outside the City a veto on any City development.

The FEIR identified impacts (increased delay) and mitigation (signalization) at the intersections of SR-79 and Gilman Springs Road (FEIR Volume 3, Section 4.15 & Appendix L – Traffic Impact Analysis). Since those intersections are outside the jurisdiction of the City, mitigation will be subject to requirements found in Mitigation Measures 4.15.7.4A-4.15.7.4G. The FEIR did not identify any impacts to road sections along SR-79 itself because the project did not generate 50 or more trips on any segment of SR-79 to warrant further review. RCTC requests that the City require the development of a fair share contribution plan for SR-60, SR-79, and Gilman Springs Road as a mitigation measure for any Project approval. However, only those agencies responsible for the identified infrastructure can develop a fair share contribution plan. The FEIR requires the payment of fair share and identifies the formula for doing so. (Mitigation Measures 4.15.7.4D, E and F)

RCTC requests that the City require the applicant and City to work with regional and State agencies to develop a regional transportation improvement plan. Such a requirement is beyond the scope of any single project. The FEIR identifies all the transportation-related impacts that the project would generate, identifies the necessary mitigation, and requires the payment of fair share costs for such impacts. Those are the actions that are within

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the jurisdiction of the City. Regional and State agencies must be responsible for implementation of projects within their jurisdiction.

RCTC requests that the City include the RCTC on all notices for the project. The City has done so.

MEMORANDUM

DATE: June 4, 2015

PROJECT: World Logistics Center Final EIR

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate
LSA Associates, Inc.

SUBJECT: **Response to RWQCB Email dated June 3, 2015**

On June 3, 2015 Glenn Robertson, an Engineering Geologist and CEQA Coordinator in the Regional Planning Programs Section of the Santa Ana Regional Water Quality Control Board sent an email to you making the following comments regarding the Final EIR:

Comment 1:

I have seen no notice of the City of Moreno Valley receiving comment on the Final EIR of the World Logistics Center before your June 11 Planning Commission hearing, but I have received public inquiry as to whether you still may be taking reactions into the meeting. I reread our Regional Board staff's April 25, 2013 letter for the DEIR, compared with answers by Final EIR Response to Comments (RTC), for any discrepancies on BMPs leading up to adoption of the project. We do have one concern that for us has always been unclear.

Aside from those RTC answers that essentially state that site BMPs are detailed in the Water Quality Management Plan, and that bioretention areas may be used in conjunction with detention/infiltration basins to capture and treat runoff from this large warehouse and transport project, Board staff do suggest inclusion of distinct plans for a structural BMP with absorbant material or other means to capture/separate oil and other automotive fluids that are likely to be carried toward the basins. We suggest that the first BMP that runoff enters may separate hydrocarbons from the water, and that characteristics of the bio-retention areas may be designed to only subsequently "polish" the flows. This can be discussed between your staff and our Inland Stormwater staff as final design moves forward.

Response 1:

The following discussion from Section 4.9, Volume 3, page 4.9-56 of the FEIR addresses the concern raised:

The project will comply with the *Water Quality Management Plan for the Santa Ana Region of Riverside County* (approved by the Santa Ana Regional Water Quality Control Board October 22, 2012), which requires the use of Low Impact Development (LID) BMPs that maximize infiltration, harvest and use, evapotranspiration and/or bio-treatment. Flows from the project will be treated first by LID BMPs where the flow will be infiltrated, evapotranspired, or treated. As required by **Mitigation Measure 4.9.6.1A**, the treated flows will then be reduced to below or equal to pre-development conditions by routing the on-site storm water flows through a series of on-site detention and infiltration basins before flows are released off site. These basins will provide incidental infiltration and secondary treatment downstream of the LID BMPs. All runoff from the site will be treated by LID BMPs and then routed through the detention and infiltration basins before it leaves the project area and into Mystic Lake and the San Jacinto Wildlife Area.

The Water Quality Management Plan Guidance Document for the Santa Ana Region of Riverside County discusses water quality impacts and the use of LID BMPs:

“LID BMPs have been shown in studies throughout the country to be effective and reliable at treating a wide range of Pollutants that can be found in urban runoff, including those listed above, and those subject to adopted

TMDLs in the Santa Ana Region of Riverside County (Bacteria and Nutrients). As such, the LID BMPs required in this WQMP are expected to treat discharges of urban-sourced 303(d) listed Pollutants from subject projects to an impaired waterbody on the 303(d) list such that the discharge from the project would not cause or contribute to an exceedance of Receiving Water Quality Objectives.”

Since SARWQCB has found that lids are “effective and reliable” and that their use “would not cause or contribute to an exceedance”, the MM 4.9.6.1A addresses the concern raised in the comment. However, if a project-level review determines that additional BMPs are required to control pollutants from stormwater pollutant runoff, those BMPs would be considered as part of the project-level environmental review and NPDES permitting process. The separation of oil and other potential vehicle fluids from storm water runoff will be one of the primary objectives in the evaluation for treatment of runoff. During the preliminary and final design of each future building, BMP measures will be incorporated into the design to treat the pollutants of concern (POC). If absorbent material is the Best Available Technology (BAT) to achieve separation of oil and other vehicle fluids from runoff then it will be included in the treatment train used. The overall goal is to direct project runoff to adjacent landscaped areas where it will be allowed to infiltrate and support the proposed drought tolerant landscape, reducing and/or eliminating the need for irrigation.

RESPONSE SUMMARY: Future development under the WLC Specific Plan will meet all applicable laws, regulations, and permitting requirements in consultation with permitting agencies as appropriate, including the RWQCB, as outlined in the WLCSP EIR as part of future discretionary approvals.

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MEMORANDUM

DATE: June 10, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: Response to RivCo TLMA Letter dated June 8, 2015

In a letter dated June 8, 2015, Juan Perez with the Riverside County Transportation and Land Management Agency (TLMA) submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

COMMENTS

The County of Riverside Transportation and Land Management Agency (TLMA) appreciates the opportunity to submit our comments regarding the project and the Final Environmental Impact Report (FEIR).

Our concerns are primarily focused on the expected traffic impacts of the project, particularly impacts identified on Gilman Springs Road, which is under shared County-City jurisdiction from SR 60 to about a mile south of Alessandro Blvd. and then within County jurisdiction south easterly to Lambs Canyon (S.R. 79)/Sanderson Avenue. We are also concerned about the project's regional impacts on SR 60. The project traffic study estimates that it will generate 68,721 total vehicle trips of which 14,007 are a mix of trucks. When converting to Passenger Car Equivalents (PCE), as the EIR does in conformance with standard practice, this results in adding the equivalent of 89,975 surface street trips and 75,724 freeway trips. (EIR 4.15-47)

Gilman Springs Road in its current configuration is a two-lane rural road that extends from SR 60 to Lambs Canyon/Sanderson Avenue (and then further south to State Street). It provides the primary direct connection between the City of Moreno Valley, SR 60, and the San Jacinto Valley. It is a critical regional connector that, according to the EIR, carries approximately 14,400 vehicle trips per day at its peak location.

The County has made significant improvements to this roadway over the years to enhance operations and safety, such as curve realignments, a passing lane, repaving, enhanced pavement markings, and use of radar speed feedback signs. However, the road is operating at its practical capacity as a two-lane road, and adding significant traffic volumes to it as this project would do, without further significant improvements including road widening, would be highly detrimental to traffic safety and mobility. We are particularly concerned about the addition of a significant number of trucks anticipated with this project given its rural two-lane character, without further improvements being done in conjunction.

Our analysis of the EIR data indicates that the project will add an estimated 6,019 autos and 420 trucks daily to Gilman Springs Road. The EIR identifies that the project would have a significant cumulative impact on Gilman Springs Road from Alessandro Blvd. to Bridge St., and on Gilman Springs Road between SR 60 and Alessandro Blvd. These impacts occur under Phase 1 of the project based on existing conditions (EIR 4.15-103), at year 2022 (EIR 4.15-153), and at project build-out under cumulative 2035 conditions. We note that the EIR does not address the segment of Gilman Springs Road from Bridge Street south-easterly to Lambs Canyon/Sanderson. Although some project traffic can be expected to use Bridge Street to access the Ramona Expressway as a direct connection, it is still expected that a significant amount would continue on to the San Jacinto Valley, and some even to the Pass area through Lambs Canyon to the north, by using Gilman Springs Road down to Lambs Canyon/Sanderson Avenue.

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We appreciate that the EIR identifies that "Gilman Springs Road from Alessandro Blvd. to Bridge St. (S-16) is already deficient and needs to be widened to four lanes and will need to be widened to six lanes in the future. In accordance with General Plan Policy 5.5.7, the City will require the developer to widen Gilman Springs Road to provide three southbound lanes and one northbound lane along the frontage of the WLC project. The developer will receive a TUMF credit for the portion of the cost of this improvement that exceeds the project's fair share contribution." (EIR 4.15-194).

However, we are highly concerned by the statements that follow, which are also reflected in the mitigation measures: "However because Gilman Springs Road is partially a Riverside County facility and is thus partially outside the jurisdiction of the City of Moreno Valley the City cannot ensure that the identified improvements would be made outside of its jurisdiction. Moreover there are right-of-way constraints involving sensitive environmental areas that may limit widening to four lanes between Alessandro Blvd. and Bridge St., or even preclude any widening at all. The project's impacts in the Existing Plus Project scenario on Gilman Springs Road must therefore be considered significant and unavoidable. The City will work with Riverside County to find funding for improvements that would provide an acceptable LOS on this road to the extent feasible.

We also note that the EIR identifies that Gilman Springs Road will be widened from 2 to 6 lanes by 2022 south of Alessandro, within County jurisdiction (EIR Fig 4.15.5). We note that the County does not have any active projects on Gilman Springs Road to accomplish this as a feasible goal given the state of our regional and local funding programs. Moreover, since much of the land adjacent to Gilman Springs Road is identified to be set aside for open space, it is not feasible to anticipate that other future development projects would cause major widening improvements to be done within the foreseeable future.

Our position is that improving Gilman Springs Road to a minimum of 4 lanes from SR 60 to Lambs Canyon/Sanderson Avenue is critically important for safety and mobility, and to mitigate direct project impacts. Improvements will be needed at the Gilman Springs Road/SR 60 Interchange consistent with the road widening. Rather than 3 southbound lanes and 1 northbound lane as stated in the EIR, the road needs to be widened to 4 lanes with 2 through lanes and adequate shoulders in each direction. This requirement needs to be tied to the issuance of building permits for the project to assure that project traffic does not degrade conditions on the road.

As the responsible agency for the segments of Gilman Springs Road not in City jurisdiction, County TLMA is willing to work with the applicant and the City of Moreno Valley to provide that the necessary improvements are constructed. This project is expected to generate a very substantial amount of Transportation Uniform Mitigation Fees (TUMF) given its vast size, and Gilman Springs Road is a TUMF eligible facility. It would be a benefit to all users of the road, including the project traffic, to directly construct improvements on Gilman Springs Road for which the project would receive appropriate TUMF fee credit, rather than merely the payment of TUMF fees as has been included in the mitigation measures.

The EIR identifies that, for truck traffic, 82% would be to/from the west via one or more freeways (EIR 4.15-49), which would primarily be SR 60, and that 44% of daily passenger autos would use SR 60. Applying these percentages to the overall trip generation, we estimate that the project would add the equivalent (PCE) of 41,302 passenger trips to SR 60 to the west, and 6,815 trips on SR 60 to the east. Although the traffic study states that, because of a counter peak hour traffic pattern (eastbound in the am and westbound in the pm) the project will be served by some of the underutilized peak hour capacity of SR 60, a more rigorous analysis would show that given the sheer volume of project traffic generation there would be project impacts on SR 60.

Unlike other freeways in Western Riverside County, mainline improvements to SR 60 between I-215 and Gilman Springs Road are not, to our knowledge, included in the Measure "A" expenditure plan. Given the vast scale of this project, it is important that it serve as a catalyst for Caltrans, the Riverside County Transportation Commission (RCTC), affected Cities and the County to come together in a discussion of how to address this need and jointly develop a plan. We do recognize that funding of freeway improvements needs to be

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to a great degree a Federal and State responsibility. However, as we have seen on other freeway projects, our regional and local agencies, under the leadership of RCTC, have had to play an active role through Measure A and other means to secure complimentary funding for freeway improvements.

Requested Conditions of Approval. We therefore urge the Planning Commission to incorporate the following measures as Conditions of Approval for the project:

1. Require that the phased issuance of project building permits be tied to the construction of improvements on Gilman Springs Road to 4-lanes, at a minimum, between SR 60 and Lambs Canyon/Sanderson Avenue, and of improvements to the SR 60/Gilman Springs Road interchange. This would be done in accordance with a phasing improvement plan jointly developed by the applicant, the City, and the County of Riverside.
2. Require that a regional improvement plan be prepared to address needed improvements to SR 60 between I-215 and Gilman Springs Road that is tied to Phase 2 of the project proceeding. This would allow some reasonable time for affected agencies to work together and develop an overall funding strategy. The improvement plan would include a mix of Federal, State, regional, and other potential funds, including an appropriate fair share of development contributions from projects in proximity to SR 60 that directly and significantly impact the segment between I-215 and Gilman Springs Road.
3. The County and Caltrans are working on the design of a traffic signal/roadway safety improvement project at the Gilman Springs/Lambs Canyon/Sanderson Avenue ramps. Require a fair-share contribution, via an agreement between the applicant, City, County, and Caltrans, towards construction of these facilities to mitigate project impacts.
4. Require a fair-share contribution, via an agreement between the applicant, City, and County, to mitigate project impacts at the intersection of San Timoteo Road/Live Oak Canyon (EIR 4.15-237).
5. Require a fair-share contribution, via an agreement between the applicant, City, and County to mitigate project impacts at the intersection of Bridge Street/Ramona Expressway (EIR 4.15-3). Although this intersection may potentially have a different configuration or be grade separated in the future as the EIR states, the project will create significant impacts that could be alleviated through an interim improvement project if it proceeds ahead of other future improvements.

We are available to meet with the applicant and City staff to discuss our comments, and to work towards the implementation of the improvements necessary to address project impacts and improve regional transportation safety and mobility.

RESPONSE

Since the City cannot guarantee that improvements outside of its jurisdiction will be made, it has no choice but to find impacts outside the City as significant and unavoidable under CEQA. As noted in the comment, the FEIR contains a series of mitigation measures to ensure that traffic impacts are addressed (Mitigation Measures 4.15.7.4A-4.15.7.4G). These measures require the improvement of right-of-way within the City's jurisdiction, the payment of fairshare costs to jurisdictions outside the City, payment of TUMF fees (estimated at \$34.1 million in TUMF fees), and coordination with outside jurisdictions regarding constructing improvements outside the City's control. The City will work with TMLA, RCTC, and WRCOG to ensure that improvements of regional benefit are constructed.

MEMORANDUM

DATE: June 30, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **2nd Responses to Email or Letter Comments from Various Persons up to June 30, 2015**

In a number of emails and/or attached letters received on or before June 30, 2015, various residents submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

Ann McKibben (June 10, 2015) Emailed Letter**Comment 1:**

I am writing to ask each one of you to vote no on the proposed World Logistics Center (WLC) project at your June 11, 2015 meeting. The 40.6 million square foot project (the size of 700 full-sized football fields) will have severe negative impacts on the city and its quality of life. Air Quality—The project will increase air pollution, fine and ultra-fine diesel particulates which are known to have negative effects on children’s health, those with asthma, lung disease and the elderly. The following source (<http://www.catf.us/diesel/dieselhealth/DieselSootHealthImpacts;CleanAirTaskForce;map>) states that: “The average lifetime diesel soot cancer risk for a resident of Riverside County is 1 in 3,917. This risk is 255 times greater than EPA’s acceptable cancer level of 1 in a million.”

Response 1:

DEIR Section 4.3 examined various air quality impacts, including cancer and non-cancer health hazards, and determined the project would have significant air quality impacts. Therefore, the City will have to adopt a Statement of Overriding Considerations if it approves the WLC project.

Comment 2:

I also ask you to read the California Air Resources Board comment letter that was sent to the city this week stating that the environmental impact report is “legally inadequate”. Please read the Press Enterprise article of June 10, 2015: <http://www.pe.com/articles/city-769741-air-health.html>

Response 2:

The commenter is referred to the responses to the CARB letter regarding air quality.

Comment 3:

Traffic—Beside clogging Moreno Valley streets & freeway, many cities such as Riverside have stated their concerns about the increase in traffic (69,000 vehicle trips per day) for the region and the ability of regional governments to adapt freeways to accommodate the increase, and local governments to deal with increased congestions to side streets, etc.

Response 3:

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including local streets and freeway traffic on the SR-60 freeway. As indicated in the Traffic Impact Assessment, jobs in east end help reverse the commuting traffic direction during peak periods on the SR-60 freeway. The EIR determined the project would have significant traffic impacts even with mitigation (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project’s benefits outweigh its anticipated impacts.

Comment 4:

I understand the need for more local jobs to help those who currently commute long distances to work. What I don't see is an attempt to bring in diverse businesses and jobs that will bring more balance to employment in the city. Putting all of the city's hopes into one project is extremely short-sighted. The developer may see himself as the expert on all things Moreno Valley, but what the residents see is divisiveness. Moreno Valley can do better than this lop-sided proposal.

Response 4:

The WLC plan responds to the City's Economic Development Action Plan adopted by the city council in April 2013 which calls for improving the job to housing ratio in Moreno Valley. The DEIR did examine a number of alternatives, including:

- No Project/No Build Alternative;
- No Project/Existing General Plan (Moreno Highlands Specific Plan);
- Alternative 1: Reduced Density (29 MSF or 30 percent less logistics warehousing);
- Alternative 2: Mixed Use A – Warehousing/Business Park/Office/Commercial;
- Alternative 3: Mixed Use B – MHSP with logistics warehousing; and
- Alternative Sites: Moving the project to some other available site.

Every one of these scenarios provides a mix of impacts and benefits. The Planning Commission and the City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Allan Smiley (June 25, 2015) Email**Comment 1:**

In reviewing various documents and reports, I find that there is a gross misrepresentation and a lack of a true study that will impact the use of Cactus Avenue and will have disastrous impact on all Moreno Valley residents. The reports totally understate the vehicle impact, the smog emissions, and the dangers to the health and well being not only those who live either on Cactus Avenue or those within proximity of Cactus Avenue. From what I have read, there is a proposal that Cactus Avenue, would extend from the 215 Freeway to the end of Cactus, past Redlands Blvd / JFK Drive. The amount of traffic measured in the report state approximately a few hundred vehicle trips a day, but that is only from the corners of Redlands/JFK and Cactus Ave. It does not take into consideration the amount of traffic that would extend through the city of Moreno Valley starting at the 215 Freeway exit to the Cactus Avenue extension and onward to the Logistics Center. That amount of vehicle traffic amounts to thousands and thousands of trips daily with the majority of the vehicle being trucks and the thousands of employees of the Logistic Center.

Response 1:

The analysis of impacts to Cactus Avenue from additional traffic generated by the WLC project was provided in Section 4.15 of the DEIR and supported by the original traffic study as well as the revised study that was provided with the Final EIR (Appendix K). Both of those studies evaluated Cactus Avenue and identified approximately 14,400 vehicle (not truck) trips that would utilize this road after buildout (end of Phase 2) of the WLC project while approximately 9,700 vehicle trips would occur by completion of Phase 1. This volume of traffic is within the capacity of that roadway and is included in the City's General Plan Circulation Element, as well as being addressed in the City's General Plan EIR. It is important to note this traffic will be passenger vehicles by employees coming to and from the WLC project, and no trucks will be allowed on Cactus Avenue from the WLC project. The cited traffic data is from the FEIR Volume 2, Appendix K, Traffic Impact Assessment (TIA) dated September 2014, Table 36 (Existing Plus Buildout), TIA page 146, and Table 50 (Existing Plus Phase 1 for Year 2022), TIA page 215.

In addition, Section 3.3.1 of the Specific Plan states that “Cactus Avenue and Redlands Boulevard south of Eucalyptus Avenue are not designated Truck Routes” and so will be signed accordingly (FEIR Volume 2, Appendix H-1, page 3-2).

Comment 2:

The majority of these trucks will not meet emission standards of 2010 as is stated in the report because they are independent truck owners and/or trucks from out of state who would care less about the environmental studies. The 2010 standards for diesel trucks would be impossible to impose on out of state truckers and local independents. Do you really think that truckers would care about these standards that you wish to impose. They would just not do deliveries to the logistic center but they will be delivering to the rest of Moreno Valley.

Also the City has problems enforcing "No Trucks Over 5 Tons" on various city streets now. With that said trucks would exit at the 215/Cactus exit and take the simplest route to their destination because of the amount of traffic on Cactus Air quality would totally be detrimental to all residents because of this traffic. There are so many stops signs, now, on Cactus avenue that trucks using this route would be idling for minutes at each stop. Think about it, thousands and thousands of vehicles daily on Cactus Ave idling waiting to go to and from the Logistic Center. Also, the reports call for the building of soundwalls, which would be ineffective and very expensive to build along with the improvements needed on Cactus Ave. for widening of the street. Who will pay for all of these improvements? The Developer is expecting the City to make these improvements at the cost of hundreds of millions of taxpayers money.

Response 2:

The comment regarding older diesel trucks does not apply to the WLC project because the WLC project prohibits such trucks. (WLC Project FEIR, Volume 3, p. 4.3-97, Mitigation Measure 4.3.6.3B(1)) The fact that other projects continue to rely on such trucks has no bearing on the environmental impacts of the WLC project. The WLC project will provide increased property tax revenues for City services such as police to cover any additional costs related to enforcement or policing of existing traffic and other laws, including trucks illegally using non-truck routes. The fiscal assessment for the project indicates it will have a surplus of revenues over costs (FEIR Volume 2, Appendix O), and each future development will pay the Development Impact Fee for police services.

The analysis of impacts to Cactus Avenue from additional traffic generated by the WLC project was provided in Section 4.15 of the DEIR and supported by the original traffic study as well as the revised study that was provided with the Final EIR (Appendix K). Both of those studies evaluated Cactus Avenue and identified approximately 14,400 vehicle (not truck) trips that would utilize this road after buildout (end of Phase 2) of the WLC project while approximately 9,700 vehicle trips would occur by completion of Phase 1. This volume of traffic is within the capacity of that roadway and is included in the City’s General Plan Circulation Element, as well as being addressed in the City’s General Plan EIR. It is important to note this traffic will be passenger vehicles by employees coming to and from the WLC project, and no trucks will be allowed on Cactus Avenue from the WLC project. The cited traffic data is from the FEIR Volume 2, Appendix K, Traffic Impact Assessment (TIA) dated September 2014, Table 36 (Existing Plus Buildout), TIA page 146, and Table 50 (Existing Plus Phase 1 for Year 2022), TIA page 215.

DEIR Section 4.12 examined potential noise impacts and proposed soundwalls at various locations to help reduce noise impacts on sensitive receptors. DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including traffic on local roads and freeways. The EIR determined the project would have significant traffic and noise impacts even with mitigation (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project’s benefits outweigh its anticipated impacts.

Comment 3:

This would relieve the Developer of making the improvements on the 60 freeway. The City has already done this once for the Aqua Bella Development? What had that gotten the city???? Nothing!!! but a \$75 million expense

of taxpayer dollars. The Developer could now sell this land for much greater profits and do actually nothing because all the infrastructure improvements have been made. There is nothing in the General Plan nor the Specific Plan to show the building of a Cactus Ave. extension, only a tract of residential homes for the northeast corner of Cactus and Redlands. This affect not only the east side of Moreno Valley but also the west end of Moreno Valley and all of the rest of Moreno Valley including the center of our city. This is not a west vs the east problem but a citywide health and noise problem Mr. Benzeevi spent a lot of time showing us his video and making comparisons of monuments to other great cities such as the Eiffel Tower of Paris. The only monument I can envision is the GRIM REAPER saying Welcome! Without true and accurate environmental impact studies, the Warehouse Logistics Center cannot not be approved. I also feel that there are conflicts of interests going on and Mr Benzeevi's financial or equitable interests are being misstated and I am asking for the State and County Attorney Generals to further look into this matter.

Response 3:

Section 4.8 of the Development Agreement requires Highland Fairview to mitigate all traffic impacts with the City. Section 4.15 of the EIR identifies the potential traffic-related impacts of the WLC project, including local roadways and freeways, and proposes a number of mitigation measures such as installing certain improvements, and paying the County's Traffic Uniform Mitigation Fee (TUMF) for regional improvements. The EIR determined the project would have significant traffic impacts even with mitigation (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The EIR identifies impacts to SR-60 and recommends mitigation, but implementation of any mitigation for freeway impacts is not under the control of the City (i.e., Caltrans) so these impacts are considered significant.

Cactus Avenue is already planned in the City's General Plan to carry vehicular traffic between the east side of the City and the I-215 freeway (not including trucks – it is not a designated truck route). The WLC project would utilize Cactus for project-related vehicular traffic (not trucks) consistent with the General Plan.

The EIR documents reflect unbiased objective information on the WLC project and its potential impacts on the natural and man-made environment, based on a number of detailed technical studies that were prepared using the most current regulatory and industry standard guidelines for the preparation of such reports. The rest of the comments do not address the EIR - they are personal opinions which are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Dennis Sibley (June 23, 2015) Emailed Letter

Comment 1:

I am a resident of Moreno Valley since 1986. I support the World Logistics Center. Unlike housing or tax supporting projects, the World Logistics Center, a for profit endeavor, will increase tax revenues that will outpace the strain on current services that other projects will create. I request the World Logistics Center be approved.

Response 1:

Comment noted. The City will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

Daniel Peeden (June 11, 2015)

Comment 1:

The World Logistics Center FEIR and Development Agreement need to be recirculated to the public. We have not had adequate time to review these documents. Furthermore, recommending such a project to our City Council for a vote is irresponsible. The city has not held public workshops to go over all of the potential impacts this project will have on the residents of Moreno Valley now and in the future.

Response 1:

The City released the Final EIR materials on May 1, 2015 with 41 days before the first Planning Commission hearing on June 11, 2015, and additional hearings with the Commission and City Council are planned before action is taken on the WLC project. We refer the commenter to the Development Agreement which contains 26 pages (the document also contains exhibits with the legal description of the property covered by the Development Agreement and additional pages for the notary), was provided to the public on June 1, 2015 immediately after City staff had finished negotiating its contents with the applicant. Adequate time to review and comment on these materials, including the development agreement, has been provided before a decision is made on the WLC project.

Comment 2:

The staff report also features a letter from John Husing, who represents the Inland Empire Economic Partnership. The city has failed to state the conflict of interest in this letter. Highland Fairview CEO, Iddo Benzeevi sits on the board for this agency. Furthermore, John Husing has a special interest in the logistics industry, as he has many contracts to promote this industry to municipalities throughout the Inland Empire region. The positive economic impacts he states are false. I encourage each one of the planning commissioners to do their own research and speak with unbiased sources when determining what the economic consequences will be for Moreno Valley.

Response 2:

Dr. Husing is a well-respected economist and expert on the economy of the Inland Empire. His information, along with other fiscal and economic information was provided in the DEIR. The actual estimate of jobs and revenues from the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. However, these are only estimates based on information available at the time. The City Planning Commission and City Council will independently weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Comment 3:

The Inland Southern California region already has the largest concentration of warehouses in the United States. These warehouses have yet to produce the economic benefits Highland Fairview claims warehouses do. According to a Harvard Study, Riverside and San Bernardino County are ranked as some of the worst counties for economic upward mobility in the United States. The correlation between warehouse growth and the lack of economic upward mobility leads one to believe that they are casual as well.

Response 3:

The connection or correlation ascribed by the commenter is anecdotal and was not a conclusion of the Harvard study. The actual estimate of jobs, costs, and revenues from the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. However, these are only estimates based on information available at the time of study.

Comment 4:

I oppose the World Logistics Center project and I encourage the planning commission to also consider the opportunity cost for Moreno Valley. Thank you for your time.

Response 4:

The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Greg and Susan Billinger (June 23, 2015) Email**Comment 1:**

Dear Moreno Valley Planning Commissioners, We are writing to let you know that as long-time residents of Moreno Valley, we oppose the World Logistics Center where it is planned in a residential zone in District 3, and we are very concerned with the very vague Development Agreement between Highland Fairview and the City of Moreno Valley. The term used in the Development Agreement, "Fair Share," is a very vague term, as is another term used, "reasonable." The Development Agreement needs to be sent back to the drawing board for much more specific terms. Also, there is nothing in the Development Agreement that precludes Highland Fairview from holding much of the land for speculation for many years, or selling the land to a firm which wants to do something very different or damaging to Moreno Valley, for example, store and transport toxic substances that could spill on our 60 freeway and roads. The Development Agreement may cause us to get something very different from what is expected, and in fact it says right in the Development Agreement that the Development Agreement ITSELF can be changed!

Response 1:

The terms of the Development Agreement (DA) will have to be agreed to by both parties (i.e., the City and Highland Fairview) prior to final approval of the DA, including definitions of all terms. For example, the term fair share is well defined in terms of project impacts; "fair share" means that a project which causes X% of a given impact is responsible for the payment of X% of the cost of mitigating that impact. Any development or activity that could occur on the WLC site would have to be consistent with the WLC Specific Plan which only allows logistics development or light logistics development, and no heavy industrial uses which would be much more likely to involve hazardous materials. Potential impacts related to hazardous materials are addressed in EIR Section 4.8, Hazards and Hazardous Materials.

Comment 2:

We are also speaking of a very long period of time for a project. If the City of Moreno Valley goes ahead with this project (which we oppose as we sincerely believe it will turn out to be a huge, catastrophic mistake,) we believe at a minimum, it would be wiser for the City to instead to re-zone a smaller piece of land as needed, and give Mr. Benzeevi approval to build only one warehouse at a time, rather than committing all that land to one use at once, and so MANY YEARS IN ADVANCE of the actual building and use.

We feel the City of Moreno Valley is looking for a quick revenue source from property taxes from the rezoning of all the property from residential to industrial. Yes, that rezoning may increase the revenue from property taxes right after the rezoning, but at a terrible long-term price of irretrievably damaging the potential of the city to use the land for uses that would ENHANCE rather than destroy the quality of the city.

Response 2:

The WLC plan responds to the City's Economic Development Action Plan adopted by the city council in April 2013 which calls for improving the job to housing ratio in Moreno Valley. The City requested that Highland Fairview prepare a specific plan for the entire project area, including land not owned by Highland Fairview. It was intended that such a large assemblage of property for this single use would provide unique marketing and development opportunities to attract high end national or international scale corporate warehousing and provide the most benefits in terms of employment and revenue to the City while minimizing potential environmental impacts such as traffic compared to other types of land uses or the approved Moreno Highlands Specific Plan.

Comment 3:

Yes, the WLC buildings may be energy efficient, but that large of a number of huge warehouses and related big-rig trips on the 60-215 and city roads will be disastrous to the city. It will literally be a "Hot Mess," greenhouse gas and pollution from trucks, and hot glaring pavement where people are trying to live. People will leave and property values will fall.

Committing all the City's resources of the future to constructing and maintaining infrastructure for the warehouses and big-rigs for the World Logistics Center, for the onramps and offramps, roads, and water

use/treatment/the storm water pollution elimination system, (among other maintenance requirements,) will be so expensive that there will be no money left over for amenities for residents, which make a city a good place to live.

The infrastructure will be required not just in the project area, but FAR OUTSIDE of the project area. Our neighboring cities have already expressed opposition to the WLC, and will be very reluctant to help with any infrastructure. It will be an uphill battle to get funds to build and maintain infrastructure.

Response 3:

DEIR Section 4.3 examined various air quality impacts including cancer and non-cancer health hazards. DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including local roadway and freeway improvements. In addition, Section 4.9 addresses drainage, NPDES (water quality), and flood control improvements, and Section 4.16 addresses utility improvements. All of these EIR sections address both onsite and offsite improvements, and The EIR determined the project would have significant air quality and traffic impacts even with mitigation (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). In addition, the Development Agreement identifies the responsibilities for providing the infrastructure necessary to support the WLC Project. (i.e., roads, utilities, etc.). Per Development Agreement Section 4.8 and Mitigation Measure 4.15.7.4A, Highland Fairview will construct or pay for project-related roadway infrastructure improvements within Moreno Valley. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Comment 4:

The City of Moreno Valley does not have the revenue to construct this massive infrastructure. In fact the city does not have enough money to keep its own internal residential roads in repair. Many of those City of MV roads are in very poor condition, with pot holes and big rifts, especially in District 4 and 5.

Tax increases for the infrastructure for the World Logistics Center will be greatly opposed, whether it is Measure A, gas tax, property tax increases or utility user tax. Residents should not have to pay increased taxes for a project they do not want, and one that will vastly lower the quality of their lives with heavy traffic congestion. Most residents will resent a tax increase to pay for the WLC. Residents are still waiting for a new library from the funds that were supposed to give residents this small amenity (already spent.) The Riverside Transportation Commission has already publicly stated that they cannot get any more funds to widen the 60 freeway and there is a zero balance in the Federal Funds Account designated for work on our 60 freeway.

There is much opposition to this project from residents. Many residents I have spoken with do not feel comfortable coming to meetings and speaking openly, but they oppose the World Logistics Center.

Seemingly quick and easy solutions to monetary problems hardly ever work in the long-term. As I stated we want to enhance and improve our city, not cause it to deteriorate and property values fall and residents leave, similar to what happened in San Bernardino.

Response 4:

The study that estimated jobs, revenues, and costs related to the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. In addition, the Development Agreement identifies the responsibilities for providing the infrastructure necessary to support the WLC Project. (i.e., roads, utilities, etc.). For example, Mitigation Measure 4.15.7.4A requires Highland Fairview to construct or pay for project-related roadway infrastructure improvements within Moreno Valley. In addition, Mitigation Measures 4.15.7.4F and G require future development to pay its fair share of the cost of improvements outside of the City.

Regardless of whether residents support or oppose the WLC project, they can provide comments to the City in written form via email or letter if they do not wish to speak at public hearings. The rest of the comments do not

address the EIR for the WLC project - they are personal opinions which are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Comment 5:

The FEIR had wildly different estimates for jobs. Lately one job for every 4,000 warehouse square feet appears to be the most updated estimate according to BJ Patterson and other logistics experts. That would immediately reduce the estimated jobs to 10,000. However, the EIR says it could be as low as 8,000, and these jobs may not go to Moreno Valley residents despite anyone's best effort. Since this project is so far into the future, the number of jobs will be greatly reduced further by Robotics development. The tenants are unknown and will probably transfer jobs as they are going to do what is economically best for them.

You should vote NO on this project. Please send the Development Agreement back as inadequate. This project needs closer study and more definite specifications. Thank you.

Response 5:

The commenter is incorrect, the estimate of jobs outlined in the original DEIR and Final EIR are slightly different due to the fact the project was reduced by 1 million square feet, but otherwise the factors used to estimate jobs, costs, and revenues from the project have been the same (i.e., not wildly different). The estimate of jobs and incomes from the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. Each new use/user that moves into the WLCSP project area will be unique in terms of the number and type of jobs they bring to the area, including the level of automation or robotics.

The rest of the comments do not address the EIR for the WLC project - they are personal opinions which are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

H. Grady (June 25, 2015) Emailed Letter

Comment 1:

This Project will destroy Moreno Valley. It will convert a decades-old residential ("bedroom") city into the worst kind of urban blight in a few short months). There will be several thousand semi truck trips in and out of the City every day. Our side streets will be clogged with Semis, and Fwy 60 will become a death run 24/7. Your family will run with the Semis anytime they drive the 60; and your children will walk on side streets with Semis parked and/or cruising by; their health and safety at risk.

Response 1:

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including freeway traffic on the SR-60 freeway. The EIR determined the project would have significant traffic impacts even with mitigation (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Comment 2:

The major retailers not only use near new Semis, but also contract with independent truckers from all over the USA and Mexico which creates a policing issue. Truckers sleeping in their rigs; drugs, prostitution; semi vs. auto accidents.

Response 2:

The comment regarding older diesel trucks does not apply to the WLC project because the WLC project prohibits such trucks. (WLC Project FEIR, Volume 3, p. 4.3-97, MM 4.3.6.3B(1)) The fact that other projects continue to rely on such trucks has no bearing on the environmental impacts of the WLC project. The WLC Specific Plan has identified a number of internal streets that will have turnouts for truck parking if needed, and the WLC project will provide increased property tax revenues for City services such as police to cover any additional costs related to enforcement or policing of existing traffic and other laws, including drug use and prostitution. Traffic-related impacts of the project, including the potential for accidents, are addressed in Section 4.15 of the EIR.

Comment 3:

Now that the Benzeevi Three Stooges control the City Council, they will simply revise the General plan/Zoning on a piecemeal basis to add even more warehouses; truck trips, truck washes, truck repair, etc. eventually jumping the 60 moving East; quite literally gobbling up any and all undeveloped parcels...owned by?

Response 3:

These comments do not address the EIR for the WLC project - they are personal opinions which are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Comment 4:

This urban cancer will grow over time, and obliterate a residential City with great promise, into the City of Commerce, City of Industry; Mira Loma... take your pick. To the objective, ethical, thoughtful bona fide residents of the City of Moreno Valley who sit on the Planning Commission, stand up for your home, your family, your City. To those who are complicit in the WLC, a Mad Hatter's folly, because you believe you have a finger in the Benzeevi pie; shame on you; and may our home stand and family live in the shallow of a massive warehouse and all that encompasses.

Response 4:

These comments do not address the EIR - they are personal opinions which are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Multivac, Inc.-Charles Moothart June 25, 2015) Emailed Letter

Comment 1:

We have reviewed the documents for the above referenced project as shown on the City of Moreno Valley's website. Since the project Draft EIR was first circulated last year, we have found that the project has been redesigned in such a way as to mitigate our concerns about having such a large project in close proximity to our residential properties. The heavy use of landscape and wall screening, the use of cutoff luminaires for onsite lighting, the elimination of truck traffic on Redlands Blvd. And Cactus Ave. as well as the 250 foot setbacks of buildings from exiting residential areas, demonstrate that City staff and World logistics Center have put a lot of effort into redesigning the project and eliminating most, if not all, of the concerns that we had about this project. We want to express our support for the project and thank staff for the efforts put into this project.

Response 1:

The City thanks the commenter for his comments regarding changes to the WLC project that addressed the commenter's original concerns.

John Husing (May 21, 2015) Emailed Letter**Comment 1:**

See Attached Letter

Response 1:

The City thanks the commenter for his comments regarding employment and tax revenues he believes would accrue to the City as a result of the WLC project. In addition, the commenter makes comments about the use of the HEI ACES study regarding the project's impacts relative to cancer risks. The City will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

Fred and Margie Breitreuz (June 25, 2015) Email

Duplicate of Email sent June 11, 2015 by Margie Breitreuz

(see previous memorandum from LSA on responses to emails regarding WLC project)

Cherie Andrews (June 25, 2015) Email**Comment 1:**

These Warehouses will be a total detriment to Moreno Valley! Low paying jobs, major traffic problems!!!! Worse pollution!!! Keep this the way the city was to be, Ranch homes, open spaces for all to enjoy! How about a Costco, something we can use, nice restaurants! We want a city we can be proud of!

Response 1:

The environmental issues raised in these comments were addressed in detail in various sections of the EIR, including air quality in terms of dust and health risks (Section 4.3), noise (Section 4.12) and traffic (Section 4.15). The rest of the comment is anecdotal information or personal opinions that do not comment on the EIR and thus are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

Gary and Loveda Klann (June 25, 2015) Email**Comment 1:**

I urge you to save Moreno Valley by not approving the World Logistics Project. I do not believe anything about the supposed benefits are anything but propaganda. What is true is increased pollution, grid locked traffic destroying the environment and the wetlands and ruining the quality of life in Moreno Valley.

I am a long term resident of the east end and I now have to limit my outside activities due to poor air quality in the afternoon and it is getting noticeably worse for the last few years. I am sure if this project is allowed to proceed I will not be able to breathe at all our side of my house. Leave the east end to develop the existing rural/ag zoning as we were promised when we moved here in 1988.

Our sons work in warehouses in the local area. They are middle management and their salaries are \$40.00. Those under them make minimum wages. The amount of people who operate these warehouse is an average of 40-50 people. Automation does the rest. Not many jobs and no big salaries for bad air and congestion. Where is the payoff for Moreno Valley. There isn't one just a payoff for developers.

Response 1:

The environmental issues raised in these comments were addressed in detail in various sections of the EIR, including wetlands (Section 4.4), air quality (Section 4.3), and traffic (Section 4.15). The rest of the comments are anecdotal information or personal opinions that do not comment on the EIR and thus are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

The estimate of jobs and incomes from the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. However, these are only estimates based on information available at the time. It should be noted that on April 28, 2015, the City Council approved the formation of a "Hire MoVal Incentive Program" and Section 4.11 of the WLC Development Agreement outlines formation of a local hiring program consistent with the Hire MoVal program.

Marcia Amino (June 25, 2015) Email

Comment 1:

This is a second e-mail asking that the Planning Commission Vote NO on the WLC proposed General Plan Amendment, Zone Changes. I have included a couple of items of correspondence from tonight's PC agenda that illustrates some of my concerns about this proposed General Plan Amendment and Zone Change. Also included in this e-mail is the link to as well as part of today's article in the Press Enterprise re Traffic Issues that will result if the WLC is approved.

With the poor track record of this developer, Iddo Benzevi of Highland Fairview in not completing projects, with the corporate welfare from our city that has generously benefited this developer in the Aquabella Development Infrastructure, and with what appears to be a seriously flawed FEIR, it would appear that the best actions this Commission could take tonight or whenever the final vote for approval comes, is to vote No.

The Air Pollution Issues, Property Rights Issues in the WLC project sphere, as well as the now apparent lack of traffic mitigation measures for a project that WILL SERIOUSLY IMPACT NOT ONLY MORENO VALLEY BUT OUR ENTIRE REGION, should not be enabled to not only hurt the quality of life for Moreno Valley, but our Region overall. As the good stewards that I am sure you wish to be for our city and residents, it is apparent that approving this development will hurt health and safety of all of us here, thus, I ask that you vote NO on this project.

I am hopeful that you will take to heart, what has been my belief from since moving to Moreno Valley in 1988, and was beautifully stated in the in the SCAQMD letter, dated 6/24/15:

"The choice is not about promoting jobs OR promoting clean air. It is about promoting a future that provides both. It has been done before and it should be done for this project."

Response 1:

Development Agreement Sections 4.8 and 4.9 identify the responsibilities for providing the infrastructure necessary to support the WLC Project. (i.e., roads, utilities, etc.). In addition, Mitigation Measure 4.15.7.4A requires Highland Fairview to construct or pay for project-related roadway infrastructure improvements within Moreno Valley. The environmental issues raised in these comments were addressed in detail in various sections of the EIR, including air quality (Section 4.3) and traffic (Section 4.15). For additional information regarding air quality, see the Response Memo to the comment letter submitted by the SCAQMD.

The rest of the comments are anecdotal information or personal opinions that do not comment on the EIR and thus are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

Marina Smiley (June 25, 2015) Email

Comment 1:

I wish to register my strong opposition to this project and request that you recommend that the City Council deny each and every application. I have to admit that the presentation of the Logistic center was a piece of art.

It was the art of manipulation and the masterpiece of brainwashing. 1. The developer told us that the giant Logistic center will be able to save us billions gallons of water. But he never noted how many trillions gallons of water will be taken of our area, which already is severally suffering from the lack of water! So, never mind, how much the Logistic center is going to save, we want to know how much it's going to use?

Response 1:

DEIR Sections 4.9 and 4.16 evaluate the water-related impacts of the proposed WLC project, and it is important to note that warehousing using considerably less water than other types of land uses that have more intuitive landscaping requirements. In addition, the WLC Specific Plan outlines a specialized arrangement for drainage control and landscaping that will further reduce potential water use on the site.

Comment 2:

2. Next, we were shown the laughable picture of the empty 60 freeway ready to accept 14,000 trucks daily. I would like to ask Moreno Valley residents, have you ever seen our freeway empty? Me neither. The developer is the only person who was able to see it. Even now, if we want to drive somewhere, we are usually stuck in traffic of so the called "empty" freeway. I want the developer to explain how in the world we'll be able to drive anywhere, with an additional 14,000 trucks daily on this narrow freeway?

Response 2:

First, it should be noted the WLC project will generate 14,000 truck **trips** per day **not** 14, 000 trucks. The computer generated animated traffic simulation used a low background traffic level on the freeway so any traffic contributions by the WLC project could be more clearly seen. While it would be accurate, it would not be instructive to show WLC project traffic accessing the freeway at rush hour because the project generates traffic around the clock and does not have the standard "peak hour" trips currently experienced by commuting traffic on the SR-60 freeway. As indicated in the TIA, jobs in the east end of the City (like WLC) could help reverse the commuting traffic direction during peak periods on the SR-60 freeway.

Comment 3:

3. Now, let's discuss why the developer Razzle Dazzled us with the pictures of Paris and Sidney, but didn't tell anything about Cactus Ave that he plans to turn into a highway. Do you know why? Because he didn't want to spoil the party by revealing his secret plan of connection the Logistic center to Cactus Ave, and through the heart of Moreno valley to the 215 freeway. Now, all Moreno valley, including schools, nursing homes, and the senior citizen communities are going to suffer not only from the diesel cloud of 14,000 trucks, but additionally, from the pollution and noise created by approximately 20,000 cars and trucks of employees, traveling from 215 freeway along Cactus Ave (or any other streets of their choice, in order to escape traffic on Cactus Ave and the jammed freeway.)

Good job! The developer wants to make a living, but his living is going to kill us! It seems to me that the developer owns a Moreno Valley. Does he? We, the people of Moreno valley demand a full investigation of this proposed disaster. We, the people of Moreno valley demand to ELIMINATE any effort to expand Cactus into a highway connected to the Dead Diesel Zone of the Logistic center. We, the people of Moreno valley demand from the developer to expand the 60 freeway FIRST, before even offering us any projects, especially at the size of 700 football fields!

Response 3:

The analysis of impacts to Cactus Avenue from additional traffic generated by the WLC project was provided in Section 4.15 of the DEIR and supported by the original traffic study as well as the revised study that was provided with the Final EIR (Appendix K). Both of those studies evaluated Cactus Avenue and identified approximately 14,400 vehicle (not truck) trips that would utilize this road after buildout (end of Phase 2) of the WLC project while approximately 9,700 vehicle trips would occur by completion of Phase 1. This volume of traffic is within the capacity of that roadway and is included in the City's General Plan Circulation Element, as well as being addressed in the City's General Plan EIR. It is important to note this traffic will be passenger vehicles by employees coming to and from the WLC project, and no trucks will be allowed on Cactus Avenue

from the WLC project. The cited traffic data is from the FEIR Volume 2, Appendix K, Traffic Impact Assessment (TIA) dated September 2014, Table 36 (Existing Plus Buildout), TIA page 146, and Table 50 (Existing Plus Phase 1 for Year 2022), TIA page 215.

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including freeway traffic on the SR-60 freeway. The EIR determined the project would have significant traffic impacts even with mitigation (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

The Ortiz Family (June 25, 2015) Email

(Debra Coggins-Ortiz, Eduardo Ortiz, Patrick Coggins, Christopher Coggins, Vincent Ortiz, AlinaMari Ortiz)

Comment 1:

We have raised our children on the East End in Moreno Valley, and own a custom home just north of the 60 freeway. This is our third home in Moreno Valley. We moved here when there were just two stoplights, and the delicious aroma of orange groves permeated the air. Our first house was partially built, and we were so excited to watch the dream of our first home come true. We were so young! That was thirty years ago.

We decided to upgrade to a larger home a few years later. It was just down the road. From bare land, we eagerly watched as our new home was built over many months. Our Councilwoman, Bonnie Flicker lived in the tract around the block, but Moreno Valley was fast becoming the ghetto! It did not take long before our neighborhood became a not so nice place to raise children--a scary place to be. We had a boarded up two story foreclosed home behind us where gangs would hang out, and we could hear the sounds of gunfire frequently. In only five years we made the decision to move.

We moved to the east side in January of 1997 to escape crime that continued to grow in our neighborhood. When we moved here it was so quiet you could hear a pin drop in the evening. We would sit out in our front yards with the neighbors enjoying the quiet, the stars. They were unlike any stars we had ever seen. So many! At dusk we would go in the yard and watch the spiders spin huge circular webs, listen to the baby owls in the palm tree and watch the mother white owl fly above us. There was very little traffic on Redlands Blvd. and at night, there was no traffic at all. We would take walks to the hills and watch the bunnies and the horses. We loved it here! It was perfect.

Today, we can see the Skechers warehouse, as well as Mr. Benzeevi's home and winery, that is NOT located in Moreno Valley, from our driveway. Warehouse number two is almost complete. The lights from Skechers light up the sky and make the once beautifully visible stars difficult to see. When they were building the warehouse, truck after truck filled with dirt rode past my home, day in and day out for what seemed like an eternity. The exhaust from the trucks was overpowering in my front yard and in my back yard. The trucks make my windows rattle, and the floor tremble. Each and every time we were unsure if it was a truck, or an earthquake. That continues with each and every truck that drives by today! Redlands Blvd. is now a constant flow of traffic 24 hours a day ever since the regional hospital was built. We cannot enjoy a barbecue or a family event in my yard. We cannot enjoy swimming in our pool. I have at least thirty trees that try to clean the air, but to no avail. There are hundreds, if not thousands of birds in my trees and gardens, but their beautiful chirping is drowned out by the sound of traffic. I have to leave my doors and windows closed all the time. Our beautiful dog succumbed, at the young age of three, to a fungus that is created when construction turns over the soil. Did the Skechers construction do this? Is this fair to us? It was our dream to live here, and it is being chipped away piece by piece. Don't we deserve to be happy--to enjoy our home that we worked so hard for? To pass it down to our children? This is where they grew up! Their childhood home! Had we been informed of this at the time we purchased this home, we would NOT have settled here! Should the City's motto be "Greed Over Health" because the impact of these warehouses cannot be mitigated?

We do not CHOOSE to live amongst a World Logistics Center, and if you CHOOSE to force this upon us, we will be forced to do whatever it takes to protect our home. You do realize that you have the power to decide whether children will become ill from diesel exhaust? Whether the wildlife will be harmed from thousands of truck trips a day? Whether you will be ruining the neighborhoods with noise pollution and deadly air quality, and sicken Moreno Valley Families--those that have lived and shopped here for years? Do you realize that its people are what makes a city great, not how many and how big its warehouses are? You should be answering to us and not to one man that does not even live in Moreno Valley!!! You do know he lives in an unincorporated area of Riverside County? HE DOES NOT EVEN HAVE THE DECENCY TO LIVE IN THE CITY HE WISHES TO RULE AND DESTROY.

Please make the right decision, because if we do not have our health, we have nothing. All the money in the world will not reverse Cancer, emphysema and birth defects. However, if you do decide to give our money to Mr. Benzeevi and the World Logistics Center, we ask that you buy out every single home on the East side, both north and south for the amount it would take to relocate to any place of our choosing. For us, that means a home with acreage and a beautiful stone pool, far enough away to not breathe the pollution these warehouses will create.

Response 1:

The environmental issues raised in these comments were addressed in detail in various sections of the EIR, including biological resources (Section 4.4), air quality in terms of dust, cancer, and non-cancer health risks (Section 4.3), noise (Section 4.12) and traffic (Section 4.15). The rest of the comments, such as where the developer lives, are anecdotal information or personal opinions that do not comment on the EIR and thus are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

Therese Bailey-Nelson (June 25, 2015) Email

Comment 1:

I am a resident of Moreno Valley and am strongly opposed to this project. There is NO WAY this project will benefit our city and likely will lead to city wide problems that MUST BE ADDRESSED! (The anticipated problems are increase taxes to our citizens for infrastructure the developer will demand or fails to deliver as represented, decrease in the quality of life for ALL due traffic and health issues caused by the increase traffic, few if any jobs generated contrary to the "projected 20,000 #" thrown around without factual support or tenant disclosure or affirmation any jobs will be available from anyone who may be a tenant, thus making the # speculative at best and illusory at worst.) Without tenant disclosure there are NO REAL JOBS to be used to balance the benefit verse cost to support this project or approval of a general plan change.

Response 1:

The Development Agreement identifies the responsibilities for providing the infrastructure necessary to support the WLC Project. (i.e., roads, utilities, etc.). Per Development Agreement Section 4.8 and Mitigation Measure 4.15.7.4A, Highland Fairview will construct or pay for project-related roadway infrastructure improvements within Moreno Valley.

The environmental issues raised in these comments were addressed in detail in various sections of the EIR, including air quality in terms of dust, cancer, and non-cancer health risks (Section 4.3) and traffic (Section 4.15). The estimate of jobs from the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. However, these are only estimates based on information available at the time. It is true the developer does not have specific tenants identified at this time, but for a project of this size, it was reasonable to use regional averages for job generation assuming the mix of uses would average out over time (i.e., high vs. low numbers of employees, automation vs. human labor, hours of operation, etc.).

The rest of the comments are anecdotal information or personal opinions that do not comment on the EIR and thus are not part of the CEQA process. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

Comment 2:

Any resident that is on the road in our city by 7am knows there are numerous traffic issues which will be compounded if this proposed plan to develop a logistic center of this size in this location is in fact approved. There are no legitimate offers to offset the negative impact this project would have on our city and the greater Inland Empire, with regard to the increase traffic congestion. Thus all traffic on our road ways will come to a halt. How will this impact the business we already have? Will they leave? Will this traffic nightmare actually cause loss of jobs because the current employers in our city pull up stakes for less congested areas?

Response 2:

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including local roadways and the SR-60 freeway. As indicated in the TIA, jobs in east end help reverse the commuting traffic direction during peak periods on the SR-60 freeway. The EIR determined the project would have significant traffic impacts even with mitigation (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

There is no evidence that existing employers or uses within the City would relocate as a result of approval and subsequent future development within the WLC project.

Comment 3:

Secondly, the increase in traffic will have an extremely negative impact upon our citizens health. The increase smog and carbon in the air will cause our children, elderly and in-firmed to become ill and possibly suffer increase medical bills due to the poor air quality the increase traffic will produce in our city. Who will ultimately pay for this by product of the project? How are these concerns being addressed by the developer?

Response 3:

DEIR Section 4.3, *Air Quality*, examines the potential impacts of the project relative to criteria pollutants and health risks, including cancer and non-cancer effects. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The EIR contains a variety of mitigation measures that reduce potential air pollutant impacts to the degree feasible, including a requirement for all Tier 4 construction and operation trucks (Mitigation Measures 4.3.6.2A and 4.3.6.3B, respectively). The EIR examined the air quality impacts of the WLC project to the degree outlined under CEQA, but the assignment of any of responsibility for regional air impacts, of which WLC is only a part, is beyond the scope of this EIR. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 4:

Number three, if the developer knows or believes the development will generate 20,000 jobs he must also know who the tenants of the development are or will be. If this is the case the alleged tenants should be disclosed, so the information can be utilized for a more accurate assessment can be rendered regarding the traffic and congestion the tenants will actually generate. Rather we are supposed to compare this project to future home development that is not even a possibility in the current economy. Such a comparison by the developer is hog wash. If there is to be a comparison to be made regarding traffic, it should be the current status (vacant land) versus the proposed project and the projected traffic.

There is NO OFF SETTING benefit for the people of Moreno Valley generated by this project and therefore no reason to alter the current general plan to accommodate this PIGS EAR being marketed as a SILK purse.

Response 4:

The commenter is correct that, at this time, the developer does not have specific tenants for the WLC project. The estimate of jobs was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. It is assumed that a project of this size would eventually reach a mix of uses similar to that observed at the regional level, however, each new use/user that moves into the WLCSP project will be unique in terms of the number and type of jobs they bring to the area, including the level of automation or robotics.

The EIR used the difference between existing (vacant) conditions and full development of the WLC project to determine the significance of environmental impacts under CEQA. The information regarding the Moreno Highlands Specific Plan was provided for information only as that outlines the currently approved land uses for the WLC property if the WLC project is not approved.

Corinne Orozco (June 29, 2015) Email

Comment 1:

I recently sent the Planning members an e-mail about job creation in Moreno Valley, and I never received a response from one member. After attending Thursday's meeting, and my first encounter listening to Ido Benzeevi, the developer, now I see a clearer picture of the warehouse situation I hadn't seen before.

Job creation is not the primary issue, it's appeasing and bias towards Benzeevi. Benzeevi is a man who made a very bad real estate investment. He thought he could convince UCR, Kaiser, etc. to work with him on a medical project, they were not interested, and after Thursday I can see why.

Benzeevi does not have a good track record, or experience to take on any big project, especially the size of World Logistics. Thursday, he was unintelligible, rambles on, orchestrated pro-logistic attendees, and stated, he worked on the Spectrum, Irvine. Obviously, he did not, the Irvine Co. is the developer. Maybe the planners should have asked him, what did you do, were you a subcontractor? His slide show was a copy of pretty pictures, with maps that clearly showed its landlocked for such a project.

The Planners did not ask hard questions, about traffic or CO2 emissions, only snapped at an air quality speaker with quality information they should take serious. It's about the quality of health.

No hard questions about his past projects and how does he expect to fill the buildings. Our economy is not strong enough in gross national product, It fell -7 last month.

The Skeechers building he is responsible for he barely got by since his General Contractor left and did not pay his sub-contractors. Benzeevi had to rely on his insurance bond to pay and eliminate lawsuits. Speaking of lawsuits, Skeechers will have to pay out in 2015 for falsifying Uplift shoes, and recently the Skeechers Riverside store closed down. There could be a chance Skeechers will downsize.

Also, Warehousing positions are nonunion, part-time, and are temporary positions and they do not justify self-reliance economically.

Fact check Amazons work policies.

I ask myself how could anyone take this man serious with such a grandiose project without reading the EIR. So I have questions for the planners:

Did you read the EIR?

Do you have a list of potential parties? With fact checking?

Do you have Benzeevis professional biography with fact checking?

I hope this time I will get a response.

I had sent you information about a legitimate developer who is acknowledged world wide on solar, usawestech.com, Mr Wally Jiang.

Presently, he is negotiating with Governor Perry in Texas to build a solar city. It's a good story, about creating jobs if all entities are tied in. It's a story about self-reliance, green energy, saving water, a training center, a factory, a mall, solar housing, mandating solar, and other community resources. It's a plan where employees, and subcontractors would feel comfortable about wages and legitimacy.

Thank you for your interest in Moreno Valley and our environment and health.

Response 1:

The environmental issues raised in these comments were addressed in detail in various sections of the EIR, including air quality in terms of dust and health risks (Section 4.3) and traffic (Section 4.15). The actual estimate of jobs, costs, and revenues from the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. However, these are only estimates based on information available at the time of study. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

The rest of the comments are anecdotal, information about other projects, or personal opinions that do not comment on the EIR and thus are not part of the CEQA process.

MEMORANDUM

DATE: June 24, 2015

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Responses to Email Comments from Various Persons up to June 22, 2015**

In a number of emails received on or before June 22, 2015, various residents submitted comments on the WLC Project FEIR. The specific comments are presented below, followed by responses to each comment.

Catherine Fortin (June 11, 2015)**Comment 1:**

Please vote NO to the zone change re the World Logistics Center. I bought my retirement home in 2002 in Moreno Valley near Cactus & Redlands. Please do not build the massive big box buildings. Isn't there some sort of compromise with the developer? A mix of residential, office buildings, parks, and just a few of the storage buildings???

Response 1:

The WLC plan responds to the City's Economic Development Action Plan adopted by the city council in April 2013 which calls for improving the job to housing ratio in Moreno Valley. The DEIR did examine a number of alternatives, including:

- No Project/No Build Alternative;
- No Project/Existing General Plan (Moreno Highlands Specific Plan);
- Alternative 1: Reduced Density (29 MSF or 30 percent less logistics warehousing);
- Alternative 2: Mixed Use A – Warehousing/Business Park/Office/Commercial;
- Alternative 3: Mixed Use B – MHSP with logistics warehousing; and
- Alternative Sites: Moving the project to some other available site.

Every one of these scenarios provides a mix of impacts and benefits. The City will weigh the various impacts and benefits of the proposed WLC project before making a decision on the project.

Dorrie Royce (June 9, 2015)**Comment 1:**

The World Logistic Center would significantly lower the quality of life in Moreno Valley and the Inland Empire with increased pollution and traffic and result in lower property values. It will grossly enrich the few and be demoralizing and detrimental to the vast majority of the citizens. It is not necessary to sustain the economy of Moreno Valley, and can only proceed based on greed and deliberate misrepresentation. Approval by the elected officials of Moreno Valley would be unconscionable.

Response 1:

The WLC EIR examined the potential impacts of the WLC project, including air quality and traffic, and determined the project would have significant impacts regarding those two issues. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Donovan Saadiq (June 5, 2015)**Comment 1:**

This development agreement with over 700 pages is too convoluted and too confusing to be read and digested in less than a week! From my reading it also leans too far to the developers side with the residents being on the hook for infrastructure. I am trying to read and understand this the best I can in the time given. I am an educated man, but even I need time to digest and decipher what the real meaning of what this agreement is about.

I am asking that the council and city please delay and give more time for the residents to read and grasp what has been agreed to and what we would have to pay for. A week is not enough time to get enough feedback from residents so that you can make a decision on what the residents want and the way this is written you would have to be a speed reader to read it in the time given before it gets to the governing boards. Please consider a delay to give fair review by the citizenry and the governing boards. (Planning commission/ City Council) Thank you.

Response 1:

The City released the Final EIR materials on May 1, 2015 with 41 days before the first Planning Commission hearing on June 11, 2015, and additional hearings with the Commission and City Council are planned before action is taken on the WLC project. We refer the commenter to the Development Agreement which contains 26 pages (the document also contain exhibits with the legal description of the property covered by the Development Agreement and additional pages for the notary). The commenter has adequate time to review and comment on these materials, including the development agreement, before a decision is made on the WLC project.

Edd Williams (May 28, 2015)**Comment 1:**

I am a college professor here at Moreno Valley College on Iris and Lasselle and have been here since January 1994 – more than 21 years. I thus have seen a considerable amount of new construction, from tract homes to business centers and recent projects like the large tilt-up manufacturing-type/storage-type buildings on Iris near March Air Force Base and those along the 60FWY corridor. I have seen the steady increase of cars, traffic lights, road and freeway congestion, and the inevitable smog that comes with industry and growth.

I think the word “inevitable” deserves special attention. New development is indeed inevitable, and if it doesn’t occur in the greater Moreno Valley area, it will take place somewhere else nearby like Beaumont or Banning or other areas. Yes, I understand the environmental concerns; I have plenty of colleagues who frantically criticize recent close-by developments like the one you are overseeing.

But I must take this time to voice my support of your development and eagerly await the outcome of the public hearings.

I realize recent public hearings have somewhat reduced local long-term development plans, so whatever plans might have happened in Moreno Valley will – it is inevitable – end up in a close-by town, and Moreno Valley will have lost many jobs and future homeowners and renters who will buy their homes or rent their houses and apartments in some other town. How a city like Moreno Valley grows – indeed that’s important and deserves careful scrutiny. But growth is going to happen; otherwise, stagnation will settle in like a bad odor in a lifeless canyon. Our area needs and deserves more industry, more technology, more manufacturing – in short, more jobs that will help our local residents improve their lives and way of living. Those who are willing to work may very well find jobs close to home, that is, if our local residents are willing to invest in our local area.

Response 1:

The project’s impacts and benefits will be evaluated by the City’s Planning Commission and City Council prior to making a decision on the project.

Erik Wulf (June 8, 2015)**Comment 1:**

I'm all for it. I believe it's another way to use our land other than Residential and help Create jobs for the citizens.

Response 1:

Comment noted. This comment does not address the EIR – it is a personal opinion that is not part of the CEQA process.

Frank Huddleston (June 8, 2015)**Comment 1:**

We need WLC. We need jobs, jobs and more JOBS. This would be great for the city. It would put us on the map again. The money that it would create. Upper class jobs. The value of our homes would go up. Just look at the unemployed people here. So lets start building, and move FORWARD and not backwards.

Response 1:

Comment noted. None of these comments address the EIR - they are personal opinions which are not part of the CEQA process.

George Hague (June 11, 2015)**Comment 1:**

I have been receiving many excellent letters which were sent to the City in regards to the WLC. The last one was from Earth Justice on behalf of the Center for Community Action and Environmental Justice (CCA EJ). This 22 page letter with about 30 pages of excellent attachments needs to be read by you all as do the many other letters/emails you have received prior to any vote.

With almost three hours of presentations on the WLC before the public hearing begins where the public talks, you should begin the hearing by telling those in the audience that a second hearing has been scheduled forso they do not have to wait until 11 p.m. to know this.

The notice on the WLC's Final EIR said we had 45 days following May 1st to make comments. That would be Monday June 15th. I would expect additional letters for your consideration will be coming in next week and your vote should not take place until you have read them all.

Response 1:

The City will prepare detailed responses to the comments in the letter submitted by Earth Justice and other conservation organizations.

Gary Hayes (June 11, 2015)**Comment 1:**

I would like to voice my full support for World Logistics Center. This project will bring many good paying jobs to Moreno Valley and will bring much needed revenue to our city. I have been a resident of the city for 29 years and would like to see us bring in this type of project so we can grow and become a first class city that we are capable of being. We need to make the city more than a bedroom community that it has always been.

In November we had an election of council members and the people spoke now there are those who are trying to recall all of those elected by the people. If there are some who don't like who was elected they have the opportunity next election to vote them out. That is the way the system works. Recalls cost money and those funds could be better used in many other places. It appears that there are some who if they don't get there way they must recall and the majority has spoken.

Response 1:

Comments noted. None of these comments address the EIR - they are personal opinions and are not part of the CEQA process.

Jim Baylor (June 11, 2015)**Comment 1:**

The people need to have access to all the information so we can vote intelligently on this project. Anytime someone says ..."it's too complicated for the voters"... is an indication that there's something that is not entirely ethical, moral about some aspect of this project. Don't refer to the voters, the people who make this city/county/state/country what it is through the democratic process of one person one vote. I'm concerned, as well as all citizens should be, about the increase in traffic - rail, highway, air and the ramifications it will have on the community, pollution, congestion of all types. I don't see the infrastructure robust enough to control the anticipated increase of general activity. The people need accountability when the motivation is money, the justification for the sacrifices necessary to be made by the community. Jobs are being promised? 20,000 and billions of dollars into the city/county. We the people need to hear about all of that. What kind of jobs? Good paying middle class jobs with benefits like retirement, health care, and of course proper and fair wages, not part time warehouse jobs for minimum wage and therefore no benefits. Workers will need the collective bargaining rights afforded to all American workers so that there are some assurances that a viable sustaining living can be realized. We need accountability. What will the additional income of money to the area be used for? Community improvements? Infrastructure modernization? Being transparent and accountable with real metrics even projections. Or will it be stuffed into the pockets of politicians and corporate executives and bankers? Where is all the goods coming from and going to that will pass through this mammoth size warehouse? Will they be American goods? or mostly goods manufactured from sources that have outsourced the millions of American jobs over the last couple of decades? We need manufacturing jobs in America. We need jobs that will pay a middle class wage so the products can be purchased by the workers and in so doing will grow the economy. I know that's a lot of information but don't make the people sound so dumb as to not be able to comprehend the complexities of the project. When you insult people like that you put yourselves on a pedestal, insinuating that you, this council, that is going to make all the decisions, is so much smarter than the average worker and voter that the people couldn't possibly make an informed, intelligent decision. So we should just trust you and basically accept what ever happens, whether it's good for the people or not? If this has anything to do with the Trans Pacific Partnership - with all it's secrecy, and the disregard for the workers, the environment, lack of regulations, corporate decisions for their profits, over and beyond what the rights and needs of the people. Then the people should know about all the details, before it happens, in all fairness. Thank you...

Response 1:

The WLC EIR examined the potential impacts of the WLC project. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts.

Mr. Whitehead (June 11, 2015)¹**Comment 1:**

Mr. Whitehead stated he moved out of Moreno Valley. He stated Council can't justify building the WLC, and Moreno Valley doesn't have the infrastructure, and now Highland Fairview wants the City to pay for the infrastructure. He stated the roads are already dangerous. He stated when he saw what was being done to the city, he moved out of Moreno Valley. He stated the people of Moreno Valley should be the ones to vote on the project, not City Council. Mr. Whitehead stated all the Council Members are crooks. He stated he would like to speak to the Council Members, but he doesn't believe anyone will call him back.

¹ Note in an email forwarded from Juliene Clay

Response 1:

The Development Agreement identifies the responsibilities for providing the infrastructure necessary to support the WLC Project. (i.e., roads, utilities, etc.). In addition, Mitigation Measure 4.15.7.4A requires Highland Fairview to construct or pay for project-related roadway infrastructure improvements within Moreno Valley.

The WLC EIR examined the potential impacts of the WLC project, including traffic, and determined the project would have significant traffic impacts. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. Other comments presented do not address the EIR but are personal opinions which are not part of the CEQA process.

Jerdon King II (June 10, 2015)**Comment 1:**

I have questions about this project: 1. What streets will handle 20,000 cars a day, plus delivery trucks? 2. How will 20,000 jobs at \$12.00 an hour (average wage of warehouse workers) increase the value of my home?

Response 1:

First, the WLC EIR examined the potential traffic impacts of the WLC project and outlined to what degree specific roads and intersections would be affected by project traffic, including delivery trucks. Ultimately, it determined the project would have significant traffic impacts even with implementation of the proposed mitigation as not all of the needed improvements could be made as needed due to physical limitations or the City (as the lead agency) could not guarantee the needed improvement could be made (i.e., they were located within other jurisdictions)(FEIR Volume 3, Revised Draft EIR, Table 4.15.BB, page 4-15-239).

Second, the WLC EIR examined the potential environmental impacts of the project as required under CEQA, however, CEQA does not require the analysis of effects on property values as a result of a proposed action. In general, property values tend to increase as surrounding vacant land develops, regardless of what type of development occurs. In addition, an estimated 20,000 jobs would result in a significant contribution to the local economy and improve the City's jobs/housing balance (FEIR Volume 1, Response to Comments, Response E-2-26, page 295, and FEIR Volume 3, Revised DEIR, page 4.15-49). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Jerdon King II (June 11, 2015)**Comment 1:**

Could you please address these concerns? The World Logistics Center is front and center in our city again. There are questions your voters have about the traffic. WLC says 20,000 jobs. That means at three shifts equals 6666 people per shift. More than that if its not three shifts. That means at shift change there will be 13,333 commuters on the streets of Moreno Valley. What freeway on ramps and off ramps will handle this amount of traffic, what SPECIFICALLY are the plans to handle this traffic flow.

Response 1:

The WLC EIR examined the potential traffic impacts of the WLC project and outlined to what degree specific roads, intersections, and freeway ramps would be adversely affected by project traffic. Ultimately it determined the project would have significant traffic impacts even with the implementation of the proposed mitigation as not all of the needed improvements could be made as needed due to physical limitations or the City (as the lead agency) could not guarantee the needed improvements could be made (i.e. they were located in other jurisdictions) (FEIR Volume 1, Mitigation Monitoring and Reporting Program, Mitigation Measure 4.15.7.4E, MMRP page 68).

Kathleen Dale (June 10, 2015)**Comment 1:**

On the first matter, the City's first public disclosure of the Development Agreement dated June 3, 2015 was made late in the evening on June 4, 2015 with posting of the Planning Commission agenda on the City's website. Moreno Valley Municipal Code Sections 9.02.110(D)(2) and 9.02.200 require a minimum 10 days public notice of the Planning Commission review. This requirement has not been met and the Planning Commission hearing must be postponed until the required notice has been provided.

On the second matter, I understand your office has been made aware of biased activities by Planning Commissioner Meli Van Natta through her role as a neighborhood lead in the City's Next Door social media platform. I have also seen numerous postings on other social media sites in which this commissioner has publicly expressed a favorable bias toward the World Logistics Center project. These activities are just cause for her dismissal from the Council and warrant immediate action to that effect.

In addition, Commissioner Van Natta owns and operates a real estate business in the WLC project area. Review of the Rancho Belago Realty website this morning revealed two active listings in the immediate proximity of the WLC project boundaries - one on Gifford Avenue and one on Muirfield Street. If the City continues to ignore the substantial basis for dismissal of Commissioner Van Natta noted above, surely these obvious economic interests in the WLC project influence area are reasons for declaration of a conflict of interest and her recusal as to the WLC.

Considering the hearing scheduled for tomorrow, time is of the essence in these matters. Your prompt and considered reply is requested and warranted.

Response 1:

First, the Commission addressed the issue of noticing at its June 11 hearing and determined adequate notice had been given regarding the WLC project and the development agreement for the purposes of the Commission's deliberations. Second, the commission continued its hearing to June 25th which allows the public an additional 14 days to review the development agreement. Other comments presented do not address the EIR but are personal opinions which are not part of the CEQA process.

Lindsay Robinson (June 10, 2015)**Comment 1:**

I attended part of last night's council meeting and one speaker mentioned that city rules/regulations (not sure correct term) require that there be 10 days for review of the development agreement before it goes to Planning Commission. Would you please verify if this is true and if so why is it going to the Planning Commission before 10 days? It is a very large document and doubtful that most of the commission and council have been able to study it carefully in such a short amount of time. A project of this magnitude that will be gambling with our health, well being and quality of life not to mention destroying our dreams and investments should require the maximum scrutiny possible and not be rubber stamped through. If the rule/regulation requires 10 days minimum than Thursday's Planning Commission meeting should not include the WLC development agreement.

While I have your attention I also am deeply troubled that the 8 staff members who recommended this project be approved do not live in Moreno Valley. I'm not sure how long most of them have been on the payroll, but do know that Mark Gross was and he worked with us on the FINAL build out plan for Moreno Valley which included very detailed wording on the animal keeping areas. The FINAL build out plan was well balanced and afforded diversity of jobs and allowed the east end to remain rural. A promise was made to the residents and other groups when this plan was adopted. The FINAL build out plan was also in place to prevent what is happening now with this WLC rezoning request. Progress is having a well balanced community not paving everything over.

Response 1:

The Commission addressed the issue of noticing at its June 11 hearing and determined adequate notice had been given regarding the WLC project and the development agreement for the purposes of the Commission's deliberations. In addition, the City released the Final EIR materials/documents on May 1, 2015 with 41 days before the first Planning Commission hearing, and additional hearings with the Commission and City Council are planned before action is taken on the WLC project. The commenter has adequate time to review and comment on these materials, including the development agreement, before a decision is made on the WLC project. Other comments presented do not address the EIR but are personal opinions which are not part of the CEQA process.

Lindsay Robinson (June 11, 2015)**Comment 1:**

Just in case you aren't following the comments in the Press Enterprise- the following was from the Warehouse Vote not going to the public article. Very well written and says what so many of us have been trying to articulate to you all. More transparency and details are needed. Mr. Benzeevi has a poor track record on delivering what is promised and the current development agreement is so vague he will be able to wiggle out of so many of the issues leaving taxpayers to foot the bill and all the negative impacts. Are you following the law by bringing this forward to the planning commission before 10 days of review? Don't gamble with our health, well being and quality of life so that a "developer" with investor money can get richer. He promised us high end homes and business park when he obtained the renaming of the east end to Rancho Belago - make him keep that promise. He promised a beautiful senior development and performing arts center with Aquabella which later changed to a medical corridor and he got a road thru his property- make him keep that promise before you destroy the east end. Anyone who thinks it's a good project for that location doesn't know the city very well nor understand the damage that will occur. And believe it or not, many residents are able to understand the complicated agreement which is why we continue to point out how bad this project is for the City of Moreno Valley.

Response 1:

The Commission addressed the issue of noticing at its June 11 hearing and determined adequate notice had been given regarding the WLC project and the development agreement for the purposes of the Commission's deliberations. Other comments presented do not address the EIR but are personal opinions which are not part of the CEQA process.

Marcia Amino (June 11, 2015)**Comment 1:**

(1) the property rights of the homeowners who live in the sphere of the WLC and who DO NOT WANT this project and its accompanying "sound walls", visual pollution, denigration of our air quality, and an over all lack of fitting into the general plan and what was to have been in that area of our city. I find it indefensible that our city could and would take the property rights of residents (and that includes the families who live just outside the city limits in the unincorporated county area) and give them to the project owner (Highland Fairview) WITHOUT their consent. I refer to the Development Agreement for the WLC wherein it states, "...including all real estate properties held by legal or equitable interest by the applicant, Highland Fairview ...". This should be criminal in my opinion.

(2) the Development Agreement, which pretty much mirrors that of Aquabella is contrary to the bests interests of Moreno Valley and its residents, in my opinion. I base this belief on the fact that our city did the infrastructure improvements around the Aquabella land, which leaves this developer once again off the hook and the city with less DIF from this project, if it ever gets off the ground. For that reason, I see the same pattern here with the WLC, and believe that the Development Agreement should go back to the drawing board and more specific safeguards and protection for our city and its tax money should be included in this legal document.

(3) *The fact that the Air Resources Board, in their letter of June 8, 2015 to Lead Planner, Mark Gross, cites legal concerns with the FEIR for this project, is troublesome, in that if you vote for this WLC, it will possibly end up costing the taxpayers of Moreno Valley more money due to possible litigation from the ARB in order to mandate our city to comply with their legal concerns.*

(4) *There are additional concerns from Riverside Agencies, and I would hope that as good neighbors to our other regional partners, you will vote this project down or in the alternative table it until the issues they have cited are mitigated.*

(5) *There is also the issue of the promise of jobs. I would remind you that this developer promised a number jobs for Sketchers which did not materialize, and in fact that total project is not in its next phase or anywhere near completion, so I find it unbelievable that our city would allow Overriding Considerations for this project in order for it to pass. If this developer is so desirous for jobs in our community, I would ask that a contract addendum be included wherein if the number of jobs did not materialize, this developer would be required to pay \$1,000,000 to the City of Moreno Valley for each job that does not come to fruition. I for one am tired of talk and false promises, and am asking that you as the first part of this project going forward, do the right thing and just Vote No for the WLC.*

I have other concerns but this will suffice for the present time. I am hopeful that this Planning Commission members are honest and want what is best for Moreno Valley, and if that is so, you have no other choice but to vote no on this project and not grant the General Plan Amendment nor approve any zone changes for that project.

Response 1:

(1) The WLC EIR examined the potential environmental impacts of the WLC project, including noise, aesthetics, air quality, traffic, and General Plan consistency and determined the project would have a number of significant impacts regarding these issues (FEIR Volume 3, Revised Draft EIR, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts. The City determined at the time of application for this project that the boundaries of the Specific Plan should encompass the seven existing onsite residences to provide for comprehensive land planning and traffic circulation. It is within the City's power to include properties within a Specific Plan for these purposes. The other comments presented do not address the EIR but are personal opinions which are not part of the CEQA process.

(2) The Development Agreement identifies the responsibilities for providing the infrastructure necessary to support the WLC Project. (i.e., roads, utilities, etc.). The WLC EIR examined the potential impacts of the WLC project, including traffic, and determined the project would have significant traffic impacts. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

(3) A separate response has been prepared for the ARB letter, and the reader is referred to that response for more details regarding ARB's comments on the WLC project. It should be noted that legal challenges against the WLC project would be paid for by the developer.

(4) The Final EIR contains responses to comments from various County and other agencies on the Draft EIR, and the City will respond as well to comments on the Final EIR prior to making a decision on the project.

(5) The estimate of jobs from the WLC project was conducted by a firm specializing in fiscal and economic studies (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O) using data, assumptions, and methodologies typical for these types of reports and the CEQA process. However, these are only estimates based on information available at the time. It should be noted that on April 28, 2015, the City Council approved the formation of a "Hire MoVal Incentive Program" and Section 4.11 of the WLC Development Agreement

outlines formation of a local hiring program consistent with the Hire MoVal program. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Margie Breitreuz (June 11, 2015)

Comment 1:

I strongly oppose the proposed World Logistics Center. Why should Moreno Valley bolster our logistics capacity beyond the level needed to meet our local needs in light of few jobs and low paying salaries. The strains on our infrastructure, tax revenues, schools, highways, and general well being of our residents would outweigh the meager benefits of the WLC.

Response 1:

The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 2:

Warehouses neither provide upward mobility or at least middle-class salaries for our residents. The majority of warehouse salaries are below poverty levels. In an article by Jock O'Connell, who is regarded as one of California's foremost authorities on world trade, global economy trends, and the internationalization of California's economy, he states that "our analysis finds that studies contending that the logistics sector is replacing manufacturing as a primary source of jobs for the state's blue collar workforce are, at best, misleading. And contrary to the claims of some economists, there is scant evidence that the logistics sector offers marginally-educated, unskilled workers a broad pathway for career advancement into positions paying a middle-class income."

Logistics/warehouses are a poor investment for our community. Too much of Moreno Valley is being designated for warehouses. We are putting our future economic opportunities in jeopardy. In his report summary Mr. O'Connell states that the consensus is that logistics/warehouses provide a relatively poor return on public investment and generally do not represent the highest and best use of which real-estate should be devoted. He further states that the logistics/warehouse sector is no panacea for communities seeking to create large numbers of jobs paying middle-class wages for those lacking the kinds of skills that are increasingly demanded of workers in today's economy.

Response 2:

The estimate of both short- and long-term jobs from the WLC project was conducted by an experienced firm specializing in fiscal and economic studies using data, assumptions, and methodologies typical for these types of reports and the CEQA process (David Taussig Associates, FEIR Volume 2, Appendix O). Each new use/user that moves into the WLCSP project area will be unique in terms of the number and type of jobs they bring to the area.

Comment 3:

Traffic and Circulation. The proposed location of WLC does not make sense. Highway 60 is already overburdened (with no monies available for improvements) and does not have the capacity for the amount of truck traffic that will be generated by this warehouse project. There is no appropriate rail access for warehouse transport in this area.

Residents should not have to face additional burdens such as safety, infrastructure debt and freeway congestion for this project. In addition, freeway ingress and egress is not suited for heavy truck traffic. Improvements are needed to adequately handle current usage.

Response 3:

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including freeway traffic on the SR-60 freeway. In addition, the Final EIR included an analysis of potential rail service to the WLC project site and determined it was not feasible from an environmental or logistical perspective (FEIR Volume 3, Section 4.15.3.3, Potential Rail Alternative, pages 4.15-51 to 4.15-53). However, as indicated in the TIA, jobs in east end help reverse the commuting traffic direction during peak periods on the SR-60 freeway. The EIR determined the project would have significant traffic impacts even with mitigation (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

Comment 4:

Residents' Investment in Community. *The recent city council recalls and the amount of financial investment the WLC developer had to expend to attain election results speak to the dissatisfaction residents have with the proposed WLC and change to the general plan land use. A great deal of time, expense and community input went into developing the city's general plan. The WLC drastically changes the quality of life for all residents. It is unfair subject residents to a project the magnitude the WLC.*

The WLC is counter to the type of community residents thought they were investing in when purchasing homes and raising families in Moreno Valley. This isn't just an "east end" issue. I have personally talked to hundreds of residents who live in all areas of Moreno Valley, friends who live in Mira Loma, etc. Warehouses and truck traffic do not make for a livable/sustainable community. People want better paying jobs for our residents and future generations. They do not want to be a city surrounded by warehouses.

The city's focus should to ensure that Moreno Valley is a vibrant community that is both sustainable and livable. In order to do this we need to attract cutting-edge industries that provide good jobs, occupations that attract and maintain community members, safe streets, educational opportunities, places to recreate, open space, housing alternatives, and clean air.

Response 4:

The WLC EIR examined the potential environmental impacts of the WLC project, including noise, aesthetics, air quality, traffic, and General Plan consistency, and determined the project would have a number of significant impacts relative to these issues (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 5:

Warehouse Automation. *In addition to meager salaries, a recent public radio broadcast interviewee indicated that warehouse jobs provide a poor square footage/employee ratio due to automation. A "60 Minutes" program also covered the issue of job loss through automation. Warehouses do not offer a vital economy, nor will it meet the occupational needs of future generations. Contrary to information being provided, warehouse jobs do not lead to career advancement for the majority of workers. A high percent of these jobs are temporary. Employees usually do not have sick pay, retirement benefits, family necessity leave, etc. Childcare is often unaffordable to these families. These conditions erode communities and families. The WLC is a deadend for Moreno Valley.*

Again, I am opposed to the WLC for these and many other issues with the project. No mitigation can change the impact the WLC will have on Moreno Valley.

Response 5:

The estimate of both short- and long-term jobs from the WLC project was conducted by a firm specializing in fiscal and economic studies using data, assumptions, and methodologies typical for these types of reports and

the CEQA process (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O). Each new use/user that moves into the WLCSP project area will be unique in terms of the number and type of jobs they bring to the area.

The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Marilyn Pearson (June 10, 2015)

Comment 1:

As a 29 year resident in District 1 and home owner in Moreno Valley, I have very serious concerns regarding the development of the World Logistics Center. We left the Jurupa area and moved to Moreno Valley in 1986 mainly because of the very poor air quality issues generated from the Mira Loma/Ontario area and its severe affects on our young son's asthma. The air quality was horrible with the constant haze and diesel odor in the air. We had exhaust soot sticking to everything and we were having to breathe that air. Although it wasn't completely remedied, our son did not have the severe asthma issues after we moved. Moving to Moreno Valley had made a huge difference in his health and well being.

I realize that there have been substantial exhaust improvements in the trucking industry, but not enough considering there is the potential of adding thousands of additional trucks moving goods in and out of that condensed area with only Redlands Blvd or Theodore Ave which are relatively narrow roads accessing the 60 freeway in an area where it is only 2 lanes in each direction. I have worked part-time for 9 years with varying shifts at Lake Perris and have traveled the 60 freeway at all different hours ranging from early mornings to late at night and the truck traffic has increased exponentially just since Sketchers opened and with the development of more industry in the Beaumont and Banning areas. Getting on to the 60 from Redlands or Moreno Beach Boulevards is getting to be a dangerous challenge at times because the freeway just doesn't have the capacity to handle it. At least the 60/15/10 freeways have several more lanes as well as several more access points to freeways to share the load in the Mira Loma /Ontario/Jurupa areas where there is substantially more truck traffic merging in comparison.

Response 1:

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including freeway traffic, while DEIR Section 4.3 examined various air quality impacts including non-cancer health hazards. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether or not the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 2:

I understand that there is a potential for many jobs, but are those warehouse/distribution center jobs truly going to pay a living wage with benefits to support the primarily (hopefully) resident families? The whole point of "logistics" is automation, downsizing costs and efficiency. I remember the promises of having over a couple thousand jobs when Sketchers was developed and that was not a reality. I have serious doubts that the many promised jobs are even possible in this economy or in the future. No companies hire many full-time positions within the logistics industry or any other business anymore to avoid paying the high cost of providing benefits. What will the trickle down effects be for our schools, police, fire, neighborhoods, hospitals, health and infrastructure when our air is filled with smog and warehouses where few can make a sustainable living?

I agree that we need more real jobs in our area, but with having only the narrow 60 freeway being the only corridor with no real plans to widen it and with the majority of jobs being lower wage potentially part-time jobs, will only be a detriment to our City and of no real future benefit. We could use more manufacturing and higher paying business headquarters here too, but there is little or no effort in that direction, just distribution centers.

Please do not move forward with the approval of the World Logistics Center at this time. We just don't have enough infrastructure nor real employment opportunities to support it without causing a tremendous negative impact. Much more effort must be made by our Counsel and City to be sure this huge development is taking us in the right direction to improve our way of life and standing as one of the largest cities in the Inland Empire. As you well know, it is common knowledge that Moreno Valley has a pretty low reputation in general around Southern California. Substantially more concern needs to be made in consideration of the long term impacts on resident's health, property values, traffic and with the desperate need to grow our city in a much more positive and productive direction and to make Moreno Valley a much more desirable city in which to live and work (such as Irvine has done). Please take great care with your decisions so that Moreno Valley doesn't become another ugly, smoggy, congested "logistics center" such as the Mira Loma/Jurupa areas have become.

As Our Council, you were elected and more importantly, entrusted to represent and make decisions for the well being and betterment of Moreno Valley. I'm truly concerned and disappointed as I watch some of the televised Council meetings and have seen the attitudes some of you have displayed towards this project, as well as towards the public concern and even towards each other at times. It's common knowledge that Highland Fairview has spent millions in their development efforts and made large contributions to some select political campaigns, but please, please, please, don't let their desires and dollars unethically influence and over shadow decisions for the greater good, resident health and needs for Moreno Valley.

Response 2:

The estimate of both short- and long-term jobs from the WLC project was conducted by a firm specializing in fiscal and economic studies using data, assumptions, and methodologies typical for these types of reports and the CEQA process (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O). As indicated, these are only estimates based on information available at the time of the report. Each new use/user that moves into the WLCSP project area will be unique in terms of the number and type of jobs they bring to the area.

The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Martin Sarafa (June 10, 2015)

Comment 1:

I am a frequent visitor to the San Jacinto Wildlife refuge and spend time in Moreno Valley with thousands of other sportsmen that enjoy the open space and natural beauty of the area. We spend time there and spend money there, and we have a reason to be there. I am entirely opposed to the proposed project as it would interfere with the enjoyment of the valley for those that live there and visit there. I am also a landowner in the area. If the natural surroundings are compromised and the migratory pathway of waterfowl are disrupted by this major project, I would no longer have any reason to be a landowner or visitor to the vicinity. I certainly wouldn't be coming out to spend time and money to view warehouses.

Response 1:

DEIR Section 4.4, *Biological Resources*, examined potential impacts to local plants and wildlife, including those of the adjacent San Jacinto Wildlife Area (SJWA). The EIR also examined wildlife movement and connectivity between the SJWA and the Badlands to the northeast. With the proposed 18 mitigation measures, the EIR determined that potential impacts to biological resources would be reduced to less than significant levels.

Peg Culpepper (June 8, 2015)²**Comment 1:**

I oppose this rezoning of the east portion of Moreno Valley for this warehouse. We live in Moreno Valley and don't want to see this ruin our city and air quality.

Response 1:

DEIR Section 4.3, *Air Quality*, examines the potential impacts of the project relative to criteria pollutants and health risks, including cancer. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Peggy Holmes (June 10, 2015)**Comment 1:**

As a 30 year resident of Moreno Valley, I'm begging you to deny the WLC! It's not fair to change the city's general plan to fit HF's plan for the massive warehouses! We have plenty of them in this city already. The location is wrong ... The south/west part of the city is a much more suitable location! Please restore my faith in our icy officials; show us that Moreno Valley can't be bought! Listen to the people, not a developer who had paid people to get his way!

Note from From Juliene Clay: *Ms. Holmes stated she would like you to vote No on the WLC.*

Response 1:

The WLC EIR examined the potential environmental impacts of the WLC project, including General Plan consistency (e.g., air quality, traffic, etc.) and determined the project would have a number of significant impacts (e.g., traffic, air quality, etc.)(FEIR Volume 3, Revised Draft EIR, Table 5.A, Section 5.1, page 5-1). DEIR Section 6 examines various alternatives to the proposed WLC project, including alternative locations in other areas such as the industrial area in the southwestern portion of the City. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts, including if an alternative location would result in fewer or reduced significant impacts compared to the proposed WLC project location. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

The Purcell Family (June 11, 2015)**Comment 1:**

Hi I'm writing to let you know I am not at all happy with all the warehouses popping up all over Moreno Valley and the WLC project I keep hearing about. My husband and I have lived here in Moreno Valley since 1986, and until the last few years have been fine without the need for all these warehouses. They do not benefit our community in any way there are not a lot of jobs created for our own citizens and also all the extra traffic it creates and all the trucks to and from the warehouses.

Response 1:

The estimate of jobs from the WLC project was conducted by a firm specializing in fiscal and economic studies using data, assumptions, and methodologies typical for these types of reports and the CEQA process (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O). The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

² note: a separate response was prepared for an email from this commenter with the same date

Randy Sohn (June 8, 2015)**Comment 1:**

How can the current 60 freeway support the proposed 11,000 or more semi-trucks carrying tens of thousands of loads daily? The 60 is jammed packed during rush hour times even with the updated 60 freeway lanes. How can it be possible that there will not be even more traffic, pot holes, smog from cars and trucks waiting in traffic, trash, etc. to our freeways and city?

Response 1:

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including freeway traffic, DEIR Section 4.3 examined various air quality impacts. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 2:

Why is this proposed World Logistics Center Project even being considered when Iddo Benzeevi is asking the tax payers to foot the bill for the streets, sewer systems, fire department, etc. for this area for 100 million dollars?

Response 2:

The Development Agreement identifies the specifics regarding infrastructure responsibilities. In addition, Mitigation Measure 4.15.7.4A requires Highland Fairview to construct or pay for project-related roadway infrastructure improvements within Moreno Valley.

Comment 3:

How are we to know if this project will actually produce the real revenue that it proposes?

Response 3:

The estimate of jobs and revenues from the WLC project was conducted by a firm specializing in fiscal and economic studies using data, assumptions, and methodologies typical for these types of reports and the CEQA process (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O). The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 4:

The Sketchers development brought its own workers from outside our city, how is the city to know if the proposed logistic center will truly benefit Moreno Valley residents seeking work?

Response 4:

On April 28, 2015, the City Council approved the formation of a "Hire MoVal Incentive Program" and Section 4.11 of the WLC Development Agreement outlines formation of a local hiring program consistent with the Hire MoVal program. By generating thousands of local jobs at the WLC, it is likely that some portion of the workers employed at the WLC site would also be Moreno Valley residents.

Comment 5:

Why is the city not looking into recruiting tech companies instead of warehousing?

Response 5:

This comment is beyond the scope of the EIR to examine as it not relevant to the existing proposed WLC project, therefore, no further response is necessary.

Stan Perry (June 11, 2015)**Comment 1:**

This contact is to express my strong opposition to the World Logistics Center. The negative environmental impact to the area would be a disaster for the residents of Moreno Valley and it's neighbors. I am a frequent visitor to the SJWA and am convinced that this development would have a huge negative impact if built.

Response 1:

DEIR Section 4.4, *Biological Resources*, examined potential impacts to local plants and wildlife, including those of the adjacent San Jacinto Wildlife Area (SJWA). With the proposed 18 mitigation measures, the EIR determined that potential impacts to biological resources would be reduced to less than significant levels. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Tom Rehard (June 9, 2015)**Comment 1:**

How is our air quality out here? what will the thousands of diesel trucks do to the air quality alone?

Response 1:

DEIR Section 4.3, *Air Quality*, examines the potential impacts of the project relative to criteria pollutants and health risks, including cancer. The EIR determined the project would have significant air quality impacts even with mitigation. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts.

Valerie Horton (June 11, 2015)**Comment 1:**

I am writing to all of you to ask that you vote NO on the WLC. Regardless what district you preside over, your decisions affect all the citizens of Moreno Valley. Why vote NO....

1. Our current infrastructure cannot handle additional traffic.

Take a drive down the 60 FWY, toward Fullerton and see the two lanes of truck traffic and the congestion it causes. The freeway has 4 lanes and 1 carpool lane. Two lanes are taken up by back to back trucks, which congest the traffic throughout this corridor. Our part of the freeway has 2 lanes and 1 carpool, which goes down to 2 lanes and truck traffic already congests the freeway.

Ironwood Ave., Sunnymead Blvd., and Alessandro Blvd. are currently being used to bypass congested traffic on the freeway by many off whom do not live in this city. Recently, speed limit changes have been made but yet I still see people speeding through and never see police/ traffic control on Ironwood Ave. But then again, I know our Police Dept. is doing the best it can with what it has and most of their time is spent handling the ever increasing criminal element within the city.

Our roads throughout the city are in need of repairs. The freeway on and off ramps are in need of repair, except for Nason, of course. All the money spent on Sunnymead Blvd. revitalization has produced what? New businesses....NO! The street looks worse than before.

Response 1:

DEIR Section 4.12 examined the potential noise impacts of the WLC project, including freeway traffic noise, and determined the project would have significant impacts even with mitigation. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts.

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including freeway traffic, and determined the project would have significant traffic impacts even with mitigation. The City Planning

Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 2:

2. The warehouses will pay minimum to low wages, which only bring in those willing to work those types of jobs. They will not be able to afford to buy, so more renters. They will shop the 99 cent stores (Amazing how many 99 cent stores we have) and low end type businesses. We will gain more homes occupied with multiple families. The city will continue to lose home owners, who will either sell (most likely losing money) or rent the home out, to move to a more preferable neighborhood/city. Unfortunately we now only have Cardenas markets, Food for Less, Win Co., or Stater Bros. to shop at since the other businesses have left. All but Staters are not stores I feel comfortable going in, cleanliness less than desirable, quality of food less than desirable, and less than desirable people hanging in and around the areas.

Response 2:

The estimate of jobs from the WLC project was conducted by a firm specializing in fiscal and economic studies using data, assumptions, and methodologies typical for these types of reports and the CEQA process (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 3:

3. Air quality is already not the best and will only get worse.

Response 3:

DEIR Section 4.3, *Air Quality*, examines the potential impacts of the project relative to criteria pollutants and health risks, including cancer. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 4:

4. Most of the construction will be performed by companies outside of the city and will utilize current work force. Jobs available will be at a minimum at best. Past projects, such as this, provided no additional employment. I wonder how many residents will say they have shopped at Sketchers, if polled. I mean have bought and not just went to look out of curiosity. Not I. Have you?

Response 4:

The estimate of both short- and long-term jobs and revenues from the WLC project was conducted by a firm specializing in fiscal and economic studies using data, assumptions, and methodologies typical for these types of reports and the CEQA process (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O). The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 5:

The Sketchers development brought its own workers from outside our city, how is the city to know if the proposed logistic center will truly benefit Moreno Valley residents seeking work?

Response 5:

On April 28, 2015, the City Council approved the formation of a "Hire MoVal Incentive Program" and Section 4.11 of the WLC Development Agreement outlines formation of a local hiring program consistent with the Hire MoVal program. By generating thousands of local jobs at the WLC, it is likely that some portion of the workers

employed at the WLC site would also be Moreno Valley residents. , Each new use/user that moves into the WLCSP project area will be unique in terms of the number and type of jobs they bring to the area.

Comment 6:

This city has continued to fail because lack of planning, promoting, and working to maintain roads, provide adequate police to deal with the increasing criminal element, Code enforcement to make sure properties are being properly maintained with swift action and follow through to completion. (Example: 11761 Davis St. (Molina, what have you done?) Numerous complaints have been made about the deterioration of the property, for many years. The property is a dump site now and poses a security risk. It is located down the street from an elementary school, with many students passing daily. A few homes away, on the corner of Virginia Lane & Davis St., there is a white house (shack looking) that houses multiple adult men who are known to be heavy drinkers and one is listed on Megan's Law web site as a child molester. This home is less than 2,000 feet from the elementary school. Vagrants/druggies have been seen in and around the deteriorating property. We continue to be told the city is working on it and a case is at the City Attorney's office but nothing has been done yet. Why has this been allowed to continue for years? The city should own the property now and should have had the property cleared of all falling structures, trash, and overgrown weeds.)

I could continue on and on about the problems this city is facing but I value my time and know it is only a matter of time before, I too, move from this failing city.

Again, you all need to focus on the current issues plaguing the city and not just continue to add more issues. The WLC project is already being questioned by outside sources on its reports factuality and legitimacy. I am sure this proposed development will end up in court and cost tax payers again for frivolous litigation (JP @ MAFB, covering Gutierrez's legal fees, etc...) These are not the types of jobs the good citizens of Moreno Valley need, nor will it alleviate the current issues plaguing the city. The time is now to take a step back and develop a plan for the city to attract business, quality people, home owners, to clean up the city and reduce the criminal elements. It is apparent there are many people in the city who are passionate about the city and its success. Promote and develop citizen interaction/committees to help revitalize Moreno Valley.

Response 6:

These comments do not address the EIR but are personal opinions which are not part of the CEQA process.

Marian Bailey (June 15)

Comment 1:

I live in Riverside within earshot of the grade that climbs from Riverside up to Moreno Valley, so naturally I am concerned about the addition of many big rigs to the 60 freeway, since I can hear every single one of them.

It seems to me that the strongest argument in favor of the World Logistics Center (WLC) is the employment it would provide to residents of Moreno Valley, Riverside, Redlands, and other local communities. However, I think this idea should be evaluated, and to do this, I suggest that the types and numbers of positions the WLC would provide be compared with the types and numbers of positions currently occupied by local residents. My guess is that there would be a considerable mismatch--that is, that the local population could not supply a substantial proportion of the positions offered by the WLC.

As I understand it, the WLC itself will rely largely on computerized robotic operations, so the positions it offers will have to do with servicing and otherwise maintaining the computers and the robots, with a relatively small number of administrative positions for support. I think Census data and possibly the Economic Development Department could be consulted to find out about how many computer programmers and robot technicians currently live in Moreno Valley and the rest of the local area; if there is a shortfall, people will have to commute, putting more traffic on the roads, or move into Moreno Valley itself, adding to congestion.

Of course, the WLC will employ a lot of truck drivers, and this occupation might absorb some of those who are currently unemployed. My question is, what kind of work force does Moreno Valley want to attract--a less, or a more well educated one?

In addition, the WLC will lock Moreno Valley into what would be referred to in biology as a monoculture ... square miles devoted to warehouses that would never be used for anything else. I would hope for better for Moreno Valley ... I would hope for a diverse set of companies that employ white-collar workers. They might be more difficult to attract originally, but ultimately they would provide the community with a better way of life.

Response 1:

DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including freeway traffic on the SR-60 freeway through Riverside. The EIR determined the project would have significant traffic impacts even with mitigation. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and decide whether the project's benefits outweigh its anticipated impacts.

The estimate of both short- and long-term jobs from the WLC project was conducted by a firm specializing in fiscal and economic studies using data, assumptions, and methodologies typical for these types of reports and the CEQA process (David Taussig Associates, FEIR Volume 3, Revised Draft EIR, Appendix O). Each new use/user that moves into the WLCSP project area will be unique in terms of the number and type of jobs they bring to the area

The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Marion Bailey (June 18, 2015)

Comment 1:

I am writing to say that I think Moreno Valley can do better than approve the World Logistics Center (WLC). Right now, the east end of the Moreno Valley is attractive, with its open land and rural aspect; I can imagine that it would appeal to many other developers, some of whom would be likely to want to situate business parks there. The WLC, with its square miles of warehouses, would eradicate that appeal. Simultaneously, the WLC would make Moreno Valley more vulnerable to the downturns in the economy that rely on the sale of material goods.

Response 1:

Section 6 of the EIR (FEIR Volume 2, Revised Draft EIR), examined a number of alternatives to the proposed WLC project – two of the alternatives had mixed uses including one with light industrial (1,000 acres - business park) and office (100 acres) uses (Alternative 2 - Mixed Use A). The EIR determined that Alternative 2 – Mixed Use A had reduced air quality and noise impacts but did not reduce them to less than significant levels, and had significantly increased traffic impacts. In addition, this alternative did not achieve the objectives of the project to the same degree as the proposed project. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 2:

The WLC would also make the eastern end of the valley less appealing to migrating birds, some of which now settle in and around Mystic Lake to rest and recoup.

Response 2:

Section 4.4 of the Draft EIR examined potential impacts to birds and migrating birds associated with Mystic Lake and the San Jacinto Wildlife Area and determined potential impacts were less than significant with the proposed 250-foot development setback and additional 150-foot building setback from the SJWA (i.e. southern

WLC Specific Plan property line addressed in Mitigation Measure 4.4.6.1A) plus the recommended Mitigation Measures 4.4.6.4A through D (migratory/nesting birds) and 4.4.6.4F and G (management of buffer areas).

Comment 3:

The addition of big rigs to the 60 freeway would be unwelcome too. I drive that freeway myself, as do many commuters, and the part of the route that travels downhill from about Day Street to University Avenue is already very dangerous; adding huge trucks with heavy loads would make things even worse. Noise would be a problem too; trucks going downhill often chortle and snort, and since I can hear this from my house, hundreds of other people will be affected by that noise as well.

Response 3:

DEIR Section 4.12 examined the potential noise impacts of the WLC project, including freeway traffic noise, and determined the project would have significant impacts even with mitigation. DEIR Section 4.15 examined the potential traffic impacts of the WLC project, including freeway traffic, and determined the project would have significant traffic impacts even with mitigation. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts.

Comment 4:

Please vote against this development. Moreno Valley has the luxury of time, because its population is steadily increasing. Better, more attractive development proposals than this one will be forthcoming in the years to come, and I think that will be the time to vote yes.

Response 4:

The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts.

Thomas Jerele Sr. (June 18, 2015)

Comment 1:

Dear Planning Commissioners, please allow me to thank you all and your Staff for an optimum public hearing to date on the World Logistics Center. I was present for the entirety of the initial hearing on 6/11/15. The Staff Report/Consultant's comments on the Development Agreement and the Highland Fairview were highly informative and very valuable. In short, they took the mystery out of much of the projects perception. I am looking forward to the continuation of the Hearings. I infer that our Planning Commissioners will continue to ask probing and important questions about the impact of the Project. I affirm that procedure.

A comment was expressed from the crowd about "why can't we 'see' the project?" This was in reference to the massive "Burm" along Redlands Ave. on the west boundary of the Project, I have the same question. This appears to be a well- conceived, high value Project. In my opinion, we would want to eliminate the "Burm," such that the World can see and appreciate Project.

Response 1:

The purpose of the "berm" is to provide both visual and noise screening for the nearby residential uses from the future warehouses which will be a maximum of 60 feet in height at that location (i.e., generally east of Redlands Blvd. and Merwin Street). Vegetation may help screen the buildings visually but either solid walls or soil berms are needed to reduce noise impacts. It is typical to provide some type of screening between residential and warehouses as most residents probably do not consider large warehouse buildings to be so visually attractive that no screening is necessary. The EIR evaluated the potential visual and noise impacts of the project and recommended a combination of berms, solid walls, and landscaping to provide visual and noise buffering between the two uses. The other comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Elie Chouinard (June 21, 2015)**Comment 1:**

My name is Elie Chouinard. I am a resident of Moreno Valley and have been since 1986. I want the record to show that I am in favor of the World Logistics Center being built in Moreno Valley. I believe it is a viable solution to our current and future economic, environmental and social issues. A project of this size and scope needs to be researched and gone over with due diligence. From what I understand there are no justifiable reasons why this project should not go forward. Opportunity is knocking. Now is the time for Moreno Valley to boldly enter into this win win situation and finally break the mold of past anti-progress decisions.

Response 1:

Comment noted. The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Jack Weleba (June 22, 2015)**Comment 1:**

I understand the need for cities to produce income as it is necessary to turn the wheels that run the programs but, and this is a big but, this idea for the area in mind is terrible on many fronts. First and foremost in my estimation is the destruction of natural habitat that is quickly diminishing all over the state. There are constant efforts in cities to provide "green areas" not only for children to play in but for the plants that provide much needed oxygen for humans to live. The continued destruction of this type of habitat is tantamount to suffocating those who live in the area and beyond.

Secondly the state and many agencies, as well as private citizens, have spent millions of dollars to protect, upgrade and provide for future wildlife at the San Jacinto Wildlife Refuge as well as surrounding properties. This would not be possible without all of the concerted efforts of all involved. Many of us have spent many hours and dollars making sure the waterfowl and all other wildlife that is supported by these lands have a place to rest, feed and breed, continuing the life cycle as nature intended it. Close to 90% of all the wetlands in the United States have been decimated by developers, turning once abundant havens for many creatures into parking lots and homes for people. This has taken a catastrophic toll on all the animals that require open space to survive.

Thirdly, I don't believe that this community will be served by the few jobs actually provided by this development and will actually be harmed by the huge amount of traffic congestion and air pollution caused by the thousands of trucks that will be transporting all the goods going in and out of these warehouses, which although being euphemistically called a Logistics Center, is basically just a huge group of warehouses. There are many locations that would be better served and cause less problems and interruptions to this area and should be considered before going ahead with any project of this size.

Response 1:

Potential impacts of the WLC project relative to air quality, biological resources, and traffic were addressed in Sections 4.3, 4.4, and 4.15 of the Draft EIR, respectively (FEIR Volume 3, Revised Draft EIR). The DEIR concluded that the project would have significant impacts regarding these issues even with the implementation of all feasible mitigation measures (FEIR Volume 3, Table 5.A, Section 5.1, page 5-1). The City Planning Commission and City Council will weigh the various impacts and benefits of the proposed WLC project and determine whether the project's benefits outweigh its anticipated impacts. The rest of the comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

Comment 2:

Obviously the developer wants this project to go forward as it will put a lot of money in his pocket but it will be at the expense of the many and this is not good. I am in the engineering field and I know we need infrastructure to facilitate the economy but this project has all the earmarks of a disaster waiting to happen in too many ways.

I sincerely hope you and all who are in the decision making process will consider this to be a big mistake and prevent it from going forward. Thank you for your time and feel free to contact me.

Response 2:

The Development Agreement identifies the responsibilities for providing the infrastructure necessary to support the WLC Project. (i.e., roads, utilities, etc.). In addition, Mitigation Measure 4.15.7.4A addresses installation of roadways relative to the WLC project. The rest of the comments presented by the commenter do not address the EIR but are personal opinions which are not part of the CEQA process.

MEMORANDUM

DATE: July 9, 2015 (updated from June 25, 2015)

TO: Mark Gross, Moreno Valley Planning Department

FROM: Kent Norton, AICP, Associate, LSA Associates, Inc.

SUBJECT: **Response to HAGEMANN Attachment in Letter from Lozeau Drury (LIUNA Union)**

In a letter dated June 10, 2015, Richard Drury with the law firm of Lozeau Drury representing the LIUNA union submitted comments on the WLC Project FEIR. A separate attachment was provided with comments on agricultural resources prepared by Matthew Hagemann, a hydrogeologist. The specific comments by Mr. Hageman are presented below, followed by responses to each comment.

Comment 1:

We have reviewed the May 2015 the World Logistics Center Project (“Project”) Final Environmental Impact Report (FEIR), which includes responses to comments (“Responses”) we made in an April 13, 2013 letter on the 2013 Draft Environmental Impact Report (DEIR).

We have found significant shortcomings in the Responses to the issues identified in the Air Quality analysis. We maintain that the health risks posed to nearby sensitive receptors from the Project’s diesel particulate matter (DPM) emissions are significant. As a result, the FEIR should include the additional mitigation measures identified in the comments to the DEIR to further reduce these health risks. The FEIR should be revised to address our comments and then recirculated to allow for review of the adequacy of the responses and of mitigation that is necessary.

Response 1:

The FEIR does not meet any of the criteria for recirculation: (1) there are no new or more severe environmental impacts, (2) there are no feasible project alternatives that would lessen the environmental impacts and all feasible mitigation has been adopted, and (3) it is neither inadequate nor conclusory.

Comment 2:

Unsubstantiated Determination of Health Risk Impacts as Less-Than-Significant

In the comments to the DEIR, we suggested mitigation measures to reduce the cumulative impacts of the Project’s diesel particulate matter (DPM) emissions. Specifically, we suggested the installation of Minimum Efficiency Reporting Value (MERV) filters rated at 13 or above at all residential units where incremental cancer risks exceed one in one hundred thousand (FEIR Volume I, p. 665-666). This measure was not incorporated for the following two reasons, according to the Responses: (1) no residences outside the project boundaries would have a cancer risk over the 10 in a million threshold; and (2) the latest research demonstrates that the new technology diesel exhaust does not contribute to cancer (FEIR Volume I, p. 237).

We have two issues with this statement: (1) The cancer risk threshold of 10 in a million is exceeded by residences within the Project boundaries (FEIR Volume I, p. 237; and (2) cited research in the Responses that purportedly demonstrates the non-carcinogenic effects of new technology diesel exhaust (NTDE) has yet be approved by any regulatory agencies and is not consistent with the conclusions made by OEHHA; therefore, this report alone should not be used as a way exclude the significance of the cancer risks posed to the residences located within the Project boundaries.

Response 2:

The commenter contends that significant risk remains for residences within the project boundaries. The FEIR presents the results of the cancer risk assessment based on the latest OEHHA guidelines (FEIR Section 4.3.6.5), which shows no significant risk outside the project boundaries but that three homes would experience a potentially significant risk inside the project boundaries. As explained in the FEIR (p. 4.3-15), the OEHHA guidance used to conduct that analysis relies upon research studying the cancer impacts of traditional diesel engines (pre-2007 model year diesel engines). OEHHA guidelines have not examined the cancer risk associated with new technology diesel engines (model year 2007 and newer diesel engines). The HEI ACES is the first comprehensive study to examine the lifetime cancer risk from new technology diesel engines. As ACES Phase 1 and 2 demonstrate, new technology diesel exhaust is substantially different from traditional diesel exhaust which drives the HEI study to evaluate the health impacts of new technology diesel exhaust. All previous studies, including those evaluated by OEHHA examined the health effects of traditional diesel exhaust which date back to research done in the 1990's and 2000's and earlier. CEQA does not require that agencies "approve" new research for it to be considered in an environmental review. In addition, from our assessment the HEI ACES was conducted with expert oversight. ACES has been guided by an ACES Steering Committee consisting of representatives of HEI and the Coordinating Research Council (CRC: a nonprofit organization that directs engineering and environmental studies on the interaction between automotive or other mobility equipment and petroleum products), along with the U.S. Department of Energy, U.S. EPA, engine manufacturers, the petroleum industry, CARB, emission control manufacturers, the National Resources Defense Council, and others. The Health Effects Institute (HEI), funded in part by USEPA, was selected to oversee Phase 3 of ACES. The HEI ACES is a high-quality, life-time exposure study of diesel exhaust that deserves consideration. For that reason, the FEIR considers the study's conclusion that "in contrast to previous health studies of TDE [traditional diesel exhaust], the ACES study found that lifetime exposure did not induce tumors or pre-cancerous changes in the lung and did not increase tumors related to NTDE [new technology diesel exhaust] in any other tissue (HEI ACES, p. 1)" and together with substantial mitigation (e.g., MM 4.3.6.2A and 4.3.6.3B) incorporated the FEIR concludes that the project does not significantly increase cancer risk. Notwithstanding this conclusion, the City and the developer have established provisions above and beyond mitigation measures in the proposed Development Agreement for Air Filtration Systems meeting MERV-13 standards be provided in the existing homes within the Specific Plan Area.

Comment 3:

The FEIR's "Air Quality, Greenhouse Gas, and Health Risk Assessment Report" (Air Quality Report) discusses the methods used to conduct the updated health risk assessment, and evaluates the significance of the results of this analysis. Table 70, in this report, summarizes the estimated cancer risks based on the "current OEHHA guidance" with mitigation (see excerpt below) (p.272).

Receptor Location	Incremental Project Cancer Risk (risk per million)			SCAQMD Cancer Risk Significance Threshold (risk/million)	Exceeds Threshold?
	Construction	Operation	Total ⁽¹⁾		
Maximum risk anywhere in the modeling domain ⁽²⁾	11.4	5.6	17.0	10	Yes
Existing residences within the project boundaries:					
13100 Theodore St	11.2	4.3	15.7	10	Yes
13200 Theodore St	11.1	4.5	15.6	10	Yes
13241 Theodore St	11.4	5.6	17.0	10	Yes
30220 Dracaea Ave	5.0	3.6	8.6	10	No
30240 Dracaea Ave	5.0	3.6	8.6	10	No
29080 Dracaea Ave	3.0	1.5	4.5	10	No
29140 Dracaea Ave	4.8	1.7	6.5	10	No
Maximum risk at any existing residential area outside of the project boundaries ⁽³⁾	2.7	1.6	4.3	10	No
Maximum risk at any undeveloped residentially zoned property outside of the project boundaries ⁽⁴⁾	2.1	1.9	4.0	10	No

The cancer risks to three existing residences within the project boundaries exceed the 10 in one million threshold. As a result, the Project's cancer-related impacts should be deemed as significant and all feasible mitigation measures should be implemented to reduce these risks to less-than-significant levels. The FEIR acknowledges that "there is still a significant impact after mitigation at three existing sensitive/residential receptors located within the project boundary," but ultimately concludes that the Project's cancer-related impact are less than significant (Air Quality Report, p. 270).

Response 3:

As the commenter notes, there are no impacts outside the project boundaries and only three homes within the project boundaries have impacts that would exceed the significance threshold. However, as discussed in the FEIR Section 4.3 and in response to the CARB comment letter, none of the studies upon which the OEHHA methodology is based have evaluated the health impacts of new technology diesel engines such as those required by this project. The HEI ACES is the first study to do so. Based on the conclusions of that study, as described in FEIR Section 4.3.6.5, a less than significant impact for increased cancer risk would be expected to those homes within the project boundaries. As a result, no further mitigation is required related to reducing cancer risk.

Comment 4:

The FEIR attempts to justify this conclusion by referring to the Advanced Collaborative Emissions Study (ACES): Lifetime Cancer and Non-Cancer Assessment in Rats Exposed to New Technology Diesel Exhaust, conducted by the Health Effects Institute (HEI), which states that new technology diesel exhaust does not contribute to cancer. The FEIR states that "the cancer risk quantification using the current OEHHA guidance is provided for informational purposes only. It is to document the cancer-related impacts of the project given the assumption that new technology diesel exhaust causes cancer, which is contrary to the results in the HEI study (Air Quality Report, p. 270)." This conclusion, however, contradicts what is recommended by the California Office of Environmental Health Hazard Assessment (OEHHA) with regard to the cancer risk from new technology diesel exhaust (NTDE) compared to the cancer risk from traditional technology diesel exhaust (TDE).

OEHHA conducted a "Risk Assessment Evaluation of New Technology Diesel Engine Exhaust Composition," and came to an entirely different conclusion. OEHHA acknowledged that in diesel engine manufacturers have developed NTDE, which produce substantially lower exhaust levels of diesel exhaust particulates (DEP) and air toxics compared to older engines. However, "experimental data from several NTE engine emissions studies indicate that the reductions of some air toxics such as polycyclic aromatic hydrocarbons, benzene and 1,3-butadiene in NTE exhaust (often 80 – 90%) are not as great as the corresponding reductions in DEP (often 95 – 99%)." The resulting air toxics/DEP ratios for NTE exhaust may be greater than or equal to similar ratios found in exhaust from older diesel engines. An analysis of data from one published review indicated that the average 3-ring PAH, 1,3-butadiene and benzene/DEP ratios increased in NTE exhaust compared to older DEE by 2-, 10- and 4-fold, respectively.

These data suggest that while the absolute amount of DEP (and thus estimated cancer risk) and air toxics is much reduced in NTE exhaust, the exhaust composition has not necessarily become less hazardous. Thus, the available data do not indicate that NTE exhaust should be considered to be fundamentally different in kind compared to older DEE for risk assessment purposes, and suggests that the TAC cancer unit risk value for DEP be used.

OEHHA maintains that NTDE has the same carcinogenic effects as TDE, and should be treated as such when conducting a health risk assessment. Furthermore, neither the United States Environmental Protection Agency (USEPA) nor the California Air Resources Board (CARB) has accepted the conclusions made within HEI's report, nor have they adjusted their stance on the cancer risk associated with NTDE. Until an authoritative body adopts and integrates HEI's findings into applicable regulations, HEI's report should not be used as a way to deem the cancer risks from this Project as insignificant. Furthermore all feasible mitigation measures,

as suggested in our comments (to include use of Minimum Efficiency Reporting Value (MERV) filters), should be implemented in order to reduce the cancer risk to these onsite residences to less-than-significant levels.

Response 4:

As ACES Phase 1 and 2 demonstrate, new technology diesel exhaust is substantially different from traditional diesel exhaust necessitating the HEI study to evaluate the health impacts of new technology diesel exhaust. While the HEI ACES study was not designed to examine the per unit mass toxicity of diesel exhaust, it was designed to evaluate the impact of lifetime exposure of diesel exhaust on tumor formation. The study's conclusion is straightforward:

"Lifetime inhalation exposure of rats exposed to one of three levels of NTDE from a 2007-compliant engine, for 16 hours per day, 5 days a week, with use of a strenuous operating cycle that more accurately reflected the real-world operation of a modern engine than cycles used in previous studies, did not induce tumors or pre-cancerous changes in the lung and did not increase tumors that were considered to be related to NTDE in any other tissue. A few mild changes were seen in the lungs, consistent with long-term exposure to NO₂, a major component of NTDE, which is being further substantially reduced in 2010-compliant engines" (HEI ACES, p. 1).

As a final note, while the FEIR concluded that a less than significant impact for increased cancer risk would occur, as part of the development agreement between the developer and the City, the developer is required to outfit the three homes identified as exceeding the OEHHA-based risk calculation with MERV-13 air filters.