Final Environmental Impact Report
SCH No. 2012121011

FIRST INLAND LOGISTICS CENTER II

Moreno Valley, California
EIR Case P12-064

Lead Agency
The City of Moreno Valley
14177 Frederick Street
PO Box 88005
Moreno Valley, CA 92552

Date: November 26, 2013

Final Environmental Impact Report
SCH No. 2012121011

First Inland Logistics Center II
Moreno Valley, California
EIR Case P12-064

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Lead Agency Discretionary Permit
Building Plot Plan (PA12-0023)

Date: November 26, 2013

Section Name and Number **Page**

F.0 Final Environmental Impact Report FEIR-1
F.1 Introduction to the Final Environmental Impact Report FEIR-1
F.2 Responses to Comments FEIR-1
F.2.1 CEQA Requirements Regarding Comments and Responses FEIR-2
F.2.2 Revisions to the Proposed Project in Response to Public Comments FEIR-3
F.2.3 Corrections and Additions to the Draft EIR in Response to Public Comments FEIR-3
F.2.4 Responses to Comments FEIR-6
F.3 No Recirculation of the Draft Environmental Impact Required FEIR-7
F.4 Responses to Comment FEIR-7

S.0 Executive Summary S-1
S.1 Introduction S-1
S.2 Project Overview S-2
S.2.1 Location and Regional Setting S-2
S.2.2 Existing Physical Conditions S-2
S.2.3 Project Objectives S-2
S.2.4 Background S-3
S.2.5 Project Description Summary S-3
S.3 EIR Process S-4
S.4 Areas of Controversy and Issues to be Resolved S-4
S.5 Alternatives to the Proposed Project S-5
S.5.1 Alternative 1 – No Project/Trailer Yard Alternative S-5
S.5.2 Alternative 2 – No Project/Industrial Building Alternative S-6
S.5.3 Alternative 3 – Reduced Project/Small Buildings Alternative S-6
S.5.4 Alternative 4 – Reduced Project/North Building Alternative S-6
S.6 Summary of Impacts, Project Requirements, Mitigation Measures, and Conclusions S-7
S.6.1 Effects Found Not to be Significant S-7
S.6.2 Impacts of the Proposed Project S-7

1.0 Introduction 1-1
1.1 Purposes of CEQA and this EIR 1-1
1.2 Summary of the Project Evaluated by this EIR 1-2
1.3 Project History 1-3
1.4 Legal Authority 1-4
1.5 Responsible and Trustee Agencies 1-5
1.6 EIR Scope, Format, and Content 1-5
1.6.1 EIR Scope 1-5
1.6.2 EIR Format and Content 1-7

2.0 Environmental Setting 2-1
2.1 Regional Setting and Location 2-1

Section Name and Number **Page**

2.2 Local Setting and Location 2-1
2.3 Surrounding Land Uses and Development 2-2
2.4 Planning Context 2-2
2.4.1 City of Moreno Valley General Plan 2-2
2.4.2 Moreno Valley Industrial Area Plan (Specific Plan 208) 2-5
2.4.3 Zoning 2-5
2.5 Existing Physical Site Conditions 2-5
2.5.1 Land Use 2-5
2.5.2 Air Quality and Climate 2-8
2.5.3 Topography, Geology, and Soils 2-8
2.5.4 Hydrology 2-8
2.5.5 Biological Resources 2-10
2.5.6 Cultural Resources 2-10
2.5.7 Transportation 2-10
2.5.8 Noise 2-11
2.5.9 Utilities and Service Systems 2-11

3.0 Project Description 3-1
3.1 Project Location 3-1
3.2 Statement of Objectives 3-1
3.3 Proposed Plot Plan PA12-0023 3-2
3.3.2 General Description of Plot Plan PA12-0023 3-3
3.3.3 Architecture 3-3
3.3.4 Conceptual Landscape Plan 3-3
3.3.5 Infrastructure Improvements 3-4
3.4 Standard Requirements and Conditions of Approval 3-6
3.5 Summary of Requested Actions 3-7

4.0 Environmental Analysis 4.0-1
4.0.1 Summary of EIR Scope 4.0-1
4.0.2 Scope of Cumulative Effects Analysis 4.0-1
4.0.3 Identification of Impacts 4.0-3

4.1 Air Quality 4.1-1
4.1.1 Existing Conditions 4.1-1
4.1.2 Basis for Determining Significance 4.1-11
4.1.3 Impact Analysis 4.1-11
4.1.4 Cumulative Impact Analysis 4.1-24
4.1.5 Applicable Project Requirements 4.1-25
4.1.6 Significance of Impacts Before Mitigation 4.1-26
4.1.7 Mitigation Measures 4.1-27
4.1.8 Significance of Impacts After Mitigation 4.1-30

4.2 Greenhouse Gas Emissions 4.2-1

Section Name and Number **Page**

4.2.1 Existing Conditions 4.2-1
4.2.2 Basis for Determining Significance 4.2-16
4.2.3 Impact Analysis 4.2-17
4.2.4 Cumulative Impact Analysis 4.2-30
4.2.5 Applicable Project Requirements 4.2-30
4.2.6 Significance of Impacts Prior to Mitigation 4.2-31
4.2.7 Mitigation Measures 4.2-31

4.3 Noise 4.3-1
4.3.1 Existing Conditions 4.3-1
4.3.2 Basis for Determining Significance 4.3-7
4.3.3 Impact Analysis 4.3-8
4.3.4 Cumulative Impact Analysis 4.3-12
4.3.5 Applicable Project Requirements 4.3-14
4.3.6 Significance of Impacts Before Mitigation 4.3-15
4.3.7 Mitigation Measures 4.3-15
4.3.8 Significance of Impacts After Mitigation 4.3-16

4.4 Transportation/Traffic 4.4-1
4.4.1 Study Area Description 4.4-1
4.4.2 Existing Conditions 4.4-2
4.4.3 Basis for Determining Significance 4.4-5
4.4.4 Impact Analysis 4.4-11
4.4.5 Cumulative Impact Analysis 4.4-21
4.4.6 Significance of Impacts Before Mitigation 4.4-22
4.4.7 Mitigation Measures 4.4-23
4.4.8 Significance of Impacts After Mitigation 4.4-25

4.5 Biological Resources 4.5-1
4.5.1 Existing Conditions 4.5-1
4.5.2 Basis for Determining Significance 4.5-6
4.5.3 Impact Analysis 4.5-7
4.5.4 Cumulative Impact Analysis 4.5-10
4.5.5 Applicable Project Requirements 4.5-12
4.5.6 Significance of Impacts Before Mitigation 4.5-13
4.5.7 Mitigation Measures 4.5-13
4.5.8 Significance of Impacts After Mitigation 4.5-15

5.0 Mandatory CEQA Topics 5-1
5.1 Significant Environmental Effects Which Cannot Be Avoided if the Proposed Project is Implemented 5-1
5.2 Significant Irreversible Environmental Changes Which Would Be Caused by the Proposed Project Should It Be Implemented 5-2
5.3 Growth Inducing Impacts of the Proposed Project 5-3
5.4 Effects Found Not to be Significant as Part of the Initial Study Process 5-5

Section Name and Number **Page**

5.4.1 Aesthetics 5-6
5.4.2 Agricultural Resources 5-7
5.4.3 Cultural Resources 5-7
5.4.4 Geology/Soils 5-9
5.4.5 Hazards and Hazardous Materials 5-10
5.4.6 Hydrology/Water Quality 5-11
5.4.7 Land Use/Planning 5-13
5.4.8 Mineral Resources 5-13
5.4.9 Population and Housing 5-14
5.4.10 Public Services 5-14
5.4.11 Recreation 5-15
5.4.12 Utilities/Service Systems 5-15

6.0 Alternatives to the Proposed Project 6-1
6.1 Alternatives Under Consideration 6-2
6.2 Alternatives Considered and Rejected 6-3
6.3 Alternatives Analysis 6-5
6.3.1 Alternative 1 – No Project/Trailer Yard Alternative 6-6
6.3.2 Alternative 2 – No Project/Industrial Building Alternative 6-11
6.3.3 Alternative 3 – Reduced Project/Small Buildings Alternative 6-18
6.3.4 Alternative 4 – Reduced Project/North Building Alternative 6-23

7.0 References 7-1
7.1 EIR Preparers 7-1
7.2 Documents Incorporated by Reference 7-1
7.3 Documents and Websites Consulted 7-2
7.4 Persons Consulted/Written or Verbal Communication 7-8
7.5 Documents Appended to this EIR 7-8

EIR Technical Appendices (bound separately)

A: Initial Study, Notice of Preparation, and Written Comments on the NOP
B: Air Quality Impact Analysis
C: Mobile Source Health Risk Assessment
D: Greenhouse Gas Analysis
E: Noise Report
F: Traffic Report
G: Biological Technical Report
G1: Protocol Burrowing Owl Survey
G2: Special Status Plant Species Survey Results
H: Geotechnical Report
I: Phase 1 Environmental Assessment

LIST OF FIGURES

Figure Number and Title **Page**

Figure 2-1 Surrounding Land Uses and Development 2-3
Figure 2-2 Existing General Plan Land Use Designations 2-4
Figure 2-3 Moreno Valley Industrial Area Plan Map 2-6
Figure 2-4 Aerial Photograph 2-7
Figure 2-5 Topographic Map 2-9

Figure 3-1 Regional Map 3-8
Figure 3-2 Vicinity Map 3-9
Figure 3-3 USGS Topographic Map 3-10
Figure 3-4 Plot Plan PA12-0023 3-11
Figure 3-5 Plot Plan PA12-0023 Detail 3-12
Figure 3-6 Architectural Elevations 3-13
Figure 3-7 Conceptual Landscaping Plan 3-14

Figure 4.2-1 Summary of Projected Global Warming Impact (2070-2099) 4.2-6

Figure 4.3-1 Off-Site Noise Sensitive Receptors 4.3-28
Figure 4.3-2 Typical Noise Levels and Their Subjective Loudness and Effects 4.3-29
Figure 4.3-3 Noise Measurement Locations 4.3-30
Figure 4.3-4 March Reserve Air Base Noise Contours 4.3-31

Figure 4.4-1 Project Study Area/ Intersection Locations 4.4-41
Figure 4.4-2 Project (Passenger Car) Trip Distribution 4.4-42
Figure 4.4-3 Project (Truck) Trip Distribution 4.4-43
Figure 4.4-4 City of Moreno Valley General Plan Circulation Element 4.4-44
Figure 4.4-5 City of Moreno Valley General Plan Roadway Cross-Sections 4.4-45
Figure 4.4-6 Existing (2012) Average Daily Traffic (ADT) 4.4-46
Figure 4.4-7 Existing (2012) AM Peak Hour Intersection Volumes 4.4-47
Figure 4.4-8 Existing (2012) PM Peak Hour Intersection Volumes 4.4-48
Figure 4.4-9 Existing Number of Through Traffic Lanes and Intersection Controls 4.4-49
Figure 4.4-10 Existing (2012) Baseline I-215 Freeway Mainline Volumes 4.4-50
Figure 4.4-11 City of Moreno Valley Master Plan of Trails 4.4-51
Figure 4.4-12 City of Moreno Valley Bike Plan 4.4-52
Figure 4.4-13 City of Moreno Valley Truck Routes 4.4-53
Figure 4.4-14 City of Moreno Valley Level of Service (LOS) Standards 4.4-54
Figure 4.4-15 Cumulative Development Projects Location Map 4.4-55
Figure 4.4-16 Cumulative Development Average Daily Traffic (ADT) 4.4-56
Figure 4.4-17 Cumulative Development AM Peak Hour Intersection Volumes 4.4-57
Figure 4.4-18 Cumulative Development PM Peak Hour Intersection Volumes 4.4-58
Figure 4.4-19 Project Only Average Daily Traffic (ADT) 4.4-59
Figure 4.4-20 Project Only AM Peak Hour Intersection Volumes 4.4-60
Figure 4.4-21 Project Only PM Peak Hour Intersection Volumes 4.4-61

Figure Number and Title **Page**

Figure 4.4-22 Existing Plus Project Average Daily Traffic (ADT) 4.4-62
Figure 4.4-23 Existing Plus Project AM Peak Hour Intersection Volumes 4.4-63
Figure 4.4-24 Existing Plus Project PM Peak Hour Intersection Volumes....4.4-64
Figure 4.4-25 Opening Year (2017) Without Project Average Daily Traffic (ADT) 4.4-65
Figure 4.4-26 Opening Year (2017) Without Project AM Peak Hour Intersection Volumes....4.4-66
Figure 4.4-27 Opening Year (2017) Without Project PM Peak Hour Intersection Volumes....4.4-67
Figure 4.4-28 Opening Year (2017) With Project Average Daily Traffic (ADT)....4.4-68
Figure 4.4-29 Opening Year (2017) With Project AM Peak Hour Intersection Volumes....4.4-69
Figure 4.4-30 Opening Year (2017) With Project PM Peak Hour Intersection Volumes....4.4-70
Figure 4.4-31 Opening Year Cumulative (2017) Without Project Average Daily Traffic (ADT) 4.4-71
Figure 4.4-32 Opening Year Cumulative (2017) Without Project AM Peak Hour Intersection Volumes 4.4-72
Figure 4.4-33 Opening Year Cumulative (2017) Without Project PM Peak Hour Intersection Volumes 4.4-73
Figure 4.4-34 Opening Year Cumulative (2017) With Project Average Daily Traffic (ADT) 4.4-74
Figure 4.4-35 Opening Year Cumulative (2017) With Project AM Peak Hour Intersection Volumes 4.4-75
Figure 4.4-36 Opening Year Cumulative (2017) With Project PM Peak Hour Intersection Volumes 4.4-76
Figure 4.4-37 Existing Plus Project I-215 Freeway Mainline Volumes....4.4-77
Figure 4.4-38 Opening Year (2017) Without Project I-215 Freeway Mainline Volumes....4.4-78
Figure 4.4-39 Opening Year (2017) With Project I-215 Freeway Mainline Volumes....4.4-79
Figure 4.4-40 Opening Year Cumulative (2017) Without Project I-215 Freeway Mainline Volumes 4.4-80
Figure 4.4-41 Opening Year Cumulative (2017) With Project I-215 Freeway Mainline Volumes 4.4-81

Figure 6-1 No Project/Trailer Yard Alternative 6-7
Figure 6-2 No Project/Industrial Building Alternative....6-13
Figure 6-3 Reduced Project/Small Buildings Alternative 6-19
Figure 6-4 Reduced Project/North Building Alternative....6-24

Table Number and Title **Page**

Table F-1 List of Persons, Organizations, and Public Agencies that Commented on the Draft EIR FEIR-2
Table F-2 Errata Table of Corrections and Additions FEIR-3

Table S-1 Mitigation, Monitoring, and Reporting Program S-8

Table 1-1 Summary of NOP Comments 1-6
Table 1-2 Location of CEQA-Required Topics 1-8

Table 3-1 Matrix of Project Approvals/Permits 3-2

Table 4.1-1 State and National Criteria Pollutant Standards, Effects, and Sources 4.1-6
Table 4.1-2 Attainment Status of Criteria Pollutants in the SCAB 4.1-7
Table 4.1-3 Project Area Air Quality Monitoring Summary (2008-2010) 4.1-8
Table 4.1-4 Regional and Localized Thresholds for Criteria Pollutants 4.1-12
Table 4.1-5 Construction Equipment Assumptions 4.1-13
Table 4.1-6 Passenger Car Percentage Breakdown 4.1-15
Table 4.1-7 Heavy Duty Truck Percentage Breakdown 4.1-15
Table 4.1-8 Emissions Summary of Construction Activities (Without Mitigation) 4.1-20
Table 4.1-9 Summary of Peak Operational Emissions (Without Mitigation) 4.1-21
Table 4.1-10 Localized Significance Summary for Construction Activities (Without Mitigation) 4.1-22
Table 4.1-11 Localized Significance Summary for Operational Activities (Without Mitigation) 4.1-22
Table 4.1-12 Cumulative Cancer Risk 4.1-25
Table 4.1-13 Emissions Summary of Construction Activities (With Mitigation) 4.1-29

Table 4.2-1 Global Warming Potentials and Atmospheric Lifetime of Select GHGs 4.2-2
Table 4.2-2 Top GHG Producer Countries and the European Union 4.2-5
Table 4.2-3 Scoping Plan GHG Reduction Measures Toward 2020 Target 4.2-13
Table 4.2-4 Total Annual Project GHG Emissions 4.2-20
Table 4.2-5 Recommended Actions for Climate Change Proposed Scoping Plan 4.2-22
Table 4.2-6 Project Compliance with Applicable 2006 CAT Report GHG Emissions Reduction Strategies 4.2-26

Table 4.3-1 Off –Site Road Parameters 4.3-17
Table 4.3-2 Hourly Traffic Flow Distribution 4.3-17
Table 4.3-3 Long-Term (Ambient) Noise Level Measurements 4.3-18
Table 4.3-4 Existing Without Project Conditions Noise Contours 4.3-19
Table 4.3-5 Demolition Construction Noise Levels 4.3-19
Table 4.3-6 Site Preparation Noise Levels 4.3-20
Table 4.3-7 Grading Construction Noise Levels 4.3-20
Table 4.3-8 Building Construction Noise Levels 4.3-2
Table 4.3-9 Paving Construction Noise Levels 4.3-21

Table Number and Title **Page**

Table 4.3-10 Architectural Coating Noise Levels....4.3-21
Table 4.3-11 Existing With Project Conditions Noise Contours....4.3-22
Table 4.3-12 Year 2017 Without Project Conditions Noise Contours....4.3-23
Table 4.3-13 Year 2017 With Project Conditions Noise Contours....4.3-24
Table 4.3-14 Existing Off-Site Project Related Traffic Noise Impacts....4.3-25
Table 4.3-15 Year 2017 Off-Site Project Related Traffic Noise Impacts....4.3-26
Table 4.3-16 Reference Noise Level Measurements....4.3-27
Table 4.3-17 Project Only Stationary Source Impact Noise Level Projections....4.3-27

Table 4.4-1 Project Trip Generation Summary....4.4-26
Table 4.4-2 Roadway Segment Analysis Locations....4.4-26
Table 4.4-3 Intersection Analysis Locations....4.4-27
Table 4.4-4 Freeway Mainline Segments....4.4-27
Table 4.4-5 Freeway Merge/Diverge Ramp Junctions....4.4-27
Table 4.4-6 Existing (2012) Conditions Roadway Volume/Capacity Analysis....4.4-28
Table 4.4-7 Unsignalized Intersection LOS Thresholds....4.4-29
Table 4.4-8 Intersection Analysis for Existing (2012) Conditions....4.4-29
Table 4.4-9 I-215 Freeway Ramp Junction Merge/Diverge Analysis For Existing (2012) Baseline Conditions....4.4-29
Table 4.4-10 Existing (2012) Baseline Conditions Basic Freeway Segment Analysis....4.4-30
Table 4.4-11 Moreno Valley Roadway Segment Capacity LOS Thresholds....4.4-30
Table 4.4-12 Perris Roadway Segment Capacity LOS Thresholds....4.4-31
Table 4.4-13 Signalized Intersection LOS Thresholds....4.4-31
Table 4.4-14 Freeway Mainline LOS Thresholds....4.4-32
Table 4.4-15 Existing Plus Project Conditions Roadway Volume/Capacity Analysis....4.4-33
Table 4.4-16 Intersection Analysis for Existing Plus Project Conditions....4.4-34
Table 4.4-17 Opening Year (2017) Conditions Roadway Volume/Capacity Analysis....4.4-35
Table 4.4-18 Intersection Analysis for Opening Year (2017) Conditions....4.4-36
Table 4.4-19 Opening Year Cumulative (2017) Conditions Roadway Volume/Capacity Analysis....4.4-37
Table 4.4-20 Intersection Analysis for Opening Year Cumulative (2017) Conditions....4.4-38
Table 4.4-21 Existing Plus Project Conditions Basic Freeway Segment Analysis....4.4-38
Table 4.4-22 I-215 Freeway Ramp Junction Merge/Diverge Analysis For Existing Plus Project Conditions....4.4-38
Table 4.4-23 Opening Year (2017) Conditions Basic Freeway Segment Analysis....4.4-39
Table 4.4-24 I-215 Freeway Ramp Junction Merge/Diverge Analysis For Opening Year (2017) Conditions....4.4-39
Table 4.4-25 Opening Year Cumulative (2017) Conditions Basic Freeway Segment Analysis....4.4-40
Table 4.4-26 I-215 Freeway Ramp Junction Merge/Diverge Analysis For Opening Year Cumulative (2017) Conditions....4.4-40

Table Number and Title **Page**

Table 4.4-27 Summary of Transportation Impact Fee Program Improvements for Opening Year Cumulative (2017) Conditions 4.4-40

Table 4.5-1 Summary of Vegetation Communities/Land Uses 4.5-2

Table 5-1 SCAG Growth Forecasts for the WRCOG Region 5-5

Table 6-1 Alternatives – Comparison of Environmental Effects 6-30

ACRONYMS

Acronym	Definition
§	Section
1992 CO Plan	1992 Federal attainment Plan for Carbon Monoxide
2003 AQMP	SCAQMD's 2003 Air Quality Management Plan
AB	Assembly Bill
ADT	Average Daily Traffic
a.m.	Ante Meridiem (between the hours of midnight and noon)
AMSL	above mean sea level
APN	Assessor Parcel Number
APS	alternative planning strategy
AQMP	Air Quality Management Plan
ARB	Air Reserve Base
AST	above-ground storage tank
BMPs	best management practices
BP	Business Park/Light Industrial land use designation
C	Capacity -or- Commercial land use designation
C_2F_6	hexafluoroethane
C_2H_6	ethane
CA	California
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CA H_2 Net	California Hydrogen Highway Network
CalEEMod™	California Emissions Estimator Model™
CalEPA	California Environmental Protection Agency
CalGreen Code	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPSSA	Criteria Area Plant Species Survey Area
CARB	California Air Resources Board
CAT	Climate Action Team
CBSC	California Building Standards Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CETAP	Community & Environmental Transportation Acceptability Process
CFC	chlorofluorocarbon
CF_4	tetrafluoromethane
CH_4	methane
CHP	combined heat and power

Acronym	Definition
CIWMB	California Integrated Waste Management Board
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
COG	council of governments
COHb	carboxyhemoglobin
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
dB	decibel
dBA	A-weighted decibel
DIF	Development Impact Fee
DPM	Diesel Particulate Matter
E+A	Existing Plus Ambient Growth Conditions
E+A+C	Existing Plus Ambient Growth Plus Cumulative Conditions
E+A+C+P	Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions
E+A+P	Existing Plus Ambient Growth Plus Project Conditions
E+P	Existing Plus Project Conditions
EAP II	Energy Action Plan II
EIR	Environmental Impact Report
EMFAC	Emission FACtor model
EMWD	Eastern Municipal Water District
et seq.	*et sequentia*, meaning "and the following"
EPA	Environmental Protection Agency
EPS	emission performance standard
FAR	floor area ratio
FEIR	Final Environmental Impact Report
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
GCC	Global Climate Change
GHG	greenhouse gas
GWP	Global Warming Potential
H_2O	water vapor
HANS	Habitat Evaluation and Acquisition Negotiation Strategy
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HETs	high-efficiency toilets
HFC	hydrofluorocarbon
HPLV	High Pressure Low Volume

Acronym	Definition
HVAC	heating, ventilation, and air conditioning
HVWAP	Harvest Valley/Winchester Area Plan
I	Industrial zoning designation
I-15	Interstate 15
I-215	Interstate 215
IA	Implementing Agreement
ID	Identification
IPA	Inland Port Airport
IPCC	Intergovernmental Panel on Climate Change
ITE	Institute of Transportation Engineers
ITS	intelligent transportation systems
JPA	Joint Powers Authority
JPR	Joint Project Review
LCFS	low carbon fuel standard
Leq	equivalent level
LOS	Level of Service
LNAP	Lakeview/Nuevo Area Plan
LSTs	localized significance thresholds
MARB	March Air Reserve Base
MEISC	maximally exposed individual school child
MEIR	maximally exposed individual receptor
MEIW	maximally exposed individual worker
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MMTs	million metric tons
MND	Mitigated Negative Declaration
MPO	metropolitan planning organization
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric ton
MUTCD	Manual on Uniform Traffic Control Devices
MVAP	Mead Valley Area Plan
MVIAP	Moreno Valley Industrial Area Plan
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standards
NEPSSA	Narrow Endemic Plant Species Survey Area
No.	number
N_2	nitrogen
NO	nitric oxide
NOP	Notice of Preparation
NO_2	nitrogen dioxide
NO_X	nitrogen oxides

Acronym	Definition
N_2O	nitrous oxide
NPDES	National Pollution Discharge Elimination System
O_2	oxygen
O_3	ozone
Ord.	Ordinance
P12-064	City of Moreno Valley EIR for the First Inland Logistics Center II
PA12-0023	proposed Building Plot Plan
Pb	lead
PCBs	polychlorinated biphenyls
PCEs	Passenger Car Equivalents
PFC	perfluorocarbon
p.m.	Post Meridiem (between the hours of noon and midnight)
$PM_{2.5}$	fine particulate matter (2.5 microns or smaller)
PM_{10}	fine particulate matter (10 microns or smaller)
POLA	Port of Los Angeles
POLB	Port of Long Beach
ppb	parts per billion
ppm	parts per million
Project	First Inland Logistics Center II Project
RBBD	Road and Bridge Benefit District
RCALUC	Riverside County Airport Land Use Commission
RCCDR	Riverside County Center for Demographic Research
RCIP	Riverside County Integrated Project
RCTC	Riverside County Transportation Commission
ROG	Reactive Organic Gas
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RWQCB	Regional Water Quality Control Board
s.f.	square feet
SB	Southbound -or- Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Geotechnical
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_4	sulfates

Acronym	Definition
SO_X	sulfur oxides
SP	Specific Plan
SR-60	State Route 60
SR-91	State Route 91
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SWH	solar water heaters
SWPPP	Stormwater Pollution Prevention Plan
TIA	Traffic Impact Analysis
TRUs	Transportation Refrigeration Units
TUMF	Transportation Uniform Mitigation Fee
UNFCCC	United Nations' Framework Convention on Climate Change
USFWS	United States Fish and Wildlife Service
U.S.	United States
UST	underground storage tank
VMT	vehicle miles traveled
VOC	volatile organic compounds
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments

F.0 FINAL ENVIRONMENTAL IMPACT REPORT

F.1 INTRODUCTION TO THE FINAL ENVIRONMENTAL IMPACT REPORT (FEIR)

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.).

According to CEQA Guidelines Section 15132, the Final EIR shall consist of:

a. The draft EIR or a revision of the draft;
b. Comments and recommendations received on the draft EIR either verbatim or in summary;
c. A list of persons, organizations, and public agencies commenting on the draft EIR;
d. The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
e. Any other information added by the Lead Agency.

In accordance with the above listed requirements, this FEIR for Plot Plan PA12-0023 and associated discretionary and administrative actions actions consists of the following:

1. Comment letters and responses to public comment; and
2. The circulated First Inland Logistics Center II EIR and Technical Appendices, SCH No. 2012121011 with additions shown as underline text and deletions shown as ~~stricken~~ text in Subsection F.2.3, below.

This FEIR document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency (City of Moreno Valley).

F.2 RESPONSES TO COMMENTS

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Moreno Valley) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft EIR and to provide written responses to any substantive comments received. This Section F.0, "Final Environmental Impact Report," provides all comments received on the Draft, the City's response to each comment, and a summary of revisions made to the Draft EIR as part of the FEIR in response to the various comment letters.

A total of eight (8) comment letters were received, including letters that were received during the public comment period (which closed on July 29, 2013) and a letter that was received from the U.S. Fish & Wildlife Service on August 5, 2013, after the comment period closed. A copy of each comment letter and a response to each substantive environmental point raised in those letters is included in Subsection F.4. No comments submitted to the City of Moreno Valley on the Draft EIR have produced substantial new information requiring recirculation or additional environmental review under State CEQA Guidelines Section 15088.5.

On the following pages, each comment letter is assigned a letter reference and each substantive comment is numbered. Responses to the numbered comments follow the letters. A list of agencies, organizations, and persons that submitted comments on the Draft EIR during the public review period is presented in Table F-1, *List of Persons, Organizations, and Public Agencies that Commented on the Draft EIR*. The State Clearinghouse letter appears first, followed by letters from federal, state, regional, and local agencies, organizations, and persons.

Table F-1 List of Persons, Organizations, and Public Agencies that Commented on the Draft EIR

Comment Letter Reference	Commenting Person, Organization, or Public Agency	Date of Comment
A.	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	July 23, 2013
B.	Native American Heritage Commission	June 14, 2013
C.	Department of Transportation	July 15, 2013
D.	City of Riverside Planning Division	July 29, 2013
E.	Johnson & Sedlack	July 29, 2013
F.	Sierra Club, San Gorgonio Chapter	n.d. (received July 29, 2013)
G.	Thomas Thornsley	July 29, 2013
H.	U.S. Fish & Wildlife Service	August 5, 2013

F.2.1 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments, and notes that the focus of review and comment of Draft EIRs should be:

> *…on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible…CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or suggested by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*

CEQA Guidelines Section 15204(c) further advises that, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204(d) also notes that, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204(e) states that, "This section shall not be used to restrict the ability of reviewers to comment on the

general adequacy of a document or of the lead agency to reject comments not focused as recommended by [CEQA Guidelines Section 15204]."

In accordance with CEQA Guidelines Section 15088(b), copies of the written responses will be provided to commenting public agencies at least ten (10) days prior to certifying the FEIR. The responses will be provided with electronic copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft EIRs.

F.2.2 REVISIONS TO THE PROPOSED PROJECT IN RESPONSE TO PUBLIC COMMENTS

Since the time that the Draft EIR was circulated for public review, no substantive revisions to Plot Plan PA12-0023 were made by the Project Applicant and no changes to the proposed Project were warranted in response to any public comments received on the Draft EIR by the City of Moreno Valley.

F.2.3 CORRECTIONS AND ADDITIONS TO THE DRAFT EIR IN RESPONSE TO PUBLIC COMMENTS

Substantive changes made to the text, tables and/or exhibits of the Draft EIR in response to public comments on the Draft EIR are itemized in Table F-2, *Errata Table of Corrections and Additions*. Refer to the referenced sections and page numbers for additional detail, as not every revision is noted in the Errata Table. Additions are shown in Table F-2 as underline text and deletions shown as ~~stricken~~ text. No corrections or additions made to the Draft EIR are considered substantial new information requiring recirculation or additional environmental review under State CEQA Guidelines Section 15088.5.

Table F-2 Errata Table of Corrections and Additions

Page(s)	Section	Corrections and Additions
Page S-9	S.0, Executive Summary	The conclusion statement for Thresholds 2 and 3 in Table S-1, Mitigation Monitoring and Reporting Program, incorrectly indicated that near-term construction impacts would remain significant and unavoidable. This conclusion was not consistent with the conclusion reached in EIR Seciton 4.1, Air Quality, and has been revised as follows: Near-Term Construction (VOC and NOx emissions): Less than Significant Impact. Long-Term (NOx): Significant Unavoidable Direct and Cumulative Impact ~~(VOC and NOx (Near Term) and NOx (Long Term))~~
Figure 3-4	3.0, Project Description	In response to comments from Johnson & Sedlack (refer to Comment E-8.19) and in accordance with the California Building Standards Code, Plot Plan PA12-002, as depicted on EIR Figure 3-4, has been revised to indicate preferential passenger car parking spaces for electric vehicles (EVs), CNG vehicles, carpools, and vanpools
S-9 and 4.1-27	S.0, Executive Summary, and 4.1, Air Quality	In response to comments received from Johnson & Sedlack (refer to Comment E-7.1), Mitigation Measure MM 4.1-1 has been revised as follows: MM 4.1-1 Prior to grading permit issuance, the City shall verify that the following notes are specified on the grading plan to ensure implementation of SCAQMD Rule 403. It should be noted that the following list is non-exclusive, and identifies only key provisions of the SCAQMD Rule 403 requirements; regardless

Page(s)	Section	Corrections and Additions
		the Project shall be required to comply with all applicable provisions of SCAQMD Rule 403, whether listed below or not. Specifically, Project contractors shall be required to comply with the~~se~~ following notes and all other applicable SCAQMD Rule 403 requirements, and shall maintain written records of such compliance that can be inspected by the City of Moreno Valley upon request. a) All clearing, grading, earth-moving, and excavation activities shall cease when winds exceed 25 miles per hour. b) All unpaved roads and disturbed areas shall be watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day. c) The contractor shall ensure that traffic speeds on unpaved roads and areas where soil is exposed are reduced to 15 miles per hour or less. d) Public streets shall be swept at the end of each workday using a street sweeper meeting SCAQMD Rule 1186.1 if visible soil is carried onto paved public roads. e) The cargo area of all vehicles hauling soil, sand, or other loose earth materials shall be covered.
S-11 and 4.1-28	S.0, Executive Summary, and 4.1, Air Quality	In response to comments received from Johnson & Sedlack (refer to Responses to Comments E-7.1 through E-7.38), Mitigation Measure MM 4.1-3 has been modified as follows to reduce, to the maximum feasible extent, the Project's construction-related emissions: MM 4.1-3 Prior to grading permit and building permit issuance, the City shall verify that the following notes are specified on all grading and building plans. Project contractors shall be required to comply with these notes and permit periodic inspection of the construction site by City of Moreno Valley staff to confirm compliance. a) Mass grading shall be limited to no more than 4.0 acres per day. b) During construction activity, diesel engines shall not idle in excess of ~~five (5)~~three (3) minutes. c) All construction-related equipment ~~that is greater than or equal to 100 horsepower~~ shall be CARB ~~Tier 3~~ Certified ~~or better~~. d) Temporary traffic control for construction vehicles entering and exiting the site shall be implemented

Page(s)	Section	Corrections and Additions
		pursuant to the requirements of the California Manual on Uniform Traffic Control Devices. e) During construction activity, the operating time of all pieces of off-road diesel-powered equipment shall not exceed a combined total of 75 operating hours per day. f) Construction-related haul trips entering and existing the site shall occur during non-peak traffic hours. g) The construction contractor shall encourage construction site employees to rideshare by offering incentives or other inducements. h) High pressure injectors shall be used on all diesel powered construction equipment over 100 horsepower. i) All construction-related on-road diesel-powered haul trucks shall be 2007 or newer model year or 2010 engine compliant vehicles. j) On all construction-related equipment that has a particulate trap, the trap shall be Level 3 CARB certified. k) Electric-powered construction equipment and tools shall be used when technically feasible. l) Biodiesel fuel or other alternatives to diesel fuel shall be used to power construction equipment when technically feasible. m) Construction vehicles shall use the City's designated truck route. n) Construction parking shall be located and configured to minimize traffic interference on public streets. o) Import of earth materials and on-site grading activities shall not occur on the same day. No more than 66 loads of earth material (about 2,000 cubic yards) shall be brought to the site in any given day.
S-13 and 4.1-29	S.0, Executive Summary, and 4.1, Air Quality	The Mitigation Monitoring and Reporting Program (MMRP) included in the Public Review Draft EIR erroneously omitted Mitigation Measure MM 4.1-7; the MMRP has been revised accordingly. In addition, the following revisions were made to Mitigation Measure MM 4.1-7 in response to comments received from Johnson & Sedlack (refer to Comment E-8.1): MM 4.1-7 Prior to the issuance of occupancy permits, the Project's property owner shall provide documentation to the Planning Division verifying that provisions are included in the building's lease agreement that inform tenants about the availability of: 1) alternatively fueled cargo handling equipment; 2) grant programs for diesel fueled vehicle engine retrofit and/or replacement; 3) designated truck parking locations in the City of Moreno Valley; ~~and~~ 4) access to alternative fueling stations in the City of Moreno

Page(s)	Section	Corrections and Additions
		Valley that supply compressed natural gas (closest station is located on Indian Street, south of Nanina Avenue); and 5) the United States Environmental Protection Agency's SmartWay program.
S-13 and 4.1-30	S.0, Executive Summary, and 4.1, Air Quality	Mitigation measure MM 4.1-8 has been added to the EIR in response to comments provided by Johnson & Sedlack (refer to Comment E-8.7), as follows: MM 4.1-8 In the event that the building design is modified to accommodate refrigeration, all loading docks shall be equipped with an electrical hookup to power refrigerated tractor trailers.
S-17 and 4.3-16	S.0, Executive Summary, and 4.3, Noise	In response to comments received from Johnson & Sedlack (refer to Comment E-31), a new mitigation measure, Mitigation Measure MM 4.3-2 has been included as follows: MM 4.3-2 As a condition of the Project's building permit, the perimeter wall planned along San Michelle Road and at the corner of San Michelle Road and Perris Boulevard shall be installed early in the construction process.
S-17 through S-21 and 4.4-23 through 4.4-26	S.0, Executive Summary, and 4.4, Transportation/ Traffic	In response to comments received from Johnson & Sedlack (refer to Comment E-24), the Project Requirements (Project design features) previously identified as PR 4.4-1 through 4.4-7 have been converted to mitigation measures. Minor revisions also were made to the language included in these measures to specify a timing requirement (where appropriate) and to ensure the mitigation is enforced by the City during the Project's implementation.
S-22 and 4.5-15	S.0, Executive Summary, and 4.5, Biological Resources	In response to comments provided by the USFWS (refer to Comment H-3), the following Project Requirement has been added to the EIR as MM 4.5-2: MM 4.5-2 If clearing activities are proposed between February 1 and August 31, then within 30 days prior to vegetation clearing activities a qualified biologist shall conduct nesting bird surveys. If any nesting bird species are identified, then a construction buffer distance of 300 feet for non-listed, non-raptor species or 500 feet for listed and raptor species shall be maintained until the Project biologist certifies that the nests are no longer occupied.

F.2.4 RESPONSES TO COMMENTS

Provided in this section are the comment letters received in response to the Draft EIR, along with a response to all comments on environmental issues. Comment letters and specific comments are given letters and numbers for reference purposes.

F.3 NO RECIRCULATION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT REQUIRED

CEQA Guidelines Section 15088.5 describes the conditions under which a Draft EIR that was circulated for public review is required to be re-circulated for additional public review and comment. CEQA Guidelines Section 15088.5 states that new information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

a. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

b. 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.

c. A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

d. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

As summarized in Section F.2.2, *Revisions to the Proposed Project in Response to Public Comments*, and based on the comment letters and responses thereto presented in Section F.2.4, *Responses to Comments* , there were no public comments or changes to the text or analysis contained in the Draft EIR that resulted in the identification of any new significant environmental effect or a substantial increase in the severity of an environmental effects that were disclosed in the Draft EIR. Based on comments received on the Draft EIR, minor revisions to the Project's mitigation requirements were incorporated (as described above in Table F-2, *Errata Table of Corrections and Additions*), and all suggested mitigation measures that would clearly lessen the significant environmental impacts of the Project were incorporated into the Final EIR. Additionally, the Draft EIR was fundamentally and basically adequate, and all conclusions within the Draft EIR were supported by evidence provided within the Draft EIR or the administrative record for the proposed Project. Furthermore, public comment letters on the Draft EIR did not identify any alternatives to the proposed Project considerably different from those analyzed in the Draft EIR that would substantially lessen the significant environmental impacts of the proposed Project while still attaining the Project's basic objectives.

Based on the foregoing, additional recirculation of the Draft EIR is not warranted according to the guidance set forth in Section 15088.5 of the State CEQA Guidelines.

F.4 RESPONSES TO COMMENT

Refer to the following pages.

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

July 23, 2013

Julia Descoteaux
City of Moreno Valley
PO Box 88005
Moreno Valley, CA 92552-0805

Subject: First Inland Logistics Center II
SCH#: 2012121011

Dear Julia Descoteaux:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 22, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECE
JUL 29
CITY OF MOR
Planning

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Responses

A-1 - The City of Moreno Valley acknowledges this letter indicating that the close of public review for the Draft EIR was July 23, 2013. The City will note the assigned State Clearinghouse Number of 2012120100 on all future correspondence with the Governor's Office of Planning and Research. The City further acknowledges that the Project has complied with the State Clearinghouse review requirements for draft environmental documents, and will contact the State Clearinghouse with any questions that may arise regarding the environmental review.

Responses

Document Details Report
State Clearinghouse Data Base

SCH# **2012121011**
Project Title First Inland Logistics Center II
Lead Agency Moreno Valley, City of

Type **EIR** Draft EIR

Description The project comprises Plot Plan PA12-0023, which proposes to demolish and remove an existing truck trailer yard, grade an approximately 17.3-acre property, and construct and operate a 400,130 sf warehouse building.

Lead Agency Contact

Name Julia Descoteaux
Agency City of Moreno Valley
Phone 951 413-3209 ***Fax***
email
Address PO Box 88005
City Moreno Valley ***State*** CA ***Zip*** 92552-0805

Project Location

County Riverside
City Moreno Valley
Region
Lat / Long 33° 52' 6.4" N / 117° 13' 38.16" W
Cross Streets San Michele Road/Perris Boulevard
Parcel No. 316-200-001, 015, 019, 035 & 034
Township 3S ***Range*** 3W ***Section*** 31 ***Base*** SBB&M

Proximity to:

Highways I-215
Airports March Air Reserve Base
Railways BNSF
Waterways Lake Perris, Perris Valley Channel
Schools MVUSD, VVUSD
Land Use The current General Plan designation is Business Park and the current zoning is within the Specific Plan 208 industrial.

Project Issues Air Quality; Biological Resources; Noise; Traffic/Circulation; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 8; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 06/07/2013 ***Start of Review*** 06/07/2013 ***End of Review*** 07/22/2013

A-2

A-2 - The City of Moreno Valley acknowledges the State Clearinghouse Data Base Document Details Report.

STATE OF CALIFORNIA Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

RECEIVED
JUN 18 2013
CITY OF MORENO VALLEY
Planning Division

June 14, 2013

Ms. Julia Descoteaux, Planner
City of Moreno Valley
P.O. Box 88005
Moreno Valley, CA 92552

RE: SCH# 20012121011 CEQA Notice of Completion; draft Environmental Impact Report (DEIR)) for the **First Inland Logistics Center II Project;** located in the City of Moreno Valley; Riverside County, California.

Dear Ms. Descoteaux:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites. B-1

The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR). This area is known to the NAHC to be very culturally sensitive.

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.
Contact has been made to the Native American Heritage Commission for :a Sacred Lands File Check. A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine B-2

Responses

B-1 - The City of Moreno Valley acknowledges the Native American Heritage Commission's jurisdiction over affected Native American resources impacted by proposed projects.

B-2 - Impacts to cultural resources were determined to be less than significant as part of the Project's CEQA Initial Study process. As documented in EIR Section 5.4.3, a cultural resources inventory of the undeveloped portion of the proposed Project site was conducted by URS Corporation in 2012 that included a pedestrian survey and records search at the Eastern Information Center at the University of California, Riverside. The results of the records search determined that there are no known cultural resources within the Project site, nor have any resources been identified within a ½-mile radius of the Project site. No resources were identified during the pedestrian survey. In addition, a Mitigated Negative Declaration (MND; SCH No. 2008101041) and associated Addenda Nos. 1 and 2 were prepared to evaluate the development of an interim parking lot on the property, and concluded that the potential for uncovering resources was low. Additionally, no resources were uncovered during the site preparation activities associated with the construction of the parking lot in the southern portion of the site.

Although the surface and subsurface of the Project site do not contain any known or suspected cultural resources, Conditions of Approval are nonetheless imposed on the Project by the City that require review by a qualified archaeologist of any suspected archaeological resources that may be uncovered during ground-disturbing activities. In the event that suspected resources are uncovered, the City's Conditions of Approval for this Project require that the ground-disturbing activities be halted within the immediate vicinity of any suspected archaeological resources, and protective measures as recommended by a qualified archaeologist be implemented. With mandatory compliance with Conditions of Approval and as concluded in EIR Section 5.4.3, potential impacts to cultural resources would be reduced to a level below significance.

if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence. B-2

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. B-3

Sincerely,

Dave Singleton
Program Analyst
(916) 653-6251

CC: State Clearinghouse

Attachment: Native American Contacts list

Responses

Due to the lack of known and suspected resources and the low potential for resource discovery on the portion of the property developed as a parking lot, the City determined that additional archaeological inventory surveys were not required for the parking lot property. In preparing the January 2012 cultural resources report for the northern, undeveloped portion of the Project site, URS Corporation contacted the Native American Heritage Commission and sent letters to the 15 Native American contacts provided by the NAHC requesting interest or concerns involving the Project area. The written communication is documented in the City's administrative record for the proposed Project as Section Four of the January 2012 URS Corporation report. That report is attached as Appendix J to the Final EIR. No archaeological resources were identified on the Project site by URS Corporation and thus, no resources are documented in the January 2012 report. As such, the City did not disclose and had no potential to disclose any confidential information to the public regarding site locations, Native American human remains, or any associated funerary objects.

B-3 - Due to the partially developed nature of the Project site, absence of archaeological resources on the surface of the site, and low potential for the discovery of archaeological resources during the Project's construction activities based on evidence presented in the 2012 URS Corporation report and prior MND and MND Addenda addressing the Project site (SCH No. 2008101041), the City of Moreno Valley finds that the proposed Project does not require monitoring during ground-disturbing activities by an archaeological or Native American monitor. However, and as noted above in Response B-2, the City has imposed Conditions of Approval on the Project to address the potential discovery of cultural resources during the Project's construction. The Conditions of Approval require that a qualified archaeologist be consulted in the event that suspected historical resources, archaeological resources, paleontological resources, or human remains are uncovered during ground disturbing activities, and further requires the incorporation of measures that would ensure the appropriate treatment of any such resources, if discovered. The Conditions of Approval imposed

Responses

on the Project are consistent with and implement the provisions of CEQA Guidelines §§ 15064.5(e) and 15064.5(f).

Native American Contacts
Riverside County
June 14, 2013

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resources Manager
P.O. Box 1477 Luiseno
Temecula , CA 92593
(951) 770-8100
pmacarro@pechanga-nsn.gov
(951) 506-9491 Fax

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza , CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax

San Manuel Band of Mission Indians
Carla Rodriguez, Chairwoman
26569 Community Center Drive Serrano
Highland , CA 92346
(909) 864-8933
(909) 864-3724 - FAX
(909) 864-3370 Fax

Santa Rosa Band of Mission Indians
John Marcus, Chairman
P.O. Box 391820 Cahuilla
Anza , CA 92539
(951) 659-2700
(951) 659-2228 Fax

San Manuel Band of Mission Indians
Daniel McCarthy, M.S.., Director-CRM Dept.
26569 Community Center. Drive Serrano
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dmccarthy@sanmanuel-nsn.gov
(909) 862-5152 Fax

Morongo Band of Mission Indians
Robert Martin, Chairperson
12700 Pumarra Rroad Cahuilla
Banning , CA 92220 Serrano
(951) 849-8807
(951) 755-5200
(951) 922-8146 Fax

Serrano Nation of Mission Indians
Goldie Walker, Chairwoman
P.O. Box 343 Serrano
Patton , CA 92369

(909) 528-9027 or
(909) 528-9032

Cahuilla Band of Indians
Luther Salgado, Chairperson
PO Box 391760 Cahuilla
Anza , CA 92539
tribalcouncil@cahuilla.net
915-763-5549

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012121011; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the First Inland Logistics Center II Project; located in the City of Moreno Valley; Riverside County, California.

Responses

Native American Contacts
Riverside County
June 14, 2013

Pechanga Cultural Resources Department
Anna Hoover, Cultural Analyst
P.O. Box 2183 Luiseño
Temecula , CA 92593
ahoover@pechanga-nsn.gov
951-770-8104
(951) 694-0446 - FAX

Ernest H. Siva
Morongo Band of Mission Indians Tribal Elder
9570 Mias Canyon Road Serrano
Banning , CA 92220 Cahuilla
siva@dishmail.net
(951) 849-4676

SOBOBA BAND OF LUISENO INDIANS
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 Luiseno
San Jacinto , CA 92581
jontiveros@soboba-nsn.gov
(951) 663-5279
(951) 654-5544, ext 4137

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012121011; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the First Inland Logistics Center II Project; located in the City of Moreno Valley; Riverside County, California.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY EDMUND G. BROWN Jr. Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 8
PLANNING
464 WEST 4th STREET, 6th Floor MS 725
SAN BERNARDINO, CA 92401-1400
PHONE (909) 383-4557
FAX (909) 383-5936
TTY (909) 383-6300

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RECEIVED
JUL 17 2013
CITY OF MORENO VALLEY
Planning Division

July 15, 2013

Julia Descoteaux
Associate Planner
City of Moreno Valley
Community Development Department
14177 Frederick Street
Moreno Valley, CA 92552

Notice of Completion & Environmental Document Transmittal SCH#20121210011 Traffic Reports Appendances TAF and TAF1. (SR-215 PM R31.70)

Mrs. Descoteaux,

We have completed our review for the above mentioned project located in the southern portion of the City of Moreno Valley. West of Perris Boulevard, south of and adjacent to San Michele Road, approximately 1,150 feet east of Knox Street, and north of and adjacent to Nandina Avenue.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act (CEQA), it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Moreno Valley due to the Project's potential impact to State facilities it is also subject to the policies and regulations that govern the SHS. C-1

We recommend the following to be provided:

Traffic Study

- Exhibit 5-2 and 5-3: Existing Plus Project AM (PM) Peak Hour Intersection Volumes 9pages 73 and 74) – At the Harley Knox Blvd On-Ramp I-215 NB, the AM peak hour volume is 521 vph and the PM peak hour volume is 481 vph whereas Exhibit 5-4 on page 80 show 372 vph and 446 vph, respectively. Please verify. C-2
- Exhibit 5-2 and 5-3: Existing Plus Project AM (PM) Peak Hour Intersection Volumes 9pages 73 and 74) – At the I-215 NB Off-Ramp to Harley Knox Blvd, the AM peak hour volume is 179 vph and the PM peak hour volume is 155 vph whereas Exhibit 5-4 on page 80 show 146 vph and 103 vph, respectively. Please verify. C-3

"Caltrans improves mobility across California"

Responses

C-1 - The City acknowledges Caltrans' responsibilities as the owner and operator of the State Highway System (SHS), its role as a Responsible Agency in the CEQA process, and its obligation to assist local jurisdictions in evaluating impacts to State facilities to ensure compliance with the policies and regulations that govern the SHS. Please refer to Responses C-2 through C-9, below.

C-2 - The volumes shown on all of the turning movement volume exhibits, such as Exhibits 5-2 and 5-3, are in passenger car equivalents (PCE) and are applied to the intersection peak hour operations analysis and roadways segment analysis. PCE volumes are used in these analyses to consider the effects of heavy vehicles, such as large trucks on the roadway network.

The volumes shown on all I-215 Freeway at Harley Knox Boulevard exhibits, such as Exhibit 5-4, are in actual vehicles (not PCEs), which are used in the Basic Freeway Segment and Ramp Junction (Merge/Diverge) analyses. Actual vehicles are appropriate to use for the freeway mainline analyses because the percentage of heavy vehicles is an input parameter in the analysis tool utilized for Basic Freeway Segment and Ramp Junction (Merge/Diverge) analyses (HCS+). Because the heavy vehicles are entered as a percentage of total traffic, actual vehicles have been utilized as opposed to PCE volumes so that potential impacts due to heavy vehicles are not overstated. The use of the heavy vehicle percentage input parameter in conjunction with PCE volumes would essentially result in a double counting of heavy truck trips.

As such, the volumes shown on Exhibits 5-2 and 5-3 do not match the volumes shown on Exhibit 5-4 because the volumes shown on Exhibits 5-2 and 5-3 are in PCE while the volumes shown on Exhibit 5-4 are actual total vehicles.

C-3 - Please refer to Response C-2, above; no further response is necessary.

Mrs. Descoteaux
July 15, 2013
Page 2

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- Exhibit 6-5 and 6-6: Opening year (2017) with Project AM(PM) Peak Hour Intersection Volumes (pages 87 and 88) – At the Harley Knox Blvd On-Ramp to I-215 NB, the AM peak hour volumes is 537 vph and the PM peak hour volume is 614 vph whereas Exhibit 6-8 on page 93 show 409 vph and 489 vph, respectively, Please verify. C-4
- Exhibit 6-5 and 6-6: Opening year (2017) with Project AM(PM) Peak Hour Intersection Volumes (pages 87 and 88) – At the I-215 NB Off-Ramp to Harley Knox Blvd, the AM peak hour volume is 198 vph and the PM peak hour volume is 190 vph whereas Exhibit 6-8 on page 93 show 161 vph and 114 vph, respectively. Please verify. C-5
- Appendix 6.8: Opening Year (2017) with Project Conditions Freeway Ramp Junction Analysis Worksheets – At the I-215 SB Off-Ramp to Harley Knox Blvd (page 6.8-1), the AM peak hour volume is 234 vph whereas Exhibit 6-5 on page 87 shows 495 vph. The PM peak hour volume is 105 vph whereas Exhibit 6-6 shows 743 vph. Please verify. C-6
- Exhibit 7-5 and 7-6: Opening Year Cumulative (2017) with Project AM(PM) Peak Hour Intersection Volumes (pages 103 and 104) – At the Harley Knox Blvd On-Ramp to I-215 NB, the AM peak hour volume is 864 vph and the PM peak hour volume is 1439 vph whereas Exhibit 7-8 on page 110 show 700 vph and 1314 vph, respectively. Please verify. C-7
- Please check the turning movement, the on-ramp, the off-ramp volumes for all scenarios and revise the calculations, Exhibits, Appendix, and Tables, where needed. C-8
- Table 9-1 Summary of Transportation Impact Fee Program Improvements for Opening Year Cumulative (2017) Conditions shows recommended improvements at the I-215 and Harley Knox Blvd on and off ramps. It is stated that the project applicant will be subject to the TUMF fee program and the City of Moreno Valley Development Impact Fee Program and will pay the requisite fees. Riverside County and the City of Moreno Valley must ensure that these improvements are constructed prior to the time at which the indentified facility is expected to deteriorate to an acceptable level of service. Need to verify what these projects are and their schedule. C-9

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact Talvin Dennis at (909) 383-6908 or myself at (909) 383-4557 for assistance. C-10

Sincerely,

DANIEL KOPULSKY
Office Chief
Community and Regional Planning

"Caltrans improves mobility across California"

Responses

C-4 - Please refer to Response C-2, above; no further response is necessary.

C-5 - Please refer to Response C-2, above; no further response is necessary.

C-6 - The volumes utilized for the Basic Freeway Segment and Ramp Junction (Merge/Diverge) Analyses are consistent with the actual volumes shown on Exhibit 6-8, not the PCE volumes shown on Exhibits 6-5 and 6-6. As noted previously (refer to Response C-2), the turning volume exhibits (Exhibits 6-5 and 6-6) are in PCE while the freeway mainline volumes shown on Exhibit 6-8 are actual vehicles. For the Basic Freeway Segment and Ramp Junction (Merge/Diverge) analyses, heavy vehicles are accounted for as a percentage of total traffic as an input parameter in the analysis software (HCS+).

C-7 - Please refer to Response C-2, above; no further response is necessary.

C-8 - Freeway mainline volumes shown on the exhibits throughout the report have been verified by Urban Crossroads, Inc. for each analysis scenario against the volumes utilized in the analysis. Urban Crossroads verified that all volumes are consistent. No revisions to the report exhibits, tables, calculations or technical appendices are necessary.

C-9 - As noted in Table 9-1 of the Project's traffic study contained in EIR Technical Appendix F, the required improvements at the I-215/Harley Knox Boulevard on- and off-ramps are fully accounted for by the TUMF Nexus fee program. Based on information obtained from the WRCOG, the I-215/Harley Knox Interchange is included in TUMF for improvement with a $10.9 million construction budget, and the WRCOG believes that this budget amount is sufficient to fully improve the ramps and approaches (WRCOG, 2013). TUMF funds are collected for improvements

Responses

necessitated by growth with a 2035 time horizon and improvements are expected to be in place in the intervening years. However, no schedule is prescribed by the TUMF program. At the present time, there is no current planning effort underway by either the City of Perris or Caltrans to improve the interchange; however, the City of Perris expects planning to get underway in the next five years (Perris, 2013). The Western Riverside Council of Government's (WRCOG's) TUMF program was established to provide funding for infrastructure improvements warranted by development projects in the region that contribute vehicular traffic to the circulation network. As stated in the TUMF Nexus Study (2012, page 10), "the idea behind a uniform mitigation fee is to have new development throughout the region contribute equally to paying the cost of improving the transportation facilities that serve longer distance trips between communities. Thus, the fee should be used to improve transportation facilities that serve trips between communities within the region (primarily arterial roadways) as well as the infrastructure for public transportation." The TUMF Nexus Study (2012), which is herein incorporated by reference and available online at http://www.wrcog.cog.ca.us/tumf/nexus/tumf.pdf, establishes a nexus or reasonable relationship between the TUMF fee's use and the type of project for which the fee is required. Using the 2013/14 fee schedules, the proposed Project would be obligated to pay $429,094.00 in TUMF fees. An annual inflation adjustment is considered by WRCOG each year in January.

CEQA allows for the assessment of a fee as an appropriate form of mitigation when it is linked to a specific mitigation program. In this case, the TUMF is an established mitigation program and WRCOG's member agencies have successfully implemented many transportation improvements under the TUMF program. Based on the requirements of TUMF, the obligation of WRCOG to collect TUMF fees, and the obligations of the City of Perris and/or Caltrans to plan for and implement TUMF-funded improvements at the on- and off-ramps at I-215/Harley Knox Boulevard, there is assurance that the Project's TUMF payment is adequate mitigation for the Project's contribution of traffic to the

Responses

cumulative impact forecasted to occur at that interchange in the future. A fair share monetary contribution to a mitigation fund is adequate mitigation if the funds are part of a reasonable plan that the relevant agency (in this case City of Perris and/or Caltrans) is committed to implementing. As previously noted, although planning for the interchange improvement has not yet begun, the City of Perris expects to begin such work in the next five years. The City of Perris' commitment to roadway improvements is also evidenced by their creation of the North Perris Road and Bridge Benefit District (NPRBBD) in 2007, which includes Harley Knox Boulevard. The NPRBBD is a consolidation of TUMF, DIF and other facilities within a specific boundary. The program enables the City of Perris to retain a predetermined portion of the TUMF generated within the NPRBBD boundaries to improve facilities within the boundaries rather than forward the full TUMF to WRCOG for future distribution. The Harley Knox Boulevard/I-215 interchange is included in the NPRBBD program boundaries.

Although the EIR and EIR Appendix F acknowledge that the Project would result in cumulatively significant impacts at the I-215/Harley Knox Boulevard on- and off-ramps under Opening Year Cumulative (2017) conditions, the identified LOS deficiency occurs as a result of cumulative development and is not directly caused by the Project's traffic alone (as demonstrated in Table 6-1 of the Project's Traffic Study). As such, it is inappropriate to tie the improvement's timing to the proposed Project. As noted in Table 4-3 of EIR Appendix F, the Opening Year Cumulative (2017) analysis considers the implementation of 52 other cumulative development projects in the vicinity of the Project site. Each of these cumulative developments would also be required to contribute TUMF fees to address improvements needed to regional facilities, such as the I-215/Harley Knox ramps. If enough cumulative development occurs in addition to development of the Project to cause the LOS deficiency, and assuming that all of the implemented projects pay their mandatory TUMF fee, then WRCOG would be responsible for allocating funding for the requisite improvements to the I-215/Harley Knox Boulevard on- and off-

Responses

ramps. The timing of improvements needed to the I-215/Harley Knox Boulevard on- and off-ramps will be determined by WRCOG and the City of Perris in part by the pace at which cumulative development projects are implemented and NPRBBD and TUMF funds are collected. WRCOG conducts on-going monitoring of the regional circulation system and plans for the distribution of TUMF funds as deficiencies in the regional and local transportation network are identified or anticipated. Congested areas are generally considered higher priorities than uncongested areas. In conclusion, the Project's payment of TUMF fees is adequate mitigation for its cumulative contribution of traffic to the Harley Knox Boulevard/I-215 interchange and there is reasonable assurance that WRCOG, the City of Perris and Caltrans will implement the improvement as called for by the TUMF and NPRBBD programs.

C-10 - The City will direct any questions regarding this letter to Talvin Dennis or Daniel Kopulsky at the contact information provided.

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Planning Division

City of Arts & Innovation

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July 29, 2013

Julia Descoteax, Associate Planner
City of Moreno Valley
Community & Economic Development Department
14177 Fredrick Street
Moreno Valley, CA 92553

SUBJECT: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR FIRST INLAND LOGISTICS CENTER II

Dear Ms. Descoteaux:

Thank you for the opportunity to review and comment on the Notice of Availability of a Draft Environmental Impact Report (DEIR) for First Inland Logistics Center II. The project is situated in the City of Moreno Valley to the southeast of the City of Riverside, west of March Air Reserve Base and north and northeast of the City of Perris. It is bounded by Perris Boulevard, Nandina Avenue and San Michele Road. The proposal involves demolition of an existing 8.4 acre truck-trailer storage yard in order to construct a 400,130 square feet warehouse building having 59 loading bays and 6,000 square feet of office area. D-1

In a January 14, 2013 letter to you, the City of Riverside commented on a Notice of Preparation of a Draft Environmental Impact Report for this project. As mentioned in our comment letter then, the project is located close to the Interstate Highway 215 corridor and therefore has a potential to generate significant traffic impacts to the City of Riverside. In light of those possible impacts, I would like to reiterate below the City's concerns as stated in our comment letter for your further consideration: D-2

First, an earlier Draft Environmental Impact Report (DEIR) prepared for the Prologis Eucalyptus Industrial Park in 2012 concluded that segments of State Route 60 currently operate at an unacceptable Level of Service (LOS). Construction of the subject First Inland Logistics Center II will only worsen the existing unacceptable Level of Service along those segments of the Highway. Traffic will spill over onto other roadways including those located within the City of Riverside. The Environmental Impact Report should include a detailed analysis and mitigation measures that address the spill over impacts along roadways situated within the City of Riverside. D-3

3900 Main Street • Riverside, CA 92522 • tel 951.826.5371 • fax 951.826.5981 • www.riversideca.gov

Responses

D-1 - The description of the proposed Project and its location as provided by this comment are accurate; no response is necessary.

D-2 - The City is in receipt of the January 14, 2013 comment letter, a copy of which is included in Technical Appendix A to the EIR and was considered during preparation of the EIR. Please refer to Responses D-3 through D-4.g for responses to the individual comments expressed in this letter.

D-3 - The study area used in the Project's traffic impact analysis was defined in conformance with the requirements of the City's *Traffic Impact Analysis Preparation Guide* (August 2007) and Caltrans' *Guide for the Preparation of Traffic Impact Studies* (December 2002). In accordance with Caltrans' traffic study guidelines, the freeway mainline analysis locations include those freeway segments where the Project is anticipated to contribute 100 or more two-way peak hour trips (see Section 1.3.3 of Technical Appendix F). Where the Project generates less than 100 peak hour trips, no impact to state facilities occurs. Based on the analysis contained in Technical Appendix F, it was determined that the Project would contribute 100 or more two-way peak hour trips to four freeway segments (I-215 northbound and southbound segments located northerly and southerly of Harley Knox Boulevard). The Project will not generate 100 or more two-way peak hour trips to any segment of State Route 60 (SR-60). Accordingly, and in conformance with Caltrans' traffic study guidelines, the Project would result in a less-than-significant impact to SR-60, and would therefore not result in significant secondary impacts to City of Riverside roadways as a result of traffic congestion on SR-60.

EIR Section 4.4.1, "Study Area Description," states "[b]ased on a comparison of the trip generation information provided in Table 4.4-1, *Project Trip Generation Summary*, with the trip distribution patterns depicted on Figure 4.4-2, *Project (Passenger Car) Trip Distribution*, and Figure 4.4-3, *Project (Truck) Trip Distribution*, the proposed Project

Responses

would not contribute more than 50 peak hour trips to any road segments or intersections located within the City of Riverside or unincorporated Riverside County; thus, intersections and roadway segments in those jurisdictions do not warrant analysis."

Additional consideration has been given to the likelihood of potential Project impacts resulting from the potential "spill over" onto City of Riverside arterial roadways during congested peak hour conditions on I-215. Based on the trip distribution and trip generation assumptions presented in the Project's traffic report, the Project is anticipated to contribute a total of 51 peak hour (Passenger Car Equivalent or PCE) trips to I-215 north of Harley Knox Boulevard during either the AM or PM peak hour. As such, 100% of Project traffic oriented to and from the I-215 north of Harley Knox Boulevard would need to "spill over" onto the same arterial roadway within the City of Riverside to meet the City of Riverside's stated traffic impact threshold of 50 or more peak hour trips. The probability of 100% of the Project's I-215 traffic oriented north of Harley Knox Boulevard choosing to use the exact same alternative route to the I-215 Freeway at the exact same time during typical peak hour conditions is extremely low and highly speculative. The commenter does not provide any substantial evidence to include that a 100% spill over scenario has any likelihood to occur.

Second, the City of Riverside continues to ask that the technical traffic studies prepared as attachments to the EIR include the following studies:

a. Evaluation and mitigation of impacts to City of Riverside streets and roadways based on the fact that the Mid-County Parkway project will no longer be built west of the I-215 Freeway and the fact that the proposed corridor improvements along Cajalco Road will not be completed prior to construction of the proposed project;

b. Evaluation and mitigation of the impacts to the regional transportation system from the truck transport of goods originating from other locations to the project site and from the project site to other locations, including impacts to arterials within the City of Riverside;

c. Evaluation and mitigation of the impacts to the regional transportation system from the truck transport of goods originating from the project site to other locations, including impacts to arterials within the City of Riverside;

d. Identification of appropriate mitigation measures to reduce any impact to the City of Riverside and maintain the current level of service (LOS) of all roadways and intersections within the City of Riverside;

e. Evaluation and mitigation of the cumulative impacts of the project based on proposed and recently completed projects within the vicinity of the project site, including those within Cities of Riverside, Perris, Moreno Valley, the March Joint Powers Authority, and the County of Riverside;

f. Assessments of traffic impacts generated by passenger vehicles and delivery trucks (those that would normally travel west along State Route 60 toward the Interstate 215/State Route 91 interchange) that will find the "path of least resistance" when the freeways are congested and take routes on City of Riverside arterials such as Van Buren Boulevard and Alessandro Boulevard to access State Route 91 and

g. Identify specific mitigation or fair share contribution toward mitigation (beyond TUMF) that may be needed to address any impacts to the City of Riverside.

D-4

City of Riverside staff appreciates your consideration and cooperation on this project and looks forward to future updates. Should you have any questions regarding this letter, please feel free to contact Herman Mukasa, AICP, Associate Planner, at (951) 826-5628 or by e-mail at hmukasa@riversideca.gov.

D-5

Sincerely,

Steve Hayes, AICP
City Planner

Responses

D-4a - As noted above in Response D-3, the study area used in the Project's traffic study was defined based on the City's *Traffic Impact Analysis Preparation Guide* (August 2007), which states that the area to be studied "…shall include any intersection of 'Collector' or higher classification street, with 'Collector' or higher classification streets, at which the proposed project will add 50 or more peak hour trips" (City of Moreno Valley Traffic Impact Analysis Preparation Guide, 2007, p. 4). The "50 peak hour trip" criteria utilized by the City of Moreno Valley is consistent with the methodology employed by other jurisdictions throughout Riverside County, and generally represents a threshold of trips at which a typical intersection would have the potential to be impacted. In fact, the 50 peak hour trip criteria also is relied upon by the City of Riverside's *Traffic Impact Analysis Preparation Guide* (August 2012), which indicates that "…the area to be studied shall generally include any intersection of 'Collector' or higher classification streets on which the proposed project will add 50 or more peak hour trips up to a 5 mile radius of the project location" (City of Riverside, 2012, p. 3).

The study area identified by the Project's traffic impact analysis is depicted on Exhibit 1-2 of Technical Appendix F. The study area accounts for all intersections that would be potentially impacted by receiving 50 or more peak hour trips from the proposed Project. As shown on Exhibit 1-2 of Technical Appendix F, the Project would not contribute 50 or more peak hour trips to any intersection located within the City of Riverside. Therefore, in conformance with the City's *Traffic Impact Analysis Preparation Guide* (August 2007), and consistent with the study area requirements specified in the City of Riverside's *Traffic Impact Analysis Preparation Guide* (August 2012), the Project's traffic impact analysis properly defines the study area, which does not include any transportation facilities located within the City of Riverside. Because no facilities in the City of Riverside would receive 50 or more peak hour trips from the proposed Project, any impact to City of Riverside facilities would be less than significant and less than cumulatively considerable; thus, a detailed

Responses

analysis is not warranted.

D-4b - The Project's Traffic Study (EIR Appendix F) includes an analysis of impacts to the regional transportation system, based on the City's *Traffic Impact Analysis Preparation Guide* (August 2007) and Caltrans' *Guide for the Preparation of Traffic Impact Studies* (December 2002). The Traffic Study accounts for trips coming to and departing from the Project site. As noted above in Responses D-3 and D-4.a, the Project does not contribute 50 or more peak hour trips to any facility located within the City of Riverside, nor does the Project contribute more than 100 peak hour trips to any freeway facility within or adjacent to the City of Riverside. Accordingly, the Project would have no impacts to transportation facilities located within the City of Riverside.

D-4c - Refer to Responses D-3, D-4a, and D-4b; no further response is necessary.

D-4d - Refer to Responses D-3, D-4., and D-4b; no further response is necessary.

D-4e - The Project's traffic study contained as Technical Appendix F includes an analysis of cumulative effects. As noted in Table 4-3 of Technical Appendix F, the Opening Year Cumulative (2017) analysis assumes the implementation of 52 cumulative development projects, including projects within the City of Moreno Valley, March Joint Powers Authority, unincorporated Riverside County, the City of Riverside, and the City of Perris. However, and for the reasons stated in Responses D-3, D-4a, and D-4b, the Project has no potential to result in direct or cumulatively considerable impacts to any transportation facility within the City of Riverside; thus, mitigation is not warranted.

D-4f - As noted in Responses D-3, D-4a, and D-4b, the Project has no potential to result in significant direct or cumulatively considerable impacts to SR-60 or any City of Riverside transportation facility including

c: Scott Barber, City Manager
Deanna Lorson, Assistant City Manager
Kristi Smith, Supervising Deputy City Attorney
Al Zelinka, Community Development Director
Emilio Ramirez, Deputy Community Development Director
Tom Boyd, Public Works Director/City Engineer
Rob Van Zanten, Principal Engineer
Steve Libring, City Traffic Engineer

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Responses

but not limited to Van Buren Boulevard, Alessandro Boulevard, and other City of Riverside arterials.

D-4g - As noted in Responses D-3, D-4a, and D-4b, the Project would not result in any significant direct or cumulatively considerable impacts to transportation facilities in the City of Riverside. Accordingly, mitigation measures beyond mandatory payment of TUMF fees are not warranted to address City of Riverside facilities.

D-5 - If questions arise regarding this letter, the City of Moreno Valley will contact Herman Mukasa, AICP, at the contact information provided.

RESPONSES

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 1 of 13

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FAX COVER SHEET

DATE: July 29, 2013

TO: JULIA DESCOTEAUX, ASSOCIATE PLANNER
COMPANY: CITY OF MORENO VALLEY
DEPARTMENT: Community & Economic Development Department
Planning Division
FAX: (951) 413-3210

FROM: RAYMOND W. JOHNSON, ESQ. AICP
PHONE: 951-506-9925
FAX: 951-506-9725

RE: FIRST INLAND LOGISTICS CENTER II

CASE NUMBER: PLOT PLAN PA12-0023

Number of pages including cover sheet: 13

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

COMMENTS:

Comment Letter attached.
Hard copy follows in US Mail.

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From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 2 of 13

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July 29, 2013

Julia Descotcaux
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VIA FACSIMILE AND US MAIL

RE: Comments on Draft EIR: First Inland Logistics Center II (Plot Plan PA 12-0023)

Greetings:

Please consider these comments submitted on behalf of concerned area residents concerning the Draft Environmental Impact Report for the First Inland Logistics Center II Project. E-1

The Project proposes to construct a new 400,130-square foot logistics center warehouse building on a 17.3-acre property designated "Industrial." The northern half of the site (8.9 acres) is undeveloped vacant land. The southern half of the site (8.4 acres) is developed as a parking lot used for truck trailer parking. The project site is located immediately west of North Perris Boulevard, south of and adjacent to San Michele Road in the City of Moreno Valley. The project proposes a total of 59 loading bays for loading, unloading and short term parking of truck trailers. A total of 159 passenger car parking spaces will be provided and 63 spaces for trailer parking. The project will involve the demolition of an existing parking lot, generating approximately 12,800 cubic yards of debris, which will be reused according to the Draft EIR. The entire parcel will be graded resulting in 13,300 cubic yards of cut and 42,000 cubic yards of fill. Import of between 28,000 and 30,000 cubic yards of earth material is anticipated; the borrow site is not determined but "will be located in close proximity" to the project site according to the Draft EIR. Construction will occur over a period of eight months, eight hours a day, five days a week according to the Draft EIR. The Draft EIR assumes the building will be operational 24 hours per day. The Draft EIR assumes the project will create 191 jobs, although a specific tenant has not been identified. E-2

RESPONSES

E-1 - Comment acknowledged. The concerned residents to whom this comment refers are not identified.

E-2 - The description of the proposed Project as provided in this comment is accurate.

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 3 of 13

July 29, 2013
Page 2

As you are aware, CEQA is an informational document designed to disclose to the public and decision-makers the significant impacts of proposed projects as well as to identify mitigation measures and alternatives designed to lessen those significant effects. In fact, Public Resources Code § 21002 prevents a lead agency from approving a project where feasible alternatives and mitigation measures exist. Unfortunately in this instance the Draft EIR fails to adopt feasible mitigation measures. Also, as a feasible and environmentally superior alternative exists, this alternative must be adopted. E-3

It is noteworthy that mitigation exists for mobile emission impacts through, for example, the required use, or phased in use, of clean fuel technologies and cleaner trucks. Where there is no particular tenant identified for the project at this time, the project presents an excellent opportunity to require the use of technologies designed to substantially reduce air emissions. We strongly urge the City to require the adoption of such beneficial measures. E-4

Air Quality Impacts

An overall problem with the Draft EIR is that it reaches the conclusion that impacts are significant and unavoidable without first adopting all feasible mitigation measures. This is a violation of CEQA. E-5 In the area of air quality, impacts are determined to be significant and unavoidable with respect to VOC and NO_x as to construction phases and NO_x as to operational phases; however, feasible mitigation measures exist to lessen these impacts, such as the following: E-6

Construction Impacts

1. Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.
2. Install and maintain trackout control devices in effective condition at all access points where paved and unpaved access or travel routes intersect (eg. Install wheel shakers, wheel washers, and limit site access.)
3. All roadways, driveways, sidewalks, etc., should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
4. Pave all construction roads.
5. Pave all construction access roads at least 100 feet on to the site from the main road.
6. Limit fugitive dust sources to 20 percent opacity.
7. Require a dust control plan for earthmoving operations.
8. When materials are transported off-site, all material shall be covered, effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
9. All streets shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers utilizing reclaimed water trucks if visible soil materials are carried to adjacent streets.
10. The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite.

E-7

Responses

E-3 - The City acknowledges the purpose of CEQA in the review of proposed projects and the need to identify mitigation measures and alternatives to lessen significant project-related effects. However, and for the reasons noted below under Responses E-5 through E-36, the City respectfully disagrees with the Commenter's allegation that the EIR fails to identify feasible mitigation measures, and also disputes the Commenter's assertion that a feasible environmentally superior alternative exists that must be adopted.

E-4 - The Commenter supplies no substantial evidence in this comment that the use of clean fuel technologies and cleaner trucks are feasible for the proposed Project, nor does Commenter supply a definition of such technologies or clean trucks In preparing the EIR and setting forth feasible mitigation measures for the topic of air quality, the City relied on three Project-specific technical reports (EIR Technical Appendices B, C, and D), as well as the reference sources cited therein and in EIR Section 7.0, References.

E-5 - The Commenter incorrectly characterizes the purpose of an EIR. An EIR does not "adopt" mitigation measures, but rather sets forth feasible measures for lead and responsible agencies to consider for adoption to avoid and reduce environmental effects when they deliberate on whether or not to approve a project. The EIR does not violate CEQA. For the reasons noted below under Responses E-6, E-7 and E-8 the City disagrees with the Commenter's allegation that the City has failed to identify adequate and feasible mitigation measures.

E-6 - In Comments E-7 and E-8, Commenter provides a list of 98 items for the City to consider to further reduce the proposed Project's significant effects on air quality. Commenter does not provide any substantial evidence regarding the feasibility of these suggestions and does not provide any evidence to indicate to what level of emissions reduction and air quality improvement, if any, the 98 suggestions would achieve.

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 4 of 13

July 29, 2013
Page 3

11. Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 24 hours.
12. Extend grading period sufficiently to reduce air quality impacts below a level of significance.
13. The simultaneous disturbance of the site shall be limited to five acres per day.
14. Any vegetative cover to be utilized onsite shall be planted as soon as possible to reduce the disturbed area subject to wind erosion. Irrigation systems required for these plants shall be installed as soon as possible to maintain good ground cover and to minimize wind erosion of the soil.
15. Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered three times daily.
16. Any site access points within 30 minutes of any visible dirt deposition on any public roadway shall be swept or washed.
17. A high wind response plan shall be formulated for enhanced dust control if winds are forecast to exceed 25 mph in any upcoming 24-hour period.
18. Implement activity management techniques including a) development of a comprehensive construction management plan designed to minimize the number of large construction equipment operating during any given time period; b) scheduling of construction truck trips during non-peak hours to reduce peak hour emissions; c) limitation of the length of construction work-day period; and d) phasing of construction activities.*
19. Develop a trip reduction plan to achieve a 1.5 AVR for construction employees
20. Require high pressure injectors on diesel construction equipment.*
21. Restrict truck operation to "clean" trucks, such as a 2007 or newer model year or 2010 compliant vehicles.*
22. Require the use of CARB certified particulate traps that meet level 3 requirements on all construction equipment.*
23. Utilize only CARB certified equipment for construction activities.*
24. The developer shall require all contractors to turn off all construction equipment and delivery vehicles when not in use and/or idling in excess of 3 minutes.*
25. Restrict engine size of construction equipment to the minimum practical size.*
26. Use electric construction equipment where technically feasible.*
27. Substitute gasoline-powered for diesel-powered construction equipment.*
28. Require use of alternatively fueled construction equipment, using, e.g., compressed natural gas, liquefied natural gas, propane, or biodiesel.*
29. Use methanol-fueled pile drivers.*
30. Install catalytic converters on gasoline-powered equipment.*
31. Require the use of Alternative Diesel Fuels on diesel equipment used. Alternative diesel fuels exist that achieve PM10 and NOx reductions. PuriNOx is an alternative diesel formulation that was verified by CARB on January 31, 2001 as achieving a 14% reduction in NOx and a 63% reduction in PM10 compared to CARB diesel. It can be used in any direct-injection, heavy-duty compression ignition engine and is compatible with existing engines and existing storage, distribution, and vehicle fueling facilities. Operational experience indicates little or no difference in performance and startup time, no discernable operational differences, no increased engine noise, and significantly reduced visible smoke.

E-7

Responses

Although CEQA does not require the lead agency to analyze a list of every imaginable mitigation measure, Responses E-7 and E-8 address the feasibility and practicality of each suggestion made by the Commenter. Responses E-7 and E-8 also note which of Commenter's suggestions are duplicative of mandatory regulatory requirements or of mitigation measures already set forth in the EIR.

E-7.1 - As concluded in the EIR, the short-term air emissions that would occur during construction of the Project would exceed the SCAQMD regional thresholds for VOCs and NOx. There is no evidence to suggest that the Commenter's recommendation would reduce either VOC or NOx emissions. This type of measure typically addresses emissions of particulate matter (PM10; e.g., fugitive dust), which the EIR concludes is a less than significant impact. Mitigation measures are not required for impacts that are less than significant. Nonetheless, to address fugitive dust emissions and as disclosed in EIR Project Requirements PR 4.1-2 and PR 4.1-5, the Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" and Rule 1186, "PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations." The City is not obligated to impose mitigation measures that are duplicative of mandatory regulatory requirements to which the Project is required to adhere. Regardless, to ensure compliance with SCAQMD Rule 403, the EIR sets forth Mitigation Measure MM 4.1-1, which contains a non-exclusive list of some of the Rule 403 requirements. For clarity in the Final EIR, MM 4.1-1 has been revised state that the list is non-exclusive and that full compliance to Rule 403 is required. Refer to Appendix B to EIR Technical Appendix B, Table 1, "Fugitive Dust Best Available Control Measures" for a detailed list of the requirements of Rule 403 that apply to the Project. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.2 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

Responses

E-7.3 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.4 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.5 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.6 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403. The requirements of Rule 403 explicitly state that "no person shall cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that the dust emission exceeds 20 percent opacity (as determined by the appropriate test method included in the Rule 403 Implementation Handbook), if the dust emission is the result of movement of a motorized vehicle."

E-7.7 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.8 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.9 - Refer to Response E-7.1. Additionally, refer to EIR Mitigation Measure 4.1-1(d), which specifically sets forth Commenter's suggestion as a mitigation measure.

E-7.10 - Refer to Response E-7.1. Monitoring of SCAQMD Rule 403 compliance is the responsibility of the Construction Contractor, City of Moreno Valley, and SCAQMD, as specified the EIR's Mitigation Monitoring Program.

E-7.11 - Refer to Response E-7.1. Additionally, refer to EIR Mitigation

Responses

Measure 4.1-2, which specifically sets forth Commenter's suggestion as a mitigation measure.

E-7.12 - Refer to Mitigation Measure 4.1-3(a), which requires that mass grading be limited to no more than 4.0 acres per day. Extending the grading period to a longer period of time is not warranted, as there is no evidence to suggest that lengthening the grading period would reduce emissions of VOCs and NOx emissions. In fact, lengthening the grading period may increase NOx emissions, because construction equipment would be operating on the property for a greater number of days.

E-7.13 - Refer to Mitigation Measure 4.1-3(a), which requires that mass grading be limited to no more than 4.0 acres per day.

E-7.14 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.15 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.16 - Refer to Response E-7.1. The Commenter's recommendation is covered by mandatory compliance with SCAQMD Rule 403.

E-7.17 - Refer to Response E-7.1. Additionally, refer to EIR Mitigation Measure 4.1-1(a), which specifically sets forth Commenter's suggestion as a mitigation measure.

E-7.18 - As shown on EIR Table 4.1-13, with implementation of Mitigation Measures MM 4.1-1 through MM 4.1-3, all construction-related air quality impacts would be reduced to below a level of significance, including NOx and VOC emissions, for which mitigation measures are set forth to reduce those emissions to below SCAQMD significance thresholds. Regarding Commenter's suggestions:

a) Table 3-1 in EIR Technical Appendix B specifies the types of large

Responses

construction equipment, by construction phase, that are anticipated to be used during Project construction and that were analyzed in the EIR. To ensure that the analyzed emission levels from the assumed construction fleet is not exceeded, Mitigation Measure 4.1-3(e) has been added to the Final EIR, as follows: "During construction activity, the operating time of all pieces of off-road diesel-powered equipment shall not exceed a combined total of 75 operating hours per day."

b) Mitigation Measure 4.1-3(f) has been added to the Final EIR as follows "Construction-related haul trips entering and exiting the site shall occur during non-peak traffic hours."

c) Refer to Mitigation Measure 4.1-3(a), which requires that mass grading be limited to no more than 4.0 acres per day. Also refer to Mitigation Measure 4.1-3(e) that has been added to the Final EIR and applies a limit to the number of combined operating hours that diesel-powered equipment can operate per day. Further, the City's Noise Ordinance limits the hours during which construction is permitted to occur. Further shortening the work day would result in construction activity occurring over a greater number of days, which would increase the potential for other environmental effects to be extended, such as erosion, dust, and noise.

d) The proposed Project involves the construction of one (1) building. As described in EIR Section 3.3.5(F) and analyzed in the EIR, construction would occur in several phases: demolition, grading, utility installation, building construction, landscaping, and finish site improvements. Because only one (1) building is proposed, it is not feasible to further phase construction activity.

E-7.19 - Pursuant to California Health and Safety Code Section 40717.9, no public agency shall require an employer to implement an employee trip reduction program unless the program is required by federal law. Accordingly, pursuant to Health and Safety Code Section 40717.9, the City is not authorized to effectively mandate that the tenant/owner implement mandatory employee carpooling." Regardless, Mitigation Measure 4.1-3(g) has been added to the Final EIR as follows "The

Responses

construction contractor shall encourage construction site employees to rideshare by offering incentives or other inducements." While the Commenter's recommendation to develop a trip reduction plan for construction workers would be feasible, adherence to such a plan would not be feasible to enforce or monitor and is not required by federal law; thus, there would be no enforceable benefit to preparing such a plan. Commenter offers no evidence to suggest that implementation of a trip reduction plan for construction workers is feasible or enforceable. Furthermore, the largest component of NOx air emissions during the construction phase is from diesel-powered equipment, not from on-road vehicles used by workers commuting to and from the site. Refer to Mitigation Measure 4.1-3(e) that has been added to the Final EIR and applies a limit to the number of combined operating hours that diesel-powered equipment can operate per day.

E-7.20 - Mitigation Measure 4.1-3(h) has been added to the Final EIR as follows "High pressure injectors shall be used on all diesel powered construction equipment over 100 horsepower."

E-7.21 - Mitigation Measure 4.1-3(i) has been added to the Final EIR as follows "All construction-related on-road diesel-powered haul trucks shall be 2007 or newer model year or 2010 engine compliant vehicles."

E-7.22 - Commenter's recommendation is not realistic. There are very few pieces of construction equipment that have particulate traps, so Commenter's recommendation to require CARB certified particulate traps on all construction equipment is not possible. Mitigation Measure 4.1-3(j) has been added to the Final EIR as follows "On all construction-related equipment that has a particulate trap, the trap shall be Level 3 CARB certified."

E-7.23 - Mitigation Measure 4.1-3(c) has been expanded to specify that all construction-related equipment be CARB Certified.

Responses

E-7.24 - The idling time limitation specified in Mitigation Measure 4.1-3(b) has been reduced from 5 minutes to 3 minutes in the Final EIR.

E-7.25 - Mitigation Measure 4.1-3(e) has been added to the Final EIR, as follows: "During construction activity, the operating time of all pieces of off-road diesel-powered equipment shall not exceed a combined total of 75 operating hours per day." This measure would achieve the same result as Commenter's recommendation to restrict engine size of construction equipment.

E-7.26 - Mitigation Measure 4.1-3(k) has been added to the Final EIR as follows "Electric-powered construction equipment and tools shall be used when technically feasible."

E-7.27 - Commenter's recommendation is not feasible because there are very few pieces of commercially available construction equipment that use gasoline. Mitigation Measure 4.1-3(e) added to the Final EIR will apply a limitation on the number of operating hours per day that diesel-powered equipment can operate, which will achieve the same result as this recommendation.

E-7.28 - Mitigation Measure 4.1-3(l) has been added to the Final EIR as follows "Biodiesel fuel or other alternatives to diesel fuel shall be used to power construction equipment when technically feasible."

E-7.29 - Commenter's recommendation is not feasible because methanol-fueled pile drivers are not commercially available. Mitigation Measure 4.1-3(e) added to the Final EIR will apply a limitation on the number of operating hours per day that diesel-powered equipment can operate, which will achieve the same result as this recommendation.

E-7.30 - Commenter's recommendation is not feasible because there are very few pieces of commercially available construction equipment that use gasoline. As such, gasoline-powered construction equipment is not

Responses

anticipated to be used at the Project site.

E-7.31 - Mitigation Measure 4.1-3(l) has been added to the Final EIR as follows "Biodiesel fuel or other alternatives to diesel fuel shall be used to power construction equipment when technically feasible."

E-7.32 - Mitigation Measure 4.1-3(k) has been added to the Final EIR as follows "Electric-powered construction equipment and tools shall be used when technically feasible."

E-7.33 - As noted in EIR Table 4.1-5, the only phase of the construction process during which forklifts would be used is during construction of the building. Commenter's recommendation is not realistic because there are very few construction contractors that own or have access to alternatively fueled fork lifts. Mitigation Measure 4.1-3(e) added to the Final EIR will apply a limitation on the number of operating hours per day that diesel-powered equipment can operate, which will achieve the same result as this recommendation.

E-7.34 - Smog alerts are infrequent and when they occur, last the duration of the day. The historical trends available from the SCAQMD at: http://www.aqmd.gov/smog/o3trend.html illustrate that there have been no Stage 1 Ozone occurrences since 2004. Furthermore. SCAQMD Rule 701 (http://aqmd.gov/rules/reg/reg07/r701.pdf) identifies various "Stage 2" episode criteria that must be complied with if a Stage 2 Alert occurs. Mandatory compliance with SCAQMD Rule 701 achieves the Commenter's recommendation.

E-7.35 - Refer to EIR Mitigation Measure 4.1-3(d), which specifically sets forth Commenter's suggestion as a mitigation measure.

E-7.36 - Refer to EIR Mitigation Measure 4.1-1(d), which will achieve the same result as this recommendation.

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 5 of 13

July 29, 2013
Page 4

32. Electrical powered equipment shall be utilized in-lieu of gasoline-powered engines where technically feasible.*
33. All forklifts shall be electric or natural gas powered.*
34. Suspend use of all construction equipment operations during second stage smog alerts.*
35. Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.*
36. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.*
37. Reroute construction trucks away from congested streets and sensitive receptor areas.*
38. Configure construction parking to minimize traffic interference.*
39. Prior to the issuance of a grading and building permit, the applicant shall submit verification that a ridesharing program for the construction crew has been encouraged and will be supported by the contractor via incentives or other inducements.*
40. Minimize construction worker trips by requiring carpooling and providing for lunch onsite. *
41. Provide shuttle service to food service establishments/commercial areas for the construction crew.*
42. Provide shuttle service to transit stations/multimodal centers for the construction crew.*
43. Require the use of Zero-VOC paints, coatings, and solvents.

(* Would reduce impacts to GHGs as well)

E-7

Operational Emissions

1. The operator of the primary facilities shall become SmartWay Partner.*
2. The Project shall meet SmartWay 1.25 ratings.*
3. The project shall use only freight companies that meet SmartWay 1.25 ratings.*
4. (ALTERNATIVELY from 2,3 above) The operator of the primary facilities shall incorporate requirements or incentives sufficient to achieve at least 20% per year (as a percentage of previous percentage, not total trips) increase in percentage of long haul trips carried by SmartWay carriers until it reaches a minimum of 90% of all long haul trips carried by SmartWay 1.0 or greater carriers. Results, including backup data shall be reported to the Planning Department semi-annually.*
5. The operator of the primary facilities shall incorporate requirements or incentives sufficient to achieve a 15% per year (as a percentage of previous percentage, not total trips) increase in percentage of consolidator trips carried by SmartWay carriers until it reaches a minimum of 85% of all consolidator trips carried by SmartWay 1.0 or greater carriers. Results, including backup data shall be reported to the Planning Department semi-annually.*
6. All fleet vehicles shall conform to 2010 air quality standards or better. Results, including backup data shall be reported to the Planning Department semi-annually.*
7. Any spaces utilizing refrigerated storage, including restaurants and food or beverage stores, shall provide an electrical hookup for refrigeration units on delivery trucks. Trucks incapable of utilizing the electrical hookup for powering refrigeration units shall be prohibited from accessing the site. All leasing documents shall include these requirements and provide that violation of those provisions will constitute a material breach of the lease that will result in the termination of the lease. Because of the fact that these terms of the lease are designed to benefit the public, the public shall be considered

E-8

Responses

E-7.37 - EIR Figure 4.4-13 depicts the City's designated truck route. Mitigation Measure 4.1-3(m) has been added to the Final EIR as follows "Construction vehicles shall use the City's designated truck route."

E-7.38 - Mitigation Measure 4.1-3(n) has been added to the Final EIR as follows "Construction parking shall be located and configured to minimize traffic interference on public streets."

E-7.39 - Refer to Response E-7.19. Mitigation Measure 4.1-3(g) has been added to the Final EIR as follows "The construction contractor shall encourage construction site employees to rideshare by offering incentives or other inducements."

E-7.40 - Refer to Response E-7.39. Mobile food vendors regularly visit construction sites in the City of Moreno Valley. Commenter's recommendation to require that lunch be provided to construction workers by their employer or other person, or to require that construction workers pack a lunch to eat on-site in an effort to keep workers from traveling off-site to eating establishments is not practical, nor would such a requirement be feasible for the City to monitor or enforce.

E-7.41 - Refer to Responses E-7.19 and E-7.40.

E-7.42 - Refer to Response E-7.19. A Riverside Transit Agency (RTA) bus route (Route 19), with designated northbound and southbound stops on Perris Boulevard, is available adjacent to the Project site, rendering it unnecessary to shuttle the construction crew to a transit station.

E-7.43 - Refer to EIR Mitigation Measure 4.1-4, which specifically sets forth Commenter's suggestion as a mitigation measure.

E-8.1 - SmartWay is a U.S. Environmental Protection Agency (EPA) program that individuals and companies in the transportation industry can voluntarily join and which encourages voluntary achievement of fuel

Responses

efficiency practices. Commenter's recommendation to require the future tenant of the proposed building to join a voluntary program in which participation is voluntary would not assure the reduction of mobile source emissions. Regardless, Mitigation Measure 4.1-7 has been expanded to require disclosure about the EPA's SmartWay program.

E-8.2 - Commenter's recommendation is not feasible. The U.S. EPA SmartWay program applies to vehicle fuel efficiency and not project design. There is no way for Project's design to achieve a SmartWay rating.

E-8.3 - Commenter suggests that the City of Moreno Valley prohibit or substantially limit long-haul trucks from accessing the Project site unless they meet U.S. EPA SmartWay ratings. SmartWay is a voluntary program that encourages vehicles to operate at a higher fuel efficiency then state and federal emission laws require. The imposition of a SmartWay fleet requirement on this Project (or any emissions requirement more stringent that state or federal laws require) would reduce mobile source emissions emitted by Project operations compared to the levels disclosed in the EIR, which were calculated based on the SCAQMD's California Emissions Estimator Model™ (CalEEMod™), but would do nothing to improve regional air quality. Such a requirement would merely displace vehicles not achieving SmartWay ratings to another location in the South Coast Air Basin where the requirement is not imposed, thereby resulting in no improvement to regional air quality. Additionally, if the displacement was to another location further from regional transportation routes, the vehicles would travel a longer distance and emit more pollutants. Thus, the Commenter's recommendation would not effectively reduce or avoid the impact to air quality in the South Coast Air Basin. The Commenter provides no evidence that the recommendation to impose a SmartWay long-haul carrier requirement or other mobile fleet requirement on this one project would be effective in improving air quality in the South Coast Air Basin.

Responses

E-8.4 - Refer to Response E-8.3.

E-8.5 - Refer to Response E-8.3.

E-8.6 - Refer to Response E-8.3.

E-8.7 - As stated on EIR page 3-6, "[t]he building is not designed to accommodate tenants that would require warehouse refrigeration." Regardless, Mitigation Measure 4.1-8 has been added to the EIR, as follows "In the event that the building design is modified to accommodate refrigeration, all loading docks shall be equipped with an electrical hookup to power refrigerated tractor trailers." As specified as EIR Project Requirements PR 4.1-7 and PR 4.1-8, the Project is required to comply with California Code of Regulations Title 13, which requires a limitation on truck idling. Further, Mitigation Measure MM 4.1-5 requires the placement of signs on the property instructing drivers to idle for no more than three (3) minutes. Mandatory compliance with Title 13 will achieve the same result as this recommendation. As such, it is not necessary to include a truck prohibition in the lease.

The Commenter's request that all leasing documents include these provisions and that a material breach of the lease shall result in termination of the lease has not been included for the following reasons. First, the "general public" cannot be a third party beneficiary to a private contractual arrangement. Second, if enforcement is a concern, resident taxpayers and those who with a geographical nexus to the project have standing to seek a writ of mandate against the City for any non-compliance with any and all mitigation measures set forth in this EIR, its Mitigation Monitoring and Reporting Program (MMRP) or any other MMRP. Third, Mitigation Measures become conditions of Project approval and are enforceable through Code Enforcement actions that can result in civil and at times criminal liability. Thus, not only is it unlawful and impractical to require some sort of nebulous "third party beneficiary" right in a private lease, but more importantly such a requirement is unnecessary as the public has

Responses

ample opportunities to enforce or to seek enforcement of the Mitigation Measures as set forth above.

E-8.8 - Regarding on-road vehicles powered by gasoline that access the Project site, Commenter's recommendation is not necessary because the same result is achieved by mandatory compliance with state and federal vehicle emission laws. Regarding off-road gasoline powered equipment that might be used by a building tenant or operator on the Project site, there are various exhaust emission technologies available and various state and federal emission regulations that must be complied with to reduce NOx emissions. The City does not have an enforcement mechanism or the staffing resources to monitor and enforce the mechanical composition of every piece of gasoline powered equipment, especially given the cyclical nature of equipment used by building tenants. Additionally, Commenter does not establish any nexus or rough proportionality between this recommendation and the Project's NOx air quality impact, which is primarily caused by on-road mobile sources and not off-road operational equipment.

E-8.9 - Regarding on-road vehicles powered by diesel fuel, refer to Response E-8-3. Regarding off-road diesel powered equipment that might be used by a building tenant or operator on the Project site, EIR Mitigation Measures 4.1-7 requires that the building tenant be notified about the availability of alternatively fueled cargo handling equipment. The City does not have an enforcement mechanism or the staffing resources to monitor and enforce the fuel usage of every piece of gasoline powered equipment, especially given the cyclical nature of equipment used by building tenants. Additionally, Commenter does not establish any nexus or rough proportionality between this recommendation and the Project's NOx air quality impact, which is primarily caused by on-road mobile sources and not off-road operational equipment.

E-8.10 - Refer to Response E-8.7. The City does not have an enforcement mechanism or the staffing resources to monitor and enforce the power

Responses

supply requirement of every piece of equipment used in the Project's operation, especially given the cyclical nature of equipment used by building tenants. Additionally, Commenter does not establish any nexus or rough proportionality between this recommendation and the Project's NOx air quality impact, which is primarily caused by on-road mobile sources and not off-road operational equipment.

E-8.11 - Refer to Response E-8.10.

E-8.12 - Refer to Response E-8.10.

E-8.13 - Refer to Response E-8.10.

E-8.14 - Refer to EIR Project Requirements PR 4.1-7 and PR 4.1-8 and Mitigation Measure 4.1-5, which specifically sets forth Commenter's suggestion as mandatory regulatory requirements and a mitigation measure.

E-8.15 - Refer to Responses E-8.3, E-8.9 and E.8-10.

E-8.16 - Commenter's recommendation is not feasible. Given the nature of the proposed Project, there will be no parking fee.

E-8.17 - In regard to tractor trailers, electric powered heavy duty trucks do not exist in the marketplace so there would be no environmental benefit to providing charging stations for such vehicles. Mitigation Measure 4.1-8 has been added to the EIR that will require loading docks to be equipped with an electric hookup if the trucks and warehoused goods require refrigeration. Regarding passenger cars, this project like all new developments in the State of California are required to comply with the California Building Standard Code (also known as CalGreen, 2013). CalGreen Section 5.106, Site Development, requires that a certain number of parking spaces be designated for any combination of low-emitting, fuel-efficient and carpool/vanpool vehicles. CalGreen does not require the

Responses

installation of electric vehicle (EV) plug-in units, but the Project Applicant may install conduit to these spaces to allow the future installation of EV units by the building tenant.

E-8.18 - Alternative fuel infrastructure is best provided in a planned, regional manner, based on the demand for such fuels. Two alternative fueling stations supplying compressed natural gas (CNG) are open to the public in Moreno Valley. Vehicle operators accessing the proposed Project would have access to this alternative fuel source a short distance away and there would be no measurable environmental benefit to duplicating CNG fuel infrastructure at the Project site.

E-8.19 - Commenter's recommendation is achieved by mandatory compliance with the California Building Standards Code (CalGreen, 2013). CalGreen Section 5.106, Site Development, requires that a certain number of parking spaces be designated for any combination of low-emitting, fuel-efficient and carpool/vanpool vehicles. The designated parking stalls are required to be painted "Clean Air Vehicle" (CalGreen, 2013, Table 5.106.5.2).

E-8.20 - Commenter's recommendation is not feasible. Given the nature of the proposed Project, there is no enforceable mechanism available to the City to require the imposition of punitive parking fee on workers and visitors to the Project site that arrive in a single occupant vehicle. Additionally, Commenter does not provide any information to demonstrate that such a punitive measure would result in an improvement to air quality. The likely result would be a fee payment to park, which would not result in reduced NOx emissions or have any benefit on regional air quality. Additionally, pursuant to Health and Safety Code Section 40717.9, no public agency shall require an employer to implement an employee trip reduction program unless the program is required by federal law. Accordingly, pursuant to Health and Safety Code Section 40717.9, the City is not authorized to effectively mandate that the tenant/owner implement mandatory employee carpooling.

Responses

E-8.21 - A landscaping plan is a requirement of the Project's proposed Building Plot Plan and is shown on EIR Figure 3-7. The City requires that 10% of the property be landscaped, and the Project proposes to exceed that requirement by providing 13.2% landscape cover. The planting of trees in the truck court is not required by the City or proposed by the Project to avoid maneuverability issues for trucks. Commenter does not establish any nexus or rough proportionality between this recommendation and the Project's NOx air quality impact, which is primarily caused by on-road mobile sources and not from parked vehicles in unshaded parking lots.

E-8.22 - A landscaping plan is a requirement of the Project's proposed Building Plot Plan and is shown on EIR Figure 3-7. The City requires that 10% of the property be landscaped, and the Project proposes to exceed that requirement by providing 13.2% landscape cover. Several of the tree species and other plant materials specified qualify as "low ozone forming", based on a University of California Davis study titled "Urban Trees and Ozone Formation: A Consideration of Large-Scale Plantings" published March 2012 and available at http://anrcatalog.ucdavis.edu/pdf/8484.pdf.

E-8.23 - Refer to Responses E-8.21 and E-8.22.

E-8.24 - The Project's one (1) proposed building is oriented north/south as Commenter recommends. Regarding landscaping, refer to Responses E-8.21 and E-8.22. Given the nature of the proposed Project and the regional climate and meteorology as described in EIR Section 4.1.1(B), there would be a de minimus effect associated with passive solar heating and cooling by the planting of trees around the structure. In any case, a landscaping plan is a requirement of the Project's proposed Building Plot Plan and is shown on EIR Figure 3-7. Tress would be planted around three (3) sides of the structure. The east-facing elevation would consist of an interior truck yard where trees and other landscaping are not proposed to avoid interference with vehicle movements.

Responses

E-8.25 - Refer to Response E-8.24. Commenter does not establish any nexus or rough proportionality between this recommendation and the Project's NOx air quality impact, which is primarily caused by on-road mobile sources and not from the surfaces of parking lots. Adding landscape pockets in parking lots is also not water-use efficient and would increase the Project's demand for irrigation water, which is reliant on fossil fuels to produce and convey.

E-8.26 - Commenter does not establish any nexus or rough proportionality between this recommendation and the Project's NOx air quality impact, which is primarily caused by on-road mobile sources and not from the use of landscape maintenance equipment. Beginning on January 1, 2014, the California Building Standards Code (CalGreen) Title 24, Section 5.409, Building Maintenance and Operation, will require new non-residential buildings over 10,000 s.f. to comply with commissioning and reporting requirements and conduct functional performance testing for energy efficiency. Mandatory compliance with CalGreen achieves Commenter's recommendation to reduce energy use associated with building maintenance activities.

E-8.27 - The proposed Project is not a residential, commercial, or mixed-use development; thus, Commenter's recommendation does not apply. Furthermore, Commenter does not establish any nexus or rough proportionality between this recommendation and the Project's NOx air quality impact, which is primarily caused by on-road mobile sources and not from landscape maintenance equipment.

E-8.28 - The proposed Project is not a residential development; thus, Commenter's recommendation does not apply.

E-8.29 - Commenter's recommendation is not feasible. There is no enforceable mechanism available to the City to require that private building tenants pay their employees to abstain from arriving to work by motorized vehicle, or to use transit, carpools, or vanpools.

Responses

E-8.30 - Commenter's recommendation is not feasible. There is no enforceable mechanism available to the City to require private building tenants to institute a carpooling or vanpooling program.

E-8.31 - The proposed Project is not a residential development; thus, Commenter's recommendation does not apply.

E-8.32 - The proposed Project is not a residential development; thus, Commenter's recommendation does not apply.

E-8.33 - Refer to Response E-8.19.

E-8.34 - Refer to Responses E-8.19 and E-8.29.

E-8.35 - As specified in EIR Section 3.3.2, bicycle parking is required to be provided on the property in compliance with the City of Moreno Valley Municipal Code Section 9.11. Bicycle parking also is required pursuant to the California Building Standards Code (CalGreen, 2013, Sections 5.106.4.1 and .2).

E-8.36 - As specified in EIR Section 3.3.5(A), the Project proposes to install a transit stop along its frontage with Perris Boulevard. A sidewalk also is proposed along the Project's frontage with Perris Boulevard, which will provide a pedestrian connection to the transit stop.

E-8.37 - In August 2013, the City commissioned the preparation of a city-wide bicycle master plan. Commenter's recommendation will be addressed on a city-wide basis by the master plan and is not applicable to the proposed Project, which would not affect a bicycle route.

E-8.38 - Interior tenant improvements are not under consideration by the City at this time as part of the Project's proposed Building Plot Plan. Commenter's recommendation is not included because Commenter

Responses

supplies no evidence, and the City has uncovered no evidence in professional literature, to indicate that the provision of on-site showers in an industrial warehouse in a contextual setting similar to the proposed Project's would incentivize employees to bike or walk to work and reduce air emissions associated with worker commuting by motorized vehicle.

E-8.39 - Refer to Response E-8.35. The proposed Project is not a retail development; thus, Commenter's recommendation does not apply.

E-8.40 - Refer to Response E-8.37.

E-8.41 - Refer to Response E-8.36.

E-8.42 - Refer to Response E-8.36.

E-8.43 - Commenter's recommendation is not feasible. There is no enforceable mechanism available to the City to require private building tenants to post information about transportation options. Further, state and federal law directs that public agencies are prohibited from imposing employee trip reduction programs unless such a program is expressly required by federal law (Health & Safety Code Section 40717.9 and Section 40454).

E-8.44 - Mobile food vendors regularly visit employment sites in the City of Moreno Valley. Commenter's recommendation to require that private building tenants shuttle their employees to lunch, or require that their employees pack a lunch to eat on-site in an effort to keep workers from traveling off-site to eating establishments is not practical, nor would such a requirement be feasible for the City to monitor or enforce.

E-8.45 - Commenter's recommendation is not incorporated because as specified in EIR Section 3.3.5(A), the Project proposes to install a transit stop along its frontage with Perris Boulevard. Because a transit stop would be available adjacent to the property, there would be no benefit in

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 6 of 13

July 29, 2013
Page 5

to be a third party beneficiary with standing to enforce the requirements of the lease.*

8. Install catalytic converters on gasoline-powered equipment.*
9. Where diesel powered vehicles are necessary, require the use of alternative diesel fuels. Alternative diesel fuels exist that achieve PM10 and NOx reductions. PuriNOx is an alternative diesel formulation that was verified by CARB on January 31, 2001 as achieving a 14% reduction in NOx and a 63% reduction in PM10 compared to CARB diesel. It can be used in any direct-injection, heavy-duty compression ignition engine and is compatible with existing engines and existing storage, distribution, and vehicle fueling facilities. Operational experience indicates little or no difference in performance and startup time, no discernable operational differences, no increased engine noise, and significantly reduced visible smoke.
10. Electrical powered equipment should be utilized in-lieu of gasoline-powered engines where technically feasible.*
11. Utilize electrical equipment for landscape maintenance.*
12. All forklifts shall be electric or natural gas powered.*
13. Utilize electric yard trucks.*
14. Prohibit idling of trucks for periods exceeding three minutes.*
15. Provide electrical vehicle ("EV") and compressed natural gas ("CNG") vehicles in vehicle fleets.*
16. Charge reduced or no parking fee for EVs and CNG vehicles.*
17. Install EV charging facilities for a minimum of 10% of all parking spaces.*
18. Install a CNG fueling facility.*
19. Provide preferential parking locations for EVs and CNG vehicles.*
20. Implement parking fee for single-occupancy vehicle commuters.*
21. The Draft EIR notes that landscaping shall be "ornamental" in nature. Mitigation should be adopted to including planting shade trees in parking lots to provide minimum 50% cover to reduce evaporative emissions from parked vehicles.*
22. Plant at least 50 percent low-ozone forming potential (Low-OFP) trees and shrubs, preferably native, drought-resistant species, to meet city/county landscaping requirements.*
23. Plant Low-OFP, native, drought-resistant, tree and shrub species, 20% in excess of that already required by city or county ordinance. Consider roadside, sidewalk, and driveway shading.*
24. Orient 75 percent or more of homes and buildings to face either north or south (within 30 degrees of N/S) and plant trees and shrubs that shed their leaves in winter nearer to these structures to maximize shade to the building during the summer and allow sunlight to strike the building during the winter months.*
25. Provide grass paving, tree shading, or reflective surface for unshaded parking lot areas, driveways, or fire lanes that reduce standard black asphalt paving by 10% or more.*
26. Electrical outlets shall be installed on the exterior walls of all residential and commercial buildings (and perhaps parking lots) to promote the use of electric landscape maintenance equipment.*
27. Prohibit gas powered landscape maintenance equipment within residential, commercial, and mixed-use developments. Require landscape maintenance companies to use battery powered or electric equipment or contract only with commercial landscapers who operate with equipment that complies with the most recent California Air Resources Board

E-8

Responses

requiring the private building tenant to shuttle its employees to a transit stop.

E-8.46 - Interior tenant improvements are not under consideration by the City at this time as part of the Project's proposed Building Plot Plan. Commenter's recommendation is not included because Commenter supplies no evidence, and the City has uncovered no evidence in professional literature, to indicate that the provision of on-site child care in an industrial warehouse in a contextual setting similar to the proposed Project's would reduce air emissions associated with worker commuting by motorized vehicle.

E-8.47 - Commenter's recommendation is not incorporated because there is no enforceable mechanism available to the City to require that private employers implement alternative work week schedules for their employees. Additionally, most distribution warehouses operate 7 days per week, up to 24 hours per days and need to be staffed at all times. Further, Commenter provides no evidence that alternative work week schedules in a 7 day per week, up to 24 hour per day operation would reduce NOx emissions associated with worker commuting.

E-8.48 - Refer to Response E-8.47.

E-8.49 - Leadership in Energy & Environmental Design (LEED) is a national program of the United States Green Building Council (USGBC), wherein the USGBC can supply a third-party verification of "green" buildings at various levels based on their own rating system. In January 2011, California adopted the first statewide mandatory green building code in the country, known as CALGreen. The California Code of Regulations (CCR), Title 24, also known as the California Building Standards Code, or CALGreen Code, sets forth building standards for all construction in the State of California. Title 24 is updated approximately every three (3) years, with the most recent update going into effect on January 1, 2014. The 2014 update will even more stringent building standards to conserve

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 7 of 13

July 29, 2013
Page 6

certification standards, or standards adopted no more than three years prior to date of use or any combination of these two themes.*
28. Provide a complimentary cordless electric lawnmower to each residential buyer.
29. Implement parking cash-out program for non-driving employees.*
30. Require each user to establish a carpool/vanpool program.*
31. Create a car sharing program within the planned community.*
32. Create a light vehicle network, such as a neighborhood electric vehicle (NEV) system.*
33. Provide preferential parking for carpool/vanpool vehicles.*
34. Provide subsidies or incentives to employees who use public transit or carpooling, including preferential parking.*
35. Provide secure, weather-protected bicycle parking for employees.*
36. Provide direct, safe, attractive pedestrian access from project to transit stops and adjacent development.*
37. Provide direct safe, direct bicycle access to adjacent bicycle routes.*
38. Provide showers and lockers for employees bicycling or walking to work.*
39. Short-term bicycle parking for retail customers and other non-commute trips.*
40. Connect bicycle lanes/paths to city-wide network.*
41. Design and locate buildings to facilitate transit access, e.g., locate building entrances near transit stops, eliminate building setbacks, etc.*
42. Construct transit facilities such as bus turnouts/bus bulbs, benches, shelters, etc.* E-8
43. Provide a display case or kiosk displaying transportation information in a prominent area accessible to employees or residents.
44. Provide shuttle service to food service establishments/commercial areas.*
45. Provide shuttle service to transit stations/multimodal centers.*
46. Provide on-site child care or contribute to off-site child care within walking distance.*
47. Implement a compressed workweek schedule.*
48. Implement home-based telecommunicating program, alternate work schedules, and satellite work centers.*
49. All buildings shall be constructed to LEED Platinum standards.*
50. Design buildings for passive heating and cooling and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.*
51. Construct photovoltaic solar or alternative renewable energy sources sufficient to provide 100% of all electrical usage for the entire Project.*
52. Install an ozone destruction catalyst on all air conditioning systems.*
53. Construct renewable energy sources sufficient to offset the equivalent of 100% of all greenhouse gas emissions from mobile sources (internal combustion engines) for the entire Project. *
54. Purchase only green/ renewable power from the electric company.*
55. Install solar water heating systems to generate all hot water requirements.*

The blanket claim by the Draft EIR that the City "does not have the resources to impose and enforce restrictions on engine use and vehicle emissions above and beyond the requirements of state and federal law" is not supported by substantial evidence. Zero emissions technologies relative to mobile emissions are feasible, and must, consistent with CEQA, be adopted for this project. In addition, for instance, electric yard trucks at the project site would reduce emissions. E-9

Responses

energy in every community across the State. All buildings constructed in California inherently incorporate some of the features that qualify for LEED points in the USGBC's rating system.

Commenter's recommendation is not implemented because mandatory compliance with CALGreen will achieve a similar result as Commenter's recommendation to construct the building to LEED Platinum standards. Furthermore, CALGreen requirements and feature that quality for LEED points are intended to reduce energy use in building operation. As concluded by the EIR, the proposed Project's NOx impact is primarily associated with emissions from mobile vehicles and not from other building operations such as use of electricity or other fossil-fuel reliant activities. As such, Commenter does not establish any nexus or rough proportionality between this recommendation and the Project's NOx air quality impact.

E-8.50 - Refer to Response E-8.49.

E-8.51 - Refer to Response E-8.49.

E-8.52 - Refer to Response E-8.49.

E-8.53 - Refer to Response E-8.49.

E-8.54 - Refer to Response E-8.49.

E-8.55 - Refer to Response E-8.49.

E-9 - Refer to Responses E-7.1 through E-8.55.

The Commentator requests that the MMRP contain restrictions on emissions and vehicle use and access at the site. The SCAQMD regulates a unified Air Basin. One of the statutory charges of SCAQMD is to ensure uniform CEQA review by lead agencies located within the Air Basin. Uniform CEQA review allows SCAQMD to track progress toward State

Responses

and federal CAA attainment status. As a result of SCAQMD's uniform CEQA review throughout the South Coast Air Basin (SCAB), and through the use of SCAQMD's CEQA thresholds of significance, which are based on science, and the adoption of numerous regulatory programs regulating non-mobile source emissions, air quality in the SCAB has dramatically improved over the past 30 years. The California Air Resources Board (ARB) most recent *Almanac of Emissions and Air Quality* (2009, Chapter 3) indicates that NOx and ROG emissions trends and forecasts are trending downward, showing an overall improvement in air quality. Continued improvement in air quality is expected to occur through the continued implementation of SCAQMD regulations and uniform CEQA review and through the enforcement of the State's low carbon fuel (Pavley) and low sulfur diesel fuel programs.

SCAQMD's Fiscal Year 2012-2103 Budget & Work Program (herein incorporated by reference and available for review at http://www.aqmd.gov/finn/PDF/finalbudget1213.pdf), page 2, states that although the SCAB has suffered unhealthful air since World War II and is one of the most unhealthful air basins in the United States, the 65-year history of the region's air pollution control efforts is, in many ways, one of the world's key success stories. Peak ozone levels have been cut by almost three-fourths since air monitoring began in the 1950 and population exposure was cut in half during the 1980s alone. (SCAQMD, 2013, page 2) Thus, overall air quality within the Air Basin is dramatically improving as the result of regulatory programs and is expected to continue to improve in the future as regulations become more stringent. As stated in AQMD's Fiscal Year 2012-2013 Budget and Work Program:

"Ozone levels have fallen by about three-quarters since peaks in the mid-1950s. Lead, nitrogen dioxide, sulfur dioxide, and carbon monoxide levels have gone down from non-attainment to full attainment of federal health standards. In November 2008, US EPA revised the lead standard from a 1.5 µg/m3 quarterly average to a 0.15 µg/m3 rolling 3-month average. The current Basin lead network remains below the new standard…. In 2011,

Responses

the Basin exceeded the current federal 8-hour ozone standard on 107 days. 2010 was the cleanest year on record for ozone in the Basin, exceeding the federal standard on 102 days. The standard was exceeded on 113 days in 2009.

In 2007 US EPA formally redesignated the Basin from non-attainment to full attainment of the federal health standard for carbon monoxide. Basin-wide maximum levels of carbon monoxide have been consistently measured at more than 30% below the federal standard since 2004. In 2010, US EPA established a new NO2 1-hour standard at a level of 100 ppb (0.100ppm) and SO2 1-hour standard at a level of 75 ppb (0.075 ppm). In 2011, a few sites in Los Angeles County exceeded the new 1-hour NO2 standard on one day. Based on the 3-year design values, the region continues to remain in attainment of the NO2 and SO2 standards.

In 2006, US EPA rescinded the annual federal standard for PM10 but retained the 24-hour standard. Ambient levels of PM10 in the Basin meet the federal 24-hour PM10 standard and the AQMD has requested US EPA to redesignate the Basin as in attainment of the health based standard for PM10. PM2.5 levels have decreased dramatically in the Basin since the beginning of the decade; however, regional concentrations continue to exceed the federal annual and 24-hour standards." (SCAQMD, 2013, pages 3-4).

Imposing fleet controls on the Project would not be feasible given the realities of the southern California economy and the nature of local control. High cube logistics and warehousing is one of the largest sectors of the California economy and is subject to fierce competition. A city's decision to unilaterally impose fleet controls on projects within its boundaries would have no real environmental benefit. Companies seeking to rent or buy such warehousing space have a tremendous range of options throughout Southern California (particularly in the Inland Empire) and if a City were to unilaterally impose fleet restrictions on warehouse buildings within its borders, its share of the developable market for warehouse

Responses

uses would evaporate as users and tenants would simply relocate to other cities within the SCAQMD Air Basin (such as Ontario, Perris, Riverside, Corona, Beaumont, etc.). Thus the NOx, ROG and DPM emissions would simply be shifted to another portion of the Air Basin and the Air Basin's overall air quality would not be benefited. Additionally, the overall air quality in the Air Basin could arguably be worsened if the alternative locations resulted in increased vehicle miles traveled and hence more emissions. The same rational holds true for electric yard trucks. Electric yard trucks would still be powered from the electrical grid and thus the emissions would simply be transferred to some other portion of the Air Basin where the electrical generation occurs. Moreover, the Project HRA demonstrated that there are no sensitive receptors that will be significantly impacted by Project operations.

The Commentator requests that the MMRP contain restrictions on emissions and vehicle use and access at the site. The SCAQMD regulates a unified Air Basin. One of the statutory charges of SCAQMD is to ensure uniform CEQA review by lead agencies located within the Air Basin. Uniform CEQA review allows SCAQMD to track progress toward State and federal CAA attainment status. As a result of SCAQMD's uniform CEQA review throughout the South Coast Air Basin (SCAB), and through the use of SCAQMD's CEQA thresholds of significance, which are based on science, and the adoption of numerous regulatory programs regulating non-mobile source emissions, air quality in the SCAB has dramatically improved over the past 30 years. The California Air Resources Board (ARB) most recent *Almanac of Emissions and Air Quality* (2009, Chapter 3) indicates that NOx and ROG emissions trends and forecasts are trending downward, showing an overall improvement in air quality. Continued improvement in air quality is expected to occur through the continued implementation of SCAQMD regulations and uniform CEQA review and through the enforcement of the State's low carbon fuel (Pavley) and low sulfur diesel fuel programs.

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 8 of 13

July 29, 2013
Page 7

It is not clear why such mitigation measures cannot feasibly be adopted particularly where there no tenant identified for the project. E-9

In addition, the air quality analysis does not clearly disclose the number of truck trips associated with soil export and import. Without such information, it is difficult for the reader to discern whether the air quality analysis is accurate. For instance, for the grading phase, the air quality study appears to assume zero emissions for hauling. *See*, Draft EIR, Appendix D, Appendix A, p. 10. The same is true for "site preparation." As the project will require a substantial amount of export and import of fill, all truck trips must be accounted for in the analysis. E-10

Furthermore, the Draft EIR appears to be inconsistent where, for instance, at page S-9 it states that construction air quality impacts are significant and unavoidable for VOC and NO_x, but in the analysis section (p. 4.1-29) states that impacts are less-than-significant with mitigation imposed. E-11

Overall, the air quality analysis is flawed and the conclusions of the Draft EIR are not based on substantial evidence. E-12

Cumulative Air Quality Impacts

The air quality analysis does not capture the extent of the cumulative projects for either construction or operational phases. One must look to the traffic study to find a list of cumulative projects but even there the air emissions associated with said projects are not disclosed and the number of projects appears to be understated.

The finding of less than significant short-term cumulative impacts is unsupported by evidence in the record. The Draft EIR concludes that because individual air quality impacts will be less than significant that cumulative air quality impacts are also insignificant. This entirely misses the purpose of a cumulative impact evaluation. Given the construction plan of this Project and construction timing of other nearby projects including, for instance, VIP Moreno Valley, Prologis Eucalyptus, World Logistics, March Lifecare Campus, etc., it is entirely plausible that the Project may result in cumulatively significant construction air quality impacts. The EIR must evaluate these potentially significant effects rather than just conclude, based on no evidence, that such effects will be insignificant. Also, construction air quality is evaluated assuming that construction will occur in phases. When and if phases are combined, impacts are greater. Construction phasing must be made a requirement of the project where the analysis is dependent on such phasing. E-13 E-14

Also for example, operational impacts are near significant thresholds for VOC emissions. Combined with the other numerous industrial projects in the area, it is reasonable to conclude that cumulative impacts are also significant. E-15

Greenhouse Gas Emissions

The conclusion that Greenhouse Gas Emissions are "not significant" and "therefore, mitigation measures are not required" is simply not supported by the record where the project will create 10.632.09 MT/y CO_2E. This is a new source of GHG emissions requiring mitigation. E-16

Responses

E-10 - As specified in EIR Section 3.3.5(D), import of between 28,000 and 30,000 cubic yards of earth material is anticipated to implement the proposed Project. Haul trucks carry up to approximately 30 cubic yards per trip (depending on weight to meet Caltrans weight restriction requirements). Thus, approximately 1,000 inbound and outbound construction-related haul trips would be required over the course of approximately 15 days, or approximately 66 trips per day. Although import of earth materials was not specifically studies in the technical air quality analysis, there would be no greater air quality impact associated with hauling than as disclosed in the EIR for the grading and construction operations themselves. To ensure that the levels of construction-related air emissions disclosed in the EIR are not exceeded, Mitigation Measure 4.1-3(o) has been added to the Final EIR as follows "Import of earth materials and on-site grading activities shall not occur on the same day. No more than 66 loads of earth material (about 2,000 cubic yards) shall be brought to the site in any given day."

E-11 - The conclusion drawn in EIR Section 4.1 is accurate. Construction-related NOx and VOC impacts will be less than significant after the incorporation of mitigation measures. The Executive Summary has been corrected accordingly in the Final EIR.

E-12 - Refer to Responses E-5 through E-12, which indicate that the air quality analysis is not flawed and is based on substantial evidence.

E-13 - The significance threshold for cumulative air quality impacts relies on regional and localized significance thresholds published by the South Coast Air Quality Management District (SCAQMD), as indicated in EIR Table 4.1-4. The SCAQMD's CEQA Air Quality Significance Thresholds indicate that any projects in the South Coast Air Basin (SCAB) with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. Thus, the significance threshold for direct and cumulative impacts is the same, pursuant to SCAQMD protocols and methodologies.

Responses

The extent of cumulative projects and their quantified air emissions is thus irrelevant to the conclusion of whether or not the proposed Project would have a significant impact, and at what level of severity. Also refer to the SCAQMD "White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution" (March 2003), herein incorporated by reference, and available for review at http://www.aqmd.gov/rules/ciwg/final_white_paper.pdf, which addresses the AQMD's comprehensive strategy for addressing accumulated effects of emission sources. In this report the AQMD clearly states (Page D-3):

> *"…the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR….Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The Commenter provides no information about what it believes to appropriately constitute a cumulative impact or cumulatively considerable project impact, if not SCAQMD guidance, which is relied upon by nearly every CEQA lead agency in the South Coast Air Basin. For all of these reasons, detailed quantified dispersion modeling for a list of cumulative projects is not required and would not result in a different impact conclusion for the Project.

Another factor to consider when determining the lack of warrants for a quantified cumulative emissions calculation is the overall impact trend. Air quality is rapidly improving across California due to regulations adopted at the federal, state, and air district levels. As noted in the EIR, the Project's largest source of air emissions would be associated with diesel-fueled vehicles. The California Air Resources Board (ARB) Diesel Risk Reduction Plan (DRRP) (California Air Resources Board,

Responses

2000. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Stationary Source Division. Mobile Source Control Division.* October 2000) led to the adoption of new state regulatory standards for all new on-road, off-road, and stationary diesel-fueled engines and vehicles to reduce diesel particulate matter (DPM) emissions by about 90 percent overall from year 2000 levels as stated on page 1 of the DRRP. The projected emission benefits associated with the full implementation of this plan (p. 2), including federal measures, are reductions in DPM emissions and associated cancer risks of 75 percent by 2010 and 85 percent by 2020 (ARB 2000). Additionally, and according to the most recent ARB Almanac (2009) and SCAQMD 2012-2013 Budget & Work Program, sources of toxic air contaminates have achieved a downward trajectory over recent decades. Also refer to Response E-13. Therefore, overall improvement in air quality is anticipated to continue to accrue for the foreseeable future as current and more stringent state and federal regulations are implemented, resulting in an improvement in air quality when considered in a cumulative context.

E-14 - Mitigation Measure 4.1-3(e) has been added to the Final EIR, as follows: "During construction activity, the operating time of all pieces of off-road diesel-powered equipment shall not exceed a combined total of 75 operating hours per day." Additionally, refer to Mitigation Measure 4.1-3(a), which requires that mass grading be limited to no more than 4.0 acres per day. These measures will ensure that daily construction activity is limited to no more than assumed and analyzed in the EIR.

E-15 - Refer to Response E-13.

E-16 - As explained in the EIR, California Assembly Bill (AB) 32, the California Climate Solutions Act of 2006, requires that statewide greenhouse gas (GHG) emissions be reduced to 1990 levels by the year 2020. Because AB 32 is the primary plan, policy or regulation adopted in the State of California to reduce GHG emissions, the City appropriately applied compliance with AB32 as the EIR's significance threshold. A

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 9 of 13

July 29, 2013
Page 8

The EIR adopts an improper threshold of significance for GHG emissions, namely whether the project will be consistent with the CARB Scoping Plan. The Draft EIR fails to evaluate such impacts with respect to SCAQMD's significance threshold tiered approach adopted December 5, 2008. Pursuant to this interim approach, if an industrial project exceeds the screening value, it is potentially significant and should be mitigated or the use of offsets employed. The screening value for an industrial project is 10,000MT/yr CO2e. By failing to provide an appropriate evaluation of the Project's GHG impact based on the most recent SCAQMD approach, the EIR fails as an informational document. E-16

In addition, because project GHG impacts are significant per the above threshold, all feasible mitigation measures must be adopted. This is particularly true given, as the Draft EIR acknowledges, the role of local government in achieving GHG reductions. The project appears to take credit for regulatory requirements imposed by the State of California and the SCAQMD. These are already mandatory requirements of the project. Where impacts are significant, feasible mitigation measures must be adopted. The above recommended mitigation with an asterisk must be incorporated for the Project's significant GHG effects. E-17

Mobile source emissions are the greatest component of the Project's GHG emissions. (DEIR Appendix G, p. 42). The Draft EIR discounts SCAQMD's comments on trip generation (*see* Appendix G, p. 37), thus, mobile emissions are likely understated. Even so, GHG mitigation relative to mobile sources is required where impacts are significant. For example, as the DEIR acknowledges, Action T-7 requires existing trucks/trailers to be retrofitted with the best available technology and/or CARB-approved technology. The DEIR claims this action measure is not applicable to the project. On the contrary, the project can be conditioned to require the use of cleaner technology on truck fleets. There is no showing why zero emission and/or other cleaner technologies cannot be employed for the project. Requiring the use of cleaner technologies obviously cuts down on project emissions. E-18 E-19

Additionally, the Draft EIR does not find that the Project's GHG emissions will result in a cumulative impact. The evaluation of cumulative effects in the EIR is fatally defective as it omits many important projects including, for example, the World Logistics project or Prologis Eucalyptus project. E-20

Traffic Impacts

The Draft EIR finds that the project will contribute on a cumulatively significant basis to impacts to seven roadway segments and five intersections. E-21

The Draft EIR states that the project will make funding contributions for "Opening Year 2017" impacts to DIF and TUMF programs for improvements to various segments and intersections. It is stated that "[w]ith required payment of [] DIF fees and TUMF fees … and implementation of the DIF and TUMF-funded improvements at the cumulatively impacted facilities, all cumulatively impacted roadway segments and intersections in Opening Year Cumulative (2017) Conditions would be reduced to a less than significant impact with the exception of two (2) E-22

Responses

numerical threshold for determining the significance of greenhouse gas emissions in the South Coast Air Basin has not been established by the SCAQMD for projects where it is not the lead agency. Further, the screening threshold of 10,000 MT/year CO2e used by the SCAQMD for its own lead agency industrial projects applies to stationary sources of air pollution, such as smokestacks, whereas the proposed Project's primary source of air emissions is not a stationary source, but rather mobile source emissions associated with vehicles traveling to and from the property. The EIR quantifies and discloses the Project's annual greenhouse gas emissions even though a numerical significance threshold was not applied; as such, the EIR clearly does not fail as an informational document.

E-17 - As concluded in the EIR, the proposed Project would result in a less than significant GHG emissions impact because the Project complies with AB32. Refer to Response E-16 for more information regarding the use of AB32 as a credible basis for determining significance. Mitigation measures are not required for impacts that are less than significant. Nonetheless, the EIR sets forth Mitigation Measure MM 4.2-1 and 4.2-2 to reduce reliance on fossil fuel usage. Additionally, refer to Responses E-7.1 through E-7.55.

E-18 - The City respectfully disagrees with Commenter's and SCAQMD assertion that the EIR underestimates the Project's trip generation. The EIR assumes a maximum of 576 vehicle trips per day, including 265 passenger cars and 311 trucks. With only 54 loading bays proposed, this would mean that every bay would need to turn over at least 5 or 6 times a day to accommodate 311 trucks, which is highly unlikely (Cochran, 2013). The trip rates used in the EIR analysis are rates recommended by the Institute of Traffic Engineers (ITE), which are based on national scientific study. Additionally, the Commercial Real Estate Development Association (formerly known by the acronym NAIOP), commissioned a study of high-cube warehouses over 500,000 s.f. in size in the Inland Empire in 2011 using data collected in 2008. The NAIOP study covered 31 warehouse sites and was overseen by a Technical Advisory Group

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 10 of 13

July 29, 2013
Page 9

intersections: Western Way/Harley Knox Boulevard … and Indian Street/Harley Knox…" (DEIR p. 4.4-24, emphasis added) The EIR thus assumes the implementation of all traffic improvements except those as to the two aforementioned intersections. However, impacts to all intersections and segments are significant and unmitigated where there is no evidence that any of the necessary improvements are scheduled for implementation or funded under the programs. Mitigation is thus uncertain and unenforceable in contravention of CEQA's mandates. The Draft EIR simply notes that certain intersections are "covered" under the DIF-funding or TUMF-funding programs but does not state when these intersection improvements are scheduled to occur or how much funding has already been collected. As such, there is not substantial evidence to show that the improvements are likely to occur in time for the project or in the foreseeable future. The conclusion that cumulative conditions would be reduced to less than significant is not supported by the Draft EIR. (*See, e.g., 2011 Annual Report, Transportation Uniform Mitigation Fee Program,* Western Riverside Council of Governments, "Five Year Transportation Improvement Program," <http://www.wrcog.cog.ca.us/downloads/AnnualReport_for_web.pdf>, p.39, *See, also,* <http://www.wrcog.cog.ca.us/downloads/2012CentralZoneTIP020612.pdf> [detailing funded expenditures in the Central Zone]) Furthermore, TUMF improvements can take up to 9 years to become a reality from a local jurisdiction developing a project to completion of construction. (*2011 Annual Report, Transportation Uniform Mitigation Fee Program, supra,* p.7) Project prioritization, programming, and allocation of funds may also be a barrier to improvements on the roadways impacted by this project. (*2011 Annual Report, Transportation Uniform Mitigation Fee Program, supra,* p.10) The EIR's conclusion that project transportation impacts on local roadways and intersections are less than significant after mitigation is simply not supported by evidence and the realities of these fair share programs. E-22

Furthermore, MM 4.4-1 is unenforceable and uncertain where there is no evidence to show that the City of Perris has or will establish a fair-share funding program for improvements to the Western Way/Harley Knox and Indian Street/Harley Knox intersections, or that there will be sufficient funding under any program or a schedule in place for the improvements under any program. The Draft EIR concludes that impacts to these intersections are "significant and unavoidable" because the improvements are outside the jurisdiction of the City. However, it is simply unacceptable to allow these intersections to operate at unacceptable levels in the long-term without any assurance of mitigation. The City is charged with the duty under CEQA to adopt all feasible mitigation measures. The Draft EIR fails to disclose why the City as the lead agency for the project could not take further, more enforceable steps to ensure the mitigation of significant project impacts. E-23

In addition, all measures necessary to reduce significant project impacts including those for traffic must be adopted as mitigation measures. Many measures are identified as "project requirements (PR)." The City must adopt all measures necessary to reduce significant project impacts as mitigation measures to ensure their enforceability pursuant to CEQA. E-24

As to trip length and frequency, it is noted in the Draft EIR that the SCAQMD predicts a greater frequency of truck trips for similarly situated industrial/warehouse projects. As the agency with E-25

Responses

with representatives of the City of Moreno Valley, WRCOG, RCTC, San Bernardino County Associated Governments (SANBAG) and UC Riverside. That study revealed that no single trip generation rate is uniformly applicable to all warehouse projects, but that on average, trips generated by large warehouses in the Inland Empire are 0.9904 trips per thousand square feet (TSF), which is less than the rate recommended by the ITE and used in the Project's traffic report. Additionally, as stated in EIR Section 4.1, Air Quality, and Section 4.2, Greenhouse Gas Emissions, air emissions calculated for the Project and disclosed in the EIR are likely overstated because no credit for, or reduction in, emissions was assumed based on diversion of existing trips. A one-way trip length of 17 miles was assumed for passenger cars and a one-way trip length of 61 miles was used for trucks, which is longer than recommended by AQMD in its CalEEMod model calculations.

E-19 - The EIR correctly concludes that GHG emissions are less than significant. Mitigation measures are not required for impacts that are less than significant. Also refer to Response E-8.3, E-13 and E-16.

E-20 - Refer to Response E-13.

E-21 - This statement is accurate.

E-22 - The Western Riverside Council of Government's (WRCOG's) TUMF program was established to provide funding for infrastructure improvements warranted by development projects in the region that contribute vehicular traffic to the circulation network. As stated in the TUMF Nexus Study (2012, page 10), "the idea behind a uniform mitigation fee is to have new development throughout the region contribute equally to paying the cost of improving the transportation facilities that serve longer distance trips between communities. Thus, the fee should be used to improve transportation facilities that serve trips between communities within the region (primarily arterial roadways) as well as the infrastructure for public transportation." Using the 2013/14

Responses

fee schedules, the proposed Project would be obligated to pay $429,094 in TUMF fees. An annual inflation adjustment is considered by WRCOG each year in January. Similarly, the City of Moreno Valley's DIF program collects and applies funding for local roadway improvements, to which the proposed Project is required to contribute $398,333 using 2013 fee rates. In total, the Project's TUMF and DIF fee obligations using current rates would be $827,427.

CEQA allows for the assessment of a fee as an appropriate form of mitigation when it is linked to a specific mitigation program. In this case, the TUMF and DIF are established mitigation programs and WRCOG and the City of Moreno Valley have successful track records of implementing transportation improvements as warranted. The EIR and EIR Appendix F acknowledge that the Project would contribute to cumulatively significant traffic impacts that would not be directly caused by the Project's traffic alone. As such, it is inappropriate to tie the improvement timing for those to the proposed Project. As noted in Table 4-3 of EIR Appendix F, the Opening Year Cumulative (2017) analysis considers the implementation of 52 other cumulative development projects in the vicinity of the Project site. Each of these cumulative developments would also be required to contribute TUMF fees to address improvements needed to regional facilities. Other projects in the City of Moreno Valley would also be required to pay DIF fees. The timing of improvement needs will be determined in part by the pace at which cumulative development projects are implemented and TUMF and DIF funds are collected. WRCOG and the City of Moreno Valley conducts on-going monitoring of the circulation system and plans for the expenditure of TUMF and DIF funds as deficiencies in the regional and local transportation network are identified or anticipated. The payment of these fees as mitigation has a nexus and rough proportionality to the Project's impacts. CEQA does not require that single projects bear the expense of fully mitigating a significant cumulative impact.

E-23 - The EIR acknowledges that Mitigation Measure 4.4-1 might not be

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 11 of 13

July 29, 2013
Page 10

expertise in the area of air emissions in Southern California, the guidance of the AQMD must be followed for project analyses. Truck trips are understated. E-25

The Draft EIR and supporting traffic study both state that 53 cumulative projects were included in the opening year 2017 cumulative conditions analysis. It is not clear that this list is comprehensive list with respect to the number of industrial/warehouse projects approved or proposed for approval in the City at this time. Also it is not appropriate to reduce traffic projections as to these cumulative projects as stated in the Draft EIR. E-26

Overall, the conclusions of the Draft EIR with respect to analysis of traffic impacts are not supported by substantial evidence. E-27

Biological Impacts

The 2012 biological study concludes that the California horned lark, a California Species of Special Concern, was observed on site. The Draft EIR states that impacts to said species are covered by payment of the MSHCP fee but this is not reflected in the biological study (*see*, DEIR Appendix G p. 21). The EIR must show that the payment of the MSHCP fee is adequate mitigation for the loss of this species. E-28

Impacts to the Special Status Plant Species, the smooth tarplant, also may be significant. The Draft EIR claims that impacts are less than significant because the "persistence" of the species is not furthered by the existence of two plants on site. However, mitigation is required where the project results in the loss of this protected plant species. E-29

Noise

The Project site is located in close proximity to large residential developments to the north. Existing residences are also located to the north and south. The closest residence is located within 165 feet of the project site. *See*, DEIR p. 4.3-28. All six phases of construction are expected to generate noise in excess of the City's noise standard, 65 dBA Leq. If construction phases overlap, noise conditions are even worse. For instance, at 200 feet during project grading, noise levels of 87.8 dBA Leq will be experienced. During the 6-month building construction phase, noise levels of 83.3 dBA Leq will be experienced. The Draft EIR concludes that construction noise impacts are significant and unavoidable. Prior to making this conclusion, however, the lead agency is obligated to adopt all feasible mitigation. Feasible construction noise mitigation includes, but is not limited to, E-30

1. Prohibiting construction activities during weekends.
2. Temporary noise barriers must be installed during project construction around the entire construction area.
3. Where technically feasible, utilize only electrical construction equipment
4. Create a noise management plan allowing for input by residents. E-31

In addition, the assumptions of the noise analysis relative to equipment usage must be made requirements of the project; for instance, the noise analysis assumes the use of only one grader E-32

Responses

effective; thus, the EIR correctly concludes that the Project's significant cumulative impact to these two intersections in the City of Perris would be significant and unavoidable. CEQA does not preclude a CEQA lead agency from adopting mitigation measures that might not be effective so long as the uncertainty is acknowledged and a statement of overriding considerations is adopted, which is the case in this circumstance. As an informational document, the EIR provides full disclosure for informed decision-making. It is not the purpose of CEQA or obligation of the City of Moreno Valley or this Project to assure full mitigation of an impact where the responsibility of implementing the measure is under the authority of another government jurisdiction.

E-24 - The EIR distinguishes between mitigation measures that the City is applying to address the Project's environmental impacts (Mitigation Measures, labeled "MM" in the EIR) and other mandatory measures that the Project is obligated to comply with pursuant to federal, state, and local laws and requirements (Project Requirements, labeled "PR" in the EIR). The City does not have the discretion over federal and state laws and requirements and is not exercising its discretion to make any revisions or modifications to local laws regarding the proposed Project. The EIR's characterization of Mitigation Measures and Project Requirements is appropriate. The Project Requirements specified in EIR Section 4.4, Transportation/Traffic, are proposed Project design features over which the City has discretion, so they have been changed to Mitigation Measures in the Final EIR.

E-25 - Refer to Response E-18.

E-26 - The list of cumulative projects was compiled based on lists of past, present, and probable future projects on file with the City of Moreno Valley, City of Riverside, City of Perris, and County of Riverside at the time the EIR's NOP was released for public review (December 2, 2012). Additionally, the geographic area of study was determined based on a reasonable distance at which the traffic of other projects would mix with

Responses

traffic from the proposed Project in the Project's traffic study area. Traffic from other projects beyond this distance is captured in the analysis by the application of a 2% annually compounded growth rate over five (5) years. The Commenter does not suggest any additional projects that should have been considered in the cumulative analysis. The Commenter also does not provide any evidence to demonstrate adding additional projects, if any would be appropriate to add, would result in new impacts or more severe impacts than disclosed in the EIR.

E-27 - Refer to Responses E-22 though E-26. Substantial evidence is provided to support the traffic analysis contained in the EIR.

E-28 - As noted in Table 3 of the Biological Technical Report (EIR Appendix G, Page 15), the California horned lark is a covered species under the MSHCP. Confirmation of the coverage status for this species is provided in the California Horned Lark section of Volume 2, Section B of the MSHCP Reference Document, which states: "conservation for this species will be achieved by the inclusion of at least 153,750 acres of suitable Conserved Habitat and the Core Areas within the Prado Basin, Wasson Canyon, and Mystic Lake/San Jacinto Wildlife Area, as well as a portion of the Core Area within the Murrieta/Murrieta Hot Springs area (Proposed Core 2)."

Pursuant to Moreno Valley Municipal Code Chapter 3.48 (Western Riverside County Multiple Species Habitat Conservation Plan Fee Program), the Project applicant would be required to contribute appropriate MSHCP fees to assist in the establishment of the MSHCP Reserve System, of which the Project site is not a part. Payment of this fee is considered full mitigation for the Project's impacts to covered species within the MSHCP for projects (such as the proposed Project) that are not identified as part of the Reserve System established by the MSHCP.

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 12 of 13

July 29, 2013
Page 11

for 3.2 hours during the 8 hour workday. If the number of equipment or hours of operation is increased, the noise impacts are greater. E-32

Alternatives Analysis

CEQA prohibits the narrowing of project objectives so that the analysis of project alternatives is also limited. Here the "primary" objective of the project is to construct and operate "one logistics center warehouse building … on a property designated for industrial development…" In fact, objectives A - D state the objective of the project is to develop a logistics building including one that achieves a minimum floor area ratio (FAR) of 0.5. By narrowing objectives in this manner, the Draft EIR forecloses meaningful consideration of alternatives to the proposed project. It is not clear that any of the alternatives evaluated in the Draft EIR are capable of satisfying the specific project objectives. E-33

Even so, where there is an environmentally superior alternative that significantly decreases the significant impacts of the Project then that alternative must be approved rather than the Project if that alternative is feasible. Public Resources § 21002; *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 597, State CEQA Guidelines § 15126.6(b). In this case, the reduced project alternative would reduce impacts when compared with the Project, in particular the air quality noise and traffic impacts. The reduced intensity alternative would also satisfy most of the Project objectives in that it would develop a 194,525 sf industrial building. The Draft EIR discloses that the alternative would meet all project objectives "yet to a lesser degree." Accordingly, absent legally adequate findings of infeasibility, the reduced intensity alternative must be approved over the Project. E-34

Furthermore, to satisfy CEQA's mandate that the EIR shall consider a "reasonable range" of alternatives capable of reducing or eliminating significant project impacts (Guidelines § 15126 (a)), other alternatives should be considered which would substantially reduce significant air quality impacts. These alternatives would involve putting this development to alternative uses not reliant on heavy trucks. For example, the LI and/or BPX designations permit agricultural uses and animal raising, laboratories, research and development, public administration, manufacturing and assembly, nurseries, cabinet and business schools, athletic clubs, banks, offices, public administration, etc. which would reduce the Project's operational emissions and contribution to TACs. Development of the Project site with one of the permitted uses such as with laboratories, research and development, public administration, or manufacturing and assembly would better achieve Project objectives of creating jobs and increasing economic benefits. Such a use would also be more compatible with the surrounding residential uses while reducing the number of heavy trucks accessing the site and associated air quality, health, traffic, and noise impacts. E-35

Putting the proposed development toward these uses instead of its present proposed use will substantially reduce the impacts and health risks from VOC and NOx, diesel PM, traffic, and

Responses

As noted by Section 6.8.1 of the Western Riverside County MSHCP:

"In accordance with the Habitat Conservation Plan ("No Surprises") Assurances Rule (63 Federal Register 8859, as codified in 50 C F.R. Sections 17.3, 17.22[b] and 17.32[b]), it is acknowledged that the purpose of the Western Riverside County MSHCP is to provide for the Conservation of Covered Species and the mitigation, minimization and compensatory measures required in connection with incidental taking of the Covered Species in the course of otherwise lawful and permitted activities within the MSHCP Plan Area. Accordingly, as described below and except as otherwise required by law and/ or provided under the terms of the MSHCP Plan and except for Unforeseen Circumstances, in particular as these requirements are addressed in Section 6.8.2 of this document, no further mitigation or compensation shall be required by the Service to address impacts of Covered Activities undertaken by the Permittees, Third Parties Granted Take Authorization and Participating Special Entities, pursuant to the Federal Endangered Species Act. Pursuant to 50 Code of Federal Regulations, sections 17.22(b)(5) and 17.32(b)(5), the Service shall not require from the Permittees, Third Parties Granted Take Authorization, Participating Special Entities, or other individuals or entities receiving Take Authorization under the Permits the commitment of additional land or financial compensation or additional restrictions on the use of land or other natural resources with regard to Covered Activities and their impact on Covered Species beyond that provided pursuant to the Western Riverside County MSHCP, provided that the Permittees are properly implementing the Plan, the IA and the Permits. In the event that the USFWS makes a finding of Unforeseen Circumstances and such Unforeseen Circumstances warrant the requirement of additional mitigation, enhancement or compensation measures, any such additional measures shall be restricted to modification of the management of the MSHCP Conservation Area, and shall be the least burdensome measures available to address the Unforeseen Circumstances."

Responses

To date, the Service has not made a finding of Unforeseen Circumstances requiring additional mitigation for the California horned lark. Therefore, and in accordance with the No Surprises rule of the MSHCP, the Project's payment of MSHCP fees, as required by Municipal Code Chapter 3.48, is considered full and complete mitigation for the Project's impacts to this species. Therefore, the City finds that the Project Applicant's mandatory payment of MSHCP fees represents adequate mitigation for the loss of this species.

E-29 - MSHCP Section 6.3.2 (Additional Survey Needs and Procedures) provides specific survey and conservation requirements associated with special status plant species, including the smooth tarplant. As noted in MSHCP Section 6.3.2, for sites where special status plant species have been identified, "…90% of those portions of the property that provide for long-term conservation value for the identified species shall be avoided until it is demonstrated that conservation goals for the particular species are met."

In the case of the proposed Project, the Project's biologist (URS Corporation) conducted a site-specific survey of the site for the smooth tarplant, the results of which are contained in EIR Appendix G2. As noted in Appendix G2 (refer to the "Results" section), "Due to surrounding land use on the Project site and vicinity, it is unlikely that this species would establish a larger population and impacts to these two plants is not likely to have a significant impact on the persistence of the species." A similar discussion also is provided under the discussion "Plant Species" under the analysis of Threshold 1 in EIR Section 4.5.3. Based on the professional opinion of the Project's biologist, the Project site would not provide for long-term conservation value for the smooth tarplant, and therefore does not require site-specific mitigation pursuant to MSHCP Section 6.3.2.

Please refer also to the discussion provided under Response E-28 for a discussion of why additional mitigation is not required for species, such as the smooth tarplant, that are covered by the MSHCP and for which no

Responses

finding of Unforeseen Circumstances has been made by the Service.

Therefore, the EIR correctly concludes that Project impacts to the smooth tarplant represent less-than-significant impacts that do not require mitigation, and no revision to the EIR is warranted pursuant to this comment.

E-30 - Commenter correctly describes the information provided in EIR Section 4.3.

E-31 - Regarding the construction noise analysis, the significance criteria used in the EIR is based on the City's noise ordinance for operational activities, as the City does not have any noise limits at all for construction activities. As a very conservative approach, the EIR applied the operational noise standard (60dBA at 200 feet) to the construction process. As disclosed in the EIR, there are a few non-conforming residential structures located near the property, with the closest concentration of residential homes being located north of the Perris Valley Channel, approximately 1,500 feet north of Project site's northeastern corner. As shown on EIR Tables 4.3-5 through 4.3-10, noise levels exceeding 65 dBA (assuming a clear line of sight and all assumed equipment operating simultaneously) could occur to this residential area during site preparation and grading activities (approximately 3 weeks in duration) and to a lesser extent during building construction (6 months in duration).

Mitigation restricting construction activities to weekdays would not serve to reduce the Project's construction noise impacts. The total number of days required to implement the Project would be the same regardless of whether the Project construction activities occur seven days a week or are restricted to weekdays only. Thus, a mitigation measure prohibiting construction activities during weekends only would serve to increase the total duration of each construction phase, without reducing the number of days that nearby sensitive receptors would be exposed to construction noise levels exceeding the City's standard. Furthermore, mitigation

Responses

already is imposed on the Project (refer to Mitigation Measure MM 4.3-1) that restricts construction hours to between 7:00 a.m. and 8:00 p.m. so as to minimize potential impacts to nearby sensitive receptors. Accordingly, no revision has been made to the EIR to restrict construction activities only to weekdays, as such a mitigation requirement would not be effective in reducing construction-related noise levels.

Regarding Commenter's suggestion to install a temporary noise barrier, a noise barrier can reduce sound levels by as much as 15dBA, but the use of barriers have limitations. For a noise barrier to work, it must be high enough and long enough with no openings, to block the view of the noise source. Therefore, to be effective in mitigating construction-related noise, any temporary barrier at the Project site would need to be at least 30 feet tall along San Michelle Road and stable enough to withstand wind forces and other potential hazards that may cause it to collapse into the San Michelle right-of-way. Furthermore, construction noise associated with installation of the barrier would likely occur longer than the three (3) weeks that site preparation and grading is anticipated to occur in the first place, thereby not eliminating the impact. Regardless, to reduce, but not eliminate, the Project's significant and unavoidable construction noise impact, Mitigation Measure MM 4.3-2 has been added to the EIR, as follows "As a condition of the Project's building permit, the perimeter wall planned along San Michelle Road and at the corner of San Michelle Road and Perris Boulevard shall be installed early in the construction process." It is acknowledged that this wall will have openings for driveway access, but nonetheless would partially mitigate the temporary construction-related noise impact to residents positioned north of the property.

Mitigation Measure 4.1-3(k) has been added to the Final EIR as follows "Electric-powered construction equipment and tools shall be used when technically feasible." As indicated in EIR Tables 4.3-5 through 4.3-10, all of the construction equipment cannot be feasibly powered by electricity. For example, during grading (when construction noise levels would be

Responses

highest), the primary noise generating sources would be water trucks, scrapers, graders, rubber tired dozers, excavators, and tractors/loaders/backhoes (as presented in EIR Table 4.3-7). These types of construction equipment are not commercially available in electric-powered models.

It is unclear from this comment how a noise management plan that would require review and input by the public would serve to reduce the Project's construction-related noise levels. Mitigation has been imposed on the Project (refer to EIR Mitigation Measures 4.3-1 and 4.3-2) that restricts construction hours; requires properly maintained mufflers on construction equipment; requires stationary construction equipment and staging areas to be located as close as possible to the center of the western property line (which is the portion of the site furthest away from nearby noise-sensitive uses); requires adherence to the City-approved haul routes; and requires the construction of the wall along San Michelle Road and at the corner of San Michelle Road and Perris Boulevard early in the construction process. Aside from the specific mitigation recommendations that are addressed in the paragraphs above, this comment does not identify any additional construction noise-attenuation measures that would need to be included in a noise management plan and that would serve to reduce the Project's near-term construction impacts. Accordingly, no revision has been made to the EIR to require a construction noise management plan.

E-32 - The construction noise levels shown in EIR Tables 4.3-5 through 4.3-10 were calculated using the Federal Highway Administration (FHWA) Construction Noise Model (January 2006). The usage factor identified in these tables is based on a reasonable estimate of the duration of peak noise levels (Lmax) from each piece of construction equipment. The FHWA's estimate of equipment usage factors are based on extensive measurements resulting from the FHWA's observation of actual construction activities (refer to Section 9.4.1 of the FHWA Construction Noise Model, which describes the methodology for determining the usage factors identified in the model). The usage factor is a necessary component of the Construction Noise Model because it accounts for the

Responses

fact that each individual piece of construction equipment does not operate at a constant noise level; rather, noise levels for individual pieces of equipment vary depending on the intensity of the activity. For example, a grader that is idling will produce substantially less noise than a grader that is operating at maximum capacity while moving earth materials. A usage factor must be identified in order to avoid overstating the intensity of noise levels from construction equipment. The City finds that the usage factor identified by the FHWA Construction Noise Model represents a reasonable estimate of the noise levels that could be anticipated during construction activities.

Furthermore, the usage factor identified by the FHWA Construction Noise Model does not assume that each piece of equipment operates only during limited hours of the day. On the contrary, the usage factor estimates the fraction of time each piece of equipment is operating at full power during a construction operation, as noted in Footnote 2 to EIR Tables 4.3-5 through 4.3-10. For example, the Construction Noise Model assumes that although the grader may be used throughout the 8-hour work day, the grader would only produce peak noise levels approximately 40% of the time (or 3.2 hours during an 8-hour work day). Thus, it would not be feasible for the City to impose a mitigation measure requiring that construction equipment adhere to the usage factors identified in EIR Tables 4.3-5 through 4.3-10, as such a requirement would be arbitrary and unenforceable, as well as unnecessary given the extensive research conducted by the FHWA in developing the usage factor rates for each individual piece of equipment. To address construction-related air emission effects, which also would in part also address noise sources, Mitigation Measure 4.1-3(e) has been added to the Final EIR, as follows: "During construction activity, the operating time of all pieces of off-road diesel-powered equipment shall not exceed a combined total of 75 operating hours per day." Additionally, Mitigation Measure 4.1-3(a) requires that mass grading be limited to no more than 4.0 acres per day, which also in part would address noise sources.

Responses

E-33 - The City finds that the Commenter's assertion that the Project objectives have been narrowed so as to limit the analysis of alternatives is incorrect. As stated in CEQA Guidelines § 15126.6(b), "…the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, *even if these alternatives would impede to some degree the attainment of the project objectives*, or would be more costly" (emphasis added). CEQA Guidelines Section 15126.6(c) further clarifies that one of the factors that may be relied upon in eliminating an alternative from detailed consideration in an EIR is its "failure to meet most of the basic objectives." Thus, CEQA allows for the rejection of alternatives that would fail to meet most of the basic objectives of a project, but does not allow for rejecting alternatives merely on the basis that the alternative would not meet one or more of the project's individual objectives.

As stated in EIR Section 3.2, the primary objective of the proposed Project "…is to construct and operate a logistics center warehouse building in the City of Moreno Valley on a property designated for industrial development by the Moreno Valley Industrial Area Plan (Specific Plan 208)." As stated in EIR Section 6.2 (Alternatives Considered and Rejected), alternatives that were rejected from detailed consideration in the EIR due to a conflict with the Project's objectives were not rejected simply because they did not meet one or more of the Project's objectives; rather, such alternatives were rejected only if "…they could not accomplish the basic objectives of the Project…" (Final EIR at Page 6-3). Since the Project's primary objective is to construct and operate a logistics center warehouse building, only those alternatives that did not involve the construction and operation of a logistics center warehouse building were rejected from detailed consideration due to a conflict with the Project's primary and basic objective. Other alternatives that would provide for a logistics center warehouse building were considered, even if they would impede to some degree the attainment of the various objectives listed in EIR Section 3.2. For example, Alternative 4 (Reduced Project/North Building Alternative) would not achieve the Project's objectives to achieve a minimum FAR of

Responses

0.5, and would be less effective in providing logistics center warehouse building space in comparison to the proposed Project; nonetheless, because Alternative 4 would provide for a logistics center warehouse building, it was not rejected from detailed consideration in the EIR because it would, to some degree, achieve the Project's basic and primary objective.

Therefore, the City finds that the range of Project alternatives studied in EIR Section 6.0 represents a reasonable range that is in full compliance with CEQA requirements, and further finds that the Project objectives listed in EIR Section 3.2 did not narrow the meaningful consideration of alternatives in the EIR.

E-34 - Neither CEQA nor the CEQA Guidelines provide any definition of the "environmentally superior alternative," nor do they identify any prescribed methodology for determining which alternative is "environmentally superior." Thus, it is left to the City as the Lead Agency to determine the best way to comply with the requirement in CEQA Guidelines Section 15126.6(e)(2) that the EIR identify an environmentally superior alternative, and to determine whether such alternative would "significantly decrease the significant impacts of the Project."

In the case of the Reduced Project/North Building Alternative (Alternative 4), and as cited under the "Conclusion" subheading in EIR Section 6.3.4, "…selection of the Reduced Project/North Building Alternative would not result in a reduction in demand for industrial business park development in western Riverside County; thus, it is likely for a portion of the Project's environmental impacts to occur elsewhere rather than be avoided." This is because the demand for warehouse space is driven by market conditions, and the reduction in warehouse space on-site would result in an increased demand for warehouse space in other locations within the City or nearby jurisdictions as needed to meet the regional demand for industrial warehouse space. Thus, although Alternative 4 may reduce the

Responses

site-specific air quality emissions associated with the proposed Project, overall regional emissions would not be substantially reduced because any reduction in air quality emissions on-site (due to reduced building area) would be accompanied by a concomitant increase air quality emissions in other locations as a result of the increase in building area in off-site locations as needed to satisfy the regional demand for warehouse space. Similarly, although a reduction in building area on-site may result in a reduction in the Project's cumulative near-term and unavoidable traffic impact to the intersections of Western Way/Harley Knox Boulevard and Indian Street/Harley Knox Boulevard, it is reasonable to conclude that increased development of warehouse space in other locations within the City or adjacent jurisdictions likely would result in similar (or increased) cumulative impacts to other locations within western Riverside County. Furthermore, although Alternative 4 would result in a reduction in site-specific noise levels during construction due to the decreased duration of construction activities on-site, the reduced building area on-site would merely result in increased building area at other locations within the City or adjacent jurisdictions, the construction of which would result in an increase in construction-related noise impacts at off-site locations.

Regardless, the City of Moreno Valley Planning Commission will consider adoption of Alternative 4 during public hearings for the proposed Project, and will make specific findings at that time as to whether the factors cited above provide substantial evidence to justify the rejection of Alternative 4 in accordance with CEQA Guidelines Section 15126.6.

E-35 - The Commenter's suggestion that the EIR must consider alternatives that "…would involve putting this development to alternative uses not reliant on heavy trucks…" would represent a direct conflict with the Project's primary and basic objective to "…construct and operate a logistics center warehouse building in the City of Moreno Valley on a property designated for industrial development by the Moreno Valley Industrial Area Plan (Specific Plan 208)." As stated in CEQA Guidelines Section 15126.6(c), one of the factors that may be used to

From Johnson Sedlack 1.951.506.9725 Mon Jul 29 16:01:52 2013 PST Page 13 of 13

July 29, 2013
Page 12

noise. What is more, development could potentially would meet or exceed the employment creation and economic objectives of the Project and occur in a manner that better diversifies industrial uses and jobs within the City and region (project objective E). E-35

In total, the range of project alternatives is not reasonable and the City is obligated to adopt the environmentally superior alternative in lieu of the project. E-36

Satisfaction of Project Objectives

The Project objective of increasing jobs is speculative. The Prologis Eucalyptus Industrial Park Draft EIR recently concluded that there may be an over-supply of warehousing in the City. (*See,* Prologis Eucalyptus Industrial Park Draft EIR, SCH No. 2008021002, p. 4.8-18). The EIR fails to disclose that, as a result of this oversupply of warehousing, the Project may not satisfy its own Project objectives to "attract new businesses and jobs." If the market for industrial warehousing in Moreno Valley is indeed oversaturated, this undercuts alleged benefits of the Project. E-37

Thank you for your consider of the above comments.

Sincerely,

Raymond W. Johnson
JOHNSON & SEDLACK

Responses

eliminate alternatives from detailed consideration in an EIR includes a "failure to meet most of the basic project objectives." Alternatives that would proposed to develop the site with "agricultural uses and animal raising, laboratories, research and development, public administration, manufacturing and assembly, nurseries, cabinet and business schools, athletic clubs, banks, offices, public administration, etc.," would fail to meet the Project's primary and basic objective to develop the site with a logistics center warehouse building. Furthermore, CEQA Guidelines Section 15126.6(a) clarifies that an "…EIR need not consider every conceivable alternative to a project." Accordingly, alternatives that would not involve the construction of a logistics center warehouse building have been properly rejected from detailed consideration in the EIR in accordance with CEQA Guidelines Section 15126.6, irrespective of the degree to which such alternative uses may result in reduced impacts to the environment or the degree to which such alternative uses may achieve one or more of the Project's secondary objectives.

E-36 - For the reasons stated above in Responses E-33 through E-35, the City finds that the range of alternatives studied in the EIR fully complies with CEQA Guidelines Section 15126.6. Additionally, and for the reasons cited above in Response E-34, the City further finds that Alternative 4 would not substantially reduce the Project's environmental effects, although the Planning Commission will consider adoption of Alternative 4 during public hearings for the proposed Project and, if appropriate, will be required to make specific findings demonstrating its rationale for approval of the proposed Project in lieu of Alternative 4.

E-37 - As noted in the Prologis Eucalyptus Industrial Park Draft EIR, "… the addition of industrial space from the proposed project and the adjacent West Ridge (industrial) project may create an over-supply of warehousing space in the City, *based on current economic conditions*" (pg. 4.8-18, emphasis added).

The Notice of Preparation (NOP) for the Prologis Eucalyptus Industrial

Responses

Park Draft EIR (SCH No. 2008021002) was distributed in 2008, which established the environmental baseline conditions evaluated in the Prologis EIR in accordance with CEQA Guidelines Section 15125(a). At the time the Prologis NOP was published and distributed for public review in 2008, the United States and western Riverside County had recently entered into a recession that lasted from December 2007 to June 2009, according to information available from the National Bureau of Economic Research (available on-line at http://www.nber.org/cycles.html). The 2007-2009 recession resulted in a depressed demand for industrial space within western Riverside County.

The NOP for the proposed Project was published and distributed for public review in December 2012, by which time the 2007-2009 recession had ended and economic circumstances had improved. Therefore, the statement in the Prologis Eucalyptus Industrial Park Draft EIR that there may have been a potential for over-supply of warehousing space in the City based on economic conditions that existed in 2008 does not provide substantial evidence demonstrating a potential for oversupply of warehousing space in the current post-recession era. Thus, the City finds that there is no evidence provided in this comment or anywhere in the administrative record demonstrating that there is an overabundance of warehouse space under the current post-recessionary economic conditions, and further finds that the EIR's discussion of the Project's potential benefits of providing business and jobs are valid factors to be considered by the Planning Commission during public hearings for the proposed Project.

SAN GORGONIO CHAPTER

4079 Mission Inn Avenue, Riverside, CA 92501 (951) 684-6203
Membership/Outings (951) 684-6203 Fax (951) 684-6172
Regional Groups Serving Riverside and San Bernardino Counties: Big Bear, Los Serranos, Mojave, Moreno Valley, Mountains, Tahquitz, Santa Margarita.

Good afternoon Ms Descoteaux,

The following are some Sierra Club comments on the First Inland Logistic Center II DEIR.

The FEIR needs to explain why Tier IV construction equipment and non-diesel generators are not going to be required to protect the health of Moreno Valley residents. F-1

The Sierra Club doesn't accept the information on GHG and expects the FEIR to have a more thorough explaination of this projects contribution to this major problem. F-2

The FEIR must include all warehouse/logistic center projects going through planning within in the City of Moreno Valley in the cumulative impacts or the document will be insufficient and inadequate. F-3

This project will significantly impact at least seven roadways. The FEIR must make sure that Moreno Valley residents do not need to suffer. The Sierra Club expects the FEIR to show how this will be resolved and what has been done to coordinate with the City of Perris and other projects to help resolve this unacceptable situation. F-4

The Biological impact are significant and are not fully mitigated. Out valley is home to more than 20 species of raptors and to take away all these acres from foraging is an impact. It is also an impact to possible agricultural uses which are not addressed. Two individual smooth tarplants are significant and could impact the persistence of the species -- especially if everywhere two tarplants are considered not significant and therefore allowed to be eliminated. The Sierra Club expects the FEIR to explain more on what mitigation measures will be taken for all these species -- including the western burrowing owl. The FEIR must prove that the F-5

Responses

F-1 - As concluded in the EIR, the proposed Project would not result in a direct or cumulatively significant health risk. Mitigation measures are not required to be imposed for impacts that are not significant. Also refer to Responses E-7.1 through E-8.55.

F-2 - A discussion and analysis of the Project's impacts due to greenhouse gas (GHG) emissions is provided in EIR Section 4.2. It is unclear from this comment what additional information needs to be added to Section 4.2 to fully disclose the Project's contribution to global warming. Accordingly, no revision to the EIR has been made pursuant to this comment.

F-3 - Please refer to EIR Section 4.0.2, which describes the cumulative projects assumed in the analysis of the Project's potential for resulting in cumulatively significant impacts. As noted therein, the EIR for the Project uses the summary of projections approach, except for the evaluation of cumulative traffic and vehicular-related air quality and noise impacts, which instead rely upon the list of projects approach in accordance with the City of Moreno Valley Transportation Engineering Division's Traffic Impact Analysis Preparation Guide (Final EIR at Page 4.0-2). This comment does not identify any projects that were not considered as part of the cumulative impact analyses provided in the EIR. As such, no revision to the EIR has been made pursuant to this comment.

F-4 - As discussed in EIR Section 4.4.7, although the Project would result in cumulative impacts at seven (7) roadway segments and five (5) intersections in Opening Year Cumulative (2017) Conditions, with required payment of City of Moreno Valley DIF fees and TUMF fees (see PR 4.4-3) and implementation of the DIF and TUMF-funded improvements at the cumulatively impacted facilities, all cumulatively impacted roadway segments and intersections in Opening Year Cumulative (2017) Conditions would be reduced to a less than significant impact with the exception of two (2) intersections: Western Way/Harley

Responses

Knox Boulevard and Indian Street/ Harley Knox Boulevard. Although improvements are anticipated to relieve these deficiencies in the long-term along Harley Knox Boulevard, funded by the North Perris Road Bridge and Benefit District, there is no assurance that the improvements will be in place at the time of the proposed Project's Opening Year Cumulative (2017) Conditions. Thus, the cumulative impact is considered a near-term impact, until such time as the intersection improvements are in place.

Accordingly, the EIR identifies mitigation measures to address all of the Project's impacts to study area roadways and intersections, although the impacts to Western Way/Harley Knox Boulevard and Indian Street/ Harley Knox Boulevard are conservatively assumed to comprise significant unavoidable impacts of the proposed Project under near-term conditions, prior to the completion of improvements per the North Perris Road Bridge and Benefit District. As noted above in Response C-9, these impacts are evaluated as significant and unavoidable because the Project Applicant cannot assure the timing of improvements to these intersections, and because it is not known whether all of the cumulative developments that would contribute to this cumulatively significant impact would be in place at the time of the Project's opening year in 2017. It is possible that cumulatively significant impacts to these intersections may not occur if some or all of the cumulative developments are not implemented prior to the Project's opening year (2017). Nonetheless, improvements to these intersections would occur per the North Perris Road Bridge and Benefit District, which ultimately would fully address the Project's cumulative impacts to these intersections once the necessary improvements have been implemented. It is unclear from this comment what additional mitigation would be required to resolve this situation beyond what is already specified in the Project's EIR. Accordingly, no revision to the EIR has been made pursuant to this comment.

F-5 - The proposed Project occurs within the Western Riverside County MSHCP, which has been designed to provide for the long-term conservation of habitat for plant and animal species throughout western

Responses

Riverside County. Pursuant to Moreno Valley Municipal Code Chapter 3.48 (Western Riverside County Multiple Species Habitat Conservation Plan Fee Program), the Project applicant would be required to contribute appropriate MSHCP fees to assist in the establishment of the MSHCP Reserve System, of which the Project site is not a part. Payment of this fee is considered full mitigation for the Project's impacts to covered species within the MSHCP for projects (such as the proposed Project) that are not identified as part of the Reserve System established by the MSHCP. Please refer also to Response H-3.

Impacts to agricultural resources are discussed in EIR Section 5.4.2. As indicated in the discussion therein, the Project: does not contain any Important Farmland types; is not subject to a Williamson Act Contract and is not within an agricultural preserve; would not conflict with the site's existing industrial zoning designation; and would not directly or indirectly result in the conversion of adjacent properties from agricultural to non-agricultural uses. This comment does not identify any potential impacts to agricultural resources that are not already addressed in EIR Section 5.4.2. Accordingly, no revision has been made to the EIR pursuant to this comment.

Please refer to Response E-29 for a detailed discussion of impacts to the smooth tarplant. As indicated in that discussion, the Project's biologist (URS Corporation) conducted a site-specific survey of the site for the smooth tarplant, the results of which are contained in EIR Appendix G2. As noted in Appendix G2 (refer to the "Results" section), "Due to surrounding land use on the Project site and vicinity, it is unlikely that this species would establish a larger population and impacts to these two plants is not likely to have a significant impact on the persistence of the species." Based on the professional opinion of the Project's biologist, the Project site would not provide for long-term conservation value for the smooth tarplant, and therefore does not require site-specific mitigation pursuant to MSHCP Section 6.3.2. Since the MSHCP has been designed to provide for the long-term conservation of covered species, including the

mitigations for threatened and endangered species is adequate and that nothing else is possible. F-5

In the FEIR the alternatives should include other less intense uses for these lands and then analyze everything as was tried with this project. F-6

The project needs to analyze the impact of toxic diesel emissions on the workers. They will be breathing in these emissions all day. Moreno Valley should be demanding not just jobs, but healthy jobs for its residents. F-7

Since the 2010 census showed that about 55% of Moreno Valley is Latino and almost 25% speak another language, all these environmental documents and notices need to be reissued in Spanish as should future documents/notices. F-8

Please keep the Sierra Club informed of all future meetings and documents related to this project by using the below address. F-9

Thank you,

George Hague
Sierra Club
Moreno Valley Group
Conservation Chair

26711 Ironwood Ave
Moreno Valley, CA 92555

Responses

smooth tarplant, Project impacts to the smooth tarplant would not result in a significant impact assuming mandatory payment of the City's MSHCP fees. Please refer also to Response E-28 for a discussion of why additional mitigation is not required for species, such as the smooth tarplant, that are covered by the MSHCP and for which no finding of Unforeseen Circumstances has been made by the Service. With regards to cumulative impacts to this species, individual development projects located within the Western Riverside County MSHCP would be required to conduct site-specific surveys for the smooth tarplant. If individuals are located and if those individuals occur within habitat that could provide for the long-term conservation value of the species, then pursuant to the MSHCP, 90% of the habitat providing for the long-term conservation value of the species must be preserved. Accordingly, due to the Project's compliance to the MSHCP goals and policies, Project-related impacts to the two smooth tarplant individuals on-site represent a less-than-significant impact on both a direct and cumulative basis following the payment of MSHCP fees, and no additional mitigation measures are required to address cumulative impacts to this species.

EIR Section 4.5 includes an analysis of impacts to all sensitive plant and wildlife species with a potential for occurrence on-site. As concluded in the discussion and analysis contained therein, impacts were determined to be less than significant, with exception of potential impacts to the burrowing owl. Implementation of EIR Mitigation Measure MM 4.5-1 would ensure that pre-construction surveys are conducted prior to Project grading activities, and further requires the passive or active relocation of burrowing owls in accordance with MSHCP and CDFW relocation protocol. Therefore, the City finds that the EIR fully explains all of the Project's potential impacts to biological resources, and has incorporated mitigation to address the only significant impact to the burrowing owl. Because this comment does not identify any impacts or new mitigation measures not already discussed in the EIR, no revision to the EIR has been made pursuant to this comment.

Responses

Commenter does not provide any substantive evidence to demonstrate that the Project would result in significant impacts to threatened or endangered species, beyond what is already discussed and mitigated to a level below significance in EIR Section 4.5. Furthermore, CEQA does not require individual projects to incorporate an exhaustive list of mitigation measures; rather, CEQA only requires that impacts be mitigated to a level below significance, as is already done in EIR Section 4.5. Accordingly, no revision to the EIR is warranted pursuant to this comment, and no additional mitigation measures are required.

F-6 - Please refer to Responses E-33 through E-36. It is unclear from this comment what additional alternatives require study in the EIR. An analysis of a less intensive alternative is provided in the discussion and analysis of Alternative 4 (Reduced Project/North Building Alternative) within EIR Section 6.3.4. Other "less intensive" uses on the site that do not involve the construction and operation of a logistics center warehouse building would not meet the Project's basic and primary objectives, and are rejected from detailed consideration in the EIR for the reasons stated in Response E-35. Furthermore, this comment does not identify any specific alternative for the site that should have been considered in the EIR. Accordingly, no revision to the EIR is warranted pursuant to this comment.

F-7 - The Project's potential to expose future on-site workers to toxic diesel emissions is evaluated under the discussion and analysis of Threshold 4 in EIR Section 4.1, and was based on a Project-specific Mobile Source Health Risk Assessment that is included in EIR Appendix C. As concluded in the discussion in EIR Section 4.1, at the maximally exposed individual worker (MEIW), the maximum risk is estimated to be 1.23 in one million, which does not exceed the risk threshold of 10 in one million established by SCAQMD. As such, impacts were evaluated as less than significant, and no additional mitigation is required. No revisions to the EIR are warranted pursuant to this comment, as the Commenter does not identify any deficiencies in the analysis of Project impacts to the

Responses

MEIW as contained in EIR Section 4.1.

F-8 - There is no requirement in CEQA or the CEQA Guidelines to indicate that CEQA documents and notices must be provided in Spanish. Furthermore, it is misleading to assert that the City's Latino residents speak only Spanish. Likewise, the fact that almost 25% speak another language does not demonstrate that these individuals exclusively speak another language, nor does it demonstrate that these residents all speak Spanish. Accordingly, no recirculation of the EIR or its associated notices is required.

F-9 - Comment is acknowledged; the City will provide the Sierra Club with notices of all future meetings and documents related to this project by using the contact information provided in this comment letter.

Thomas Thornsley
29177 Stevens Street
Moreno Valley, CA 92555

July 29, 2013

Ms. Julia Descoteaux
City of Moreno Valley
14177 Frederick Street/P.O. Box 88005
Moreno Valley, California 92552

Via e-mail: JuliaD@moval.org

Dear Mr. Bradshaw:

Re: Draft Environmental Impact Report (DEIR) First Inland Logistic Center II, SCH#: 2012121011

As a concerned residents, and as a member of Residents for a Livable Moreno Valley, I have reviewed the Draft Environmental Impact Report (DEIR) for the proposed First Inland Logistic Center II. I can not agree with some of the conclusions because it appears that some impacts are not being mitigated to the greatest extent possible. The City simply has not taken a progressive stand on potential development impacts nor adopted stricter criteria for development (i.e.: defined methods for greenhouse gas mitigation, operational standards to further reduce air pollutants, enhanced development standard and limited design guidelines, or full infrastructure improvements with future restitution.). As with most projects requiring EIRs this project has some significant impacts that, quite simply, are being written off because the impact can not be completely mitigated to below a level of significance. However, several impacts could be lessened with further mitigated than what is proposed; most notable with regard to Air, Greenhouse Gases, and Traffic Impacts. In these instances it would be prudent to impose mitigation(s) to further lessen those impacts, thereby, leaving a smaller intensity of impacts that to be overridden by the City Council. G-1

Project Description – There is no mention of the demolition of the existing improvements to the site nor how the loss of these impacts will impact the current user. G-2

Climate Change and Greenhouse Gases

Since the state has enacted legislation to lower greenhouse gas emissions any and all possible measures to lower emissions that could be undertaken by this project should be listed, discussed and analyzed for their effectiveness, not just a list of improvements that will exceed Title 24. The City should then include mitigation measures that significantly reduce (though they may not entirely mitigate impacts) associated impacts prior to any consideration to override them as the DEIR suggests. G-3

o This project should be designed to meet some of the highest LEEDS standards.
Mitigation measure cannot simply be recommended as stated under MM for GHG Thresholds 1 and 2 if there is to be any expectation that the project will comply with strategies in the 2006 Climate Action Team report. Change "recommended" to "required." G-4 G-5

Responses

G-1 - Comments are acknowledged. The City respectfully disagrees with the Commenter's assertion that the EIR has failed to fully evaluate or mitigate the Project's impacts, particularly with respect to the issue areas of air quality, greenhouse gas emissions, and traffic, for the reasons noted below in Responses G-3 through G-16.

G-2 - A discussion of the Project's demolition activities during construction is included in EIR Section 3.3.5.E, and includes an estimate of the total duration of demolition activities and an estimate of demolition debris that would be generated. Environmental impacts associated with the Project's demolition activities are evaluated under the EIR's discussion of impacts to air quality, noise, and greenhouse gas emissions.

The existing improvements on-site consist of a truck trailer parking area that is not needed to support any nearby uses, including the existing industrial warehouse building to the west of the proposed Project site. Specifically, the approved Plot Plan 12-0053 is required to provide for a total of 142 stalls pursuant to the City of Moreno Valley Municipal Code Chapter 9.11 (Off-Street Parking Requirements), while a total of 159 parking spaces are currently provided, in addition to the 63 existing truck trailer parking stalls. Thus, with demolition of the existing truck trailer parking area, adequate parking still would be provided for the existing industrial warehouse building to the west. Accordingly, no impact to the existing industrial warehouse building to the west would occur as a result of the proposed Project.

As the Commenter does not identify any impacts to the environment resulting from the Project's demolition activities that are not already addressed in the EIR, no revision is warranted pursuant to this comment.

G-3 - As concluded in the EIR, the proposed Project would result in a less than significant impact due to GHG emissions. Mitigation measures are not required for impacts that are less than significant. Nonetheless, the EIR sets forth Mitigation Measure MM 4.2-1 and 4.2-2 to reduce reliance

Thomas Thornsley *Comment to DEIR for First Inland Logistics Center II*
Letter date 7/29/13

Additional mitigation measures should be added that will require the installation of solar cells to offset high intensity electrical use of the offices. Should this be a speculative building or if the builder modifies the plan as proposed additional on-site renewable energy power sufficient to meet the needs of: additions to office space beyond that proposed with the approved Project plans; any additional high energy demand improvements including, but not limited to, refrigeration units, heavy machinery, manufacturing equipment, automated goods processing systems, or other equipment with high energy consumption rates not previously anticipated or assessed at the time of Project approval by the City of Moreno Valley. G-6

To further offset GHG mitigation measures should be included that require the installation of automobile recharging stations to further the advancement and use of alternative fuel vehicle by the employees while also reducing emissions. G-7

Aesthetics

Site and architectural drawing were not provided for public review with the DEIR to confirm the finding in the Initial Study. Past review of developments plans has found that only a limited application of design and architectural standards along with on-site amenities have been propose by the applicant. Further review will be required and comments may follow. G-8

Light and Glare – This area falls just within the Mount Palomar Observatory Dark Skies area and should comply with their limitation to prevent light pollution. The International Dark-Sky Association web site at: www.darksky.org lists lighting fixtures and methods to meet dark sky specifications. Add a Mitigation Measure (beyond city policy) to assure that site lighting is compatible with "Dark-Sky" specifications or limit lighting to only the use of low pressure sodium lights, full shielding above a horizontal plain and that no building or pole mounted lighting fixtures shall project light outward horizontally beyond the property boundary to eliminate the potential for nighttime light glare to motorist. G-9

Landscaping – This element could not be review at this time but will likely be addressed in the future. This project is along the main southern entry of the city and as such the street and sight landscaping should provide significant aesthetic relief to the 40-foot tall building. G-10

Traffic

It seems that DEIR states that the project will not be required to make all the improvements where needed (MM 4.4, PR 4.4-3) but will be required to pay fees but the payment of these fees will not assure their timely completion and pending completion of required improvements the Project's incremental contributions to Opening Year Cumulative traffic impacts at or affecting (certain) intersections are considered cumulatively significant and unavoidable. This project should be held responsible to further eliminate those impacts beyond just "paying the TUMF" and letting the improvement happen when they may. G-11

- How will Air Quality suffer by not actually completing the necessary traffic improvements which will lead to traffic congestion and excessive idling for prolongs time periods? G-12

Air Quality

There is no doubt that any urban development on the project site will generate long-term operational emissions that will exceed the South Coast Air Quality District's regional thresholds. G-13

2

Responses

on fossil fuel usage. Additionally, refer to Responses E-7.1 through E-7.55.

G-4 - Refer to Response E-8.49.

G-5 - An EIR sets forth feasible measures for lead and responsible agencies to consider for adoption to avoid and reduce environmental effects when they deliberate on whether or not to approve a project. The City can require Mitigation Measures 4.2-1 and 4.2-2 as part of its deliberations and require them as part of the EIR's Mitigation Monitoring and Reporting Program.

G-6 - Mitigation Measure 4.2-2 requires that the structure roof be constructed to support solar panels.

G-7 - Refer to E-8.17.

G-8 - As indicated in EIR Section 7.2, all of the Project's plans were made available for public inspection during the public review period for the EIR. Additionally, EIR Section 3.0 incorporates several images depicting Plot Plan PA12-0023 (EIR Figure 3-4), Plot Plan PA12-0023 Detail (EIR Figure 3-5), architectural elevations (EIR Figure 3-6), and the conceptual landscape plan (EIR Figure 3-7). No revisions to the EIR are warranted pursuant to this comment, as all of the Project's plans were available for public inspection during the public review period and because this comment does not identify any deficiencies in either the CEQA process for the Project or the EIR's discussion of the Project's scope.

G-9 - Lighting effects associated with the proposed Project are addressed in EIR Section 5.4.1. The City acknowledges that the Project site occurs approximately 41 miles northwest of the Mt. Palomar Observatory, and therefore the Project has the potential to result in the generation of artificial light sources that could contribute to skyglow effects that in turn could adversely affect operations at the observatory. However, the

Responses

proposed Project would be required to comply with City of Moreno Valley Ordinance No. 359 and the provisions of the Moreno Valley Industrial Area Plan (MVIAP), which require implementing projects to prevent light spillage and use full cut off' fixtures. Demonstration of compliance with Ordinance No. 359 and the Lighting standards of the MVIAP would be required prior to City issuance of a building permit. Mandatory compliance with Ordinance No. 359 and the Lighting standards of the MVIAP would ensure that Project lighting does not directly or cumulatively impact nighttime operations at the observatory. No revisions to the EIR are warranted pursuant to this comment.

G-10 - As indicated in EIR Section 7.2, all of the Project's plans were made available for public inspection during the public review period for the EIR, including the Project's conceptual landscape plan. Additionally, the EIR included the conceptual landscape plan as Figure 3-7. A description of the conceptual landscape plan also is included in EIR Section 3.3.4. This comment does not identify any specific aesthetic impacts that would result from implementation of the proposed Project; accordingly, no revision to the EIR is warranted pursuant to this comment.

G-11 - Refer to Responses C-9 and E-22.

G-12 - The air quality impacts disclosed in the EIR represent the maximum daily emissions during both construction and operational activity. Any potential emissions resulting from purported traffic congestion that may or may not occur would be well within the modeled results and evaluating any other scenario would be speculative at best.

G-13 - Refer to Responses E-13, E-26, and F-5.

Thomas Thornsley *Comment to DEIR for First Inland Logistics Center II*
Letter date 7/29/13

It is unrealistic for the City of Moreno Valley and the project proponent to disregard the cumulative impacts this project will have on this area when utilizing a scenario where much of the surrounding area is industrial and warehouse uses. This analysis should be undertaken so as to find what level of incremental increase this project will have on the overall community. G-13

- Why in there no effort made to look at the real possibility of cumulative impacts from this project and the likely land use changes surrounding this project site?

Additional tougher mitigation should be added to offset local and regional impacts to the fullest extent possible before overriding what can not be achieved. If these mean reducing the size of the project to reduce environment impacts, as a suggested in the alternatives, then it should be seriously considered. Also, there should be mitigation measures requiring a percentage of the fleet vehicle (diesel trucks) and yard equipment of future tenants to be low to zero emission vehicles. Also, diesel trucks delivering to the site shall include soot filters or the latest technological equipment available. G-14

As stated in the Traffic section may intersection improvements will not be undertaken by the project but will instead only be mitigated through the payment of improvement fees. If this is true the project will create traffic impacts that do not currently exist. G-15

- Therefore, how will Air Quality suffer by not actually completing the necessary traffic improvements which will lead to traffic congestion and excessive idling for prolongs time periods? G-16

Thank you for the opportunity to comment on the Draft EIR for this project. I request to be informed of all meetings and public hearings related to this project or other consideration in east end of Moreno Valley. Please let me know if it is possible to review a copy of the project plans so that I may provide constructive comments related to the development proposal prior to its scheduling before the Planning Commission or City Council. I would also like to request copies of any follow-up documents related to this project (copies of DEIR comment letters, 2nd DEIR and/or Final EIR). Feel free to contact me if you have any questions regarding my comments. G-17

Sincerely,

Thomas Thornsley
909-797-1397
e-mail: tomthornsley@hotmail.com

3

Responses

G-14 - Refer to Responses F-8.1 through F.8-55.

G-15 - Refer to Responses C-9 and E-22.

G-16 - Refer to Responses C-9, E-22, and G-12.

G-17 - As indicated in EIR Section 7.2, all of the Project's plans are available for public review at the City of Moreno Valley Community and Economic Development Department, Planning Division, 14177 Frederick Street, Moreno Valley, CA 92552. The City will provide all CEQA required notices to Thomas Thornsley at the contact information provided in this letter.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Palm Springs Fish and Wildlife Office
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, California 92262

In Reply Refer To:
FWS-WRIV-13B0375-13CPA0245

AUG - 5 2013

Ms. Julia Descoteaux
City of Moreno Valley
Community and Economic Development Department
14177 Frederick Street
Moreno Valley, California 92552

Subject: Draft Environmental Impact Report, First Inland Logistics Center II, City of Moreno Valley, Riverside County, California

Dear Ms. Descoteaux:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Environmental Impact Report (DEIR) for the First Inland Logistics Center II (Project) and appreciates the opportunity to comment. The proposed Project is the construction of one logistics center warehouse containing 400,103 square feet of interior space. Other components of the proposed Project include, the expansion of San Michelle Road, construction of office space, parking stalls, drive aisles, landscaping and water quality detention basins.

The proposed Project is located on 17.3 acres of land in the city of Moreno Valley in Riverside County, west of Perris Boulevard, north of Nandina Avenue, south of San Michele Road, and west of Perris Lake State Recreational Area. Although the Project site is located within the MSHCP Plan Area, it is situated outside of all designated MSHCP Criteria Cells, Cores, and Linkages. H-1

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*) and the Federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). The Service is providing the following comments in keeping with our agency's mission to work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people. H-2

Based on the information provided, the site provides habitat for tree, shrub, and/or ground-nesting birds during all or part of the year that are protected by the MBTA. The MBTA protects migratory birds and their nests, eggs, young, and parts from possession, sale, purchase, barter, transport, import and export, and take. Avoidance and minimization for nesting birds was not H-3

Responses

H-1 - The description of the proposed Project and its location as provided in this comment are accurate. No response is necessary.

H-2 - The City of Moreno Valley appreciates the role of the Service in fulfilling its mandate to protect public fish and wildlife resources and their habitats. Please refer to Response H-3 for a response to the Service's concerns and comments regarding the proposed Project.

H-3 - Comments are acknowledged. The City finds that the Project's potential to impact nesting birds already are subject to the avoidance requirements set forth by the Migratory Bird Treaty Act (MBTA). Additionally, due to the generally disturbed/developed nature of the Project site, the likelihood for occupation of the site by nesting birds is considered low. Nonetheless, and in order to ensure that the provisions of the MBTA are adhered to during Project construction activities, a new Project Requirement (PR 4.5-3) has been added to EIR Section 4.5 requiring surveys within 30 days prior to vegetation clearing activities (if clearing activities are proposed during the breeding season), and adherence to a 300- or 500-foot avoidance buffer should any nesting birds be identified on-site during the breeding season. The City Planning Division shall ensure that the Project complies with the requirements specified in Project Requirement PR 4.5-3.

With regards to the Service's comments regarding the installation of water quality basins, it should be noted that several of the water quality basins already occur on-site under existing conditions in association with the improved truck trailer parking area. Specifically, under existing conditions two (2) water quality/detention basins are located on the southern portion of the Project site, located at the property's southwestern corner and parallel to the site's frontage with Nandina Avenue. These basins were constructed as part of approved Parcel Map No. 35859 (PA07-0165) and facilitate drainage flow from the southern portion of the property to the City's storm drain system. As part of the proposed Project, these existing

Responses

Ms. Julia Descoteaux (FWS-WRIV-13B0375-13CPA0245) 2

described in the DEIR. We recommend that vegetation clearing activities take place outside of the avian breeding season (February 1 through August 31). If vegetation clearing must take place within the breeding season, a qualified biologist should conduct nesting bird surveys prior to ground disturbance. A non-disturbance buffer should be implemented for nests identified within the Project area. We suggest a 300-foot nest buffer for non-listed species and a 500-foot nest buffer for listed and raptor species. Alternatively, we encourage the on-site project biologist to coordinate with the Service to establish appropriate variant buffers. In addition, the Project's conceptual landscaping plan includes the installation of several detention basins. Vegetation associated with water retention facilities may create habitat for nesting birds. We recommend the Final Environmental Impact Report include an analysis of potential impacts to avian wildlife resulting from the maintenance and installation of the water quality detention basins. H-3

Thank you for the opportunity to review and comment on the DEIR. If you have any questions or comments about this letter or the MSHCP in general, please contact Chris Allen of this office at 760-322-2070, extension 215. H-4

Sincerely,

Kennon A. Corey
Assistant Field Supervisor

basins would be modified to accommodate two new drive entrances along Nandina Avenue and one of the basins would be divided into three sections, with one section increasing in size to compensate for the area subtracted by the two new drive aisles. Thus, because the total surface area and landscaping improvements within the water quality basins located along Nandina Avenue would not substantially change as compared to existing conditions, there would be no new impacts to avian species resulting from these basins as compared to what already occurs under existing conditions. The only new water quality basin proposed as part of the Project would occur along North Perris Boulevard and would comprise a long and narrow strip of land that would abut North Perris Boulevard. Although routine maintenance activities would be required in the new water quality basin along North Perris Boulevard, the City finds that the possibility of this water quality basin being occupied by sensitive avian species is low due to its close proximity to North Perris Boulevard, which is a high capacity roadway that generates noise levels exceeding 65 dBA at a distance of 100 feet. Based on the foregoing discussion, no revisions to the EIR appear warranted pursuant to this comment.

H-4 - The City of Moreno Valley appreciates the comments provided by the USFWS, and will contact Chris Allen at the contact information provided if there are any questions.

S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code §21000, et seq. requires that before a public agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

This Environmental Impact Report (EIR), having California State Clearinghouse No. 2012121011, has been prepared in accordance with CEQA Guidelines Article 9, §15120 to §15132, to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed First Inland Logistics Center II Project (herein, "the Project"). This EIR does not recommend either approval or denial of the proposed Project; rather, it is a source of impartial information regarding potential impacts that the Project may cause to the physical environment. The Draft EIR will be available for public review for a period of 45 days. After consideration of public comment, the City of Moreno Valley will consider certifying the Final EIR and adopting required findings in conjunction with Project approval. In the case that there are any adverse environmental impacts that cannot be fully mitigated, the City of Moreno Valley must adopt a Statement of Overriding Considerations if it approves the Project, stating why the Project is being approved despite its unavoidable impacts.

This Executive Summary has been prepared in accordance with CEQA Guidelines §15123. The scope of this EIR covers five (5) primary subject areas determined through the completion of an Initial Study prepared by the City of Moreno Valley pursuant to CEQA Guidelines §15063, and in consideration of public comment received by the City in response to this EIR's Notice of Preparation (NOP). The Initial Study, NOP, and written comments received by the City in response to the NOP are attached to this EIR as *Technical Appendix A*. As determined by the Initial Study and in consideration of public comment on the NOP, the five (5) environmental subject areas that could be reasonably and significantly affected by the Project are analyzed herein, including:

1. Air Quality
2. Greenhouse Gas Emissions
3. Noise
4. Transportation/Traffic
5. Biological Resources

Refer to Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. As mentioned, the scope of this EIR includes these five (5) subject areas as determined through the completion of an Initial Study pursuant to CEQA Guidelines §15063, and in consideration of public comment to this EIR's NOP. Subject areas for which the Initial Study concluded that impacts would be clearly less than significant and that do not warrant further analysis in this EIR are addressed in Subsection 5.4, *Effects Found Not to Be Significant as Part of the Initial Study Process*. For each of the five (5) subject areas analyzed in Section 4.0, this EIR describes: 1) the physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse (December 2012); 2) discloses the type and magnitude of potential

environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid any significant adverse environmental impacts that the Project may cause. A summary of the Project's significant environmental impacts and the mitigation measures imposed by the City of Moreno Valley to lessen or avoid those impacts is included in this Executive Summary as Table S-1, *Mitigation Monitoring and Reporting Program*.

This EIR also discusses alternatives to the proposed Project. Alternatives are studied that would attain most of the Project objectives while avoiding or substantially lessening the proposed Project's significant environmental effects. A full discussion of Project alternatives is found in EIR Section 6.0, *Alternatives*.

S.2 PROJECT OVERVIEW

S.2.1 LOCATION AND REGIONAL SETTING

The 17.3-acre Project site is located in the City of Moreno Valley, in western Riverside County, California. From a regional perspective, the Project site is located to the north and northeast of the City of Perris and to the southeast of the City of Riverside. The March Air Reserve Base (ARB) is located approximately 0.9-mile west of the site. The property is rectangular-shaped and located immediately west of North Perris Boulevard, south of and adjacent to San Michele Road, approximately 1,150 feet east of Knox Street, and north of and adjacent to Nandina Avenue. This portion of the City of Moreno Valley is developing as a center for distribution warehousing and light industrial land uses. Currently, the Project site is surrounded by a mixture of warehouse buildings, undeveloped lands, and other land uses located on properties designated and zoned for industrial development. Refer to Subsections 2.1, 2.2, and 2.3 of this EIR for more information about the Project's location and regional setting.

S.2.2 EXISTING PHYSICAL CONDITIONS

The northern half of the Project site (approximately 8.9 acres) is an undeveloped vacant lot and is routinely maintained (e.g., disced) to remove vegetation that may pose a wildland fire hazard. The southern half of the site (approximately 8.4 acres) is developed as a parking lot that is used for truck trailer parking, with a driveway access provided from Nandina Avenue and landscaping provided along Nandina Avenue and Perris Boulevard. Additional landscaping is located at the boundary between the existing parking lot in the south and the undeveloped portion of the site in the north. There are no unique land uses, topographic features, or environmental resources present on the property.

S.2.3 PROJECT OBJECTIVES

The primary objective of the proposed Project is to construct and operate one logistics center warehouse building in the City of Moreno Valley on a property designated for industrial development by the Moreno Valley Industrial Area Plan (Specific Plan 208). The following is a list of specific objectives sought by the proposed Project.

A. To construct and operate a logistics center warehouse building in the City of Moreno Valley on a property designated for industrial development by the City of Moreno Valley General Plan and the Moreno Valley Industrial Area Plan (Specific Plan 208.)

B. To develop a logistics center warehouse building that is feasible to construct and operate and that appeals to light industrial and warehouse distribution tenants seeking to locate in the Moreno Valley area.

C. To make efficient use of property designated for industrial development by developing a logistics center warehouse building on a property that is adjacent to existing warehouse development and that achieves a minimum floor area ratio (FAR) of 0.5.

D. To construct and operate a logistics center warehouse building within five miles of major regional transportation corridors.

E. To attract new businesses and jobs to the City of Moreno Valley, thereby providing a more equal jobs/housing balance both in the city and in Riverside County and reducing the need for members of the existing local workforce to commute outside the area for employment.

S.2.4 BACKGROUND

The proposed Project site is located within the geographical limits of the Moreno Valley Industrial Area Plan (Specific Plan (SP) 208), which designates the property as "Industrial." The Project site was the subject of previous environmental review under CEQA as part of the EIR certified in 1989 for SP 208 (State Clearinghouse Number 1988080813). More recently, in 2008, the City of Moreno Valley approved Tentative Parcel Map No. 35859 (PA07-0165) and two Plot Plans (PA07-0166 and PA07-0167) that covered the southern portion of the Project site and additional property located to the immediate west. For that project, the City prepared a Mitigated Negative Declaration (2008 MND) in compliance with CEQA (SCH No. 2008101041). That approved project consisted of a 700,000 s.f. warehouse building west of the currently proposed Project site, which is constructed and occupied by Harbor Freight Tools, and an 180,000 s.f. warehouse building on the southern portion of the currently proposed Project site which is not constructed.

In 2011, Addendum No. 1 to the 2008 MND was prepared to address minor design modifications to the approved buildings, parking stalls, and driveways, as well as a proposal to construct an interim truck parking lot with 213 stalls on the southern portion of the currently proposed Project site (at the approximate location of the originally approved 180,000 s.f. building). That project was constructed and the southern portion of the currently proposed Project site is now developed as an interim truck parking lot, although the original approval of an 180,000 s.f. building remains valid and could be implemented in the future. In 2012, the City of Moreno Valley approved a site plan (P12-061) to allow the expansion of the interim truck parking lot constructed on the southern portion of the Project site across the northern portion of the Project site. For this project, the City prepared Addendum No 2 to the 2008 MND. The parking lot expansion has not yet been constructed and under existing conditions the northern portion of the Project site remains vacant.

S.2.5 PROJECT DESCRIPTION SUMMARY

The Project proposes to develop a 17.3-acre property with one logistics center warehouse building containing 400,130 square feet (s.f.) of interior building space. Associated improvements to the property would include, but are not limited to 59 loading bays, surface parking areas, drive aisles, utility infrastructure, landscaping, exterior lighting, signage, and water quality/detention basins. Construction of the proposed Project involves demolition and removal of the existing parking lot, grading of the 17.3-acre property, and construction of the proposed building. One discretionary action is requested of the City of Moreno Valley to implement the Project, PA12-0023. The

proposed building is designed to contain 394,130 s.f. of warehouse space and 6,000 s.f. of office and mezzanine space. The front door and office would be positioned at the southeast corner of the building, facing the intersection of Perris Boulevard/Nandina Avenue. On the 17.3 acre property, 0.3 acres would be dedicated to the City of Moreno Valley for the widening of San Michele Road, so the total net parcel acreage is 17.0 acres. Over the 17.0 net acre parcel, the proposed building would calculate to a floor area ratio (FAR) of 0.51.

S.3 EIR PROCESS

As a first step in complying with the procedural requirements of CEQA for an EIR, an Initial Study was prepared by the City of Moreno Valley to determine whether any aspect of the proposed Project, either individually or cumulatively, may cause a significant adverse effect on the physical environment (refer to EIR *Technical Appendix A*). After completion of the Initial Study, the City filed a NOP with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared. In turn, the Initial Study and NOP were distributed for a minimum 30-day public review period, which ended on January 14, 2013.

Written comments on the scope of the EIR were received during the NOP comment period, and were considered by the City during the preparation of this EIR. For this Project, the Initial Study indicated that this EIR should focus on four (4) environmental subject areas. As a result of considering the public comment submitted as part of the NOP process, one (1) additional subject area was added (biological resources) to the scope of the EIR. Therefore, this EIR focuses on five (5) primary environmental topics: air quality, greenhouse gas, noise, traffic/circulation, and biological resources.

This EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for a 45-day review period. During the 45-day public review period, public notices announcing availability of the Draft EIR will be mailed to interested parties, advertisements will be posted in the local newspaper, and copies of the Draft EIR and its Technical Appendices will be available for review at the locations indicated in the public notices.

After the close of the 45-day Draft EIR public comment period, responses to written comments on the environmental effects of the proposed Project will be prepared and published. The Final EIR will then be considered for certification by the City of Moreno Valley Planning Commission during a public hearing(s). The Planning Commission will review and consider the Final EIR prior to deciding to approve, approve with revision, or reject the proposed Project. Approval of the proposed Project would be accompanied by the adoption of written findings and a statement of overriding considerations for any significant unavoidable environmental impacts identified in the Final EIR. In addition, the City must adopt a Mitigation, Monitoring, and Reporting Program (MMRP), which describes the process to ensure implementation of the mitigation measures identified in the Final EIR to reduce or avoid significant impacts on the physical environment. The MMRP, which is included as Table S-1 in this EIR, will ensure CEQA compliance during Project construction and operation. The decision of the Planning Commission is appealable to the Moreno Valley City Council.

S.4 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines §15123(b)(2) requires that areas of controversy known to the Lead Agency (City of Moreno Valley) be identified in the Executive Summary. In consideration of the comments received in response to the NOP, the City of Moreno Valley has identified one area of controversy.

The South Coast Air Quality Management District (SCAQMD) suggested that mitigation measures be applied for air quality impacts that go beyond what is required by law. The City of Moreno Valley applies mitigation measures which it determines to be feasible and practical for the Project Applicant to implement and the City of Moreno Valley to monitor and enforce. Although some of these measures may go beyond what the law requires, the imposed measures must have an essential nexus to the Project's impacts, be feasible to implement and enforce, be legal for the City to impose, and result in a benefit to the physical environment. Due to the non-attainment status of the South Coast Air Basin for the federal 8-hour ozone standard, there is controversy regarding the feasibility of applying mitigation measures for nitrogen oxide (NOx) mobile source emissions on a project-by-project basis beyond those required by federal and state law, and the resultant benefits, if any, to regional air quality.

Regarding issues to be resolved, this EIR addresses the environmental issues that are known by the City and that are identified in the Initial Study prepared for the Project (refer to *Appendix A* of this EIR). Eight (8) written comment letters were received by the City on this EIR's NOP, copies of which are also included in *Appendix A*. Environmental topics raised in written comment to the NOP are primarily related to the issue areas of air quality, environmental and human health hazards, traffic, biological resources, agriculture, cultural resources, and soils. Refer to Table 1-2, *Summary of NOP Comments*, in Section 1.0 of this EIR.

S.5 ALTERNATIVES TO THE PROPOSED PROJECT

In compliance with CEQA Guidelines §15126.6, an EIR must describe a range of reasonable alternatives to the Project or to the location of the Project. Each alternative must be able to feasibly attain most of the Project's objectives and avoid or substantially lessen the Project's significant effects on the environment. A detailed description of each alternative evaluated in this EIR, as well as an analysis of the potential environmental impacts associated with each alternative, is provided in Section 6.0, *Alternatives to the Proposed Project*. Also described in Section 6.0 is a list of alternatives that were considered but rejected from further analysis. The alternatives considered by this EIR include those listed below.

S.5.1 ALTERNATIVE 1 – NO PROJECT/TRAILER YARD ALTERNATIVE

The No Project Alternative/Trailer Yard Alternative is included in the alternatives analysis as required pursuant to CEQA Guidelines §15126.6(e), which requires evaluation of an alternative that considers what would reasonably be expected to occur on the property in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services. For purposes of analysis in this EIR, the No Project/Trailer Yard Alternative assumes that the Project site would be developed in accordance with its existing entitlements pursuant to previously approved Amended Plot Plan P12-061. Under this alternative, improvements on the site would involve the expansion of the existing truck trailer parking yard to the northern portion of the property, thereby increasing the number of truck trailer parking spaces on-site from 338 spaces to 722 spaces. Access to the property would be afforded via a driveway along San Michele Road, and via the existing driveway located along Nandina Avenue. With exception of near-term noise impacts, all significant effects of the proposed Project would be avoided or lessened by the selection of this alternative. However, this alternative would not achieve the objectives of the Project.

S.5.2 ALTERNATIVE 2 – NO PROJECT/INDUSTRIAL BUILDING ALTERNATIVE

The No Project/Industrial Building Alternative also is included in the alternatives analysis as required pursuant to CEQA Guidelines §15126.6(e). This alternative assumes that the proposed Project is not approved, and that the site would be developed in accordance with existing entitlements. Under this alternative, the northern portion of the site would be developed with a truck trailer yard consisting of approximately 384 trailer spaces, as approved by Amended Plot Plan P12-061, while the southern portion of the site would be developed with a 181,031 s.f. industrial building with 26 dock doors pursuant to previously approved Plot Plan PA07-0167. To construct the building, the existing parking lot located in the southern portion of the property would be demolished. Access to the site would be provided via driveways along Nandina Avenue, Perris Boulevard, and San Michele Road. The No Project/Industrial Building Alternative would meet most of the Project's objectives, but generally to a lesser degree. Implementation of this alternative would avoid the Project's significant and unavoidable near-term impact to transportation/traffic, and would reduce the magnitude of many of the other Project-related impacts that are related to building intensity. However, this alternative would reduce, but would not fully avoid, the proposed Project's impacts due to long-term operational-related emissions of NO_x, and would reduce but not fully avoid the proposed Project's significant unavoidable impact due to construction-related noise.

S.5.3 ALTERNATIVE 3 – REDUCED PROJECT/SMALL BUILDINGS ALTERNATIVE

The Reduced Project/Small Buildings Alternative considers development of the site with two smaller industrial buildings consisting of a 194,525 s.f. building in the northern portion of the site and a 181,031 s.f. building in the southern portion of the site. There would be a total of 375,556 s.f. of interior floor space in two structures, which is 24,574 s.f. less than the proposed Project (a 6% reduction in building area). Access to the site would be provided via driveways along Nandina Avenue, Perris Boulevard, and San Michele Road. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project (one larger building that is likely to attract one tenant) against the environmental effects of constructing two smaller buildings that are likely to attract two different tenants. Implementation of this alternative would generate more traffic. Therefore, it would increase the proposed Project's significant and unavoidable impacts to long-term air quality (NO_x emissions) and near-term transportation/traffic, and would generally increase other Project-related operational impacts that are related to average daily traffic volumes. The Reduced Project/Small Buildings Alternative would meet all of the Project's objectives, except it may have more difficulty meeting the objective to construct a logistics center that appeals to tenants seeking to locate in the Moreno Valley area due to the smaller sized buildings as compared to the larger building proposed by the Project.

S.5.4 ALTERNATIVE 4 – REDUCED PROJECT/NORTH BUILDING ALTERNATIVE

The Reduced Project/North Building Alternative is identified as the Environmentally Superior Alternative. It would involve no changes to the existing trailer parking yard in the southern portion of the site, while the northern portion of the site would be developed with a 194,525 s.f. industrial building. This alternative would construct 205,605 s.f. less building area than the proposed Project (a reduction in building area by approximately 51%). Site access under this alternative would be afforded via new driveways along San Michele Road and Perris Boulevard, while the existing access via the adjacent lot along Nandina Avenue would be maintained. Implementation of this alternative would reduce the proposed Project's significant unavoidable impacts to near- and long-term air

quality, near-term noise, and near-term transportation/traffic, although such impacts would not be fully avoided under this alternative. Other Project-related operational impacts that are related to average daily traffic volumes also would be reduced under this alternative. The Reduced Project/North Building Alternative would meet most of the Project's objectives, but generally to a lesser degree. Selection of the Reduced Project/North Building Alternative, while providing less building space on the property, would not result in a reduction in demand for industrial business park development in western Riverside County; thus, it is likely for a portion of the Project's environmental impacts to occur elsewhere rather than be avoided.

S.6 SUMMARY OF IMPACTS, PROJECT REQUIREMENTS, MITIGATION MEASURES, AND CONCLUSIONS

S.6.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

The scope of this EIR includes five (5) subject areas as determined through the completion of an Initial Study prepared by the City of Moreno Valley pursuant to CEQA Guidelines §15063 and CEQA Statute §21002.1(e), as well as consideration of public comments received by the City on this EIR's NOP. The Initial Study, NOP, and public comments received in response to the NOP, are attached to this EIR as *Technical Appendix A*. Subject areas for which the Initial Study concluded that impacts would be clearly less than significant and that do not warrant further analysis in this EIR include: aesthetics, agricultural resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality, land use/planning , mineral resources, population and housing, public services, recreation, and utilities/service systems. The EIR addresses these topics in EIR Subsection 5.4, *Effects Found Not to be Significant as Part of the Initial Study Process*.

S.6.2 IMPACTS OF THE PROPOSED PROJECT

Table S-1, *Mitigation, Monitoring, and Reporting Program*, provides a summary of the proposed Project's environmental impacts, as required by CEQA Guidelines §15123(a). Also presented are the Project's design features and mandatory project requirements that would serve to reduce or avoid impacts, as well as the mitigation measures imposed on the Project by the City of Moreno Valley to further avoid adverse environmental impacts or to reduce their level of significance.

Table S-1 Mitigation, Monitoring, and Reporting Program

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
4.1 Air Quality					
Applicable Project Requirements					
	PR 4.1-1 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 402, "Nuisance."	Project Construction Manager, Project Tenants	South Coast Air Quality Management District (SCAQMD)	During construction activities and ongoing during long-term operation	
	PR 4.1-2 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust." Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving activities, grading, and equipment travel on unpaved roads.	Project Construction Manager	SCAQMD	During construction activities	
	PR 4.1-3 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 431.2, "Sulfur Content of Liquid Fuels."	Project Construction Manager, Project Tenants	SCAQMD	During construction activities and ongoing during long-term operation	
	PR 4.1-4 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, "Architectural Coatings."	Project Construction Manager, Project Tenants	City of Moreno Valley Building and Safety Division, SCAQMD	During construction activities and ongoing during long-term operation	
	PR 4.1-5 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1186, "PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations."	Project Construction Manager	SCAQMD	During construction activities	
	PR 4.1-6 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1186.1, "Less-Polluting Street Sweepers."	Project Construction Manager	SCAQMD	During construction activities	

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	PR 4.1-7 The Project is required to comply with California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025, "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles."	Project Construction Manager, Project Tenants	SCAQMD	During construction activities and ongoing during long-term operation	
	PR 4.1-8 The Project is required to comply with California Code of Regulations Title 13, Division 3, Chapter 10, Article 1, Section 2485, "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling."	Project Tenants	SCAQMD	Ongoing during long-term operation	
	PR 4.1-9 The Project is required to comply with California Code of Regulations Title 24, "California Building Standards Code" and the "California Green Building Code."	Project Architect	City of Moreno Valley Building and Safety Division	Prior to issuance of building permit and during construction activities	
Summary of Impacts					
Threshold 1: The proposed Project would not conflict with or obstruct implementation of the SCAQMD's AQMP.	Mitigation is not required.	N/A	N/A	N/A	Less than Significant Impact
Thresholds 2 and 3: Emissions during Project construction (near-term) would violate the SCAQMD regional thresholds for VOCs and NOx. In addition, emissions during Project operation (long term) are projected to exceed the SCAQMD regional threshold for NOx. Near-term emissions of VOCs and near- and long-term emissions of NOx also would contribute to an existing air quality violation in the SCAB (i.e., non-attainment status for O_3) because both VOCs and NOx are precursors for O_3. As such, Project-related air emissions would violate SCAQMD air quality standards and contribute to the non-attainment status of a criteria pollutant (i.e., O_3). These Project-related air emissions are concluded to be a significant impact on a direct and cumulative basis.	**PM10 Emissions – Near Term** **MM 4.1-1** Prior to grading permit issuance, the City shall verify that the following notes are specified on the grading plan to ensure implementation of SCAQMD Rule 403. It should be noted that the following list is non-exclusive, and identifies only key provisions of the SCAQMD Rule 403 requirements; regardless the Project shall be required to comply with all applicable provisions of SCAQMD Rule 403, whether listed below or not. Specifically, Project contractors shall be required to comply with the following notes and all other applicable SCAQMD Rule 403 requirements, and shall maintain written records of such compliance that can be inspected by the City of Moreno Valley upon request. All clearing, grading, earth-moving, and excavation activities shall cease when winds exceed 25 miles	Project Engineer/ Project Construction Manager	City of Moreno Valley Planning Division and Land Development Division	Prior to the issuance of grading permit(s) and during construction activities	Near-Term Construction (VOC and NOx emissions): Less than Significant Impact. Long-Term (NOx): Significant Unavoidable Direct and Cumulative Impact

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	per hour. All unpaved roads and disturbed areas shall be watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day. The contractor shall ensure that traffic speeds on unpaved roads and areas where soil is exposed are reduced to 15 miles per hour or less. Public streets shall be swept at the end of each workday using a street sweeper meeting SCAQMD Rule 1186.1 if visible soil is carried onto paved public roads. The cargo area of all vehicles hauling soil, sand, or other loose earth materials shall be covered.				
	MM 4.1-2 Prior to the start of grading, the construction contractor shall post legible, durable, weather-proof signs at the property's frontage with Perris Boulevard, San Michelle Road, and Nandina Avenue stating the name and phone number of an authorized individual to be contacted to resolve dust complaints. Proof of sign posting in the form of photographs shall be placed on file with the City of Moreno Valley. These signs shall remain posted on the property until grading is complete. All legitimate dust complaints shall be resolved in 24 hours.	Project Construction Manager	City of Moreno Valley Planning Division and Land Development Division	Prior to the issuance of grading permit(s) and during construction activities	
	<u>NOx Emissions – Near-Term</u>				
	MM 4.1-3 Prior to grading permit and building permit issuance, the City shall verify that the following notes are specified on all grading and building plans. Project contractors shall be required to comply with these notes and permit periodic inspection of the construction site by City of Moreno Valley staff to confirm compliance.	Project Applicant/ Developer	SCAQMD, City of Moreno Valley Planning Division, Building and Safety Division, and Land Development Division	Prior to the issuance of grading permit(s) and building permit(s) and during construction activities	

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	Mass grading shall be limited to no more than 4.0 acres per day. During construction activity, diesel engines shall not idle in excess of three (3) minutes. All construction-related equipment shall be CARB Certified. Temporary traffic control for construction vehicles entering and exiting the site shall be implemented pursuant to the requirements of the California Manual on Uniform Traffic Control Devices. During construction activity, the operating time of all pieces of off-road diesel-powered equipment shall not exceed a combined total of 75 operating hours per day. Construction-related haul trips entering and existing the site shall occur during non-peak traffic hours. The construction contractor shall encourage construction site employees to rideshare by offering incentives or other inducements. High pressure injectors shall be used on all diesel powered construction equipment over 100 horsepower. All construction-related on-road diesel-powered haul trucks shall be 2007 or newer model year or 2010 engine compliant vehicles. On all construction-related equipment that has a particulate trap, the trap shall be Level 3 CARB certified. Electric-powered construction equipment and tools shall be used when technically feasible. Biodiesel fuel or other alternatives to diesel fuel shall be used to power construction equipment when technically feasible.				

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	Construction vehicles shall use the City's designated truck route. Construction parking shall be located and configured to minimize traffic interference on public streets. Import of earth materials and on-site grading activities shall not occur on the same day. No more than 66 loads of earth material (about 2,000 cubic yards) shall be brought to the site in any given day.				
	VOC Emissions – Near Term				
	MM 4.1-4 Prior to building permit issuance, the City shall verify that the following note is specified on all building plans. Project contractors shall be required to comply with these notes and maintain written records of such compliance that can be inspected by the City of Moreno Valley upon request. All surface coatings shall consist of Zero-Volatile Organic Compound paints (no more than 150 gram/liter of VOC) and/or be applied with High Pressure Low Volume (HPLV) applications consistent with SCAQMD Rule 1113. Alternatively, building materials may be used that do not require painting or are delivered to the construction site pre-painted.	Project Construction Supervisor	City of Moreno Valley Planning Division, Building and Safety Division, and Land Development Division	Prior to the issuance of building permit(s) and during construction activities	
	NOx Emissions – Long-Term				
	MM 4.1-5 Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than three (3) minutes; and 3) telephone numbers of the building facilities manager and the CARB to report	Project Applicant/ Developer	City of Moreno Valley Building and Safety Division and Planning Division	Prior to the issuance of occupancy permit(s)	

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	violations. Prior to occupancy permit issuance, the City shall conduct a site inspection to ensure that the signs are in place.				
	MM 4.1-6 Prior to the issuance of building permits, the City shall verify that the parking lot striping and security gating plan allows for adequate truck stacking at gates to prevent queuing of trucks outside the property.	Project Applicant/ Developer	City of Moreno Valley Planning Division	Prior to the issuance of building permit(s)	
	MM 4.1-7 Prior to the issuance of occupancy permits, the Project's property owner shall provide documentation to the Planning Division verifying that provisions are included in the building's lease agreement that inform tenants about the availability of: 1) alternatively fueled cargo handling equipment; 2) grant programs for diesel fueled vehicle engine retrofit and/or replacement; 3) designated truck parking locations in the City of Moreno Valley; 4) access to alternative fueling stations in the City of Moreno Valley that supply compressed natural gas (closest station is located on Indian Street, south of Nanina Avenue); and 5) the United States Environmental Protection Agency's SmartWay program.	Project Applicant/ Developer	City of Moreno Valley Planning Division	Prior to the issuance of occupancy permit(s)	
	MM 4.1-8 In the event that the building design is modified to accommodate refrigeration, all loading docks shall be equipped with an electrical hookup to power refrigerated tractor trailers	Project Applicant/ Developer	City of Moreno Valley Planning Division	Prior to the issuance of building permits for any building design that accommodates refrigeration	
Threshold 4: Near-term construction and long-term operation of the proposed Project would not expose nearby sensitive receptors to substantial pollutant concentrations of any criteria pollutant or diesel particulate matter. As such, a less than significant impact would occur.	Mitigation is not required.	N/A	N/A	N/A	Less than Significant Impact
Threshold 5: The Project does not propose land uses or operational activities associated with emitting objectionable odors. Any odor emissions generated during Project construction would be short term, not	Mitigation is not required.	N/A	N/A	N/A	Less than Significant Impact

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
objectionable, and not affect a substantial population. Therefore, impacts due to odors would be less than significant.					
4.2 Greenhouse Gas Emissions					
Applicable Project Requirements					
	PR 4.2-1 The Project is required to comply with mandatory regulatory requirements imposed by the State of California and the South Coast Air Quality Management District aimed at the reduction of air quality emissions. Those that are applicable to the Project and that would assist in the reduction of Project-related GHG emissions include, but are not limited to the following: a) Global Warming Solutions Act of 2006 (AB32). b) Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375). c) Pavely Fuel Efficiency Standards (AB1493), which establishes fuel efficiency ratings for new vehicles. d) California Code of Regulations Title 13, Division 3 addressing diesel exhaust emissions. Specifically, Chapter 1, Article 4.5, §2025, "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles" and Chapter 10, Article 1, §2485, "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling." e) California Code of Regulations Title 24 (California Building Code), which establishes energy efficiency requirements for new construction. f) California Code of Regulations Title 20 (Appliance Energy Efficiency Standards), which establishes energy efficiency requirements for	Project Applicant/ Developer	City of Moreno Valley Planning Division and Building and Safety Division	Prior to the issuance of building permit(s) and ongoing during long-term operation	

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	appliances. g) Title 17 California Code Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020. h) California Water Conservation in Landscaping Act of 2006 (AB1881), which requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduce water waste in existing landscapes. i) Statewide Retail Provider Emissions Performance Standards (SB 1368), requiring energy generators to achieve performance standards for GHG emissions. j) Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2012 and 33 percent by 2020. k) South Coast Air Quality Management District Rule 1118 "PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations," and Rule 1186.1 "Less Polluting Street Sweepers."				
	PR 4.2-2 The Project will provide on-site bicycle storage pursuant to City of Moreno Valley Municipal Code §9.11.060.B, Off-Street Bicycle Parking Requirements.	Project Applicant/ Developer	City of Moreno Valley Planning Division and Building and Safety Division	Prior to the issuance of building permit(s)	N/A
	PR 4.2-3 The Project will comply with all applicable provisions of the City of Moreno Valley Municipal Code Chapter 6.02 "Refuse Collection, Transfer and Disposal" and Chapter 8.80 "Recycling and Diversion of Construction and Demolition Waste."	Project Applicant/ Developer	City of Moreno Valley Building and Safety Division	Prior to the issuance of building permit(s)	N/A
Summary of Impacts					
Thresholds 1 and 2: The proposed Project would not generate GHG emissions, either directly or indirectly, in quantities that may	Impacts would not be significant; therefore, mitigation measures are not required. Regardless, to ensure that the Project will comply with				Less than Significant Impact

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
have a direct or cumulatively considerable significant impact on the environment. In addition, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	applicable GHG emission reduction strategies specified in California's 2006 Climate Action Team report, the following mitigation measures are recommended.				
	MM 4.2-1 Prior to the approval of building permits, the City shall review the building plans to ensure that the building's mechanical/electrical /plumbing (MEP) plans specify the installation of U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads (if showers are proposed).	Project Applicant/ Developer	City of Moreno Valley Planning Division and Building and Safety Division	Prior to the issuance of building permit(s) and as part of final building inspection	
	MM 4.2-2 Prior to the approval of building permits, the City shall review the building plans to ensure that the building's roof is structurally designed to accommodate the future addition of photovoltaic solar panels.	Project Applicant/ Developer	City of Moreno Valley Planning Division and Building and Safety Division	Prior to the issuance of building permit(s) and as part of final building inspection	
4.3 Noise					
Applicable Project Requirements					
	PR 4.3-1 The Project is required to comply with the City of Moreno Valley Noise Ordinance (Moreno Valley Municipal Code Chapter 11.80).	Project Construction Manager, Project Tenants	City of Moreno Valley Code and Neighborhood Services Division	During construction activities and ongoing during long-term operation	N/A
Summary of Impacts					
Thresholds 1, 3, and 4: During Project construction, noise levels beyond 200 feet from the property boundary would exceed levels specified in the City of Moreno Valley Noise Ordinance. Existing sensitive receptors (residential) located within 2,774 feet of the Project boundary with a clear line of site to the construction activity would experience noise levels above 65 dBA leq at some point during the construction process. Additionally, in the event that Project construction activities occur simultaneously with other construction activities that affect the same sensitive receptors, cumulative construction-related noise would also be significant. Under long-term operating conditions, the Project would not generate traffic-related or	**MM 4.3-1** Prior to grading or building permit issuance, the City shall review grading and building plans to ensure that the following notes are included. Project contractors shall be required to comply with these notes and maintain written records of such compliance that can be inspected by the City of Moreno Valley upon request. a) All construction activities, including but not limited to haul truck deliveries, shall be limited to between the hours of 7:00 a.m. and 8:00 p.m. b) Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. c) All stationary construction equipment and equipment staging areas shall be placed as close as	Project Construction Manager	City of Moreno Valley Land Development Division and Building and Safety Division	Prior to the issuance of grading permit(s) and building permit(s)	Significant Unavoidable Direct and Cumulative Impact (Near-Term)

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
stationary noise levels above the standards given in the City of Moreno Valley Noise Ordinance or in any adjacent jurisdiction's General Plan. Long-term impacts would be less than significant.	possible to the center of the western property line. d) All haul truck deliveries shall use City-approved haul routes. Should alternate routes be necessary, haul trucks shall not use roadways that pass noise-sensitive land uses or residential dwellings unless approved by the City of Moreno Valley. **MM 4.3-2** As a condition of the Project's building permit, the perimeter wall planned along San Michelle Road and at the corner of San Michelle Road and Perris Boulevard shall be installed early in the construction process	Project Applicant/ Developer	City of Moreno Valley Planning Division	During Project construction	
Threshold 2: Near-term construction activities and long-term operation of the proposed Project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels.	Mitigation is not required.	N/A	N/A	N/A	Less than Significant Impact
Threshold 5: The Project would not expose people to excessive noise levels associated with the operation of an airport.	Mitigation is not required.	N/A	N/A	N/A	Less than Significant Impact
Threshold 6: There are no private airstrips in the vicinity of the Project site; as such, the Project has no potential to expose people residing or working in the area to excessive noise levels associated with operation of a private airstrip.	Mitigation is not required.	N/A	N/A	N/A	No Impact
4.4 Transportation/Traffic					
Summary of Impacts					
Threshold 1: The proposed Project would result in cumulatively considerable significant impacts to the existing and planned roadway network by contributing traffic to facilities that would operate at deficient levels of service with or without the addition of Project traffic. Project traffic would make a cumulatively considerable contribution to identified cumulative impacts at seven (7) roadway segments and five (5) intersections in Opening Year Cumulative (2017) Conditions. With required payment of	**MM 4.4-1** In the event that the City of Perris establishes a fair-share funding program for improvements to the following intersections (or immediately adjacent roadways segments that contribute to the intersection's level of service), that applies to projects in the City of Moreno Valley, then prior to the issuance of a building permit for the project, the Project Applicant shall contribute a fair-share payment to the established funding program to address the Project's cumulative impacts to the following facilities:	Project Applicant/ Developer	City of Moreno Valley Public Works Department (Transportation Engineering Division)	Prior to the issuance of the first (1st) building permit	Significant Unavoidable Cumulative Impact (Near-Term)

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
City of Moreno Valley DIF fees and TUMF fees (see PR 4.4-3) and implementation of the DIF and TUMF-funded improvements at the cumulatively impacted facilities, all cumulatively impacted roadway segments and intersections in Opening Year Cumulative (2017) Conditions would be reduced to a less than significant impact with the exception of two (2) intersections: Western Way/Harley Knox Boulevard (Project's traffic contribution is 3.3%) and Indian Street/ Harley Knox Boulevard (Project's traffic contribution is 3.5%)). Although improvements are anticipated to relieve these deficiencies in the long-term along Harley Knox Boulevard, funded by the North Perris Road Bridge and Benefit District, there is no assurance that the improvements will be in place at the time of the proposed Project's Opening Year Cumulative (2017) Conditions. Thus, the cumulative impact is considered a near-term impact, until such time as the intersection improvements are in place.	a) Intersection of Western Way/ Harley Knox Boulevard (Project's fair-share contribution is 3.3%); b) Intersection of Indian Street/ Harley Knox Boulevard (Project's fair-share contribution is 3.5%)				
	MM 4.4-2 Prior to the issuance of occupancy permits, the Project shall construct roadway improvements (including but not limited to parkway, landscaping, and sidewalk improvements) along its frontage with Perris Boulevard and San Michele Road as specified in the City of Moreno Valley's Conditions of Approval for Plot Plan PA12-0023.	Project Applicant/ Project Construction Supervisor	City of Moreno Valley Land Development Division	Prior to the issuance of the first (1st) occupancy permit	N/A
	MM 4.4-3 Prior to the issuance of occupancy permits, the Project shall construct intersection improvements at each Project Driveway as specified in the City of Moreno Valley's Conditions of Approval for Plot Plan PA12-0023.	Project Applicant/ Project Construction Supervisor	City of Moreno Valley Land Development Division	Prior to the issuance of the first (1st) occupancy permit	N/A
	MM 4.4-4 MM 4.4-4 Prior to the issuance of building or occupancy permits, the Project shall comply with the City of Moreno Valley Development Impact Fee (DIF) program, which requires the payment of a fee to the City to reduce traffic congestion by participating in funding the installation of intersection improvements. Prior to the issuance of occupancy permits, the project also shall comply with the Transportation Uniform Mitigation Fee (TUMF) program, which funds off-site regional transportation improvements. The following study area intersection improvements are currently covered under DIF-funding and/or TUMF-funding: a) I-215 Southbound Ramps/ Harley Knox Boulevard (ID #1): One (1) southbound lane; one (1) westbound lane; and re-striping for one southbound lane and one southbound right turn. b) I-215 Northbound Ramps/ Harley Knox Boulevard (ID #2): One westbound free right lane, and re-striping for one (1) northbound right turn lane.	Project Applicant/ Project Construction Supervisor	City of Moreno Valley Land Development Division and Planning Division	Prior to the issuance of the first (1st) occupancy permit	N/A

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	c) Patterson Avenue/ Harley Knox Boulevard (ID #4): One (1) eastbound turn lane, and one (1) westbound turn lane. d) Indian Street/ Nandina Avenue (ID #5): One (1) northbound turn lane; one (1) southbound turn lane; one (1) southbound right turn lane; one (1) eastbound lane; and protected left-turn on eastbound and westbound approaches. e) Indian Street/ Harley Knox Boulevard (ID #6): Two (2) southbound right turn lanes with overlapping phasing; one (1) eastbound lane; one (1) eastbound turn lane; and remove cross-walk on north leg (westbound approach). f) Perris Boulevard/ San Michele Road (ID #12): One southbound turn lane.				
	MM 4.4-5 On-site direction signing and striping shall be installed in conjunction with detailed construction plans for the Project and as approved by the City of Moreno Valley. The on-site signing and striping plans shall be subject to review and approval by the Planning Division, and shall clearly indicate the location of service area docks and public parking areas.	Project Applicant/ Project Construction Supervisor	City of Moreno Valley Planning Division	Prior to the issuance of occupancy permit(s)	N/A
	MM 4.4-6 All final grading, landscaping, and street improvement plans shall provide sight distance standards in accordance with City of Moreno Valley and California Department of Transportation (Caltrans) standards, as appropriate.	Project Applicant/ Project Construction Supervisor	City of Moreno Valley Department of Public Works (Transportation Engineering Division), City of Moreno Valley Land Development Division and Planning Division	Prior to the issuance of building permit(s)	N/A
	MM 4.4-7 The minimum number of vehicle and bicycle parking spaces specified by the City of Moreno Valley Municipal Code shall be provided.	Project Applicant/ Project Construction Supervisor	City of Moreno Valley Planning Division	Prior to the issuance of occupancy permit(s)	N/A
	MM 4.4-8 A future transit stop will be provided by the Project on the southbound side of Perris Boulevard as specified in the City of Moreno Valley's Conditions of Approval for Plot Plan PA12-0023.	Project Applicant/ Project Construction Supervisor	City of Moreno Valley Department of Public Works (Transportation Engineering Division)	Prior to the issuance of the first (1st) occupancy permit	N/A

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
Threshold 2: The proposed Project would result in less than significant direct and cumulative impacts to CMP facilities.	Mitigation is not required	N/A	N/A	N/A	Less than Significant Impact
Threshold 3: There is no potential for the Project to change air traffic levels or create substantial air traffic safety risks.	Mitigation is not required.	N/A	N/A	N/A	No Impact
Threshold 4: No transportation safety hazards would be introduced as a result of the proposed Project's design.	Mitigation is not required.	N/A	N/A	N/A	No Impact
Threshold 5: Adequate emergency access would be provided to the Project site.	Mitigation is not required.	N/A	N/A	N/A	Less than Significant Impact
Threshold 6: The proposed Project is consistent with adopted policies and programs regarding public transit, bicycle, and pedestrian facilities. The Project is designed to reduce all potential transportation mode conflicts. Potential impacts to the performance or safety of transit, bicycle, and pedestrian systems would be less than significant.	Mitigation is not required.	N/A	N/A	N/A	Less than Significant Impact
4.5 Biological Resources					
Applicable Project Requirements					
	PR 4.5-1 The Project shall comply with City of Moreno Valley Municipal Code Title 3, Chapter 3.48, Western Riverside County Multiple Species Habitat Conservation Plan Fee Program, which requires a per-acre local development mitigation fee that will assist in providing revenue to acquire and preserve vegetation communities and natural areas within the city and western Riverside County which are known to support threatened, endangered or key sensitive populations of plant and wildlife species.	Project Applicant/ Developer	City of Moreno Valley Planning Division	Prior to the issuance of a building permit	N/A

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	PR 4.5-2 The Project shall comply with City of Moreno Valley Municipal Code Title 3, Chapter 8.60, Threatened and Endangered Species, which requires a per-acre local development mitigation fee pursuant to the City's adopted "The Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County, California" and as established pursuant to Fee Resolution 89-92.	Project Applicant/ Developer	City of Moreno Valley Planning Division	Prior to the issuance of grading permit(s)	N/A
Summary of Impacts					
Threshold 1: No sensitive vegetation communities are located on the Project site. A less than significant impact on sensitive plant species would occur because the loss of two individual smooth tarplant would not significantly impact the persistence of the species. The loss of habitat for the California horned lark is less than significant with mandatory MSHCP compliance because the species is a MSHCP Covered Species. Although the western burrowing owl is not present on the Project site, the species could be impacted if it migrates onto the property prior to the commencement of ground-disturbing construction activities, which is a potentially significant direct and cumulative impact.	**MM 4.5-1** Within 30 days prior to grading, a qualified biologist shall conduct a survey of the undeveloped portions of the property and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report and shall be submitted, reviewed, and accepted by the Planning Division prior to the issuance of a grading permit and subject to the following provisions: a) In the event that the pre-construction survey identifies no burrowing owls on the property, a grading permit may be issued without restriction. b) In the event that the pre-construction survey identifies the presence of at least one individual but less than three (3) mating pairs of burrowing owl, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.	Project Applicant/ Developer/Project Biologist	City of Moreno Valley Planning Division	Prior to the issuance of grading permit(s)	Significant Direct and Cumulative Impact Mitigated to Less than Significant

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	c) In the event that the pre-construction survey identifies the presence of three (3) or more mating pairs of burrowing owl, the requirements of MSCHP Species-Specific Conservation Objectives 5 for the burrowing owl shall be followed. Objective 5 states that if the site (including adjacent areas) supports three (3) or more pairs of burrowing owls and supports greater than 35 acres of suitable Habitat, at least 90 percent of the area with long-term conservation value and burrowing owl pairs will be conserved onsite until it is demonstrated that Objectives 1-4 have been met. A grading permit shall only be issued, either: • upon approval and implementation of a property-specific Determination of Biologically Superior Preservation (DBESP) report for the western burrowing owl by the CDFW. • a determination by the biologist that the site is part of an area supporting less than 35 acres of suitable Habitat, and upon passive or active relocation of the species following accepted CDFW protocols. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.				
	MM 4.5-2 If clearing activities are proposed	Project Applicant/	City of Moreno Valley	Prior to the issuance of	Significant Direct and

THRESHOLD	PROJECT REQUIREMENTS (PR) AND MITIGATION MEASURES (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	between February 1 and August 31, then within 30 days prior to vegetation clearing activities a qualified biologist shall conduct nesting bird surveys. If any nesting bird species are identified, then a construction buffer distance of 300 feet for non-listed, non-raptor species or 500 feet for listed and raptor species shall be maintained until the Project biologist certifies that the nests are no longer occupied.	Developer/Project Biologist	Planning Division	grading permit(s)	Cumulative Impact Mitigated to Less than Significant
Threshold 2: The Project site lacks riparian and other sensitive habitats; therefore, the Project would have no impact on riparian or other sensitive habitats as defined by the CDFW or USFWS.	Mitigation is not required	N/A	N/A	N/A	No Impact
Threshold 3: No federally protected wetlands are located on the Project site; therefore, no impact would occur.	Mitigation is not required	N/A	N/A	N/A	No Impact
Threshold 4: There is no potential for the Project to interfere with the movement of fish or impede the use of a native wildlife nursery site. Additionally, the Project would not have the ability to interfere with an established migratory wildlife corridor or result in wildlife movement impacts on the MSHCP Preserve.	Mitigation is not required	N/A	N/A	N/A	No Impact
Threshold 5: The Project would not conflict with any local policies or ordinances governing biological resources.	Mitigation is not required	N/A	N/A	N/A	No Impact
Threshold 6: The Project site is subject to the Western Riverside County MSHCP and its survey requirements for the western burrowing owl. Although compliant with all MSHCP provisions, and although the species is absent on the property, the property contains suitable habitat for the western burrowing owl. If the species is present on the property at the time a grading permit is issued, impacts would be significant, requiring mitigation.	Mitigation Measure 4.5-1 Applies	Project Applicant/ Developer/Project Biologist	City of Moreno Valley Planning Division	Prior to the issuance of grading permit(s)	Significant Direct and Cumulative Impact Mitigated to Less than Significant

1.0 INTRODUCTION

1.1 PURPOSES OF CEQA AND THIS EIR

As stated by CEQA Guidelines §15002, the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed [government actions (including the discretionary approval of development projects)];
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

If a project will be approved involving significant environmental effects,

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose.

This Environmental Impact Report (EIR, P12-064) is an informational document prepared by the City of Moreno Valley to evaluate the physical environmental effects that could be caused by constructing and operating the First Inland Logistics Center II Project (hereafter, the "Project"). The Project proposes governmental approval of Plot Plan PA12-0023 and other related discretionary and administrative actions that would be required to construct and operate the Project described in this EIR.

The Project is proposed on a 17.3-acre property located at the southwest corner of San Michele Road and North Perris Boulevard in the City of Moreno Valley, Riverside County, California. The City of Moreno Valley's Specific Plan 208, titled "Moreno Valley Industrial Area Plan" (MVIAP), designates the property for development as "Industrial." The southeastern corner of the property is located within an "Industrial Support Area" overlay that allows for commercial or industrial support land uses to be located within 300 feet of key roadway intersections, including the Nandina Avenue/ North Perris Boulevard intersection at the property's southeastern corner. The City of Moreno Valley's General Plan Land Use Map, which is intended to reflect the land use designations applied to the property by Specific Plan 208, designates the property for development with "Business Park/Light Industrial (BP)" land uses, with the southeastern corner of the property designated as "Commercial." The General Plan's commercial designation in the southeastern corner of the site is intended to correspond to the Specific Plan's "Industrial Support Area" overlay designation. Consistent with these land use designations, the property's zoning designation is "Industrial (I)."

The proposed Project is consistent with the property's land use designations as applied by the City of Moreno Valley General Plan and the Moreno Valley Industrial Area Plan (Specific Plan 208), as well as the property's zoning designation. CEQA Guidelines §15183(a) mandates that projects which are consistent with the development density established by existing zoning, community plan, or general

plan policies for which an EIR was certified, shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. In this case, the subject property was evaluated as part of an EIR certified in 1989 for Specific Plan 208 (State Clearinghouse Number 1988080813) and as part of the City's General Plan Program EIR certified in 2006 (State Clearinghouse Number 2000091075). Therefore, as mandated by CEQA Guidelines §15183(a), this EIR focuses on project-specific effects that are peculiar to the proposed First Inland Logistics Center II project and its 17.3-acre property.

An Initial Study was prepared by the City of Moreno Valley pursuant to CEQA Guidelines §15063 to determine if the Project could have a significant effect on the environment. The Initial Study determined that implementation of the Project has the potential to result in significant environmental effects, and a Project EIR, as defined by CEQA Guidelines §15161, is required. As stated in CEQA Guidelines §15161, a Project EIR 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."

Accordingly, and in conformance with CEQA Guidelines §15121(a), the purposes of this EIR are to: (1) disclose information by informing public agency decision makers and the public generally of the significant environmental effects associated with all phases of the Project, (2) identify possible ways to minimize or avoid those significant effects, and (3) to describe a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects.

1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

For purposes of this EIR, the term "Project" refers to the discretionary actions required to implement the First Inland Logistics Center II Project as proposed and all of the activities associated with its implementation, including planning, construction, and ongoing operation. In summary, the Project proposes the construction and operation of one warehouse distribution building with up to 400,130 square feet (s.f.) of interior building space, as well as surface parking areas and drive aisles, loading docks, roadway improvements, utility infrastructure, landscaping, water quality/detention basins, and other site improvements.

The Project proposes the following discretionary action, which is under consideration by the City of Moreno Valley:

- Plot Plan PA12-0023 provides a site arrangement, architectural plans, and landscape design for the building that is proposed to be constructed and operated on the Project site. A maximum of 400,130 s.f. of interior building space is proposed, consisting of 394,130 s.f. of warehouse space and 6,000 s.f. of office and mezzanine space.

Refer to EIR Section 3.0, *Project Description*, for a detailed description of the proposed Project, including a listing of permits and actions that would be required of the City of Moreno Valley as well as other agencies and authorities.

1.3 PROJECT HISTORY

The proposed Project site is located within the geographical limits of the Moreno Valley Industrial Area Plan (Specific Plan (SP) 208). SP 208 was originally referred to as the Oleander Specific Plan when first approved by the City in 1989, but was renamed as the Moreno Valley Industrial Area Plan in 2001 after 40 acres of additional area was added to the Specific Plan boundaries, bringing the total land area within SP 208 to 1,540 acres. SP 208 was again amended in 2002, which consolidated the Business Park, Mixed Use, Light Industry, and Heavy Industry land use designations of the original Specific Plan into a single "Industrial" land use classification in order to increase flexibility in accommodating economic development opportunities (SP 208, 2002). This Industrial classification is applied to the 17.3-acre First Inland Logistics Center II property, which is the subject of this EIR.

The Project site was the subject of previous environmental review under CEQA as part of an EIR certified in 1989 for SP 208 (State Clearinghouse Number 1988080813). In 2008, the City of Moreno Valley approved Tentative Parcel Map No. 35859 (PA07-0165) and two Plot Plans (PA07-0166 and PA07-0167) that covered the southern portion of the Project site in addition to additional land area located to the immediate west. For that project, the City prepared a Mitigated Negative Declaration (2008 MND) in compliance with CEQA (SCH No. 2008101041). The 2008 MND concluded that all significant environmental effects could be mitigated to below established thresholds of significance. That approved project consisted of a 700,000 s.f. warehouse building west of the currently proposed Project site and an 180,000 s.f. warehouse building on the southern portion of the currently proposed Project site.

In 2011, an Addendum to the 2008 MND was prepared, hereinafter referred to as Addendum No. 1. Addendum No. 1 addressed minor design modifications to the approved buildings, parking stalls, and driveways, as well as a proposal to construct an interim truck parking lot with 213 stalls on the southern portion of the currently proposed Project site (at the approximate location of the originally approved 180,000 s.f. building). That project was constructed and the southern portion of the currently proposed Project site is now developed as an interim truck parking lot, although the original approval of an 180,000 s.f. building remains valid and could be implemented in the future.

In 2012, the City of Moreno Valley approved a site plan (P12-061) to allow the expansion of the interim truck parking lot constructed on the southern portion of the Project site across the northern portion of the Project site. For this project, the City prepared a second Addendum to the 2008 MND, hereinafter referred to as Addendum No. 2. Addendum No. 2 addressed potential environmental effects associated with the expansion of the interim truck parking lot from approximately 8.5 acres to approximately 17.0 acres to accommodate a maximum of 487 truck parking stalls, a water quality basin, and screen walls along San Michele Road and Perris Boulevard. Addendum No. 2 concluded that expansion of the interim truck parking lot and associated improvements would not result in any new or more severe impacts than previously identified in the 2008 MND, and all potential environmental impacts would be adequately reduced to below established thresholds of significance with mandatory implementation of conditions of approval and the mitigation measures identified in the 2008 MND. The parking lot expansion has not yet been constructed and under existing conditions the northern portion of the Project site remains vacant.

1.4 LEGAL AUTHORITY

This EIR was prepared in accordance with all criteria, standards, and procedures of CEQA (California Public Resource Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq.).

Pursuant to CEQA §21067 and CEQA Guidelines Article 4 and §15367, the City of Moreno Valley is the Lead Agency under whose authority this EIR has been prepared. "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the Lead Agency and before taking action to approve the proposed Project, the City of Moreno Valley has the obligation to: (1) ensure that this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision making process; (3) make a statement that this EIR reflects the City of Moreno Valley's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (CEQA Guidelines §§15090 through 15093).

Pursuant to CEQA Guidelines §§15040 through 15043, and upon completion of the CEQA review process, the City of Moreno Valley will have the legal authority to do any of the following:

- Approve the proposed Project;
- Require feasible changes in any or all activities involved in the Project in order to substantially lessen or avoid significant effects on the environment;
- Disapprove the Project, if necessary, in order to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or
- Approve the Project even through the Project would cause a significant effect on the environment if the City makes a fully informed and publicly disclosed decision that: 1) there is no feasible way to lessen the effect or avoid the significant effect; and 2) expected benefits from the Project will outweigh significant environmental impacts of the Project.

This EIR fulfills the CEQA environmental review requirements for the proposed Plot Plan (PA12-0023) and all other governmental discretionary and administrative actions related to the Project.

This EIR is an informational document intended for use by the City of Moreno Valley decision makers, Trustee and Responsible agencies, and members of the general public in evaluating the physical environmental effects of the proposed Project. As mandated by CEQA Guidelines §15183(a), this EIR focuses on the specific environmental effects that are peculiar to the proposed Project and its property, because designation of the property for industrial/business park development was previously and adequately evaluated in accordance with CEQA by two prior EIRs (an EIR certified in 1989 for Specific Plan 208 (State Clearinghouse Number 1988080813) and the City's General Plan Program EIR certified in 2006 (State Clearinghouse Number 2000091075)). Additionally, physical impacts to the Project site were previously evaluated as part of the 2008 MND

and subsequent Addendum No. 1 and Addendum No. 2 (State Clearinghouse Number 1988080813). As such, those analyses do not need to be repeated and the 2008 MND and its Addenda are herein incorporated by reference and available for public inspection at the location specified in Section 7.0, References.

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

Section 21104 of the California Public Resource Code requires that all EIRs be reviewed by state responsible and trustee agencies (see also CEQA Guidelines §15082 and §15086(a)). As defined by CEQA Guidelines §15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A Trustee Agency is defined in CEQA Guidelines §15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

For the proposed Project, the Santa Ana Regional Water Quality Control Board (RWQCB) is identified as a Trustee Agency that is responsible for the protection of water resources and water quality. The RWQCB is responsible for issuance of a National Pollution Discharge Elimination System (NPDES) Permit to ensure that during and after construction, on-site water flows do not result in siltation, other erosional actions, or degradation of surface or subsurface water quality. There are no other agencies that are identified as Responsible or Trustee Agencies for the proposed Project.

1.6 EIR SCOPE, FORMAT, AND CONTENT

1.6.1 EIR SCOPE

As a first step in complying with the procedural requirements of CEQA, an Initial Study was prepared by the City of Moreno Valley to preliminarily identify the environmental issue areas that may be adversely impacted by the Project. Following completion of the Initial Study, the City filed a NOP with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The NOP was filed with the State Clearinghouse and distributed to Responsible Agencies, Trustee Agencies, and other interested parties on December 3, 2012, for a 30-day public review period. Because the review period extended over two federal holidays (December 25 and January 1), the response deadline was extended to January 14, 2013. The objective of distributing the NOP for public review was to solicit responses to assist the City in identifying the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR. Because the proposed Project does not meet the CEQA Guidelines §15206 definition of a project having statewide, regional, or areawide significance and does not meet the requirements of a project necessitating a scoping meeting as specified in CEQA Guidelines §15082(c), the City of Moreno Valley was not required to and did not hold a scoping meeting for this EIR.

As a result of the Initial Study and in consideration of all comments received by the City on the NOP, this EIR evaluates the Project's potential to cause adverse effects to the following environmental issue areas:

- Air Quality
- Greenhouse Gas Emissions
- Noise
- Transportation/Traffic
- Biological Resources

The Initial Study, NOP, public review distribution list, and written comments received by the City during the 30-day NOP public review period are provided in Technical Appendix A to this EIR. Substantive topics raised in response to the NOP are summarized below in Table 1-1, *Summary of NOP Comments*. The purpose of this table is to present the primary environmental issues of concern raised during the NOP review period. The table is not intended to list every comment received by the City during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this EIR.

Table 1-1 Summary of NOP Comments

COMMENTER	DATE	COMMENTS
CA Department of Transportation	December 10, 2012	– Prepare a traffic impact study that includes State highway facilities where the project adds 100 or more peak hour trips. – Clearly label the traffic analysis scenarios. – Indicate and exhibit LOS with and without improvements. – Eliminate or reduce impacts to the State highway system.
Native American Heritage Commission	December 19, 2013	– Identify and avoid or reduce any substantial adverse changes in the significance of an historical resource. – Consult with local Native American contacts.
South Coast Air Quality Management District	December 20, 2012	– Identify potential adverse air quality impacts and air pollutant sources. – Quantify $PM_{2.5}$ emissions. – Analyze regional and localized air quality impacts. – Perform a mobile health risk assessment. – Apply mitigation measures that go beyond what is required by law.
Johnson & Sedlack	January 7, 2013	– Evaluate impacts to Farmland of Local Importance. – Consider all feasible mitigation for air quality impacts. – Consider significant impacts to biological resources. – Consider impacts relative to glare. – Consider geological/soils impacts. – Consider individual and cumulative, local and regional impacts to area highways.

Table 1-1 Summary of NOP Comments

COMMENTER	DATE	COMMENTS
CA Department of Toxic Substances Control	January 8, 2013	– Identify if the project would pose a threat to human health or the environment. – Conduct an investigation for hazardous materials. – Properly dispose of any contaminated soils. – Manage hazardous wastes in accord with State law.
CA Department of Fish and Wildlife	January 14, 2013	– Identify impacts to sensitive flora and fauna and jurisdictional waters. – Discuss any inconsistencies with the MSHCP. – Discuss direct, indirect, and cumulative impacts to biological resources
City of Riverside	January 14, 2013	– Analyze and mitigate for spill-over traffic impacts in the City of Riverside. – Evaluate cumulative traffic impacts, considering other projects in the vicinity.
Sierra Club San Gorgonio Chapter	undated	– Analyze cumulative effects to traffic, air quality, and greenhouse gas. – Implement AQMD recommendations. – Evaluate impacts to biological and agricultural resources. – Include an analysis of hazards and hazardous materials.

In consideration of the comments received in response to the NOP, the City of Moreno Valley has identified one area of controversy. The SCAQMD suggests that mitigation measures be applied that go beyond what is required by law. The City of Moreno Valley applies mitigation measures which it determines to be feasible and practical for the Project Applicant to implement and the City of Moreno Valley to monitor and enforce. Although some of these measures may go beyond what the law requires, the imposed measures must have an essential nexus to the Project's impacts, be feasible to implement and enforce, be legal for the City to impose, and result in a benefit to the physical environment. Due to the non-attainment status of the South Coast Air Basin for the federal 8-hour ozone standard, there is controversy regarding the feasibility of applying mitigation measures for nitrogen oxide (NOx) mobile source emissions beyond those required by federal and state law on a project-by-project basis and the resultant benefits, if any, to regional air quality.

1.6.2 EIR FORMAT AND CONTENT

This EIR contains all of the information required to be included in an EIR as specified by the CEQA Statutes and Guidelines (California Public Resources Code, Section 21000 et. seq. and California Code of Regulations, Title 14, Chapter 5). CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-2, *Location of CEQA-Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.

Table 1-2 Location of CEQA-Required Topics

CEQA REQUIRED TOPIC	CEQA GUIDELINES REFERENCE	LOCATION IN THIS EIR
Table of Contents	§15122	Table of Contents
Summary	§15123	Section S.0
Project Description	§15124	Section 3.0
Environmental Setting	§15125	Section 2.0
Consideration and Discussion of Environmental Impacts	§15126	Section 4.0
Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented	§15126.2(b)	Section 4.0 & Subsection 5.1
Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented	§15126.2(c)	Subsection 5.2
Growth-Inducing Impact of the Proposed Project	§15126.2(d)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	§15126.4	Section 4.0 & Table S-1
Consideration and Discussion of Alternatives to the Proposed Project	§15126.6	Section 6.0
Effects Not Found to be Significant	§15128	Subsection 5.4
Organizations and Persons Consulted	§15129	Section 7.0 & Technical Appendices
Discussion of Cumulative Impacts	§15130	Section 4.0

In summary, the content and format of this EIR is as follows:

- **Executive Summary**, includes all of the summary requirements pursuant to CEQA Guidelines §15123.

- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the City of Moreno Valley, serving as the Lead Agency for this EIR.

- **Section 2.0, Environmental Setting**, describes the environmental setting, including descriptions of the Project site's physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the date this EIR's NOP was released for public review (December 3, 2012).

- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project,

- **Section 4.0, Environmental Analysis**, provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the proposed Project. A conclusion concerning significance is reached for each discussion and mitigation measures

are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as "effects" or "impacts" interchangeably. The CEQA Guidelines also identify the terms "effects" and "impacts" as being synonymous (CEQA Guidelines §15358). In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementation of the proposed Project.

The analyses are based in part upon technical reports that are appended to this EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would (without undue speculation) occur, feasible mitigation measures are recommended to reduce or avoid the significant effect. In most cases, implementation of the mitigation measures would reduce the adverse environmental impact to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a statement of overriding considerations would need to be adopted by the City of Moreno Valley pursuant to CEQA §15093.

- **Section 5.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project's significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the proposed Project. Section 5.0 also includes a discussion of the potential environmental effects that were found not be significant during this EIR's Initial Study and NOP process and that, therefore, do not require a detailed evaluation in this EIR.

- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. A range of four (4) alternatives is presented in Section 6.0.

- **Section 7.0, References**, cites all reference sources used in preparing this EIR and lists the agencies and persons that were consulted in preparing this EIR. Section 7.0 also lists the persons who authored or participated in preparing this EIR.

- **Technical Appendices**. CEQA Guidelines §15147 states that the "information contained in an EIR shall include summarized…information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public," and that the "placement of highly technical and specialized analysis and data in the body of an EIR shall be avoided." Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the City of Moreno Valley Community and Economic Development Department, Planning Division, 14177

Frederick Street, Moreno Valley, California, 92552, during the City's regular business hours or can be requested in electronic form by contacting the City Planning Division. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

A: Initial Study, Notice of Preparation, and Written Comments on the NOP
B: Air Quality Impact Analysis
C: Mobile Source Health Risk Assessment
D: Greenhouse Gas Analysis
E: Noise Study
F: Traffic Study
G: Biological Technical Report
G1: Protocol Burrowing Owl Survey
G2: Special Status Plant Species Survey Results
H: Geotechnical Report
I: Phase 1 Environmental Assessment

- **Documents Incorporated by Reference**. CEQA Guidelines §15150 allows for the incorporation "by reference all or portions of another document…[and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand." Documents, analyses, and reports that are incorporated into this EIR by reference are listed in Section 7.0, *References*, of this EIR. The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of an EIR. Where this EIR incorporates a document by reference, the document is identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.

2.0 ENVIRONMENTAL SETTING

2.1 REGIONAL SETTING AND LOCATION

The 17.3-acre Project site is located in the City of Moreno Valley, in western Riverside County, California. Western Riverside County abuts San Bernardino County to the northeast, Orange County to the west and San Diego County to the south. The site's location in a regional context is shown on Figure 3-1, *Regional Map*, in Section 3.0, *Project Description*.

Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square mile region comprising San Bernardino County, Riverside County, and the eastern tip of Los Angeles County. According to the Southern California Association of Governments (SCAG), this region is a fast-growing metropolitan area with large amounts of available land for future growth (SCAG, 2008a, 59-68). According to U.S Census data, the 2010 population of Riverside County was 2,189,641 (U.S. Census Bureau, 2011). SCAG forecast models predict that the population of Riverside County will grow to approximately 3.59 million persons (an approximate 1.4 million person increase) by the Year 2035 (SCAG, 2008b).

Unincorporated areas of Riverside County in the vicinity of the Project site include the unincorporated communities of Woodcrest and Mead Valley to the west and southwest, the unincorporated communities of Reche Canyon and Pigeon Pass to the north, and the unincorporated community of Lakeview and rugged terrain known as the "Badlands" to the east. The Project site is generally located to the north and northeast of the City of Perris and to the southeast of the City of Riverside. Additionally, the March Air Reserve Base (ARB) is located approximately 0.9-mile west of the site.

2.2 LOCAL SETTING AND LOCATION

The Project site is situated in the southern portion of the City of Moreno Valley. The property is rectangular-shaped and located immediately west of North Perris Boulevard, south of and adjacent to San Michele Road, approximately 1,150 feet east of Knox Street, and north of and adjacent to Nandina Avenue. Figure 3-2, *Vicinity Map*, in Section 3.0, *Project Description*, depicts the specific location of the Project site. The property encompasses Assessor Parcel Numbers (APNs) 316-200-001, 316-200-015, 316-200-019, 316-200-035, and a portion of APN 316-200-034. The Project site lies within Section 31 of Township 3 South, Range 3 West of the San Bernardino Base and Meridian.

Land within the southwestern portion of the City, including the Project site, is located with an area subject to the City's adopted Moreno Valley Industrial Area Plan (Specific Plan 208). Property in the Area Plan's boundaries was once rural in nature, but over the past decade has been transitioning into an important industrial and economic center for the City, as called for by the Area Plan. Several large-scale industrial and warehouse buildings have been developed and there are several approved development projects in this area that are pending construction. Subsection 2.3, below, describes the conditions surrounding the Project site in more detail.

2.3 SURROUNDING LAND USES AND DEVELOPMENT

As shown on Figure 2-1, *Surrounding Land Uses and Development*, the Project site is located in a portion of Moreno Valley that is developing as a center for distribution warehousing and light industrial land uses. Currently, the Project site is surrounded by a mixture of warehouse buildings, undeveloped lands, and other land uses located on properties designated and zoned for industrial development. Properties located north and south of Nandina Avenue and west of Perris Boulevard are developed or approved for development with distribution warehouse buildings. Lands located immediately south of Nandina Avenue across from the proposed Project site, in addition to lands located north of San Michele Road immediately across from the proposed Project site, are designated for industrial development pursuant to the City's General Plan and MVIAP, but are not yet entitled for development with specific projects.

Immediately abutting the proposed Project site on the west is property containing a warehouse building occupied by Harbor Freight Tools with associated parking areas and landscaping that was constructed pursuant to approved Plot Plan PA07-0166, beyond which is a warehouse distribution facility currently occupied by Modular Metal Fabrications, Inc. Lands located north of the site consist of undeveloped land, several existing non-conforming single-family residences, a automobile junk yard, and a large warehouse distribution facility currently occupied by O'Reilly Auto Parts. Land immediately east of the Project site includes undeveloped land and two warehouse distribution facilities currently occupied by El Dorado Stone and Walgreens. To the south of the proposed Project site are disturbed lands used for truck trailer parking and one non-conforming single-family residence, south of which is a warehouse distribution facility currently occupied by Harman Distribution Center.

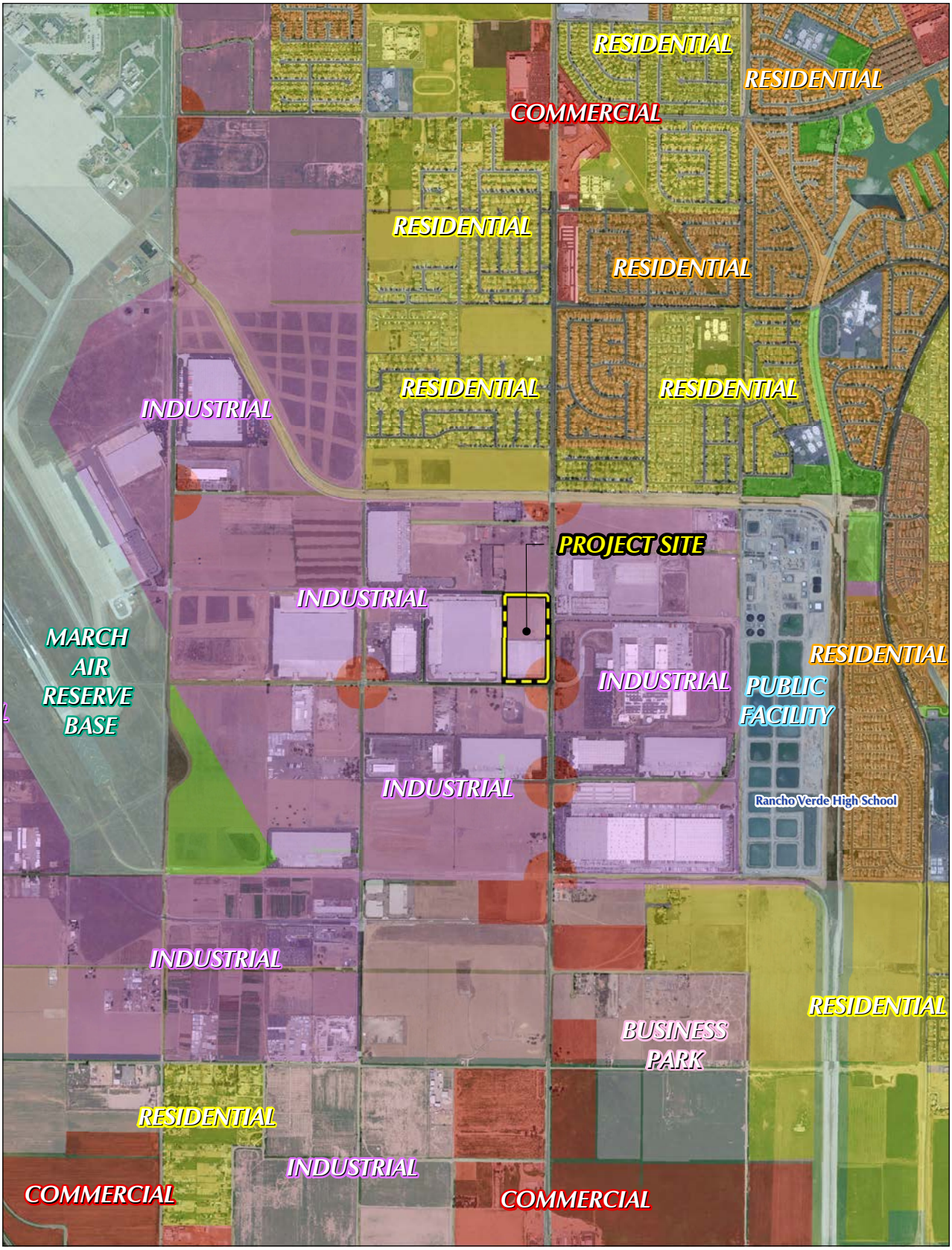
There is one school located within one (1) mile of the proposed Project site: El Potrero Elementary School, located approximately 0.7 mile northeast of the site. In addition, the March Air Reserve Base is located approximately 0.9 mile to the west

2.4 PLANNING CONTEXT

Provided in this subsection is a description of the Project site's land use designations, as applied by planning documents adopted by the City of Moreno Valley.

2.4.1 CITY OF MORENO VALLEY GENERAL PLAN

The City of Moreno Valley's prevailing planning document is its General Plan, dated July 11, 2006. As depicted on Figure 2-2, *Existing General Plan Land Use Designations*, the City's General Plan designates a majority of the Project site for Business Park/Light Industrial (BP) land uses. The southeast corner of the site is designated for Commercial (C) land uses. The Business Park/Light Industrial land use designation calls for employee intensive uses, including manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities, with a building intensity up to 1.0 floor area ratio (FAR). The Commercial land use designation calls for local retail and service commercial activities, with a building intensity up to 1.0 FAR.

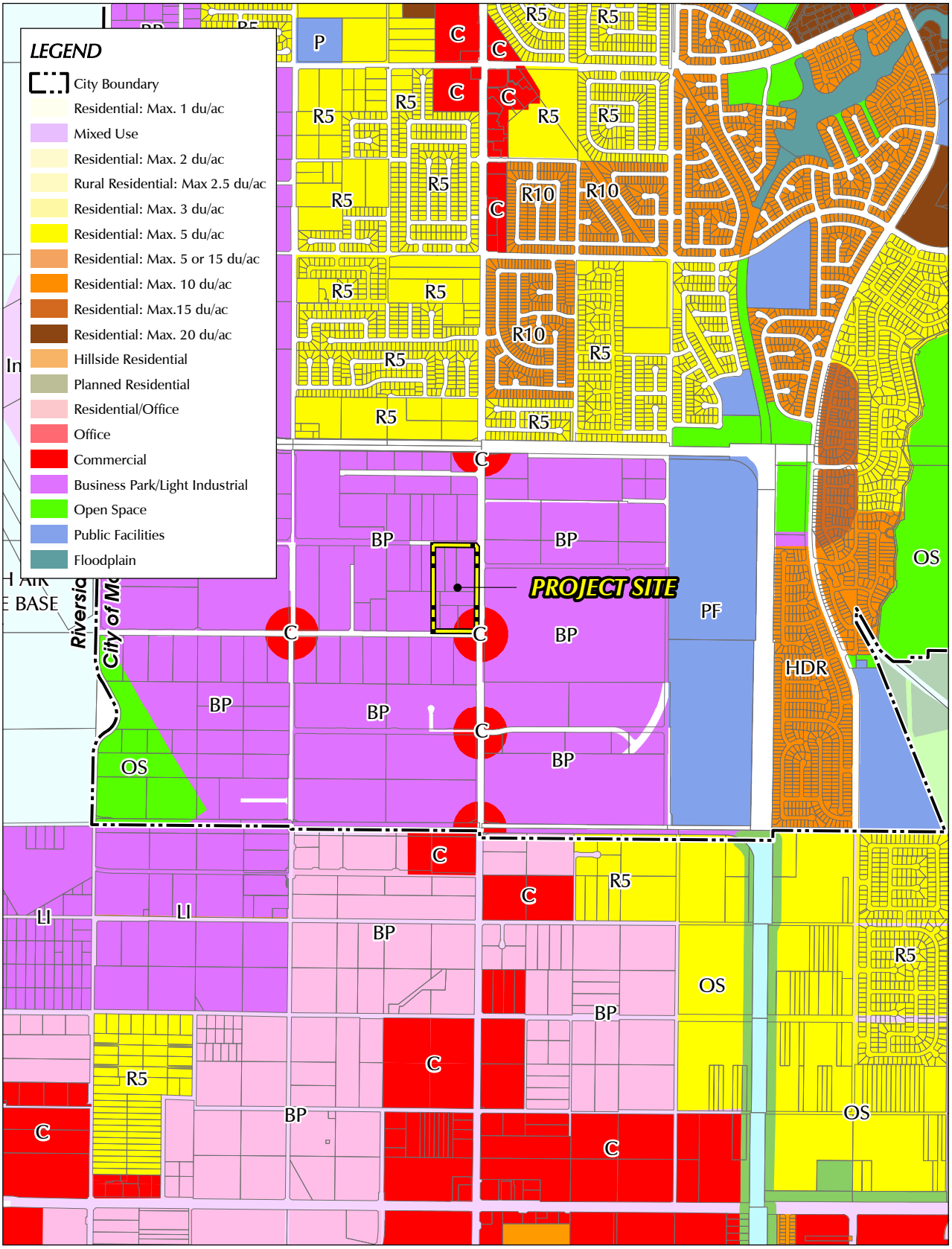


Source: RCTLMA (2012), Eagle Aerial (2008), Google Earth (2012), Cities of Moreno Valley & Perris

Figure 2-1

0 1,000 2,000 Feet

Surrounding Land Uses and Development



Source: RCTLMA (2012), City of Moreno Valley, City of Perris

Figure 2-2

0 1,000 2,000 Feet

Existing General Plan Land Use Designations

2.4.2 MORENO VALLEY INDUSTRIAL AREA PLAN (SPECIFIC PLAN 208)

The Project site is located within the geographic boundaries of the MVIAP (Specific Plan 208). The MVIAP document is herein incorporated by reference pursuant to CEQA Guidelines §15150 and is available for review at the physical location indicated in Subsection 7.2, *Documents Incorporated by Reference*. As stated in the Area Plan, the Moreno Valley Industrial Area Plan "establishes development regulations and design standards that will ensure quality development which will positively contribute to the City's industrial employment base…" (City of Moreno Valley, 2002 I-4). The Moreno Valley Industrial Area Plan designates a majority of the subject property for Industrial land uses. The southeastern corner of the site is designated as an Industrial Support Area (see Figure 2-3, *Moreno Valley Industrial Area Plan Map*). The Industrial designation provides for a wide range of industrial land uses, while the Industrial Support Area provides for services to support industrial services without affecting the integrity of lands available for industrial uses.

2.4.3 ZONING

The development regulations and design standards specified in the MVIAP (Specific Plan 208) supersede the zoning standards contained in the City of Moreno Valley's Municipal Code. The Area Plan applies the "Industrial (I)" zoning designation to the proposed Project site, which permits a wide range of industrial and industrial/business related support uses.

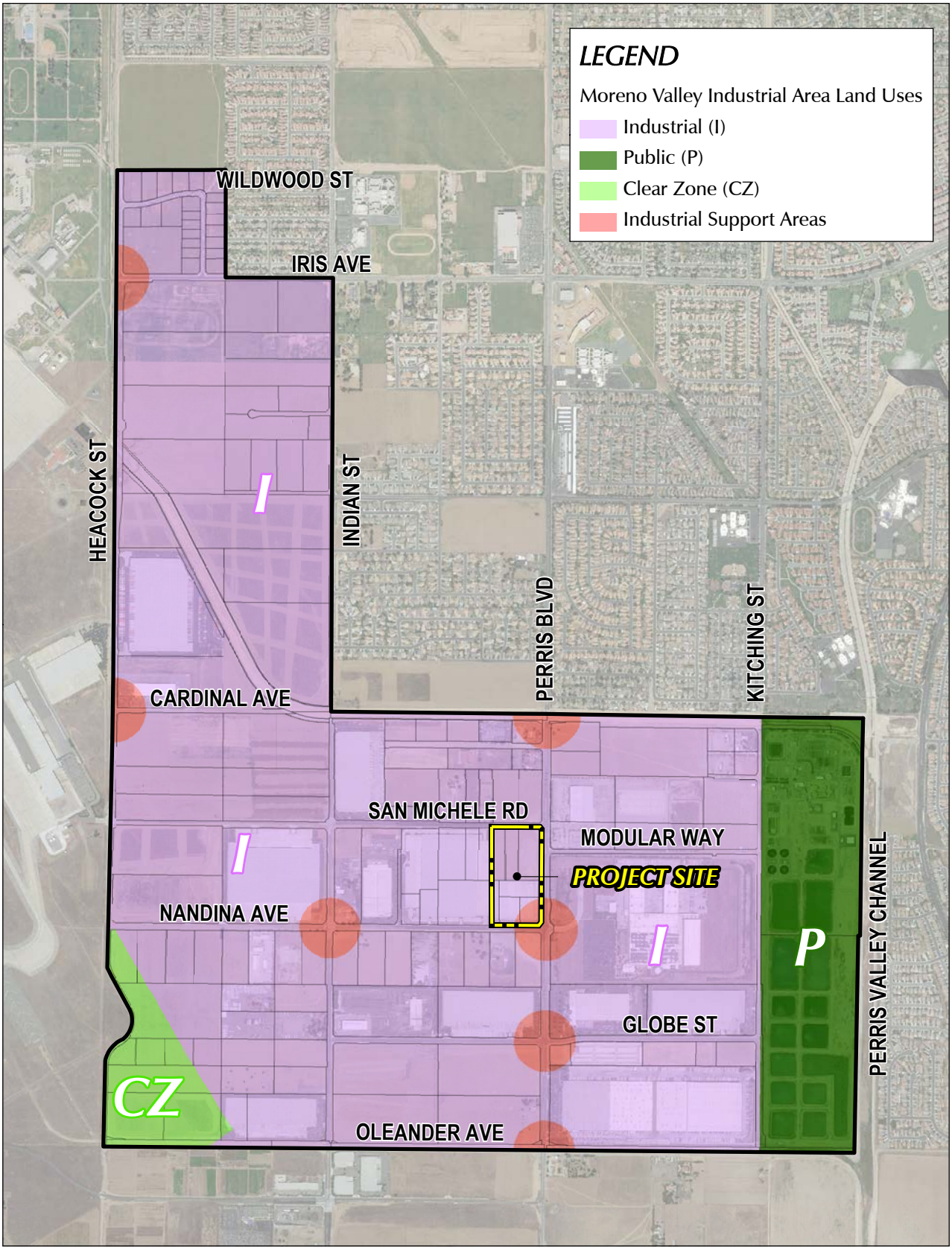
2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to CEQA Guidelines §15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was released for public review on December 3, 2012, and the following subsections provide a description of the Project site's physical environmental condition as of that approximate date. More information regarding the Project site's environmental setting as related to the environmental topics evaluated in this EIR is provided in the various subsections of Section 4.0, *Environmental Analysis*.

2.5.1 LAND USE

The area surrounding the Project site, as described previously in Subsection 2.3, is characterized by a mixture of undeveloped lands, warehouse buildings, and other land uses located on properties designated and zoned for industrial development by the City of Moreno Valley. The Project site is not used for agricultural production and is not located in an agricultural area. There are no Williamson Act Contract lands or Agricultural Preserves located on the site or in the immediately surrounding area.

As shown on Figure 2-4, *Aerial Photograph*, the northern half of the site (approximately 8.9 acres) is undeveloped and is routinely maintained (e.g., disced) to remove vegetation that may pose a wildland fire hazard. The southern half of the site (approximately 8.4 acres) is developed as a parking lot that is used for truck trailer parking, with a driveway access provided from Nandina Avenue and landscaping provided along Nandina Avenue and Perris Boulevard. Additional landscaping is provided at the boundary between the existing parking lot in the south and the undeveloped portion of the site in the north. There are no unique land uses or aesthetic features present on the property.



Source: RCTLMA (2012), Eagle Aerial (2008), Google Earth (2012), Moreno Valley Industrial Area Plan

Figure 2-3

0 1,000 2,000 Feet

Moreno Valley Industrial Area Plan Map

Source: RCTLMA (2012), Eagle Aerial (2008), Google Earth (2012)

Figure 2-4

0 0.25 0.5 Miles

Aerial Photograph

2.5.2 AIR QUALITY AND CLIMATE

The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. As documented in the Project's air quality report (*Technical Appendix B* to this EIR), although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 47°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year.

The SCAB is currently not in attainment of state and/or federal standards established for Ozone (O3) one-hour and eight-hour, particulate matter (PM_{10} and $PM_{2.5}$), and Nitrogen Oxides (NO_X), and also not in attainment for Lead (Pb) in Los Angeles County (CARB, 2011). The South Coast Air Quality Management District (SCAQMD) conducts in-depth analyses of the toxic air contaminants and their resulting health risks for all of Southern California. This study, entitled, *Multiple Air Toxics Exposure Study in the South Coast Air Basin, MATES III*, predicted an excess cancer risk of 566 in one million for the vicinity of the Project site.

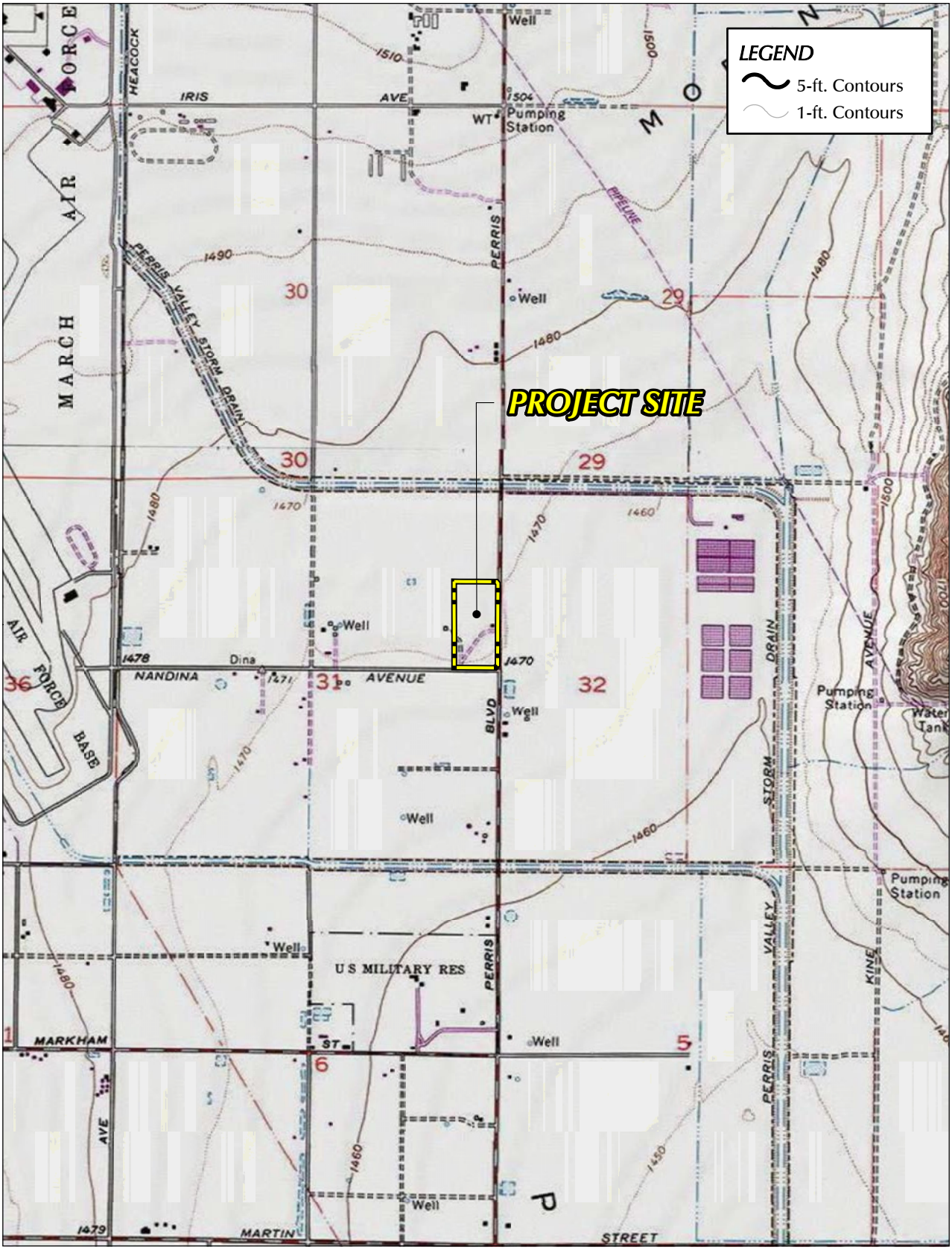
Refer to Subsection 4.1, *Air Quality*, and Subsection 4.3 *Greenhouse Gas Emissions*, for a more thorough discussion of the Project's site existing air quality and climate setting.

2.5.3 TOPOGRAPHY, GEOLOGY, AND SOILS

The proposed Project site consists of flat land. On-site elevations ranging from 1,474 feet above mean sea level (amsl) in the northwest corner to 1471 feet amsl in the southeastern corner. Figure 2-5, *Topographic Map*, depicts the Project site's existing topographic conditions. Based on prior geological investigations of the Project site that supported a prior 2008 MND and MND Addenda (SCH No. 1988080813), the property's earth materials consist of native alluvial soils extending from the ground surface to depths exceeding 25 feet, and consist of silty sands, sands, sandy silts, clayey sands, clayey silts and sandy clays. Based on information available from Eastern Municipal Water District's (EMWD's) West San Jacinto Groundwater Basin Management Plan 2010 Annual Report, groundwater is known to occur at depths of approximately 75 feet below the existing ground surface (EMWD 2011 21). The Project site is not located within an active Alquist-Priolo earthquake zone or a City-designated fault hazard zone, meaning that no active faults are mapped or known to exist on the Project site or in the immediate surrounding area. The nearest known active fault is the San Jacinto Valley section of the San Jacinto Fault zone located approximately 7.5 miles east of the Project site.

2.5.4 HYDROLOGY

The Project site is located in the Santa Ana River watershed, which drains a 2,650 square-mile area and is the principal surface flow water body within the region (SAWPA, 2010 Ch. 3). The San Jacinto River drains the area in the vicinity of the Project site. It starts in the San Jacinto Mountains



Source: RCTLMA (2012), USGS

Figure 2-5

Topographic Map

(approximately 30 miles southeast of the proposed Project site), runs westerly and discharges into Lake Elsinore. In wet years, the San Jacinto River will overflow the lake and connect with the Santa Ana River through the Temescal Wash (SAWPA, 2010 Ch. 3). Under existing conditions, two (2) water quality/detention basins are located on the southern portion of the Project site, located at the property's southwestern corner and parallel to the site's frontage with Nandina Avenue. These basins were constructed as part of approved Parcel Map No. 35859 (PA07-0165) and facilitate drainage flow from the southern portion of the property to the City's storm drain system.

2.5.5 BIOLOGICAL RESOURCES

The Project site contains few biological resources. The southern portion of the property is developed as a truck parking lot and the northern portion of the property is disturbed and regularly disced for fire fuel management. Regionally, the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP) focusing on the conservation of sensitive plant and animal species and their associated habitats in western Riverside County. The City of Moreno Valley approved the MSHCP on January 13, 2004. The MSHCP identifies a Criteria Area, in which habitat conservation efforts are targeted. The Project site is not located with the Criteria Area. As such, the site is not targeted for open space conservation as part of the regional plan for habitat conservation (Riverside County, 2003c, Vol. 1 Ch. 3).

2.5.6 CULTURAL RESOURCES

The Project site contains no historic resources, no known cultural or paleontological resources, and has a low potential for the discovery of subsurface resources. According to Figure 5.10-3 of the Moreno Valley General Plan Final EIR, mountainous areas in the eastern portion of the City, known as the Badlands, have the greatest potential for encountering paleontological resources in Moreno Valley (City of Moreno Valley, 2006b). The Project site is not located in close proximity to the Badlands. From an archaeological perspective, Moreno Valley is located in the traditional tribal use areas of Native American Tribes, particularly the Luiseno and Cahuilla Indians. Although no archaeological resources are known to be present on the Project site and have a low potential for being discovered beneath the surface of the site, subsurface resources still have the potential to exist.

2.5.7 TRANSPORTATION

Interstate 215 (I-215), Interstate 15 (I-15), State Route 60 (SR-60) and State Route 91 (SR-91) are major vehicular travel routes in the region of the Project site. The Project site is located approximately 1.9 miles east of I-215, easterly of the Harley Knox Boulevard interchange. From the Harley Knox Boulevard interchange, I-215 connects with I-15 approximately 24 roadway miles to the south and connects with SR-60 approximately 6.0 roadway miles to the north.

The Project site is located immediately south of San Michele Road, west of Perris Boulevard, north of Nandina Avenue, and approximately 1,150 feet east of Knox Street. Existing traffic on nearby roadways consists of both passenger vehicles and trucks accessing the existing industrial/warehouse developments in the area. The City of Moreno Valley's designated truck route includes Cactus Avenue, Frederick Street, Heacock Street, San Michele Road, Nandina Avenue, and Indian Street south of San Michele Road.

Regarding other forms of transportation, field observations indicated that there is nominal pedestrian and bicycle activity in the area (refer to *Technical Appendix F*). The Riverside Transit Agency (RTA) operates bus services along Perris Boulevard via Route 19. There is currently no commuter rail service in the City of Moreno Valley, but a route is planned along the west side of I-215 called the Perris Valley Line, with a planned station at Alessandro Boulevard, approximately 7.0 roadway miles from the Project site (RCTC, n.d.). Approximately 0.9 mile west of the Project site is the March ARB/Inland Port Airport (IPA), at which the airport is used by military and government aircraft with limited use by civilian aircraft. Although air cargo service was discontinued in 2008, the March ARB/IPA Joint Land Use Study (March JPA, 2010 Ch. 2), discloses the potential for increased general aviation use.

Refer to Subsection 4.4, *Transportation/Traffic*, for a more thorough discussion of the Project's site existing transportation setting.

2.5.8 NOISE

Primary sources of noise in the Project vicinity include vehicle noise, aircraft noise, and noise from construction and operational activities associated with development. To determine the existing acoustical setting, 24-hour noise measurements were taken in the Project study area by Urban Crossroads, Inc. at five (5) locations on October 25, 2012. Measured hourly noise levels ranged from 53.5 to 66.9 decibels (dBA Leq), resulting in Community Noise Equivalent Levels (CNELs) ranging from 61.4 CNEL to 66.9 CNEL (refer to *Technical Appendix E*).

Refer to Subsection 4.3, *Noise*, for a more thorough discussion of the Project's site existing noise setting.

2.5.9 UTILITIES AND SERVICE SYSTEMS

The Project site is located in the service area of Eastern Municipal Water District (EMWD) for domestic water and sewer service. EMWD manages the domestic water supply and delivery service within its 555 square mile service area, including the City of Moreno Valley, all or portions of six other cities, and a portion of unincorporated Riverside County. As documented in EMWD's 2010 Urban Water Management Plan, EMWD has four sources of water supply: imported water from the Metropolitan Water District (MWD), recycled water, local groundwater production, and desalted groundwater (EMWD, 2011 Ch. 3). EMWD has an adopted Water Shortage Contingency Plan (EMWD Ordinance 117.2) that applies regulations and restrictions on the delivery of and consumption of water during water shortages. Regarding sewer collection and treatment, EMWD collects and treats all of the wastewater collected in its service area to tertiary standards. Treated wastewater is disposed of by means of customer sales, discharge to Temescal Creek, and through percolation and evaporation while stored in EMWD ponds (EMWD, 2011, Ch. 3). Solid waste collection and disposal in the Project area is conducted by Waste Management of the Inland Empire, a division of Waste Management, Inc. Landfills that have the potential of receiving solid waste from the Project site include the El Sobrante Landfill, the Badlands Sanitary Landfill, and the Lamb Canyon Sanitary Landfill.

3.0 PROJECT DESCRIPTION

This section provides all of the information required by CEQA Guidelines §15124, including: a description of the Project's precise location and boundaries; a statement of the Project's objectives; a description of the Project's technical, economic, and environmental characteristics; and a description of the intended uses of this EIR including a list of government agencies that are expected to use this EIR in their decision-making processes, a list of the permits and approvals that are required to implement the Project, and a list of related environmental review and consultation requirements.

Under existing conditions, the 17.3-acre Project site contains an 8.3-acre trailer parking yard and 9.0 acres of disturbed, undeveloped land that is approved for development as a parking lot which has not yet been constructed. The proposed Project involves demolition and removal of the existing trailer yard, grading of the 17.3-acre property, and construction and operation of a warehouse building containing 400,130 square feet (s.f.) of interior building space. Associated improvements to the property include, but are not limited to loading docks, surface parking areas, drive aisles, utility infrastructure, landscaping, exterior lighting, signage, and water quality/detention basins.

This EIR (P12-064) analyzes the physical environmental effects associated with all components of the Project, including planning, construction, and operation. Approval of a Plot Plan (PA12-0023) is requested of the City of Moreno Valley to implement the proposed Project. No other discretionary actions are required on the part of the City to approve the Project; nonetheless, this EIR covers any and all other discretionary and administrative approvals that may be required of the City of Moreno Valley or other governmental agencies to fully implement the proposed Project.

3.1 PROJECT LOCATION

The Project site consists of 17.3 acres in the southern portion of the City of Moreno Valley, Riverside County, California (see Figure 3-1, *Regional Map*). From a regional perspective, the Project site is located north of the City of Perris, southeast of the City of Riverside, and south, east, and west of unincorporated areas in Riverside County. Interstate 215 (I-215) is located approximately 1.85 miles to the west of the site and State Route 60 (SR-60) is located approximately 4.85 miles to the north of the site. At the local scale, the Project site is situated south of San Michele Road, north of Nandina Avenue, west of Perris Boulevard, and about 1,150 feet east of Knox Street, as illustrated on Figure 3-2, *Vicinity Map*, and Figure 3-3, *USGS Topographic Map*. Refer to EIR Section 2.0 for more information about the Project site's regional and local setting.

3.2 STATEMENT OF OBJECTIVES

The primary objective of the proposed Project is to construct and operate a logistics center warehouse building in the City of Moreno Valley on a property designated for industrial development by the Moreno Valley Industrial Area Plan (Specific Plan 208.) The following is a list of specific objectives sought by the proposed Project.

A. To construct and operate a logistics center warehouse building in the City of Moreno Valley on a property designated for industrial development by the City of Moreno Valley General Plan and the Moreno Valley Industrial Area Plan (Specific Plan 208.)

B. To develop a logistics center warehouse building that is feasible to construct and operate and that appeals to light industrial and warehouse distribution tenants seeking to locate in the Moreno Valley area.

C. To make efficient use of property designated for industrial development by developing a logistics center warehouse building on a property that is adjacent to existing warehouse development and that achieves a minimum floor area ratio (FAR) of 0.5.

D. To construct and operate a logistics center warehouse building within five miles of major regional transportation corridors.

E. To attract new businesses and jobs to the City of Moreno Valley, thereby providing a more equal jobs/housing balance both in the city and in Riverside County and reducing the need for members of the existing local workforce to commute outside the area for employment.

3.3 PROPOSED PLOT PLAN PA12-0023

The Project involves the construction and operation of one warehouse building containing 400,130 s.f. of interior floor space. The only discretionary action required to be approved by the City of Moreno Valley is Plot Plan PA12-0023. Other discretionary and administrative actions that would or could be necessary to implement the proposed Project are listed in Table 3-1, *Matrix of Project Approvals/Permits*. A detailed description of the proposed Project is provided in the following subsections.

Table 3-1 Matrix of Project Approvals/Permits

PUBLIC AGENCY	APPROVALS AND DECISIONS
City of Moreno Valley	
Proposed Project – City of Moreno Valley Discretionary Approvals	
City of Moreno Valley Planning Commission	• Approve, conditionally approve, or deny PA12-0023. • Reject or certify this EIR along with appropriate CEQA Findings (P12-064).
Subsequent City of Moreno Valley Discretionary and Ministerial Approvals	
City of Moreno Valley Subsequent Implementing Approvals	• Approve Final Maps, parcel mergers, lot line adjustments, or parcel consolidations, as may be appropriate. • Approve Conditional or Temporary Use Permits, if required. • Issue Grading Permits. • Issue Building Permits. • Approve Road Improvement Plans. • Issue Encroachment Permits. • Accept public right-of-way dedications.
Other Agencies – Subsequent Approvals and Permits	
Riverside County Flood Control and Water Conservation District	• Approvals for drainage infrastructure.
Eastern Municipal Water District	• Approvals for water and sewer infrastructure.
Santa Ana Regional Water Quality Control Board	• Issuance of a Construction Activity General Construction Permit. • Issuance of a National Pollution Discharge Elimination

PUBLIC AGENCY	APPROVALS AND DECISIONS
	System (NPDES) Permit.

3.3.2 GENERAL DESCRIPTION OF PLOT PLAN PA12-0023

As shown on Figure 3-4, *Plot Plan PA12-0023*, the Project Applicant proposes to construct and operate a new logistics center warehouse building on a 17.3-acre property in accordance with the "Industrial" land use designation applied the property by the Moreno Valley Industrial Area Plan (MVIAP). Although the MVIAP designates an "Industrial Support Area" overlay on the southeastern corner of the site, which allows industrial support uses to occur within 300 feet of the Perris Boulevard/Nandina Avenue intersection, the Project Applicant has elected not to include industrial support uses as part of the proposed Project.

The proposed building is designed to contain 400,130 s.f. of interior floor space consisting of 394,130 s.f. of warehouse space and 6,000 s.f. of office and mezzanine space. As shown on Figure 3-5, *Plot Plan PA12-0023 Detail*, the front door and office would be positioned at the southeast corner of the building, facing the intersection of Perris Boulevard/Nandina Avenue. A total of 59 loading bays are planned for loading, unloading, and short-term parking of truck trailers. On the 17.3 acre property, 0.3 acres would be dedicated to the City of Moreno Valley for the widening of San Michele Road, so the total net parcel acreage is 17.0 acres. Over the 17.0 net acre parcel, the proposed building calculates to a floor area ratio (FAR) of 0.51.

The proposed Plot Plan also depicts the number and location of proposed driveway entrances and passenger car and trailer parking spaces. The Plot Plan specifies 159 passenger car parking spaces (including six (6) spaces accessible to persons with disabilities) and 63 spaces for trailer parking. The trailer parking spaces and the building's dock doors are proposed to have restricted access by automatic gates. Bicycle parking also would be provided on the property in compliance with the City of Moreno Valley Municipal Code Section 9.11. Two (2) driveway entrances would occur at San Michele Road and two (2) driveway entrances would occur at Nandina Avenue.

3.3.3 ARCHITECTURE

Figure 3-6, *Architectural Elevations*, depicts conceptual architectural elevations for the proposed building. The structure would be 40 feet tall, although architectural projections may exceed 40 feet. Exterior materials include concrete tilt-up panels and glass windows with blue reflective glazing. The color palette for the exterior building façades includes shades of white and gray. The building interior is designed to provide a main warehouse floor, office space, and mezzanine. Although the building has the potential to be divided for multiple tenant use, it is designed for a single user/ occupant (Cochran, 2012a).

3.3.4 CONCEPTUAL LANDSCAPE PLAN

A conceptual landscape plan accompanies the proposed Plot Plan application and is depicted on Figure 3-7, *Conceptual Landscaping Plan*. The landscape plan indicates that trees, shrubs, and groundcovers are proposed to be planted along the property's street frontages at Nandina Avenue, Perris Boulevard, and San Michele Road, at building entries and driveways, in and around proposed detention/water quality basins, around the perimeter of the building except for the west-facing façade where the loading bay doors would occur, and in the passenger car parking areas.

Proposed landscaping would be ornamental in nature, except within detention basins where plant materials would be selected to serve water quality functions. Prior to the issuance of a building permit, the Project Applicant would be required to submit specific planting and irrigation plans to the City of Moreno Valley for review and approval. The plans would be required to comply with Chapter 9.17 of the City of Moreno Valley Municipal Code, which establishes requirements for landscape design, automatic irrigation system design, and water-use efficiency.

3.3.5 INFRASTRUCTURE IMPROVEMENTS

A. Public Roadway Improvements

The existing public street network servicing and abutting the Project site consists of San Michele Road to the north, Perris Boulevard to the east, and Nandina Avenue to the south. Public roadway dedications and improvements that are proposed as part of the Plot Plan are described below.

- **Perris Boulevard**. Perris Boulevard is a north-south oriented roadway located along the Project site's eastern boundary. The proposed Project would install curb, gutter, and sidewalk improvements along its frontage as specified by the final conditions of approval for the proposed Project and applicable City of Moreno Valley standards. The Project also would provide space for a transit stop along its Perris Boulevard frontage for the construction of a turnout for mass transit vehicles.

- **San Michele Road**. San Michele Road is an east-west oriented roadway located along the northern boundary of the Project site. As part of the proposed Project, 0.3 acres of land would be conveyed to the City of Moreno Valley to widen the San Michele Road public right-of-way along the northern Project frontage. The proposed Project would improve San Michele Road along the property's frontage by adding curb, gutter, sidewalk, and pavement as will be required by the final conditions of approval for the proposed Project and applicable City of Moreno Valley standards.

A complete description of other Project-required transportation improvements is provided in EIR Subsection 4.4, *Transportation and Traffic*.

B. Water and Wastewater Conveyance Facilities

Water and wastewater service is provided to the Project site by Eastern Municipal Water District (EMWD). All proposed water and sewer facilities are required to be designed in accordance with EMWD standards and would require review and approval by EMWD prior to their installation. The locations of proposed fire hydrants also require review and approval by the Moreno Valley Fire Department prior to installation.

❑ <u>Water Service</u>

Fire and domestic service connections have already been provided to the site during the construction of the warehouse building located to the immediate west. Water service is available to the Project site under existing conditions via EMWD's existing 12" line located beneath Nandina Avenue. As part of the proposed Project, subsurface water lines would be installed on the property to connect

with the existing system. Also, a pump house is proposed to be constructed on the site associated with the Project's fire protection system. No water line installations are proposed beyond the boundaries of the Project site.

❑ Wastewater Service

Wastewater service is available to the Project site under existing conditions via EMWD's existing 15" sewer main located beneath Nandina Avenue. A 6" lateral has already been provided to the Project site during construction of the warehouse building to the immediate west. As part of the proposed Project, subsurface conveyance lines would be installed on the property to connect with the existing system. No wastewater line installations are proposed beyond the boundaries of the Project site.

C. Drainage

Under existing conditions, two (2) water quality/detention basins are located on the southern portion of the Project site, located at the property's southwestern corner and parallel to the site's frontage with Nandina Avenue. These basins were constructed as part of approved Parcel Map No. 35859 (PA07-0165) to facilitate drainage flow from the southern portion of the property to the City's storm drain system. As part of the proposed Project, the existing basins would be modified to accommodate some additional runoff area as a new basin would be installed along Perris Boulevard.

D. Earthwork and Grading

Earthwork and grading would occur on the 17.3-acre Project site and no area of the site would be left undisturbed. According to the Plot Plan, earthwork and grading activities would result in approximately 13,300 cubic yards of cut and 42,000 cubic yards of fill. Depths of grading would extend from approximately 2.0 to 5.0 feet in depth, except in the areas of proposed detention basins that would be excavated to depths of approximately 4.0 to 5.0 feet. Import of between 28,000 and 30,000 cubic yards of earth materials is anticipated. Although the location of the borrow site is not known at this time, this EIR assumes that the borrow site will be located in close proximity to the Project site and have all necessary governmental approvals for disturbance (Cochran, 2012a). The Project site is relatively flat and proposed grading would not create manufactured slopes except around the proposed detention/water quality basins. As shown on the Plot Plan, manufactured slopes that would be created around the on-site basins would be up to approximately 4.0 feet in height with a maximum gradient of 2:1.

E. Construction Characteristics

The proposed Project would be constructed over the course of approximately eight (8) months. First, demolition of the existing parking lot would occur. It is expected that approximately 12,800 cubic yards of demolition debris would be generated, which would be processed and reused during Project construction (Webb, 2012). After demolition, the 17.3 acre parcel would be graded, the underground utility system would be installed and fine grading would occur. Next, surface materials would be poured and the building would be erected, connected to the underground utility system, and painted. Lastly, landscaping and fencing/walls would be installed. The approximate construction schedule provided by the Project Applicant is as follows (Cochran, 2012a).

- Demolition: 2 weeks

- Grading and subsurface improvements: 3 weeks
- Utility installation, building construction: 6 months
- Landscaping and fencing/wall installation: 1 month

Construction equipment is expected to operate on the Project site eight (8) hours per day, five (5) days per week. The types and numbers of heavy equipment expected to be used during construction activities are listed in the air quality technical report attached to this EIR as *Technical Appendix B*. For purposes of evaluation in this EIR, it is assumed that the new building would be operational in late 2013.

F. Operational Characteristics

At the time this EIR was prepared, the future tenant of the proposed building was unknown. For the purpose of analysis in this document, the future uses on site are assumed to be any of those uses permitted by the Moreno Valley Industrial Area Plan's "Industrial" designation and the City of Moreno Valley Municipal Code. Furthermore, this EIR assumes the proposed building would be operational 24 hours per day. The Project Applicant estimates that the building would likely be used as a warehouse for dry goods storage (Cochran, 2012a). The building is not designed to accommodate tenants that require warehouse refrigeration. Business operations would be conducted within enclosed buildings, with the exception of traffic movement, parking, and the loading and unloading of trucks at designated loading bays.

Because the building tenant is not yet known, the number of jobs that the Project would generate cannot be precisely determined; therefore, for purposes of analysis within this EIR, employment estimates are calculated using average employment density factors reported by the Southern California Association of Governments in their publication "Employment Density Study Report," (SCAG 2001). This publication reports that for every one (1) acre of warehouse land use in Riverside County, the median number of jobs supported is 11.69 (SCAG 2001, Table 9A). Thus, the proposed Project's 17.0 net acres is expected to support approximately 191 jobs. (Refer to EIR Subsection 5.3, *Growth-Inducing Impacts*, for more information about the Project's employment estimate calculations.).

3.4 STANDARD REQUIREMENTS AND CONDITIONS OF APPROVAL

The proposed Plot Plan PA12-0023 and its technical aspects were reviewed in detail by various City of Moreno Valley departments and divisions. These departments and divisions are responsible for reviewing land use applications for compliance with City codes and regulations. They also were responsible for reviewing this EIR (P12-064) for technical accuracy and compliance with CEQA. The City of Moreno Valley departments and divisions responsible for technical review include:

- Community & Economic Development Department, Building and Safety Division
- Community & Economic Development Department, Land Development Division
- Community & Economic Development Department, Planning Division
- Public Works Department, Transportation Engineering Division
- Public Works Department, Special Districts Division
- Fire Prevention Bureau
- Moreno Valley Utility

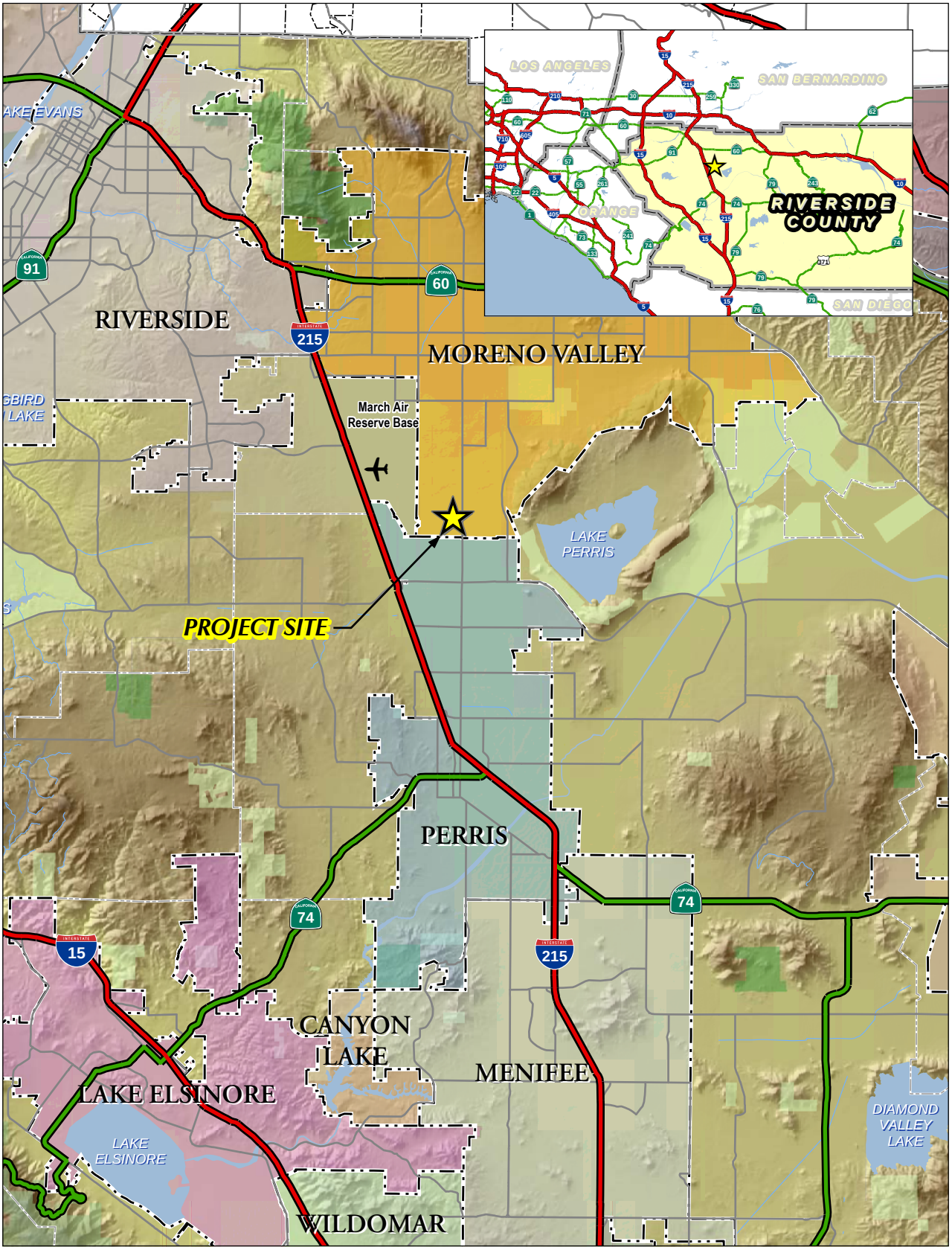
Review of proposed Plot Plan PA12-0023 by the City departments and divisions listed above will result in the production of a comprehensive set of draft Conditions of Approval that will be available for public review prior to consideration of the proposed Project by the Moreno Valley Planning Commission. These conditions will be considered by the Planning Commission in conjunction with their consideration of PA12-0023. If approved, the Project will be required to comply with all imposed Conditions of Approval.

Conditions of Approval and other applicable regulations, codes, and requirements to which the Project is required to comply and that result in the reduction or avoidance of an environmental impact are specified in each subsection of EIR Section 4.0, Environmental Analysis. These are referred to as "Project Requirements" throughout this EIR.

3.5 SUMMARY OF REQUESTED ACTIONS

The City of Moreno Valley has primary approval responsibility for the proposed Project. As such, the City serves as the Lead Agency for this EIR pursuant to CEQA Guidelines §15050. The role of the Lead Agency was previously described in detail in Subsection 1.4 of this EIR). The City Planning Commission will consider the proposed Plot Plan for approval, approval with changes, or denial. The Planning Commission's decision is final unless appealed to the City Council. The City will consider the information contained in this EIR and this EIR's Administrative Record in its decision-making processes. Upon approval of the Project and certification of this EIR, the City would conduct administrative reviews and grant ministerial permits and approvals to implement Project requirements and conditions of approval. A list of the primary actions under City jurisdiction is provided in Table 3-1, *Matrix of Project Approvals/Permits*.

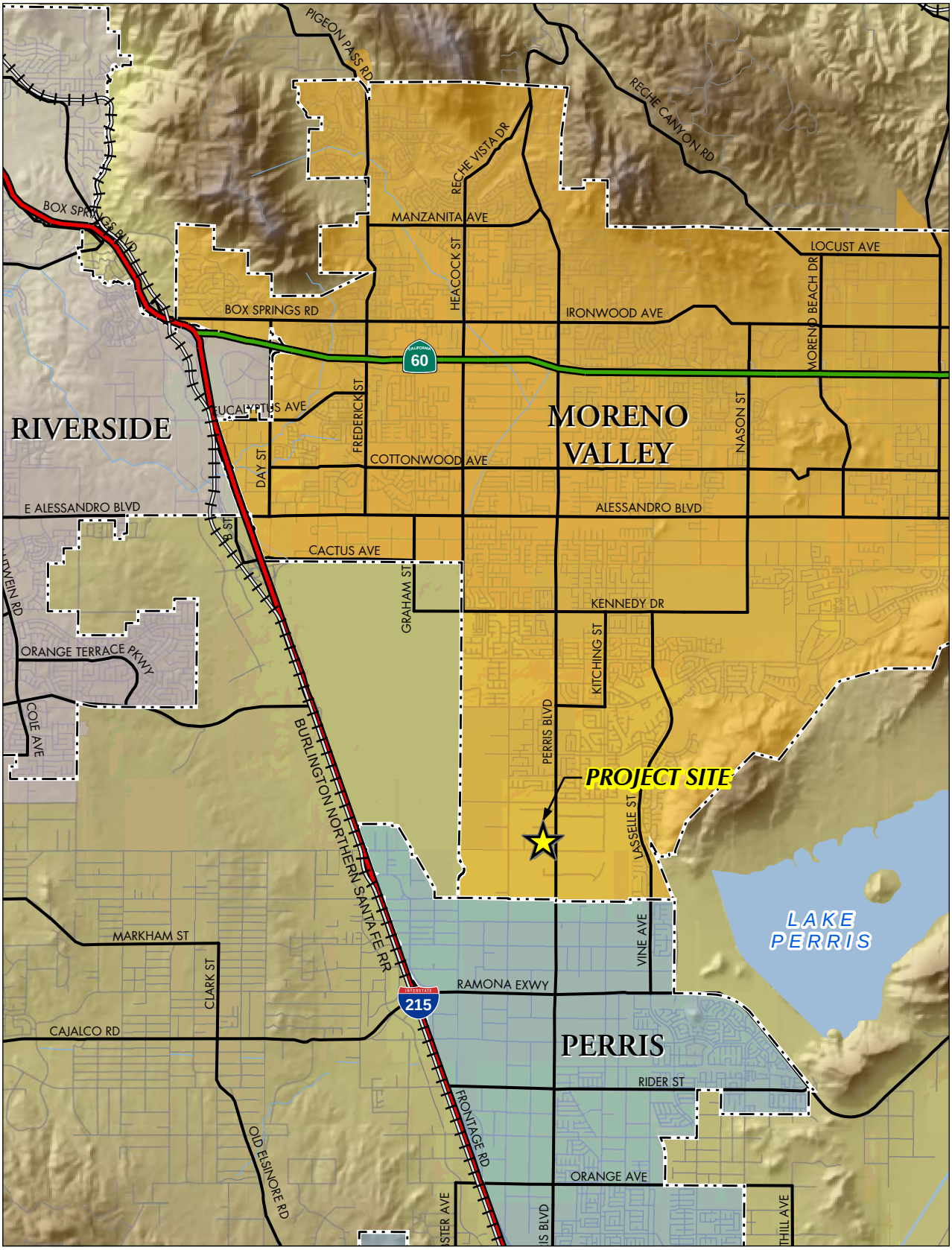
Also provided in Table 3-1 is a list of other authorities that are expected to use this EIR and a summary of the subsequent actions associated with the Project. This EIR covers all federal, state, local government and quasi-government approvals that may be needed to construct or implement the Project, whether or not they are explicitly listed in Table 3-1 or elsewhere in this EIR (CEQA Guidelines Section 15124(d)).



Source: RCTLMA (2012)

Figure 3-1

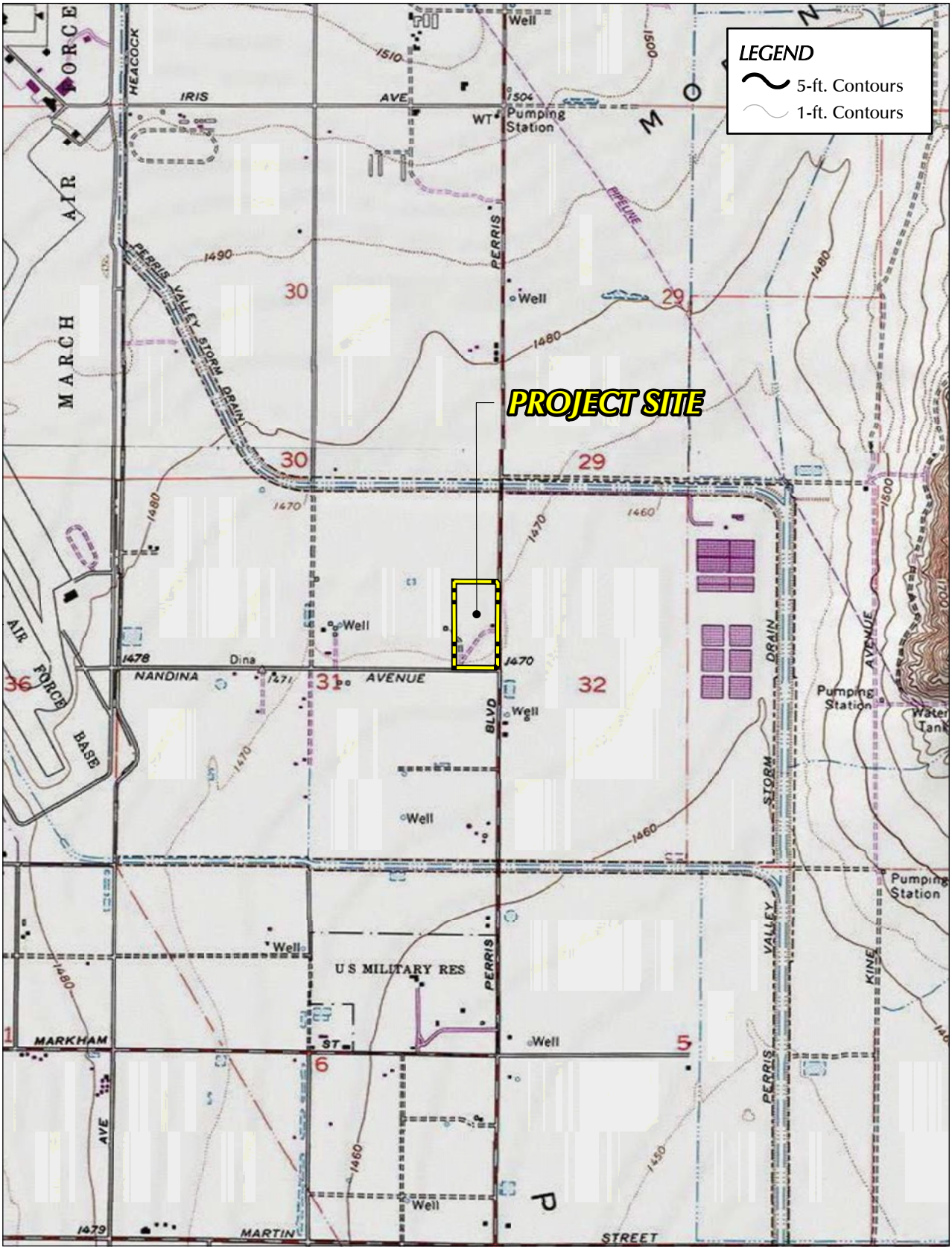
Regional Map



Source: RCTLMA (2012)

Figure 3-2

Vicinity Map

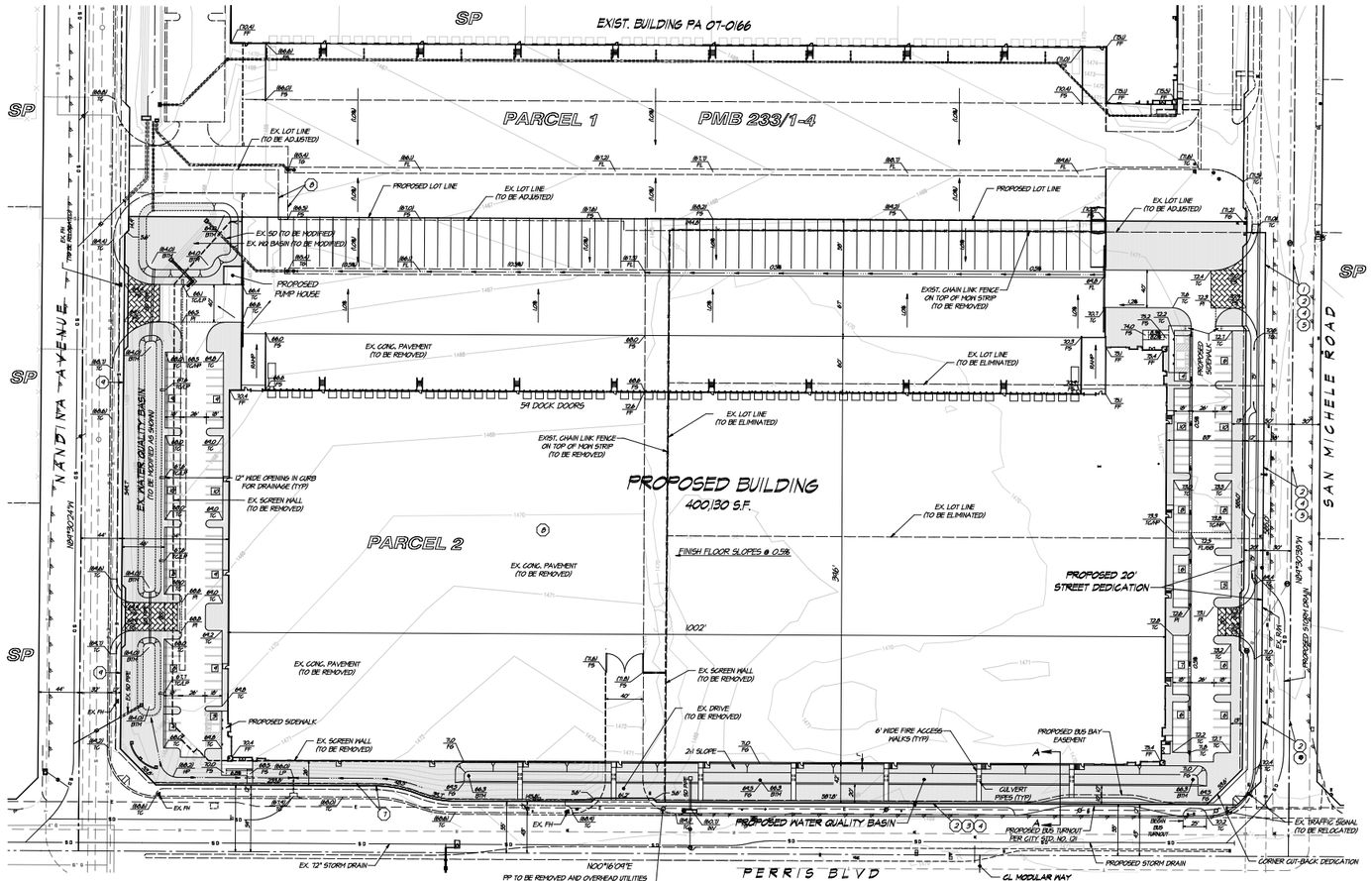


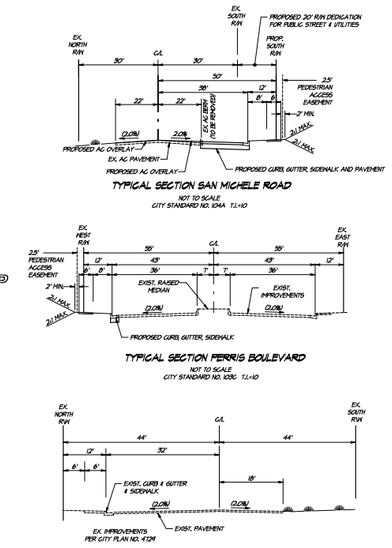
Source: RCTLMA (2012), USGS

Figure 3-3

0 1,000 2,000 Feet

USGS Topographic Map





OWNER:
FIRST INDUSTRIAL, LP
ATTN: LARRY GOCHRIN
848 N. SEPULVEDA BOULEVARD, SUITE 750
EL SEGUNDO, CA 90245
TEL: (310) 414-5400
FAX: (310) 414-5462

APPLICANT:
FIRST INDUSTRIAL REALTY TRUST
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ENGINEER:
ALBERT A. WEBB ASSOCIATES
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3788 MCCRAY STREET
RIVERSIDE, CA 92506
TEL: (951) 686-1070
FAX: (951) 788-1256

ARCHITECT:
HILL+PARTNERS ARCHITECTS, INC.
ATTN: HOND JAHS
18818 BARDEEN AVE, SUITE #100
IRVINE, CA 92612
TEL: (949) 863-1770
FAX: (949) 863-0851

LAND USE / ZONING:

EXISTING LAND USE:	VACANT
PROPOSED LAND USE:	INDUSTRIAL
EXISTING ZONING:	INDUSTRIAL SP 10(B)
PROPOSED ZONING:	INDUSTRIAL SP 10(B)

SCHOOL DISTRICT:
VAL VERDE UNIFIED SCHOOL DISTRICT

TOPOGRAPHY:
FIELD SURVEY BY: ALBERT A. WEBB ASSOCIATES
APRIL 2012

ACREAGE:
11.3 AC. GROSS (TO EX. ROW)
-0.3 AC. ROAD DEDICATIONS (SAN MICHELE ROAD)

11.0 AC. NET (TO PROP. ROW)

A.P.N.:
316-200-001, 316-200-013,
316-200-014, 316-200-015 &
PORTION OF 316-200-034

PRELIMINARY EARTHWORK
CUT= 25,500 CUBIC YARDS
FILL= 42,000 CUBIC YARDS
28,500 CUBIC YARDS (IMPORT)

SETBACKS:

MINIMUM SITE AREA	3 AC
MINIMUM SITE WIDTH	300'
MINIMUM SITE DEPTH	150'
MINIMUM SETBACKS:	
PERRIS BOULEVARD	20'
NANDINA AVENUE	15'
SAN MICHELE ROAD	15'

EASEMENT NOTES:

1. AN EASEMENT FOR EITHER OR BOTH POLE LINES, CONDUITS OR UNDERGROUND FACILITIES AND INCIDENTAL PURPOSES, RECORDED JUNE 16, 1921 IN BOOK 726 OF DEEDS, PAGE 25.
2. AN EASEMENT SHOWN OR DEDICATED ON THE MAP OF PARCEL MAP NO. 12361 ON FILE IN BOOK 36, PAGE 84, OF PARCEL MAPS, FOR: PUBLIC USE FOR STREET AND PUBLIC UTILITY AND INCIDENTAL PURPOSES.
3. ABUTTER'S RIGHT OF INGRESS AND EGRESS TO OR FROM PERRIS BOULEVARD AS SUCH EXCEPT THE GENERAL EASEMENT OF TRAVEL, HAVE BEEN DEDICATED OR RELINQUISHED ON THE MAP OF PARCEL MAP NO. 12361 ON FILE IN BOOK 36, PAGE 84, OF PARCEL MAPS.
4. AN EASEMENT FOR EITHER OR BOTH POLE LINES, CONDUITS OR UNDERGROUND FACILITIES AND INCIDENTAL PURPOSES, RECORDED FEBRUARY 21, 1974 AS INSTRUMENT NO. 25256 OF OFFICIAL RECORDS.
5. AN EASEMENT SHOWN OR DEDICATED ON THE MAP OF PARCEL MAP NO. 17644 ON FILE IN BOOK 101, PAGE 39, OF PARCEL MAPS, FOR: PUBLIC USE FOR STREET AND PUBLIC UTILITY AND INCIDENTAL PURPOSES.

   THE EFFECT OF A RESOLUTION, ON SAID MAP, BY THE RIVERSIDE COUNTY BOARD OF SUPERVISORS ACCEPTING SAID OFFER OF DEDICATION FOR THE PURPOSES OF VESTING TITLE IN THE COUNTY OF RIVERSIDE ON BEHALF OF THE PUBLIC, BUT NOT AS PART OF THE COUNTY MAINTAINED ROAD SYSTEM.
6. THE FACT THAT THE LAND LIES WITHIN THE BOUNDARIES OF THE MARCH AIR FORCE BASE DEVELOPMENT PROJECT AREA, AS DISCLOSED BY THE DOCUMENT RECORDED JUNE 11, 2001 AS INSTRUMENT NO. 2001-238080 OF OFFICIAL RECORDS.
7. 2.5' PEDESTRIAN ACCESS EASEMENT TO THE CITY OF MORENO VALLEY DEDICATED ON THE MAP OF PARCEL MAP NO. 35894 ON FILE IN BOOK 233, PAGE 1, OF PARCEL MAPS.
8. ACCESS EASEMENT FOR THE BENFIT OF PARCEL 1 RESERVED ON THE MAP OF PARCEL MAP NO. 35894 ON FILE IN BOOK 233, PAGE 1, OF PARCEL MAPS.
9. ABUTTER'S RIGHTS OF VEHICULAR AND PEDESTRIAN ACCESS RELEASED AND RELINQUISHED ON THE MAP OF PARCEL MAP NO. 35894 ON FILE IN BOOK 233, PAGE 1, OF PARCEL MAPS.

SITE TABULATION:

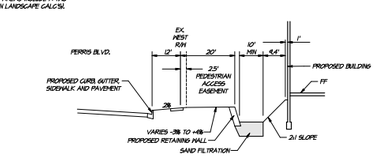
	TOTAL
PROPOSED PARCEL NET AREA	479,850 SF (11.0 AC)
OFFICE/MEZZANINE= TYPE-III-N (OCC.B)	6,000 SF
WAREHOUSE= TYPE-III-N (OCC.S-1)	394,130 SF
TOTAL BUILDING AREA	400,130 SF
LOT COVERAGE	34.1%
LANDSCAPING REQUIRED (10%)	73,985 SF
LANDSCAPING PROVIDED	47,550 SF
LANDSCAPE COVERAGE	13.2%
OFFICE PARKING (1/500) 0 - 20,000 SF @ 1/250 SF	24 STALLS
WAREHOUSE PARKING (1/1000) 0 - 20,000 SF @ 1/1,000 SF 20,001 - 40,000 SF @ 1/2,000 SF OVER 40,001 SF @ 1/4,000 SF	20 STALLS 10 STALLS 88 STALLS
TOTAL REQUIRED PARKING	142 STALLS
HANDICAP PARKING REQUIRED	6 STALLS
AUTO PARKING PROVIDED: STANDARD PER PROP. PLAN COMPACT PER PROP. PLAN HANDICAP	158 STALLS< 0 STALLS (0%) 6 STALLS
TOTAL PARKING	164 STALLS
TRAILER PARKING PROVIDED	63 STALLS
LOADING BAYS	54 BAYS

NOTES:

1. 2008 THOMAS BROS. MAP-PAGE 747, GRID E6
2. THIS AREA IS NOT SUBJECT TO GEOLOGIC HAZARDS WITHIN A SPECIAL STUDIES ZONE, BUT IS SUBJECT TO LOW LIQUIFACTION
3. FEMA COMMUNITY PANEL NO. 06065F-0020-B ZONE X.
4. CONTOUR INTERVAL, ONE FOOT.
5. THIS AREA IS WITHIN THE MORENO VALLEY INDUSTRIAL SPECIFIC PLAN 10(B).
6. THIS PROJECT IS WITHIN CITY OF MORENO VALLEY COMMUNITY SERVICES DISTRICT NO. 1
7. ALL GATES ARE AT LEAST 24' IN WIDTH, AUTOMATIC WITH THE KNOX RAPID ENTRY SYSTEM.
8. DRIVEWAYS ARE PER CITY STANDARD PLAN NO. 110C.
9. ALL TRASH ENCLOSURES SHALL BE DUAL BIN (TRASH/RECYCLE) PER CITY STD. PLAN 621.
10. DECORATIVE PAVING SHALL BE USED AT ALL NON-DOCK ENTRANCES.
11. CURB AND GUTTER TO BE NOTCHED 12" WIDE (MINIMUM) WHERE NOTED.
12. ALL PARKING STALLS ABUTTING LANDSCAPED AREAS INCLUDE A TWO (2) FOOT OVERHANG AREA (NOT INCLUDED IN LANDSCAPE CALCS).

LEGEND:

PROPOSED LANDSCAPING
ENHANCED ENTRY PAVEMENT
DI DROP INLET
EX. EXISTING
FF FINISH FLOOR
FL FLOW LINE
FG FINISH GRADE
FH FIRE HYDRANT
FS FINISH SURFACE
GB GRADE BREAK
HP HIGH POINT
INV INVERT
LP LOW POINT
PP POWER POLE
R/W RIGHT-OF-WAY
SD STORM DRAIN
TB TOP BERM
TC TOP OF CURB
TG TOP OF GRATE
TYP TYPICAL
INGRESS AND EGRESS
SLOPE SYMBOL
ADA PATH OF TRAVEL
FIRE LANE
HANDICAPPED PARKING
BOUNDARY LINE
PROPOSED R/W
EXISTING R/W
EXISTING LOT LINE
RIBBON GUTTER
FLOW ARROW
EXISTING FENCE
EXISTING WATER LINE
EXISTING SEWER LINE
EXISTING GAS LINE
PROPOSED SET BACK LINE



PROJECT DESCRIPTION:

THIS PROJECT PROPOSES A 400,130 SF WAREHOUSE BUILDING ON 11.7 ACRES, CONSISTING OF 391,250 S.F. WAREHOUSE, 8,000 S.F. OFFICE/MEZZANINE. IT REPLACES THE EXISTING TRAILER PARKING APPROVED UNDER PA 07-0166. THE PROJECT PROPOSES 54 LOADING DOCKS, 2 TRASH COMPACTORS, SURFACE PARKING AREAS AND DRIVE SLIP ROADWAY IMPROVEMENTS, UTILITY INFRASTRUCTURE, LANDSCAPING, WATER QUALITY BASINS AND OTHER SITE IMPROVEMENTS. THIS PROJECT PROPOSES TO MODIFY THE EXISTING WESTERLY PROPERTY LINE AND MERGE 4 EXISTING PARCELS AS WELL AS VACATE RESTRICTED ACCESS ALONG NANDINA AVENUE TO ALLOW FOR 2 PROPOSED DRIVEWAYS.

LEGAL DESCRIPTION:

PORTIONS OF PARCEL 1 AND PARCEL 2 OF PARCEL MAP NO. 35894 AS SHOWN BY MAP ON FILE IN BOOK 233 OF PARCEL MAPS AT PAGES 1 THROUGH 4 AND PARCEL 3 AND PARCEL 4 OF PARCEL MAP NO. 17644 AS SHOWN BY MAP ON FILE IN BOOK 101 AT PAGE 39 AND PARCEL 4 OF PARCEL MAP NO. 12361 AS SHOWN BY MAP ON FILE IN BOOK 36 AT PAGE 84, ALL RECORDS OF RIVERSIDE COUNTY, CA.

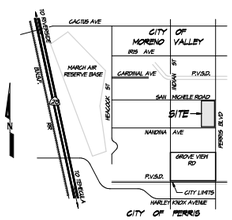
UTILITIES:

WATER & SEWER
EASTERN MUNICIPAL WATER DISTRICT
P.O. BOX 8300
PERRIS, CA 92572
PH. (951) 928-4107
ATTN: JOHN FOSTER

GAS
SOUTHERN CALIFORNIA GAS COMPANY
1981 N. LOGAN AVE.
REDLANDS, CA 92373
PH: (909) 335-3928

ELECTRIC
MORENO VALLEY UTILITIES
14205 FREDRICK STREET
SUITE 4
MORENO VALLEY, CA 92553

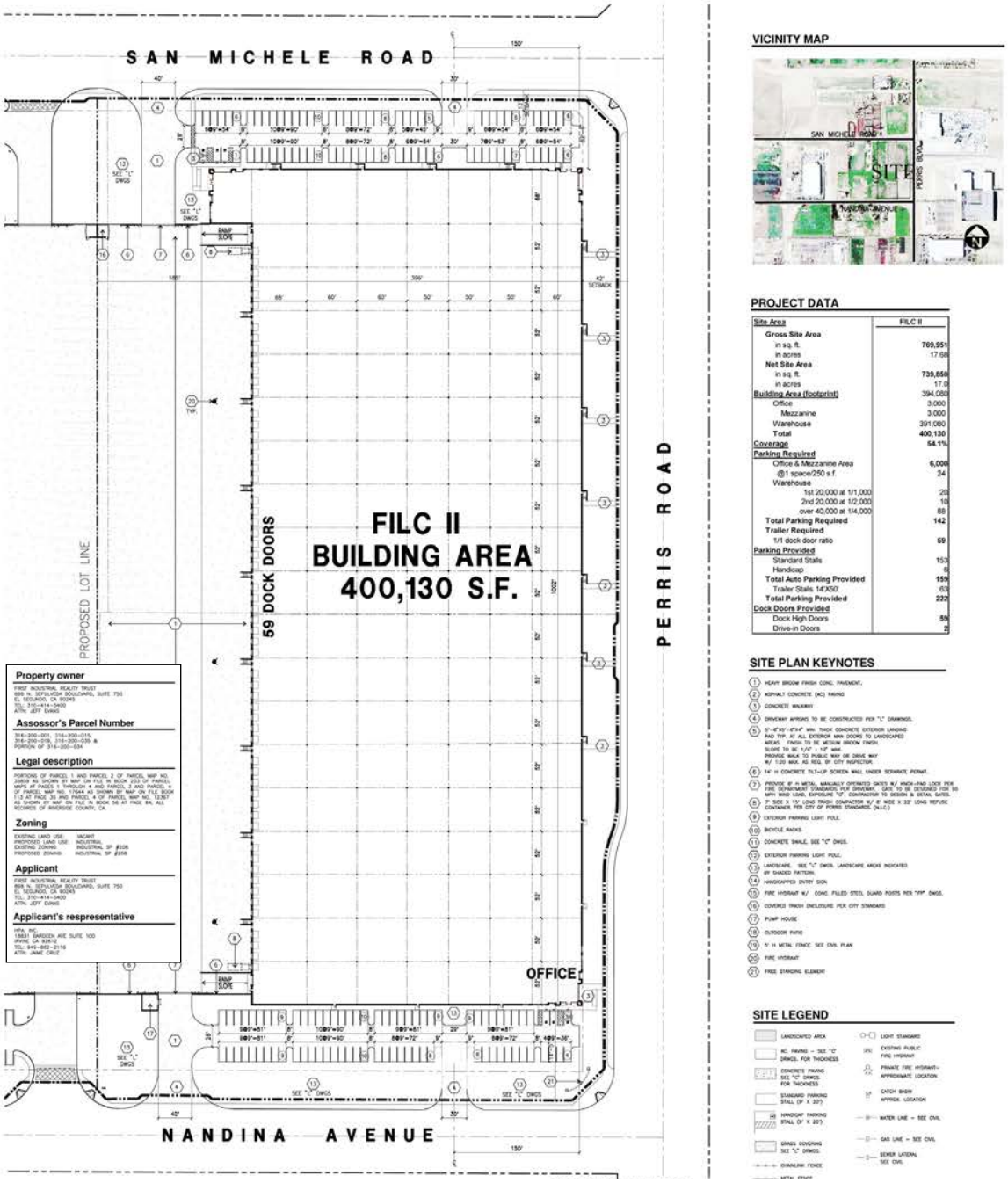
TELEPHONE
VERIZON
150 S. SANTA STREET
HEMET, CA 92543
PH. (909) 658-3303
ATTN: TOM DRISKALL



VICINITY MAP
NOT TO SCALE
PROJECT IS LOCATED IN: SECTION 31, T3S, R3W

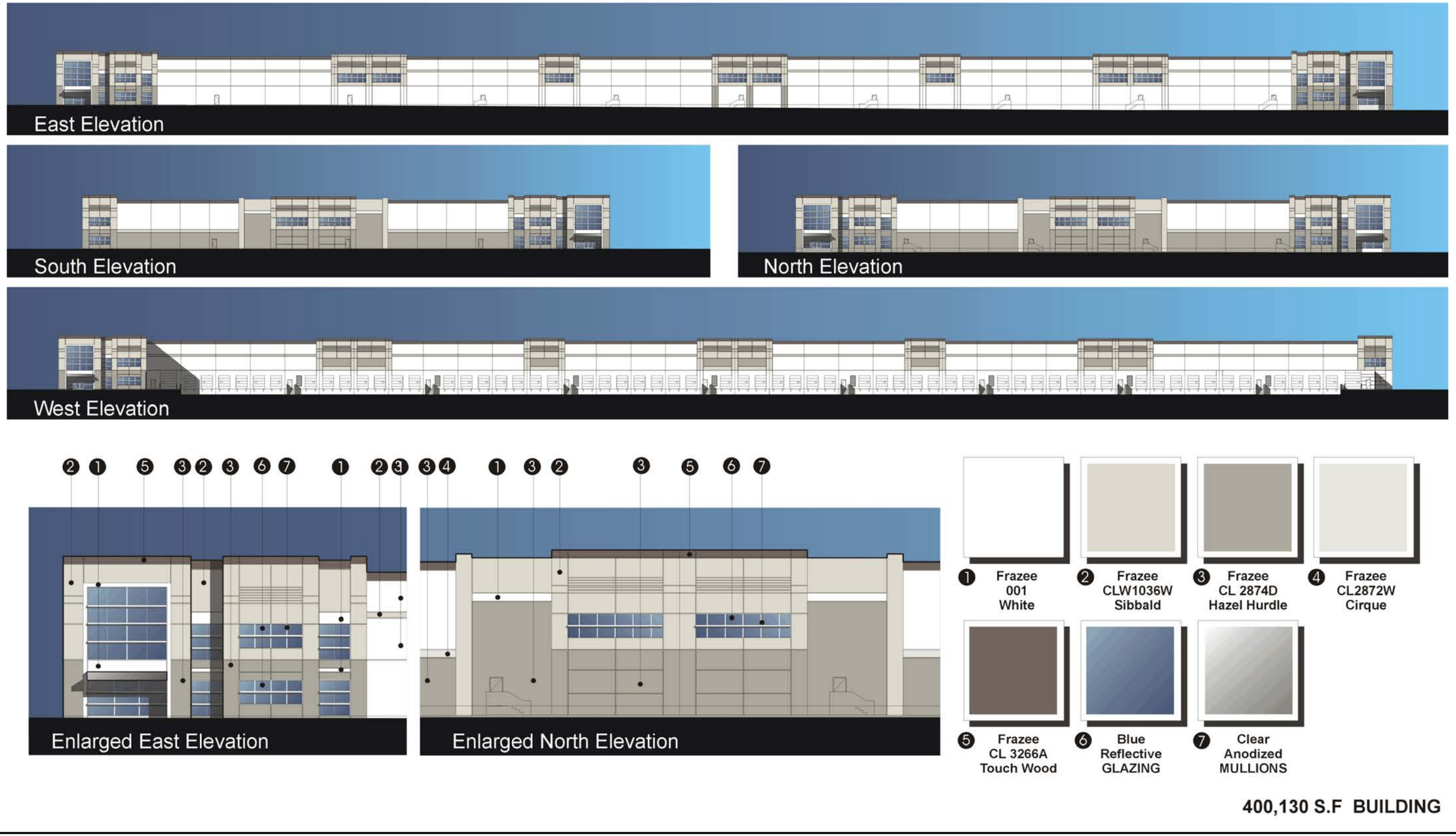
Source: Albert A. Webb Associates (November 2012)

FIGURE 3-4
Plot Plan PA12-0023



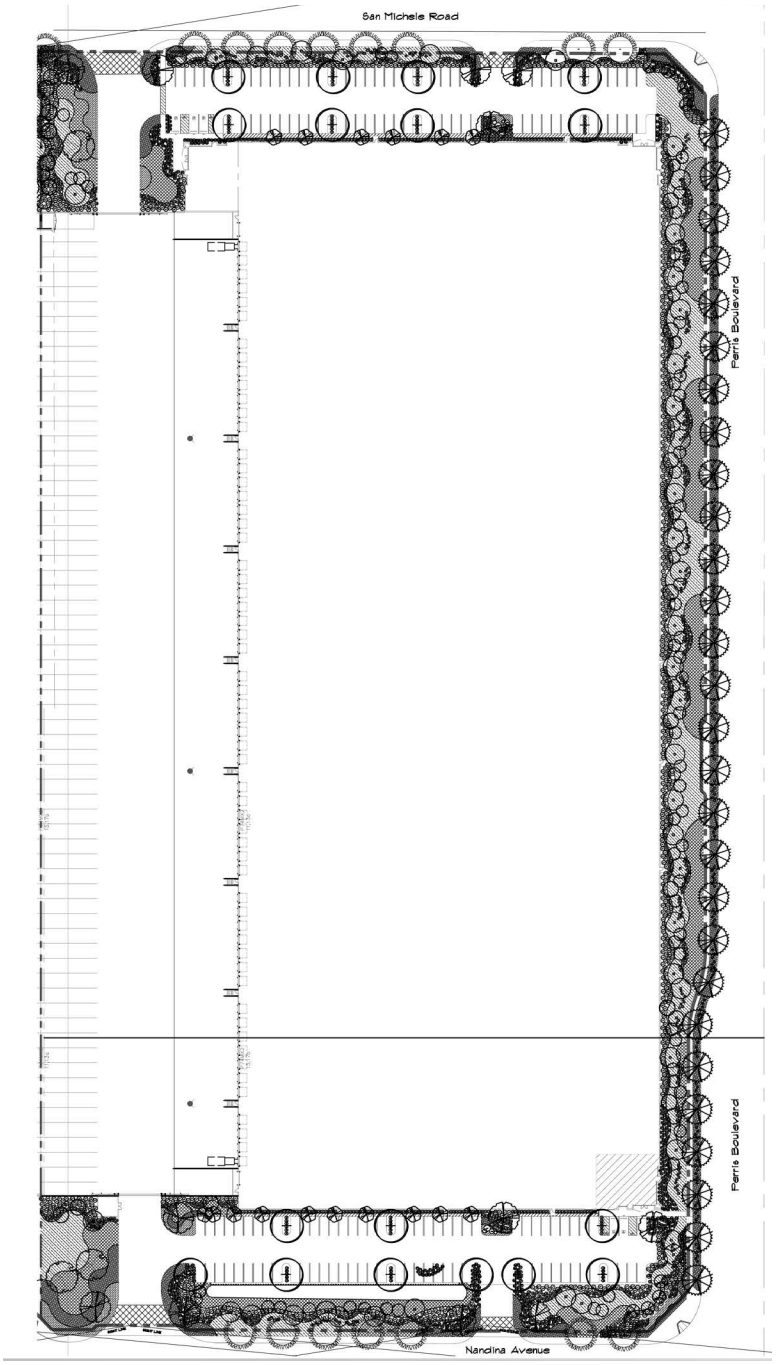
Source: HPA Architecture (May 2012)

FIGURE 3-5
Plot Plan PA12-0023 Detail



Source: HPA Architecture (May 2012)

FIGURE 3-6
Architectural Elevations



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	W.UCOLS	REMARKS
	Chitalpa tashkentensis Chitalpa	24" Box	17	L	Multi
	Koelreuteria bipinnata Chinese Flame Tree	36" Box	12	M	Multi
	Lagerstroemia i 'Muskogee' Crape Myrtle	24" Box	8	M	Multi
	Liquidambar styraciflua Sweetgum	15 Gal	6/3	M	Multi
	Liriodendron tulipifera Tulip Tree	24" Box	28	M	
	Pinus eldarica Afghan Pine	24" Box	17	L	
	Platanus acerifolia London Plane	24" Box	16	M	Standard
	Rhus lancea African Sumac	24" Box	43	L	
	Schinus molle California Pepper	24" Box	3	L	
	Tristania conferta Brisbane Box	15 Gal	16	L	
	Phoenix dactylifera Date Palm	15' bt	6	L	Skinned

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	W.UCOLS	REMARKS
	Dietes bicolor Fortnight Lily	5 Gal	328	L	
	Leptospermum s. 'Ruby Glow' New Zealand Tea Tree	5 Gal	34	L	
	Leucophyllum f. 'Green Cloud' Texas Ranger	5 Gal	6/37	L	
	Perovskia atriplicifolia Russian Sage	5 Gal	6	L	
	Rosmarinus o. 'Tuscan Blue' Rosemary	5 Gal	403	L	
	Salvia greggii Autumn Sage	5 Gal	363	L	
	Senna artemisioides Feathery Cassia	5 Gal	227	L	
	Westringia fruticosa Coast Rosemary	5 Gal	727	L	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	W.UCOLS	REMARKS
	Agave vilmoriniana Agave	15 Gal	2	L	
	Dasylirion wheeleri Desert Spoon	15 Gal	3	L	
	Pennisetum s. 'Cupreum' Purple Fountain Grass	5 Gal	221	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	W.UCOLS	REMARKS
	Acacia redolens 'Low Boy' Acacia	1 Gal	6' O.C.	L	
	Baccharis pilularis Coyote Bush	1 Gal	24" O.C.	L	
	Lantana 'Gold Mound' Gold Mound Lantana	1 Gal	30" O.C.	L	
	Lonicera j. 'Halliana' Hall's Honeysuckle	Flats	12" O.C.	L	
	Myoporum parvifolium Myoporum	1 Gal	36" O.C.	L	

NOTES:

1. ALL TREES WITHIN 5' OF HARDSCAPE SHALL BE IN A SHASTCON OR EQUAL ROOTBARRIER.
2. CONTRACTOR TO INSTALL CONCRETE MOW CURB BETWEEN PLANTERS AND TURF AREAS. SEE PLANTING DETAIL SHEET.
3. ALL PLANTER AREAS TO RECEIVE A 2" LAYER OF MEDIUM WALK ON BARK (3/4" -1/2").

THE ROOTBALL OF ANY PLANT SHALL NOT BE PLANTED AN CLOSER THAN 2' FROM ANY HARDSCAPE, BUILDING OR WALL.

Source: Hunter Landscape (May 2012)

FIGURE 3-7
Conceptual Landscaping Plan

4.0 ENVIRONMENTAL ANALYSIS

4.0.1 SUMMARY OF EIR SCOPE

In accordance with CEQA Guidelines §§15126 - 15126.4, this EIR Section 4.0, *Environmental Analysis*, provides analyses of potential direct, indirect, and cumulative impacts that have the potential to occur from planning, constructing, and/or operating the proposed Project.

In compliance with the procedural requirements of CEQA, an Initial Study was prepared to determine the scope of environmental analysis for this EIR. Public comment on the scope was considered in the form of written comments received by the City of Moreno Valley in response to the NOP issued for this EIR. Taking all known information and public comments into consideration, five (5) primary environmental subject areas are evaluated, as listed below. Each subsection evaluates several specific subject matters related to the general topic of the subsection. The title of each subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein.

4.1 Air Quality
4.2 Greenhouse Gas Emissions
4.3 Noise
4.4 Transportation/Traffic
4.5 Biological Resources

Twelve (12) environmental subjects were determined by the City to have no potential to be significantly impacted by the Project with mandatory compliance to regulatory requirements, as concluded by the Project's Initial Study (included in *Technical Appendix A* to this EIR) and after consideration of all comments received by the City on the scope of this EIR. These 12 subjects are discussed in Subsection 5.4, *Effects Found Not to be Significant as Part of the Initial Study Process*, and include: aesthetics, agriculture resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality, land use/planning, mineral resources, population and housing, public services, recreation, and utilities/service systems.

4.0.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in CEQA Guidelines §15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects creating related impacts" (CEQA Guidelines §15130(a)(1)). As defined in CEQA Guidelines §15355:

> 'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
>
> *(a) The individual effects may be changes resulting from a single project or a number of separate projects.*

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

CEQA Guidelines §15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis. These two approaches include: "1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency ['the list of projects approach'], or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact ['the summary of projections approach']."

The summary of projections approach is used in this EIR, except for the evaluation of cumulative traffic and vehicular-related air quality and noise impacts. The analysis of cumulative traffic impacts uses the list of projects approach, as is required to be used by the City of Moreno Valley Transportation Engineering Division's Traffic Impact Analysis Preparation Guide (August 2007). Therefore, the cumulative analysis of vehicular-related air quality and noise impacts which relies on the traffic study, inherently also encapsulates the list of projects approach.

Using the summary of projections approach, the cumulative study area includes the City of Moreno Valley, the City of Perris, the City of Riverside, and the Harvest Valley/Winchester Area Plan (HVWAP), Lakeview/Nuevo Area Plan (LNAP), and the Mead Valley Area Plan (MVAP), all of which are part of the Riverside County General Plan. These three cities and the three Riverside County Area Plans encompass portions of western Riverside County that have similar environmental characteristics as the Project area. The selected study area encompasses the Perris Valley, which is largely bounded by prominent topographic landforms, such as Reche Canyon to the north, the Badlands to the east, and the Lakeview Mountains to the southeast. This study area exhibits similar environmental characteristics as the Project site. This study area also encompasses the service areas of the Project's primary public service and utility providers. Areas outside of this study area either exhibit topographic, climatological, or other environmental circumstances that are different from those of the Project area, or are simply too far from the proposed Project site to be cumulatively considerable.

Environmental impacts associated with the buildout of the Riverside County General Plan were evaluated in a Program-level EIR certified by Riverside County in 2003 (SCH No. 2002051143). The Riverside County General Plan EIR is herein incorporated by reference, and is available for review at the County of Riverside Transportation and Land Management Agency Planning Department, 4080 Lemon Street, 12th Floor, Riverside CA 92502. Likewise, the environmental impacts associated with the buildout of the City of Perris General Plan were evaluated in a Program-level EIR that was certified by the Perris City Council on April 26, 2005 (SCH No. 2004031135). The City of Perris General Plan EIR is also incorporated by reference, and is available for review at the City of Perris Department of Community Development, 135 North "D" Street, Perris CA 92570. Finally, the environmental impacts associated with the buildout of the City of Riverside General Plan were evaluated in a Program-level EIR that was certified by the Riverside City Council in November

2007 (SCH No. 2004021108). The City of Riverside General Plan EIR is also incorporated by reference, and is available for review at the City of Riverside Community Development Department, Planning Division, 3900 Main Street, Riverside, CA 92522.

A specific cumulative study area was established using "the list of projects approach" to assess the cumulative effect of the Project's traffic and transportation impacts, as required by the City of Moreno Valley Transportation Engineering Division's Traffic Impact Analysis Preparation Guide. And, because the Project's traffic report is relied upon to evaluate vehicular-related air quality and noise impacts, the same cumulative study area was applied. The cumulative study area includes approved and pending development projects within an approximate three (3)-mile radius of the Project site, as well as several large, traffic-intensive projects falling beyond a three (3)-mile radius of the Project site. As such, the cumulative impact analysis of traffic impacts and vehicular-related air quality and noise impacts considers 53 other past, present, and reasonably foreseeable projects within this study area. The traffic and vehicular-related effects of projects physically located beyond the geographic area identified in the list of projects approach are captured as part of adding a compounded 2% annual growth rate to the analysis scenarios. This methodology presents a more reasonable approach to cumulative traffic analysis than the General Plan projection approach by recognizing development projects that actually have the potential to contribute traffic and vehicular-related air quality emissions and noise to the same intersections, roadway segments, and/or freeway segments as the proposed Project and have the potential to be made fully operational during a similar timeframe as the proposed Project. Specific development projects included in the traffic impact cumulative analysis are listed in Table 4-3 of the Project's Traffic Impact Analysis (refer to *Technical Appendix F*).

4.0.3 IDENTIFICATION OF IMPACTS

Subsections 4.1 through 4.5 of this EIR evaluate the five (5) environmental subjects warranting detailed analysis, as determined by this EIR's Initial Study. The format of discussion is standardized as much as possible in each section for ease of review. The environmental setting is discussed first, followed by a discussion of the Project's potential environmental impacts based on specified thresholds of significance used as criteria to determine whether potential environmental effects are significant. The thresholds of significance used in this EIR are based on the thresholds presented in CEQA Guidelines Appendix G and as applied by the City of Moreno Valley to create the Project's Initial Study Checklist (included in *Technical Appendix A* to this EIR). The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant. As required by CEQA Guidelines §15126.2(a), impacts are identified as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts of the proposed Project.

A summarized "impact statement" is provided in each subsection following the analysis. The following terms are used to describe the level of significance related to the environmental conditions affected by the proposed Project:

- <u>No Impact</u>: An adverse change in the physical environment would not occur.

- Less Than Significant Impact: An adverse change in the physical environment would occur but the change would not be substantial or potentially substantial and would not exceed the threshold(s) of significance presented in this EIR.

- Significant Impact: A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this EIR, requiring the consideration of mitigation measures.

Each subsection also includes a listing of the applicable regulatory criteria (laws, policies, regulations, etc.) that the Project is required to comply with (if any) related to the environmental subject area under evaluation. If impacts are identified as significant after the application of regulatory criteria, feasible mitigation measures are listed that could be applied to either avoid the impact or to reduce the magnitude of the impact. The following terms are used to describe the level of significance following the application of recommended mitigation measures:

- Less Than Significant Impact With Mitigation: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR; however, the impact can be avoided or reduced to a less than significant level through the application of feasible mitigation measures.

- Significant and Unavoidable Impact: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR. Feasible mitigation measures are either not available or would not be fully effective in avoiding or reducing the impact to below a level of significance.

For any impact identified as significant and unavoidable, the City of Moreno Valley would be required to adopt a statement of overriding considerations pursuant to CEQA Guidelines §15093 in order to approve the Project despite its significant impact(s) to the environment. The statement of overriding considerations would list the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the Project's administrative record on file at the City of Moreno Valley, that outweigh the unavoidable impacts.

4.1 AIR QUALITY

This subsection is based on two technical studies that were prepared by Urban Crossroads, Inc. to evaluate the Project's potential to adversely affect local and regional air quality. These studies include the following: 1) "First Inland Logistics II Air Quality Impact Analysis" (November 14, 2012), which is included as *Technical Appendix B* to this EIR (Urban Crossroads 2012a); and 2) "First Inland Logistics II Mobile Source Health Risk Assessment" (November 14, 2012), which is included as *Technical Appendix C* to this EIR (Urban Crossroads 2012b). In addition, information used to support the analysis in this subsection was obtained from the City of Moreno Valley General Plan (Moreno Valley 2006a) and California Air Resources Board (CARB 2009).

4.1.1 EXISTING CONDITIONS

A. Atmospheric Setting

The Project site is located in the South Coast Air Basin (SCAB or "Basin") which is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards. The SCAB encompasses approximately 6,745-square miles and includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. (Urban Crossroads, 2012a, p. 8)

B. Regional Climate and Meteorology

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence air quality. Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB and the conversion of sulfur dioxide to sulfates is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Because the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast. (Urban Crossroads, 2012a, pp. 8-9)

Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year there are approximately 10 hours of possible sunshine, and on the longest day of the year there are approximately 14-1/2 hours of possible sunshine. (Urban Crossroads, 2012a, p. 9)

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms

moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island that results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections. (Urban Crossroads, 2012a, p. 9)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. (Urban Crossroads, 2012a, p. 9)

A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides (NO_X) and carbon monoxide (CO) from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (Urban Crossroads, 2012a, p. 10)

C. Air Quality Pollutants and Associated Health Effects

The federal government and State of California have established maximum permissible concentrations for common air pollutants that may pose a risk to human health or would otherwise degrade air quality and adversely affect the environment. These regulated air pollutants are referred to as "criteria pollutants." An overview of the common criteria air pollutants in the SCAB, their sources, and associated effects to human health are summarized on the following pages.

- Carbon Monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. (Urban Crossroads, 2012a, p. 14)

  CO combines with hemoglobin to produce carboxyhemoglobin (COHb), which interferes with the transport of oxygen throughout the body. The most common symptoms associated with CO poisoning include headache, nausea, vomiting, dizziness, fatigue, and weakness. Exposure to CO can also result in chest pain. Individuals most at risk to the effects of CO

include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic oxygen deficiency. (Urban Crossroads, 2012a, p. 20)

- Sulfur Dioxide (SO_2) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SO_X). (Urban Crossroads, 2012a, p. 18)

- Nitrogen Oxides (NO_x) consist of nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O) and are formed when nitrogen (N_2) combines with oxygen (O_2). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes, and are major contributors to smog formation and acid deposition. NO_2 is a criteria air pollutant, and may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. Of the seven types of nitrogen oxide compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. (Urban Crossroads, 2012a, p. 18)

  Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_X. Short-term exposure to NO_X can result in resistance to air flow and airway contraction in healthy subjects. Exposure to NO_X can result in larger decreases in lung functions in individuals with asthma or chronic obstructive pulmonary diseases (e.g., chronic bronchitis, emphysema), as these individual are more susceptible to the effects of NO_X than healthy individuals. (Urban Crossroads, 2012a, p. 21)

- Ozone (O_3) is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. (Urban Crossroads, 2012a, p. 18)

  Short-term exposure (lasting for a few hours) to ozone at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. People exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects. An increased risk for asthma has been found in children who participate in multiple sports and live in communities with high ozone levels. (Urban Crossroads, 2012a, pp. 19-20)

- Particulate Matter is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. Particles that are 10 microns or smaller (PM_{10}) easily become airborne and can reduce visibility. Particles that are 2.5 microns or smaller ($PM_{2.5}$) are formed in the atmosphere by sulfates or nitrates, a byproduct of primary gaseous emissions of SO_2 and NO_x. (Urban Crossroads, 2012a, p. 18)

  Elevated ambient concentrations of fine particulate matter (PM_{10} and $PM_{2.5}$) have been linked to respiratory infections, number and severity of asthma attacks, and increased hospital admissions. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with pre-existing respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of PM_{10} and $PM_{2.5}$. (Urban Crossroads, 2012a, pp. 20-21)

- Volatile Organic Compounds (VOCs) and Reactive Organic Gasses (ROGs) are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. Both VOCs and ROGs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. VOCs and ROGs have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs and ROGs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. VOCs and ROGs are criteria pollutants since they are a precursor to O_3, which is a criteria pollutant. The SCAQMD uses the terms VOC and ROG interchangeably. (Urban Crossroads, 2012a, p. 19)

  Odors generated by VOCs and ROGs can irritate the eye, nose, and throat, which can reduce respiratory volume. In addition, studies have shown that the VOCs and ROGs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. (Urban Crossroads, 2012a, p. 22)

- Lead (Pb) is a heavy metal that is highly persistent in the environment. In the past, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. As a result of the removal of lead from gasoline, there have been no violations at any of the SCAQMD's regular air monitoring stations since 1982. Currently, emissions of lead are largely limited to stationary sources such as lead smelters. It should be noted that the Project is not anticipated to generate a quantifiable amount of lead emissions. Lead is a criteria air pollutant. (Urban Crossroads, 2012a, p. 19)

  Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and

death. Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. (Urban Crossroads, 2012a, pp. 21-22)

D. Existing Air Quality

Existing air quality is measured based upon ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect, as well health effects of each pollutant regulated under these standards are shown in Table 4.1-1, *State and National Criteria Pollutant Standards, Effects, and Sources*.

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards presented in Table 4.1-1. The air quality in a region is considered to be in attainment by the state if the measured ambient air pollutant levels for O_3, CO, SO_2, NO_2, PM_{10}, and $PM_{2.5}$ are not equaled or exceeded at any time in any consecutive three-year period; and the federal standards (other than O_3, PM_{10}, $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not exceeded more than once per year. The O_3 standard is attained when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when 99 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. (Urban Crossroads, 2012a, pp. 10-11)

❑ Regional Air Quality

The SCAQMD monitors levels of various criteria pollutants at 30 monitoring stations throughout the air district. In 2010, the federal and state standards were exceeded on one or more days for O_3, PM_{10}, and $PM_{2.5}$ at most monitoring locations. No areas of the SCAB exceeded federal or state standards for SO_2, CO, or sulfates. Table 4.1-2, *Attainment Status of Criteria Pollutants in the SCAB*, summarizes the attainment designations for the SCAB. (Urban Crossroads, 2012a, p. 14)

❑ Local Air Quality

The nearest long-term air quality monitoring site for O_3 and PM_{10} is the SCAQMD Perris monitoring station, located approximately 5.4 miles south of the Project site. Data for CO, NO_2, and $PM_{2.5}$ was obtained from the Metropolitan Riverside County 2 monitoring station. It should be noted that the Metropolitan Riverside County 2 monitoring station was utilized in lieu of the Perris monitoring station only in instances where data was not available from the Perris station. The three (3) years of most recent available data presented in Table 4.1-3, *Project Area Air Quality Monitoring Summary (2008-2010)*, shows the number of days that standards were exceeded for the study area, which was chosen to be representative of the local air quality at the Project site. Additionally, data for SO_2 has been omitted because attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations. (Urban Crossroads, 2012a, p. 14)

Table 4.1-1 State and National Criteria Pollutant Standards, Effects, and Sources

Pollutant	Averaging Time	State Standard	National Standard	Health and Atmospheric Effects	Major Sources
Ozone	1 hour 8 hours	0.09 ppm 0.07 ppm1	--- 0.075 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when reactive organic gases (ROG) and nitrogen oxides (NOx) react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial / industrial mobile equipment.
Carbon Monoxide	1 hour 8 hours	20 ppm 9.0 ppm	35 ppm 9 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
Nitrogen Dioxide	1 hour Annual Avg.	0.18 ppm 0.030	--- 0.053 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
Sulfur Dioxide	1 hour 3 hours 24 hours	0.25 ppm --- 0.04 ppm	75 ppb --- ---	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
Particulate Matter ≤ 10 Microns (PM-10)	24 hours Annual Avg.	50 µg/m3 20 µg/m3	150 µg/m3 ---	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
Particulate Matter ≤ 2.5 Microns (PM-2.5)	24 hours Annual Avg.	--- 12 µg/m3	35 µg/m3 15 µg/m3	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NOx, sulfur oxides, and organics.
Lead	Monthly Ave. Quarterly Rolling 3-Month Avg.	1.5 µg/m3 --- ---	--- 1.5 µg/m3 0.15 µg/m3	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction.	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
Hydrogen Sulfide	1 hour	0.03 ppm	No National Standard	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations)	Geothermal Power Plants, Petroleum Production and refining
Sulfates	24 hour	25 µg/m3	No National Standard	Breathing difficulties, aggravates asthma, reduced visibility	Produced by the reaction in the air of SO2.
Visibility Reducing Particles	8 hour	Light extinction of 0.23/km; visibility of 10 miles or more	No National Standard	Reduces visibility, reduced airport safety, lower real estate value, discourages tourism.	See PM10/PM2.5.

NOTE: ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter.

[1] This concentration was approved by the Air Resources Board on April 28, 2005 and became effective May 17, 2006.

SOURCE: California Air Resources Board, 09/08/2010 (http://www.arb.ca.gov/research/aaqs/aaqs2.pdf). *Ambient Air Quality Standards*, available at http://www.arb.ca.gov/research/aaqs/aaqs2.pdf Standards last updated November 17, 2008. California Air Resources Board, 2001. *CARB Fact Sheet: Air Pollution Sources, Effects and Control*, http://www.arb.ca.gov/research/health/fs/fs2/fs2.htm, page last updated December 2005.

Table 4.1-2 Attainment Status of Criteria Pollutants in the SCAB

Criteria Pollutant	State Designation	Federal Designation
Ozone - 1hour standard	Nonattainment	No Standard
Ozone - 8 hour standard	Nonattainment	Extreme Nonattainment[1]
PM_{10}	Nonattainment	Serious Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Attainment/Maintenance
Nitrogen Dioxide	Nonattainment[2]	Attainment/Maintenance
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment/Nonattainment[3]	Attainment/Nonattainment[4]
All others	Attainment/Unclassified	Attainment/Unclassified

Source: California Air Resources Board 2010 (http://www.arb.ca.gov/regact/2010/area10/area10.htm, http://www.arb.ca.gov/desig/feddesig.htm)

1 The USEPA approved redesignation from Severe 17 to Extreme Nonattainment on May 5, 2010 to be effective June 4, 2010.

2 The SCAB was reclassified from attainment to nonattainment for nitrogen dioxide on March 25, 2010.

3 Los Angeles County was reclassified from attainment to nonattainment for lead on March 25, 2010; the remainder of the SCAB is in attainment of the State Standard.

4 The Los Angeles County portion of the SCAB is classified as nonattainment; the remainder of the SCAB is in attainment of the State Standard.

Table 4.1-3 Project Area Air Quality Monitoring Summary (2008-2010)

POLLUTANT	STANDARD	YEAR		
		2008	2009	2010
Ozone (O_3)[a]				
Maximum 1-Hour Concentration (ppm)		0.142	0.125	0.122
Maximum 8-Hour Concentration (ppm)		0.114	0.108	0.107
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	65	53	42
Number of Days Exceeding State 8-Hour Standard	> 0.07 ppm	94	88	82
Number of Days Exceeding Federal 1-Hour Standard	> 0.12 ppm	4	1	0
Number of Days Exceeding Federal 8-Hour Standard	> 0.075 ppm	77	67	50
Number of Days Exceeding Health Advisory	≥ 0.15 ppm	0	0	0
Carbon Monoxide (CO)[b]				
Maximum 1-Hour Concentration (ppm)		7	3	3
Maximum 8-Hour Concentration (ppm)		2	1.8	1.7
Number of Days Exceeding State 1-Hour Standard	> 20 ppm	0	0	0
Number of Days Exceeding Federal / State 8-Hour Standard	> 9.0 ppm	0	0	0
Number of Days Exceeding Federal 1-Hour Standard	> 35 ppm	0	0	0
Nitrogen Dioxide (NO_2)[b]				
Maximum 1-Hour Concentration (ppm)		0.09	0.08	0.0608
Annual Arithmetic Mean Concentration (ppm)		0.0258	0.0200	0.0172
Number of Days Exceeding State 1-Hour Standard	> 0.18 ppm	0	0	0
Particulate Matter ≤ 10 Microns (PM_{10})[a]				
Maximum 24-Hour Concentration (μg/m^3)		85	80	51
Number of Samples		45	58	61
Number of Samples Exceeding State Standard	> 50 μg/m^3	12	9	1
Number of Samples Exceeding Federal Standard	> 150 μg/m^3	0	0	0
Particulate Matter ≤ 2.5 Microns ($PM_{2.5}$)[b]				
Maximum 24-Hour Concentration (μg/m^3)		43.0	42.2	43.7
Annual Arithmetic Mean (μg/m^3)		13.4	13.4	11.0
Number of Samples Exceeding Federal 24-Hour Standard	> 35 μg/m^3	4	2	2

a. Perris Monitoring Station (SRA 24) data.
b. Metropolitan Riverside County 2 (SRA 23/Magnolia) data.
Source: SCAQMD (www.aqmd.gov)

❑ Air Quality Conditions at Project Site

The Project site consists of an existing truck trailer parking lot and vacant land. While the southern portion of the site (developed as a parking lot) generates air emissions under existing conditions, such emissions are primarily associated with operation of the adjacent warehouse building to the west that was previously evaluated in an MND and Addenda prepared in accordance with CEQA (SCH No. 2008101041). According to the MND and its Addenda, operation of the parking lot does not exceed applicable SCAQMD regional and localized significance thresholds (Moreno Valley 2010, pp. 68-71).

The northern portion of the property is vacant under existing conditions and does not generate quantifiable air emissions. Maintenance activities for fire fuel management (i.e., discing) may generate temporary fugitive dust emissions of PM_{10} and $PM_{2.5}$; however, because detailed information is not available and given the infrequent and intermittent nature of site maintenance activities, temporary fugitive dust emissions that may be generated during discing cannot be accurately calculated and would be speculative in nature.

Absent additional information, existing air quality conditions at the Project site are assumed to be similar to local ambient conditions (presented in Table 4.1-3).

E. Applicable Environmental Regulations

The following is a brief description of the federal, state, and local environmental laws and related regulations governing air quality emissions.

❑ Federal Regulations

The U.S. Environmental Protection Agency (EPA) is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for O_3, CO, NO_x, SO_2, PM_{10}, and lead. The U.S. EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The U.S. EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of the CARB.

The Federal Clean Air Act (CAA) was first enacted in 1955 and was amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement State Implementation Plans (SIPs) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions).

Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants: O_3, NO_2, SO_2, PM_{10}, CO, $PM_{2.5}$, and lead. The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. Table 4.1-1 (previously presented) provides the NAAQS within the SCAB.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NOx, which is a collective term that includes all forms of nitrogen oxides (NO, NO_2, NO_3) emitted as byproducts of the combustion process.

❑ California Regulations

The CARB, which became part of the California EPA in 1991, is responsible for ensuring implementation of the California CAA (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. The California CAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. The CARB established the California Ambient Air Quality Standards (CAAQS) for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. However at this time, hydrogen sulfide and vinyl chloride are not measured at any monitoring stations in the SCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS.

All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS. Serious non-attainment areas are required to prepare air quality management plans that include specified emission reduction strategies in an effort to meet clean air goals.

❑ Air Quality Management Planning

Currently, the NAAQS and CAAQS are exceeded in most parts of the SCAB. In response, and in conformance with California Health & Safety Code §40702 et seq. and the California CAA, the SCAQMD has adopted an Air Quality Management Plan (AQMP) to plan for the regional improvement of air quality. AQMPs are updated regularly in order to more effectively reduce emissions and accommodate growth. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. The SCAQMD Governing Board adopted the AQMP applicable to evaluation in this EIR on June 1, 2007. On the date the NOP for this EIR was released for public review (December 3, 2012), SCAQMD's 2012 AQMP was not yet adopted, so the 2007 AQMP is applicable for evaluation. The 2012 AQMP was adopted by the SCAQMD's Governing Board on December 7, 2012.

As reported in the Executive Summary of the 2012 AQMP, air quality in the Basin is improving. "Over the years, the air quality in the Basin has improved significantly, thanks to the comprehensive control strategies implemented to reduce pollution from mobile and stationary sources." (SCAQMD, 2012, p ES-2). However, the 2012 AQMP also reports that the Basin exceeds the federal 8-hour ozone standard more frequently than any other location in the United States. In response, the 2012 AQMP recommends a strategy to reduce NOx emissions in the Basin.

4.1.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to air quality if the Project or any Project-related component would:

1. *Conflict with or obstruct implementation of the applicable air quality plan;*
2. *Violate any air quality standard or contribute substantially to an existing or projected air quality violation;*
3. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);*
4. *Expose sensitive receptors to substantial pollutant concentrations; or*
5. *Create objectionable odors affecting a substantial number of people.*

Within the context of the above significance thresholds, emissions generated by a development project would be significant under Thresholds 2 and 3 if they exceeded the regional thresholds established by the SCAQMD for criteria pollutants and would be significant pursuant to Threshold 4 if they exceeded the localized thresholds established by the State of California and the SCAQMD for criteria pollutants. The criteria applicable to the proposed Project are summarized in Table 4.1-4, *Regional and Localized Thresholds for Criteria Pollutants*. Pursuant to SCAQMD guidance, any project in the SCAB with daily emissions that would exceed any of the thresholds summarized in Table 4.1-4 would be considered as having a significant impact to air quality on both a direct (individual) and cumulative basis. (Urban Crossroads, 2012a, pp. 25-26)

In addition, pursuant to the thresholds established by the SCAQMD, any project that would emit toxic air contaminants, like diesel particulate matter, and expose receptor populations to an incremental cancer risk of greater than 10 in one million would be evaluated as having a significant impact to air quality under Threshold 4. (Urban Crossroads, 2012b)

4.1.3 IMPACT ANALYSIS

A. Methodology for Estimating Project-Related Construction Emissions

❑ Maximum Daily Emissions

The California Emissions Estimator Model™ (CalEEMod™), released by the SCAQMD on February 3, 2011, was used to estimate emissions of criteria pollutants NO_x, VOC, PM_{10}, $PM_{2.5}$, SO_X, and CO, associated with construction activities proposed by the Project. Construction-related emissions would be expected from the following construction activities:

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coatings (Painting)

- Construction Workers Commuting

Table 4.1-4 Regional and Localized Thresholds for Criteria Pollutants

POLLUTANT	CONSTRUCTION	OPERATIONAL
Maximum Daily Emissions (Regional Thresholds)		
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Ambient Air Quality for Criteria Pollutants (Localized Thresholds)		
NO_2 (1-hour average)	0.18 ppm	0.18 ppm
PM_{10} (24-hour average)	10.40 µg/m^3	2.50 µg/m^3
$PM_{2.5}$ (24-hour average)	10.40 µg/m^3	2.50 µg/m^3
CO (1-hour average)	20 ppm	20 ppm
CO (8-hour average)	9 ppm	9 ppm

NOTE: ppm = parts per million; µg/m3 = micrograms per cubic meter.

The southern portion of the Project site is currently occupied with an 8.4-acre truck parking yard. This parking area and associated surface improvements would be demolished to construct the proposed Project. The Project Applicant plans to demolish the asphaltic and concrete surfaces, which would be pulverized and stockpiled onsite for subsequent use in Project construction activities. The Project Applicant estimates that demolition activities would occur over a period of two (2) weeks but the air quality analysis conservatively assumes that demolition activates would occur over three (3) working weeks.

The duration of construction activity and associated equipment was estimated based on construction of similar projects in the City of Moreno Valley[1], CalEEMod™ defaults, and information provided by the Project Applicant. A detailed summary of construction equipment assumptions by phase is provided in Table 4.1-5, *Construction Equipment Assumptions*.

Dust is typically a major concern during rough grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod™ was used to calculate fugitive dust emissions resulting from this phase of activity. For purposes of modeling the Project's construction-related air emissions, demolition is expected to occur within the month of January 2013; Site Preparation is expected to occur from January 2013 through February 2013; Grading activities are expected to occur within the month of February 2013; Building

[1] VIP Moreno Valley Final Environmental Impact Report (June 27, 2012): http://www.moval.org/misc/vip-eir060420.shtml.

Table 4.1-5 Construction Equipment Assumptions

Operation	Crushing/Processing	Water Trucks	Concrete/Industrial Saws	Scraper	Grader	Rubber Tired Dozer	Tractor / Loader / Backhoe	Excavator	Pavers	Paving Equipment	Rollers	Forklift	Cranes	Air Compressor	Generator Set	Welder
Demolition	1		1			2		3								
Site Preparation		3				3	4									
Grading		3		2	1	1	2	2								
Building Construction							3					3	2		1	1
Paving									2	2	2					
Architectural Coating														1		

Construction is expected to occur from February 2013 through October 2013; Paving is expected to occur from October 2013 through November 2013; and Architecture Coatings are expected to occur from November 2013 through December 2013. This construction schedule represents a "worst-case" analysis scenario; should construction occur any time after these respective dates, construction-related emissions would decrease because emission factors for construction equipment decrease as the analysis year increases due to increasingly stringent regulatory requirements.

Construction emissions for construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction and earth materials delivered to the Project site), were estimated based on information from the Project Applicant and the CalEEMod™ defaults. Refer to Appendix A of the Air Quality Impact Analysis (*Technical Appendix B* to this EIR) for more details on the methodology and assumptions utilized to estimate Project-related construction emissions.

❑ Localized Emissions

Localized emissions associated with Project-related construction activities were estimated and evaluated in accordance with SCAQMD's Final Localized Significance Threshold Methodology. For the proposed Project, the Source Receptor Area (SRA) for Perris Valley was utilized as the baseline for ambient air quality. The SCAQMD produced look-up tables for projects that disturb less than or equal to 5 acres in size; however, the tables can be used as screening criteria for larger projects to determine whether or not dispersion modeling may be required. This approach is conservative as it assumes that all on-site emissions would occur within a 5-acre area and would over-predict potential localized impacts (i.e., more pollutant emissions occurring within a smaller area and within closer proximity to potential sensitive receptors). If a project exceeds the LST look-up values, then the SCAQMD recommends that project specific air quality modeling be performed. (Urban Crossroads, 2012a, pp. 38-39)

B. Methodology for Estimating Project-Related Operational Emissions

❑ Maximum Daily Emissions

SCQAMD's CalEEMod™ was used to estimate emissions of criteria pollutants, NO_X, VOC, PM^{10}, $PM_{2.5}$, SO_X, and CO, associated with long-term operation of the proposed Project. Operational emissions would be expected from the following primary sources:

- Vehicles
- Combustion Emissions associated with Natural Gas and Electricity
- Fugitive Dust related to Vehicular Travel
- Landscape Maintenance Equipment
- Architectural Coatings (Painting)

Trip characteristics from the Project's Traffic Impact Analysis (*Technical Appendix E* to this EIR) were used to estimate Project-related operational vehicular emissions. It should be noted that the Project's traffic study presents the total Project vehicle trips in terms of Passenger Car Equivalents (PCEs) in an effort to recognize and acknowledge the effects of heavy vehicles at the study area intersections. For purposes of the air quality study the PCE trips were not used; rather, to be more representative of actual air emissions, the actual number of passenger cars (including light trucks) and heavy trucks are used in the analysis. The vehicle fleet mix, in terms of actual vehicles, as derived from the traffic study for the Project is comprised of approximately 46% passenger cars (265 passenger cars) and approximately 54% total trucks (311 trucks) (Urban Crossroads, 2012a, p. 30). The total traffic generation in vehicles is 576 per day.

The Project's total traffic generation in vehicles was divided by the total number of square feet for the Project to derive the trip generation rate for input into the modeling program. For analysis purposes, the total 576 vehicles is divided by the total square footage for the proposed building (400,130 square feet) to derive an aggregate trip generation rate (1.44 trips per thousand square feet) for input into the model. Similarly, total truck trips (by axle) were summed; the total sum of all trucks was then divided by each category of trucks (by axle) to determine axle-specific truck percentage for the Project as a whole. The distribution of passenger cars was apportioned in accordance with the CalEEMod™ model default distribution and is summarized on Table 4.1-6, *Passenger Car Percentage Breakdown*. The distribution of truck traffic was apportioned in accordance with the CARB's *Assessment of Heavy-Duty Gasoline and Diesel Vehicles in California*, and is summarized on Table 4.1-7, *Heavy Duty Truck Percentage Breakdown*.

The Project's Air Quality Impact Analysis (*Technical Appendix B* to this EIR) uses a conservative approach for estimating long-term operational emissions associated with vehicle use. Per the SCAQMD 1993 CEQA Handbook, a one-way trip length of 17 miles was assumed for passenger car trips. For heavy duty trucks, the one-way trip length was derived using a formula that assumed that 50% of all Project-related heavy duty trucks would travel to the Port of Los Angeles/Long Beach (approximately 78 miles from the Project site), and the remaining 50% of all Project-related heavy duty trucks would be distributed equally to one of the following locations at far edges of the SCAB: Banning Pass; San Diego County Line; Cajon Pass; and Downtown Los Angeles. Using this formula, the average Project-related one-way heavy duty truck trip would be 61 miles. Weighting the average trip length by the Project's estimated vehicle fleet mix resulted in an average weighted

one-way trip length of 40.76 miles. The weighted one-way trip used in the evaluation of the Project's operational emissions is higher than the recommended values of the SCAQMD and Southern California Association of Governments (SCAG) and likely overstates the Project's long-term impact. (Urban Crossroads, 2012a, p. 34)

Table 4.1-6 Passenger Car Percentage Breakdown

Vehicle Class		Percentage of Vehicles
01 - Light-Duty Autos (PC)	LDA	55%
02 - Light-Duty Trucks (T1)	LDT1	8%
03 - Light-Duty Trucks (T2)	LDT2	25%
04 - Medium-Duty Trucks (T3)	MDV	12%

Table 4.1-7 Heavy Duty Truck Percentage Breakdown

Vehicle Class		Percentage of Vehicles
05 - Light HD Trucks (T4)	LHD1	4.6%
06 - Light HD Trucks (T5)	LHD2	1.3%
07 - Medium HD Trucks (T6)	MHD	45.2%
08 - Heavy HD Trucks (T7)	HHD	48.9%

Using the vehicle mix one-way trip length described above, the Project's operational vehicular emissions were derived from vehicle miles traveled (VMT). VMT for a given project is calculated by multiplying the total number of vehicle trips to/from the Project site by the average trip length (in miles). This likely results in the over-estimation and double-counting of emissions for distribution warehouse centers like the proposed Project because the proposed land use is likely to attract (divert) existing vehicle trips that are already on the circulation system as opposed to generating new trips. There are no known methodologies, however, for estimating the net effect of redistributed truck trips on freight truck vehicle miles within the region.

Project-related long-term operational emissions associated with use of natural gas and electricity, fugitive dust related to vehicular travel, operation of landscape maintenance equipment, and the application of architectural coatings were estimated using CalEEMod™ model defaults.

Please refer to Appendix A of the Air Quality Impact Analysis (*Technical Appendix B* to this EIR) for more details on the methodology and assumptions utilized to estimate Project-related operational emissions.

❑ Localized Emissions

The LST analysis includes on-site sources only; however, the CalEEMod™ outputs do not separate on-site and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emission inputs represent all on-site Project-related stationary (area) sources and five percent (5%) of the Project-related mobile sources. Considering that the weighted trip length used in CalEEMod™ for the Project is approximately 40.76 miles, 5% of this total would represent an on-site travel distance for each car and truck of approximately two (2.0) miles or 10,560 feet; thus the 5% assumption is conservative and would tend to overstate the actual impact. (Urban Crossroads, 2012a, p. 41)

A CO "Hot Spot" Analysis was not performed to evaluate the effect of Project-related vehicular emissions on localized concentrations of CO at intersections in the vicinity of the Project site. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 2003 AQMP, CO "Hot Spots" are typically associated with idling vehicles at extremely busy intersections (i.e., intersections with an excess of 100,000 vehicle trips per day) in areas with unusual meteorological and topographical conditions. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. As a result of this analysis, the SCAB has been designated as attainment for CO since 2007 (SCAQMD 2007) and even very busy intersections do not result in exceedances of the CO standard. Based on an analysis of the busiest intersections within the Project's vicinity, it was determined that none of the intersections in the vicinity of the Project would have peak hourly traffic volumes exceeding those at the intersections modeled in the 1992 CO Plan/2003 AQMP analysis. Therefore, Project-related vehicular emissions would not result in a substantial contribution of CO concentrations at intersections in the vicinity of the Project site and a CO "Hot Spot" analysis is not warranted. (Urban Crossroads, 2012a, pp. 42-44)

The nearest sensitive receptor land use (defined as a place where an individual could remain for 24-hours) would be the residence approximately 656 feet/200 meters north of the Project boundary, south of Rivard Road and west of Perris Boulevard. Accordingly, LSTs for receptors at 656 feet/200 meters are utilized in the analysis and provide for a conservative (i.e. "health protective") standard of care, as any receptors located further away would be exposed to a lesser impact. (Urban Crossroads, 2012a, p. 40)

C. Methodology for Estimating Project-Related Diesel Particulate Emissions

Diesel particulate emissions were estimated using the 2011 version of the Emission FACtor model (EMFAC) developed by the CARB. EMFAC 2011 is a mathematical model that calculates emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB for projections of changes in future emissions from on-road mobile sources. The EMFAC 2011 model quantifies annual diesel particulate exposure for different receptor populations using a variety of factors including vehicle activity, vehicle speed, temperature and relative humidity. Refer to Pages 9 through 13 of the Project's Mobile Source Health Risk Assessment (*Technical Appendix C* to this EIR) for a detailed description of the model inputs and equations used in the estimation of Project-related diesel particulate emissions. (Urban Crossroads, 2012b, pp. 9-13)

The effect of Project-related diesel particulate emissions was quantified in accordance with the SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Pursuant to SCAQMD's recommendations, the AEROMOD model was used (Urban Crossroads, 2012b, p. 13). Refer to Pages 13 through 17 of the Project's Mobile Source Health Risk Assessment (*Technical Appendix C* to this EIR) for a detailed description of the model inputs and equations used in the estimation of average particulate concentrations associated with operations at the Project site.

Health risks associated with exposure to diesel particulate emissions are defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. The cancer risk probability is determined through a series of equations to calculate unit risk factor, cancer potency factor, and chronic daily intake. The equations and input factors utilized in the Project analysis were obtained from the California EPA, Office of Environmental Health Hazard (Urban Crossroads, 2012b, p. 17). Refer to Pages 17 through 19 of the Project's Mobile Source Health Risk Assessment (*Technical Appendix C* to this EIR) for a detailed description of the variable inputs and equations used in the estimation of receptor population health risks associated with operations at the Project site.

The project level threshold of significance for toxic air contaminants is 10 in one million for both direct and cumulative impacts, which is consistent with AQMD guidance. The AQMD published a report on how to address direct and cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (August 2003). In this report the AQMD states (Page D-3):

> *"…the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

Threshold 1: Would the proposed Project conflict with or obstruct implementation of the applicable air quality plan?

Because the 2012 AQMP was not adopted at the time the NOP for this EIR was distributed for public on December 3, 2012, the applicable air quality plan for the Project's evaluation in this EIR is the

2007 AQMP. The 2007 AQMP projects long-term air quality conditions for the SCAB. The air quality conditions presented in the 2007 AQMP are based in part on the growth forecasts that were used as inputs for SCAG's regional transportation model. The growth forecasts utilized in the 2007 AQMP are based on the growth projections identified by SCAG in its 2004 Regional Transportation Plan (RTP). The RTP assumed that development in the various incorporated and unincorporated areas within the SCAB would occur in accordance with the adopted general plans for these areas. In addition, the air quality conditions presented in the 2007 AQMP are based on the assumption that future development projects would implement strategies to reduce emissions generated during the construction and operational phases of development. Accordingly, if a proposed project is consistent with these growth forecasts, and if available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project would be considered to be consistent with the AQMP.

The SCAQMD has established criteria for determining consistency with the 2007 AQMP. These criteria are defined in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook and are discussed below. These are the same consistency criteria that are used to determine consistency with the 2012 AQMP as well. Because the City of Moreno Valley's General Plan designates the Project site as "Industrial" and that land use designation did not change between the time of the 2007 AQMP and 2012 AQMP, the growth forecast used for the Project site in both the 2007 and 2012 AQMPs is the same.

- ***Consistency Criterion No. 1****: The proposed project will not 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.*

The violations to which Consistency Criterion No. 1 refers are the CAAQS and NAAQS. Violations of the CAAQS and NAAQS would occur if localized significance thresholds (LSTs) were exceeded. As evaluated as part of the Project LST analysis (refer to Threshold 4, below), the Project's mitigated localized construction-source emissions would not exceed applicable LSTs; therefore, a violation would not occur. Similarly, the Project LST analysis demonstrates that Project operational-source emissions would not exceed applicable LSTs.

However, as discussed under the analysis of Thresholds 2 and 3 (below), Project operations would result in or cause exceedances of certain SCAQMD regional thresholds. Although operational emissions would be generated in excess of SCAQMD's regional threshold criteria, these emissions are accounted for in the AQMP and the AQMP air quality attainment goals. That is, land uses and development proposed by the Project are consistent with land uses and development intensities reflected in the currently adopted City of Moreno Valley General Plan, and are therefore within the scope of air quality considerations reflected in the AQMP. Moreover, the Project's urban location and proximity to local and regional transportation facilities acts to reduce vehicle miles traveled and associated mobile-source (vehicular) emissions. Additionally, Project incorporation of mandatory energy-efficient technologies as required by the California Building Standards Code, and mandatory compliance with SCAQMD emissions reduction rules and control requirements, act to reduce stationary-source air emissions. These Project attributes and features are consistent with and support AQMP air pollution reduction strategies and promote timely attainment of AQMP air quality standards.

On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion.

- ***Consistency Criterion No. 2****: The proposed project will not exceed the assumptions in the AQMP in 2011 or increments based on the years of project buildout phase.*

Assumptions of the AQMP used in projecting future emissions levels are based in part on land use data provided by lead agency general plan documentation. Projects that propose general plan amendments and changes of zone may increase the intensity of use and/or result in higher traffic volumes, thereby resulting in increased stationary area source emissions and/or vehicle source emissions when compared to the AQMP assumptions. If however, a project does not exceed the growth projections in the applicable general plan, then the project is considered to be consistent with the growth assumptions in the AQMP.

The Project site is designated as "Industrial" by the Moreno Valley General Plan and uses proposed by the Project are consistent with this designation. The Project also does not plan to increase the development intensity beyond that currently anticipated for the subject site as reflected in Moreno Valley's Specific Plan 208. Because the land use proposed by the Project is consistent with the adopted General Plan, the Project is in compliance with Consistency Criterion No. 2.

In summary, because the proposed Project satisfies both of the two aforementioned criteria for determining consistency, the Project is deemed consistent with the AQMP and an impact due to a conflict with or obstruction of the applicable air quality management plan would not occur.

Threshold 2:	***Would the proposed Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?***
Threshold 3:	***Would the proposed Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?***

❑ Construction Emissions

Applying the methodology presented previously in Subsection 4.1.3A, the estimated maximum daily construction emissions are summarized on Table 4.1-8, *Emissions Summary of Construction Activities (Without Mitigation)*. As shown, emissions resulting from Project construction would exceed criteria pollutant thresholds established by the SCAQMD for emissions of VOCs and NO_x (before mitigation). In addition, the SCAB does not attain state criteria for NO_x concentrations, as previously presented in Table 4.1-2. Furthermore, NO_x and VOCs are precursors for O_3, and the SCAB is identified as a federal and state non-attainment area for O_3 (see Table 4.1-2). As such, near-term construction activities would violate the air quality standard for VOCs and NO_x, would contribute to an existing regional air quality violation, and would cumulatively contribute to the net increase of two criteria pollutants (O_3 and NO_x) for which the region is non-attainment. Accordingly, construction-related emissions of VOCs and NOx are therefore considered a significant direct and cumulative impact for which mitigation would be required.

Table 4.1-8 Emissions Summary of Construction Activities (Without Mitigation)

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**81.55**	**111.99**	**63.63**	**0.14**	**68.68**	**12.64**
SCAQMD Regional Threshold	75	100	550	150	150	55
Significant?	**YES**	**YES**	**NO**	**NO**	**NO**	**NO**

Note: Please refer to Appendix A of the Project's Air Quality Impact Analysis (*Technical Appendix B* to this EIR) for the CalEEMod™ output files and additional hand calculations for the estimated emissions.

❑ Operational Emissions

The Project-related operations emissions, along with a comparison of SCAQMD significance thresholds, are shown on Table 4.1-9, *Summary of Peak Operational Emissions (Without Mitigation)*. As shown, the Project's long-term operational emissions would exceed the SCAQMD threshold of significance for NO_x. In addition, the SCAB does not attain state criteria for NO_x concentrations, as previously presented above. Furthermore, NO_x is a precursor for O_3, and the SCAB is identified as a federal and state non-attainment area for O_3 (see Table 4.1-2). As such, the Project's long-term operational activities would violate the air quality standard for NO_x, would contribute to an existing regional air quality violation, and would cumulatively contribute to the net increase of a criteria pollutant (NO_x) for which the region is non-attainment. These impacts are concluded to be significant on a direct and cumulative basis and mitigation would be required.

Regarding area source emissions, the proposed Project is designed to meet or surpass California Building Code Title 24 energy efficiency requirements, thereby acting to reduce area-source emissions to the extent feasible. However, emissions of NO_x are primarily the result of mobile source emissions (vehicles traveling to and from the Project site). The Project's location proximate to major local roadways and regional freeway facilities (namely Harley Knox Boulevard (a designated truck route) and the I-215 Freeway) acts to reduce vehicle miles traveled with correlating reductions in vehicle source emissions. (Urban Crossroads, 2012a, p. 38)

Federal and state agencies regulate and enforce vehicle emission standards. CARB's Diesel Risk Reduction Plan (DRRP) led to the adoption of new state regulatory standards for all new on-road, off-road, and stationary diesel-fueled engines and vehicles to reduce diesel particulate matter (DPM) emissions by about 90 percent overall from year 2000 levels. Specifically, the operation of diesel fueled vehicles are currently subject to the California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025, "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles" and to California Code of Regulations Title 13, Division 3, Chapter 10, Article 1, Section 2485, "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling." Reductions in pollutant emissions are anticipated to continue to accrue for the foreseeable future as current and more stringent state and federal regulations are implemented and older, less controlled vehicles and equipment are retired or retrofitted with required pollution control devices. The City of Moreno Valley does not have the resources to impose and enforce restrictions on engine use and vehicle emissions above and beyond the requirements of state and federal law. And, even if the City were to apply more stringent emission restrictions on individual projects, such a restriction would merely entice the vehicles fleet operators that do not meet the stricter restriction to operate at another

Table 4.1-9 Summary of Peak Operational Emissions (Without Mitigation)

SUMMER MONTHS

Operational Activities	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Source Emissions-Maintenance/Other [a]	10.46	--	--	--	--	--
Energy Source Emissions [b]	0.03	0.23	0.19	--	0.02	0.02
Mobile Source Emissions [c]	21.60	221.09	161.80	0.36	35.44	8.54
Maximum Daily Emissions	**32.09**	**221.32**	**161.99**	**0.36**	**35.46**	**8.56**
SCAQMD Regional Threshold	55	55	550	150	150	55
Significant?	**NO**	**YES**	**NO**	**NO**	**NO**	**NO**

WINTER MONTHS

Operational Activities	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Source Emissions-Maintenance [a]	10.46	--	--	--	--	--
Energy Source Emissions [b]	0.03	0.23	0.19	--	0.02	0.02
Mobile Source Emissions [c]	22.23	235.90	159.25	0.35	35.48	8.57
Maximum Daily Emissions	**32.72**	**236.13**	**159.44**	**0.35**	**35.50**	**8.59**
SCAQMD Regional Threshold	55	55	550	150	150	55
Significant?	**NO**	**YES**	**NO**	**NO**	**NO**	**NO**

building or in another location in the SCAB where the mobile source restriction does not apply, thereby resulting in no improvement to regional air quality.

Threshold 4: Would the proposed Project expose sensitive receptors to substantial pollutant concentrations?

During construction and long-term operation, the Project has the potential to expose nearby sensitive receptors to pollutant concentrations. The following provides an analysis based on the applicable localized significance thresholds established by the State of California and SCAQMD.

❑ Construction-Related Localized Emissions

Table 4.1-10, *Localized Significance Summary for Construction Activities (Without Mitigation)*, presents the results of the localized significance analysis for construction-related emissions. Detailed localized emissions model outputs are presented in Attachment A to the Air Quality Impact Analysis (*Technical Appendix B* to this EIR). As shown, during site preparation and grading activities, Project-related construction emissions would not exceed the SCAQMD Localized Threshold for NO_x, CO, PM_{10}, or $PM_{2.5}$. Localized emission levels would be further reduced with the incorporation of the construction-related mitigation measures presented below in Subsection 4.1.7. (Refer to Tables 3-9 and 3-11 of the Project's Air Quality Impact Analysis (*Technical Appendix B* to this EIR) for a summary of construction-related localized emissions following the incorporation of mitigation). Accordingly, construction of the proposed Project would not result in the exposure of any sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Table 4.1-10 Localized Significance Summary for Construction Activities (Without Mitigation)

SITE PREPARATION

Activity	NO_x	CO	PM_{10}	$PM_{2.5}$
Site Preparation	**54.15**	**30.68**	**22.53**	**12.59**
SCAQMD Localized Threshold	434	5,998	86	27
Significant?	**NO**	**NO**	**NO**	**NO**

GRADING

Activity	NO_x	CO	PM_{10}	$PM_{2.5}$
Grading	**65.32**	**35.42**	**10.29**	**6.38**
SCAQMD Localized Threshold	452	6,285	89	28
Significant?	**NO**	**NO**	**NO**	**NO**

- **Operational-Related Localized Emissions**

  - *Criteria Pollutant Emissions*

Table 4.1-11, *Localized Significance Summary for Operational Activities (Without Mitigation)*, presents the results of the long-term localized significance threshold analysis. Detailed operational localized emissions model outputs are presented in Attachment A to the Air Quality Impact Analysis (*Technical Appendix B* to this EIR).

Results of the analysis indicate that estimated Project-related long-term operational emissions would not exceed localized emissions thresholds established by the SCAQMD. In addition, the proposed Project has no potential to cause or contribute to any CO "hotspots." (Urban Crossroads, 2012a, p. 47) Accordingly, under long-term operating conditions, the proposed Project would not expose any sensitive receptors to substantial Project-related pollutant concentrations, and impacts would be less than significant.

Table 4.1-11 Localized Significance Summary for Operational Activities (Without Mitigation)

Operational Activity	NO_x	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	**11.28**	**8.28**	**1.79**	**0.45**
SCAQMD Localized Threshold	488	6,860	23	8
Significant?	**NO**	**NO**	**NO**	**NO**

Source Receptor Area: 24, 5 acres, 200 meter distance, on-site traffic 5% of total.

  - *Diesel Particulate Emissions*

The SCAQMD has conducted an in-depth analysis of the toxic air contaminants and their resulting health risks for all of Southern California. This study, entitled, *Multiple Air Toxics Exposure Study in the South Coast Air Basin, MATES III*, predicted an excess cancer risk of 566 in one million for the Project area. Project-related Diesel Particulate Matter (DPM) cancer risks were evaluated under three

(3) operational scenarios as part of the Project's Mobile Health Risk Assessment (*Technical Appendix C* to this EIR), which are discussed below.

For the Residential Exposure Scenario, results indicate that particulate emissions generated from the Project would not create a significant health risk to residential land uses in the Project area. At the maximally exposed individual receptor (MEIR), the maximum risk is estimated to be 4.64 in one million, which does not exceed the SCAQMD DPM-source cancer risk (risk) threshold of 10 in one million. (Urban Crossroads, 2012b, p. 19) Accordingly, diesel particulate emissions would result in a less than significant impact to residential receptors.

For the Worker Exposure Scenario, results indicate that particulate emissions generated from the Project would not pose a significant health risk to workers in the project area. At the maximally exposed individual worker (MEIW), the maximum risk is estimated to be 1.23 in one million, which does not exceed the risk threshold of 10 in one million. (Urban Crossroads, 2012b, pp. 19-20) Accordingly, diesel particulate emissions would result in a less than significant impact to future Project site workers and other workers in the area.

For the School Child Exposure Scenario, results indicate that particulate emissions generated from the Project would not create a significant health risk to school children in the Project area. At the maximally exposed individual school child (MEISC), the maximum risk is estimated to be 0.08 in one million, which does not exceed the SCAQMD risk threshold of 10 in one million. (Urban Crossroads, 2012b, p. 20) Accordingly, diesel particulate emissions would result in a less than significant impact to school children.

An evaluation of the potential noncarcinogenic effects of chronic exposures also was conducted. For purposes of this analysis the hazard index for the respiratory endpoint totaled less than one for all receptors in the Project vicinity, and thus is less than significant. (Urban Crossroads, 2012b, p. 20) Refer to Page 20 of the Project's Mobile Source Health Risk Assessment (*Technical Appendix C* to this EIR) for a detailed description of the variable inputs and equations used in the estimation of potential noncarcinogenic effects.

Threshold 5: Would the proposed Project create objectionable odors affecting a substantial number of people?

The potential for the Project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include:

- Agricultural uses (livestock, farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

The Project does not propose land uses typically associated with emitting objectionable odors. Potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities (which are not

typically objectionable), and the temporary storage of typical solid waste (refuse) associated with the Project's long-term operational uses.

Standard construction procedures would minimize odor impacts resulting from construction activity. Additionally, any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity; and, a substantial number of people are not concentrated around the Project site and could thus not be affected. For these reasons, it is concluded that construction-related odors would be less than significant because odors would be short term, not objectionable, and not affect a substantial population. For long-term operational conditions, Project-generated refuse would be required to be stored in covered containers and removed at regular intervals in compliance with the City of Moreno Valley's solid waste regulations. The Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, impacts due to odors associated with the Project construction and long-term operation would be less than significant.

4.1.4 CUMULATIVE IMPACT ANALYSIS

The proposed Project would implement the Moreno Valley General Plan and Moreno Valley Industrial Area Plan land use designations applied to the Project site. As such, the Project would be consistent with the growth forecasts used in the SCAQMD's 2007 AQMP to predict future air quality conditions in the SCAB. Accordingly, emissions that would be generated by the Project are assumed to be accounted for in the AQMP, and the Project would not conflict with or obstruct the implementation of the SCAQMD AQMP on a cumulative basis.

The Project area is designated as an extreme non-attainment area for O_3, and a non-attainment area for PM_{10} and $PM_{2.5}$. The Project-specific evaluation of emissions demonstrates that the proposed Project would exceed the SCAQMD regional thresholds for VOCs and NO_x during construction activities, and would exceed the SCAQMD regional threshold for NO_x under long-term operating conditions. Because NO_x and VOCs are a precursor for O_3, the Project's near- and long-term emissions would cumulatively contribute to criteria pollutants for which the Project region is in non-attainment (i.e., NO_x and O_3) and would violate the SCAQMD air quality standards for VOCs and NO_x during construction and NO_x during long-term operation. These impacts are concluded to be cumulatively significant, the Project's contribution would be cumulatively considerable, and mitigation would be required.

As demonstrated in the analysis of Threshold 4, above, air emissions generated by the Project during construction and operation would not violate the SCAQMD Localized Thresholds for NO_x, CO, PM_{10}, or $PM_{2.5}$. In addition, Project-related operational emissions of diesel particulates would not result in significant mobile-source health risks to any nearby sensitive receptors. There are currently no proposals for new construction adjacent to the proposed Project site; accordingly, there is no potential for cumulatively significant localized impacts during construction. Under long-term operating conditions, Project operations also would be far below the SCAQMD Localized Significance Thresholds. Therefore, it is reasonable to conclude that even when combined with localized emissions from future developments within close proximity to the Project site, such emissions would not exceed SCAQMD thresholds. Accordingly, long-term operation of the Project would not expose nearby sensitive receptors to substantial localized pollutant concentrations, and a cumulative considerable impact would not occur.

The SCAQMD has conducted an in-depth analysis of the toxic air contaminants and their resulting health risks for all of Southern California. This study, entitled, *Multiple Air Toxics Exposure Study in the South Coast Air Basin, MATES III*, predicted an excess cancer risk of 566 in one million for the Project area. DPM is included in this cancer risk along with all other toxic air contaminant (TAC) sources. DPM accounts for 83.6% of the total risk shown in MATES-III. The total risk derived by the MATES-III study was added to the Project source risks to determine the cumulative risks in the Project area, which is summarized in Table 4.1-12, *Cumulative Cancer Risk*. As shown in Table 4.1-12, the highest cumulative with Project cancer risks for residential receptors would be 570.64 in one million (or an increase of 4.64 in one million over background conditions). For workers, the highest cumulative with Project risk would be 567.23 in one million (or an increase of 1.23 in one million over background conditions). The highest cumulative with Project cancer risks for school children would be 566.08 in one million (or an increase of 0.08 in one million over background conditions). In all cases, the Project's incremental contribution to cancer risk would be below the 10 in one million threshold set by SCAQMD; accordingly, the proposed Project would result in a less than significant cumulative impact due to DPM emissions and their attendant cancer risk. (Urban Crossroads, 2012b, pp. 21-22)

Table 4.1-12 Cumulative Cancer Risk

	Cancer Risk as Maximum Sensitive Receptor (risk in one million)		
	Background	**Project Site**	**Total Cumulative Risk**
Maximum Impact to All Receptors Without Project	566	N/A	566
Maximum Impact to Nearest Residential With Project	566	4.64	570.64
Maximum Impact to Nearest Worker With Project	566	1.23	567.23
Maximum Impact to Nearest School With Project	566	0.08	566.08

Source: (Urban Crossroads, 2012b, Table 2-7)

The proposed Project would not involve a land use that is associated with the generation of odors, and construction odors would occur only in the near-term and would be short-term and intermittent in nature. There also are no odor emitters in the Project's cumulative study area which, when combined with Project-related odors, could affect a substantial number of people. Since the Project has no potential to create substantial amounts of odor during long-term operation, and since it is reasonable to conclude that no adjacent properties would be under development simultaneously with the proposed Project, the Project would not result in a significant odor-related impact under near- or long-term conditions.

4.1.5 APPLICABLE PROJECT REQUIREMENTS

The following is a list of requirements and/or conditions to which the Project would be required to adhere. Compliance with these measures was assumed throughout the above analysis of air quality impacts.

PR 4.2-1 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 402, "Nuisance."

PR 4.2-2 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust." Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving activities, grading, and equipment travel on unpaved roads.

PR 4.2-3 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 431.2, "Sulfur Content of Liquid Fuels."

PR 4.2-4 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, "Architectural Coatings."

PR 4.2-5 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1186, "PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations."

PR 4.2-6 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1186.1, "Less-Polluting Street Sweepers."

PR 4.2-7 The Project is required to comply with California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025, "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles."

PR 4.2-8 The Project is required to comply with California Code of Regulations Title 13, Division 3, Chapter 10, Article 1, Section 2485, "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling."

PR 4.2-9 The Project is required to comply with California Code of Regulations Title 24, "California Building Standards Code" and the "California Green Building Code."

4.1.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold 1: No Impact. The proposed Project would not conflict with or obstruct implementation of the SCAQMD's AQMP.

Thresholds 2 and 3: Significant Direct and Cumulative Impact (Near- and Long-Term). Emissions during Project construction (near-term) would violate the SCAQMD regional thresholds for VOCs and NO_x. In addition, emissions during Project operation (long term) are projected to exceed the SCAQMD regional threshold for NO_x. Near-term emissions of VOCs and near- and long-term emissions of NO_x also would contribute to an existing air quality violation in the SCAB (i.e., non-attainment status for O_3) because both VOCs and NO_x are precursors for O_3. As such, Project-related air emissions would violate SCAQMD air quality standards and contribute to the non-attainment status of a criteria pollutant (i.e., O_3). These Project-related air emissions are concluded to be a significant impact on a direct and cumulative basis.

Threshold 4: Less than Significant Impact. Near-term construction and long-term operation of the proposed Project would not expose nearby sensitive receptors to substantial pollutant concentrations of any criteria pollutant or diesel particulate matter. As such, a less than significant impact would occur.

Threshold 5: Less than Significant Impact. The Project does not propose land uses or operational activities associated with emitting objectionable odors. Any odor emissions generated during Project construction would be short term, not objectionable, and not affect a substantial population. Therefore, impacts due to odors would be less than significant.

4.1.7 MITIGATION MEASURES

Although Project-related particulate matter emissions (PM_{10} and $PM_{2.5}$) would be less than significant, the following mitigation measures are recommended to further reduce the Project's less than significant impact.

MM 4.1-1 Prior to grading permit issuance, the City shall verify that the following notes are specified on the grading plan to ensure implementation of SCAQMD Rule 403. It should be noted that the following list is non-exclusive, and identifies only key provisions of the SCAQMD Rule 403 requirements; regardless the Project shall be required to comply with all applicable provisions of SCAQMD Rule 403, whether listed below or not. Specifically, Project contractors shall be required to comply with the following notes and all other applicable SCAQMD Rule 403 requirements, and shall maintain written records of such compliance that can be inspected by the City of Moreno Valley upon request.

a) All clearing, grading, earth-moving, and excavation activities shall cease when winds exceed 25 miles per hour.

b) All unpaved roads and disturbed areas shall be watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.

c) The contractor shall ensure that traffic speeds on unpaved roads and areas where soil is exposed are reduced to 15 miles per hour or less.

d) Public streets shall be swept at the end of each workday using a street sweeper meeting SCAQMD Rule 1186.1 if visible soil is carried onto paved public roads.

e) The cargo area of all vehicles hauling soil, sand, or other loose earth materials shall be covered.

MM 4.1-2 Prior to the start of grading, the construction contractor shall post legible, durable, weather-proof signs at the property's frontage with Perris Boulevard, San Michelle Road, and Nandina Avenue stating the name and phone number of an authorized individual to be contacted to resolve dust complaints. Proof of sign posting in the

form of photographs shall be placed on file with the City of Moreno Valley. These signs shall remain posted on the property until grading is complete. All legitimate dust complaints shall be resolved in 24 hours.

The following measure is recommended to reduce the Project's significant near-term construction-related impact associated with the emission of NO_X and NO_X contributions to the SCAB's non-attainment status for O_3. This measure also would further reduce the Project's less than significant impact associated with near-term diesel particulate matter emissions.

MM 4.1-3 Prior to grading permit and building permit issuance, the City shall verify that the following notes are specified on all grading and building plans. Project contractors shall be required to comply with these notes and permit periodic inspection of the construction site by City of Moreno Valley staff to confirm compliance.

a) Mass grading shall be limited to no more than 4.0 acres per day.

b) During construction activity, diesel engines shall not idle in excess of three (3) minutes.

c) All construction-related equipment shall be CARB Certified.

d) Temporary traffic control for construction vehicles entering and exiting the site shall be implemented pursuant to the requirements of the California Manual on Uniform Traffic Control Devices.

e) During construction activity, the operating time of all pieces of off-road diesel-powered equipment shall not exceed a combined total of 75 operating hours per day.

f) Construction-related haul trips entering and existing the site shall occur during non-peak traffic hours.

g) The construction contractor shall encourage construction site employees to rideshare by offering incentives or other inducements.

h) High pressure injectors shall be used on all diesel powered construction equipment over 100 horsepower.

i) All construction-related on-road diesel-powered haul trucks shall be 2007 or newer model year or 2010 engine compliant vehicles.

j) On all construction-related equipment that has a particulate trap, the trap shall be Level 3 CARB certified.

k) Electric-powered construction equipment and tools shall be used when technically feasible.

l) Biodiesel fuel or other alternatives to diesel fuel shall be used to power construction equipment when technically feasible.

m) Construction vehicles shall use the City's designated truck route.

n) Construction parking shall be located and configured to minimize traffic interference on public streets.

o) Import of earth materials and on-site grading activities shall not occur on the same day. No more than 66 loads of earth material (about 2,000 cubic yards) shall be brought to the site in any given day.

The following measure is recommended to reduce the Project's significant near-term construction-related impact associated with the emission of VOCs and VOC contributions to the SCAB's non-attainment status for O_3.

MM 4.1-4 Prior to building permit issuance, the City shall verify that the following note is specified on all building plans. Project contractors shall be required to comply with these notes and maintain written records of such compliance that can be inspected by the City of Moreno Valley upon request.

a) All surface coatings shall consist of Zero-Volatile Organic Compound paints (no more than 150 gram/liter of VOC) and/or be applied with High Pressure Low Volume (HPLV) applications consistent with SCAQMD Rule 1113. Alternatively, building materials may be used that do not require painting or are delivered to the construction site pre-painted.

The following measures are recommended to reduce the Project's significant long-term operational-related impact associated with the emission of NO_X and NO_X contributions to the SCAB's non-attainment status for O_3. These measures also would further reduce the Project's less than significant impact associated with long-term diesel particulate matter emissions.

MM 4.1-5 Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than three (3) minutes; and 3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to occupancy permit issuance, the City shall conduct a site inspection to ensure that the signs are in place.

MM 4.1-6 Prior to the issuance of building permits, the City shall verify that the parking lot striping and security gating plan allows for adequate truck stacking at gates to prevent queuing of trucks outside the property.

MM 4.1-7 Prior to the issuance of occupancy permits, the Project's property owner shall provide documentation to the Planning Division verifying that provisions are included in the building's lease agreement that inform tenants about the availability of: 1) alternatively fueled cargo handling equipment; 2) grant programs for diesel fueled vehicle engine retrofit and/or replacement; 3) designated truck parking locations in the City of Moreno Valley; 4) access to alternative fueling stations in the City of Moreno Valley that supply compressed natural gas (closest station is located on Indian Street, south of Nanina Avenue); and 5) the United States Environmental Protection Agency's SmartWay program.

MM 4.1-8 In the event that the building design is modified to accommodate refrigeration, all loading docks shall be equipped with an electrical hookup to power refrigerated tractor trailers.

4.1.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Thresholds 2 and 3: Significant Direct and Cumulative Impact (Long-Term). As shown in Table 4.1-13, *Emissions Summary of Construction Activities (With Mitigation)*, with incorporation of the mandatory and applicable Project Requirements listed in Subsection 4.1.5 and Mitigation Measures MM 4.1-3 and MM 4.1-4, the Project's near-term construction-related emissions of NO_x and VOCs would be reduced to below the SCAQMD regional thresholds of significance. Accordingly, construction-related emissions would not violate any applicable air quality standard, would not substantially contribute to an existing regional air quality violation, and would not result in a cumulatively considerable contribution to the net increase of any criteria pollutants for which the region is non-attainment. Therefore, near-term construction-related air quality impacts would be reduced to a level below significant.

Table 4.1-13 Emissions Summary of Construction Activities (With Mitigation)

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**51.81**	**89.48**	**62.37**	**0.14**	**53.44**	**5.88**
SCAQMD Regional Threshold	75	100	550	150	150	55
Significant?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Note: Please refer to Appendix A of the Project's Air Quality Impact Analysis (*Technical Appendix B* to this EIR) for the CalEEMod™ output files and additional hand calculations for the estimated emissions.

Although implementation of mandatory and applicable Regulatory Requirements and Mitigation Measures MM 4.1-5 and MM 4.1-6 would reduce long-term operational emissions of NO_x, Project-related operational emissions of NO_x would remain above regional significance thresholds, primarily from mobile source emissions. No other mitigation measures are available that are feasible for the Project Applicant to implement and the City of Moreno Valley to enforce given the City's human and financial capacities. As such, it is concluded that the Project's long-term emissions of NO_x would directly violate SCAQMD air quality standards. In addition, the Project's long-term emissions of NO_x would cumulatively contribute to an existing air quality violation in the SCAB (i.e., O_3 concentrations), as well as cumulatively contribute to the net increase of a criteria pollutant for which the SCAB is non-attainment (i.e., federal and state O_3 concentrations). Accordingly, the Project's long-term emissions of NO_x are concluded to result in a significant and unavoidable impact on both a direct and cumulative basis.

4.2 GREENHOUSE GAS EMISSIONS

This subsection assesses the Project's potential to generate GHG emissions that could contribute to GCC and its associated environmental effects. The analysis in this subsection is based in part on information contained in the report titled, "First Inland Logistics II GHG Analysis," prepared by Urban Crossroads, Inc. and dated November 14, 2012, and included as *Technical Appendix D* to this EIR (Urban Crossroads, 2012c).

4.2.1 EXISTING CONDITIONS

A. Introduction to Global Climate Change

Global climate change (GCC) is defined as the change in average meteorological conditions on the Earth with respect to temperature, precipitation, and storms. GCC is a controversial environmental issue in the United States, and much debate exists within the scientific community about whether or not GCC is occurring naturally or as a result of human activity. Some data suggests that GCC has occurred over the course of thousands or millions of years. These historical changes to the Earth's climate have occurred naturally without human influence, as in the case of an ice age. However, many scientists believe that the climate shift taking place since the industrial revolution (1900) is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of greenhouse gasses (GHGs) in the Earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. Many scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years. (Urban Crossroads, 2012c, p. 6)

Man-made global warming, if it does exist, cannot be solved by the actions of California or the actions of the industrialized world alone due to the serious and undeniable projected increases in emissions in the developing world. Regardless, an individual project like the proposed Project evaluated in this EIR cannot generate enough GHG emissions to effect a discernible change in global climate. The proposed Project may participate in the potential for GCC by its incremental contribution of GHG emissions combined with all other sources of GHGs, which when taken together constitute potential influences on the global climate. (Urban Crossroads, 2012c, p. 6)

B. Greenhouse Gases

Emissions of CO_2, CH_4, and N_2O are the focus of evaluation in this subsection because these gases are the primary contributors to GCC from development projects. Although other substances such as fluorinated gases also contribute to GCC, sources of fluorinated gases are not well defined and no accepted emissions factors or methodology exist to accurately calculate these gases. (Urban Crossroads, 2012c, p. 9)

GHGs have varying global warming potential (GWP) values; GWP values represent the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a GWP of 1. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.2-1, *Global Warming Potentials and Atmospheric Lifetime of Select GHGs*. As shown in the table below, GWPs range from 1 for CO_2 to 23,900 for sulfur hexafluoride (SF_6).

Table 4.2-1 Global Warming Potentials and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100 year time horizon)
Carbon Dioxide	50-200	1
Methane	12 ± 3	21
Nitrous Oxide	120	310
HFC-23	264	11,700
HFC-134a	14.6	1,300
HFC-152a	1.5	140
PFC: Tetrafluoromethane (CH_4)	50,000	6,500
PFC: Hexafluoroethane (C_2F_6)	10,000	9,200
Sulfur Hexafluoride (SF_6)	3,200	23,900

Source: U.S. EPA 2006 (http://www.epa.gov/nonco2/econ-inv/table.html)

Provided below is a description of the various gases that contribute to GCC. For more information about these gasses and their associated human health effects, refer to *Technical Appendix D*, pages 10-13 and the reference sources cited therein.

- Water Vapor: Water vapor (H_20) is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change.

  As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown in the scientific community because there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up). There are no human health effects from water vapor itself; however, when some pollutants come in contact with water vapor, they can dissolve and the water vapor can then act as a pollutant-carrying agent.

- Carbon Dioxide: Carbon dioxide (CO_2) is an odorless and colorless GHG that is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic

matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Manmade sources include: the burning of coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases CO_2 emissions has increased dramatically in scale and distribution. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of manmade sources. Exposure to CO_2 in high concentrations can cause human health effects, but outdoor levels are not high enough to adversely affect human health.

- Methane: Methane (CH_4) is an extremely effective absorber of radiation, though its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs. Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropocentric sources include fossil-fuel combustion and biomass burning. No health effects are known to occur from exposure to methane.

- Nitrous Oxide: Nitrous oxide (N_2O), also known as laughing gas, is a colorless GHG. Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage). Concentrations of nitrous oxide also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant (i.e., in whipped cream bottles). It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. Nitrous oxide can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction.

- Chlorofluorocarbons: Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source, but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

- Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Prior to 1990, the

only substantial emissions were of HFC-23. HFC-134a emissions are increasing due to its use as a refrigerant. The U.S. Environmental Protection Agency (EPA) estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each; and that concentrations of HFC-152a are about 1 ppt. No health effects are known to result from exposure to HFCs, which are manmade for applications such as automobile air conditioners and refrigerants.

- Perfluorocarbons: The two primary sources of perfluorocarbons (PFCs) are aluminum production and semiconductor manufacture. PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The U.S. EPA estimates that concentrations of CF_4 in the atmosphere are over 70 ppt. No health effects are known to result from exposure to PFCs.

- Sulfur Hexafluoride: Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The U.S. EPA indicates that concentrations in the 1990s were about 4 ppt. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

C. GHG Emissions Inventories

❑ Global

Worldwide anthropogenic (man-made) GHG emissions are tracked by the Intergovernmental Panel on Climate Chang (IPPC) for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Man-made GHG emissions data for Annex I nations are available through 2009. Man-made GHG emissions data for Non-Annex I nations are available through 2007. For the Year 2009 the sum of these emissions totaled approximately 40,084 million metric tons of CO_2 equivalent ($MMTCO_2e$). Emissions from the top five countries and the European Union accounted for approximately 65 percent of the total global GHG emissions, according to the most recently available data (see Table 4.2-2, *Top GHG Producer Countries and the European Union*). The GHG emissions in more recent years may differ from the inventories presented in Table 4.2-2; however, the data is representative of currently available inventory data. (Urban Crossroads, 2012c, pp. 6-7)

❑ United States

As noted in Table 4.2-2, the United States, as a single country, was the number two producer of GHG emissions in 2009. The primary GHG emitted by human activities in the United States was CO_2, representing approximately 83% of total GHG emissions. Carbon dioxide from fossil fuel combustion, the largest source of US GHG emissions, accounted for approximately 78% of the GHG emissions. (Urban Crossroads, 2012c, p. 7)

Table 4.2-2 Top GHG Producer Countries and the European Union

Emitting Countries	GHG Emissions (MMT CO_2e)
China	6,703
United States	6,608
European Union (27 member countries)	8,338
Russian Federation	2,159
India	1,410
Japan	1,209
Total	**26,427**

Source: (Urban Crossroads, 2012c, Table 2-1)

❑ State of California

CARB compiles GHG inventories for the State of California. Based upon the 2008 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2008 GHG emissions inventory, California emitted 474 $MMTCO_2e$ including emissions resulting from imported electrical power in 2008. Based on the CARB inventory data and GHG inventories compiled by the World Resources Institute, California's total statewide GHG emissions rank second in the United States (Texas is number one) with emissions of 417 $MMTCO_2e$ excluding emissions related to imported power.

D. Effects of Climate Change in California

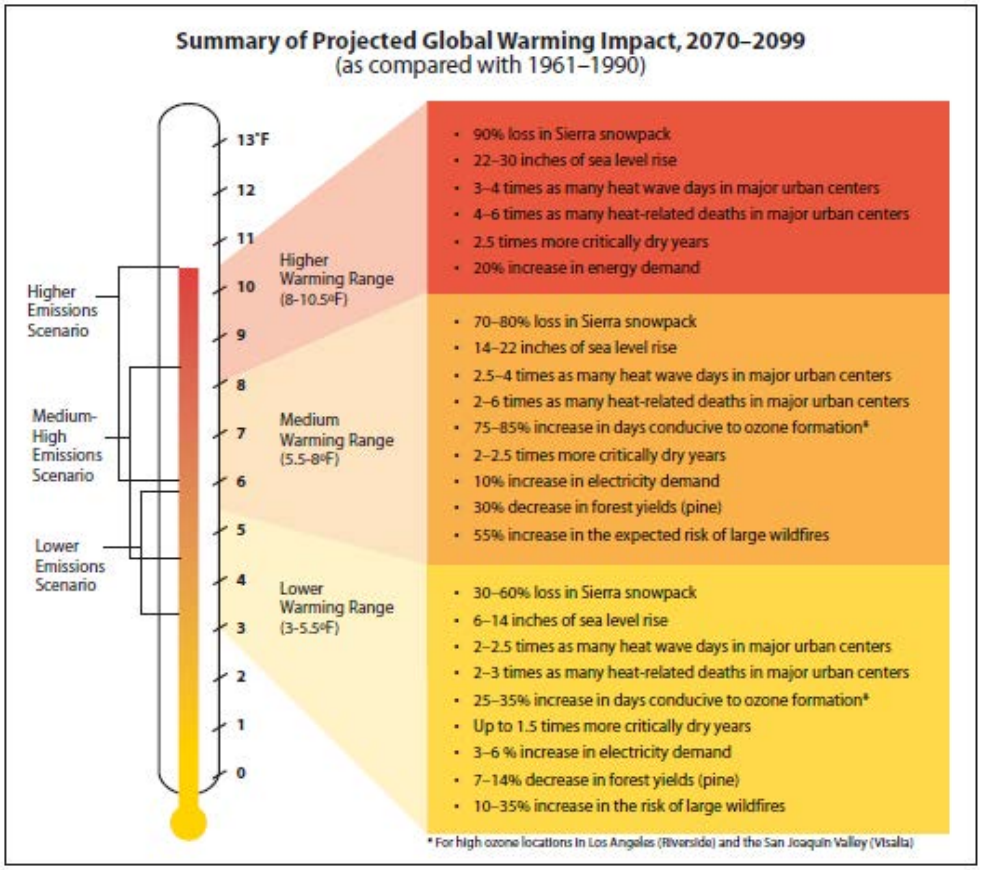
The California Environmental Protection Agency (CalEPA) published a report titled "Scenarios of Climate Change in California: An Overview" (Climate Scenarios report) in February 2006 (California Climate Change Center 2006), that is generally instructive about the statewide impacts of global warming. The Climate Scenarios report uses a range of emissions scenarios developed by the Intergovernmental Panel on Climate Change (IPCC) to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st century: lower warming range (3.0-5.5^{o}F); medium warming range (5.5-8.0^{o}F); and higher warming range (8.0-10.5^{o}F). The Climate Scenarios report then presents an analysis of future climate in California under each warming range, that while uncertain, present a picture of the impacts of GCC trends in California. (Urban Crossroads, 2012c, p. 13)

In addition, most recently on August 5, 2009, the State's Natural Resources Agency released a public review draft of its "California Climate Adaptation Strategy" report that details many vulnerabilities arising from climate change with respect to matters such as temperature extremes, sea level rise, wildfires, floods and droughts and precipitation changes. This report responds to the Governor's Executive Order S-13-2008 that called on state agencies to develop California's strategy to identify and prepare for expected climate impacts. (Urban Crossroads, 2012c, p. 14)

According to the reports, substantial temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions, with the severity of the impacts

depending on the actual future emissions of GHGs and associated warming. Figure 4.2-1, *Summary of Projected Global Warming Impact (2070-2099)*, presents the potential impacts of global warming.

Figure 4.2-1 Summary of Projected Global Warming Impact (2070-2099)



Source: (Urban Crossroads, 2012c, Figure 1)

Under the emissions scenarios of the Climate Scenarios and California Climate Adaption Strategy reports, the impacts of global warming in California have the potential to include, but are not limited to, the following areas. For more information, refer to *Technical Appendix D*, pages 13-17 and the reference sources cited therein.

❑ Public Health

The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in droughts and food shortages in some areas. (Urban Crossroads, 2012c, p. 17)

❑ Air Quality/General Thermal Effects

According to CalEPA, higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25% to 35% under the lower warming range to 75% to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become difficult to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become more frequent if GHG emissions are not substantially reduced. (Urban Crossroads, 2012c, p. 14)

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat. (Urban Crossroads, 2012c, p. 14)

❑ Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages. Additionally, if temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70% to 90%. The loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply. (Urban Crossroads, 2012c, p. 15)

❑ Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. California farmers could possibly lose as much as 25% of the water supply they need. Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone (O_3) pollution, which makes plants more susceptible to disease and pests and interferes with plant growth. Faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Continued

GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates. (Urban Crossroads, 2012c, pp. 15-16)

❑ Forests and Landscapes

Climate change has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. However, because wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90 percent due to decreased precipitation. Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60% to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC. (Urban Crossroads, 2012c, p. 16)

❑ Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with salt water, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches. (Urban Crossroads, 2012c, pp. 16-17)

E. Regulatory Setting

Below is an account of the regulatory programs, policies, laws, and regulations that are applicable to GHG emissions and GCC in California. For more information, refer to *Technical Appendix D*, pages 19-30 and the reference sources cited therein.

❑ International Regulation and the Kyoto Protocol

In 1988, the United Nations created the IPCC to provide scientific information regarding climate change to policymakers. The IPCC does not conduct research itself, but rather compiles information from a variety of sources into reports regarding climate change and its impacts. The IPCC has thereafter periodically released reports on climate change, and in 2007 released its Fourth Assessment Report ("AR4"), which concluded that "[w]arming of the climate system is unequivocal," and that "[m]ost of the observed increase in global average temperatures since the mid-20th century is very likely due to the observed increase in anthropogenic GHG concentrations." However, since 2007, AR4 has been the subject of a variety of reports and studies which have discredited its findings. Flaws have been identified and show that the IPCC was careless in the ways in which it compiled the report and the methods in which it continues to promote the theory of man-made or anthropogenic climate change. As a result, the report lacks scientific reliability and does not provide credible evidence to support the theory that GCC is occurring a result of human activity. Also, a scientific consensus does not exist on whether the Earth is even warming, in part due to defective data collection methods and recent reports of stabilization or cooling. Although most scientists and researchers acknowledge that there may have been some warming in the past 100

years, this does not confirm the anthropogenic theory promoted by the IPCC. Rather, there are other theories that may better explain what the Earth is experiencing, such as solar activity.

Regardless, in 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling GHG emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The Plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Kyoto protocol are met, global GHG emissions could be reduced an estimated five (5) percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the United States is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the United States is not bound by the Protocol's commitments. Since the United States declined to ratify the Kyoto Protocol, it has become increasingly clear that global climate change, if it exists and is anthropogenic, cannot be addressed without limiting greenhouse gas emissions from developing, as well as developed countries. According to many sources, China has already surpassed the United States as the world's largest GHG emitter.

❑ Federal Regulation and the Clean Air Act

Coinciding with a 2009 meeting in Copenhagen, on December 7, 2009, the U.S. EPA issued an Endangerment Finding under Section 202(a) of the Clean Air Act, opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the Clean Air Act. To date, the U.S. EPA has not promulgated regulations on GHG emissions, but it has already begun to develop them.

Previously the EPA had not regulated GHGs under the Clean Air Act because it asserted that the Act did not authorize it to issue mandatory regulations to address GCC and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In Massachusetts v. Environmental Protection Agency et al. (127 S. Ct. 1438 (2007)), however, the U.S. Supreme Court held that GHGs are pollutants under the Clean Air Act and directed the U.S. EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before the U.S. Congress adopts major climate change legislation. The U.S. EPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress.

❑ Title 24 Standards

Although GCC did not become an international concern until the 1980s, efforts to reduce energy consumption began in California in response to the oil crisis in the 1970s, resulting in the incidental reduction of GHG emissions. In order to manage the state's energy needs and promote energy efficiency, Assembly Bill (AB) 1575 created the California Energy Commission (CEC) in 1975.

The CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The latest revisions were adopted in 2008 and became effective on January 1, 2010.

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

❑ California Assembly Bill No. 1493 (AB 1493)

AB 1493 required the California Air Resources Board (CARB) to develop and adopt GHG emission standards for automobiles. The Legislature declared in AB 1493 that global warming was a matter of increasing concern for public health and environment in California. Further, the legislature stated that technological solutions to reduce GHG emissions would stimulate the California economy and provide jobs.

To meet the requirements of AB 1493, CARB approved amendments to the California Code of Regulations (CCR) adding GHG emission standards to California's existing motor vehicle emission standards in 2004. Amendments to CCR Title 13 Sections 1900 (CCR 13 1900) and 1961 (CCR 13 1961) and adoption of Section 1961.1 (CCR 13 1961.1) require automobile manufacturers to meet fleet average GHG emission limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes beginning with the 2009 model year. Emission limits are further reduced each model year through 2016.

In December 2004 a group of car dealerships, automobile manufacturers, and trade groups representing automobile manufacturers filed suit against CARB to prevent enforcement of CCR 13 1900 and CCR 13 1961 as amended by AB 1493 and CCR 13 1961.1 (*Central Valley Chrysler-Jeep et al. v. Catherine E. Witherspoon, in her official capacity as Executive Director of the California Air Resources Board, et al.*). The suit, heard in the U.S. District Court for the Eastern District of California, contended that California's implementation of regulations that in effect regulate vehicle fuel economy violates various federal laws, regulations, and policies. In January 2007, the judge hearing the case accepted a request from the State Attorney General's office that the trial be postponed until a decision is reached by the U.S. Supreme Court on a separate case addressing GHGs. In the Supreme Court Case, *Massachusetts vs. EPA*, the primary issue in question is whether

the federal CAA provides authority for U.S. EPA to regulate CO_2 emissions. In April 2007, the U.S. Supreme Court ruled in Massachusetts' favor, holding that GHGs are air pollutants under the CAA. On December 11, 2007, the judge in the Central Valley Chrysler-Jeep case rejected each plaintiff's arguments and ruled in California's favor. On December 19, 2007, the U.S. EPA denied California's waiver request. California filed a petition with the Ninth Circuit Court of Appeals challenging USEPA's denial on January 2, 2008.

President Obama's administration subsequently directed the U.S. EPA to re-examine their decision. On May 19, 2009, challenging parties, automakers, the State of California, and the federal government reached an agreement on a series of actions that would resolve these current and potential future disputes over the standards through model year 2016. In summary, the U.S. EPA and the U.S. Department of Transportation agreed to adopt a federal program to reduce GHGs and improve fuel economy, respectively, from passenger vehicles in order to achieve equivalent or greater GHG benefits as the AB 1493 regulations for the 2012-2016 model years. Manufacturers agreed to ultimately drop current and forego similar future legal challenges, including challenging a waiver grant, which occurred on June 30, 2009. The State of California committed to (1) revise its standards to allow manufacturers to demonstrate compliance with the fleet-average GHG emission standard by "pooling" California and specified State vehicle sales; (2) revise its standards for 2012–2016 model year vehicles so that compliance with U.S. EPA-adopted GHG standards would also comply with California's standards; and (3) revise its standards, as necessary, to allow manufacturers to use emissions data from the federal Corporate Average Fuel Economy (CAFE) program to demonstrate compliance with the AB 1493 regulations. Both of these programs are aimed at light-duty auto and light-duty trucks.

❑ Executive Order S-3-05

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra Nevada's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total GHG emission targets. Specifically, emissions are to be reduced to the 1990 level by 2020, and to 80% below the 1990 level by 2050. The Executive Order directed the Secretary of CalEPA to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary also is required to submit biannual reports to the Governor and state Legislature describing: (1) progress made toward reaching the emission targets; (2) impacts of global warming on California's resources; and (3) mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the Secretary of the CalEPA created a Climate Action Team (CAT) made up of members from various state agencies and commission. CAT released its first report in March 2006. The report proposed to achieve the targets by building on voluntary actions of California businesses, local government and community actions, as well as through state incentive and regulatory programs.

❑ California Assembly Bill 32 (AB 32)

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Climate Solutions Act of 2006. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by the year 2020. This reduction will be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary

sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

In November 2007, CARB completed its estimates of 1990 GHG levels. Net emission 1990 levels were estimated at 427 million metric tons (MMTs) (emission sources by sector were: transportation – 35%; electricity generation – 26%; industrial – 24%; residential – 7%; agriculture – 5%; and commercial – 3%). Accordingly, 427 MMTs of CO_2 equivalent was established as the emissions limit for 2020. For comparison, CARB's estimate for baseline GHG emissions was 473 MMT for 2000 and 532 MMT for 2010. "Business as usual" conditions (without the 30% reduction to be implemented by CARB regulations) for 2020 were projected to be 596 MMTs.

On December 11, 2008, CARB adopted a scoping plan to reduce GHG emissions to 1990 levels. Table 4.2-3, *Scoping Plan GHG Reduction Measures Toward 2020 Target*, shows the proposed reductions from regulations and programs outlined in the Scoping Plan. While local government operations were not accounted for in achieving the 2020 emissions reduction, local land use changes are estimated to result in a reduction of 5 MMTs of CO_2e, which is approximately 3% of the 2020 GHG emissions reduction goal. In recognition of the critical role local governments will play in successful implementation of AB 32, CARB is recommending GHG reduction goals of 15% of 2006 levels by 2020 to ensure that municipal and community-wide emissions match the state's reduction target. According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2% through land use planning, resulting in a potential GHG reduction of 2 MMTs of CO_2e (or approximately 1.2 percent of the GHG reduction target).

❑ California Senate Bill No. 1368 (SB 1368)

In 2006, the State Legislature adopted Senate Bill 1368 (SB 1368), which was subsequently signed into law by the Governor. SB 1368 directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. Due to the carbon content of its fuel source, a coal-fired plant cannot meet this standard because such plants emit roughly twice as much carbon as natural gas, combined cycle plants. Accordingly, the new law will effectively prevent California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. Thus, SB 1368 will lead to

Table 4.2-3 Scoping Plan GHG Reduction Measures Toward 2020 Target

Recommended Reduction Measures	*Reductions Counted toward 2020 Target of 169 MMT CO_2e*	*Percentage of Statewide 2020 Target*
Cap and Trade Program and Associated Measures		
California Light-Duty Vehicle GHG Standards	31.7	19%
Energy Efficiency	26.3	16%
Renewable Portfolio Standard (33 percent by 2020)	21.3	13%
Low Carbon Fuel Standard	15	9%
Regional Transportation-Related GHG Targets1	5	3%
Vehicle Efficiency Measures	4.5	3%
Goods Movement	3.7	2%
Million Solar Roofs	2.1	1%
Medium/Heavy Duty Vehicles	1.4	1%
High Speed Rail	1.0	1%
Industrial Measures	0.3	0%
Additional Reduction Necessary to Achieve Cap	34.4	20%
Total Cap and Trade Program Reductions	146.7	87%
Uncapped Sources/Sectors Measures		
High Global Warming Potential Gas Measures	20.2	12%
Sustainable Forests	5	3%
Industrial Measures (for sources not covered under cap and trade program)	1.1	1%
Recycling and Waste (landfill methane capture)	1	1%
Total Uncapped Sources/Sectors Reductions	27.3	16%
Total Reductions Counted toward 2020 Target	174	100%
Other Recommended Measures – Not Counted toward 2020 Target		
State Government Operations	1.0 to 2.0	1%
Local Government Operations	To Be Determined2	NA
Green Buildings	26	15%
Recycling and Waste	9	5%
Water Sector Measures	4.8	3%
Methane Capture at Large Dairies	1	1%
Total Other Recommended Measures – Not Counted toward 2020 Target	42.8	NA

Source: CARB. 2008, MMTons CO_2e: million metric tons of CO_2e 1 Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target. 2 According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO_2e (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 Target

dramatically lower GHG emissions associated with California energy demand, as SB 1368 will effectively prohibit California utilities from purchasing power from out of state producers that cannot satisfy the EPS standard required by SB 1368.

❑ Senate Bill 97 (SB 97)

Pursuant to the direction of SB 97, the California Office of Planning and Research (OPR) released preliminary draft CEQA Guideline amendments for GHG emissions on January 8, 2009, and submitted its final proposed guidelines to the Secretary for Natural Resources on April 13, 2009. The Natural Resources Agency adopted the Guideline amendments and they became effective on March 18, 2010.

The adopted CEQA Guidelines specify that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or

performance based standards. CEQA Guideline §15064.4(a) specifically states that "a lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use…; or (2) rely on a qualitative analysis or performance based standards."

CEQA emphasizes that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts (see CEQA Guidelines §15130[f]). CEQA Guidelines §15064.4(b) provides direction for lead agencies for assessing the significance of impacts of GHG emissions. The CEQA Guidelines do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate or estimate the amount of GHG emissions resulting from a project." The Guidelines encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based upon substantial evidence.

❑ Executive Order S-01-07

On January 18, 2007 California Governor Arnold Schwarzenegger, through Executive Order S-01-07, mandated a statewide goal to reduce the carbon intensity of California's transportation fuel by at least ten percent by 2020. The order also requires that a California-specific Low Carbon Fuel Standard (LCFS) be established for transportation fuels.

❑ Senate Bills 1078 and 107 and Executive Order S-14-08

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20% of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008 Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Energy Standard to 33% renewable power by 2020.

❑ Senate Bill 375 (SB 375)

SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPO's regional transportation plan. CARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight (8) years but can be updated every four (4) years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB also is charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects are not be eligible to received programmed funding.

❑ CARB's Preliminary Draft Staff Proposal for Interim Significance Thresholds

Separate from its Scoping Plan approved in December of 2008, CARB issued a Staff Proposal in October 2008, as its first step toward developing recommended statewide interim thresholds of significance for GHGs that may be adopted by local agencies for their own use. CARB staff's

objective in this proposal is to develop a threshold of significance that will result in the vast majority (approximately 90% statewide) of GHG emissions from new industrial projects being subject to CEQA's requirement to impose feasible mitigation. The proposal does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that, collectively, are responsible for substantial GHG emissions – specifically, industrial, residential, and commercial projects. CARB is developing these thresholds in these sectors to advance climate objectives, streamline project review, and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the state. These draft thresholds are under revision in response to comments. There is currently no timetable for finalized thresholds at this time.

As currently proposed by CARB, the threshold consists of a quantitative threshold of 7,000 metric tons (MT) of CO_2e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. These performance standards have not yet been adopted and do not apply to projects in which CARB is not the lead agency. Further, CARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines. The proposed Project evaluated in this EIR does not propose or require these types of uses.

❑ South Coast Air Quality Management District Recommendations for Significance Thresholds

In April 2008, the South Coast Air Quality Management District (SCAQMD), in order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, convened a "GHG CEQA Significance Threshold Working Group." The goal of the working group is to develop and reach consensus on an acceptable CEQA significance threshold for GHG emissions that would be utilized on an interim basis until CARB (or some other state agency) develops statewide guidance on assessing the significance of GHG emissions under CEQA.

Initially, SCAQMD staff presented the working group with a significance threshold that could be applied to various types of projects—residential; non-residential; industrial; etc. However, the threshold is still under development. In December 2008, staff presented the SCAQMD Governing Board with a significance threshold for stationary source projects where it is the lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) as a screening numerical threshold for stationary sources.

In September 2010, the Working Group released additional revisions that recommended a threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects. Additionally the working group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area-wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. The SCAQMD has not established a timeline for formal consideration of these thresholds.

The SCAQMD also adopted Rules 2700, 2701, and 2702 that address GHG reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the proposed Project.

- **City of Moreno Valley**

On October 9, 2012, the Moreno Valley City Council approved an Energy Efficiency and Climate Action Strategy and related Greenhouse Gas Analysis. The Energy Efficiency and Climate Action Strategy document identifies potential programs and policies to reduce overall City energy consumption and increase the use of renewable energy. The majority of the policies are directed at municipal operations of the City, but the document also contains recommended policies for the community at large (including private development projects). These recommended policies include but are not limited to: energy efficiency, water use reduction, trip reduction, solid waste diversion, and educational policies.

The proposed Project is required to comply with several Project Requirements as outlined in Subsection 4.2.5, below. As such, the Project would not impede or conflict with implementation of the City's Energy Efficiency and Climate Action Strategy and would have a less than significant impact.

4.2.2 BASIS FOR DETERMINING SIGNIFICANCE

In order to assess the significance of a proposed Project's environmental impacts it is necessary to identify quantitative or qualitative thresholds which, if exceeded, would constitute a finding of significance. As discussed above in Subsection 4.2.1, while Project-related GHG emissions can be estimated, the direct impacts of such emissions on GCC cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect global climate.

AB 32 states, in part, that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would not result in a direct impact to global warming; rather, Project-related impacts to GCC only could be potentially significant on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively considerable way.

The CEQA Guidelines indicate that a project would result in a significant impact on climate change if a project were to:

1. *Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or*

2. *Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.*

AB 32 is the primary plan, policy or regulation adopted in the State of California to reduce GHG emissions; thus, the proposed Project would have a significant cumulative impact associated with GHG emissions if it does not comply with the regulations developed under AB 32. For purposes of analysis within this subsection, the significance of the proposed Project's GHG emissions impacts is based upon whether or not the Project can demonstrate compliance with the CARB Scoping Plan prepared in response to California Assembly Bill 32 (AB 32) and the State of California's Climate

Action Team Report (2006), prepared in response to the California Governor's Executive Order S-3-05. This approach is consistent with past practice in the City of Moreno Valley.

4.2.3 IMPACT ANALYSIS

A. Methodology for Estimating Project-Related GHG Emissions

CEQA Guidelines §15064.4(b)(1) states that a lead agency may use a model or methodology to quantify GHG emissions associated with a project. On February 3, 2011, the SCAQMD released the California Emissions Estimator Model (CalEEMod™). The purpose of this model is to estimate air quality and GHG emissions from direct and indirect sources and quantify applicable air quality and GHG reductions achieved from mitigation measures. As such, the February 2011 CalEEMod™ was used for estimating Project-related emissions. The CalEEMod™ model includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water. (Urban Crossroads, 2012c, p. 33)

A full life-cycle analysis (LCA) is not included in the Project's GHG Analysis (*Technical Appendix D*) due to the lack of consensus guidance on LCA methodology. Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the project development and infrastructure) depends on emission factors or econometric factors that are not well established for all processes. At this time a LCA, would be extremely speculative and thus was not prepared. (Urban Crossroads, 2012c, p. 33)

B. Methodology for Estimating Project-Related Construction Emissions

Construction activities associated with the proposed Project would result in emissions of CO_2 and CH_4 from the following construction activities:

- Demolition
- Site Preparation
- Grading
- Paving
- Building Construction
- Architectural Coatings (Painting)
- Construction Workers Commuting

Based on information about the Project's anticipated construction characteristics and schedule as supplied by the Project Engineer and Project Applicant (Cochran, 2012a), the approximate construction scheduling for each phase of construction was input into the CalEEMod™ model and defaults for all other assumptions were utilized. A summary of the assumptions used in the construction modeling is provided below.

The Project site is currently occupied with an 8.4-acre truck parking yard. This parking area and associated surface improvements would be demolished to construct the proposed Project. The Project Applicant plans to demolish the asphaltic and concrete surfaces, which would be pulverized and stockpiled onsite for subsequent use in Project construction activities. The Project Applicant estimates that demolition activities would occur over a period of two (2) weeks but the air quality analysis conservatively assumes that demolition activates would occur over three (3) working weeks.

The duration of construction activity and associated equipment was estimated based on construction of similar projects in the City of Moreno Valley, CalEEMod™ model defaults, and information provided by the Project Applicant. Refer to specific detailed modeling inputs/outputs contained in Appendix "A" of *Technical Appendix D* to this EIR. A detailed summary of construction equipment assumptions by phase is provided in Table 4.1-5 of Subsection 4.1, Air Quality.

In accordance with SCAQMD recommendations, the Project's construction phase GHG emissions were quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by the Project life (i.e., 30 years) then adding that number to the annual operational phase GHG emissions. Accordingly, within this analysis construction-source emissions were amortized over a 30 year period and added to the annual operational phase GHG emissions. (Urban Crossroads, 2012c, p. 34)

For purposes of modeling the Project's GHG emissions, demolition is expected to occur within the month of January 2013; Site Preparation is expected to occur from January 2013 through February 2013; Grading activities are expected to occur within the month of February 2013; Building Construction is expected to occur from February 2013 through October 2013; Paving is expected to occur from October 2013 through November 2013; and Architecture Coatings are expected to occur from November 2013 through December 2013. This construction schedule represents a "worst-case" analysis scenario; should construction occur any time after these respective dates, construction-related emissions would decrease because emission factors for construction equipment decrease as the analysis year increases due to increasingly stringent regulatory requirements. (Urban Crossroads, 2012c, p. 34)

Construction emissions for construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction and earth materials delivered to the Project site), were estimated based on information from the Project Applicant and the CalEEMod™ defaults. (Urban Crossroads, 2012c, p. 34)

C. Methodology for Estimating Project-Related Operational Emissions

Operational activities associated with the proposed Project would result in emissions of CO_2, CH_4, and N_2O from the following primary sources, which are discussed below:

- Building Energy Use (Combustion Emissions Associated with Natural Gas and Electricity)
- Water Supply, Treatment and Distribution
- Solid Waste
- Vehicles

o *Building Energy Use*

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the off-site generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Unless otherwise noted, CalEEMod™ default parameters were used. (Urban Crossroads, 2012c, pp. 35-36)

- *Water Supply, Treatment and Distribution*

Indirect GHG emissions result from the off-site production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. The Project's water demand was estimated based on data available from the Eastern Municipal Water District (EMWD) for similar developments projects. The Project is estimated to result in a demand for approximately 12,110 gallons of potable water per day (or approximately 13.6 acre-feet per year). (Urban Crossroads, 2012c, p. 36)

- *Solid Waste*

The Project would result in the generation and disposal of solid waste. A large percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. Using solid waste generation rates for light industrial/warehouse uses reported by CalRecycle24, GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by the CalEEMod™. (Urban Crossroads, 2012c, p. 36)

- *Vehicles*

GHG emissions also would result from mobile sources associated with the Project. These mobile source GHG emissions are generated by typical daily operation of motor vehicles by visitors, employees, and customers. For detailed information about the assumptions and methodology used to estimate GHG emission, refer to *Technical Appendix D*, pp. 6-41, and the reference sources cited therein.

Trip characteristics from the Project's Traffic Impact Analysis (*Technical Appendix E* to this EIR) were used to estimate Project-related operational vehicular emissions. The same methodology was applied as described in EIR Subsection 4.1, Air Quality. In summary, the actual number of passenger cars (including light trucks) and heavy trucks are used in the analysis instead of PCEs as used in the traffic report. The vehicle fleet mix, in terms of actual vehicles, was derived from the traffic study with the total traffic generation in vehicles calculated at 576 per day. The operational emissions evaluation is based on a conservative analysis year of 2013 (Project buildout). This analysis year was selected as it is the most conservative from an emissions generating standpoint because GHG emissions from vehicles would decrease as the analysis year increases due to implementation of regulatory requirements and vehicle fleet turnover contained in the EMFAC model. (Urban Crossroads, 2012c, p. 39)

As discussed in EIR Subsection 4.1, Air Quality, air emissions (including GHG emissions) calculated for the proposed Project and disclosed in this EIR is likely overstated because no credit for, or reduction in, emissions is assumed based on diversion of existing trips. (Urban Crossroads, 2012c, p. 39). For passenger car trips, a one-way trip length of 17 miles was assumed as contained in the SCAQMD CEQA Handbook (SCAQMD 1993) for Riverside County for the year 2010 (this trip length was used in lieu of the CalEEMod™ model defaults because it is more conservative). For heavy duty trucks, an average trip length of 61 miles is used. The resulting weighted average trip

length of 40.76 miles was entered into the CalEEMod™ model calculations. (Urban Crossroads, 2012c, p. 41). For more information, tables calculating percentage of trips by vehicle class are shown in *Technical Appendix D*.

Threshold 1:	***Would the proposed Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?***
Threshold 2:	***Would the proposed Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?***

A summary of the proposed Project's projected annual operational GHG emissions, including the amortized construction emissions, is provided in Table 4.2-4, *Total Annual Project GHG Emissions*. The operational GHG emissions for the Project, including the amortized construction emissions, are estimated to be 10,632.09 MT per year. (Urban Crossroads, 2012c, p. 42)

Table 4.2-4 Total Annual Project GHG Emissions

	Emissions (metric tons per year)			
Emission Source	**CO_2**	**CH_4 (CO_2E)**	**N_2O(CO_2E)**	**Total CO_2E**
Annual construction-related emissions amortized over 30 years	24.96	0.002	--	25.00
Energy	397.18	0.02	0.01	399.66
Mobile Sources	8,216.61	0.20	--	8,220.79
Waste	877.21	51.84	--	1,965.87
Water Usage	16.79	0.14	--	20.77
Total CO_2E (All Sources)		**10,632.09**		

Source: CalEEMod™ model output, See Appendix "A" of EIR *Technical Appendix D* for detailed model outputs.
Note: Totals obtained from CalEEMod™ and may not total 100% due to rounding.

As indicated in §15064(b) of the State CEQA Guidelines, the determination of significance of GHGs is not "ironclad;" rather, the "determination of whether a project may have a significant effect on the environment calls for a "careful judgment" by the lead agency (City of Moreno Valley) "based on the extent possible on scientific and factual data." The City of Moreno Valley has not adopted a numeric threshold of significance for emissions of GHGs.

As previously noted, CARB does not have an adopted numerical threshold of significance for projects like the proposed Project. Further, CARB's current proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants or uses that utilize combustion engines, and does not address mobile source emissions. Similarly, the SCAQMD thresholds are currently in draft form and are not adopted. Nevertheless, comparison of the GHG emissions from the Project's area sources (construction, energy, waste, and water usage) indicates that the Project's emissions from such sources would be well below the proposed CARB and SCAQMD thresholds for stationary sources. With regard to GHG emissions from mobile sources, as discussed above, the estimation of the Project's impact on mobile source GHG emissions is highly speculative, because the methodology to quantify mobile source GHG emissions assumes that all of the vehicle trips to and from the Project site would be new, rather than

redistributed vehicle trips from other areas. No methods or models exist to estimate the Project's net contribution to regional or global vehicle miles traveled. Because the estimation of the Project's contribution to mobile source GHG emissions is highly speculative, and based on the absence of applicable thresholds for mobile source GHG emissions, use of a quantitative threshold of significance is not meaningful. Accordingly, a qualitative analysis is used to determine significance, based on consistency with regional and state GHG plans.

As previously indicated and consistent with past practice in the City of Moreno Valley, the significance of the Project's GCC impacts is based upon whether or not the Project can demonstrate compliance with the CARB Scoping Plan and the State of California's Climate Action Team Report (2006). The analysis below sets out the factual basis for the City's determination regarding the effect of Project-related GHGs. The analysis is specific to this Project, and may not necessarily apply to other projects within the City of Moreno Valley.

❑ Consistency with the CARB Scoping Plan

AB 32 requires California to reduce its GHG emissions by approximately 29% below business as usual. CARB identified reduction measures to achieve this goal as set forth in the CARB Scoping Plan. Thus, projects that are consistent with the CARB Scoping Plan are also consistent with the 29% reduction below business as usual required by AB 32.

The proposed Project would generate GHG emissions from a variety of sources which would all emit CO_2, CH_4 and N_2O. GHGs could also be indirectly generated by incremental electricity consumption and waste generation from the proposed Project.

Table 4.2-5, *Recommended Actions for Climate Change Proposed Scoping Plan*, presents the 39 Recommended Actions (qualitative measures) identified to date by CARB in its Climate Change Proposed Scoping Plan. Of the 39 measures identified, those that would be considered to be applicable to the Project would primarily be those actions related to transportation, electricity and natural gas use, green building design and industrial uses. Table 4.2-5 identifies which CARB Recommended Actions apply to the Project, and of those, whether the Project is consistent therewith.

Consistency of the Project with the Scoping Plan measures is discussed below by each source-type. It also should be noted that certain measures and enforcement actions listed below are beyond the control of the Project Applicant and the City of Moreno Valley. Notwithstanding, implementation and enforcement of these measures by the State or other responsible entity will act to reduce area-wide GHG emissions.

o *Transportation*

CARB's Scoping Plan identifies nine transportation-related recommended actions. Action T-1 concerns improvements to light-duty vehicle technology for the purposes of reducing GHG emissions. This action focuses on legislating improved controls for vehicle manufacturers and would not generally be considered applicable to the proposed Project. Implementation of the Pavley

Table 4.2-5 Recommended Actions for Climate Change Proposed Scoping Plan

ID #	Sector	Strategy Name	Applicable to Project?	Will Project Conflict With Implementation?
T-1	Transportation	Pavley I and II – Light-Duty Vehicle GHG Standards	NO	NO
T-2	Transportation	Low Carbon Fuel Standard (Discrete Early Action)	NO	NO
T-3	Transportation	Regional Transportation-Related GHG Targets	NO	NO
T-4	Transportation	Vehicle Efficiency Measures	NO	NO
T-5	Transportation	Ship Electrification at Ports (Discrete Early Action)	NO	NO
T-6	Transportation	Goods-movement Efficiency Measures	NO	NO
T-7	Transportation	Heavy Duty Vehicle Greenhouse Gas Emission Reduction Measure – Aerodynamic Efficiency (Discrete Early Action)	NO	NO
T-8	Transportation	Medium and Heavy-Duty Vehicle Hybridization	NO	NO
T-9	Transportation	High Speed Rail	NO	NO
E-1	Electricity and Natural Gas	Increased Utility Energy efficiency programs More stringent Building and Appliance Standards	YES	NO
E-2	Electricity and Natural Gas	Increase Combined Heat and Power Use by 30,000GWh	NO	NO
E-3	Electricity and Natural Gas	Renewable Portfolio Standard	NO	NO
E-4	Electricity and Natural Gas	Million Solar Roofs	YES	NO
CR-1	Electricity and Natural Gas	Energy Efficiency	YES	NO
CR-2	Electricity and Natural Gas	Solar Water Heating	NO	NO
GB-1	Green Buildings	Green Buildings	YES	NO
W-1	Water	Water Use Efficiency	YES	NO
W-2	Water	Water Recycling	NO	NO
W-3	Water	Water System Energy Efficiency	YES	NO
W-4	Water	Reuse Urban Runoff	NO	NO
W-5	Water	Increase Renewable Energy Production	NO	NO
W-6	Water	Public Goods Charge (Water)	NO	NO
I-1	Industry	Energy Efficiency and Co-benefits Audits for Large Industrial Sources	YES	NO
I-2	Industry	Oil and Gas Extraction GHG Emission Reduction	NO	NO
I-3	Industry	GHG Leak Reduction from Oil and Gas Transmission	NO	NO
I-4	Industry	Refinery Flare Recovery Process Improvements	NO	NO
I-5	Industry	Removal of Methane Exemption from Existing Refinery Regulations	NO	NO
RW-1	Recycling and Waste Management	Landfill Methane Control (Discrete Early Action)	NO	NO
RW-2	Recycling and Waste Management	Additional Reductions in Landfill Methane – Capture Improvements	NO	NO
RW-3	Recycling and Waste Management	High Recycling/Zero Waste	NO	NO
F-1	Forestry	Sustainable Forest Target	NO	NO
H-1	High Global Warming Potential Gases	Motor Vehicle Air Conditioning Systems (Discrete Early Action)	NO	NO
H-2	High Global Warming Potential Gases	SF_6 Limits in Non-Utility and Non-Semiconductor Applications (Discrete Early Action)	NO	NO
H-3	High Global Warming Potential Gases	Reduction in Perflourocarbons in Semiconductor Manufacturing (Discrete Early Action)	NO	NO
H-4	High Global Warming Potential Gases	Limit High GWP Use in Consumer Products (Discrete Early Action, Adopted June 2008)	NO	NO
H-5	High Global Warming Potential Gases	High GWP Reductions from Mobile Sources	NO	NO
H-6	High Global Warming Potential Gases	High GWP Reductions from Stationary Sources	NO	NO
H-7	High Global Warming Potential Gases	Mitigation Fee on High GWP Gases	NO	NO
A-1	Agriculture	Methane Capture at Large Dairies	NO	NO

Source: (Urban Crossroads, 2012c, Table 3-5)

standards is dependent on implementation by the State on vehicle fuel economy standards. Implementation of such a standard is not within the purview of this Project. Therefore, the proposed Project would not conflict with measures concerning the Pavley standards.

Action T-2 concerns implementation of a low carbon fuel standard. To reduce the carbon intensity of transportation fuels, CARB is developing a Low Carbon Fuel Standard (LCFS), which would reduce the carbon intensity of California's transportation fuels by at least ten percent by 2020 as called for by Governor Schwarzenegger in Executive Order S-01-07. LCFS will incorporate compliance mechanisms that provide flexibility to fuel providers in how they meet the requirements to reduce GHG emissions. Implementation of such a standard is not within the purview of this Project. Therefore, the proposed Project would not conflict with measures concerning the use of low carbon fuels.

Action T-3 addressees regional transportation targets for reducing GHG emissions. SB 375 requires CARB to develop, in consultation with MPOs, passenger vehicle GHG emissions reduction targets for 2020 and 2035. It sets forth a collaborative process to establish these targets, including the appointment by CARB of a Regional Targets Advisory Committee to recommend factors to be considered and methodologies for setting GHG emissions reduction targets. SB 375 also provides incentives – relief from certain California Environmental Quality Act (CEQA) requirements for development projects that are consistent with regional plans that achieve the targets. Implementation of such a standard is not within the purview of this Project. Therefore, the proposed Project would not conflict with measures concerning SB 375.

Action T-4 is concerned with vehicle efficiency measures. The California Integrated Waste Management Board (CIWMB) with various partners continues to conduct a public awareness campaign to promote sustainable tire practices. CARB is pursuing a regulation to ensure that tires are properly inflated when vehicles are serviced. In addition, CEC in consultation with CIWMB is developing an efficient tire program focusing first on data gathering and outreach, then on potential adoption of minimum fuel-efficient tire standards, and lastly on the development of consumer information requirements for replacing tires. CARB is also pursuing ways to reduce engine load via lower friction oil and reducing the need for air conditioner use. CARB is actively engaged in the regulatory development process for the tire inflation component of this measure. Implementation of such a standard is not within the purview of this Project. Therefore, the proposed Project would not conflict with applicable measures.

Action T-5 addresses electrification of ships at ports and is not applicable to the proposed Project.

Action T-6 also primarily addresses port operations and is not applicable to the proposed Project.

Action T-7 requires existing trucks/trailers to be retrofitted with the best available technology and/or CARB-approved technology. Implementation of such a standard is not within the purview of the proposed Project because various trucks fleets from numerous commercial entities may access the site and cannot be feasibly monitored or controlled by the Project Applicant, City of Moreno Valley, or future Project tenant. Therefore, this measure is not applicable to the proposed Project.

Action T-8 focuses on hybridization of medium- and heavy-duty vehicles. The implementation approach to Action T-8 is to adopt a regulation and/or incentive program that reduces GHG

emissions by encouraging hybrid technology as applied to vocational applications that have significant urban, stop-and-go driving, idling, and power take-off operations in their duty cycle. Such applications include parcel delivery trucks and vans. Implementation of such a standard is not within the purview of the proposed Project since various trucks fleets from numerous commercial entities may access the site. Therefore, the proposed Project would not conflict with this measure.

Action T-9 concerns implementation of a high speed rail system. This measure is not applicable to the Project.

- *Electricity and Natural Gas*

Action E-1 and CR-1, together with Action GB-1 (Green Building), aims to reduce electricity demand by increased efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. The Project will comply with or surpass mandatory Title 24 Energy Efficiency Standards in effect at the time of Project construction. Therefore, the proposed Project would not conflict with this measure.

Action E-2 encourages an increase in the use of combined heat and power (CHP) use, or co-generation, facilities. California has supported CHP for many years, but market and other barriers continue to keep CHP from reaching its full market potential. Increasing the deployment of efficient CHP will require a multi-pronged approach that includes addressing significant barriers and instituting incentives or mandates where appropriate. Implementation of such a standard is not within the purview of the proposed Project; therefore, the proposed Project would not conflict with this measure.

Action E-3 concerns Renewable Portfolio Standards for utilities and does not apply to development projects.

Action E-4 strives to promote solar generated electricity. Because the proposed building would be designed to accommodate renewable energy sources, such as photovoltaic solar electricity systems, appropriate to the architectural design, the proposed Project would not conflict with the recommended measure.

Action CR-2 strives to promote solar water heaters (SWH). The ARB recommends that California pursue approaches with the goal of developing a viable SWH industry for 2020 and beyond. Implementation of such a standard is not within the purview of the Project; therefore, the proposed Project would not conflict with this measure.

- *Water Use*

Implementation of all but two of the Recommended Actions related to water use are not within the purview of the proposed Project. The two measures that apply are measures W-1 (Water Use Efficiency) and W-3 (Water System Energy Efficiency). However, because the proposed Project would not exceed the audit threshold of 25,000 MT CO_2 from on-site combustion and related activities, the proposed Project is consistent with and would not obstruct the recommended actions.

o *Industrial Use*

All but one of the Recommended Actions related to industrial use are specific to oil and gas extraction, refining and transmission and are not applicable to the proposed Project. The one other Action I-1 targets large emitters of GHGs (in excess of 0.5 million metric tons (MMT)/year of CO_2e (equivalent)) for auditing. Because the proposed Project would not exceed the audit threshold, the proposed Project is consistent with and would not obstruct the recommended actions.

❑ Consistency with GHG Emission Reduction Strategies Set Forth in the 2006 Climate Action Team (CAT) Report

Table 4.2-6, *Project Compliance with Applicable 2006 CAT Report GHG Emissions Reduction Strategies*, sets forth the emission reduction strategies set forth in the 2006 CAT Report along with an explanation as to how the Project is consistent therewith. Table 4.2-6 also notes whether the strategy is applicable to the Project.

As indicated in Table 4.2-6, the proposed Project would be consistent with or would not conflict with any of the identified CAT strategies. Although implementation of the CAT strategies would reduce GHG emissions to the extent possible, it is not possible to specifically quantify the reduction in GHG that will result from implementation of CAT strategies and programs. However, a project that is consistent with CAT strategies is consistent with the strategies suggested to reduce California's emissions to the levels proposed by Executive Order S-3-05 and AB 32, and therefore would result in a less than significant impact on GCC.

❑ Conclusion

As indicated previously in EIR Subsection 4.2.2, in the absence of an adopted quantitative threshold of significance, and for purposes of analysis within this Subsection, the applicable threshold of significance is whether or not the Project would be consistent with the CARB Scoping Plan and the 2006 CAT Report.

As indicated in the above discussion and analysis, the proposed Project would be consistent with, or otherwise not in conflict with, the CARB Scoping Plan recommended measures and actions and the GHG emission reduction strategies set forth in the 2006 CAT Report. Because the proposed Project would be consistent with both the CARB Scoping Plan and the 2006 CAT Report, Project-related GHG emissions would not be substantial and would not directly or indirectly result in a significant impact on the environment. This conclusion reflects a conservative analysis of Project-related impacts as the analysis presented previously in this subsection does not credit the Project for a reduction of GHG emissions that would result from implementation of Project design features or the mitigation measures specified in EIR Section 4.1, *Air Quality* (which also would serve to reduce Project-related GHG emissions). Therefore, the proposed Project would not result in a significant impact to the environment as a result of Project-related GHG emissions.

In addition, there are currently no plans, policies, or regulations that are applicable to the proposed Project and that have been adopted for the purpose of reducing the emissions of GHGs. Although there are no applicable plans, policies, or regulations that are applicable to the proposed Project, the

Table 4.2-6 Project Compliance with Applicable 2006 CAT Report GHG Emissions Reduction Strategies

Strategy	Remarks
California Air Resource Board	
Vehicle Climate Change Standards AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the ARB in September 2004.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Other Light Duty Vehicle Technology New standards would be adopted to phase in beginning in the 2017 model.	
Heavy-Duty Vehicle Emission Reduction Measures Increased efficiency in the design of heavy-duty vehicles and an education program for the heavy-duty vehicle sector.	
Diesel Anti-Idling In July 2004, the CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	Compliant. Heavy-duty diesel trucks that access the project site will be required to limit idling to no more than five minutes.
Hydrofluorocarbon Reduction 1) Ban retail sale of HFC in small cans; 2) Require that only low GWP refrigerants be used in new vehicular systems; 3) Adopt specifications for new commercial refrigeration; 4) Add refrigerant leak-tightness to the pass criteria for vehicular Inspection and Maintenance programs; 5) Enforce federal ban on releasing HFCs.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Transportation Refrigeration Units (TRUs), Off-Road Electrification, Port Electrification Strategies to reduce emissions from TRUs, increase off-road electrification, and increase use of shore-side/port electrification.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions. Further, no refrigerated truck units will access the Project site, nor does the Project proposed refrigerated warehousing.
Alternative Fuels: Biodiesel Blends CARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Reduced Venting and Leaks in Oil and Gas Systems Rule considered for adoption by the Air Pollution Control Districts for improved management practices.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Hydrogen Highway The California Hydrogen Highway Network (CA H_2 Net) is a State initiative to promote the use of hydrogen as a means of diversifying the sources of transportation energy.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Integrated Waste Management Board	
Achieve 50 percent Statewide Recycling Goal Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter	Compliant. The project is required to comply with the City's Source Reduction and Recycling Element (SRRE). To this end, the Project design includes provisions for tenants

Table 4.2-6 Project Compliance with Applicable 2006 CAT Report GHG Emissions Reduction Strategies (Cont'd)

1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48 percent has been achieved on a statewide basis. Therefore, a 2 percent additional reduction is needed.	to recycle. In accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code § 42911), the Project would provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued.
Zero Waste - High Recycling Additional recycling beyond the State's 50 percent recycling goal.	
Department of Forestry	
Forest Management Strategies for storing more carbon through forest management activities can involve a range of management activities such as increasing either the growth of individual trees, the overall age of trees prior to harvest, or dedicating land to older age trees.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Forest Conservation Conservation projects are designed to minimize/prevent the climate change emissions that are associated with the conversion of forestland to non-forest uses by adding incentives to maintain an undeveloped forest landscape.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Fuels Management/Biomass Large, episodic, unnaturally hot fires are an increasing trend on California's wild lands because of decades of fire suppression activities, sustained drought, and increasing insect, disease, and invasive plans infestations. Actions taken to reduce wildfire severity through fuel reduction and biomass development would reduce climate change emissions from wildfire, increase carbon sequestration, replace fossil fuels, and provide significant economic development opportunities.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Urban Forestry A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	The Project does not involve or propose a formal urban forestry program. Nor has the City adopted or implemented an urban forestry program. Notwithstanding, the Project will construct landscaping improvements, including tree plantings, consistent with the City's landscape design guidelines.
Afforestation/Reforestation Projects Reforestation projects focus on restoring native tree cover on lands that were previously forested and are now covered with other vegetative types.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Department of Water Resources	
Water Use Efficiency Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions.	Compliant. The Project shall implement U.S. EPA Certified WaterSense labeled or equivalent faucets and high-efficiency toilets (HETs), and implement water-conserving shower heads where applicable.
California Energy Commission (CEC)	
Building Energy Efficiency Standards in Place and in Progress	Compliant. Project will be compliant with incumbent California

Table 4.2-6 Project Compliance with Applicable 2006 CAT Report GHG Emissions Reduction Strategies (Cont'd)

Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	Code of Regulations, Title 24 (Energy Efficiency Standards for Residential and Nonresidential Buildings).
Appliance Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	Compliant. Appliances purchased for use in the Project will be consistent with all applicable energy efficiency standards.
Fuel-Efficient Replacement Tires & Inflation Programs State legislation (Chapter 912, Statues of 2001) directed the Energy Commission to investigate and to recommend ways to improve fuel efficiency of vehicle tires. The bill established a statewide program to encourage the production and use of more fuel efficient tires.	Not Applicable. The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Cement Manufacturing Cost-effective reductions to reduce energy consumption and to lower carbon dioxide emissions in the cement industry.	Not Applicable. The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Municipal Utility Strategies Includes energy efficiency programs, renewable portfolio standard, combined heat and power, and transitioning away from carbon-intensive generation.	Not Applicable. The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Alternative Fuels: non-Petroleum Fuels Increasing the use of non-petroleum fuels in California's transportation sector, as recommended in the CEC=s 2003 and 2005 Integrated Energy Policy Reports.	Not Applicable. The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Business Transportation and Housing	
Smart Land Use and Intelligent Transportation Systems (ITS) Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. ITS is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services. Governor Schwarzenegger is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through state investments, incentives and technical assistance, land use, and technology strategies that provide for a prosperous economy, social equity, and a quality environment.	Compliant. The Project is proximate to serving transportation corridors, thereby promoting operational efficiencies.

Table 4.2-6 Project Compliance with Applicable 2006 CAT Report GHG Emissions Reduction Strategies (Cont'd)

Measures to Improve Transportation Energy Efficiency Builds on current efforts to provide a framework for expanded and new initiatives including incentives, tools and information that advance cleaner transportation and reduce climate change emissions.	Compliant. The Project promotes transportation efficiencies through its location proximate to serving transportation corridors. Moreover, distribution warehouse uses such as those proposed by the Project act to consolidate regional transport and delivery of goods, thereby reducing VMT within the region, further improving transportation efficiencies. trips
Department of Food and Agriculture	
Conservation tillage/cover crops Conservation tillage and cover crops practices are increasingly being used by California farmers for a variety of reasons, including improved soil tilth, improved water use efficiency, reduced tillage requirements, saving labor and fuel, and reduced fertilizer inputs.	The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
Enteric Fermentation Cattle emit methane from digestion processes. Changes in diet could result in a reduction in emissions.	Not Applicable. The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
State and Consumer Services Agency	Not Applicable.
Green Buildings Initiative Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels.	Compliant. The Project will meet or surpass Title 24 Energy Efficiency standards, acting to reduce area source GHG emissions. Further, State mandated programs (Pavely et al.) will act to substantively reduce mobile-source GHG emissions. Additionally, the Project is required to comply with the mandatory provisions of the California Green Building Standards Code (CALGreen) pursuant to the California Code of Regulations, Title 24, which became effective on January 1, 2011.
Public Utilities Commission (PUC)	
Accelerated Renewable Portfolio Standard The Governor has set a goal of achieving 33 percent renewables in the State's resource mix by 2020. The joint PUC/Energy Commission September 2005 Energy Action Plan II (EAP II) adopts the 33 percent goal.	Not Applicable. The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.
California Solar Initiative Installation of 1 million solar roofs or an equivalent 3,000 MW by 2017 on homes and businesses; increased use of solar thermal systems to offset the increasing demand for natural gas; use of advanced metering in solar applications; and creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	Compliant. Project buildings will be designed to accommodate renewable energy sources, such as photovoltaic solar energy systems as is economically and physically feasible.
Investor-Owned Utility This strategy includes energy efficiency programs, combined heat and power initiative, and electricity sector carbon policy for investor owned utility.	Not Applicable. The noted measures are beyond the purview of the Project. Their implementation by the State and others will act to reduce areawide GHG emissions.

Source: State of California, Environmental Protection Agency, Climate Action Team, 2006.

Project would nonetheless be consistent with the CARB Scoping Plan and the 2006 CAT Report strategies for reducing GHG emissions. Therefore, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and a significant impact would not occur.

4.2.4 CUMULATIVE IMPACT ANALYSIS

GCC occurs as the result of global emissions of GHGs. An individual project proposal does not have the potential to result in significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines also emphasize that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (See CEQA Guidelines §15130[f]).

Accordingly, the Project-specific impact analysis provided above in Subsection 4.2.3 reflects a cumulative impact analysis of the Project's GHG emissions, and concludes that because the proposed Project would comply with all applicable GHG-reduction strategies set forth by the CARB Scoping Plan and 2006 CAT Report, the proposed Project's GHG emissions would not be cumulatively considerable. In addition, the analysis in EIR Subsection 4.2.3 demonstrates that the proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHGs. Therefore, Project-related emissions of GHGs would be less than significant on both a direct and cumulative basis.

4.2.5 APPLICABLE PROJECT REQUIREMENTS

PR 4.2-1 The Project is required to comply with mandatory regulatory requirements imposed by the State of California and the SCAQMD aimed at the reduction of air quality emissions. Those that are applicable to the Project and that would assist in the reduction of Project-related GHG emissions include, but are not limited to the following:

a) Global Warming Solutions Act of 2006 (AB32).

b) Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375).

c) Pavely Fuel Efficiency Standards (AB1493), which establishes fuel efficiency ratings for new vehicles.

d) California Code of Regulations Title 13, Division 3 addressing diesel exhaust emissions. Specifically, Chapter 1, Article 4.5, §2025, "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles" and Chapter 10, Article 1, §2485, "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling."

e) California Code of Regulations Title 24 (California Building Code), which establishes energy efficiency requirements for new construction.

f) California Code of Regulations Title 20 (Appliance Energy Efficiency Standards), which establishes energy efficiency requirements for appliances.

g) Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.

h) California Water Conservation in Landscaping Act of 2006 (AB1881), which requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes.

i) Statewide Retail Provider Emissions Performance Standards (SB 1368), requiring energy generators to achieve performance standards for GHG emissions.

j) Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020

k) South Coast Air Quality Management District Rule 1118 "PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations," and Rule 1186.1 "Less Polluting Street Sweepers."

PR 4.2-2 The Project will provide on-site bicycle storage pursuant to City of Moreno Valley Municipal Code §9.11.060.B, Off-Street Bicycle Parking Requirements.

PR 4.2-3 The Project will comply with all applicable provisions of the City of Moreno Valley Municipal Code Chapter 6.02 "Refuse Collection, Transfer and Disposal" and Chapter 8.80 "Recycling and Diversion of Construction and Demolition Waste."

4.2.6 SIGNIFICANCE OF IMPACTS PRIOR TO MITIGATION

Thresholds 1 and 2: Less than Significant Impact. The proposed Project would not generate GHG emissions, either directly or indirectly, in quantities that may have a direct or cumulatively considerable significant impact on the environment. In addition, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

4.2.7 MITIGATION MEASURES

Impacts would not be significant; therefore, mitigation measures are not required. Regardless, to ensure that the Project will comply with applicable GHG emission reduction strategies specified in California's 2006 Climate Action Team report, the following mitigation measures are recommended.

MM 4.2-1 Prior to the approval of building permits, the City shall review the building plans to ensure that the building's mechanical/electrical/plumbing (MEP) plans specify the installation of U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads (if showers are proposed).

MM 4.2-2 Prior to the approval of building permits, the City shall review the building plans to ensure that the building's roof is structurally designed to accommodate the future addition of photovoltaic solar panels.

4.3 NOISE

The following analysis is based on a technical noise study prepared by Urban Crossroads, Inc. entitled "First Industrial Logistics II Noise Impact Analysis, City of Moreno Valley, California," dated October 31, 2012, and included as *Technical Appendix E* to this EIR. The report considers potential noise impacts associated with construction and operation of the proposed Project.

4.3.1 EXISTING CONDITIONS

A. Study Area Description

The Project site is located in the City of Moreno Valley. The Project Applicant is proposing a high cube industrial warehouse building containing 400,130 square feet of interior building space located on the northwest corner of Perris Boulevard and Nandina Avenue. Existing development near the Project site contains a mix of single-family residential, industrial, office, and warehouse land uses as previously described in EIR Section 2.0, *Environmental Setting*. The March Air Reserve Base is located approximately 0.9-mile west of the Project site. The locations of the nearest sensitive receptors to the Project site are depicted on Figure 4.3-1, *Off-Site Noise Sensitive Receptors.*

B. Noise Fundamentals

❑ Noise Definitions

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Because the range of sound that the human ear can detect is so large, the scale used to measure sound intensity is based on multiples of 10, the logarithmic scale. The unit of measure in which a sound intensity is described is the decibel (dB). Each interval of 10 dB indicates a sound energy 10 times greater than before, which is perceived by the human ear as being roughly twice as loud. A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise sources by discriminating against very low and very high frequencies of the audible spectrum; dBA is adjusted to reflect only those frequencies which are audible to the human ear. (Urban Crossroads, 2012d, p. 4)

The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 100 feet (Urban Crossroads, 2012d, p. 4). Figure 4.3-2, *Typical Noise Levels and Their Subjective Loudness and Effects*, presents a summary of typical noise levels and their subjective loudness and effects.

Environmental noise descriptors are generally based on averages, rather than instantaneous noise levels. The most commonly used figure is the equivalent level (Leq.). Leq. represents a steady sound level containing the same total energy as a time-varying level over a given measurement interval. Leq. may represent any desired length of time; however, one hour is the most commonly used in environmental work. (Urban Crossroads, 2012d, p. 4).

Peak hour noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour levels may be disturbing if they occur during times when quiet is most

desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24 hour noise level, is utilized (Urban Crossroads, 2012d, p. 4).

The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time of day corrections require the addition of five (5) dB to sound levels in the evening from 7 p.m. to 10 p.m., and the addition of 10 dB to sound levels at night between 10 p.m. and 7 a.m. These additions are made to account for the noise sensitive time periods during the evening and nighttime hours when sound appears louder. CNEL does not represent the actual sound level heard at any particular time, but rather represents the total sound exposure (Urban Crossroads, 2012d, p. 4).

❑ Effects of Noise

Harmful effects of noise can include speech interference, sleep disruption, and loss of hearing. High background noise levels can affect performance and learning processes through: distraction; reduced accuracy; increased fatigue, annoyance, and irritability; the inability to concentrate; and sleep prevention. Several factors determine whether a particular noise will interfere with sleep. These factors include the noise level and characteristics, the stage of sleep, the individual's age, and motivation to waken.

Approximately 10% of the population has a very low tolerance for noise and will object to any noise not of their own making. Consequently, even in the quietest environment, some complaints will occur. Another 25% of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. Despite this variability in behavior on an individual level, the population as a whole can be expected to exhibit the following responses to changes in noise levels. An increase or decrease of 1.0 dBA cannot be perceived except in carefully controlled laboratory experiments, a change of 3.0 dBA may be perceptible, and a change of 5 dBA is often necessary before any noticeable change in community response (i.e. complaints) would be expected (Urban Crossroads, 2012d, p. 7).

❑ Traffic Noise Prediction

According to the *Highway Traffic Noise Analysis and Abatement Policy and Guidance* provided by the Federal Highway Administration, the level of traffic noise depends on three primary factors: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the vehicle mix within the flow of traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and a greater number of trucks. A doubling of the traffic volume, assuming that the speed and vehicle mix do not change, results in a noise level increase of 3 dBA. The vehicle mix on a given roadway may also have an effect on community noise levels. As the number of medium and heavy trucks increases and becomes a larger percentage of the vehicle mix, adjacent noise level impacts will increase. Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires on the roadway (Urban Crossroads, 2012d, p. 6).

❑ Ground Absorption of Noise

To account for the ground-effect attenuation (absorption) of noise, two types of site conditions are commonly used in traffic noise models: soft site and hard site conditions. Soft site conditions

account for the sound propagation loss over natural surfaces such as normal earth and ground vegetation. A drop-off rate of 4.5 dBA per doubling of distance is typically observed over soft ground with landscaping, as compared with a 3.0 dBA drop-off rate over hard ground such as asphalt, concrete, stone, and very hard packed earth. Caltrans research has shown that the use of soft site conditions is more appropriate for the application of the FHWA traffic noise prediction model used in this analysis (Urban Crossroads, 2012d, p. 6).

❑ Noise Control and Noise Barrier Attenuation

Noise control is the process of obtaining an acceptable noise environment for a particular observation point or receptor by controlling the noise source, transmission path, receptor, or all three. This concept is known as the source-path-receptor concept. In general, noise control measures can be applied to any and all of these three elements (Urban Crossroads, 2012d, p. 6).

Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receptor. Noise barriers, however, do have limitations. For a noise barrier to work, it must be high enough and long enough to block the view of the noise source (Urban Crossroads, 2012d, p. 6).

❑ Land Use Compatibility

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are considered to be more sensitive to noise intrusion than are commercial or industrial activities. Ambient noise levels can also affect the perceived desirability or livability of a development. For these reasons, land use compatibility with the noise environment is an important consideration in the planning and design process (Urban Crossroads, 2012d, p. 7).

C. Noise Analysis Methodology

❑ 24-Hour Noise Readings

Mobile, or transportation-related noise impacts, are measured using the 24-hour CNEL to assess the land use compatibility for community noise exposure. 24-hour noise readings for the Project were recorded by Urban Crossroads, Inc. on Thursday, October 25th, 2012 using five (5) Quest DL Pro data logging Type 2 noise dosimeters. All noise meters were programmed in “fast” mode to record noise levels in A-weighted form. The sound level meters and microphone were equipped with a widescreen during all measurements (Urban Crossroads, 2012d, p. 12).

❑ Construction Equipment Reference Noise Levels

In January 2006, the Federal Highway Administration (FHWA) published a national database of construction equipment reference noise emission levels. The database provides a comprehensive list of the noise generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation (Urban Crossroads, 2012d, p. 33).

Noise levels generated by heavy construction equipment can range from approximately 70 dBA to noise levels in excess of 100 dBA when measured at 50 feet. These noise levels diminish with

distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 78 dBA measured at 50 feet from the noise source to the receptor would be reduced to 72 dBA at 100 feet from the source to the receptor, and would be further reduced to 66 dBA at 200 feet from the source to the receptor (Urban Crossroads, 2012d, pp. 33-34).

❑ FHWA Traffic Noise Prediction Model and Model Inputs

Future roadway noise impacts from vehicular traffic were projected using a computer program that replicates the FHWA and Model Inputs Traffic Noise Prediction Model- FHWA-RD-77-108 (the "FHWA Model"). The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). Adjustments are then made to the REMEL to account for the roadway classification (e.g., collector, secondary, major, or arterial), the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway), the total average daily traffic (ADT), the travel speed, the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume, the roadway grade, the angle of view (e.g., whether the roadway view is blocked), the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping), and the percentage of total ADT which flows each hour throughout a 24-hour period (Urban Crossroads, 2012d, p. 16)

Table 4.3-1, *Off –Site Road Parameters*, presents the FHWA Model roadway parameters used by Urban Crossroads, Inc. in the noise analysis. Per the recommendation of Caltrans, soft site conditions were used to develop the noise contours to analyze the traffic noise conditions in the study area. The Existing average daily traffic (ADT) volumes are derived from the First Inland Logistics II Traffic Impact Analysis (*Technical Appendix F*).

Table 4.3-2, Hourly Traffic Flow Distribution1, presents the hourly traffic flow distributions (vehicle mix) used for the noise analysis (which is reflective of the vehicle mix required by the California Department of Public Health). The vehicle mix provides the hourly distribution percentages of automobile, medium trucks, and heavy trucks for input into the FHWA Model (Urban Crossroads, 2012d, p. 16).

D. Existing Noise Conditions

To determine the existing noise level environment, five (5) long-term 24-hour measurements were taken in the Project study area. Figure 4.3-3, *Noise Measurement Locations*, shows the location of the Project site and the noise level measurement locations (locations L1 through L5). The noise level measurements were recorded by Urban Crossroads, Inc. on Thursday, October 25th, 2012, representing the typical ambient noise environment for the study area (Urban Crossroads, 2012d, p. 12). The results of the noise level measurements are presented in Table 4.3-3, *Long-Term (Ambient) Noise Level Measurements*, and are summarized below.

- Site L1 is located near the southern property line of the residential tract to the north of the Project site, approximately 85 feet east of Perris Boulevard and 165 feet north of Rivard Road. The hourly noise levels at Site L1 range from 58.8 to 63.0 dBA Leq and produce a 24-hour CNEL noise level of 64.7 dBA CNEL.

- Site L2 is located next to a house roughly 100 feet north of the Project boundary along San Michele Road and 660 feet west of Perris Boulevard. The hourly noise levels at Site L2 range from 53.5 to 55.9 dBA Leq and produce a 24-hour CNEL noise level of 61.7 dBA CNEL.

- Site L3 is located approximately 140 feet east of the Project boundary on the southeast corner of Perris Boulevard and Modular Way. The hourly noise levels at Site L3 range from 58.8 to 62.3 dBA Leq and produce a 24-hour CNEL noise level of 66.9 dBA CNEL.

- Site L4 is located near a house approximately 100 feet south of the Project boundary along Nandina Avenue and 760 feet west of Perris Boulevard. The hourly noise levels at Site L4 range from 53.6 to 56.1 dBA Leq and produce a 24-hour CNEL noise level of 61.4 dBA CNEL.

- Site L5 is located on the proposed east Project driveway 140 feet west of Perris Boulevard and 325 feet south of Modular Way. The hourly noise levels at Site L5 range from 54.2 to 58.4 dBA Leq and produce a 24-hour CNEL noise level of 62.6 dBA CNEL.

The results of the noise level measurements show that the ambient noise levels in the study area near Perris Boulevard currently exceed the City of Moreno Valley transportation related exterior noise levels of 65 dBA CNEL for noise-sensitive receptors (Urban Crossroads, 2012d, p. 14).

❑ Existing Noise Contours

Existing CNEL noise contours are shown for the 55, 60, 65, and 70 dBA noise levels in Table 4.3-4, *Existing Without Project Conditions Noise Contours*. Noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway. The noise contours do not take into account the effect of any existing noise barriers or topography that may affect ambient noise levels.

❑ Existing Vibration

Groundbourne vibration is usually localized to areas within about 100 feet from the vibration source. There are no existing sources of groundborne vibration (such as a railroad line) on or within 100 feet of the Project site.

E. Existing Noise Standards (Policies and Regulations)

Local noise guidelines are often based on the broader guidelines established by state and federal agencies. Following is a description of the existing noise regulatory setting for the proposed Project because a majority of the Project's traffic distribution (and associated vehicular noise) is projected to route through the City of Moreno Valley and the City of Perris, the noise criteria for the City of Moreno Valley and City of Perris are presented below.

❑ California Office of Planning and Research General Plan Guidelines

The City of Moreno Valley General Plan does not include any standards for measuring impacts associated with traffic noise. Rather, noise is considered in the Environmental Safety section of the General Plan Safety Element. While the General Plan provides background and noise fundamentals,

it does not identify criteria to assess the impacts associated with off-site transportation related noise impacts. Therefore, for purposes of evaluating traffic-related noise impacts within the City of Moreno Valley, the analysis in this EIR instead relies on the noise criteria derived from the standards provided in the General Plan Guidelines, a publication of the California Office of Planning and Research. These standards are used by many California cities and counties and specify the maximum noise levels allowable for new developments. A copy of the General Plan Guidelines is provided as Appendix 3.2 to the Project's Noise Impact Analysis (see *Technical Appendix* E) (Urban Crossroads, 2012d, p. 3.2).

The purpose of the transportation noise criteria is to protect, create, and maintain an environment free from noise and vibration that may jeopardize the health or welfare of sensitive receptors, or degrade quality of life. For the nearby noise sensitive areas, the exterior noise levels should remain below 65 dBA CNEL and for interior areas the noise levels should remain below 45 dBA CNEL. For purposes of analysis within this section, the closest noise sensitive uses within the Project's study area are shown on Figure 4.3-1.

❑ City of Moreno Valley Noise Ordinance

The Noise Ordinance included in Chapter 11.80 of the City of Moreno Valley's Municipal Code provides performance standards and noise control guidelines for determining and mitigating non-transportation or stationary noise source impacts.

Section 11.80.030.C, *Nonimpulsive Sound Decibel Limits*, provides the following restriction:

> *No person shall maintain, create, operate or cause to be operated on private property any source of sound in such a manner as to create any nonimpulsive sound which exceeds the limits set forth for the source land use category (as defined in Section 11.80.020) in Table 11.80.030-2 when measured at a distance of two hundred (200) feet or more from the real property line of the source of the sound, if the sound occurs on privately owned property, or from the source of the sound, if the sound occurs on public right-of-way, public space or other publicly owned property. Any source of sound in violation of this subsection shall be deemed prima facie to be a noise disturbance. (Moreno Valley n.d. Section 11.80.030.C)*

Table 11.80.030-2 of the City's Noise Ordinance, Maxi*mum Sound Levels (in dBA) For Source Land Uses*, shows that the daytime and nighttime standards for commercial uses (including the logistics center/warehouse uses proposed by the Project) are 65 dBA and 60 dBA, respectively (Moreno Valley Municipal Code Table 11.80.030-2).

The City of Moreno Valley also has established exterior noise limits to control noise impacts associated with construction activities. Noise Ordinance Section 11.80.030.D.7, *Construction and Demolitions*, states: "No person shall operate or cause operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between the hours of eight p.m. and seven a.m. the following day such that the sound there from creates a noise disturbance, except for emergency work by public service utilities or for other work approved by the city manager or designee" (Moreno Valley Municipal Code Section 11.80.030.D.7).

❑ City of Perris General Plan Noise Element

The City of Perris General Plan standards also are derived from standards contained in the General Plan Guidelines, a publication of the California Office of Planning and Research. The Noise Element includes standards for land use compatibility for community noise exposure. Goal 1 of the City's Noise Element requires that the State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development. At different exterior noise levels, individual land uses are identified as "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." The City of Perris General Plan's Land Use/Noise Compatibility Guidelines, which are presented as General Plan Exhibit N-1, are designed to ensure noise compatibility of proposed land uses with the predicted future noise environment and illustrate the ranges of allowable exterior noise levels for various land uses based on the 2003 State of California General Plan Guidelines (Perris, City of 2005).

The City of Perris utilizes the CNEL scale as the criterion for assessing the compatibility of residential land uses with transportation related noise sources. For noise sensitive uses such as residential uses, the exterior noise level standard is 65 dBA CNEL and the interior noise standard is 45 dBA CNEL. Commercial uses are not considered noise sensitive uses and are evaluated with respect to the Noise/Land Use Compatibility Criteria that defines an ambient noise level ranging from 65 dBA CNEL to 75 dBA CNEL as conditionally acceptable (Perris, City of 2005).

4.3.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to noise if the Project or any Project-related component would:

1. *Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;*

2. *Expose persons to or generate excessive groundborne vibration or groundborne noise levels;*

3. *Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;*

4. *Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;*

5. *For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels; or*

6. *For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.*

❑ Community Noise Assessment Criteria

While the CEQA Guidelines, City of Moreno Valley and City of Perris noise standards provide direction on noise compatibility and establish noise standards by land use type, they do not define the levels at which increases above the ambient noise levels are considered substantial. However, the

FHWA and Caltrans both identify changes in noise levels of greater than 3 dBA as "barely perceptible," while changes of 5 dBA are considered "readily perceptible" (Urban Crossroads, 2012d, p. 10).

In a community situation, the noise exposure is extended over a long time period, and changes in noise levels occur over years rather than the immediate comparison made in a laboratory situation. The level at which changes in community noise levels become discernible is likely to be some value greater than 1 dBA, and 3 dBA appears to be appropriate for most people (Urban Crossroads, 2012d, p. 10). On this basis, and for the purposes of the proposed Project's noise analysis, a substantial increase in noise levels attributable to operations of the Project would occur:

- If ambient conditions are below applicable standards, and Project-generated noise at receptor land uses would result in:
    - An exceedance of the suggested land uses/noise compatibility guidelines for surface transportation sources presented in the long range plans of the City of Moreno Valley or City of Perris (mobile sources); or
    - An exceedance of the exterior noise standards defined in the City of Moreno Valley Noise Ordinance (area/stationary sources);
- If ambient noise conditions exceed applicable Noise Ordinance Standards and Project-generated noise would create a "barely perceptible" 3 dBA or greater permanent increase in ambient exterior noise levels.
- If noise resulting from Project-related construction activities exceeds the City of Moreno Valley Noise Ordinance.

4.3.3 IMPACT ANALYSIS

Threshold 1:	***Would the proposed Project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***
Threshold 3:	***Would the proposed Project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?***
Threshold 4:	***Would the proposed Project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?***

A. Short-Term Construction Noise Impacts

Construction activities associated with the Project, especially those involving heavy equipment, would initially create short-term noise increases in the vicinity of the Project site, representing a short-term effect on ambient noise levels. Noise generated by construction equipment, including trucks, power tools, concrete mixers and portable generators can reach high levels. Project construction is expected to occur in six (6) stages: demolition, site preparation, grading, building construction, paving, and architectural coating. Grading activities typically represent one of the highest potential sources for noise impacts.

Table 4.3-5, *Demolition Construction Noise Levels1*, shows that during the short-term demolition stage of construction, the exterior noise levels at a distance of 200 feet are estimated at 74.4 dBA Leq. Table 4.3-6, *Site Preparation Noise Levels1*, shows that during the short-term site preparation stage of construction, exterior noise levels at a distance of 200 feet are estimated at 87.1 dBA Leq. Noise level impacts associated with the grading work would result in construction related noise levels of 87.8 dBA Leq. at a distance of 200 feet as shown on Table 4.3-7, *Grading Construction Noise Levels1*. Building construction activity would result in noise level impacts from heavy equipment that would be operational during the physical building construction. Table 4.3-8, *Building Construction Noise Levels1*, shows that during the short-tern building construction stage of construction, noise levels are estimated at 83.3 dBA Leq. at a distance of 200 feet. Paving activities include the movement of any remaining material as well as necessary curb and gutter work, road base material placement and blacktop. Table 4.3-9, *Paving Construction Noise Levels1*, shows that during the short-term paving stage of construction, noise levels at nearby noise sensitive uses are estimated at 80.9 dBA Leq. at a distance of 200 feet. Table 4.3-10, *Architectural Coating Noise Levels1*, shows that during the short-term architectural coating stage of construction, noise levels at a distance of 200 feet are estimated at 74.0 dBA Leq.

The City of Moreno Valley Municipal Code does not specifically address construction noise; however, it does provide noise level limits for the source land use category when measured at a distance of 200 feet. Because the source land use is other than residential, the 65 dBA Leq. at a distance of 200 feet is used as the limit for this analysis to assess the Project construction noise level impacts. As shown in Table 4.3-5 through Table 4.3-10, the six (6) phases of construction related noise levels, the noise impacts associated with the proposed Project are expected to create temporary noise impacts at receptors surrounding the Project site when certain activities occur near the Project property line. Though construction noise is temporary, intermittent and of short duration, the Project's construction would create a significant noise impact because noise levels in excess of 65dBA Leq would occur beyond 200 feet of the property line.

B. Long-Term Operational Noise Impacts

❑ Transportation-Related Noise Impacts

Generally, traffic noise impacts are analyzed both to ensure that a project would not adversely impact the acoustic environment of the surrounding community and also to ensure that a project site is not exposed to an unacceptable level of noise resulting from the ambient noise environment acting upon the property. The proposed Project would consist of a high cube industrial warehouse building and is not considered to be sensitive to noise exposure.

To assess the off-site long-term transportation CNEL noise level impacts associated with development of the proposed Project, noise contours were developed based on the First Inland Logistics II Traffic Impact Analysis (*Technical Appendix F* to this EIR). Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. Traffic noise contour boundaries are typically measured at distances of 100 feet from a roadway centerline. Noise contours were developed for four (4) scenarios: Existing Without Project, Existing With Project, Year (2017) Without Project, and Year (2017) With Project.

Noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 70, 65, 60 and 55 dBA noise levels. The distance from the centerline of the roadway to the CNEL contour boundaries for roadways in the proposed Project's vicinity are presented in Table 4.3-4, Table 4.3-11, *Existing With Project Conditions Noise Contours*, Table 4.3-12, *Year 2017 Without Project Conditions Noise Contours*, and Table 4.3-13, *Year 2017 With Project Conditions Noise Contours*. Noise contours do not take into account the effect of any existing noise barriers or topography that may affect ambient noise levels.

Table 4.3-14, *Existing Off-Site Project Related Traffic Noise Impacts*, presents a comparison of existing without and with Project conditions CNEL noise levels. Table 4.3-11 identifies that the unattenuated exterior noise levels range from 41.9 to 67.3 dBA CNEL at 100 feet from each roadway's centerline. As shown on Table 4.3-14, the Project would generate an unmitigated exterior noise level increase ranging from 0.0 dBA CNEL to 1.6 dBA CNEL. Based on the thresholds of significance, the proposed Project would have a less than significant off-site traffic noise level impact on the study area roadway segments for existing conditions.

Table 4.3-15, *Year 2017 Off-Site Project Related Traffic Noise Impacts*, presents a comparison of the Year 2017 without and with Project conditions CNEL noise levels. Table 4.3-12 identifies the unattenuated exterior noise levels range from 42.5 to 69.4 dBA CNEL at 100 feet from each roadway's centerline. As shown on Table 4.3-15 the Project would generate an unmitigated exterior noise level increase ranging from 0.0 dBA CNEL to 0.6 dBA CNEL. Based on the thresholds of significance, the proposed Project would have a less than significant off-site traffic noise level impact on the study area roadway segments for Year 2017 conditions.

In summary, long-term operation of the proposed Project would not cause a temporary or periodic noise impact associated with vehicular noise. Furthermore, applying the thresholds of significance, the Project would generate a less than significant off-site traffic noise level impact on the study area roadway segments; therefore, no mitigation is required.

❑ Stationary Noise Impacts

The proposed Project would include a 400,130 square foot high cube industrial warehouse building. Stationary noise impacts associated with operation of the Project would include idling trucks, delivery truck activities, and roof-top air conditioning units. The projected noise levels used for analysis assume the worst-case noise environment with the idling trucks, delivery truck activities, and roof-top air conditioning units all operating simultaneously. In reality, these noise levels would vary throughout the day.

o *Loading Dock Activities*

In order to evaluate the noise impacts associated with tractor trailer (truck) unloading/loading activities, reference noise level measurements were taken at a large commercial center located at the intersection of Goldenwest Street and Edinger Avenue in Huntington Beach, CA by Urban Crossroads, Inc. on April 14, 2011. The primary noises generated by tractor trailer unloading is the noise of the truck arriving, backing into the dock area, detaching the cab, attaching the cab to the empty trailer, and exiting the loading dock. The noise level was measured at 77.3 dBA Leq. at a distance of 20 feet from the tractor trailer (Urban Crossroads, 2012d, p. 30).

- *Truck Pass-By*

In order to evaluate the noise impacts associated with truck (tractor trailer) pass-bys, reference noise level measurements were taken at a large commercial center located at the intersection of Goldenwest Street and Edinger Avenue in Huntington Beach, CA by Urban Crossroads, Inc. on April 14, 2011. The measurement included the exiting of the tractor trailer. The noise level was measured at 69.5 dBA Leq. at a distance of 30 feet from the tractor trailer (Urban Crossroads, 2012d, p. 30).

- *Air Condenser Units*

Rooftop mechanical ventilation units are proposed to be installed on the industrial building proposed within the Project site. To assess the mechanical ventilation system (packaged heat pump) noise impacts, typical outdoor sound power levels were provided by Trane (a manufacturer of HVAC systems). The noise ratings provided by Trane indicate that the packaged heat pumps of an air conditioning unit will produce noise levels ranging from 75 to 82 dBA when measured at a distance of three (3) feet (Urban Crossroads, 2012d, p. 30).

To predict the worst-case future noise environment, a continuous noise level of 73 dBA at 10 feet was used to represent the roof-top mechanical ventilation system. The type of air conditioning unit that would be used for the Project's buildings is designed to provide cooling during the peak summer daytime periods, so it is unlikely that all units would operate continuously throughout the noise sensitive nighttime periods. Even though the mechanical ventilation system will cycle on and off throughout the day, this approach presents the worst-case noise condition (Urban Crossroads, 2012d, p. 30).

- *Project-Related Stationary Source Noise Impacts*

Based upon the reference noise levels provided on Table 4.3-16, *Reference Noise Level Measurements1*, it is possible to estimate the stationary source noise levels from the proposed Project at a distance 200 feet from the property line, which allows for a comparison with the noise standards provided in the City of Moreno Valley Noise Ordinance. Noise level projections were calculated based on the Project's site plan (described in EIR Section 3.0) showing the spatial relationship between the potential on-site noise sources and the closest property line. Table 4.3-17, *Project Only Stationary Source Impact Noise Level Projections*, presents the unmitigated exterior noise levels associated with the proposed Project at a distance of 200 feet from the property line. As shown in Table 4.3-17, the unmitigated hourly noise levels are expected to range from 31.4 to 53.0 dBA Leq. The expected operational noise level impacts associated with the Project are below the daytime and nighttime exterior noise level standards for commercial uses of 65 dBA Leq. and 60 dBA Leq., respectively. Therefore, the Project would create a less than significant stationary source noise level impact.

Threshold 2: Would the proposed Project expose persons to or generate excessive groundborne vibration or groundborne noise levels?

The Project would not generate groundborne vibration, except for the potential for vibration to occur during the construction phase from the use of large construction equipment. According to the *Transportation and Construction-Induced Vibration Guidance Manual* prepared for Caltrans, ground-borne vibration from construction activities and equipment such as D-8 and D-9 Caterpillars

bulldozers, earthmovers, and haul trucks at distances of 10 feet do not create vibration amplitudes that cause structural damage to nearby structures. The proposed Project is not expected to employ any pile driving or rock blasting equipment during construction activities, and because the nearest receivers are located over 50 feet from the nearest point of construction activities, impacts from groundborne vibration during near-term construction would be less than significant (Urban Crossroads, 2012d, pp. 40-42)

Long-term operational activities at the proposed Project site will not include nor require equipment, facilities, or activities that would result in perceptible groundborne vibrations, thus long-term operation of the Projection would create no groundborne impacts.

Threshold 5:	***For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed Project expose people residing or working in the project area to excessive noise levels?***
Threshold 6:	***For a project within the vicinity of a private airstrip, would the proposed Project expose people residing or working in the project area to excessive noise levels?***

The Project site is located approximately 0.9-mile east of March Air Reserve Base. According to the *Air Installation Compatible Use Zone Study for March Air Reserve Base* (Department of the Air Force, 2005), and as presented in Figure 4.3-4, *March Reserve Air Base Noise Contours*, the Project site is located outside of the 60 dBA CNEL noise contour. According to the California Division of Aeronautics Noise Standards (California Code of Regulations, Title 21, Section 5000 et. seq.), a noise level of 65 dBA CNEL is considered the "…level of noise acceptable to a reasonable person residing in the vicinity of an airport." Residential land uses are considered more sensitive to noise than the logistics center/warehouse distribution uses proposed by the Project. Aircraft operations would not, therefore, expose people on the Project site to noise levels in excess of 65 dBA CNEL and impacts would be less than significant.

Although the Project site is located near the March Air Reserve Base, this airfield is not a private airfield and there are no other private airfields or airstrips in the vicinity of the Project site. In addition, a private airstrip is not proposed as part of the Project. Therefore, the proposed Project would not expose people to excessive noise levels associated with operations at a private airstrip or helipad; no impacts would result from excessive noise generated by a private airstrip. There would be no impact.

4.3.4 CUMULATIVE IMPACT ANALYSIS

❑ Substantial Noise Increase or Violations (Thresholds 1, 3, and 4)

A. Near-Term Cumulative Construction-Related Noise Impacts

During Project construction, noise levels produced by construction equipment would exceed the City of Moreno Valley's Noise Ordinance. The peak noise level anticipated during construction activities would occur during mass grading of the site, which would result in Project-related noise levels of 87.8 dBA Leq at a distance of 200 feet from the noise source, whereas the Noise Ordinance specifies 65 dBA Leq at a distance of 200 feet. Sensitive noise receptors located between the Project site boundary and approximately 2,774 feet from boundary would experience noise levels during daytime

hours above 65 dBA Leq at some point during construction activities, assuming a clear line-of-site condition. It is not possible to construct the Project and impose any feasible mitigation measures to reduce construction noise to below 65 dBA Leq at a distance of 200 feet from the property boundary.

As indicated previously in EIR Subsection 2.3, some of the properties located in the immediate vicinity of the Project site are vacant or contain non-conforming uses and are anticipated to develop with industrial and warehouse uses consistent with their General Plan land use and zoning designations. In the event that construction activities occur on any properties surrounding the site simultaneous with Project-related construction activities, and that also contribute construction noise to sensitive receptors within 2,774 feet of the Project boundary, a cumulative impact would occur and the Project's construction-related noise contribution to the overall noise level would be cumulatively considerable. Such noise level increases would represent a cumulatively considerable substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project. Because construction noise would be temporary in nature, Project construction activities would not result in a cumulatively considerable substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.

B. Long-Term Cumulative Operational Noise Impacts

Table 4.3-15, *Year 2017 Off-Site Project Related Traffic Noise Impacts*, presents a comparison of the Year 2017 without and with Project conditions CNEL noise levels along roadway segments in the Project's study area. Table 4.3-12 identifies that un-attenuated exterior noise levels range from 42.5 to 69.4 dBA CNEL at 100 feet from each roadway's centerline. Noise levels at 100 feet without the Project that exceed 65 dBA CNEL (the standard for noise-sensitive uses) would occur on Harley Knox Boulevard from west of I-215 to west of Indian Street, on Indian Street between Nandina Avenue and Harley Knox Boulevard, and on Perris Boulevard between San Michelle Road and Nandina Avenue. Along Harley Knox Boulevard, the Project's contribution is 0.1 dBA CNEL. Along Indian Street the Project's contribution is 0.2 dBA CNEL. And, along Perris Boulevard the Project's contribution is 0.0 dBA CNEL. Because there are no sensitive noise receptors located or planned to be located along these road segments and because the Project's noise contribution is well below a level perceptible to the human ear, noise impacts would be less than cumulatively significant and the Project's contribution would be less than cumulatively considerable.

C. Stationary Noise Impacts (Cumulative Conditions)

As indicated previously in Table 4.3-17, *Project Only Stationary Source Impact Noise Level Projections*, noise levels associated with operation of the proposed Project at a distance of 200 feet from the property line is expected to be 54.2 dBA Leq, without attenuation. Walls proposed around the Project's perimeter would attenuate most of this operational noise. The expected operational noise level impacts associated with the Project are below the daytime and nighttime exterior noise level standard of 65 dBA Leq. and 60 dBA Leq., respectively even without the presence of perimeter walls. Therefore, the Project would create a less than significant stationary source noise level impact.

Existing and planned land uses surrounding the Project are similar in operational character to the warehouse building proposed by the Project. The long-term operation of adjacent uses would be expected to produce operational noise levels that are similar to those of the proposed Project (i.e., 48.5 dBA at 200 feet). Due to the internal mechanism of the human ear and how it receives and processes noise, when two sound sources of equal intensity or power are measured together, their

combined effect (intensity level) is 3 dBA higher than the level of either separately. Thus, two noise sources that individually produce 52 dBA will measure 55dBA when the noise sources are combined (absent any other sound alerting factor). Therefore, long-term operation of the proposed Project would not result in the exposure of sensitive receptors to cumulative noise levels in excess of the City's Noise Ordinance standards. Long-term operation of the proposed Project also would not result in a substantial cumulative increase in ambient noise levels. Furthermore, there are no components of the Project's long-term operational characteristics that could produce substantial amounts of temporary or periodic ambient noise levels that could impact nearby sensitive receptors. Accordingly, non-transportation related impacts due to long-term operation of the proposed Project under cumulative conditions would have a less than significant cumulative impact and the Project's contribution would be less than cumulatively considerable.

- **Vibration Impacts (Threshold 2)**

There are no existing or projected sources of groundborne vibration immediately surrounding the Project site. Additionally, the types of construction equipment that would be used to build the proposed Project would not create vibration amplitudes that cause structural damage to nearby structures or that generate excessive groundborne vibration or groundborne noise levels. Accordingly, there would be no cumulative groundborne vibration impact during Project construction and the Project's contribution to vibration, if any, would be less than cumulatively considerable. Under long-term operating conditions, the Project would not involve the use of equipment, facilities, or activities that would result in perceptible groundborne vibration. There would be no significant cumulative impact and the Project would have no potential to contribute to a long-term groundborne noise or vibration impact.

- **Public and Private Airport-Related Noise Levels (Thresholds 5 and 6)**

The proposed Project does not involve the construction or operation of any public airports or public use airports. Airport-related noise levels from the March ARB affecting the Project site are not considered excessive; as such, nearby airport operations would not expose future on-site workers to excessive noise levels. There are no conditions associated with the proposed Project that could result in contributing to airport noise or exposure of additional people to unacceptable levels of airport noise. Accordingly, the Project would have no potential to cumulatively contribute to impacts associated with noise from a public airport or public use airport. Additionally, there are no private airfields or airstrips in the vicinity of the proposed Project site, and the Project would not involve the construction or operation of such facilities. Therefore, implementation of the proposed Project would not expose people residing or working in the Project area to cumulatively excessive noise levels associated with private airstrips, and has no potential to cumulatively contribute to impacts associated with noise from a private airstrip.

4.3.5 APPLICABLE PROJECT REQUIREMENTS

The following is a requirement to which the Project would be required to adhere. Compliance with this requirement was assumed throughout the above noise analysis.

PR 4.3-1 The Project will comply with the City of Moreno Valley Noise Ordinance (Moreno Valley Municipal Code Chapter 11.80).

4.3.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds 1, 3, and 4: Significant Direct and Cumulative Impact (Near-Term). During Project construction, noise levels beyond 200 feet from the property boundary would exceed levels specified in the City of Moreno Valley Noise Ordinance. Existing sensitive receptors (residential) located within 2,774 feet of the Project boundary with a clear line of site to the construction activity would experience noise levels above 65 dBA leq at some point during the construction process. Additionally, in the event that Project construction activities occur simultaneously with other construction activities that affect the same sensitive receptors, cumulative construction-related noise would also be significant.

Under long-term operating conditions, the Project would not generate traffic-related or stationary noise levels above the standards given in the City of Moreno Valley Noise Ordinance or in any adjacent jurisdiction's General Plan. Long-term impacts would be less than significant.

Threshold 2: Less than Significant Impact. Near-term construction activities and long-term operation of the proposed Project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels.

Threshold 5: Less than Significant Impact. The Project would not expose people to excessive noise levels associated with the operation of an airport.

Threshold 6: No Impact. There are no private airstrips in the vicinity of the Project site; as such, the Project has no potential to expose people residing or working in the area to excessive noise levels associated with operation of a private airstrip.

4.3.7 MITIGATION MEASURES

MM 4.3-1 Prior to grading or building permit issuance, the City shall review grading and building plans to ensure that the following notes are included. Project contractors shall be required to comply with these notes and maintain written records of such compliance that can be inspected by the City of Moreno Valley upon request.

a) All construction activities, including but not limited to haul truck deliveries, shall be limited to between the hours of 7:00 a.m. and 8:00 p.m.

b) Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards.

c) All stationary construction equipment and equipment staging areas shall be placed as close as possible to the center of the western property line.

d) All haul truck deliveries shall use City-approved haul routes. Should alternate routes be necessary, haul trucks shall not use roadways that pass noise-sensitive land uses or residential dwellings unless approved by the City of Moreno Valley.

MM 4.3-2 As a condition of the Project's building permit, the perimeter wall planned along San Michelle Road and at the corner of San Michelle Road and Perris Boulevard shall be installed early in the construction process.

4.3.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Thresholds 1, 3, and 4: Significant Direct and Cumulative Impact (Near-Term). Project construction activities would expose off-site properties within 2,274 feet of the Project boundary with direct lines of site to construction activities to daytime noise levels exceeding 65 dBA leq. Mitigation Measures MM 4.3-1 and MM 4.3-2 require construction practices that would minimize noise levels to sensitive receptors, but not to below a level of significance on either a direct or cumulative basis. Additional feasible mitigation measures are not available to further reduce Project-related construction noise levels, resulting in a significant and unavoidable short-term impact.

Table 4.3-1 Off –Site Road Parameters

ID	Roadway	Segment	Roadway Section[1]	Vehicle Speed (MPH)
1	Harley Knox Boulevard	West of I-215 Freeway	4D	55
2	Harley Knox Boulevard	I-215 SB Ramps to I-215 NB Ramps	4D	55
3	Harley Knox Boulevard	I-215 NB Ramps to Western Way	4U	45
4	Harley Knox Boulevard	East of Western Way	4U	45
5	Harley Knox Boulevard	West of Patterson Avenue	4U	45
6	Harley Knox Boulevard	East of Patterson Avenue	2D	45
7	Harley Knox Boulevard	West of Indian Street	4D	55
8	Harley Knox Boulevard	East of Indian Street	4D	55
9	Western Way	North of Harley Knox Boulevard	2U	40
10	Patterson Avenue	North of Harley Knox Boulevard	2U	40
11	Patterson Avenue	South of Harley Knox Boulevard	2U	40
12	Indian Street	North of Nandina Avenue	2D	45
13	Indian Street	South of Nandina Avenue	4D	55
14	Indian Street	North of Harley Knox Boulevard	4D	55
15	Indian Street	South of Harley Knox Boulevard	4D	55
16	Knox Street	North of Nandina Avenue	2D	45
18	Perris Boulevard	South of San Michele Road	4D	55
19	Perris Boulevard	North of Nandina Avenue	4D	55
20	Perris Boulevard	South of Nandina Avenue	4D	55
21	San Michele Road	West of Driveway 1	2D	45
22	San Michele Road	Driveway 1 to Driveway 3	2D	45
23	San Michele Road	Driveway 3 to Perris Boulevard	2D	45
24	Nandina Avenue	West of Indian Street	2U	40
25	Nandina Avenue	Indian Street to Knox Street	2D	45
26	Nandina Avenue	Knox Street to Driveway 2	2D	45
27	Nandina Avenue	Driveway 2 to Driveway 4	2U	40
28	Nandina Avenue	Driveway 4 to Perris Boulevard	2U	40

[1] Source: First Inland Logistics II Traffic Impact Analysis by Urban Crossroads, Inc. in October 2012.

Table 4.3-2 Hourly Traffic Flow Distribution[1]

Motor-Vehicle Type	Daytime (7 am to 7 pm)	Evening (7 pm to 10 pm)	Night (10 pm to 7 am)	Total % Traffic Flow
City Roadways				
Automobiles	77.5%	12.9%	9.6%	97.42%
Medium Trucks	84.8%	4.9%	10.3%	1.84%
Heavy Trucks	86.5%	2.7%	10.8%	0.74%

[1] Typical Southern California Vehicle Mix.

Table 4.3-3 Long-Term (Ambient) Noise Level Measurements

Observer Location[1]	Date	Description	Hourly Noise Level (Leq dBA)[2]		CNEL
			Daytime (7am to 10pm)	Nighttime (10pm to 7am)	
L1	10/25/2012	Located approximately 85 feet east of Perris Boulevard and 165 feet north of Rivard Road. Near the residential tract to the north.	63.0	58.8	67.3
L2	10/25/2012	Located next to a house roughly 100 feet north of the project boundary along San Michele Road and 660 feet west of Perris Boulevard.	55.9	53.5	61.7
L3	10/25/2012	Located approximately 140 feet east of the project boundary on the southeast corner of Perris Boulevard and Modular Way.	62.3	58.8	66.9
L4	10/25/2012	Located near a house approximately 100 feet south of the project boundary along Nandina Avenue and 760 feet west of Perris Boulevard.	56.1	53.6	61.4
L5	10/25/2012	Located on the east project driveway 140 feet west of Perris Boulevard and 325 feet south of Modular Way.	58.4	54.2	62.6

[1] See Exhibit 4-A for the noise measurement locations.

[2] Energy (logarithmic) average hourly noise levels. The long-term noise level measurements printouts are included in Appendix 4.1.

Table 4.3-4 Existing Without Project Conditions Noise Contours

ID	Road	Segment	CNEL at 100 Feet (dBA)	Distance to Contour (Feet)			
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
1	Harley Knox Boulevard	West of I-215 Freeway	63.2	RW	76	164	353
2	Harley Knox Boulevard	I-215 SB Ramps to I-215 NB Ramps	64.6	RW	94	202	436
3	Harley Knox Boulevard	I-215 NB Ramps to Western Way	63.8	RW	83	178	384
4	Harley Knox Boulevard	East of Western Way	63.5	RW	80	172	370
5	Harley Knox Boulevard	West of Patterson Avenue	63.5	RW	80	171	369
6	Harley Knox Boulevard	East of Patterson Avenue	63.2	RW	76	163	351
7	Harley Knox Boulevard	West of Indian Street	64.9	RW	98	212	457
8	Harley Knox Boulevard	East of Indian Street	61.9	RW	62	134	290
9	Western Way	North of Harley Knox Boulevard	51.5	RW	RW	RW	58
10	Patterson Avenue	North of Harley Knox Boulevard	41.9	RW	RW	RW	RW
11	Patterson Avenue	South of Harley Knox Boulevard	51.6	RW	RW	RW	59
12	Indian Street	North of Nandina Avenue	57.6	RW	RW	70	150
13	Indian Street	South of Nandina Avenue	62.2	RW	65	139	300
14	Indian Street	North of Harley Knox Boulevard	63.0	RW	74	160	344
15	Indian Street	South of Harley Knox Boulevard	55.8	RW	RW	RW	113
16	Knox Street	North of Nandina Avenue	47.1	RW	RW	RW	RW
18	Perris Boulevard	South of San Michele Road	66.5	59	127	273	588
19	Perris Boulevard	North of Nandina Avenue	67.3	66	141	304	656
20	Perris Boulevard	South of Nandina Avenue	67.3	66	141	304	656
21	San Michele Road	West of Driveway 1	57.4	RW	RW	67	144
22	San Michele Road	Driveway 1 to Driveway 3	57.4	RW	RW	67	144
23	San Michele Road	Driveway 3 to Perris Boulevard	57.4	RW	RW	67	144
24	Nandina Avenue	West of Indian Street	51.6	RW	RW	RW	59
25	Nandina Avenue	Indian Street to Knox Street	55.7	RW	RW	RW	111
26	Nandina Avenue	Knox Street to Driveway 2	54.1	RW	RW	RW	86
27	Nandina Avenue	Driveway 2 to Driveway 4	51.0	RW	RW	RW	RW
28	Nandina Avenue	Driveway 4 to Perris Boulevard	51.0	RW	RW	RW	RW

[1] "RW" = Location of the respective noise contour falls within the right-of-way of the road

Table 4.3-5 Demolition Construction Noise Levels[1]

Equipment Type	Quantity	Usage Factor[2]	Hours Of Operation[3]	Reference Noise Level @ 50 Feet (Lmax dBA)	Cumulative Level @ 200 Feet (dBA)
Concrete/Industrial Saw	1	20%	1.6	90.0	71.0
Rubber Tired Dozers	2	40%	3.2	79.0	66.0
Excavators	3	40%	3.2	81.0	69.8
Crushing/Processing	1	15%	1.2	83.0	62.7
Cumulative Hourly Noise Levels 200 Feet (Leq dBA)					74.4
Distance to 65 dBA Leq Contour (Feet)					593

[1] Source: FHWA's Roadway Construction Noise Model, January 2006.

[2] Estimates the fraction of time each piece of equipment is operating at full power during a construction operation.

[3] Represents the actual hours of peak construction equipment activity out of a typical 8 hour workday.

Table 4.3-6 Site Preparation Noise Levels[1]

Equipment Type	Quantity	Usage Factor[2]	Hours Of Operation[3]	Reference Noise Level @ 50 Feet (Lmax dBA)	Cumulative Level @ 200 Feet (dBA)
Water Trucks	3	40%	3.2	78.0	78.8
Scrapers	2	40%	3.2	85.0	84.0
Graders	1	40%	3.2	85.0	81.0
Rubber Tired Dozers	1	40%	3.2	79.0	63.0
Tractors/Loaders/Backhoes	2	40%	3.2	78.0	77.0
Cumulative Hourly Noise Levels 200 Feet (Leq dBA)					87.1
Distance to 65 dBA Leq Contour (Feet)					2,534

[1] Source: FHWA's Roadway Construction Noise Model, January 2006.

[2] Estimates the fraction of time each piece of equipment is operating at full power during a construction operation.

[3] Represents the actual hours of peak construction equipment activity out of a typical 8 hour workday.

Table 4.3-7 Grading Construction Noise Levels[1]

Equipment Type	Quantity	Usage Factor[2]	Hours Of Operation[3]	Reference Noise Level @ 50 Feet (Lmax dBA)	Cumulative Level @ 200 Feet (dBA)
Water Trucks	3	40%	3.2	78.0	78.8
Scrapers	2	40%	3.2	85.0	84.0
Graders	1	40%	3.2	85.0	81.0
Rubber Tired Dozers	1	40%	3.2	79.0	63.0
Excavator	2	40%	3.2	81.0	80.0
Tractors/Loaders/Backhoes	2	40%	3.2	78.0	77.0
Cumulative Hourly Noise Levels 200 Feet (Leq dBA)					87.8
Distance to 65 dBA Leq Contour (Feet)					2,774

[1] Source: FHWA's Roadway Construction Noise Model, January 2006.

[2] Estimates the fraction of time each piece of equipment is operating at full power during a construction operation.

[3] Represents the actual hours of peak construction equipment activity out of a typical 8 hour workday.

Table 4.3-8 Building Construction Noise Levels[1]

Equipment Type	Quantity	Usage Factor[2]	Hours Of Operation[3]	Reference Noise Level @ 50 Feet (Lmax dBA)	Cumulative Level @ 200 Feet (dBA)
Tractors/Loaders/Backhoes	3	40%	3.2	78.0	78.8
Forklifts	3	20%	1.6	75.0	72.8
Cranes	2	16%	1.3	81.0	76.1
Generator Sets	1	50%	4.0	81.0	78.0
Welders	1	40%	3.2	74.0	70.0
Cumulative Hourly Noise Levels 200 Feet (Leq dBA)					83.2
Distance to 65 dBA Leq Contour (Feet)					1,622

[1] Source: FHWA's Roadway Construction Noise Model, January 2006.

[2] Estimates the fraction of time each piece of equipment is operating at full power during a construction operation.

[3] Represents the actual hours of peak construction equipment activity out of a typical 8 hour workday.

Table 4.3-9 Paving Construction Noise Levels[1]

Equipment Type	Quantity	Usage Factor[2]	Hours Of Operation[3]	Reference Noise Level @ 50 Feet (Lmax dBA)	Cumulative Level @ 200 Feet (dBA)
Pavers	2	50%	4.0	77.0	77.0
Paving Equipment	2	40%	3.2	76.0	75.0
Rollers	2	20%	1.6	80.0	76.0
Cumulative Hourly Noise Levels 200 Feet (Leq dBA)					80.9
Distance to 65 dBA Leq Contour (Feet)					1,242

[1] Source: FHWA's Roadway Construction Noise Model, January 2006.

[2] Estimates the fraction of time each piece of equipment is operating at full power during a construction operation.

[3] Represents the actual hours of peak construction equipment activity out of a typical 8 hour workday.

Table 4.3-10 Architectural Coating Noise Levels[1]

Equipment Type	Quantity	Usage Factor[2]	Hours Of Operation[3]	Reference Noise Level @ 50 Feet (Lmax dBA)	Cumulative Level @ 200 Feet (dBA)
Air Compressors	1	40%	3.2	78.0	74.0
Cumulative Hourly Noise Levels 200 Feet (Leq dBA)					74.0
Distance to 65 dBA Leq Contour (Feet)					565

[1] Source: FHWA's Roadway Construction Noise Model, January 2006.

[2] Estimates the fraction of time each piece of equipment is operating at full power during a construction operation.

[3] Represents the actual hours of peak construction equipment activity out of a typical 8 hour workday.

Table 4.3-11 Existing With Project Conditions Noise Contours

ID	Road	Segment	CNEL at 100 Feet (dBA)	Distance to Contour (Feet)			
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
1	Harley Knox Boulevard	West of I-215 Freeway	63.2	RW	76	164	353
2	Harley Knox Boulevard	I-215 SB Ramps to I-215 NB Ramps	64.8	RW	97	209	450
3	Harley Knox Boulevard	I-215 NB Ramps to Western Way	64.0	RW	86	185	399
4	Harley Knox Boulevard	East of Western Way	63.8	RW	83	179	386
5	Harley Knox Boulevard	West of Patterson Avenue	63.8	RW	83	179	385
6	Harley Knox Boulevard	East of Patterson Avenue	63.5	RW	79	170	367
7	Harley Knox Boulevard	West of Indian Street	65.2	RW	104	223	480
8	Harley Knox Boulevard	East of Indian Street	61.9	RW	62	134	290
9	Western Way	North of Harley Knox Boulevard	51.5	RW	RW	RW	58
10	Patterson Avenue	North of Harley Knox Boulevard	41.9	RW	RW	RW	RW
11	Patterson Avenue	South of Harley Knox Boulevard	51.7	RW	RW	RW	60
12	Indian Street	North of Nandina Avenue	58.0	RW	RW	73	157
13	Indian Street	South of Nandina Avenue	62.8	RW	71	153	331
14	Indian Street	North of Harley Knox Boulevard	63.6	RW	80	173	373
15	Indian Street	South of Harley Knox Boulevard	56.0	RW	RW	RW	116
16	Knox Street	North of Nandina Avenue	47.1	RW	RW	RW	RW
18	Perris Boulevard	South of San Michele Road	66.6	59	127	274	589
19	Perris Boulevard	North of Nandina Avenue	67.2	65	140	302	651
20	Perris Boulevard	South of Nandina Avenue	67.3	66	141	305	656
21	San Michele Road	West of Driveway 1	57.9	RW	RW	72	156
22	San Michele Road	Driveway 1 to Driveway 3	57.4	RW	RW	66	142
23	San Michele Road	Driveway 3 to Perris Boulevard	57.4	RW	RW	67	145
24	Nandina Avenue	West of Indian Street	51.6	RW	RW	RW	59
25	Nandina Avenue	Indian Street to Knox Street	56.8	RW	RW	61	132
26	Nandina Avenue	Knox Street to Driveway 2	55.6	RW	RW	RW	110
27	Nandina Avenue	Driveway 2 to Driveway 4	51.0	RW	RW	RW	RW
28	Nandina Avenue	Driveway 4 to Perris Boulevard	51.2	RW	RW	RW	56

[1] "RW" = Location of the respective noise contour falls within the right-of-way of the road

Table 4.3-12 Year 2017 Without Project Conditions Noise Contours

ID	Road	Segment	CNEL at 100 Feet (dBA)	Distance to Contour (Feet)			
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
1	Harley Knox Boulevard	West of I-215 Freeway	65.5	RW	108	232	499
2	Harley Knox Boulevard	I-215 SB Ramps to I-215 NB Ramps	68.2	76	163	351	757
3	Harley Knox Boulevard	I-215 NB Ramps to Western Way	67.6	70	150	323	695
4	Harley Knox Boulevard	East of Western Way	67.5	68	147	317	684
5	Harley Knox Boulevard	West of Patterson Avenue	67.5	68	147	317	683
6	Harley Knox Boulevard	East of Patterson Avenue	67.4	67	144	309	666
7	Harley Knox Boulevard	West of Indian Street	69.4	91	196	423	911
8	Harley Knox Boulevard	East of Indian Street	64.6	RW	94	202	436
9	Western Way	North of Harley Knox Boulevard	51.9	RW	RW	RW	62
10	Patterson Avenue	North of Harley Knox Boulevard	42.5	RW	RW	RW	RW
11	Patterson Avenue	South of Harley Knox Boulevard	52.4	RW	RW	RW	67
12	Indian Street	North of Nandina Avenue	63.7	RW	82	177	381
13	Indian Street	South of Nandina Avenue	67.5	68	146	314	676
14	Indian Street	North of Harley Knox Boulevard	67.7	71	152	328	706
15	Indian Street	South of Harley Knox Boulevard	61.5	RW	58	125	270
16	Knox Street	North of Nandina Avenue	51.2	RW	RW	RW	56
18	Perris Boulevard	South of San Michele Road	68.5	80	172	371	800
19	Perris Boulevard	North of Nandina Avenue	69.0	86	185	399	859
20	Perris Boulevard	South of Nandina Avenue	68.9	85	182	392	845
21	San Michele Road	West of Driveway 1	59.6	RW	RW	94	202
22	San Michele Road	Driveway 1 to Driveway 3	59.4	RW	RW	91	196
23	San Michele Road	Driveway 3 to Perris Boulevard	59.4	RW	RW	91	197
24	Nandina Avenue	West of Indian Street	58.6	RW	RW	81	174
25	Nandina Avenue	Indian Street to Knox Street	59.5	RW	RW	92	199
26	Nandina Avenue	Knox Street to Driveway 2	58.4	RW	RW	78	168
27	Nandina Avenue	Driveway 2 to Driveway 4	56.1	RW	RW	55	118
28	Nandina Avenue	Driveway 4 to Perris Boulevard	56.1	RW	RW	55	119

[1] "RW" = Location of the respective noise contour falls within the right-of-way of the road

Table 4.3-13 Year 2017 With Project Conditions Noise Contours

ID	Road	Segment	CNEL at 100 Feet (dBA)	Distance to Contour (Feet)			
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
1	Harley Knox Boulevard	West of I-215 Freeway	65.5	RW	108	232	499
2	Harley Knox Boulevard	I-215 SB Ramps to I-215 NB Ramps	68.3	77	165	356	768
3	Harley Knox Boulevard	I-215 NB Ramps to Western Way	67.7	71	152	328	707
4	Harley Knox Boulevard	East of Western Way	67.6	70	150	323	696
5	Harley Knox Boulevard	West of Patterson Avenue	67.6	69	150	323	695
6	Harley Knox Boulevard	East of Patterson Avenue	67.5	68	146	315	678
7	Harley Knox Boulevard	West of Indian Street	69.5	93	200	431	928
8	Harley Knox Boulevard	East of Indian Street	64.6	RW	94	202	436
9	Western Way	North of Harley Knox Boulevard	51.9	RW	RW	RW	62
10	Patterson Avenue	North of Harley Knox Boulevard	42.5	RW	RW	RW	RW
11	Patterson Avenue	South of Harley Knox Boulevard	52.4	RW	RW	RW	67
12	Indian Street	North of Nandina Avenue	63.8	RW	83	179	385
13	Indian Street	South of Nandina Avenue	67.6	70	150	324	697
14	Indian Street	North of Harley Knox Boulevard	67.9	73	157	337	727
15	Indian Street	South of Harley Knox Boulevard	61.5	RW	59	126	272
16	Knox Street	North of Nandina Avenue	51.2	RW	RW	RW	56
18	Perris Boulevard	South of San Michele Road	68.6	80	173	372	801
19	Perris Boulevard	North of Nandina Avenue	69.0	86	185	399	860
20	Perris Boulevard	South of Nandina Avenue	68.9	85	182	393	846
21	San Michele Road	West of Driveway 1	59.8	RW	RW	97	208
22	San Michele Road	Driveway 1 to Driveway 3	59.4	RW	RW	91	196
23	San Michele Road	Driveway 3 to Perris Boulevard	59.5	RW	RW	92	198
24	Nandina Avenue	West of Indian Street	58.6	RW	RW	81	174
25	Nandina Avenue	Indian Street to Knox Street	60.0	RW	RW	100	215
26	Nandina Avenue	Knox Street to Driveway 2	59.0	RW	RW	86	185
27	Nandina Avenue	Driveway 2 to Driveway 4	56.1	RW	RW	55	119
28	Nandina Avenue	Driveway 4 to Perris Boulevard	56.2	RW	RW	56	120

[1] "RW" = Location of the respective noise contour falls within the right-of-way of the road

Table 4.3-14 Existing Off-Site Project Related Traffic Noise Impacts

ID	Road	Segment	CNEL at 100 Feet (dBA)			Potential Significant Impact?[1]
			No Project	With Project	Project Addition	
1	Harley Knox Boulevard	West of I-215 Freeway	63.2	63.2	0.0	No
2	Harley Knox Boulevard	I-215 SB Ramps to I-215 NB Ramps	64.6	64.8	0.2	No
3	Harley Knox Boulevard	I-215 NB Ramps to Western Way	63.8	64.0	0.3	No
4	Harley Knox Boulevard	East of Western Way	63.5	63.8	0.3	No
5	Harley Knox Boulevard	West of Patterson Avenue	63.5	63.8	0.3	No
6	Harley Knox Boulevard	East of Patterson Avenue	63.2	63.5	0.3	No
7	Harley Knox Boulevard	West of Indian Street	64.9	65.2	0.3	No
8	Harley Knox Boulevard	East of Indian Street	61.9	61.9	0.0	No
9	Western Way	North of Harley Knox Boulevard	51.5	51.5	0.0	No
10	Patterson Avenue	North of Harley Knox Boulevard	41.9	41.9	0.0	No
11	Patterson Avenue	South of Harley Knox Boulevard	51.6	51.7	0.0	No
12	Indian Street	North of Nandina Avenue	57.6	58.0	0.3	No
13	Indian Street	South of Nandina Avenue	62.2	62.8	0.6	No
14	Indian Street	North of Harley Knox Boulevard	63.0	63.6	0.5	No
15	Indian Street	South of Harley Knox Boulevard	55.8	56.0	0.2	No
16	Knox Street	North of Nandina Avenue	47.1	47.1	0.0	No
18	Perris Boulevard	South of San Michele Road	66.5	66.6	0.0	No
19	Perris Boulevard	North of Nandina Avenue	67.3	67.2	0.0	No
20	Perris Boulevard	South of Nandina Avenue	67.3	67.3	0.0	No
21	San Michele Road	West of Driveway 1	57.4	57.9	0.5	No
22	San Michele Road	Driveway 1 to Driveway 3	57.4	57.4	0.0	No
23	San Michele Road	Driveway 3 to Perris Boulevard	57.4	57.4	0.1	No
24	Nandina Avenue	West of Indian Street	51.6	51.6	0.0	No
25	Nandina Avenue	Indian Street to Knox Street	55.7	56.8	1.1	No
26	Nandina Avenue	Knox Street to Driveway 2	54.1	55.6	1.6	No
27	Nandina Avenue	Driveway 2 to Driveway 4	51.0	51.0	0.0	No
28	Nandina Avenue	Driveway 4 to Perris Boulevard	51.0	51.2	0.3	No

[1] A significant impact occurs when the noise level exceeds 65 dBA CNEL and the project generates a noise level increase of greater than 3.0 dBA.

Table 4.3-15 Year 2017 Off-Site Project Related Traffic Noise Impacts

ID	Road	Segment	CNEL at 100 Feet (dBA)			Potential Significant Impact?[1]
			No Project	With Project	Project Addition	
1	Harley Knox Boulevard	West of I-215 Freeway	65.5	65.5	0.0	No
2	Harley Knox Boulevard	I-215 SB Ramps to I-215 NB Ramps	68.2	68.3	0.1	No
3	Harley Knox Boulevard	I-215 NB Ramps to Western Way	67.6	67.7	0.1	No
4	Harley Knox Boulevard	East of Western Way	67.5	67.6	0.1	No
5	Harley Knox Boulevard	West of Patterson Avenue	67.5	67.6	0.1	No
6	Harley Knox Boulevard	East of Patterson Avenue	67.4	67.5	0.1	No
7	Harley Knox Boulevard	West of Indian Street	69.4	69.5	0.1	No
8	Harley Knox Boulevard	East of Indian Street	64.6	64.6	0.0	No
9	Western Way	North of Harley Knox Boulevard	51.9	51.9	0.0	No
10	Patterson Avenue	North of Harley Knox Boulevard	42.5	42.5	0.0	No
11	Patterson Avenue	South of Harley Knox Boulevard	52.4	52.4	0.0	No
12	Indian Street	North of Nandina Avenue	63.7	63.8	0.1	No
13	Indian Street	South of Nandina Avenue	67.5	67.6	0.2	No
14	Indian Street	North of Harley Knox Boulevard	67.7	67.9	0.2	No
15	Indian Street	South of Harley Knox Boulevard	61.5	61.5	0.0	No
16	Knox Street	North of Nandina Avenue	51.2	51.2	0.0	No
18	Perris Boulevard	South of San Michele Road	68.5	68.6	0.0	No
19	Perris Boulevard	North of Nandina Avenue	69.0	69.0	0.0	No
20	Perris Boulevard	South of Nandina Avenue	68.9	68.9	0.0	No
21	San Michele Road	West of Driveway 1	59.6	59.8	0.2	No
22	San Michele Road	Driveway 1 to Driveway 3	59.4	59.4	0.0	No
23	San Michele Road	Driveway 3 to Perris Boulevard	59.4	59.5	0.0	No
24	Nandina Avenue	West of Indian Street	58.6	58.6	0.0	No
25	Nandina Avenue	Indian Street to Knox Street	59.5	60.0	0.5	No
26	Nandina Avenue	Knox Street to Driveway 2	58.4	59.0	0.6	No
27	Nandina Avenue	Driveway 2 to Driveway 4	56.1	56.1	0.0	No
28	Nandina Avenue	Driveway 4 to Perris Boulevard	56.1	56.2	0.1	No

[1] A significant impact occurs when the noise level exceeds 65 dBA CNEL and the project generates a noise level increase of greater than 3.0 dBA.

Table 4.3-16 Reference Noise Level Measurements[1]

Noise Source	Duration (mm:ss)[4]	Distance From Source (Feet)	Noise Source Height (Feet)	Drop-Off Rate[5] (Leq dBA)	Noise Level (Leq dBA)
Loading Dock Activities[1]	1:00	20.0	8.0	6.0	77.3
Truck Pass-By[2]	1:00	30.0	8.0	6.0	69.5
Air Condenser Units[3]	-	10.0	5.0	6.0	73.0

[1] As measured by Urban Crossroads, Inc. on 4/14/11.

[2] As measured by Urban Crossroads, Inc. on 4/14/11.

[3] Data provided by the Krack Technical Bulletin: 0607_469 Rev 0509

[4] Noise measurement duration is consistent will approximate time for each event to occur.

[5] Noise level (dBA) drop-off rate per doubling of distance.

Table 4.3-17 Project Only Stationary Source Impact Noise Level Projections

Noise Source	Reference Noise Level Distance (Feet)	Reference Noise Level (dBA)	Distance From Source To Property Line (Feet)	Source Noise Level At Property Line (dBA)	Reference Noise Level At 200 Feet From Property Line
Loading Dock Activities	20'	77.3	60.0	67.8	47.8
Truck Pass-By	30'	69.5	30.0	69.5	53.0
Air Condenser Units	10'	73.0	60.0	57.4	31.4
Overall Unmittigated Noise Level At 200 Feet From Property Line:					**54.2**

Source: RCTLMA (2012), Google Earth (2012)

Figure 4.3-1

0 250 500 Feet

Off-Site Noise Sensitive Receptors

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		SLEEP DISTURBANCE
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

SOURCE: NOISE TECHNICAL SUPPLEMENT BY CALTRANS

Source: Urban Crossroads (10-31-12)

FIGURE 4.3-2
Typical Noise Levels and Their Subjective Loudness and Effects

LEGEND:

(L5) = LONG-TERM, 24-HOUR, NOISE MEASUREMENT LOCATION

Source: Urban Crossroads (10-31-12)

FIGURE 4.3-3
Noise Measurement Locations

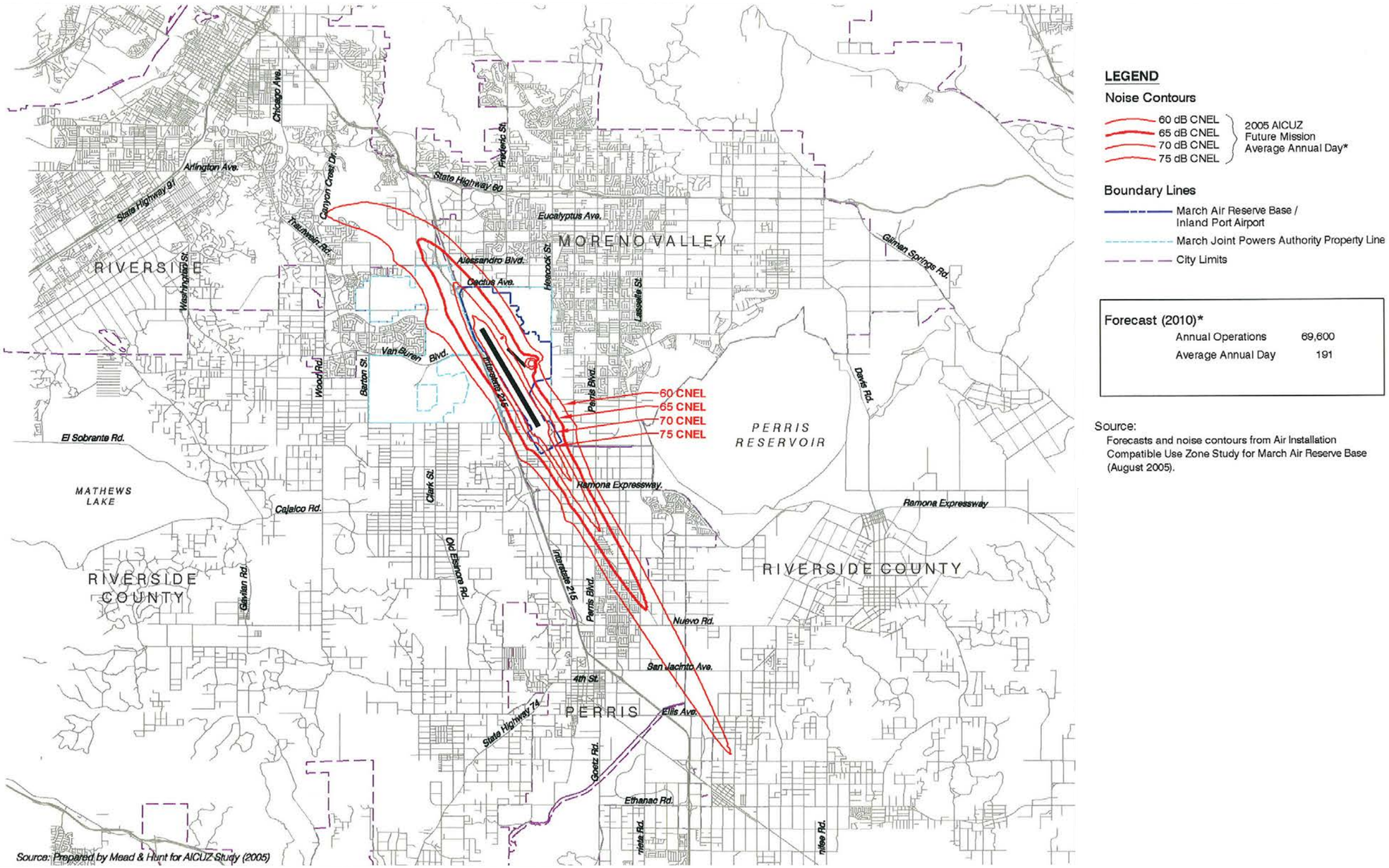


FIGURE 4.3-4
March Reserve Air Base Noise Contours

4.4 TRANSPORTATION/TRAFFIC

The following analysis is based on a technical traffic study prepared by Urban Crossroads, Inc., titled "First Inland Logistics II Traffic Impact Analysis, City of Moreno Valley, California" and dated January 3, 2013 (*Technical Appendix F*). The report considers potential traffic impacts associated with construction and operation of the proposed Project and recommends improvements to mitigate impacts considered significant in comparison to stated thresholds. The traffic study was prepared in accordance with the City of Moreno Valley Transportation Engineering Division's *Traffic Impact Analysis Preparation Guide* (dated August 2007).

4.4.1 STUDY AREA DESCRIPTION

The study area for purposes of determining traffic impacts, as shown on Figure 4.4-1, *Project Study Area/ Intersection Locations*, is defined in conformance with the requirements of the City of Moreno Valley's Traffic Impact Analysis (TIA) Preparation Guide. Based on these guidelines, the minimum area to be studied shall include any intersection of "Collector" or higher classification street, with "Collector" or higher classification streets, at which the proposed Project would add 50 or more peak hour trips. The "50 peak hour trip" criteria utilized by the City of Moreno Valley is consistent with the methodology employed by other jurisdictions throughout Riverside County and generally represents a threshold of trips at which a typical intersection would have the potential to be impacted. Although each intersection may have unique operating characteristics, this traffic engineering rule of thumb is a valid and proven way to establish a study area (Urban Crossroads, 2013, p. 4). Intersections and connecting roadway segments that would not receive more than 50 peak hour trips from the Project are not included in the study area. Based on a comparison of the trip generation information provided in Table 4.4-1, *Project Trip Generation Summary*, with the trip distribution patterns depicted on Figure 4.4-2, *Project (Passenger Car) Trip Distribution*, and Figure 4.4-3, *Project (Truck) Trip Distribution*, the proposed Project would not contribute more than 50 peak hour trips to any road segments or intersections located within the City of Riverside or unincorporated Riverside County; thus, intersections and roadway segments in those jurisdictions do not warrant analysis.

A. Roadway Segments

A total of 28 roadway segments are identified in the study area for analysis based on a review of the key roadway segments in which the Project is anticipated to contribute 50 or more peak hour trips. Table 4.4-2, *Roadway Segment Analysis Locations*, provides a summary of the study area roadway segments, each with an ID number and jurisdiction noted. There are no future roadway segments that would be constructed as part of the Project. Refer to Figure 4.4-1, *Project Study Area/ Intersection Locations*, for Project study area roadway locations.

B. Intersections

A total of 13 intersections, as shown in Table 4.4-3, *Intersection Analysis Locations* are included in the Project study area based on the City's TIA analysis methodology and input from the City of Moreno Valley Traffic Engineering Division. An ID number is assigned to each intersection and jurisdictional locations are identified in Table 4.4-3. Intersections that would be developed as part of the Project and do not currently exist also are identified in Table 4.4-3.

C. Freeway Mainline Segments

Consistent with California Department of Transportation (Caltrans) traffic study guidelines, there are four (4) freeway mainline analysis locations in the Project study area, including segments on Interstate 215 (I-215 Freeway) on either side of the Harley Knox Boulevard interchange where the proposed Project is anticipated to contribute 100 or more two-way peak hour trips. The study area freeway mainline segments are identified in Table 4.4-4, *Freeway Mainline Segments*. All freeway mainline segments are under the jurisdiction of Caltrans.

D. Freeway Merge/Diverge Ramp Junctions

There are four (4) merge/diverge ramp junction locations in the Project's study area for the I-215 Freeway for both northbound and southbound directions of flow as shown in Table 4.4-5, *Freeway Merge/Diverge Ramp Junctions*. All freeway ramp junctions are under the jurisdiction of Caltrans.

4.4.2 EXISTING CONDITIONS

Regional access is provided to the Project site via I-215, which is located approximately 1.9 miles west of the site, and State Route 60 (SR-60), located approximately 4.9 miles north of the site. The 17.3-acre Project site is located in the City of Moreno Valley, immediately north of Nandina Avenue, immediately south of San Michele Road, and immediately east of Perris Boulevard. Figure 4.4-4, *City of Moreno Valley General Plan Circulation Element*, and Figure 4.4-5, *City of Moreno Valley General Plan Roadway Cross-Sections*, show the City's roadway designations and cross-sections for the major roads surrounding the Project site in the City of Moreno Valley.

A. Existing Traffic Counts

Manual AM and PM peak hour turning movement counts at study area intersections were collected by Urban Crossroads, Inc. in January 2010, March 2011, and October 2011. The counts include the vehicle classifications as shown below, per City of Moreno Valley TIA requirements:

- Passenger Cars
- 2-Axle Trucks
- 3-Axle Trucks
- 4 or More Axle Trucks

To represent the impact that large trucks, buses, and recreational vehicles have on traffic flow, all trucks were converted into Passenger Car Equivalents (PCEs) for the purpose of conducting the traffic analysis. By their size alone, these vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for large vehicles to accelerate and slowdown is also much longer than for passenger cars, and varies depending on the type of vehicle and number of axles. For the purpose of the Project's traffic impact analysis in *Technical Appendix F* and this EIR Subsection, a PCE factor of 1.5 was applied to 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4+-axle trucks to estimate each turning movement.

Existing (2012) average daily traffic (ADT) volumes on arterial highways throughout the study area are shown on Figure 4.4-6, *Existing (2012) Average Daily Traffic (ADT)*. Existing (2012) ADT volumes are based upon factored intersection peak hour counts collected by Urban Crossroads, Inc. using the following formula for each intersection leg:

PM Peak Hour (Approach Volume + Exit Volume) x 12 = Leg Volume

Based on a comparison of PM peak hour traffic count data to 24-hour traffic counts collected along roadway segments in close proximity to the study area, Urban Crossroads determined that the PM peak hour volumes are approximately eight (8) percent of the total 24-hour daily volume on select segments. As such, it was determined that the above equation could be utilized to approximate the ADT volume on the study area segments based on the same relationship (i.e., eight percent PM peak-to-daily relationship). Existing (2012) AM and PM peak hour intersection volumes are shown on Figure 4.4-7, *Existing (2012) AM Peak Hour Intersection Volumes*, and Figure 4.4-8, *Existing (2012) PM Peak Hour Intersection Volumes*, respectively. All of the traffic volumes illustrated on the exhibits and used in the traffic analysis are shown in terms of PCE (Urban Crossroads, 2013, p. 43).

B. Existing Roadway Conditions

Based on the methodology presented below in Subsection 4.4.3B, all 28 existing roadway segments in the study area operate at an acceptable level of service (LOS) (with 26 segments operating at LOS "A"). Existing (2012) ADT is shown on Figure 4.4-6. Table 4.4-6, *Existing (2012) Conditions Roadway Volume/Capacity Analysis*, summarizes the Existing (2012) conditions roadway segment capacity based on the methodology presented in Subsection 4.4.3B. All of the existing study area roadways operate at acceptable LOS during peak hours.

C. Existing Intersection Conditions

Figure 4.4-9, *Existing Number of Through Traffic Lanes and Intersection Controls*, shows the characteristics of each of the existing nine (9) Project study area intersections. (The other four (4) intersections in the study area, as shown in Table 4.4-8, *Intersection Analysis for Existing (2012) Conditions*, are future planned intersections that do not currently exist.) Based on the methodology presented in Subsection 4.4.3B, all of the existing study area intersections operate at acceptable LOS during peak hours. Existing (2012) AM and PM peak hour intersection volumes are shown on Figure 4.4-7 and Figure 4.4-8.

D. Existing Freeway Ramp Conditions

Ramp merge and diverge operations were evaluated for Existing (2012) baseline conditions. The results, as shown in Table 4.4-9, *I-215 Freeway Ramp Junction Merge/Diverge Analysis For Existing (2012) Baseline Conditions*, indicate that the I-215 Freeway ramp merge and diverge areas at Harley Knox Boulevard currently operate at LOS "E" or better during the peak hours under Existing (2012) baseline traffic conditions.

E. Existing Freeway Segment Conditions

Existing (2012) mainline directional volumes for the I-215 Freeway for the AM and PM peak hours are shown on Figure 4.4-10, *Existing (2012) Baseline I-215 Freeway Mainline Volumes*. As shown in

Table 4.4-10, *Existing (2012) Baseline Conditions Basic Freeway Segment Analysis*, I-215 Freeway segments in the study operate at an acceptable LOS during the peak hours for Existing (2012) traffic conditions.

F. Existing Mass Transit

The Project study area is served by the Riverside Transit Agency (RTA) with bus services along Perris Boulevard via Route 19. The nearest stops to the Project site for RTA Route 19 are on Perris Boulevard, south of San Michele Road (for southbound direction), north of Nandina Avenue (for the northbound direction) and south of Nandina Avenue (for the southbound direction). (Urban Crossroads, 2013, pp. 29, 38)

G. Existing Bicycle and Pedestrian Facilities

Field observations conducted by Urban Crossroads, Inc. in May 2012 indicate nominal pedestrian and bicycle activity within the study area (Urban Crossroads, 2013, p. 35). Figure 4.4-11, *City of Moreno Valley Master Plan of Trails,* shows that there are no trails or planned trails within the study area. Figure 4.4-12, *City of Moreno Valley Bike Plan,* shows planned bikeway routes in the area. A Class III bikeway is planned within the vicinity of the Project site along Indian Street north of San Michele Road and along San Michele Road west of Indian Street (Urban Crossroads, 2013, p. 38).

H. Existing Truck Routes

Figure 4.4-13, *City of Moreno Valley Truck Routes,* shows the designated truck route map for the City. Harley Knox Boulevard, Perris Boulevard, Indian Street, San Michele Road and Nandina Avenue are all designated truck routes. The map is used to predict the route of truck traffic under future conditions (Urban Crossroads, 2013, p. 38).

I. Existing Regional Transportation Programs and Plans

Provided below is a discussion of existing planning efforts, programs, and policies regarding transportation that have applicability to the proposed Project.

❑ County of Riverside Congestion Management Program (CMP)

The Riverside County CMP was prepared by the Riverside County Transportation Commission (RCTC) in accordance with Proposition 111, passed in June 1990. The CMP was established in the State of California to more directly link land use, transportation, and air quality and to prompt reasonable growth management programs that would more effectively utilize new and existing transportation funds, alleviate traffic congestion and related impacts, and improve air quality. Deficiencies along the CMP system must be identified when they occur so that improvement measures can be identified. Understanding the reason for these deficiencies and identifying ways to reduce the impact of future growth and development along a critical CMP corridor is intended to conserve scarce funding resources and help target those resources appropriately. In the vicinity of the Project site, I-215 is the only CMP Roadway (Riverside County Transportation Commission, 2010, pp. 2-5).

❑ City of Moreno Valley General Plan Circulation Element

The purpose of the City of Moreno Valley's Circulation Element is to ensure a complete, balanced, and well-maintained circulation system that relies on vehicular travel and transit, and incorporates alternative modes including bikeways and pedestrian facilities (City of Moreno Valley, 2006a). A primary objective of the Circulation Element is to ensure that the effects of future new development on the City's transportation system are understood and that the improvements needed to support new growth are planned and properly funded. Refer to Figure 4.4-4 and Figure 4.4-5 for illustrations of the City's Circulation Element exhibits.

❑ Riverside County Integrated Project (RCIP)

The RCIP is Riverside County's comprehensive, three-part, integrated program to determine future habitat conservation, transportation, and housing and economic needs in Riverside County. The RCIP addresses traffic congestion by addressing future traffic and multi-model circulation issues through the Community & Environmental Transportation Acceptability Process (CETAP). This element of RCIP identifies the locations for new transportation facilities that will help benefit commuters and serve Riverside County's growing economy. Selection of new transportation corridors are intended to be integrated with decisions on land use and environmentally sensitive areas (County of Riverside, 2003a).

❑ Regional Transportation Plan (RTP)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code §6500, also referred to as the Joint Powers Authority law. SCAG is designed as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. In 2012, SCAG prepared a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) with goals to: 1) align the plan investments and policies with improving regional economic development and competitiveness; 2) maximize mobility and accessibility for all people and goods in the region; 3) ensure travel safety and reliability for all people and goods in the region; 4) preserve and ensure a sustainable regional transportation system; 5) maximize the productivity of the transportation system; 6) protect the environment and health of residents by improving air quality and encouraging active transportation; 7) encourage and incentivize energy efficiency; 8) encourage land use and growth patterns that facilitate transit and non-motorized transportation; and 9) maximize the security of the transportation system (Southern California Association of Governments, 2012, p. 29). Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation.

4.4.3 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to transportation/traffic if the Project or any Project-related component would:

1. *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation*

system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;

2. *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;*

3. *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;*

4. *Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment);*

5. *Result in inadequate emergency access; or*

6. *Conflict with adopted policies or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.*

A. Determining Significance of Impacts

❑ Roadway Segments and Intersections

Based on the *City of Moreno Valley TIA Preparation Guide*, a significant direct traffic impact under CEQA occurs when the addition of project traffic causes an intersection that operates at an acceptable level of service (i.e., typically LOS "D" or better) to fall to an unacceptable level of service (i.e., typically LOS "E" or "F"). For purposes of determining the significance of impacts in this Subsection:

- If an intersection is projected to operate at an acceptable level of service without the Project and the addition of Project traffic as measured by 50 or more peak hour trips is expected to cause the intersection to operate at an unacceptable level of service the impact is considered a significant direct impact.
- If an intersection is projected to operate at an unacceptable level of service without the Project, and the Project contributes 50 or more peak hour trips, the impact is considered a significant direct impact.
- A significant cumulative impact is identified when a roadway segment or intersection is projected to operate at an unacceptable LOS with the addition of future traffic and a Project-related traffic increase of 50 or more peak hour trips. Cumulative traffic impacts are created as a result of a combination of the proposed Project together with other future developments contributing to the overall traffic impacts requiring additional improvements to maintain acceptable LOS operations with or without the Project. The Project's contribution to a cumulatively significant impact can be reduced to less-than-significant if the Project is required to implement or fund its fair share of improvements designed to alleviate the potential cumulative impact. If full funding of future cumulative improvements is not reasonably assured, a temporary unmitigated cumulative impact may occur until the needed improvement is fully funded and constructed.

❑ Freeway Segments and Ramp Junctions

RCTC has determined that freeway segments and ramp junctions that operate below LOS "E" should be identified and improved to an acceptable LOS; however, specific criteria to identify project-related impacts are not specified by RCTC or in the Caltrans Traffic Impact Study guidelines.

For the purposes of the analysis in this Subsection and in accordance with the adopted Riverside County CMP, if a freeway segment is projected to operate at an acceptable level of service (i.e., LOS "E" or better) without the Project and the Project is expected to cause the facility to operate at an unacceptable level of service (i.e., LOS "F"), the Project's direct impact is considered significant. If the facility would operate at a deficient LOS without the Project, the addition of 100 ADT or more of Project traffic would be considered a cumulative impact.

B. Methodology

❑ Level of Service

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS "A," representing completely free-flow conditions, to LOS "F," representing breakdown in flow resulting in stop-and-go conditions. LOS "E" represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow.

The definition of an intersection deficiency in the City of Moreno Valley is based on the City of Moreno Valley General Plan Circulation Element. The City of Moreno Valley General Plan states that target LOS "C" or LOS "D" be maintained along City roads (including intersections) wherever possible. Figure 4.4-14, *City of Moreno Valley Level of Service (LOS) Standards*, and Table 4.4-11, *Moreno Valley Roadway Segment Capacity LOS Thresholds*, shows the LOS standards and capacities within the City. Table 4.4-12, *Perris Roadway Segment Capacity LOS Thresholds1*, summarizes the City of Perris daily roadway segment capacities thresholds.

Caltrans, the County of Riverside, and the City of Perris have established explicit LOS performance criteria related to determining the significance of impacts on the roadway system within their jurisdictions. Generally, LOS "D" is considered to be the limit of acceptable traffic operations during the peak hour in these jurisdictions. LOS "D" is therefore used as the significance threshold in this Subsection for these jurisdictions, except for the intersections of I-215 Southbound Ramps/Harley Knox Boulevard and I-215 Northbound Ramps/Harley Knox Boulevard, which allow LOS "E" (per City of Perris General Plan Circulation Element Policy II.A). Daily roadway segment capacities thresholds for the City of Perris are summarized in Table 4.4-12. RCTC has adopted LOS "E" as the minimum standard for intersections and segments along the CMP System of Highways and Roadways. Therefore, for the purposes of the traffic impact analysis, LOS "E" is considered to be the limit of acceptable traffic operations for the I-215 Freeway mainline segments and ramp junctions (Urban Crossroads, 2013, p. 27).

❑ Roadway Segment Capacity Analysis

Roadway segment operations are evaluated using the City of Moreno Valley Daily Roadway Capacity Values provided in the *City of Moreno Valley TIA Preparation Guide*. Per the TIA Preparation Guide, daily roadway segments in the City of Moreno Valley should maintain the LOS capacities illustrated in Figure 4.4-14. Daily roadway segment capacities thresholds for the City of Perris are summarized in Table 4.4-12, *Perris Roadway Segment Capacity LOS Thresholds1*.

The daily roadway segment capacities for each type of roadway are summarized in Table 4.4-11 and Table 4.4-12. Roadway segment capacities are approximate figures only, and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet future traffic demands. These roadway capacities are "rule of thumb" estimates for planning purposes. As such, where the ADT-based roadway segment analysis indicates a deficiency (unacceptable LOS), a review of the more detailed peak hour intersection analysis and progression analysis is undertaken. The more detailed peak hour intersection analysis explicitly accounts for factors that affect roadway capacity. Therefore, roadway segment widening is typically only recommended if the peak hour intersection analysis indicates the need for additional through lanes. (Urban Crossroads, 2013, p. 20)

❑ Intersection Capacity Analysis

The intersection LOS analysis is based on the traffic volumes calculated for the peak hour conditions. The following peak hours were selected for analysis because these hours typically experience the most traffic during a 24-hour period:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

For signalized intersections, the City of Moreno Valley requires operations analysis based on the methodology described in Chapter 16 of the Highway Capacity Manual (HCM). Intersection LOS operations are based on an intersection's average control delay. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. For signalized intersections, LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation as described in Table 4.4-13, *Signalized Intersection LOS Thresholds*. For a more detailed discussion of intersection capacity analysis see Section 2.2 of *Technical Appendix F*.

For unsignalized intersections, the City of Moreno Valley requires that operations be evaluated using the methodology described in Chapter 17 of the HCM. The LOS rating is based on the weighted average control delay expressed in seconds per vehicle, as shown in Table 4.4-7. At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled movement and for the left turn movement from the major street, as well as for the intersection as a whole. For approaches composed of a single lane, the delay is computed as the average of all movements in that lane. For all-way stop controlled intersections, LOS is computed for the intersection as a whole. (Urban Crossroads, 2013, p. 19)

❑ Traffic Signal Warrant Analysis

The term "signal warrants" refers to the list of established criteria used by Caltrans and other public agencies to quantitatively justify or ascertain the potential need for installation of a traffic signal at an otherwise unsignalized intersection. The signal warrant criteria presented in the latest edition of the Federal Highway Administration's (FHWA) *Manual on Uniform Traffic Control Devices* (MUTCD), as amended by the *MUTCD 2003 California Supplement*, is used for all study area intersections.

Traffic signal warrant analyses were performed at the following unsignalized study area intersections: Western Way / Harley Knox Boulevard, Knox Street / Nandina Avenue, Driveway 1 / San Michele Road, Driveway 2 / Nandina Avenue, Driveway 3 / San Michele Road, and Driveway 4 / Nandina Avenue. A signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition does not require that a traffic control signal be installed at a particular location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. Signal warrants do not necessarily correlate with level of service. An intersection may satisfy a signal warrant condition and operate at or above LOS "C" or operate below LOS "C" and not meet a signal warrant. For more information on signal warrant methodology, refer to Section 2.6 of *Technical Appendix F* (Urban Crossroads, 2013, pp. 23, 24).

❑ Freeway Mainline Segment Analysis

The study area includes segments of the I-215 Freeway, from north of and south of Harley Knox Boulevard, and includes the freeway-to-arterial interchanges of the I-215 Freeway with the Harley Knox Boulevard ramps. Consistent with Caltrans requirements, the progression of vehicles has been assessed to determine potential queuing lengths at the freeway ramp intersections on Harley Knox Boulevard and the I-215 Freeway.

The traffic progression analysis tool and HCM intersection analysis program, HCS+ software, was used to assess the potential needs of the intersections with traffic added from the proposed Project. The performance measure preferred by Caltrans to calculate LOS is density. Density is expressed in terms of passenger cars per mile per lane. Table 4.4-11 illustrates the freeway segment LOS thresholds for each density range utilized for this analysis. For more information on queuing analysis methodology, refer to Section 2.4 of *Technical Appendix F*.

The Riverside County Transportation Commission (RCTC) has plans in place for the widening of the I-215 Freeway through the study area; however, a schedule for the widening of I-215 between Nuevo Road in the City of Perris and Box Springs Road in the City of Riverside has not be set, due to the state's ongoing budget challenges. The I-215 North Project will add a carpool lane (high-occupancy vehicle land) in each direction to a 10.75-mile section of the I-215 freeway. As such, the future expansion of the I-215 Freeway has been assumed for "with improvements" conditions only and not assumed as the base condition in the basic freeway segment analysis (Urban Crossroads, 2013, p. 22).

❑ Freeway Merge/Diverge Ramp Junction Analysis

The study area, I-215 from north of and south of Harley Knox Boulevard, was broken into four (4) segments defined by the freeway-to-arterial interchange locations. The merge/diverge analysis is

based on the HCM Ramps and Ramp Junctions analysis method and performed using HCS+ software. The results (reported in passenger car/mile/lane) are calculated based on the existing number of travel lanes, number of lanes at the on- and off-ramps both at the analysis junction and at upstream and downstream locations (if applicable), and acceleration/deceleration lengths at each merge/diverge point. Table 4.4-14, *Freeway Mainline LOS Thresholds*, presents the merge/diverge area LOS thresholds for each density range utilized for this analysis (Urban Crossroads, 2013, p. 23). Meters are not installed at the Harley Knox Boulevard/I-215 ramps; therefore, a ramp meter analysis is not required.

❑ Background Traffic

Future year traffic forecasts are based upon five (5) years of background (ambient) growth at 2% per year for 2017 traffic conditions. The ambient growth factor is intended to approximate regional traffic growth. The total ambient growth is 10.4% for 2017 traffic conditions (compounded growth of 2% per year over five years). This ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by known cumulative development projects analyzed by *Technical Appendix F*. According to information published by the Riverside County Center for Demographic Research (RCCDR) and used as the basis for completing the *Western Riverside Council of Governments (WRCOG) Transportation Uniform Mitigation Fee (TUMF) Nexus Study – 2009 Program Update*, the population of Western Riverside County is projected to increase by 62% in the period between 2007 and 2035, a compounded rate of approximately 1.73% annually. During the same period, employment in Western Riverside County is expected to increase by 111% or 2.71% annually. Therefore, the use of an annual growth rate of 2.0% is consistent with the anticipated regional growth in traffic volumes (Urban Crossroads, 2013, p. 57).

❑ Cumulative Impact Analysis

CEQA Guidelines §15130 requires that an EIR include the discussion of a Project's cumulative impacts. For the purpose of analyzing the proposed Project's cumulative effects on traffic, and in accordance with the *City of Moreno Valley's TIA Preparation Guide* (dated August 2007), a comprehensive list of 53 other known approved or reasonably foreseeable development projects in the study area was compiled. See Figure 4.4-15, *Cumulative Development Projects Location Map*, for locations of the development projects considered. Information about each development project can be found in Section 4.6 of *Technical Appendix F*. These 52 projects are calculated to generate 248,824 net passenger car equivalent (PCE) trip-ends per day during a typical weekday with approximately 21,484 net PCE vehicle trips during the AM peak hour and 25,545 net PCE vehicle trips during the PM peak hour. For specific projects not listed that fall outside of the study area, the traffic from those projects is captured by the 2.0% compounded annual growth rate.

Based on the identified trip distribution patterns for the cumulative development projects on arterial highways throughout the study area, cumulative development ADT volumes, AM peak hour, and PM peak hour intersection turning movement volumes are shown on Figure 4.4-16, *Cumulative Development Average Daily Traffic (ADT), Figure 4.4-17, Cumulative Development AM Peak Hour Intersection Volumes*, and Figure 4.4-18, *Cumulative Development PM Peak Hour Intersection Volumes*, respectively.

4.4.4 IMPACT ANALYSIS

Threshold 1:	***Would the proposed Project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?***

The Project proposes to construct two (2) driveways onto San Michele Road, construct two (2) driveways onto Nandina Avenue, and improve the site-adjacent roadways Nandina Avenue, Perris Boulevard, and San Michele Road. The proposed roadway improvements are described in Section 3.0, *Project Description*, and will be enforced as part of the Project's Conditions of Approval, which will be issued by the City of Moreno Valley prior to consideration of the proposed Project by the City Council. The construction of these roadway improvements is assumed throughout the analyses. The analysis of Threshold 1 focuses on potential impacts to local roadways, based on acceptable LOS standards established by the City of Moreno Valley General Plan and the general plans of surrounding jurisdictions. Refer to Threshold 2 for Analysis of potential impacts to I-215 based on acceptable LOS standards established by the Riverside County Congestion Management Plan.

A. Project Trip Generation and Distribution

Trip generation represents the amount of traffic that is attracted to and produced by a development project. Determining traffic generation for a specific project is therefore based upon forecasting the amount of traffic that is expected to be both attracted to and produced by the specific land uses proposed for a given development. In an effort to accurately estimate the number of vehicle trips that the proposed Project would generate, estimations are based on trip generation rates collected by the Institute of Transportation Engineers (ITE) and presented in ITE's most recent edition of *Trip Generation* (8th Edition, 2008). Detailed information about the methodology used to determine the Project's trip generation is provided in Section 4.1 of *Technical Appendix F*.

Assumed to be built and fully operational by Year 2017, the Project is proposed to consist of 400,130 square feet of high-cube/distribution warehouse use. Using that development potential, the proposed Project would produce an estimated 1,066 daily vehicle trips, including 67 during the AM Peak Hour and 74 during the PM Peak Hour. A summary of the Project's trip generation is provided in Table 4.4-1. The traffic reducing potential of using public transit, walking, or bicycling by employees of the Project has not been considered, which have the potential to reduce the forecasted traffic volumes. Because these factors were not considered in the analysis (and would reduce the volume of Project-related vehicular traffic if considered), the analysis of impacts to transportation/traffic in this subsection represents a conservative analysis of potential impacts.

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that would be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered, to identify the routes where Project traffic would distribute. The Project trip distribution was developed based on anticipated travel patterns to and from the Project site for both passenger cars and truck traffic. The truck trip distribution patterns were developed based on the anticipated travel patterns for high-cube warehousing trucks. The total volume on each roadway was divided by the Project's total traffic generation to indicate the

percentage of Project traffic that would use each component of the regional roadway system in each relevant direction. The Project passenger car trip distribution pattern is graphically depicted on Figure 4.4-2, and the Project truck trip distribution pattern is graphically depicted on Figure 4.4-3.

The assignment of traffic from the Project area to the adjoining roadway system is based on the Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of Project occupancy (2017). Based on the identified Project traffic generation and trip distribution patterns, Project ADT volumes for the weekday are shown on Figure 4.4-19, *Project Only Average Daily Traffic (ADT),* and Project AM and PM peak hour intersection turning movement volumes are shown on Figure 4.4-20, *Project Only AM Peak Hour Intersection Volumes,* and Figure 4.4-21, *Project Only PM Peak Hour Intersection Volumes,* respectively. Detailed information about the methodology used to determine the Project's trip distribution is provided in Section 4.2 of *Technical Appendix F.*

B. Analysis Scenarios

Pursuant to the City of Moreno Valley's *TIA Preparation Guide*, all traffic impact analyses must be "…projected to the year that the project is estimated to be complete (minimum of five years)." (City of Moreno Valley, 2007). The Notice of Preparation for this EIR was distributed for public review on December 3, 2012; thus, the opening year for the proposed Project is assumed to be five years later (Year 2017). Therefore, for the purpose of the traffic impact analysis presented below, potential impacts to traffic and circulation are assessed for each of the following:

- Existing (2012) plus Project Conditions (1 scenario) (E+P)
- Opening Year (2017) without Project and Opening Year (2017) with Project (2 scenarios) – ambient growth only (E+A and E+A+P, respectively).
- Opening Year Cumulative (2017) without Project and Opening Year Cumulative (2017) with Project (2 scenarios) – ambient growth and cumulative development projects (E+A+C and E+A+C+P, respectively).

Information for Existing (2012) conditions is disclosed above in Subsection 4.4.2 and represents the baseline traffic conditions as they existed at the time this analysis was prepared (2012).

The Existing (2012) plus Project (E+P) analysis determines direct Project-related traffic impacts that would occur on the existing roadway system in the theoretical scenario of the Project being placed upon existing conditions. Because the Project would not be fully built and occupied until after 2012, the E+P scenario is presented to disclose direct impacts as required by CEQA.

The Opening Year (2017) analysis determines the Project-related traffic impacts based on a comparison of the Existing plus Ambient Growth plus Project (E+A+P) traffic conditions to the Existing (2012) and Existing plus Ambient Growth (E+A) conditions. The Opening Year (2017) conditions analysis uniquely identifies the specific traffic impacts associated with the development of the proposed Project. To account for background traffic, a total ambient growth from Existing (2012) conditions of 10.4% (2% per year over 5 years, compounded annually) is included for Opening Year (2017) conditions. Cumulative development projects are not included as part of the Opening Year (2017) analysis. The Opening Year (2017) analysis is intended to identify the direct impacts

associated solely with the development of the proposed Project based on the expected background growth within the study area.

The Opening Year Cumulative (2017) conditions analysis is utilized to determine if improvements funded through local and regional transportation mitigation fee programs such as the TUMF program, City of Moreno Valley Development Impact Fee (DIF) program, or other approved funding mechanism can accommodate the cumulative traffic at the target LOS identified in the City of Moreno Valley General Plan or planning documents of other jurisdictions. If the funded improvements can provide the target LOS, then the Project's payment into the TUMF and DIF is considered to be adequate cumulative mitigation as imposed through Conditions of Approval applied to the Project by the City of Moreno Valley. If other improvements are needed beyond the funded improvements (such as localized improvements to non-TUMF or non-DIF facilities), they are identified as such.

To account for background traffic in Opening Year Cumulative (2017), 53 other known cumulative development projects in the study area are included in addition to the 10.4% ambient. This comprehensive list of cumulatively projects was compiled from information provided by the City of Moreno Valley Planning Department.

C. Existing (2012) Plus Project Traffic Analysis (E+P)

For purposes of full disclosure and in an effort to satisfy CEQA Guidelines §15125(a), this subsection presents an analysis of existing traffic volumes plus traffic generated by the proposed Project (Existing plus Project, or E+P). The reason this particular analysis scenario is provided is to disclose the potential for direct impacts to the existing environment as required by CEQA. The E+P scenario rarely materializes as an actual scenario in the real world. The time period between the date when a Notice of Preparation for an EIR is issued and the date project buildout occurs can often be a period of several years or more. During this time period, conditions are not static. Other projects are being constructed, the transportation network is evolving, and traffic patterns are changing. Therefore, the E+P scenario is very unlikely to materialize in real world conditions and thus does not accurately describe the environment that exists when a particular project is constructed and becomes operational. Regardless, the E+P scenario is analyzed to satisfy CEQA requirements to identify the Project's impacts to the existing environment.

Average daily traffic (ADT) for the E+P conditions is shown on Figure 4.4-22, *Existing Plus Project Average Daily Traffic (ADT)*, and AM and PM peak hour intersection turning movement volumes for E+P are shown on Figure 4.4-23, *Existing Plus Project AM Peak Hour Intersection Volumes*, and Figure 4.4-24, *Existing Plus Project PM Peak Hour Intersection Volumes*.

❑ E+P Roadway Segments Analysis

Roadway segment capacities for E+P conditions were analyzed based on the methodology discussed in Subsection 4.4.3B. Out of 28 study area roadway segments (Table 4.4-2), all segments would operate at an acceptable LOS (with 25 segments operating at LOS "A") with the addition of Project traffic to the existing condition. Table 4.4-15, *Existing Plus Project Conditions Roadway Volume/Capacity Analysis*, summarizes the E+P conditions roadway segment capacity analysis based on the LOS thresholds identified in Table 4.4-12 and Table 4.4-11; therefore, impacts to study area roadway segments under the E+P condition would be less than significant.

❑ E+P Intersections Analysis

E+P peak hour traffic operations were evaluated for study area intersections based on the methodologies presented in Subsection 4.4.3B. In the E+P condition, of the 9 existing study area intersections, all intersections would operate at an acceptable LOS D or better during the peak hours. Table 4.4-16, *Intersection Analysis for Existing Plus Project Conditions*, summarizes the AM and PM peak hour study area intersection LOS for the Existing (2012) conditions plus the Project. Therefore, impacts to study area intersections under the E+P scenario would be less than significant.

D. Opening Year Traffic Analysis (Opening Year (2017))

The Opening Year (2017) conditions analysis determines the Project-related traffic impacts based on a comparison of the Existing plus Ambient Growth plus Project (E+A+P) traffic conditions to the Existing (2012) and Existing plus Ambient Growth (E+A) conditions. The Opening Year (2017) conditions analysis uniquely identifies the specific traffic impacts associated with the development of the proposed Project. The Opening Year (2017) analysis is intended to identify the project-specific impacts associated solely with the development of the proposed Project based on the expected background growth within the study area (Urban Crossroads, 2013, p. 81).

The intersection lane configurations and traffic controls assumed to be in place for Opening Year (2017) conditions are consistent with those assumed for existing conditions (see previous Figure 4.4-6) with the following exceptions:

- The analysis for the intersection of Perris Boulevard at San Michele Road assumes the following geometrics, which are anticipated to be in place by Year 2013: one northbound left turn lane, two northbound through lanes, one northbound shared through-right turn lane, one southbound left turn lane, two southbound though lanes, one southbound shared through-right turn lane, one eastbound left turn lane, one eastbound through lane, one eastbound right turn lane, one westbound left turn lane, one westbound through lane and one westbound right turn lane.
- The analysis for the intersection of Perris Boulevard at Nandina Avenue assumes the following geometrics, which are anticipated to be in place by Year 2013: one northbound left turn lane, two northbound through lanes, one northbound shared through-right turn lane, one southbound left turn lane, three southbound through lanes, one southbound right turn lane with overlap phasing, one eastbound left turn lane, one eastbound through lane, one eastbound shared through-right turn lane, one westbound left turn lane, one westbound through lane and one westbound right turn lane.
- At Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for Opening Year (2017) with Project conditions only.

ADT volumes for the Opening Year (2017) Without Project (E+A) conditions are shown on Figure 4.4-25, *Opening Year (2017) Without Project Average Daily Traffic (ADT)*, and AM and PM peak hour intersection turning movement volumes for Opening Year (2017) Without Project (E+A) conditions are shown on Figure 4.4-26, *Opening Year (2017) Without Project AM Peak Hour*

Intersection Volumes, and Figure 4.4-27, *Opening Year (2017) Without Project PM Peak Hour Intersection Volumes.* ADT volumes for the Opening Year (2017) With Project (E+A+P) conditions are shown on Figure 4.4-28, *Opening Year (2017) With Project Average Daily Traffic (ADT)*, and AM and PM peak hour intersection turning movement volumes for Opening Year (2017) With Project (E+A+P) conditions are shown on Figure 4.4-29, *Opening Year (2017) With Project AM Peak Hour Intersection Volumes*, and Figure 4.4-30, *Opening Year (2017) With Project PM Peak Hour Intersection Volumes*.

❑ Opening Year (2017) Roadway Segments Analysis

Roadway segment capacities for Opening Year (2017) Without Project (E+A) and with Project (E+A+P) conditions were determined based on the methodology discussed in Subsection 4.4.3B. Table 4.4-17, *Opening Year (2017) Conditions Roadway Volume/Capacity Analysis1*, summarizes the Opening Year (2017) Without Project (E+A) and With Project (E+A+P) conditions roadway segment capacity analysis based on the LOS thresholds identified in Table 4.4-11. As shown in Table 4.4-17, all 28 roadway segments within the study area would operate at an acceptable LOS under the E+A scenario. With the addition of Project traffic for Opening Year (2017) (E+A+P), all 28 roadway segments would continue to operate at an acceptable LOS; therefore, the proposed Project would result in a less than significant impact to study area road segments under opening year (2017) conditions.

❑ Opening Year (2017) Intersections Analysis

Opening Year (2017) Without Project (E+A) and With Project (E+A+P) peak hour traffic operations were evaluated for study area intersections based on the methodologies presented in Subsection 4.4.3B. Table 4.4-18, *Intersection Analysis for Opening Year (2017) Conditions*, summarizes the Opening Year (2017) Without Project (E+A) peak hour traffic operations. As shown in Table 4.4-18, all 13 study area intersections would operate at an acceptable LOS during peak hours in the E+A condition.

As shown on Table 4.4-18, with the addition of Project traffic (E+A+P) and implementation of improvements to Perris Boulevard by the Project Applicant along the Project site's frontage, all 13 study area intersections would operate at an acceptable LOS D or better. The Project would not contribute to a deficient LOS at any study area intersection; therefore, the Project's impact to intersections is less than significant (Urban Crossroads, 2013, pp. 81-90).

E. Opening Year Cumulative Traffic Analysis (Cumulative (2017))

As discussed in Subsection 4.02, CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. The Opening Year Cumulative (2017) analysis determines the Project-related traffic impacts based on a comparison of the traffic volumes expected in 2017 without and with development of the proposed Project, including background traffic from cumulative development projects. To account for background traffic, 53 other known cumulative development projects in the study area were included in addition to 10.4% of ambient growth (refer to Subsection 4.4.3B, for a description of the methodology used for this analysis). The analysis of cumulative traffic impacts for Opening Year (2017) uses the methodology that is required by the *City of Moreno Valley TIA Preparation Guide* (dated August 2007). The lane configurations

and traffic controls assumed to be in place for Opening Year Cumulative (2017) conditions are the same as described above for Opening Year (2017) conditions (Urban Crossroads, 2013, p. 99).

ADT volumes for the Opening Year Cumulative (2017) Without Project (E+A+C) conditions are shown on Figure 4.4-31, *Opening Year Cumulative (2017) Without Project Average Daily Traffic (ADT)*, and AM and PM peak hour intersection turning movement volumes for Opening Year Cumulative (2017) Without Project (E+A+C) conditions are shown on Figure 4.4-32, *Opening Year Cumulative (2017) Without Project AM Peak Hour Intersection Volumes*, and Figure 4.4-33, *Opening Year Cumulative (2017) Without Project PM Peak Hour Intersection Volumes*.

ADT volumes for the Opening Year Cumulative (2017) With Project (E+A+C+P) conditions are shown on Figure 4.4-34, *Opening Year Cumulative (2017) With Project Average Daily Traffic (ADT)*, and AM and PM peak hour intersection turning movement volumes for Opening Year Cumulative (2017) With Project (E+A+C+P) conditions are shown on Figure 4.4-35, *Opening Year Cumulative (2017) With Project AM Peak Hour Intersection Volumes*, and Figure 4.4-36, *Opening Year Cumulative (2017) With Project PM Peak Hour Intersection Volumes*.

❑ Opening Year Cumulative (2017) Roadway Segments Analysis

Roadway segment capacities for Opening Year Cumulative (2017) Without Project (E+A+C) and With Project (E+A+P) conditions were analyzed based on the methodology discussed in Subsection 4.4.3B.

Table 4.4-19, *Opening Year Cumulative (2017) Conditions Roadway Volume/Capacity Analysis*, identifies the LOS of study area roadway segments under Opening Year Cumulative (2017) conditions for both with and without Project traffic. Additionally, Table 4.4-19 summarizes the Opening Year Cumulative (2017) Without Project (E+A+C) and With Project (E+A+C+P) LOS based on the thresholds identified in Table 4.4-13. As shown in Table 4.4-19, under E+A+C conditions, 21 of the 28 study area roadway segments would operate at an acceptable LOS without the addition of Project traffic, while seven (7) roadway segments would operate at an unacceptable LOS. As shown in Table 4.4-19, with the addition of Project traffic, the LOS for all study area roadway segments would remain unchanged. As such, Project traffic would not directly cause any roadway segments to degrade to a deficient LOS under Opening Year Cumulative (2017) conditions. Because the Project would add 50 or more peak hour trips to these seven (7) segments, the impact is considered a significant cumulative impact. The seven (7) cumulatively impacted segments are:

- Harley Knox Boulevard, between I-215 NB Ramps and Western Way;
- Harley Knox Boulevard, East of Western Way;
- Harley Knox Boulevard, West of Patterson Avenue;
- Harley Knox Boulevard, East of Patterson Avenue;
- Harley Knox Boulevard, West of Indian Street;
- Indian Street, South of Nandina Avenue;
- Indian Street, North of Harley Knox Boulevard

An analysis of these roadway segments by Urban Crossroads concluded that all of the roadway segments are anticipated to operate at acceptable LOS with improvements to adjacent study area intersections (including the addition of some through lanes) without the need for additional roadway widening discussed in Subsection 4.4.8 (Urban Crossroads, 2013, p. 106).

❑ Opening Year Cumulative (2017) Intersections Analysis

Opening Year Cumulative (2017) Without Project (E+A+C) and With Project (E+A+C+P) peak hour traffic operations were evaluated for study area intersections based on the methodologies presented in Subsection 4.4.3B. As shown in Table 4.4-20, *Intersection Analysis for Opening Year Cumulative (2017) Conditions*, eight (8) of the 13 study area intersections would operate at an acceptable LOS, while the remaining five (5) intersections would operate at unacceptable LOS "F" during one or both of the peak hours for Opening Year (2017) Without Project (E+A+C) conditions.

Figure 4.4-32 and Figure 4.4-33, summarize the AM and PM peak hour study area intersection LOS for Opening Year (2017) Without Project (E+A+C) conditions. Figure 4.4-35 and Figure 4.4-36 summarize the AM and PM peak hour study area intersection LOS for Opening Year (2017) With Project (E+A+C+P) conditions, consistent with the summary provided in Table 4.4-19.

As shown in Table 4.4-20, the addition of Project traffic would not cause any additional study area intersections to operate at unacceptable peak hour LOS beyond those previously identified under Opening Year Cumulative (2017) Without Project conditions (E+A+C). The intersection of Perris Boulevard at Nandina Avenue is anticipated to operate at acceptable peak hour operations with the site-adjacent Project improvements in place along Perris Boulevard. Because Project traffic would contribute 50 or more peak hour trips to the five (5) remaining intersections that would be impacted under E+A+C+P conditions, Project impacts to these five (5) intersections, listed below, would be cumulatively significant.

- I-215 Southbound Ramps/ Harley Knox Boulevard;
- I-215 Northbound Ramps/ Harley Knox Boulevard;
- Western Way/ Harley Knox Boulevard;
- Patterson Avenue/ Harley Knox Boulevard;
- Indian Street/ Harley Knox Boulevard;

Threshold 2:	***Would the proposed Project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?***

The Riverside County Congestion Management Plan (CMP) prepared by the Riverside County Transportation Commission (RCTC) is applicable to the Project because I-215 is a CMP Roadway and occurs within the Project's study area (Riverside County Transportation Commission, 2010, pp. 2-5).

The study area for the mainline analysis includes segments of the I-215 Freeway, from north of and south of Harley Knox Boulevard, and includes the freeway-to-arterial interchanges of the I-215

Freeway with the Harley Knox Boulevard ramps. As shown on Figure 4.4-2, *Project (Passenger Car) Trip Distribution*, it is estimated that 40% of passenger cars accessing the Project site would use I-215. As shown on Figure 4.4-3, *Project (Truck) Trip Distribution*, it is estimated that 100% of trucks accessing the Project site would use I-215.

For the purpose of analysis, I-215 in the study area (from north of Harley Knox Boulevard to south of Harley Knox Boulevard) has been broken into segments defined by the freeway-to-arterial interchange locations. As noted previously, the RCTC has plans in place for the widening of I-215 through the study area; however, a schedule for the widening has not been set due to the state's ongoing budget challenges (Urban Crossroads, 2013, p. 24). As such, the future widening was not assumed as the base condition. Widening of the I-215 Freeway as planned by RCTC is noted in the analysis of future conditions as "with improvements" only. The same analysis scenarios presented above under Threshold 1 (E+P, E+A+P, and E+A+C+P) are analyzed below and in *Technical Appendix F*.

A. Existing (2012) Plus Project CMP Analysis (E+P)

As previously stated, for purposes of full disclosure and in an effort to satisfy CEQA Guidelines §15125(a), this subsection presents an analysis of existing traffic volumes plus traffic generated by the proposed Project (Existing plus Project, or E+P). The E+P scenario rarely materializes as an actual scenario in the real world because conditions are not static. Other projects are being constructed, the transportation network is evolving, and traffic patterns are changing. Regardless, the E+P scenario is analyzed to satisfy CEQA requirements to identify the Project's impacts to the existing environment.

❑ E+P Freeway Segment Analysis

E+P mainline directional volumes for I-215 for the AM and PM peak hours are shown on Figure 4.4-37, *Existing Plus Project I-215 Freeway Mainline Volumes*. As shown in Table 4.4-21, *Existing Plus Project Conditions Basic Freeway Segment Analysis*, I-215 Freeway segments in the study area operate at LOS "C" or better during the peak hours for E+P traffic conditions. The addition of Project traffic would not degrade the LOS. Project-related impacts would thus be less than significant.

❑ E+P Freeway Ramp Analysis

A traffic progression analysis was performed for the I-215 Freeway ramp merge and diverge areas. As shown in Table 4.4-22, *I-215 Freeway Ramp Junction Merge/Diverge Analysis For Existing Plus Project Conditions*, the ramp merge and diverge areas would operate at acceptable LOS "E" or better during the peak hours under E+P traffic conditions. The addition of Project traffic would not degrade the LOS. Project-related impacts would thus be less than significant.

B. Opening Year CMP Analysis (Opening Year (2017))

The Opening Year (2017) conditions analysis determines the Project-related effects on I-215 based on a comparison of the Existing plus Ambient Growth plus Project (E+A+P) traffic conditions to the Existing (2012) and Existing plus Ambient Growth (E+A) conditions.

❑ Opening Year (2017) Freeway Segment Analysis

Opening Year (2017) mainline directional volumes for I-215 for the AM and PM peak hours (Without and With Project) are shown on Figure 4.4-38, *Opening Year (2017) Without Project I-215 Freeway Mainline Volumes*, and Figure 4.4-39, *Opening Year (2017) With Project I-215 Freeway Mainline Volumes*. As shown in Table 4.4-23, *Opening Year (2017) Conditions Basic Freeway Segment Analysis*, I-215 Freeway segments in the study area would operate at an acceptable LOS during the peak hours for Opening Year (2017) Without and With Project traffic conditions. Project-related impacts would thus be less than significant.

❑ Opening Year (2017) Freeway Ramp Analysis

As shown in Table 4.4-24, *I-215 Freeway Ramp Junction Merge/Diverge Analysis For Opening Year (2017) Conditions*, the I-215 Freeway ramp merge and diverge areas are expected to operate at acceptable service levels for Opening Year (2017) traffic conditions, both Without and With the Project. Project-related impacts would thus be less than significant.

C. Opening Year Cumulative (2017) Traffic Analysis

As discussed in Subsection 4.02, CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. The Opening Year Cumulative (2017) analysis determines the Project-related traffic impacts based on a comparison of the traffic volumes expected in 2017 without and with development of the proposed Project, including background traffic from cumulative development projects. Refer to Subsection 4.4.3B, for a description of the methodology used for this analysis.

❑ Opening Year Cumulative (2017) Freeway Segment Analysis

Opening Year Cumulative (2017) mainline directional volumes for I-215 for the AM and PM peak hours (without and with Project) are shown on Figure 4.4-40, *Opening Year Cumulative (2017) Without Project I-215 Freeway Mainline Volumes*, and Figure 4.4-41, *Opening Year Cumulative (2017) With Project I-215 Freeway Mainline Volumes*. As shown in Table 4.4-25, *Opening Year Cumulative (2017) Conditions Basic Freeway Segment Analysis*, the study area mainline segments would operate at acceptable LOS during the peak hours for Opening Year Cumulative (2017) Without and With Project traffic conditions; therefore, the Project would have a less than significant impact to freeway segments.

❑ Opening Year Cumulative (2017) Freeway Ramp Analysis

As shown in Table 4.4-26, *I-215 Freeway Ramp Junction Merge/Diverge Analysis For Opening Year Cumulative (2017) Conditions*, the ramp junctions along the I-215 Freeway are projected to operate at acceptable service levels for both Opening Year (2017) Without and With Project conditions (i.e., LOS "E" or better); therefore, the Project would have a less than significant impact to freeway ramps.

Threshold 3: Would the proposed Project 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?

The proposed Project does not contain an air travel component; thus, air traffic volumes would not be changed as a result of the Project.

The Project site is located approximately 0.9-mile to the east of the March Air Reserve Base and March Inland Port Airport ARB/IPA. The Riverside County Airport Land Use Commission (RCALUC) is the local airport land use commission for airports within Riverside County, and pursuant to the California State Aeronautics Act (Public Utility Code §21670 et seq.) is tasked with preparing and adopting an airport land use compatibility plan, and for reviewing proposed plans, regulations, and other actions of local agencies and airport operators for consistency with the plan.

The proposed Project site is located within the March ARB Joint Land Use Study Compatibility Zone D. Compatibility Zone D is intended to encompass places where aircraft fly below about 3,000 feet above the airport elevation either on arrival or departure. Additionally, it includes locations near the primary flight paths where aircraft noise may regularly be loud enough to be disruptive. Direct overflights of these areas may occur occasionally. Risk levels in this zone are considered low and Zone D is not subject to significant safety hazards; therefore, the proposed Project would not introduce a safety risk and would not cause a change in traffic patterns. No impacts would occur (March Joint Powers Authority, 2010).

Threshold 4: Would the proposed Project substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

The proposed Project (described in Section 3.0, Project Description) is consistent with the property's land use designations as applied by the City of Moreno Valley General Plan and the Moreno Valley Industrial Area Plan (Specific Plan 208), as well as the property's zoning designation. As such, there would be no transportation hazards created as a result of an incompatible land use. The Project proposes to construct and operate one warehouse distribution building in an area of the City of Moreno Valley that is planned for such development and is adjacent to the City's designated truck route. To reduce inadvertent wrong turns, signs are proposed to be posted at the Project's exit driveways directing vehicles to the truck route.

The City of Moreno Valley Transportation Engineering Division has reviewed the Project's application materials (refer to Section 3.0, Project Description) and determined that no hazardous transportation design features would be introduced by the Project; therefore, the Project would have a less than significant impact because it would not result in increased hazards from a design feature and/or incompatible uses.

Threshold 5: Would the proposed Project result in inadequate emergency access?

Adequate emergency access would be provided to the Project site. Buildout of the proposed Project would result in one new distribution warehouse building on the Project site, which would increase the need for emergency access to and from the site. During the course of the City of Moreno Valley's

required review of the proposed Project (refer to Section 3.0, Project Description), the Project's transportation design was reviewed by the City's Transportation Engineering Division to ensure that adequate access to and from the site would be provided for emergency vehicles. Furthermore, Conditions of Approval will be issued by the City of Moreno Valley prior to consideration of the proposed Project by City Council, and will require that the Project provide adequate paved access to and from the site and its building. With required adherence to City requirements for emergency vehicle access, impacts would be less than significant.

Threshold 6: Would the proposed Project conflict with adopted policies or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The proposed Project consists of one new distribution warehouse building, which is a land use that is not likely to attract large volumes of pedestrian, bicycle, or transit traffic. (Field observations indicate nominal pedestrian and bicycle activity within the study area (Urban Crossroads, 2013, p. 35)). Regardless, the Project is designed to comply with all applicable transportation policies.

The Project is designed to accommodate pedestrians via sidewalks provided along adjacent public roadways. A Class III bikeway is designated along Indian Street north of San Michele Road and along San Michele Road, west of Indian Street, in conformance with the General Plan's Bikeway Plan. Perris Boulevard and Nandina Avenue are not identified as bikeways per the General Plan Bikeway Plan (as shown on Figure 4.4-12) and pursuant to the policies of the MVIAP, bikeways are not required and not proposed along the proposed Project's frontage with Perris Boulevard and Nandina Avenue. Landscaping is designed to be installed along the Project's perimeter, which would separate the adjacent public roadway rights-of-way (and their associated streetscapes, sidewalks, and bikeways) from the proposed Project's interior, eliminating any conflict between Project operations and the sidewalks and bikeways of perimeter roadways. As required by the City, bike racks would be provided at the building. A transit turnout also is proposed along the Project's frontage with Perris Boulevard, as requested by RTA to implement a transit service stop adjacent to the Project site. All Project driveways would be stop-sign controlled and sight distance at each Project driveway is required to be reviewed by the City of Moreno Valley at the time improvement plans are submitted to ensure that sight distance meets City standards. Off site, trucks accessing the Project are required to use approved truck routes, which would reduce conflicts associated with safety of the multi-model circulation system. The Project would not conflict with adopted policies or programs; therefore, impacts would be less than significant.

4.4.5 CUMULATIVE IMPACT ANALYSIS

The analysis under Threshold 1 determined the Project's potential to affect the transportation network on a direct or cumulative basis. As concluded under Threshold 1, the addition of Project traffic to the existing and planned circulation network would make a cumulatively considerable contribution to seven (7) roadway segments and five (5) intersections in Opening Year Cumulative (2017) Conditions. Table 4.4-20 summarizes the Opening Year Cumulative (2017) intersection conditions.

The analysis under Threshold 2 determined the Project's potential to affect I-215 on a direct or cumulative basis. As concluded under Threshold 2, the addition of Project traffic to the existing and

planned circulation network would not contribute to an unacceptable LOS condition on freeway mainlines and ramp junctions; therefore, the Project would make a less than cumulatively considerable impact on the I-215 freeway mainline segments and ramp junctions.

The proposed Project has no potential to contribute to significant cumulative impacts under the topics discussed under Thresholds 3, 4, and 5 because the Project has no potential to cumulatively result in changes to air traffic patterns, to result in cumulatively considerable transportation design safety concerns, or to adversely affect emergency access on a cumulative basis.

Regarding Threshold 6, the Project would not conflict with adopted policies or programs regarding public transit, bicycle, or pedestrian facilities and thus has no potential to contribute to a cumulative impact. The Project incorporates bicycle racks, sidewalks, and a transit turnout into its design to facilitate local and regional plans for a multi-model transportation network. The Project consists of one distribution warehouse building, which is likely to attract passenger cars and trucks and only small volumes of pedestrian, bicycle, or transit traffic. Landscaping is designed to be installed along the Project's perimeter and all Project driveways would be reviewed for adequate sight distance before construction and be stop-sign controlled. Trucks would be directed to the approved truck route by signs posted at Project exit driveways. The Project would have a less than significant cumulatively considerable impact and is consistent with adopted policies and programs regarding public transit, bicycle, and pedestrian facilities.

4.4.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold 1: Significant Cumulative Impact (Near-Term). The proposed Project would result in cumulatively considerable significant impacts to the existing and planned roadway network by contributing traffic to facilities that would operate at deficient levels of service with or without the addition of Project traffic. Project traffic would make a cumulatively considerable contribution to identified cumulative impacts at seven (7) roadway segments and five (5) intersections in Opening Year Cumulative (2017) Conditions. With required payment of City of Moreno Valley DIF fees and TUMF fees (see MM 4.4-4) and implementation of the DIF and TUMF-funded improvements at the cumulatively impacted facilities, all cumulatively impacted roadway segments and intersections in Opening Year Cumulative (2017) Conditions would be reduced to a less than significant impact with the exception of two (2) intersections: Western Way/Harley Knox Boulevard (Project's traffic contribution is 3.3%) and Indian Street/ Harley Knox Boulevard (Project's traffic contribution is 3.5%)). Although improvements are anticipated to relieve these deficiencies in the long-term along Harley Knox Boulevard, funded by the North Perris Road Bridge and Benefit District, there is no assurance that the improvements will be in place at the time of the proposed Project's Opening Year Cumulative (2017) Conditions. Thus, the cumulative impact is considered a near-term impact, until such time as the intersection improvements are in place.

Threshold 2: Less than Significant Impact. The proposed Project would result in less than significant direct and cumulative impacts to CMP facilities.

Threshold 3: No Impact. There is no potential for the Project to change air traffic levels or create substantial air traffic safety risks.

Threshold 4: Less than Significant Impact. No significant transportation safety hazards would be introduced as a result of the proposed Project's design.

Threshold 5: Less than Significant Impact. Adequate emergency access would be provided to the Project site during both near-term construction and long-term operation.

Threshold 6: Less than Significant Impact. The proposed Project is consistent with adopted policies and programs regarding public transit, bicycle, and pedestrian facilities. The Project is designed to reduce all potential transportation mode conflicts. Potential impacts to the performance or safety of transit, bicycle, and pedestrian systems would be less than significant.

4.4.7 MITIGATION MEASURES

The Project Applicant is required to pay TUMF fees (see MM 4.4-4); however, currently programed TUMF improvements will not relieve LOS deficiencies at two (2) study area intersections. The North Perris Road and Bridge Benefit District (RBBD) identifies improvements to Harley Knox Boulevard and the two cumulatively impacted intersections of Harley Knox Boulevard with Western Way and with Indian Avenue. However, because the Project site is not located in the City of Perris and not located in the North Perris RBBD fee area, the Project Applicant is not required to monetarily contribute to the expense of these planned improvements. The following measure is recommended should another funding program be established for these cumulatively impacted intersections by the City of Perris to which projects in other jurisdictions can legally contribute.

MM 4.4-1 In the event that the City of Perris establishes a fair-share funding program for improvements to the following intersections (or immediately adjacent roadways segments that contribute to the intersection's level of service), that applies to projects in the City of Moreno Valley, then prior to the issuance of a building permit for the project, the Project Applicant shall contribute a fair-share payment to the established funding program to address the Project's cumulative impacts to the following facilities:

a) Intersection of Western Way/ Harley Knox Boulevard (Project's fair-share contribution is 3.3%);

b) Intersection of Indian Street/ Harley Knox Boulevard (Project's fair-share contribution is 3.5%)

MM 4.4-2 Prior to the issuance of occupancy permits, the Project shall construct roadway improvements (including but not limited to parkway, landscaping, and sidewalk improvements) along its frontage with Perris Boulevard and San Michele Road as specified in the City of Moreno Valley's Conditions of Approval for Plot Plan PA12-0023.

MM 4.4-3 Prior to the issuance of occupancy permits, the Project shall construct intersection improvements at each Project Driveway as specified in the City of Moreno Valley's Conditions of Approval for Plot Plan PA12-0023.

MM 4.4-4 Prior to the issuance of building or occupancy permits, the Project shall comply with the City of Moreno Valley Development Impact Fee (DIF) program, which requires the payment of a fee to the City to reduce traffic congestion by participating in funding the installation of intersection improvements. Prior to the issuance of occupancy permits, the project also shall comply with the Transportation Uniform Mitigation Fee (TUMF) program, which funds off-site regional transportation improvements. The following study area intersection improvements are currently covered under DIF-funding and/or TUMF-funding:

a) I-215 Southbound Ramps/ Harley Knox Boulevard (ID #1): One (1) southbound lane; one (1) westbound lane; and re-striping for one southbound lane and one southbound right turn.

b) I-215 Northbound Ramps/ Harley Knox Boulevard (ID #2): One westbound free right lane, and re-striping for one (1) northbound right turn lane.

c) Patterson Avenue/ Harley Knox Boulevard (ID #4): One (1) eastbound turn lane, and one (1) westbound turn lane.

d) Indian Street/ Nandina Avenue (ID #5): One (1) northbound turn lane; one (1) southbound turn lane; one (1) southbound right turn lane; one (1) eastbound lane; and protected left-turn on eastbound and westbound approaches.

e) Indian Street/ Harley Knox Boulevard (ID #6): Two (2) southbound right turn lanes with overlapping phasing; one (1) eastbound lane; one (1) eastbound turn lane; and remove cross-walk on north leg (westbound approach).

f) Perris Boulevard/ San Michele Road (ID #12): One southbound turn lane.

MM 4.4-5 On-site direction signing and striping shall be installed in conjunction with detailed construction plans for the Project and as approved by the City of Moreno Valley. The on-site signing and striping plans shall be subject to review and approval by the Planning Division, and shall clearly indicate the location of service area docks and public parking areas.

MM 4.4-6 All final grading, landscaping, and street improvement plans shall provide sight distance standards in accordance with City of Moreno Valley and California Department of Transportation (Caltrans) standards, as appropriate.

MM 4.4-7 The minimum number of vehicle and bicycle parking spaces specified by the City of Moreno Valley Municipal Code shall be provided.

MM 4.4-8 A future transit stop shall be provided by the Project on the southbound side of Perris Boulevard as specified in the City of Moreno Valley's Conditions of Approval for Plot Plan PA12-0023.

4.4.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold 1: Significant Cumulative Impact (Near-Term). With required payment of TUMF fees (see MM 4.4-4), the Project's cumulative impacts at two (2) intersections in the City of Perris (Western Way/Harley Knox Boulevard and Indian Street/Harley Knox Boulevard) would be significant and unavoidable because these intersections fall outside of the City of Moreno Valley's jurisdiction and the City of Moreno Valley has no authority to assure that the needed improvements will be in place prior to the Project's Opening Year Cumulative (2017) condition. Although needed improvements are programmed as part of the North Perris RBBD, the proposed Project is not in the RBBD fee area and as such, has no feasible and legal means to monetarily contribute to the improvements unless another fee program is established by the City of Perris to which the Project Applicant can legally contribute. In conclusion, because there is no assurance that these improvements would be in place prior to the Project's Opening Year Cumulative (2017) condition, the Project's cumulative impact to the intersections of Western Way/ Harley Knox Boulevard and Indian Street/Harley Knox Boulevard is concluded to be significant and unavoidable in the near-term, until such time as the identified improvements are funded and in place. If a funding program is established to which the Project Applicant can participate as specified in Mitigation Measure MM 4.4-1, the Project's impact would be mitigated.

Table 4.4-1 Project Trip Generation Summary

Land Use	Quantity	Units[1]	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Parcel 1 (High-Cube Warehouse)	400.130	TSF							
Passenger Cars:			11	6	17	6	12	18	265
Truck Trips:									
2-axle:			*2*	*1*	*3*	*1*	*2*	*4*	*53*
3-axle:			*7*	*4*	*10*	*4*	*7*	*11*	*160*
4+-axle:			*24*	*13*	*37*	*13*	*27*	*41*	*588*
- Net Truck Trips (PCE) [2]			*33*	*18*	*50*	*18*	*37*	*56*	*801*
First Inland Logistics Center II (PCE) [3]			**43**	**23**	**67**	**24**	**50**	**74**	**1,066**

[1] TSF = Thousand Square Feet.

[2] Based on the following Passenger Car Equivalent Factors: 2-axle = 1.5 PCE, 3-axle = 2.0 PCE, 4+-axle = 3.0 PCE. (See Table 1)

[3] TOTAL TRIPS (PCE) = Passenger Cars + Net Truck Trips (PCE).

Source: (Urban Crossroads, 2013), Section 4.2

Table 4.4-2 Roadway Segment Analysis Locations

ID	Roadway Segments	Jurisdiction
1	Harley Knox Boulevard, West of I-215 Freeway	County of Riverside
2	Harley Knox Boulevard, between I-215 SB and NB Ramps	Perris
3	Harley Knox Boulevard, between I-215 NB Ramps and Western Way	Perris
4	Harley Knox Boulevard, East of Western Way	Perris
5	Harley Knox Boulevard, West of Patterson Avenue	Perris
6	Harley Knox Boulevard, East of Patterson Avenue	Perris
7	Harley Knox Boulevard, West of Indian Street	Perris
8	Harley Knox Boulevard, East of Indian Street	Perris
9	Western Way, North of Harley Knox Boulevard	Perris
10	Patterson Avenue, North of Harley Knox Boulevard	Perris
11	Patterson Avenue, South of Harley Knox Boulevard	Perris
12	Indian Street, North of Nandina Avenue	Moreno Valley
13	Indian Street, South of Nandina Avenue	Moreno Valley
14	Indian Street, North of Harley Knox Boulevard	Moreno Valley
15	Indian Street, South of Harley Knox Boulevard	Perris
16	Knox Street, North of Nandina Avenue	Moreno Valley
17	Perris Boulevard, North of San Michele Road	Moreno Valley
18	Perris Boulevard, South of San Michele Road	Moreno Valley
19	Perris Boulevard, North of Nandina Avenue	Moreno Valley
20	Perris Boulevard, South of Nandina Avenue	Moreno Valley
21	San Michele Road, West of Driveway 1	Moreno Valley
22	San Michele Road, between Driveway 1 and Driveway 3	Moreno Valley
23	San Michele Road, between Driveway 3 and Perris Boulevard	Moreno Valley
24	Nandina Avenue, West of Indian Street	Moreno Valley
25	Nandina Avenue, between Indian Street and Knox Street	Moreno Valley
26	Nandina Avenue, between Knox Street and Driveway 2	Moreno Valley
27	Nandina Avenue, between Driveway 2 and Driveway 4	Moreno Valley
28	Nandina Avenue, between Driveway 4 and Perris Boulevard	Moreno Valley

Source: (Urban Crossroads, 2013), Section 1.3.2

Table 4.4-3 Intersection Analysis Locations

ID	Intersection Location	Jurisdiction
1	I-215 Southbound Ramps / Harley Knox Boulevard	Caltrans
2	I-215 Northbound Ramps / Harley Knox Boulevard	Caltrans
3	Western Way / Harley Knox Boulevard	Perris
4	Patterson Avenue / Harley Knox Boulevard	Perris
5	Indian Street / Nandina Avenue	Moreno Valley
6	Indian Street / Harley Knox Boulevard	Perris
7	Knox Street / Nandina Avenue	Moreno Valley
8	*Driveway 1 / San Michele Road – Future Intersection*	*Moreno Valley*
9	*Driveway 2 / Nandina Avenue – Future Intersection*	*Moreno Valley*
10	*Driveway 3 / San Michele Road – Future Intersection*	*Moreno Valley*
11	*Driveway 4 / Nandina Avenue – Future Intersection*	*Moreno Valley*
12	Perris Boulevard / San Michele Road	Moreno Valley
13	Perris Boulevard / Nandina Avenue	Moreno Valley

Source: (Urban Crossroads, 2013), Section 1.3.1

Table 4.4-4 Freeway Mainline Segments

ID	Freeway Mainline Segments
1	I-215 Freeway – Southbound, north of Harley Knox Boulevard
2	I-215 Freeway – Southbound, south of Harley Knox Boulevard
3	I-215 Freeway – Northbound, north of Harley Knox Boulevard
4	I-215 Freeway – Northbound, south of Harley Knox Boulevard

Source: (Urban Crossroads, 2013). 2012, Section 1.3.3

Table 4.4-5 Freeway Merge/Diverge Ramp Junctions

ID	Freeway Merge/Diverge Ramp Junctions
1	I-215 Freeway – Southbound, Off-Ramp at Harley Knox Boulevard (Diverge)
2	I-215 Freeway – Southbound, On-Ramp at Harley Knox Boulevard (Merge)
3	I-215 Freeway – Northbound, On-Ramp at Harley Knox Boulevard (Merge)
4	I-215 Freeway – Northbound, Off-Ramp at Harley Knox Boulevard (Diverge)

Source: (Urban Crossroads, 2013), Section 1.3.4

Table 4.4-6 Existing (2012) Conditions Roadway Volume/Capacity Analysis

#	Roadway	Segment Limits	Jurisdiction	Roadway Section	LOS Capacity[2,3]	Existing (2012)	V/C	LOS	Acceptable LOS
1	Harley Knox Boulevard	West of I-215 Freeway	Co. of Riv.	4D	35,900	7,884	0.22	A	D
2		I-215 SB Ramps to I-215 NB Ramps	Perris	4D	35,900	10,824	0.30	A	D
3		I-215 NB Ramps to Western Way	Perris	4U	25,900	14,844	0.57	A	D
4		East of Western Way	Perris	4U	25,900	14,052	0.54	A	D
5		West of Patterson Avenue	Perris	4U	25,900	13,992	0.54	A	D
6		East of Patterson Avenue	Perris	2D	18,000	13,152	0.73	C	D
7		West of Indian Street	Perris	4D	35,900	11,592	0.32	A	D
8		East of Indian Street	Perris	4D	35,900	5,856	0.16	A	D
9	Western Way	North of Harley Knox Boulevard	Perris	2U	13,000	1,200	0.09	A	D
10	Patterson Avenue	North of Harley Knox Boulevard	Perris	2U	13,000	132	0.01	A	D
11		South of Harley Knox Boulevard	Perris	2U	13,000	1,236	0.10	A	D
12	Indian Street	North of Nandina Avenue	MV	2D	12,500	3,672	0.29	A	D
13		South of Nandina Avenue	MV	4D	37,500	6,168	0.16	A	D
14		North of Harley Knox Boulevard	MV	4D	37,500	7,572	0.20	A	D
15		South of Harley Knox Boulevard	Perris	4D	35,900	1,428	0.04	A	D
16	Knox Street	North of Nandina Avenue	MV	2D	12,500	324	0.03	A	D
17	Perris Boulevard	North of San Michele Road	MV	3D	25,000	18,960	0.76	C	D
18		South of San Michele Road	MV	4D	37,500	16,932	0.45	A	D
19		North of Nandina Avenue	MV	4D	37,500	19,962	0.53	A	D
20		South of Nandina Avenue	MV	4D	37,500	19,956	0.53	A	D
21	San Michele Road	West of Driveway 1	MV	2D	12,500	3,444	0.28	A	D
22		Driveway 1 to Driveway 3	MV	2D	12,500	3,444	0.28	A	D
23		Driveway 3 to Perris Boulevard	MV	2D	12,500	3,444	0.28	A	D
24	Nandina Avenue	West of Indian Street	MV	2U	12,500	1,236	0.10	A	D
25		Indian Street to Knox Street	MV	2D	12,500	2,340	0.19	A	D
26		Knox Street to Driveway 2	MV	2D	12,500	1,608	0.13	A	D
27		Driveway 2 to Driveway 4	MV	2U	12,500	1,068	0.09	A	D
28		Driveway 4 to Perris Boulevard	MV	2U	12,500	1,068	0.09	A	D

[1] Per Figure 9-2: City of Moreno Valley Level of Service (LOS) Standards, City of Moreno Valley General Plan Circulation Element.
From Table CE-2 of the City of Perris General Plan Circulation Element.

[2] These maximum roadway capacities have been extracted from the City of Moreno Valley's Transportation Division's Traffic Impact Analysis Transportation Division's Traffic Impact Analysis Preparation Guidelines (August 2007). These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic.

[3] The City of Perris roadway standard capacity is LOS "D", with the exception of SR-74 and Cajalco/Ramona Expressway which allows LOS "E" capacity. As such, the volumes shown in the table are based upon LOS "D" capacity with the exception of segments along SR-74 and Cajalco/Ramona Expressway which have been based upon LOS "E" capacity.

Source: (Urban Crossroads, 2013). 2012, Section 3.11

Table 4.4-7 Unsignalized Intersection LOS Thresholds

Level of Service	Description	Average Control Per Vehicle (Seconds)
A	Little or no delays.	0 to 10.00
B	Short traffic delays.	10.01 to 15.00
C	Average traffic delays.	15.01 to 25.00
D	Long traffic delays.	25.01 to 35.00
E	Very long traffic delays.	35.01 to 50.00
F	Extreme traffic delays with intersection capacity exceeded.	> 50.00

Source: (Urban Crossroads, 2013), Section 2.2.2

Table 4.4-8 Intersection Analysis for Existing (2012) Conditions

#	Intersection	Jurisdiction	Traffic Control[3]	Intersection Approach Lanes[1]												Delay[2] (secs.)		Level of Service	
				Northbound			Southbound			Eastbound			Westbound						
				L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
1	I-215 SB Ramps / Harley Knox Bl.	Caltrans	TS	0	0	0	0	1	1	0	2	d	1	2	0	23.7	26.8	C	C
2	I-215 NB Ramps / Harley Knox Bl.	Caltrans	TS	0	1	1	0	0	0	1	2	0	0	2	d	17.7	18.1	B	B
3	Western Wy. / Harley Knox Bl.	Perris	CSS	0	0	0	0	1	0	0	2	0	0	2	0	11.7	13.0	B	B
4	Patterson Av. / Harley Knox Bl.	Perris	TS	0	1	0	0	1	0	1	1	1	1	1	0	17.9	17.6	B	B
5	Indian St. / Nandina Av.[4]	MV	AWS	1	1	d	1	1	0	0	1	0	1	1	1	9.5	10.6	A	B
6	Indian St. / Harley Knox Bl.	Perris	TS	2	2	1	1	2	0>	1	1	1	2	2	0	30.8	29.3	C	C
7	Knox St. / Nandina Av.	MV	CSS	0	0	0	1	0	1	1	1	0	0	1	0	9.1	9.3	A	A
8	Driveway 1 / San Michele Rd.	MV		Future Intersection															
9	Driveway 2 / Nandina Av.	MV		Future Intersection															
10	Driveway 3 / San Michele Rd.	MV		Future Intersection															
11	Driveway 4 / Nandina Av.	MV		Future Intersection															
12	Perris Bl. / San Michele Rd.	MV	TS	1	2	1	1	1	1>	1	1	0	1	1	1	36.0	36.8	D	D
13	Perris Bl. / Nandina Av.	MV	TS	1	3	0	1	1	0	1	2	0	1	1	1	41.7	50.6	D	D

1 When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; d= Defacto Right Turn Lane

2 Per the 2000 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

3 CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal

4 It should be noted that although signal heads are installed, field review indicates that the signal heads are currently flashing red. As such, this intersection was analyzed assuming an all-way stop control operation for existing conditions only. Future analysis scenarios assume the traffic signal is operational.

Source: (Urban Crossroads, 2013), Section 3.7

Table 4.4-9 I-215 Freeway Ramp Junction Merge/Diverge Analysis For Existing (2012) Baseline Conditions

Freeway	Diriection	Ramp or Segment	Lanes on Freeway	AM Peak Hour		PM Peak Hour	
				Density[1]	LOS	Density[1]	LOS
I-215 Freeway	SB	Off-Ramp at Harley Knox Boulevard	3	19.2	B	25.9	C
		On-Ramp at Harley Knox Boulevard	3	16.7	B	23.2	C
	NB	On-Ramp at Harley Knox Boulevard	3	24.1	C	19.2	B
		Off-Ramp at Harley Knox Boulevard	3	24.9	C	18.7	B

1 Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2013), Section 3.11

Table 4.4-10 Existing (2012) Baseline Conditions Basic Freeway Segment Analysis

Scenario	Direction	Mainline Segment	Volume		Truck %	Truck %	Lanes[1]	Density[2]		LOS	
			AM	PM	AM	PM		AM	PM	AM	PM
Existing (2012)	SB	North of Harley Knox Boulevard	2,578	3,837	3%	4%	3	14.1	21.1	B	C
		South of Harley Knox Boulevard	2,526	3,874	4%	4%	3	13.9	21.3	B	C
	NB	North of Harley Knox Boulevard	3,978	2,945	4%	4%	3	21.9	16.2	C	B
		South of Harley Knox Boulevard	3,766	2,633	4%	4%	3	20.7	14.5	C	B

[1] Number of lanes are in the specified direction and is based on existing conditions.
[2] Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2013), Section 3.11

Table 4.4-11 Moreno Valley Roadway Segment Capacity LOS Thresholds

Facility Type	Level of Service Capacity[1]				
	A	B	C	D	E
Six Lane Divided Arterial	33,900	39,400	45,000	50,600	56,300
Four Lane Divided Arterial	22,500	26,300	30,000	33,800	37,500
Four Lane Undivided Arterial	15,000	17,500	20,000	22,500	25,000
Two Lane Industrial Collector	7,500	8,800	10,000	11,300	12,500
Two Lane Undivided Residential	N/A	N/A	N/A	N/A	2,000

[1] *These maximum roadway capacities have been extracted from the City of Moreno Valley's Transportation Division's TIA Preparation Guidelines (August 2007). These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective roadway classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic.*

Source: (Urban Crossroads, 2013), Section 2.3

Table 4.4-12 Perris Roadway Segment Capacity LOS Thresholds[1]

Roadway Classification	Number of Lanes	Level of Service Capacity[1]				
		A	B	C	D	E
Collector	2	7,800	9,100	10,400	11,700	13,000
Collector	4	15,540	18,130	20,700	23,300	25,900
Arterial	2	10,800	12,600	14,400	16,200	18,000
Arterial	4	21,540	25,130	28,700	32,300	35,900
Arterial	6	32,340	37,730	43,100	48,500	53,900
Expressway	4	24,540	28,630	32,700	36,800	40,900
Expressway	6	36,780	42,910	49,000	55,200	61,300
Expressway	8	49,020	57,190	65,400	73,500	81,700
Freeway	4	45,900	53,550	61,200	68,900	76,500
Freeway	6	70,500	82,250	94,000	105,800	117,500
Freeway	8	96,300	112,350	128,400	144,500	160,500
Freeway	10	120,360	140,420	160,500	180,500	200,600

[1] Roadway capacities have been extracted from Table CE-2 of the City of Perris General Plan Circulation Element. All capacity thresholds are based on optimum conditions and are intended as guidelines for planning purposes only. Maximum two-way ADT values are based on the 1999 Modified Highway Capacity Manual level of Service Tables. The City of Perris requires Level of Service "D" capacities to be maintained on City roadways with the exception of SR-74 and Cajalco/Ramona Expressway, where the local road standard is Level of Service "E".

Source: (Urban Crossroads, 2013), Section 2.3

Table 4.4-13 Signalized Intersection LOS Thresholds

Level of Service	Description	Average Control Delay (Seconds)
A	Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00
B	Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00
C	Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00
D	Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	35.01 to 55.00
E	Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	55.01 to 80.00
F	Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths	80.01 and up

Source: (Urban Crossroads, 2013), Section 2.1

Table 4.4-14 Freeway Mainline LOS Thresholds

Level of Service	Description	Density Range (pc/mi/ln)[1]
A	Free-flow operations in which vehicles are relatively unimpeded in their ability to maneuver within the traffic stream. Effects of incidents are easily absorbed.	0.0 – 11.0
B	Relative free-flow operations in which vehicle maneuvers within the traffic stream are slightly restricted. Effects of minor incidents are easily absorbed.	11.1 – 18.0
C	Travel is still at relative free-flow speeds, but freedom to maneuver within the traffic stream is noticeably restricted. Minor incidents may be absorbed, but local deterioration in service will be substantial. Queues begin to form behind significant blockages.	18.1 – 26.0
D	Speeds begin to decline slightly and flows and densities begin to increase more quickly. Freedom to maneuver is noticeably limited. Minor incidents can be expected to create queuing as the traffic stream has little space to absorb disruptions.	26.1 – 35.0
E	Operation at capacity. Vehicles are closely spaced with little room to maneuver. Any disruption in the traffic stream can establish a disruption wave that propagates throughout the upstream traffic flow. Any incident can be expected to produce a serious disruption in traffic flow and extensive queuing.	35.1 – 45.0
F	Breakdown in vehicle flow.	>45.0

[1] *pc/mi/ln = passenger cars per mile per lane. Source: HCM 2000, Chapter 23*

Source: (Urban Crossroads, 2013), Section 2.4

Table 4.4-15 Existing Plus Project Conditions Roadway Volume/Capacity Analysis[1]

#	Roadway	Segment Limits	Jurisdiction	Roadway Section	LOS Capacity[2,3]	Existing Plus Project	V/C	LOS	Acceptable LOS
1	Harley Knox Boulevard	West of I-215 Freeway	Co. of Riv.	4D	35,900	7,884	0.22	A	D
2		I-215 SB Ramps to I-215 NB Ramps	Perris	4D	35,900	11,358	0.32	A	D
3		I-215 NB Ramps to Western Way	Perris	4U	25,900	15,751	0.61	B	D
4		East of Western Way	Perris	4U	25,900	14,959	0.58	A	D
5		West of Patterson Avenue	Perris	4U	25,900	14,899	0.58	A	D
6		East of Patterson Avenue	Perris	2D	18,000	14,073	0.78	C	D
7		West of Indian Street	Perris	4D	35,900	12,512	0.35	A	D
8		East of Indian Street	Perris	4D	35,900	5,856	0.16	A	D
9	Western Way	North of Harley Knox Boulevard	Perris	2U	13,000	1,200	0.09	A	D
10	Patterson Avenue	North of Harley Knox Boulevard	Perris	2U	13,000	132	0.01	A	D
11		South of Harley Knox Boulevard	Perris	2U	13,000	1,250	0.10	A	D
12	Indian Street	North of Nandina Avenue	MV	2D	12,500	3,950	0.32	A	D
13		South of Nandina Avenue	MV	4D	37,500	7,141	0.19	A	D
14		North of Harley Knox Boulevard	MV	4D	37,500	8,545	0.23	A	D
15		South of Harley Knox Boulevard	Perris	4D	35,900	1,481	0.04	A	D
16	Knox Street	North of Nandina Avenue	MV	2D	12,500	324	0.03	A	D
17	Perris Boulevard	North of San Michele Road	MV	3D	25,000	19,026	0.76	C	D
18		South of San Michele Road	MV	4D	37,500	16,998	0.45	A	D
19		North of Nandina Avenue	MV	4D	37,500	19,759	0.53	A	D
20		South of Nandina Avenue	MV	4D	37,500	19,984	0.53	A	D
21	San Michele Road	West of Driveway 1	MV	2D	12,500	3,902	0.31	A	D
22		Driveway 1 to Driveway 3	MV	2D	12,500	3,396	0.27	A	D
23		Driveway 3 to Perris Boulevard	MV	2D	12,500	3,496	0.28	A	D
24	Nandina Avenue	West of Indian Street	MV	2U	12,500	1,236	0.10	A	D
25		Indian Street to Knox Street	MV	2D	12,500	3,035	0.24	A	D
26		Knox Street to Driveway 2	MV	2D	12,500	2,303	0.18	A	D
27		Driveway 2 to Driveway 4	MV	2U	12,500	1,072	0.09	A	D
28		Driveway 4 to Perris Boulevard	MV	2U	12,500	1,135	0.09	A	D

[1] Per Figure 9-2: City of Moreno Valley Level of Service (LOS) Standards, City of Moreno Valley General Plan Circulation Element.
From Table CE-2 of the City of Perris General Plan Circulation Element.

[2] These maximum roadway capacities have been extracted from the City of Moreno Valley's Transportation Division's Traffic Impact Analysis Transportation Division's Traffic Impact Analysis Preparation Guidelines (August 2007). These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic.

[3] The City of Perris roadway standard capacity is LOS "D", with the exception of SR-74 and Cajalco/Ramona Expressway which allows LOS "E" capacity. As such, the volumes shown in the table are based upon LOS "D" capacity with the exception of segments along SR-74 and Cajalco/Ramona Expressway which have been based upon LOS "E" capacity.

Source: (Urban Crossroads, 2013), Section 5.2

Table 4.4-16 Intersection Analysis for Existing Plus Project Conditions

#	Intersection	Jurisdiction	Traffic Control[3]	Intersection Approach Lanes[1]												Delay[2] (secs.)		Level of Service	
				Northbound			Southbound			Eastbound			Westbound						
				L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
1	I-215 SB Ramps / Harley Knox Bl.	Caltrans	TS	0	0	0	0	1	1	0	2	d	1	2	0	25.7	28.5	C	C
2	I-215 NB Ramps / Harley Knox Bl.	Caltrans	TS	0	1	1	0	0	0	1	2	0	0	2	d	17.6	18.0	C	B
3	Western Wy. / Harley Knox Bl.	Perris	CSS	0	0	0	0	1	0	0	2	0	0	2	0	11.9	13.5	B	B
4	Patterson Av. / Harley Knox Bl.	Perris	TS	0	1	0	0	1	0	1	1	1	1	1	0	18.2	18.0	B	B
5	Indian St. / Nandina Av.	MV	TS	1	1	d	1	1	1	0	1	0	1	1	1	30.7	28.1	C	C
6	Indian St. / Harley Knox Bl.	Perris	TS	2	2	1	1	2	0>	1	1	1	2	2	0	31.8	29.4	C	C
7	Knox St. / Nandina Av.	MV	CSS	0	0	0	1	0	1	1	1	0	0	1	0	9.4	9.6	A	A
8	Driveway 1 / San Michele Rd.	MV	**CSS**	0	**1**	0	0	0	0	0	**2**	0	**1**	1	0	10.1	10.5	B	B
9	Driveway 2 / Nandina Av.	MV	**CSS**	0	0	0	0	**1**	0	**1**	1	0	0	1	0	8.7	8.8	A	A
10	Driveway 3 / San Michele Rd.	MV	**CSS**	0	**1**	0	0	0	0	0	**2**	0	**1**	1	0	8.6	8.8	A	A
11	Driveway 4 / Nandina Av.	MV	**CSS**	0	0	0	0	**1**	0	**1**	1	0	0	1	0	9.0	8.8	A	A
12	Perris Bl. / San Michele Rd.	MV	TS	1	2	1	1	1	1>	1	1	**1**	1	1	1	36.2	36.9	D	D
13	Perris Bl. / Nandina Av.	MV	TS	1	3	0	1	**2**	1>	1	2	0	1	1	1	29.1	29.1	C	C

1 When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; d= Defacto Right Turn Lane

2 Per the 2000 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

3 CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal

Source: (Urban Crossroads, 2013), Section 5.2

Table 4.4-17 Opening Year (2017) Conditions Roadway Volume/Capacity Analysis[1]

#	Roadway	Segment Limits	Jurisdiction	Roadway Section	LOS Capacity[2,3]	EA (2017)	V/C	LOS	Acceptable LOS	EAP (2017)	V/C	LOS	Acceptable LOS
1	Harley Knox Boulevard	West of I-215 Freeway	Co. of Riv.	4D	35,900	8,705	0.24	A	D	8,705	0.24	A	D
2		I-215 SB Ramps to I-215 NB Ramps	Perris	4D	35,900	11,951	0.33	A	D	12,485	0.35	A	D
3		I-215 NB Ramps to Western Way	Perris	4U	25,900	16,389	0.63	B	D	17,296	0.67	B	D
4		East of Western Way	Perris	4U	25,900	15,515	0.60	A	D	16,422	0.63	B	D
5		West of Patterson Avenue	Perris	4U	25,900	15,448	0.60	A	D	16,355	0.63	B	D
6		East of Patterson Avenue	Perris	2D	18,000	14,521	0.81	D	D	15,442	0.86	D	D
7		West of Indian Street	Perris	4D	35,900	12,799	0.36	A	D	13,719	0.38	A	D
8		East of Indian Street	Perris	4D	35,900	6,466	0.18	A	D	6,466	0.18	A	D
9	Western Way	North of Harley Knox Boulevard	Perris	2U	13,000	1,325	0.10	A	D	1,325	0.10	A	D
10	Patterson Avenue	North of Harley Knox Boulevard	Perris	2U	13,000	146	0.01	A	D	146	0.01	A	D
11		South of Harley Knox Boulevard	Perris	2U	13,000	1,365	0.11	A	D	1,379	0.11	A	D
12	Indian Street	North of Nandina Avenue	MV	2D	12,500	4,054	0.32	A	D	4,332	0.35	A	D
13		South of Nandina Avenue	MV	4D	37,500	6,810	0.18	A	D	7,783	0.21	A	D
14		North of Harley Knox Boulevard	MV	4D	37,500	8,360	0.22	A	D	9,333	0.25	A	D
15		South of Harley Knox Boulevard	Perris	4D	35,900	1,577	0.04	A	D	1,630	0.05	A	D
16	Knox Street	North of Nandina Avenue	MV	2D	12,500	358	0.03	A	D	358	0.03	A	D
17	Perris Boulevard	North of San Michele Road	MV	3D	25,000	20,933	0.84	D	D	20,999	0.84	D	D
18		South of San Michele Road	MV	4D	37,500	18,694	0.50	A	D	18,760	0.50	A	D
19		North of Nandina Avenue	MV	4D	37,500	21,742	0.58	A	D	21,809	0.58	A	D
20		South of Nandina Avenue	MV	4D	37,500	22,033	0.59	A	D	22,061	0.59	A	D
21	San Michele Road	West of Driveway 1	MV	2D	12,500	4,001	0.32	A	D	4,279	0.34	A	D
22		Driveway 1 to Driveway 3	MV	2D	12,500	3,749	0.30	A	D	3,749	0.30	A	D
23		Driveway 3 to Perris Boulevard	MV	2D	12,500	3,802	0.30	A	D	3,854	0.31	A	D
24	Nandina Avenue	West of Indian Street	MV	2U	12,500	1,365	0.11	A	D	1,365	0.11	A	D
25		Indian Street to Knox Street	MV	2D	12,500	2,584	0.21	A	D	3,279	0.26	A	D
26		Knox Street to Driveway 2	MV	2D	12,500	1,775	0.14	A	D	2,470	0.20	A	D
27		Driveway 2 to Driveway 4	MV	2U	12,500	1,153	0.09	A	D	1,181	0.09	A	D
28		Driveway 4 to Perris Boulevard	MV	2U	12,500	1,179	0.09	A	D	1,246	0.10	A	D

[1] Per Figure 9-2: City of Moreno Valley Level of Service (LOS) Standards, City of Moreno Valley General Plan Circulation Element.

From Table CE-2 of the City of Perris General Plan Circulation Element.

[2] These maximum roadway capacities have been extracted from the City of Moreno Valley's Transportation Division's Traffic Impact Analysis Transportation Division's Traffic Impact Analysis Preparation Guidelines (August 2007). These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic.

[3] The City of Perris roadway standard capacity is LOS "D", with the exception of SR-74 and Cajalco/Ramona Expressway which allows LOS "E" capacity. As such, the volumes shown in the table are based upon LOS "D" capacity with the exception of segments along SR-74 and Cajalco/Ramona Expressway which have been based upon LOS "E" capacity.

Source: (Urban Crossroads, 2013), Section 6.7

Table 4.4-18 Intersection Analysis for Opening Year (2017) Conditions

#	Intersection	Jurisdiction	Traffic Control[3]	Existing (2012) Delay[1] (secs.) AM	Existing (2012) Delay[1] (secs.) PM	Existing (2012) Level of Service AM	Existing (2012) Level of Service PM	EA (2017) Delay[1] (secs.) AM	EA (2017) Delay[1] (secs.) PM	EA (2017) Level of Service AM	EA (2017) Level of Service PM	EAP (2017) Delay[1] (secs.) AM	EAP (2017) Delay[1] (secs.) PM	EAP (2017) Level of Service AM	EAP (2017) Level of Service PM
1	I-215 SB Ramps / Harley Knox Bl.	Caltrans	TS	23.7	26.8	C	C	24.9	36.6	C	D	28.5	41.3	C	D
2	I-215 NB Ramps / Harley Knox Bl.	Caltrans	TS	17.7	18.1	B	B	18.2	19.0	B	B	18.0	19.0	B	B
3	Western Wy. / Harley Knox Bl.	Perris	CSS	11.7	13.0	B	B	12.4	14.1	B	B	12.6	14.7	B	B
4	Patterson Av. / Harley Knox Bl.	Perris	TS	17.9	17.6	B	B	18.7	18.4	B	B	19.1	18.9	B	B
5	Indian St. / Nandina Av.	MV	TS	23.3	23.4	C	C	23.5	23.9	C	C	23.9	25.7	C	C
6	Indian St. / Harley Knox Bl.	Perris	TS	30.8	29.3	C	C	31.6	29.9	C	C	33.0	30.1	C	C
7	Knox St. / Nandina Av.	MV	CSS	9.1	9.3	A	A	9.2	9.4	A	A	9.5	9.8	A	A
8	Driveway 1 / San Michele Rd.	MV	**CSS**	Future Intersection				Future Intersection				10.4	10.8	B	B
9	Driveway 2 / Nandina Av.	MV	**CSS**	Future Intersection				Future Intersection				8.7	8.8	A	A
10	Driveway 3 / San Michele Rd.	MV	**CSS**	Future Intersection				Future Intersection				8.7	8.8	A	A
11	Driveway 4 / Nandina Av.	MV	**CSS**	Future Intersection				Future Intersection				9.1	8.9	A	A
12	Perris Bl. / San Michele Rd.	MV	TS	36.0	36.8	D	D	31.6	31.6	C	C	31.7	31.7	C	C
13	Perris Bl. / Nandina Av.	MV	TS	37.1	46.6	D	D	28	28.3	C	C	28.0	28.3	C	C

[1] Per the 2000 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[2] MV = City of Moreno Valley; MJPA = March Joint Powers Authority

[3] CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal

Source: (Urban Crossroads, 2013), Section 6.4

Table 4.4-19 Opening Year Cumulative (2017) Conditions Roadway Volume/Capacity Analysis

#	Roadway	Segment Limits	Jurisdiction	Roadway Section	LOS Capacity[2,3]	EAC (2017)	V/C	LOS	Acceptable LOS	EAPC (2017)	V/C	LOS	Acceptable LOS
1	Harley Knox Boulevard	West of I-215 Freeway	Co. of Riv.	4D	35,900	13,255	0.37	A	D	13,255	0.37	A	D
2		I-215 SB Ramps to I-215 NB Ramps	Perris	4D	35,900	24,732	0.69	B	D	25,266	0.70	B	D
3		I-215 NB Ramps to Western Way	Perris	4U	25,900	***36,174***	***1.40***	***F***	***D***	***37,081***	***1.43***	***F***	***D***
4		East of Western Way	Perris	4U	25,900	***35,300***	***1.36***	***F***	***D***	***36,207***	***1.40***	***F***	***D***
5		West of Patterson Avenue	Perris	4U	25,900	***35,233***	***1.36***	***F***	***D***	***36,140***	***1.40***	***F***	***D***
6		East of Patterson Avenue	Perris	2D	18,000	***34,418***	***1.91***	***F***	***D***	***35,339***	***1.96***	***F***	***D***
7		West of Indian Street	Perris	3D	25,000	***32,697***	***1.31***	***F***	***D***	***33,617***	***1.34***	***F***	***D***
8		East of Indian Street	Perris	3D	25,000	10,811	0.43	A	D	10,811	0.43	A	D
9	Western Way	North of Harley Knox Boulevard	Perris	2U	13,000	1,325	0.10	A	D	1,325	0.10	A	D
10	Patterson Avenue	North of Harley Knox Boulevard	Perris	2U	13,000	154	0.01	A	D	154	0.01	A	D
11		South of Harley Knox Boulevard	Perris	2U	13,000	1,485	0.11	A	D	1,499	0.12	A	D
12	Indian Street	North of Nandina Avenue	MV	4D	37,500	14,862	0.40	A	D	15,140	0.40	A	D
13		South of Nandina Avenue	MV	2D	12,500	***20,893***	***1.67***	***F***	***D***	***21,867***	***1.75***	***F***	***D***
14		North of Harley Knox Boulevard	MV	2D	12,500	***22,312***	***1.78***	***F***	***D***	***23,286***	***1.86***	***F***	***D***
15		South of Harley Knox Boulevard	Perris	4D	35,900	5,278	0.15	A	D	5,332	0.15	A	D
16	Knox Street	North of Nandina Avenue	MV	2D	12,500	834	0.07	A	D	834	0.07	A	D
17	Perris Boulevard	North of San Michele Road	MV	**6D**	56,300	30,121	0.54	A	D	30,187	0.54	A	D
18		South of San Michele Road	MV	**6D**	56,300	26,870	0.48	A	D	26,938	0.48	A	D
19		North of Nandina Avenue	MV	**6D**	56,300	29,920	0.53	A	D	29,986	0.53	A	D
20		South of Nandina Avenue	MV	**6D**	56,300	29,209	0.52	A	D	29,233	0.52	A	D
21	San Michele Road	West of Driveway 1	MV	2D	12,500	5,729	0.46	A	D	6,007	0.48	A	D
22		Driveway 1 to Driveway 3	MV	2D	12,500	5,477	0.44	A	D	5,477	0.44	A	D
23		Driveway 3 to Perris Boulevard	MV	2D	12,500	5,530	0.44	A	D	5,584	0.45	A	D
24	Nandina Avenue	West of Indian Street	MV	2U	12,500	6,224	0.50	A	D	6,224	0.50	A	D
25		Indian Street to Knox Street	MV	2D	12,500	5,600	0.45	A	D	6,296	0.50	A	D
26		Knox Street to Driveway 2	MV	2D	12,500	4,343	0.35	A	D	5,038	0.40	A	D
27		Driveway 2 to Driveway 4	MV	2U	12,500	3,463	0.28	A	D	3,491	0.28	A	D
28		Driveway 4 to Perris Boulevard	MV	2U	12,500	3,489	0.28	A	D	3,555	0.28	A	D

[1] Per Figure 9-2 City of Moreno Valley Level of Service (LOS) Standards, City of Moreno Valley General Plan Circulation Element.

From Table CE-2 of the City of Perris General Plan Circulation Element.

[2] These maximum roadway capacities have been extracted from the City of Moreno Valley's Transportation Division's Traffic Impact Analysis Transportation Division's Traffic Impact Analysis Preparation Guidelines (August 2007). These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic.

[3] The City of Perris roadway standard capacity is LOS "D", with the exception of SR-74 and Cajalco/Ramona Expressway which allows LOS "E" capacity. As such, the volumes shown in the table are based upon LOS "D" capacity with the exception of segments along SR-74 and Cajalco/Ramona Expressway which have been based upon LOS "E" capacity.

Source: (Urban Crossroads, 2013), Section 7.6

Table 4.4-20 Intersection Analysis for Opening Year Cumulative (2017) Conditions

#	Intersection	Jurisdiction	Traffic Control[3]	Existing (2012) Delay[1] (secs.) AM	Existing (2012) Delay[1] (secs.) PM	Existing (2012) Level of Service AM	Existing (2012) Level of Service PM	EAC (2017) Delay[1] (secs.) AM	EAC (2017) Delay[1] (secs.) PM	EAC (2017) Level of Service AM	EAC (2017) Level of Service PM	EAPC (2017) Delay[1] (secs.) AM	EAPC (2017) Delay[1] (secs.) PM	EAPC (2017) Level of Service AM	EAPC (2017) Level of Service PM
1	I-215 SB Ramps / Harley Knox Bl.	Caltrans	TS	23.7	26.8	C	C	***>80.0***	***>80.0***	***F***	***F***	***>80.0***	***>80.0***	***F***	***F***
2	I-215 NB Ramps / Harley Knox Bl.	Caltrans	TS	17.7	18.1	B	B	47.6	***>80.0***	D	***F***	48.4	***>80.0***	D	***F***
3	Western Wy. / Harley Knox Bl.	Perris	CSS	11.7	13.0	B	B	23.2	***>50.0***	C	***F***	24.2	***>50.0***	C	***F***
4	Patterson Av. / Harley Knox Bl.	Perris	TS	17.9	17.6	B	B	***>80.0***	***>80.0***	***F***	***F***	***>80.0***	***>80.0***	***F***	***F***
5	Indian St. / Nandina Av.	MV	TS	23.3	23.4	C	C	28.5	29.5	C	C	28.9	31.2	C	C
6	Indian St. / Harley Knox Bl.	Perris	TS	30.8	29.3	C	C	***>80.0***	***>80.0***	***F***	***F***	***>80.0***	***>80.0***	***F***	***F***
7	Knox St. / Nandina Av.	MV	CSS	9.1	9.3	A	A	11.1	11.5	B	B	11.5	11.9	B	B
8	Driveway 1 / San Michele Rd.	MV	**CSS**	Future Intersection				Future Intersection				11.5	12.2	B	B
9	Driveway 2 / Nandina Av.	MV	**CSS**	Future Intersection				Future Intersection				9.5	9.2	A	A
10	Driveway 3 / San Michele Rd.	MV	**CSS**	Future Intersection				Future Intersection				8.7	9.1	A	A
11	Driveway 4 / Nandina Av.	MV	**CSS**	Future Intersection				Future Intersection				10.4	10.0	B	B
12	Perris Bl. / San Michele Rd.	MV	TS	36.0	36.8	D	D	33.6	38.8	C	D	33.8	38.9	C	D
13	Perris Bl. / Nandina Av.	MV	TS	37.1	46.6	D	D	29.8	33.1	C	C	24.8	33.2	C	C

[1] Per the 2000 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] MV = City of Moreno Valley; MJPA = March Joint Powers Authority
[3] CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal

Source: (Urban Crossroads, 2013), Section 7.5

Table 4.4-21 Existing Plus Project Conditions Basic Freeway Segment Analysis

Scenario	Direction	Mainline Segment	Volume AM	Volume PM	Truck % AM	Truck % PM	Lanes[1]	Density[2] AM	Density[2] PM	LOS AM	LOS PM
Existing + Project	SB	North of Harley Knox Boulevard	2,613	3,856	5%	4%	3	14.5	21.2	B	C
		South of Harley Knox Boulevard	2,531	3,884	4%	4%	3	13.9	21.4	B	C
	NB	North of Harley Knox Boulevard	3,994	2,977	4%	5%	3	22.0	16.5	C	B
		South of Harley Knox Boulevard	3,768	2,634	4%	4%	3	20.8	14.5	C	B

[1] Number of lanes are in the specified direction and is based on existing conditions.
[2] Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2013), Section 5.6

Table 4.4-22 I-215 Freeway Ramp Junction Merge/Diverge Analysis For Existing Plus Project Conditions

Freeway	Direction	Ramp or Segment	Lanes on Freeway	AM Peak Hour Density[1]	AM Peak Hour LOS	PM Peak Hour Density[1]	PM Peak Hour LOS
I-215 Freeway	SB	Off-Ramp at Harley Knox Boulevard	3	19.6	B	26.0	C
		On-Ramp at Harley Knox Boulevard	3	16.7	B	23.3	C
	NB	On-Ramp at Harley Knox Boulevard	3	24.3	C	19.6	B
		Off-Ramp at Harley Knox Boulevard	3	24.9	C	18.7	B

[1] Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2013), Section 5.6

Table 4.4-23 Opening Year (2017) Conditions Basic Freeway Segment Analysis

Scenario	Direction	Mainline Segment	Volume		Truck %	Truck %	Lanes[1]	Density[2]		LOS	
			AM	PM	AM	PM		AM	PM	AM	PM
EA (2017)	SB	North of Harley Knox Boulevard	2,846	4,236	3%	4%	3	15.6	23.3	B	C
		South of Harley Knox Boulevard	2,789	4,277	4%	4%	3	15.4	23.6	B	C
	NB	North of Harley Knox Boulevard	4,392	3,252	4%	4%	3	24.2	17.9	C	B
		South of Harley Knox Boulevard	4,158	2,907	4%	4%	3	22.9	16.0	C	B
EAP (2017)	SB	North of Harley Knox Boulevard	2,881	4,255	4%	4%	3	15.9	23.4	B	C
		South of Harley Knox Boulevard	2,794	4,287	4%	4%	3	15.4	23.6	B	C
	NB	North of Harley Knox Boulevard	4,408	3,284	4%	5%	3	24.3	18.2	C	C
		South of Harley Knox Boulevard	4,160	2,908	4%	4%	3	22.9	16.0	C	B

[1] Number of lanes are in the specified direction and is based on existing conditions.
[2] Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2013), Section 6.9

Table 4.4-24 I-215 Freeway Ramp Junction Merge/Diverge Analysis For Opening Year (2017) Conditions

Freeway	Diriection	Ramp or Segment	Lanes on Freeway	Opening Year (2017) Without Project				Opening Year (2017) With Project			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
				Density[1]	LOS	Density[1]	LOS	Density[1]	LOS	Density[1]	LOS
I-215 Freeway	SB	Off-Ramp at Harley Knox Boulevard	3	20.8	C	27.9	C	21.1	C	28.0	D
		On-Ramp at Harley Knox Boulevard	3	18.0	B	25.2	C	18.0	B	25.3	C
	NB	On-Ramp at Harley Knox Boulevard	3	26.3	C	20.9	C	26.5	C	21.2	C
		Off-Ramp at Harley Knox Boulevard	3	26.9	C	20.2	C	26.9	C	20.2	C

[1] Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2013), Section 6.9

Table 4.4-25 Opening Year Cumulative (2017) Conditions Basic Freeway Segment Analysis

Scenario	Direction	Mainline Segment	Volume		Truck %	Truck %	Lanes[1]	Density[2]		LOS	
			AM	PM	AM	PM		AM	PM	AM	PM
EAC (2017)	SB	North of Harley Knox Boulevard	4,211	5,689	21%	10%	3	25.2	35.2	C	E
		South of Harley Knox Boulevard	3,542	5,958	14%	14%	3	20.5	40.0	C	E
	NB	North of Harley Knox Boulevard	5,735	4,654	9%	18%	3	35.4	27.8	E	D
		South of Harley Knox Boulevard	5,700	3,682	12%	13%	3	35.9	21.2	E	C
EAPC (2017)	SB	North of Harley Knox Boulevard	4,246	5,708	21%	11%	3	25.4	35.7	C	E
		South of Harley Knox Boulevard	3,547	5,968	14%	14%	3	20.5	40.1	C	E
	NB	North of Harley Knox Boulevard	5,751	4,686	9%	19%	3	35.6	28.2	E	D
		South of Harley Knox Boulevard	5,702	3,683	12%	13%	3	35.9	21.2	E	C

[1] Number of lanes are in the specified direction and is based on existing conditions.
[2] Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2013), Section 7.8

Table 4.4-26 I-215 Freeway Ramp Junction Merge/Diverge Analysis For Opening Year Cumulative (2017) Conditions

Freeway	Direction	Ramp or Segment	Lanes on Freeway	OY Cumulative (2017) Without Project				OY Cumulative (2017) With Project			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
				Density[1]	LOS	Density[1]	LOS	Density[1]	LOS	Density[1]	LOS
I-215 Freeway	SB	Off-Ramp at Harley Knox Boulevard	3	31.6	D	35.8	E	31.9	D	36.0	E
		On-Ramp at Harley Knox Boulevard	3	23.3	C	36.6	E	23.3	C	36.7	E
	NB	On-Ramp at Harley Knox Boulevard	3	34.6	D	32.6	D	34.7	D	33.0	D
		Off-Ramp at Harley Knox Boulevard	3	35.7	E	25.6	C	35.7	E	25.7	C

[1] Density is measured by passenger cars per mile per lane (pc/mi/ln).

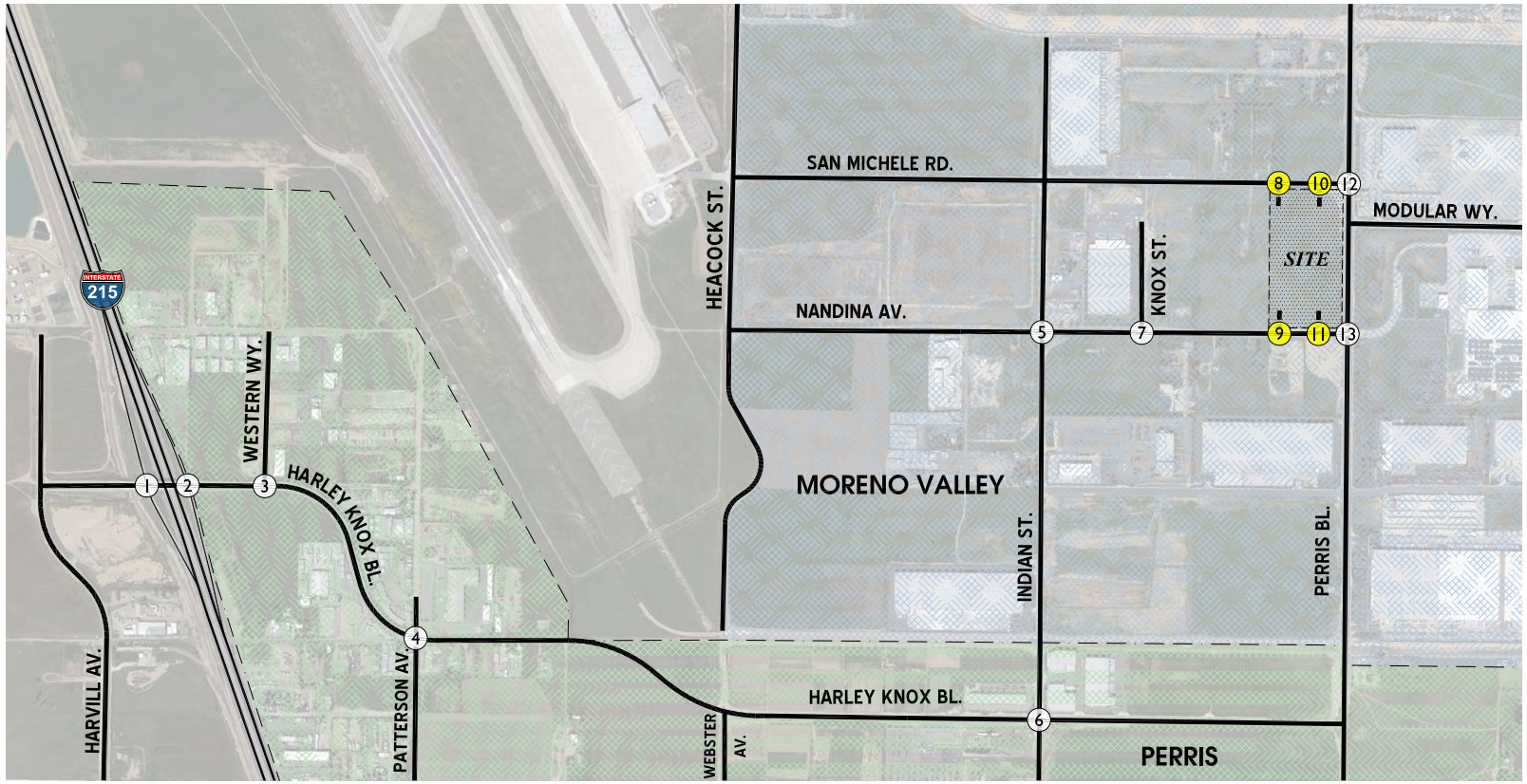
Source: Urban Crossroads, Inc. 2012, Section 7.8

Table 4.4-27 Summary of Transportation Impact Fee Program Improvements for Opening Year Cumulative (2017) Conditions

#	Intersection Location	EAPC (2017) Recommended Improvements	Program Improvements[1]	Non-Program Improvements	Fair Share[2]
1	I-215 SB Ramps / Harley Knox Bl.	1.SBL; 1.WBL; Re-stripe for 1.SBL and 1.SBT/R	1.SBL; 1.WBL; Re-stripe for 1.SBL and 1.SBT/R	None	--
2	I-215 NB Ramps / Harley Knox Bl.	1.WB Free Right; Re-stripe for 1.NBL/T/R	1.WB Free Right; Re-stripe for 1.NBL/T/R	None	--
3	Western Wy. / Harley Knox Bl.	Install Traffic Signal; 1.SBL; 1.EBL	None	Install Traffic Signal; 1.SBL; 1.EBL	3.3%
4	Patterson Av. / Harley Knox Bl.	1.EBT; 1.WBT	1.EBT; 1.WBT	None	--
6	Indian St. / Harley Knox Bl.	2.SBR w/ overlap phasing; 1.EBL; 1.EBT; Remove cross-walk on north leg (WB approach)	1.EBT	2.SBR w/ overlap phasing; 1.EBL; Remove cross-walk on north leg (WB approach)	3.5%

[1] Improvements included in TUMF Nexus (2006) or City of Moreno Valley DIF (2007) programs.
[2] Program improvements constructed by project may be eligible for fee credit. In lieu fee payment is at discretion of City.

Source: Urban Crossroads, Inc. 2012, Section 9.1



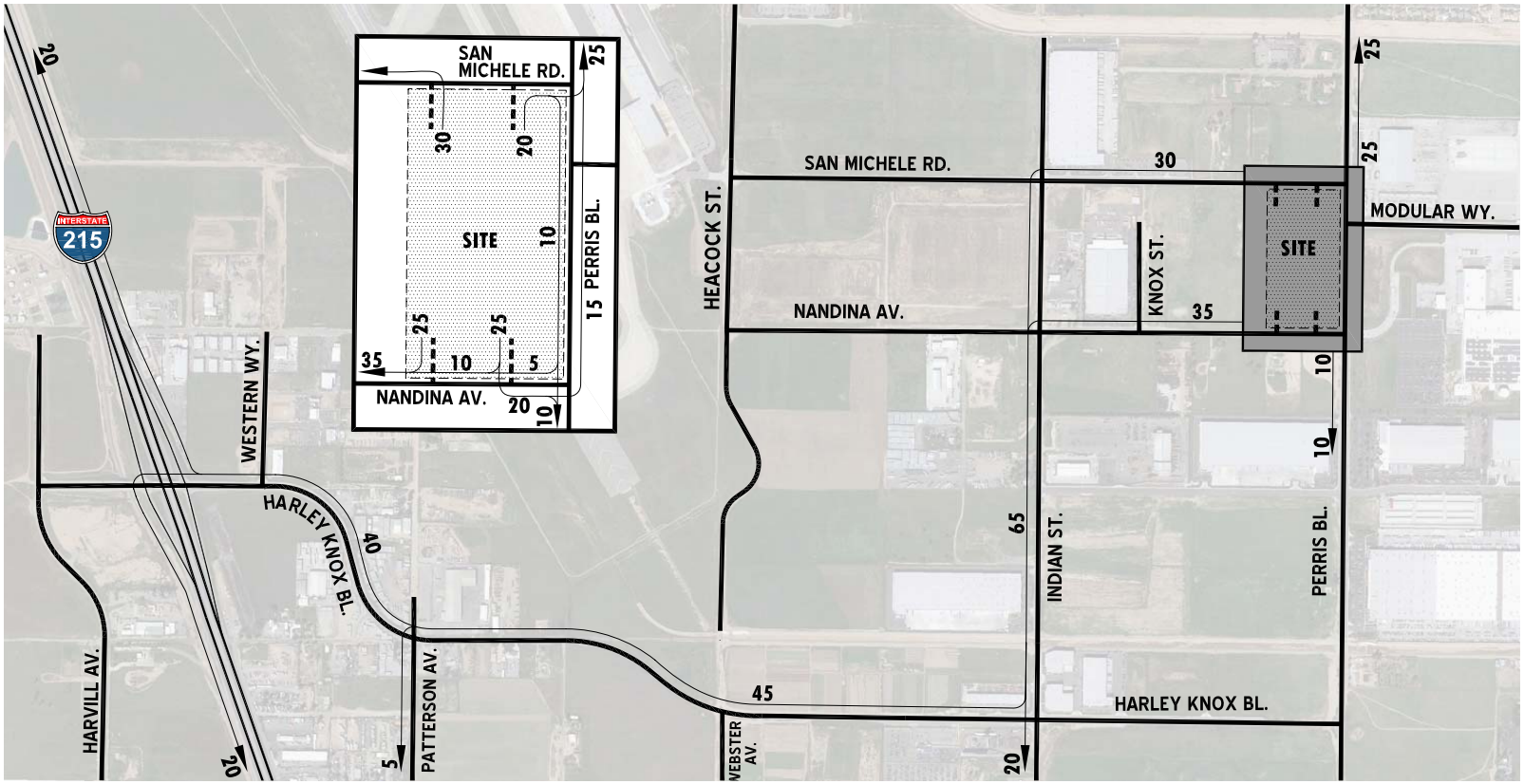
LEGEND:

(1) = EXISTING INTERSECTION ANALYSIS LOCATION

(1) = FUTURE INTERSECTION ANALYSIS LOCATION

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-1
Project Study Area/Intersection Locations

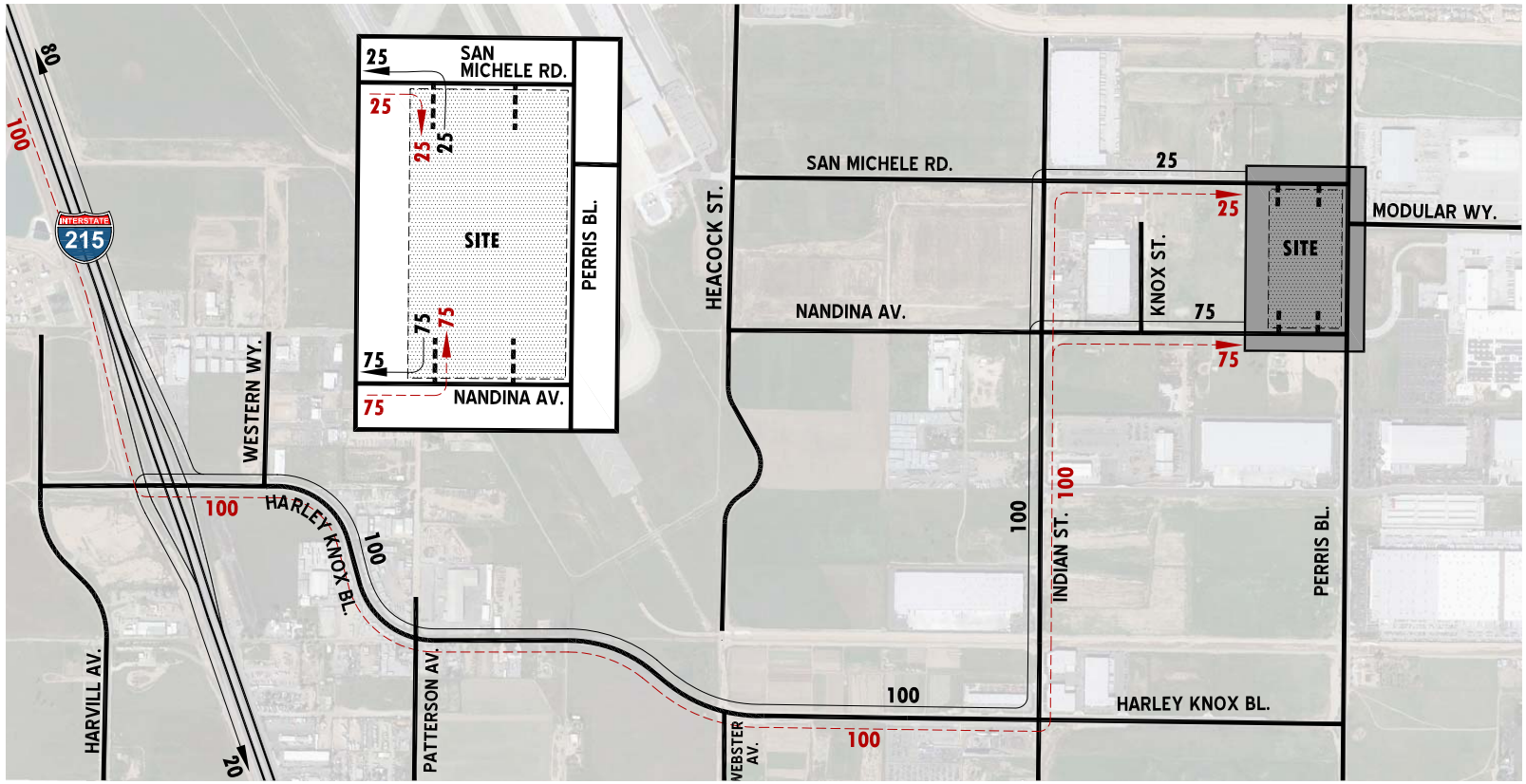


LEGEND:

10 = PERCENT TO/FROM PROJECT

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-2
Project (Passenger Car) Trip Distribution



LEGEND:

10 = PERCENT TO/FROM PROJECT
—— = OUTBOUND
- - - - = INBOUND

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-3
Project (Truck) Trip Distribution

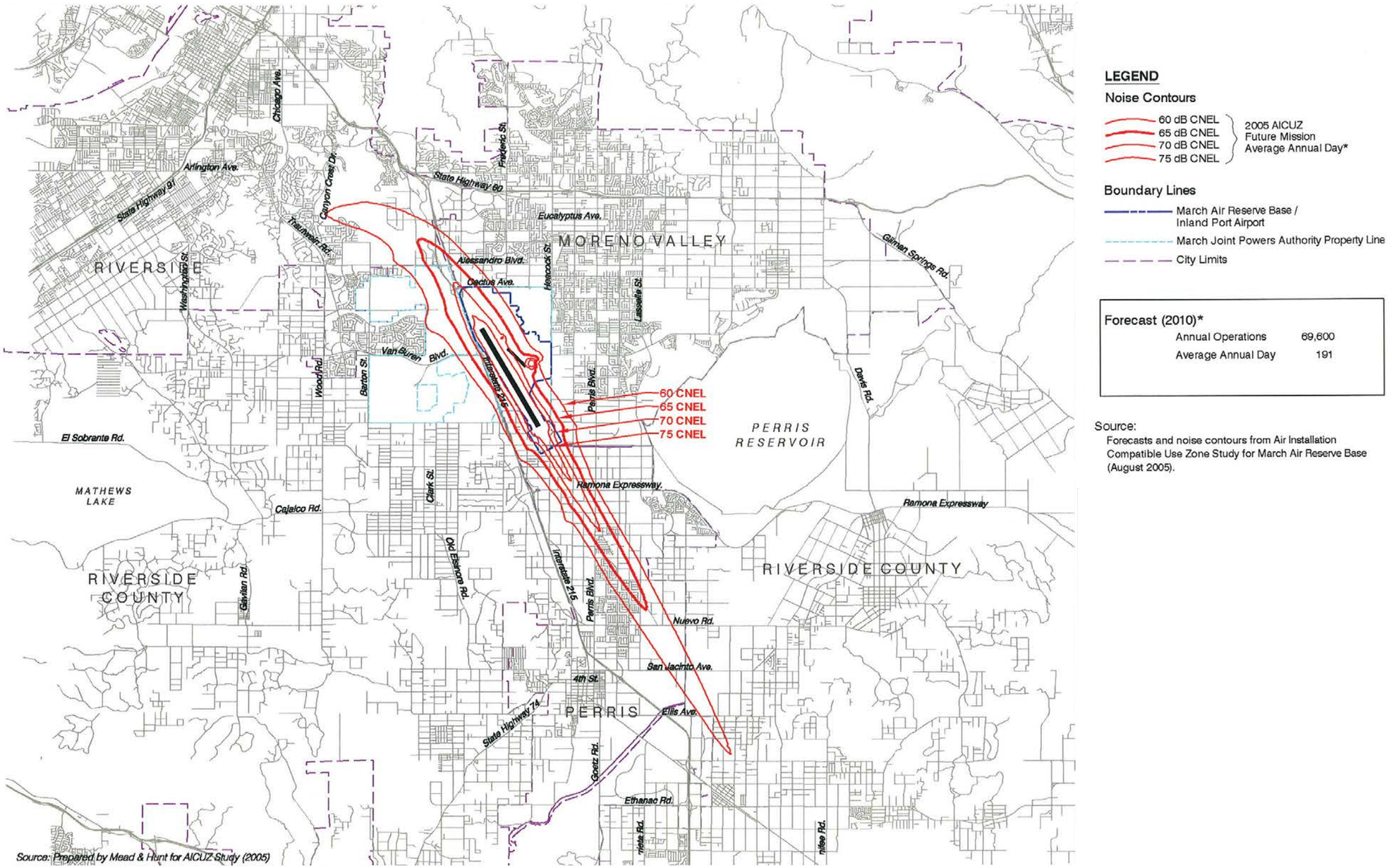
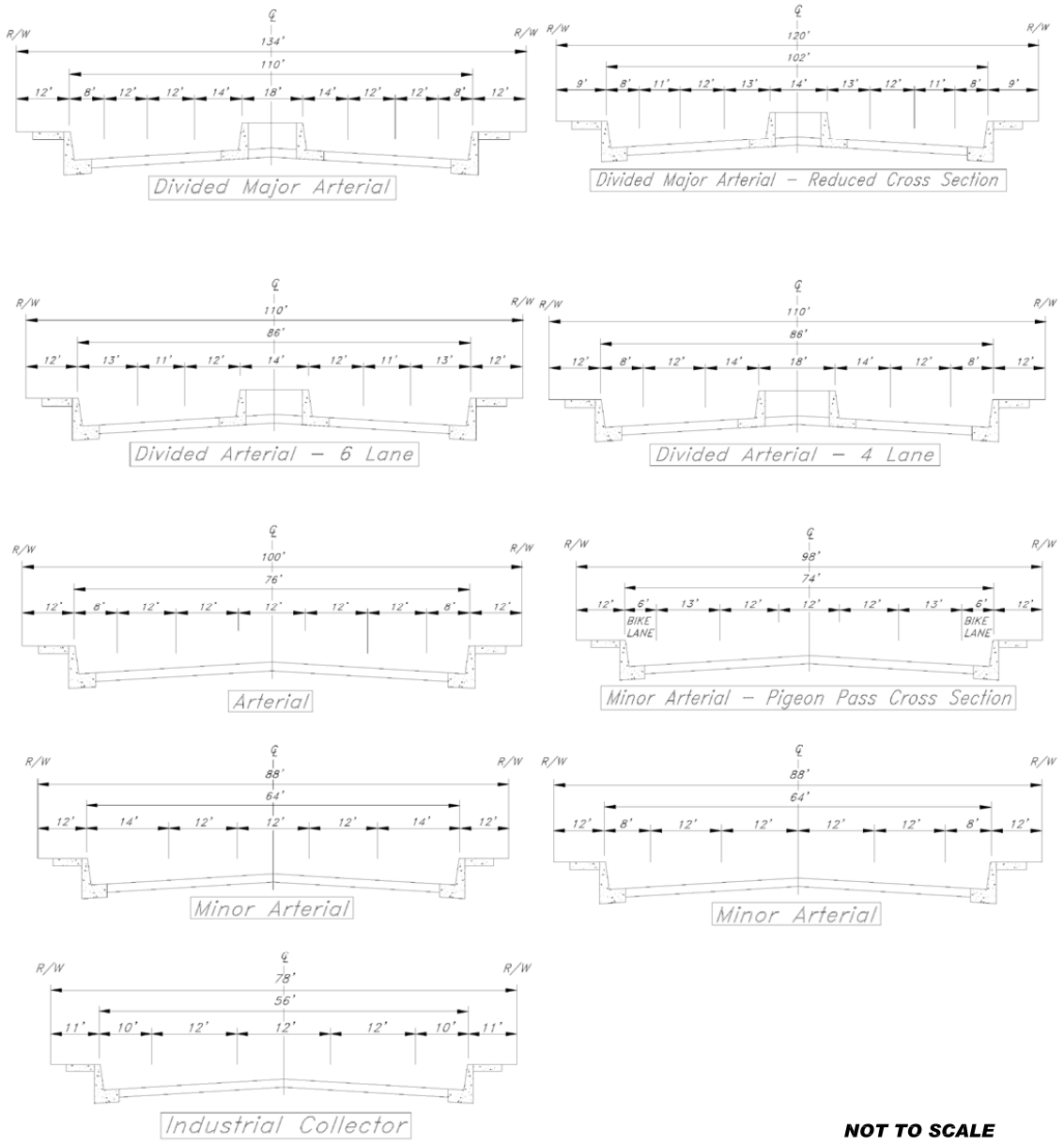


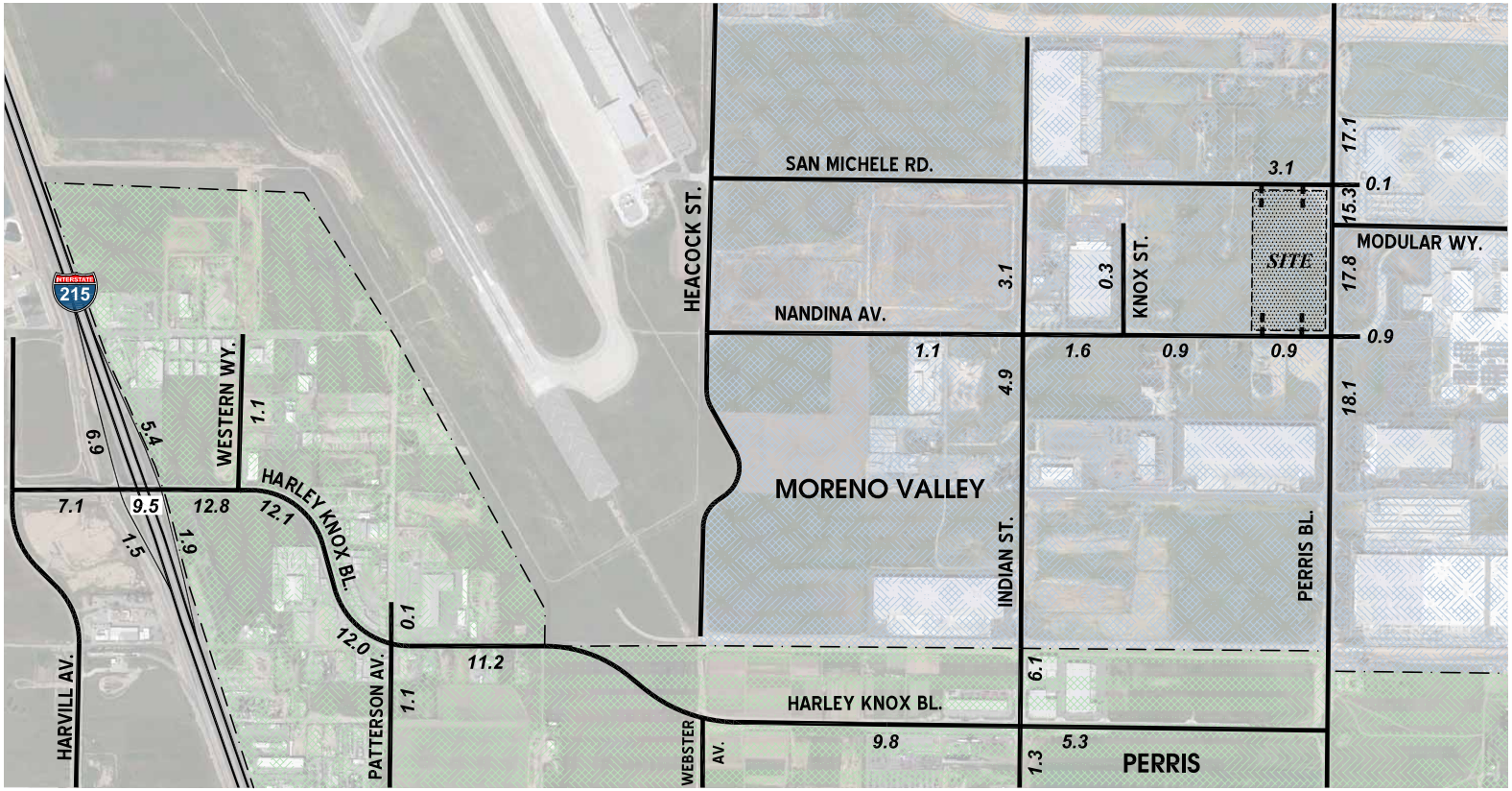
FIGURE 4.3-4
March Reserve Air Base Noise Contours



SOURCE: CITY OF Moreno Valley (July 11, 2006)

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-5
City of Moreno Valley General Plan Roadway Cross-Sections

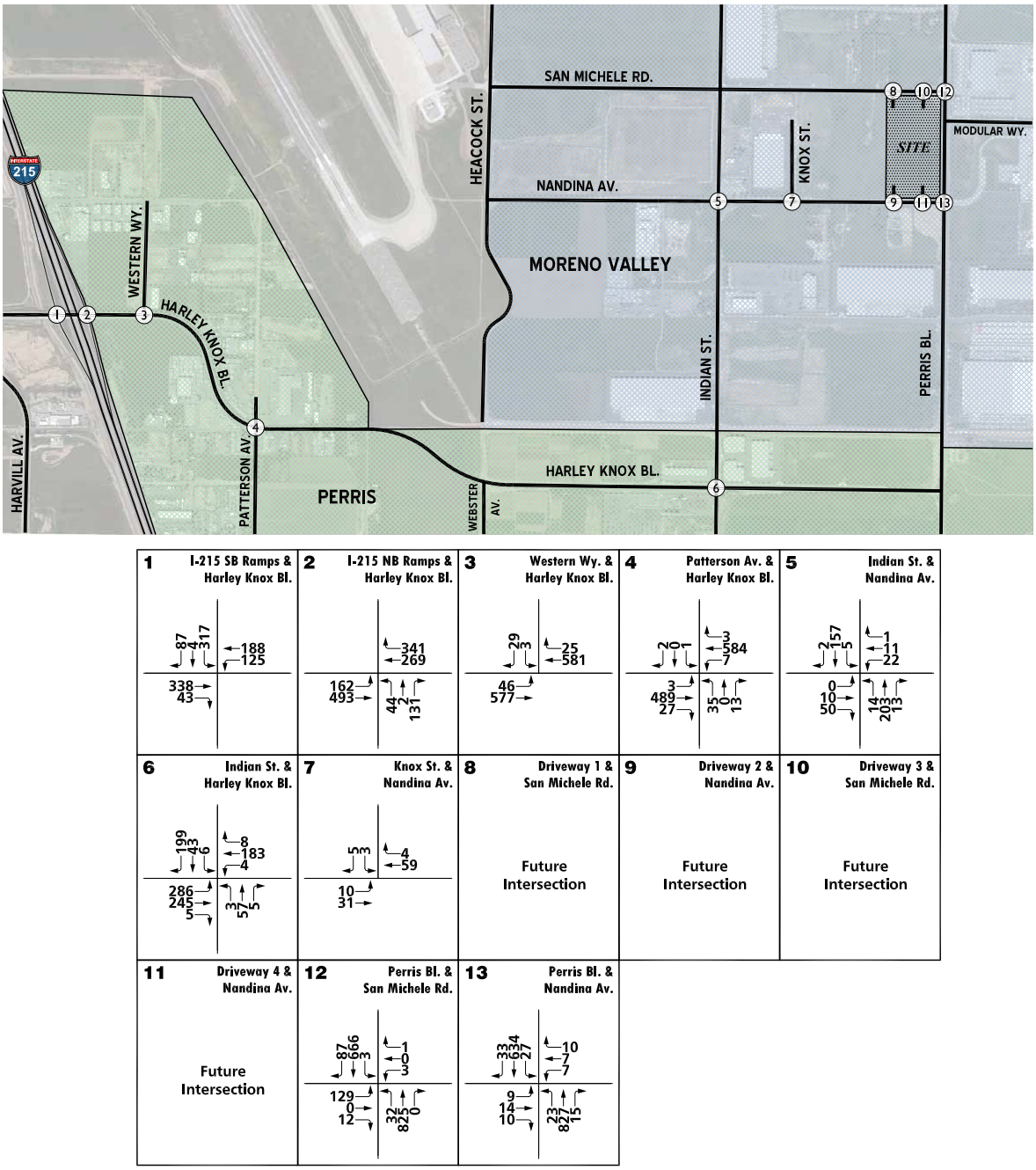


LEGEND:

10.0 = VEHICLES PER DAY (1000'S)

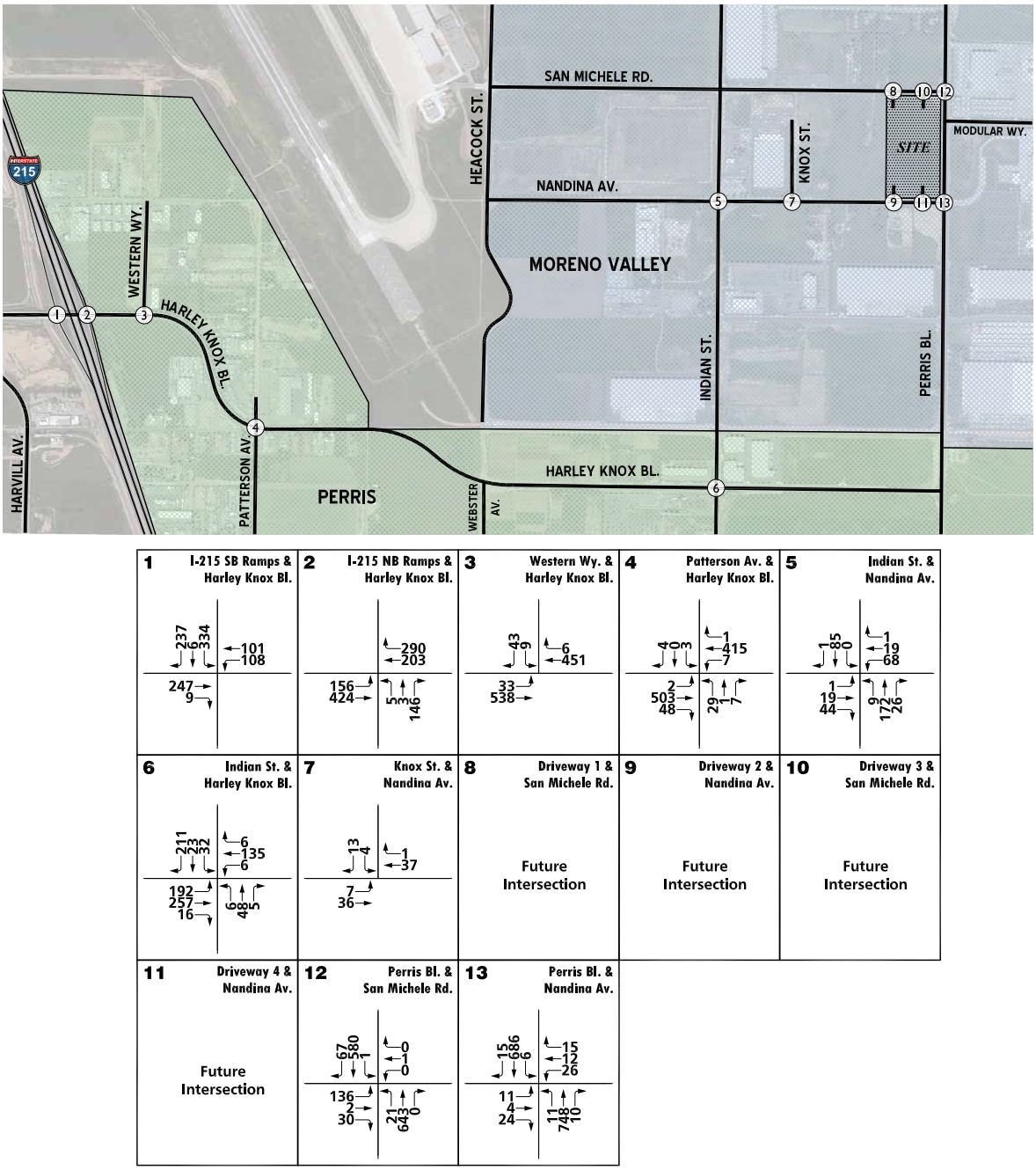
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-6
Existing (2012) Average Daily Traffic (ADT)



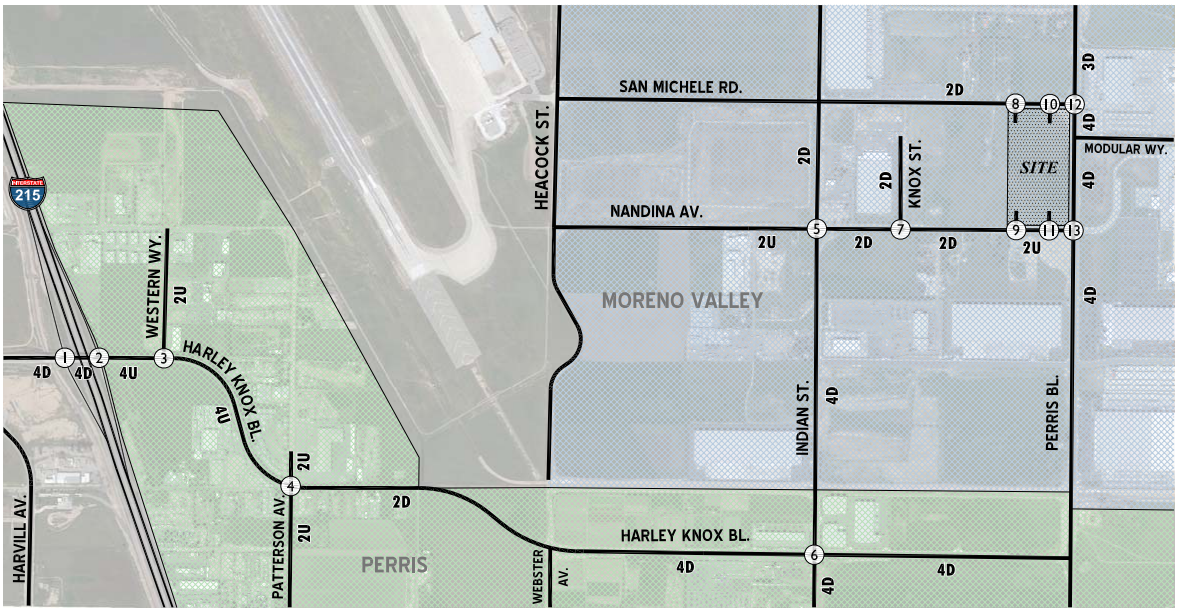
Source: Urban Crossroads (07-06-12)

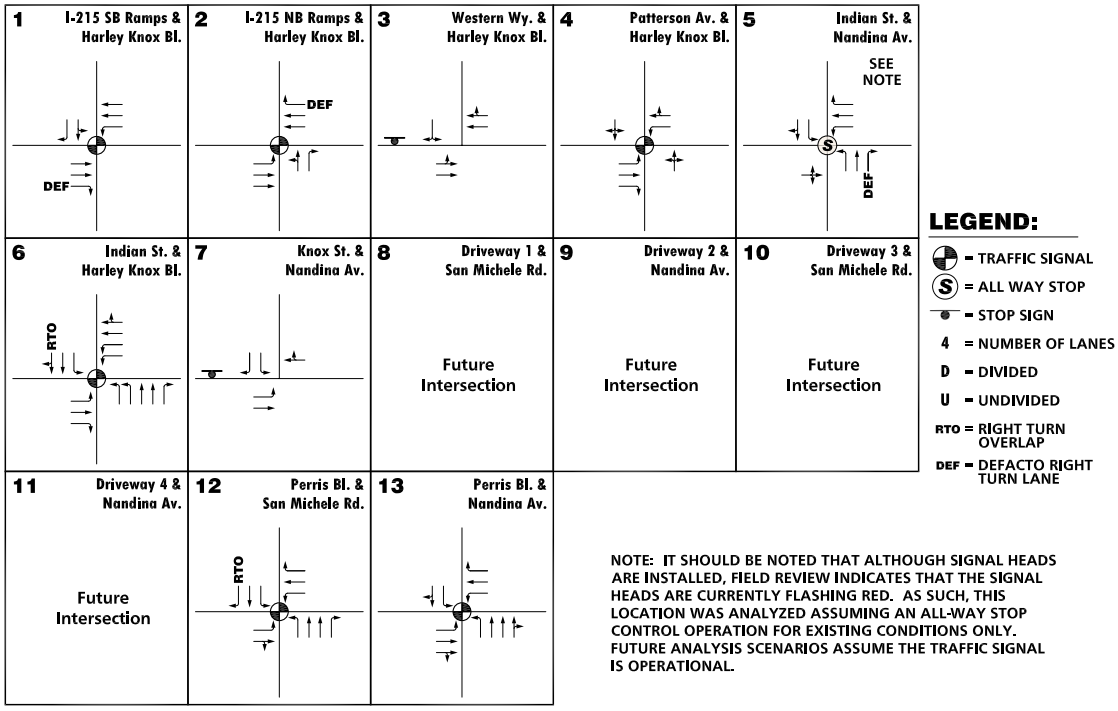
FIGURE 4.4-7
Existing (2012) AM Peak Hour Intersection Volumes



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-8
Existing (2012) PM Peak Hour Intersection Volumes





Source: Urban Crossroads (07-06-12)

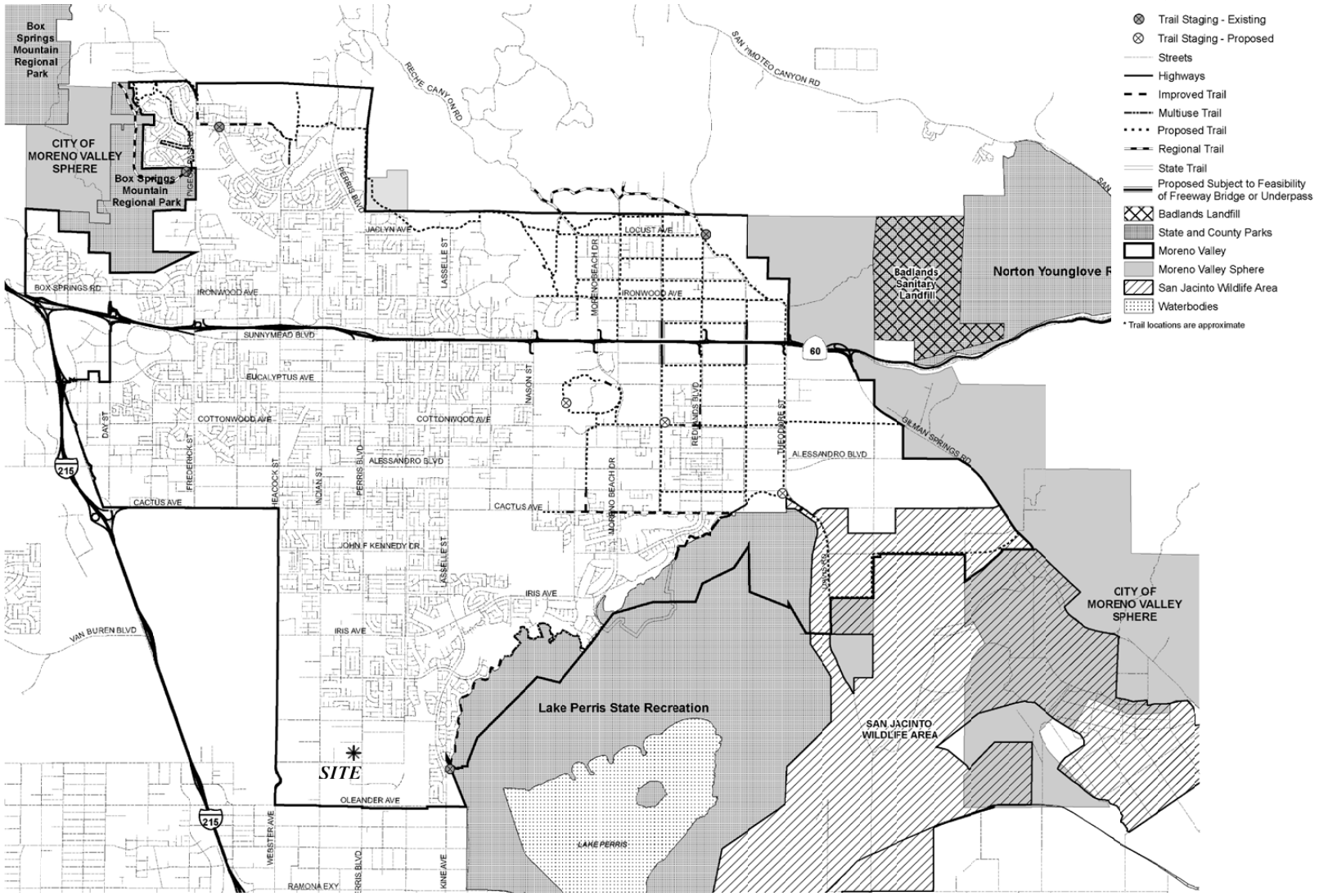
FIGURE 4.4-9
Existing Number of Through Traffic Lanes and Intersection Controls

LEGEND:

100 (250) = AM (PM) PEAK HOUR VOLUMES

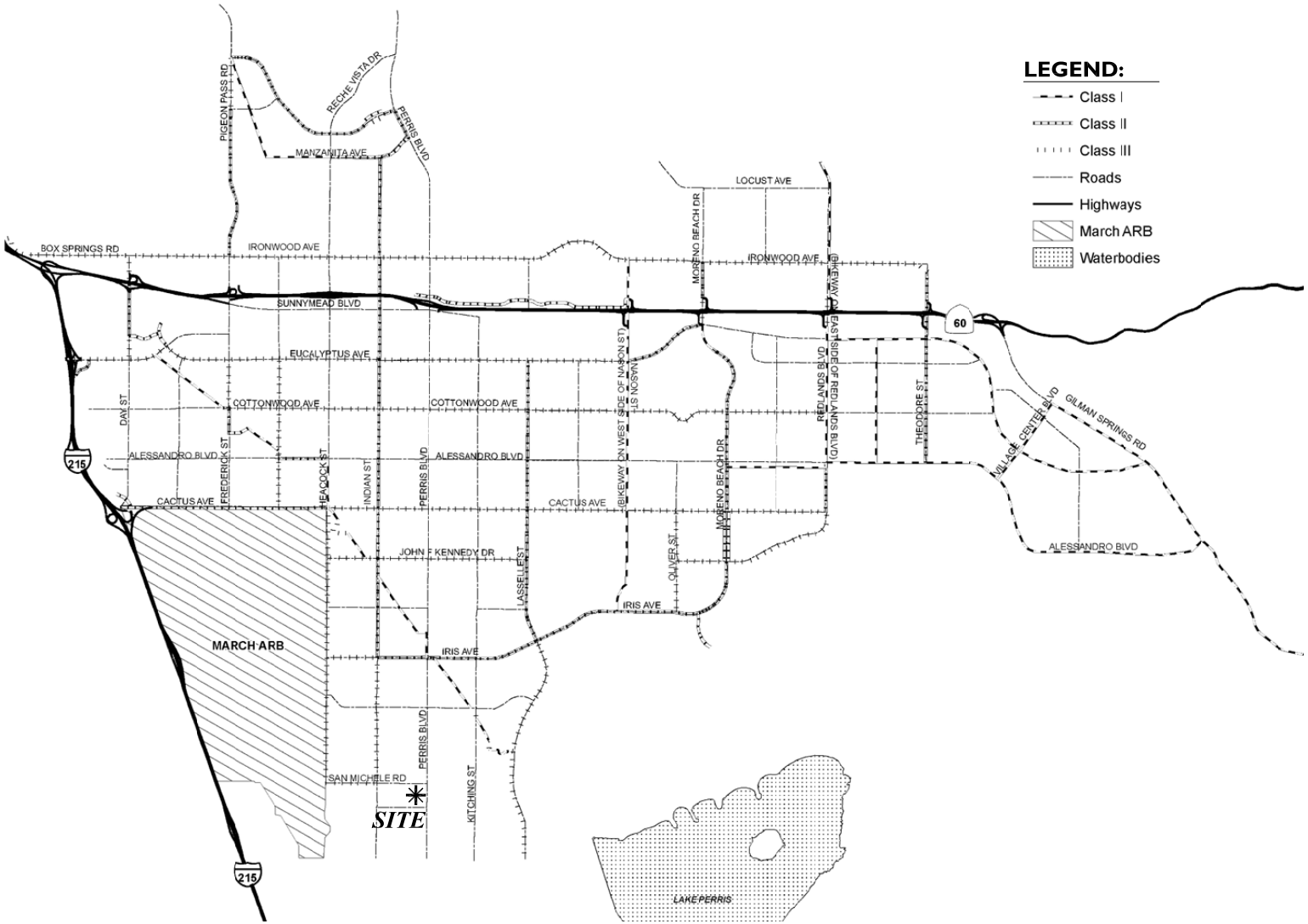
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-10
Existing (2012) Baseline I-215 Freeway Mainline Volumes



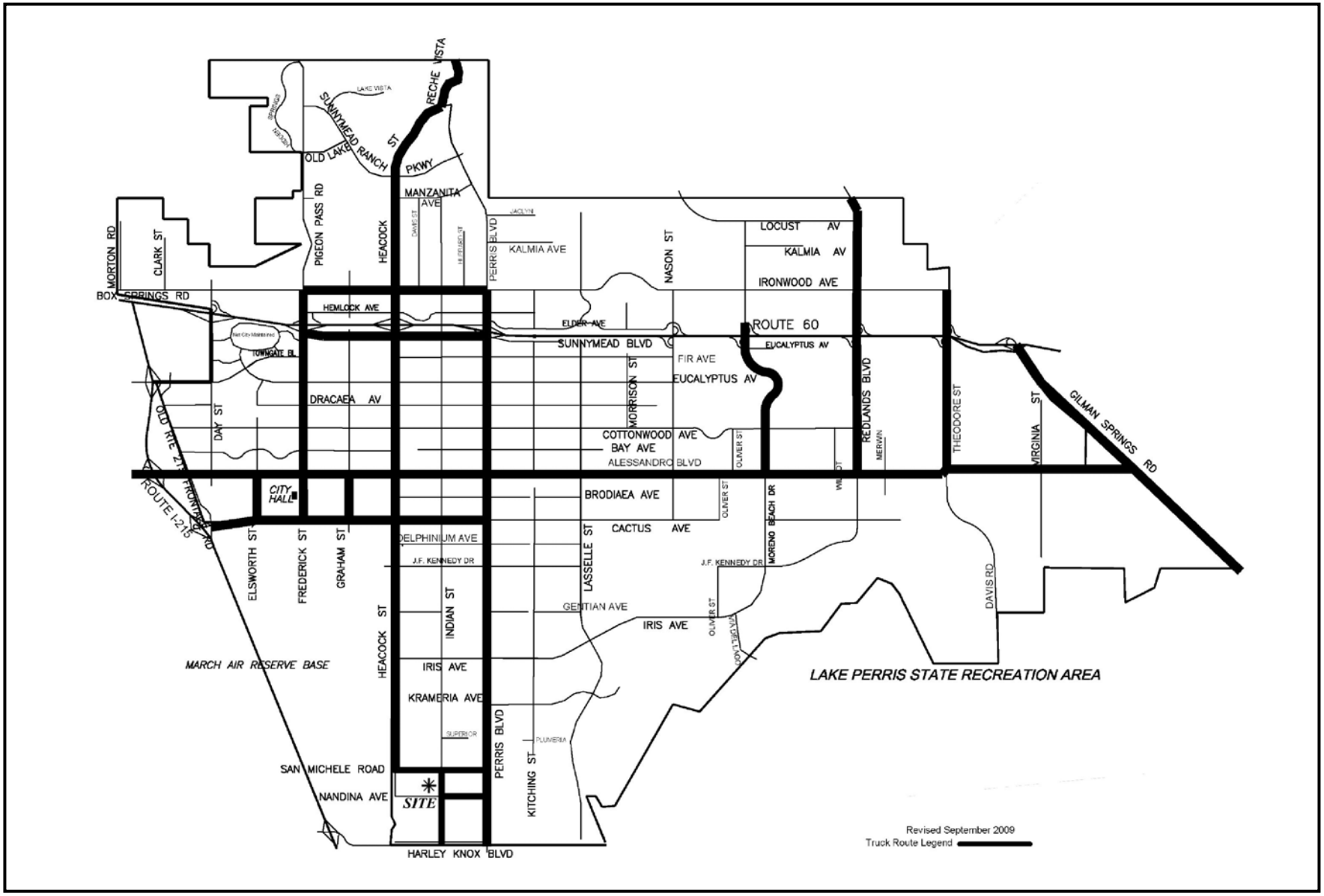
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-11
City of Moreno Valley Master Plan of Trails



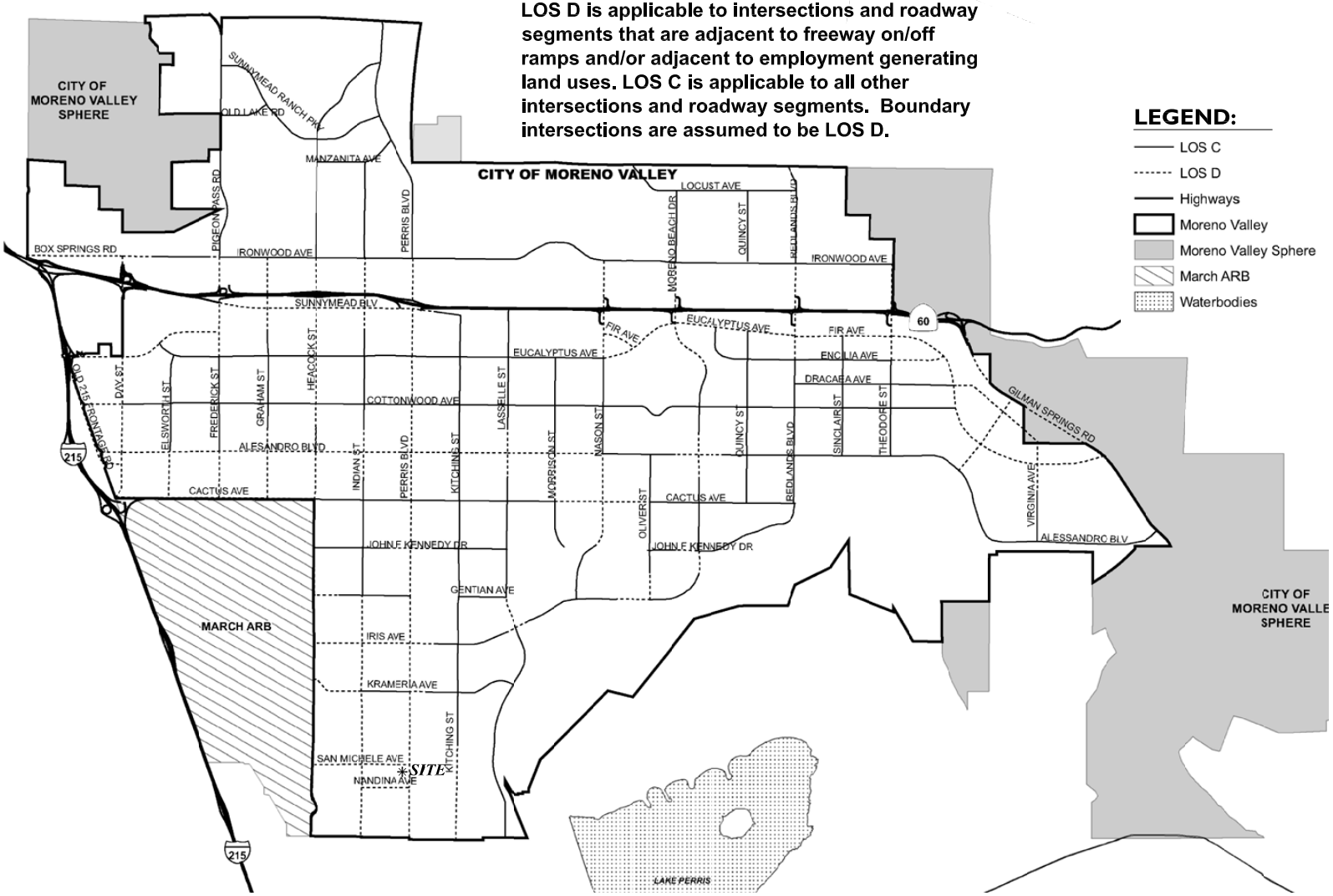
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-12
City of Moreno Valley Bike Plan



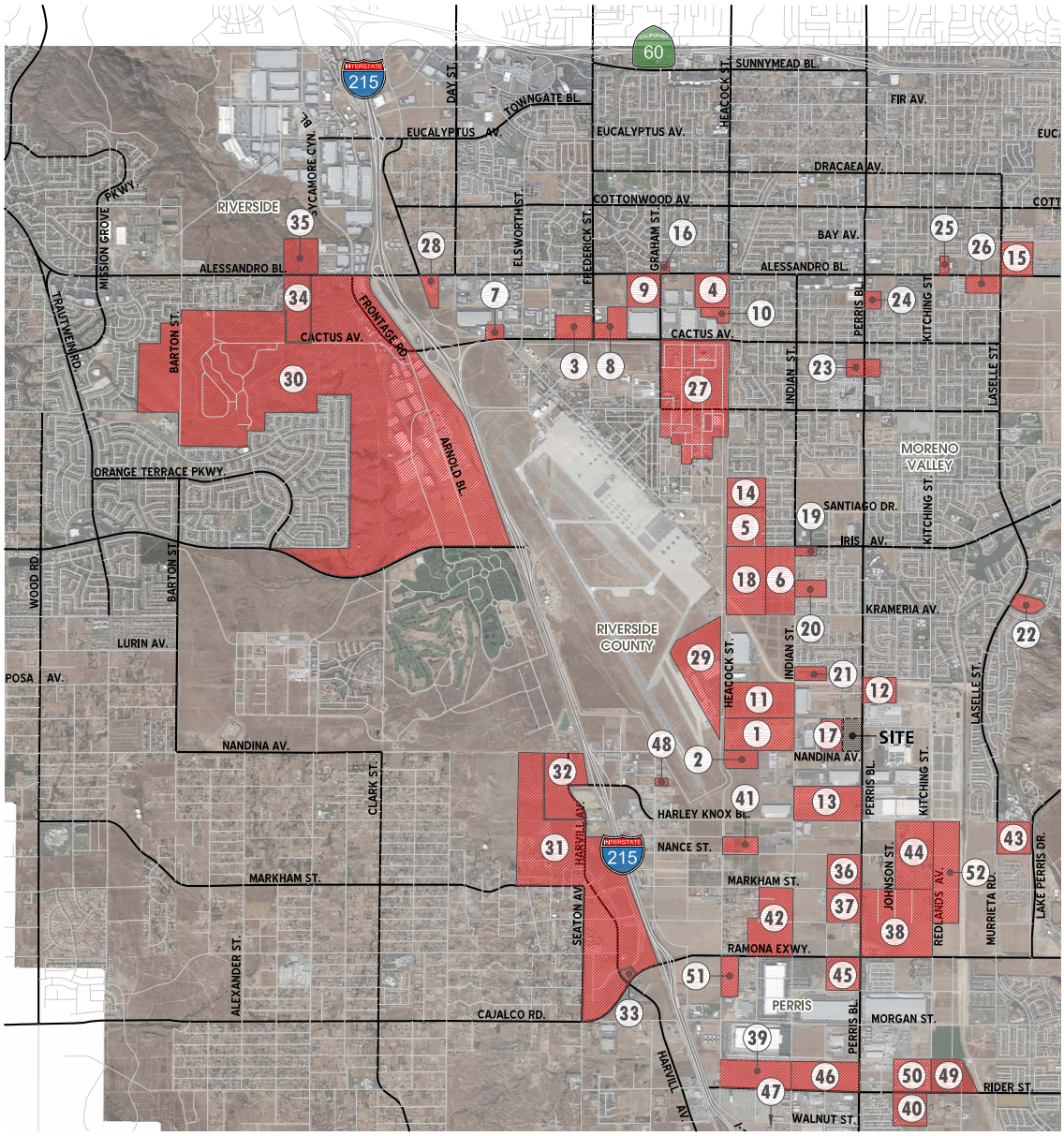
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-13
City of Moreno Valley Truck Routes



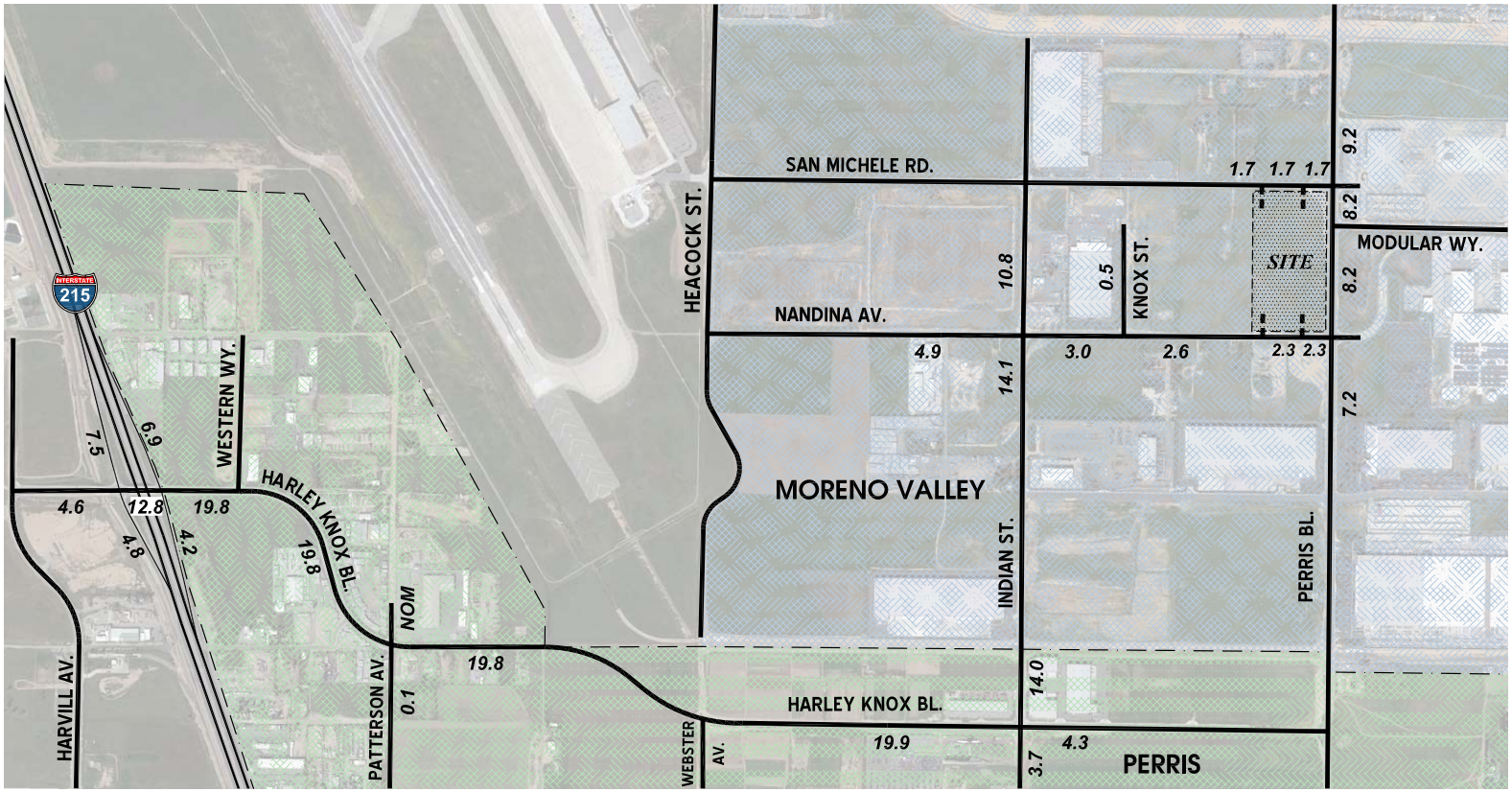
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-14
City of Moreno Valley Level of Service (LOS) Standards



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-15
Cumulative Development Projects Location Map

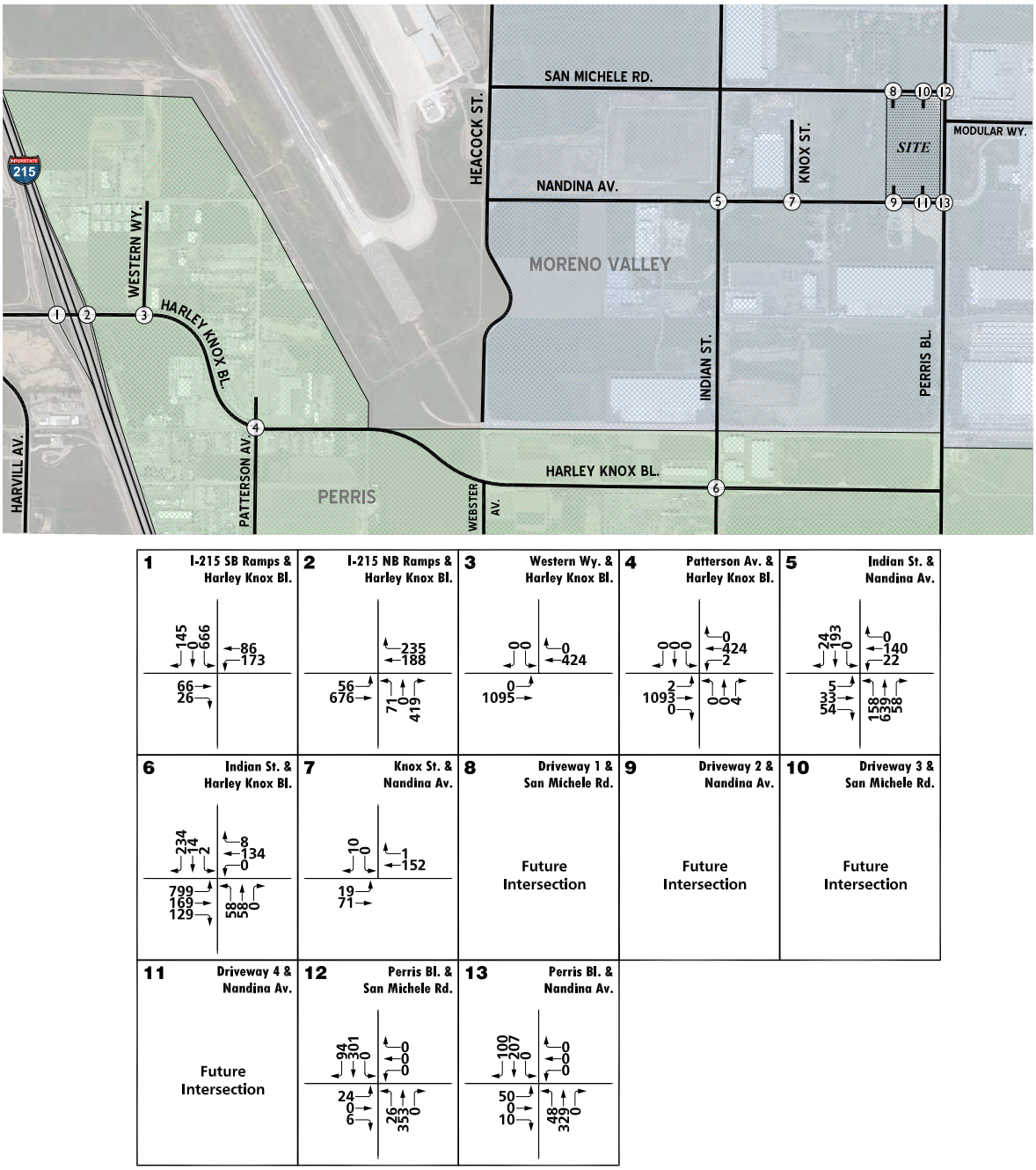


LEGEND:

10.0 = VEHICLES PER DAY (1000'S)
NOM = NOMINAL, LESS THAN 50 VEHICLES PER DAY

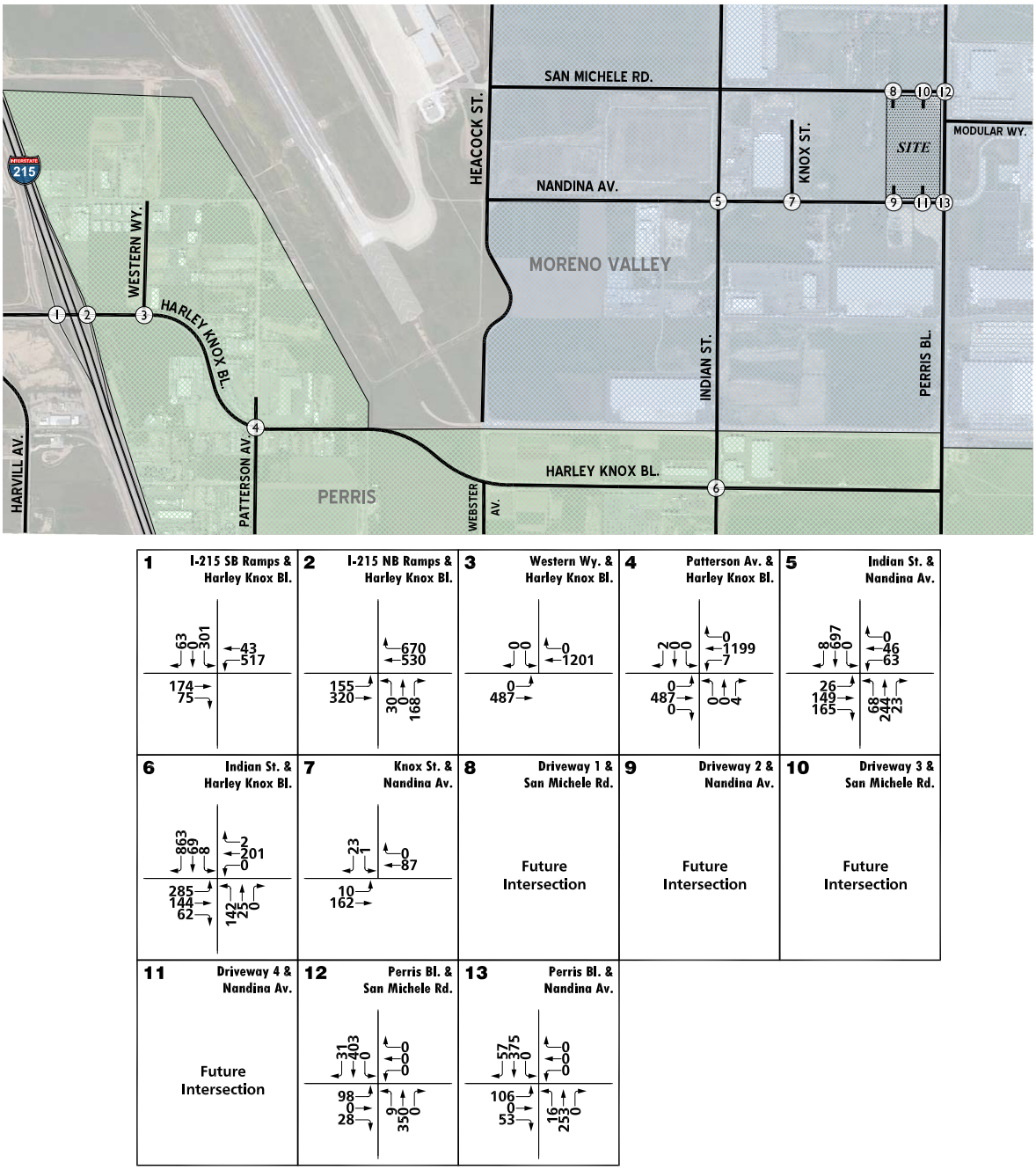
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-16
Cumulative Development Average Daily Traffic (ADT)



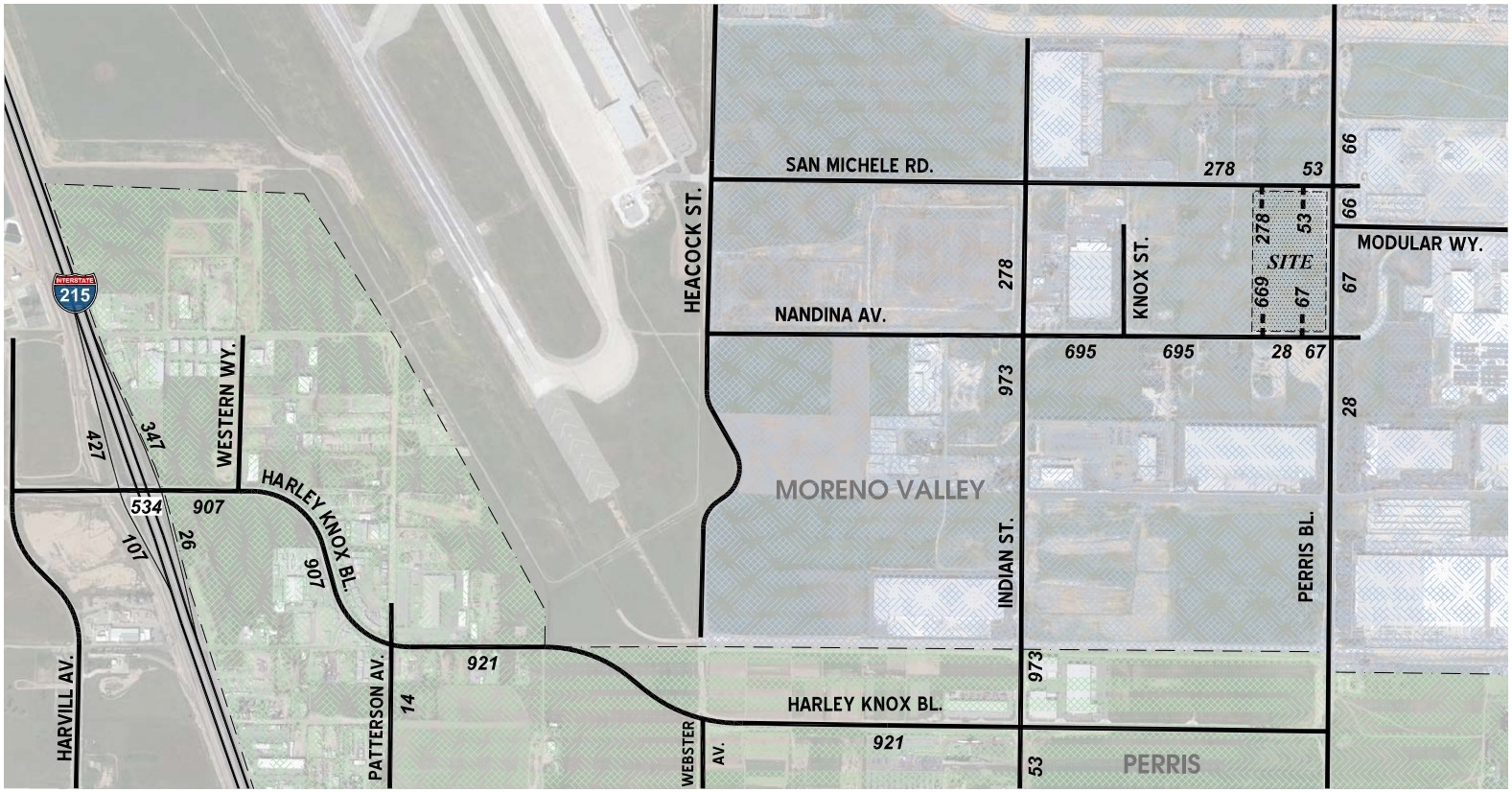
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-17
Cumulative Development AM Peak Hour Intersection Volumes



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-18
Cumulative Development PM Peak Hour Intersection Volumes

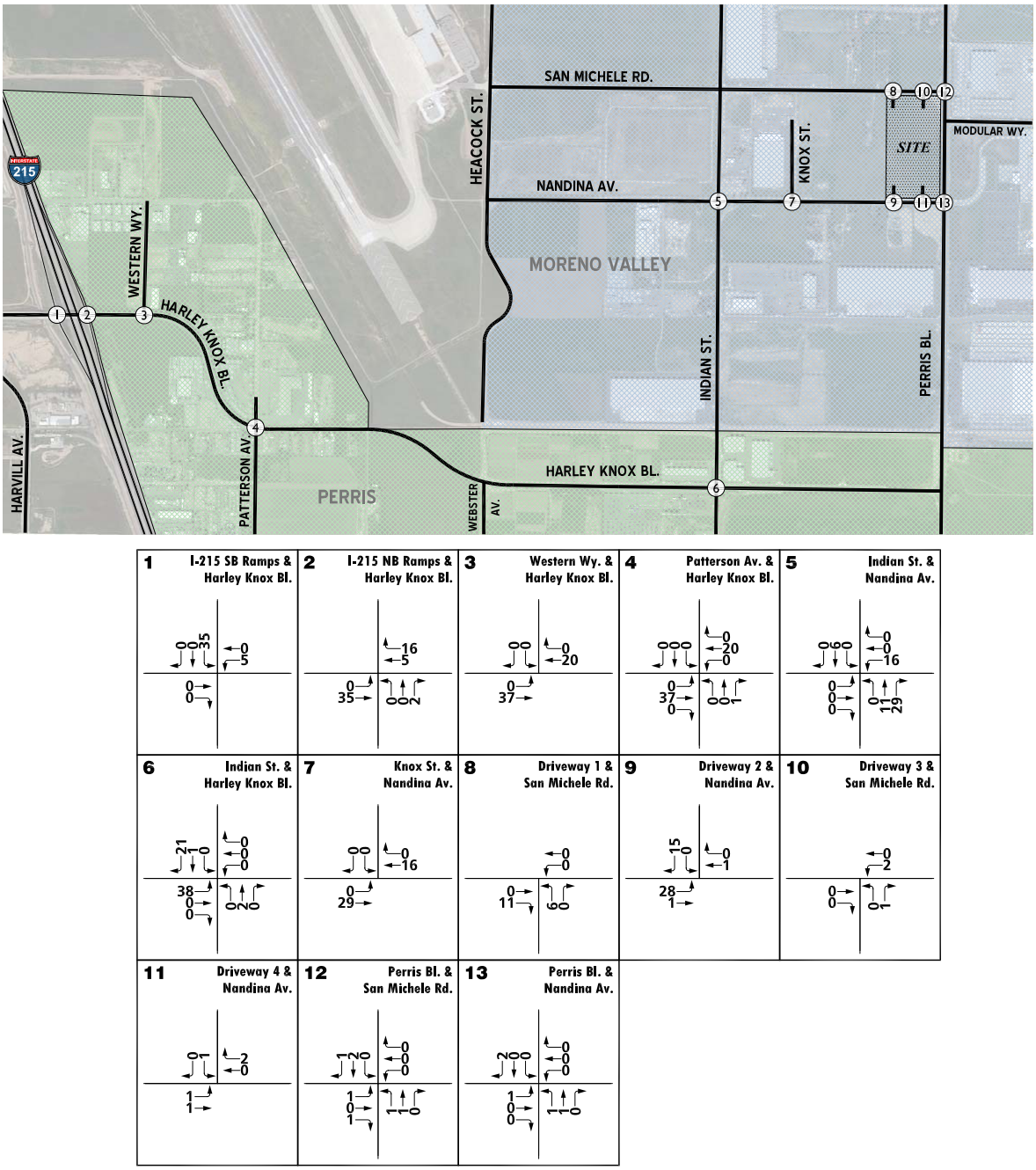


LEGEND:

10 = VEHICLES PER DAY

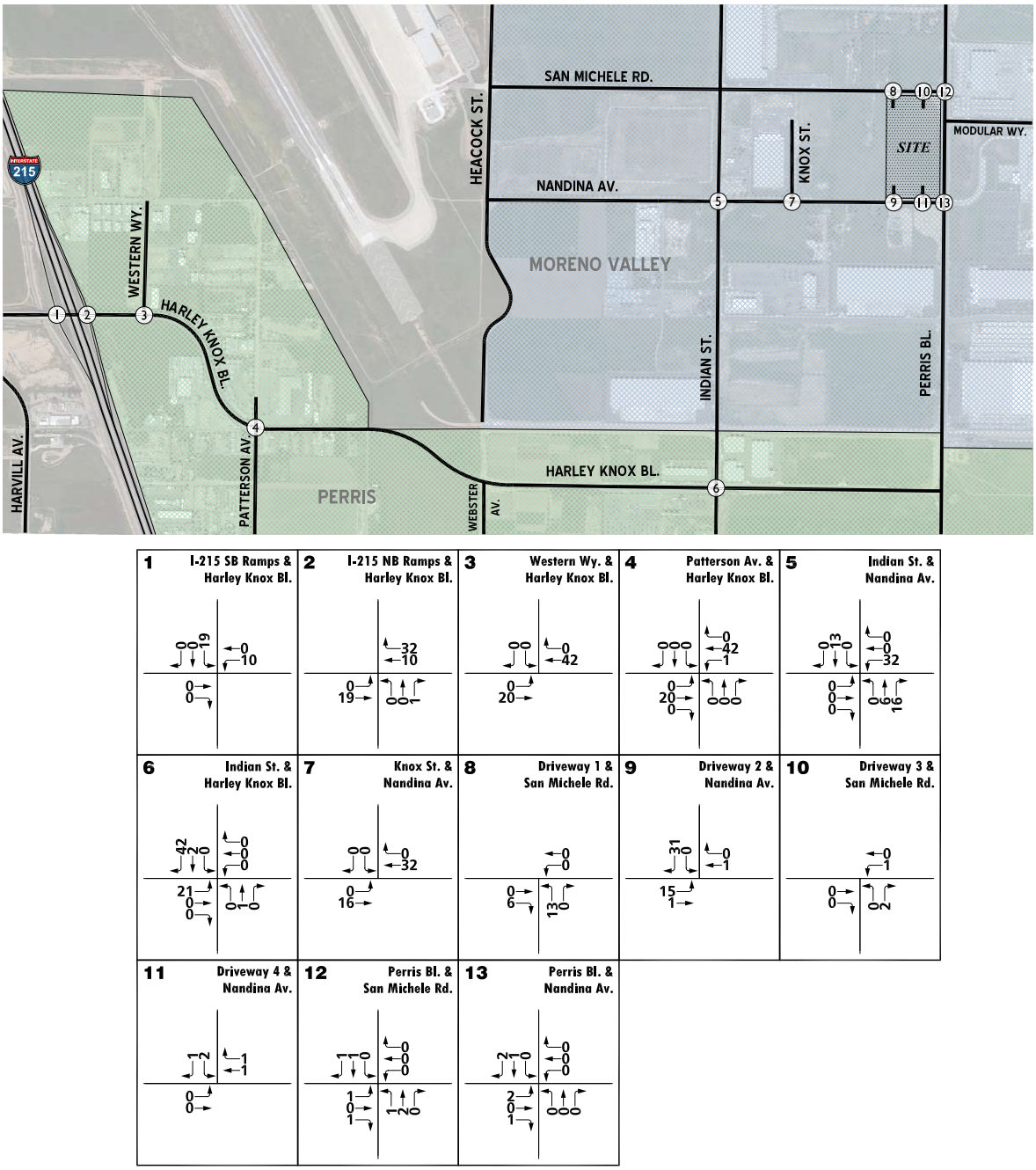
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-19
Project Only Average Daily Traffic (ADT)



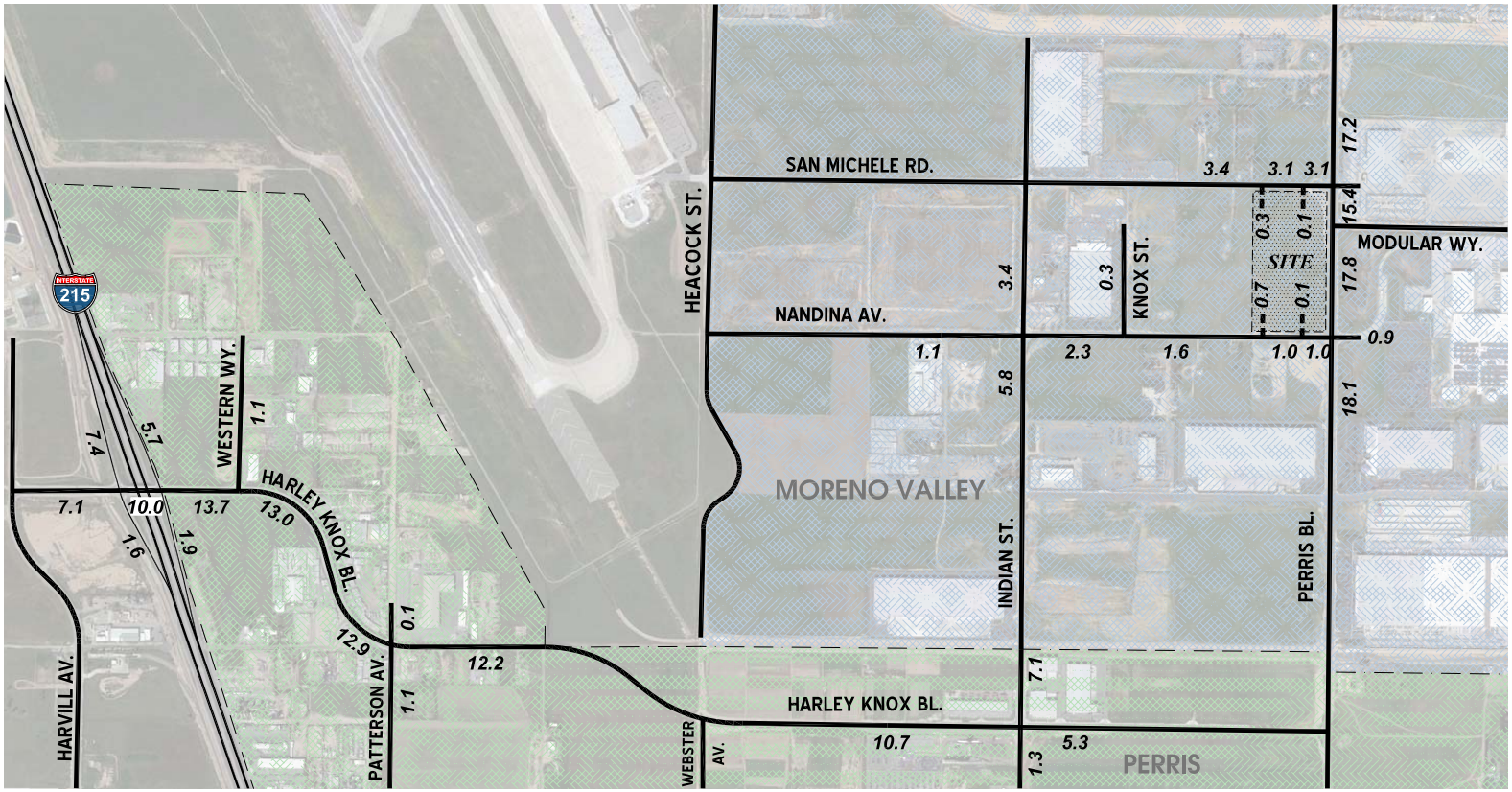
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-20
Project Only AM Peak Hour Intersection Volumes



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-21
Project Only PM Peak Hour Intersection Volumes

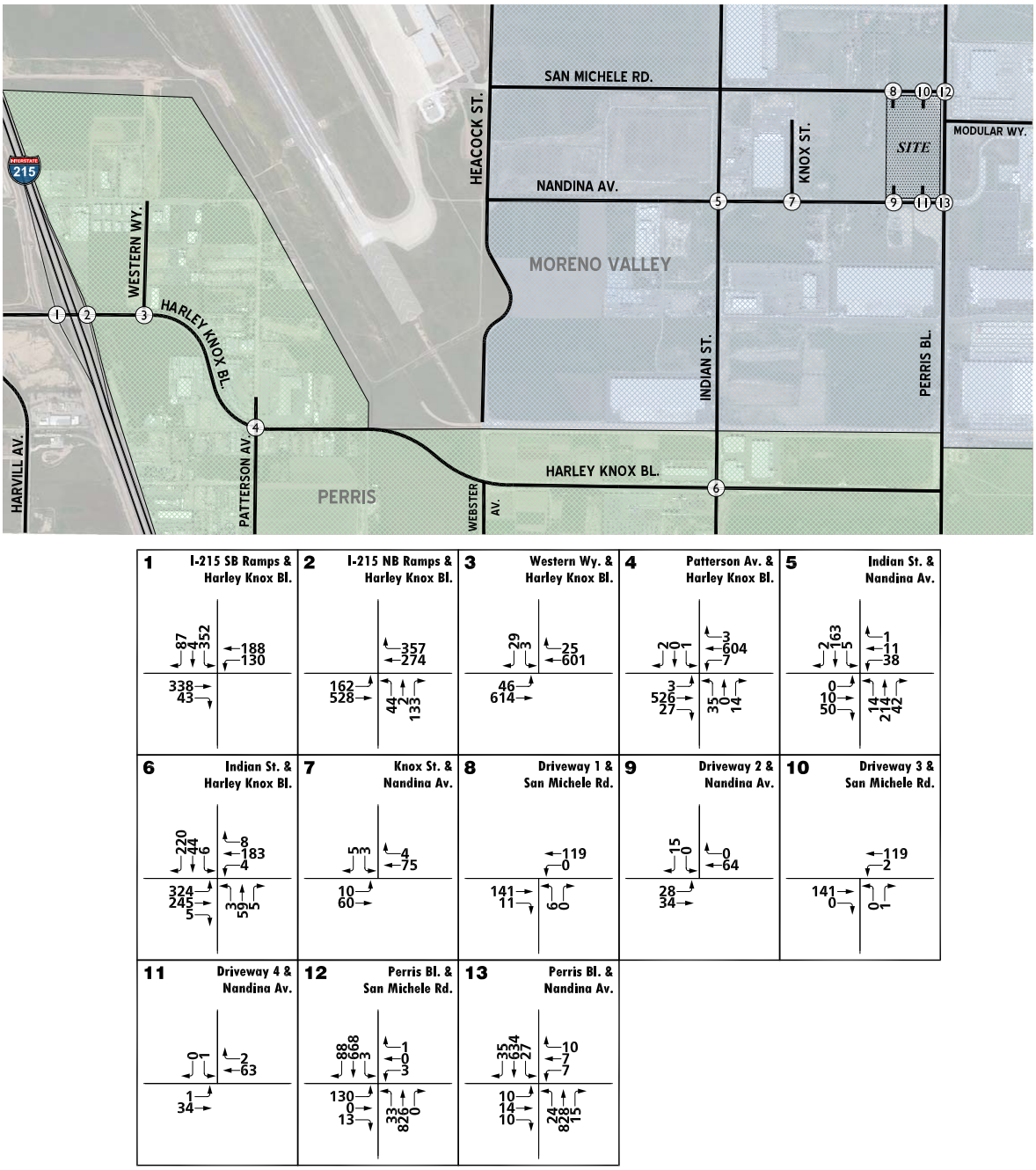


LEGEND:

10.0 = VEHICLES PER DAY (1000'S)

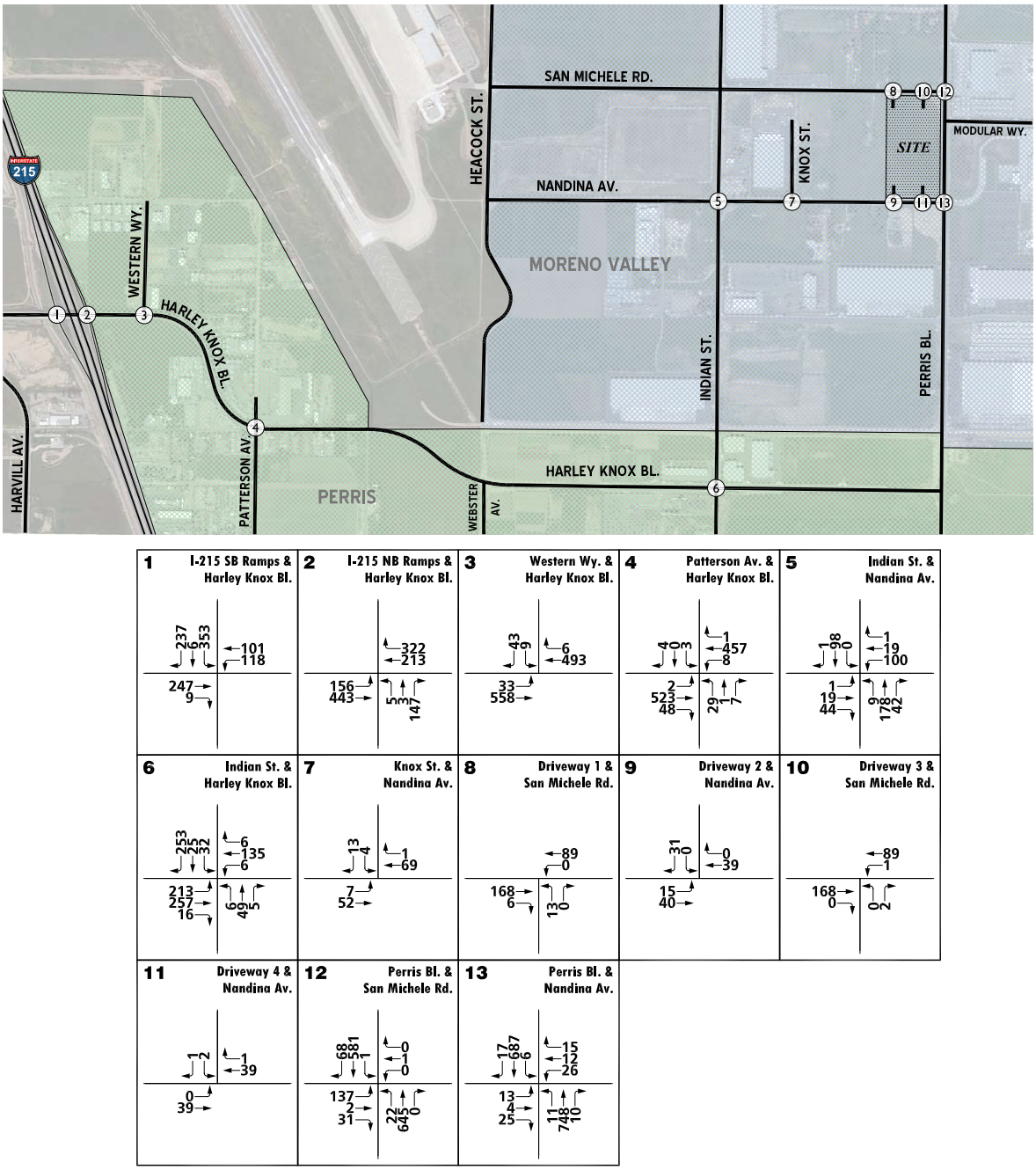
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-22
Existing Plus Project Average Daily Traffic (ADT)



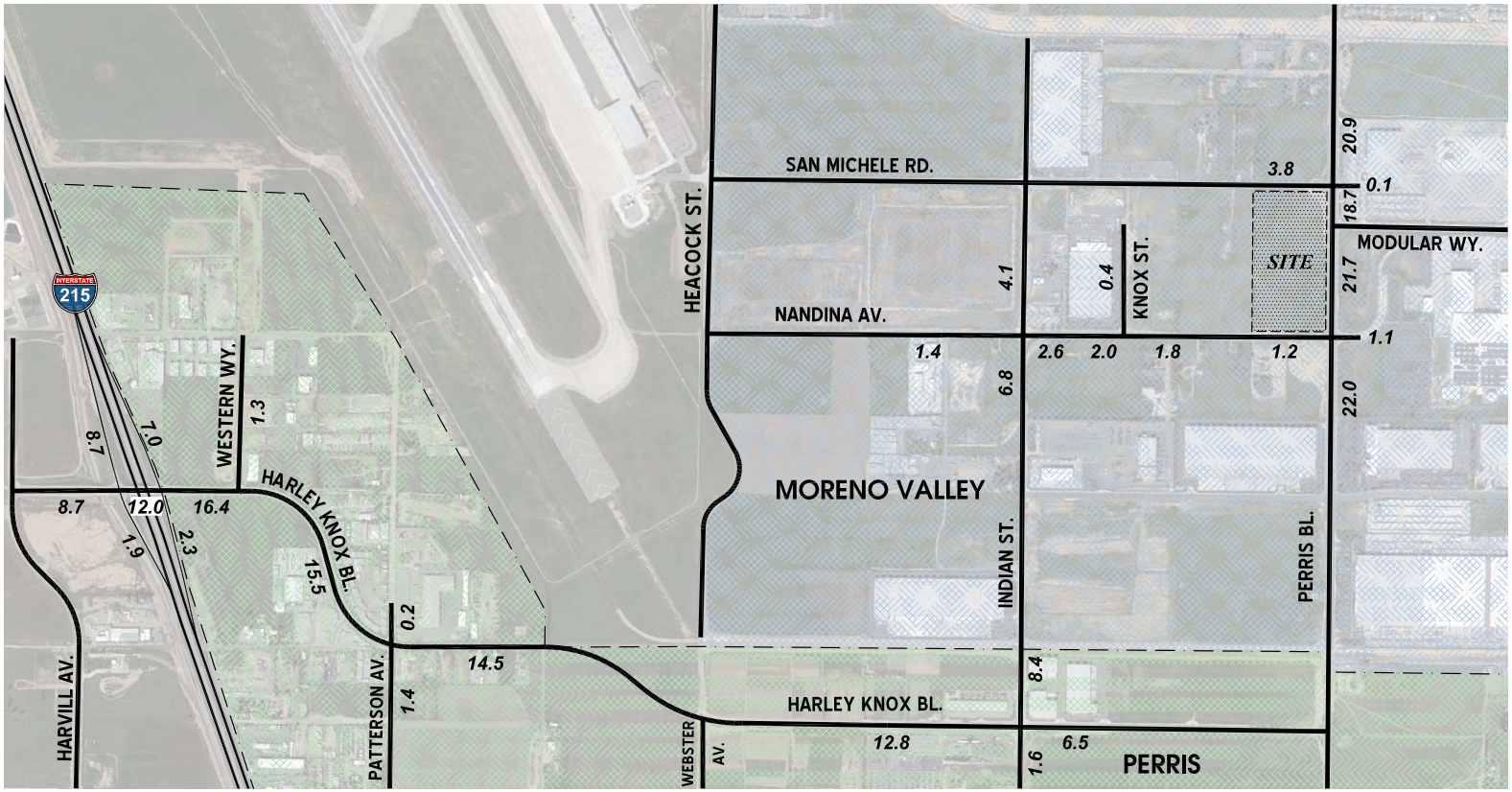
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-23
Existing Plus Project AM Peak Hour Intersection Volumes



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-24
Existing Plus Project PM Peak Hour Intersection Volumes

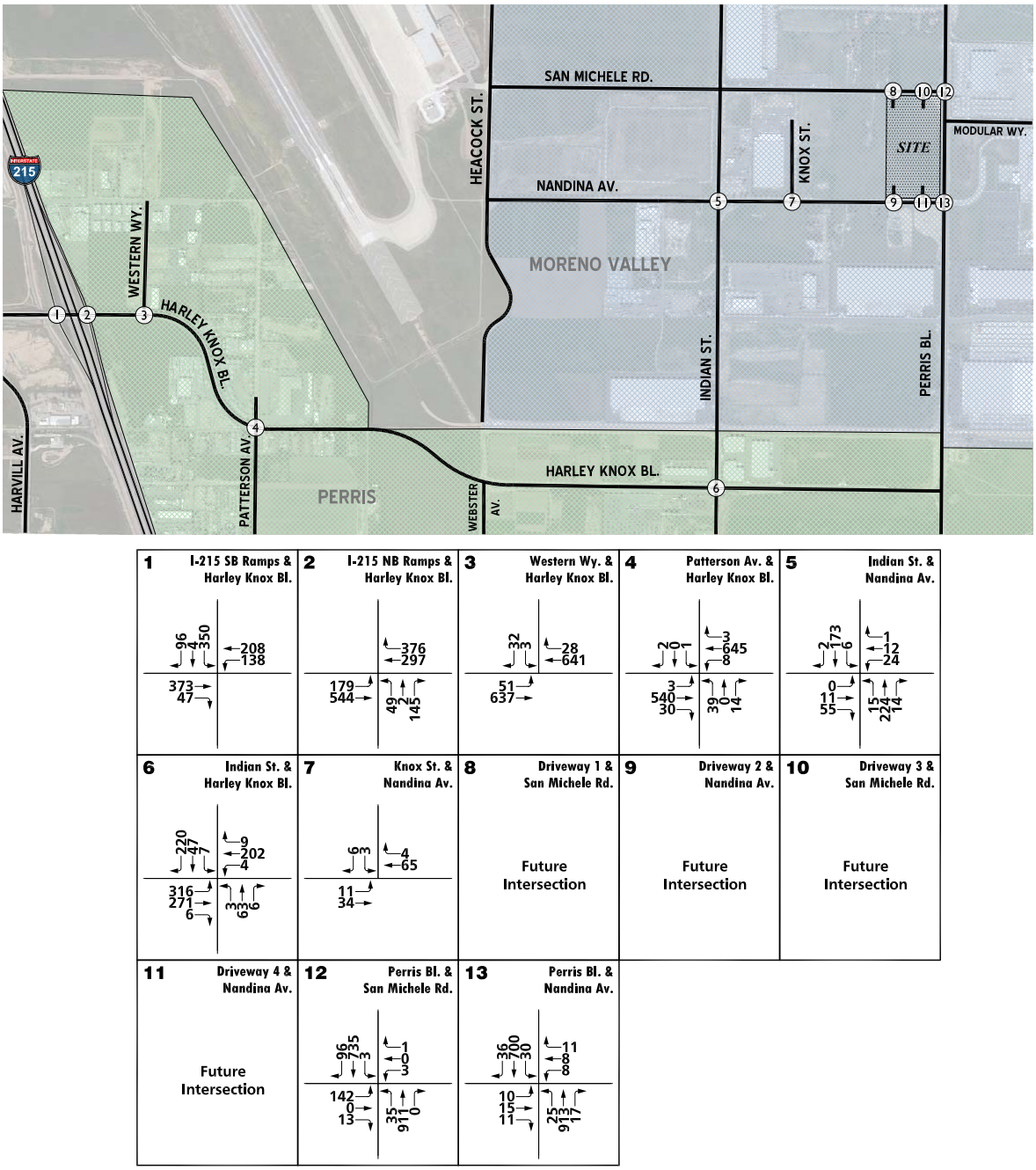


LEGEND:

10.0 = VEHICLES PER DAY (1000'S)

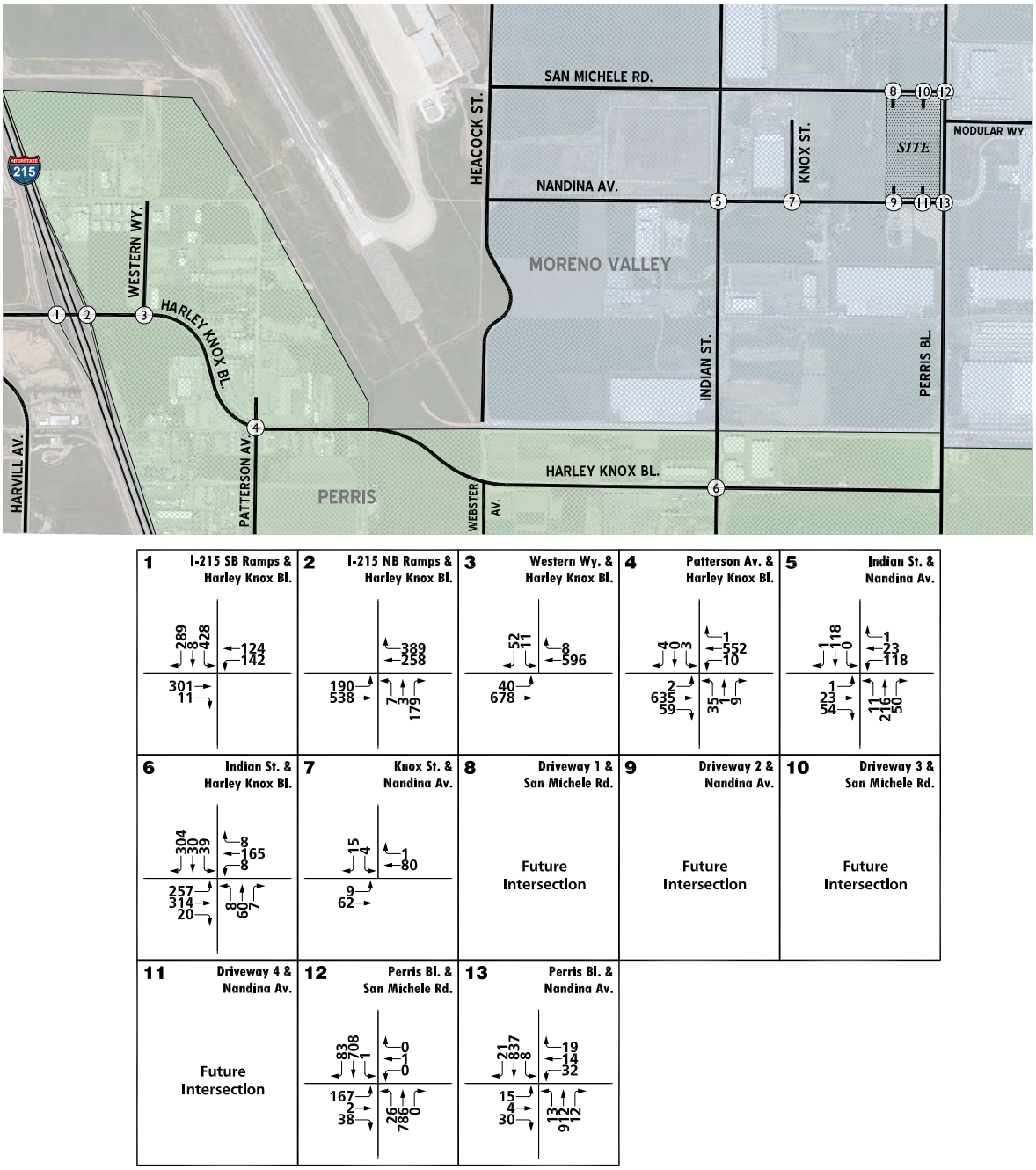
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-25
Opening Year (2017) Without Project Average Daily Traffic (ADT)



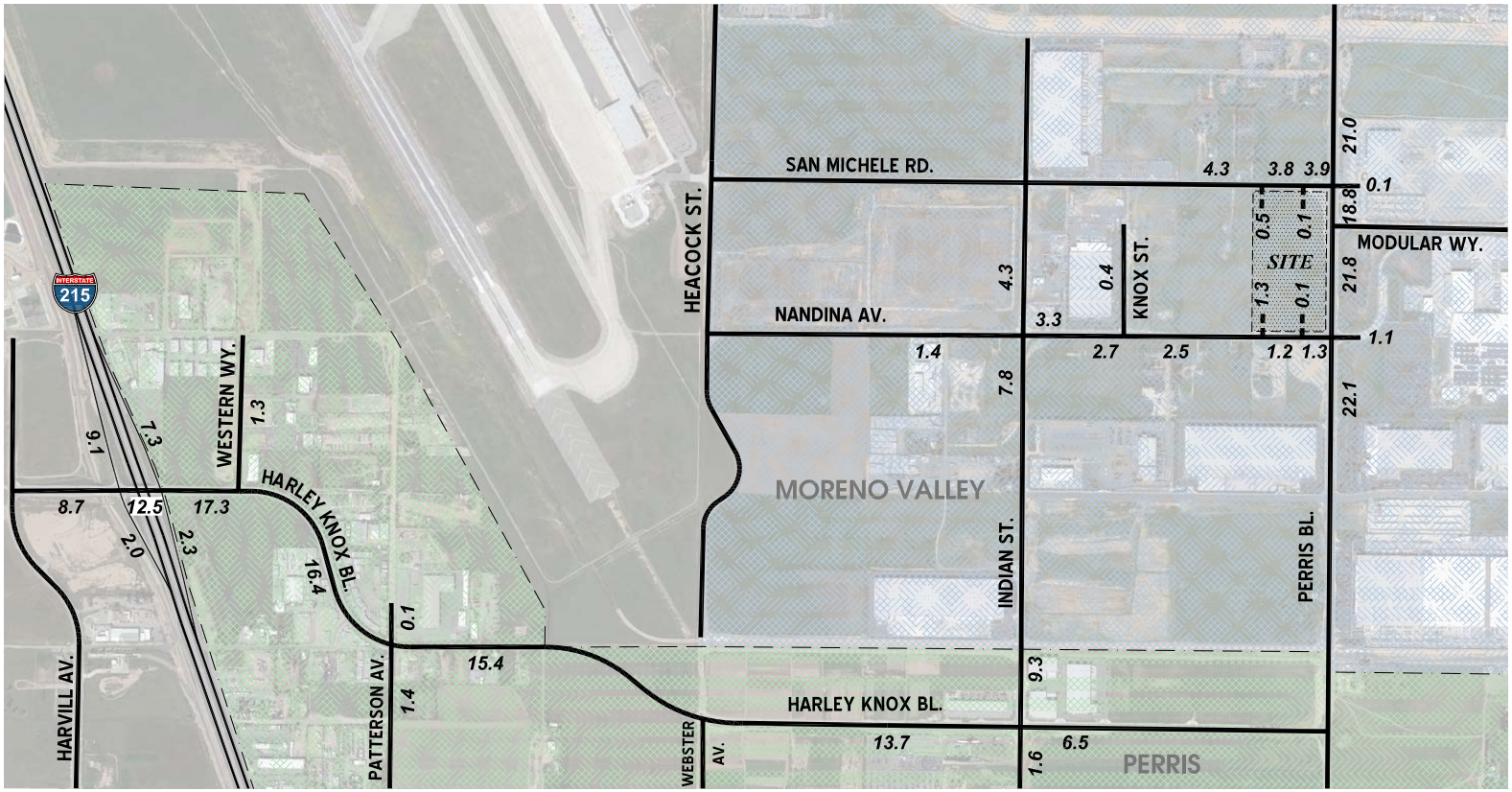
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-26
Opening Year (2017) Without Project AM Peak Hour Intersection Volumes



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-27
Opening Year (2017) Without Project PM Peak Hour Intersection Volumes

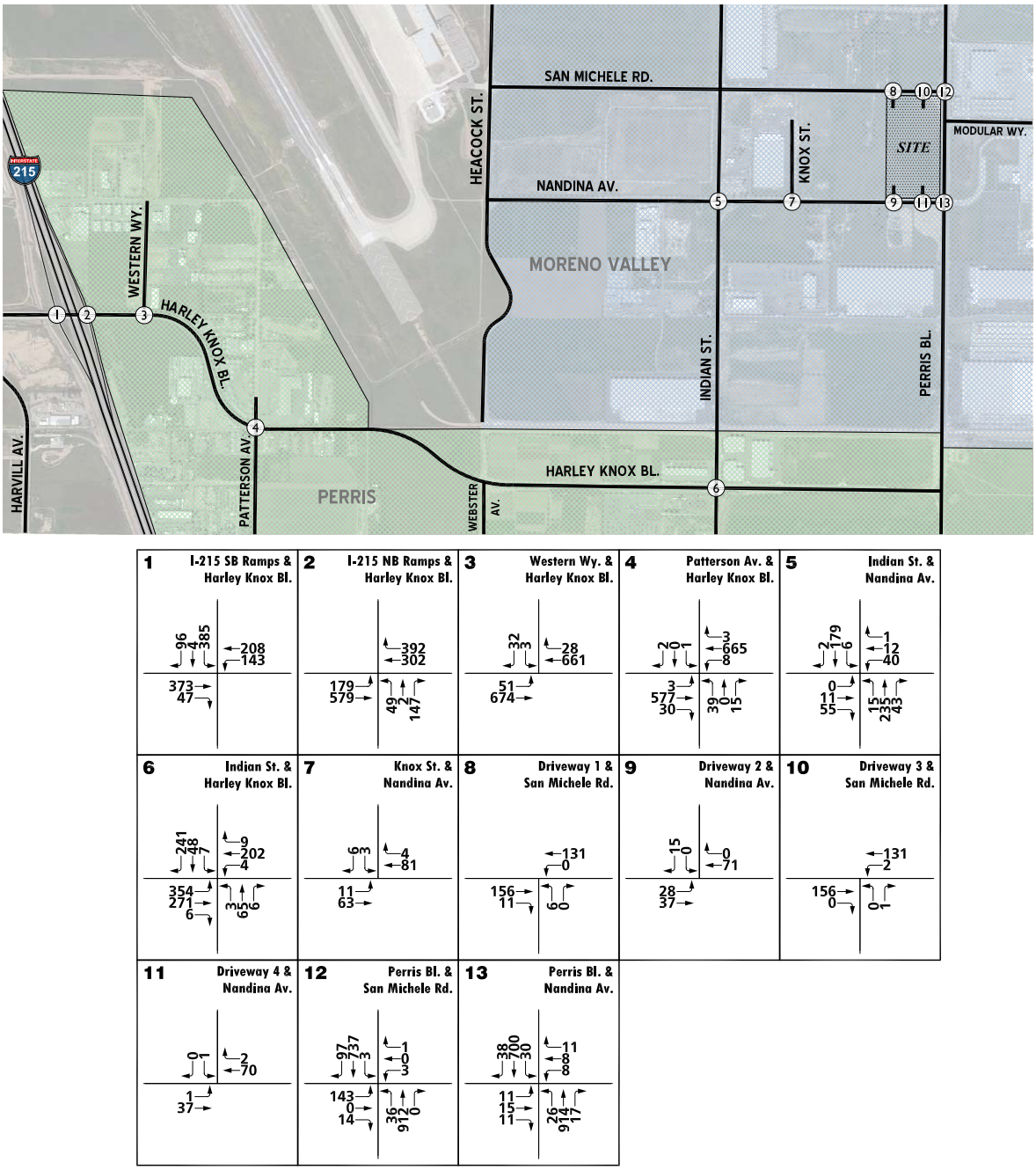


LEGEND:

10.0 = VEHICLES PER DAY (1000'S)

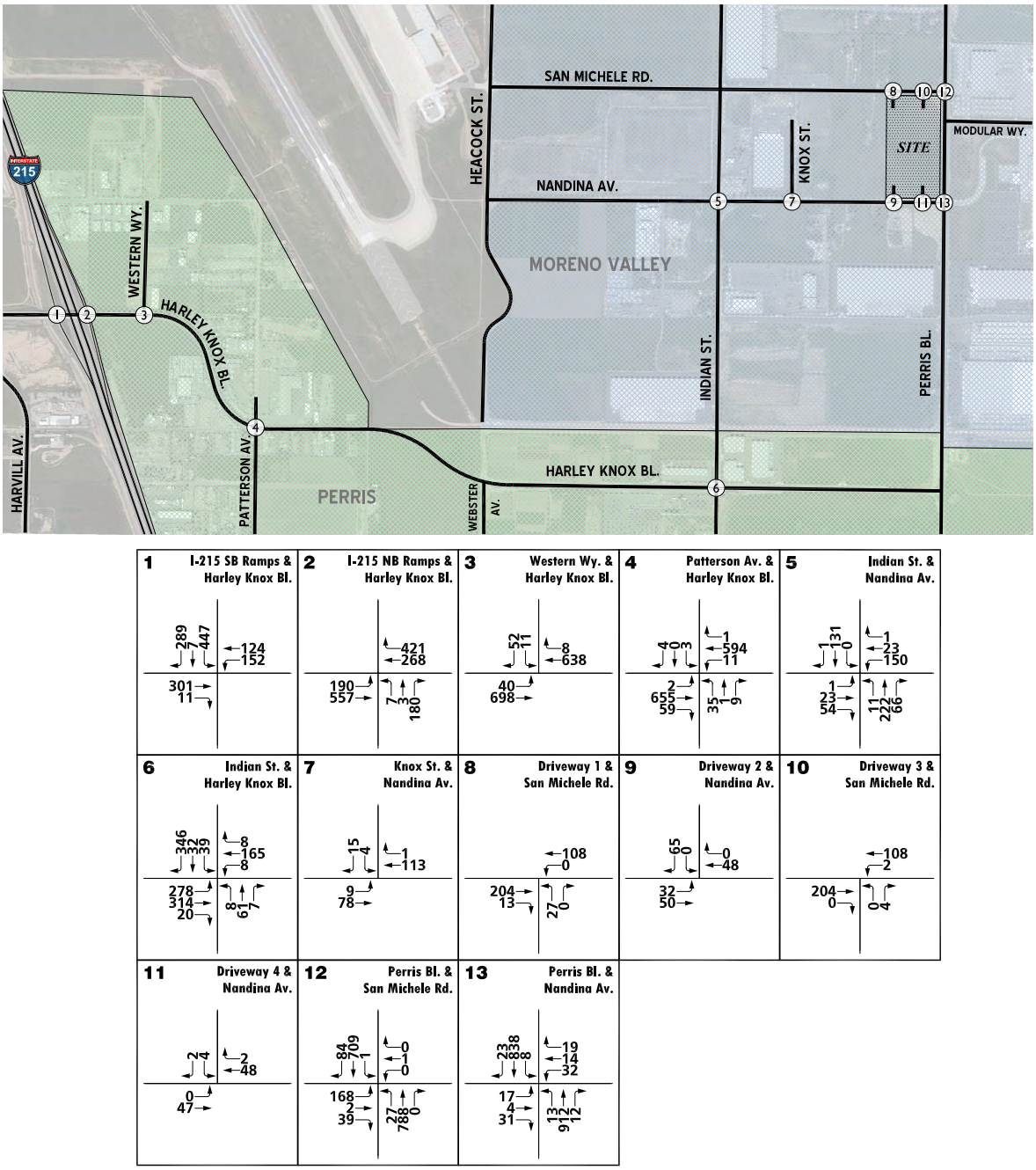
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-28
Opening Year (2017) With Project Average Daily Traffic (ADT)



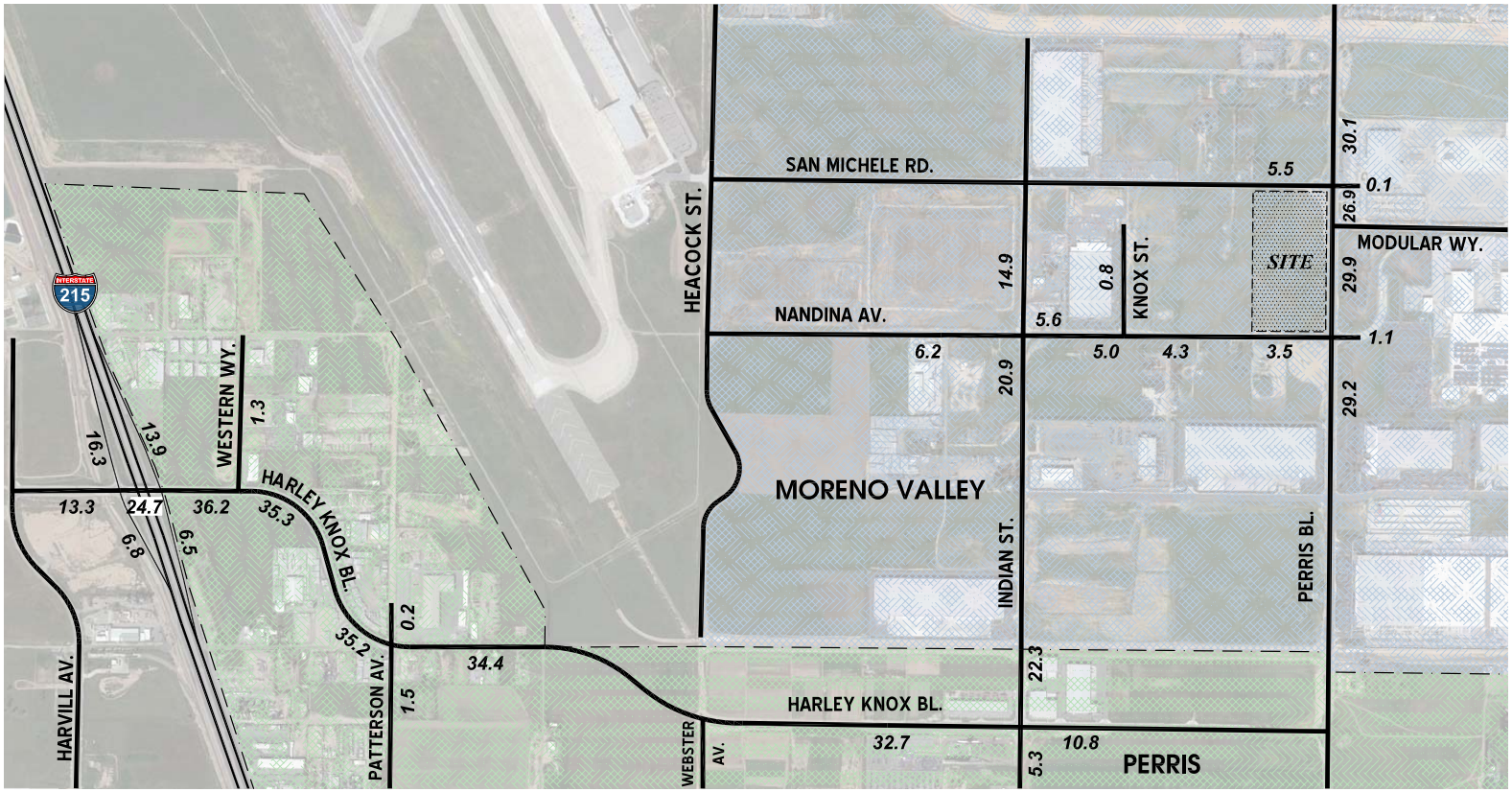
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-29
Opening Year (2017) With Project AM Peak Hour Intersection Volumes



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-30
Opening Year (2017) With Project PM Peak Hour Intersection Volumes

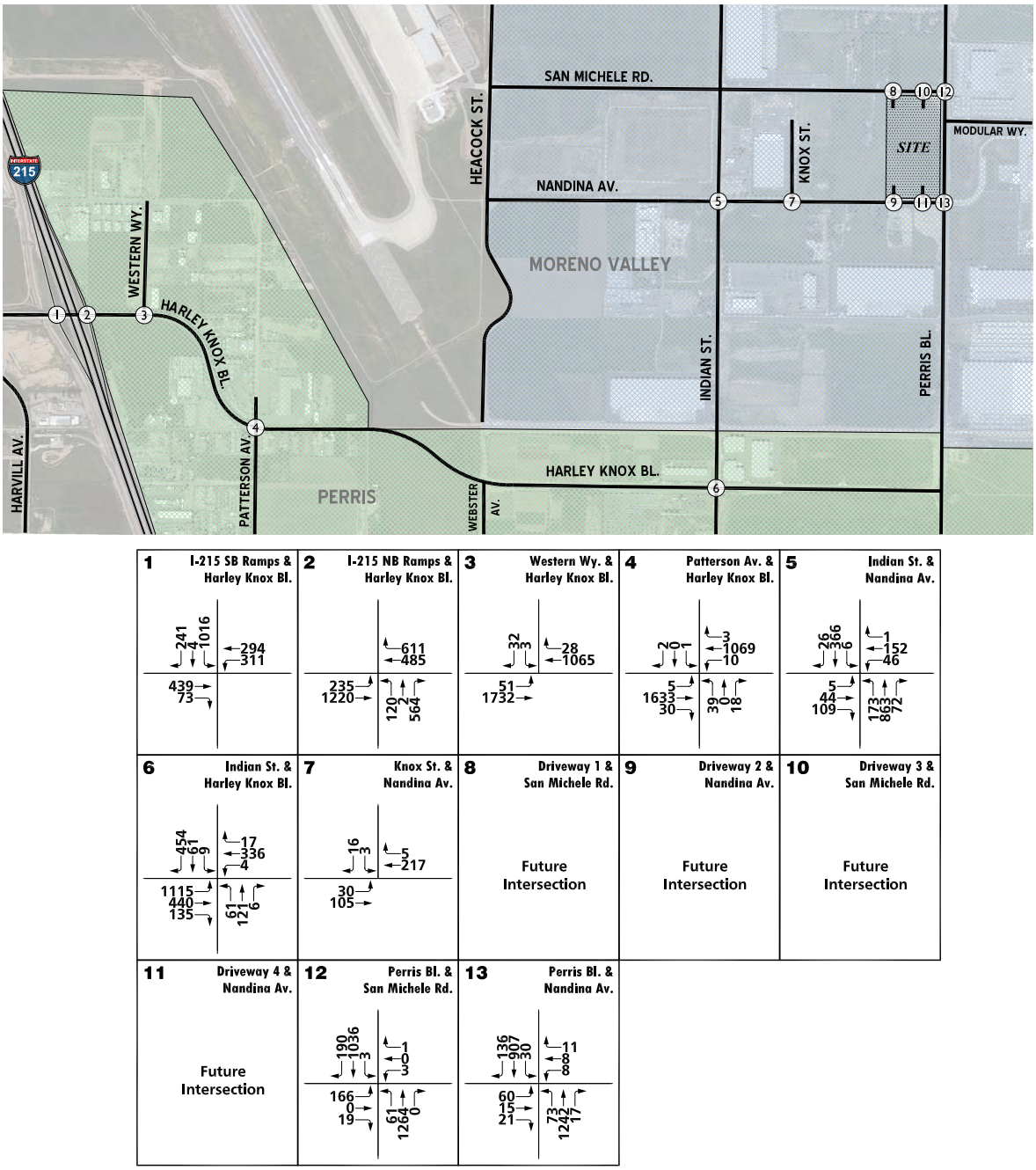


LEGEND:

10.0 = VEHICLES PER DAY (1000'S)

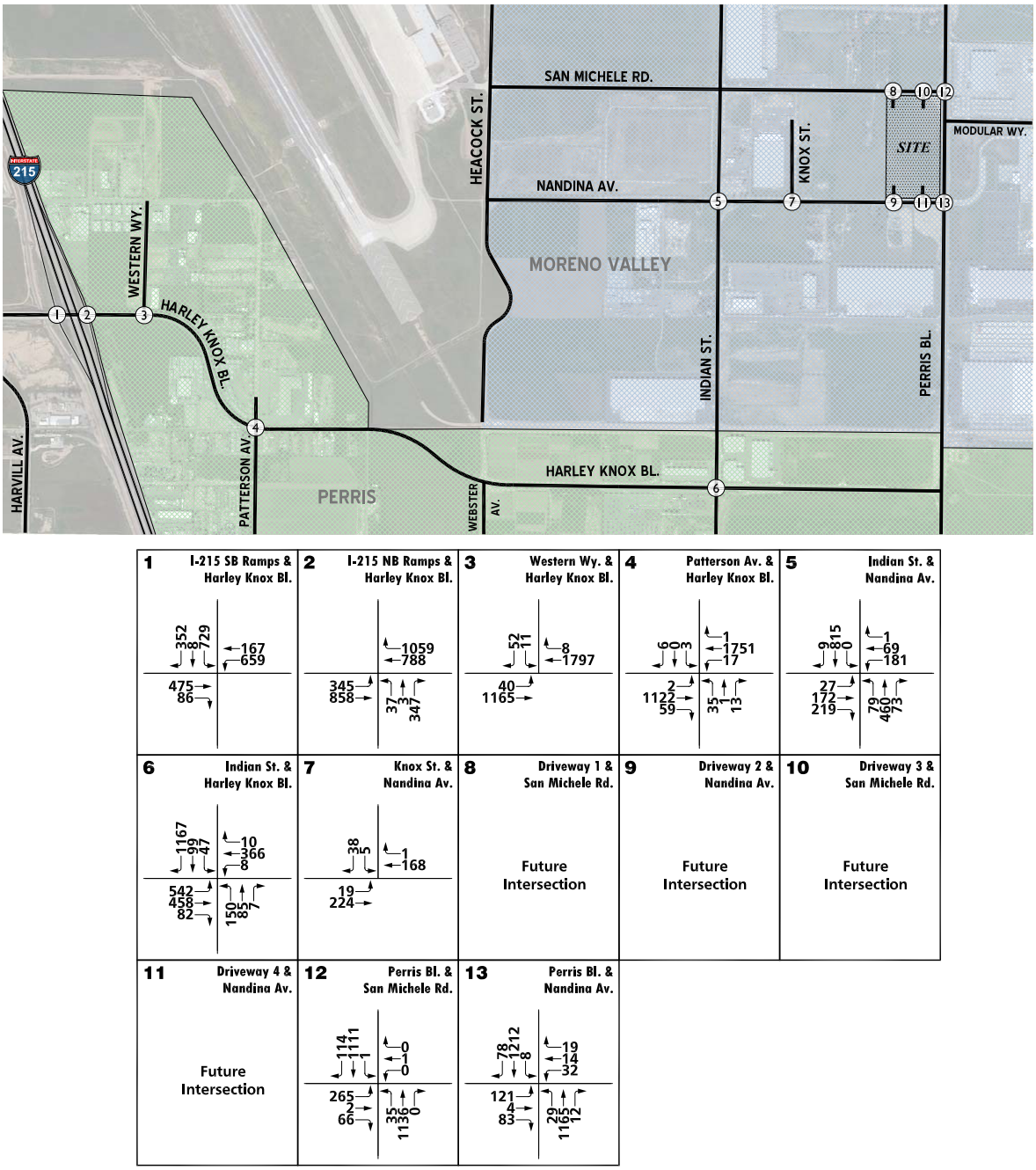
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-31
Opening Year Cumulative (2017) Without Project Average Daily Traffic (ADT)



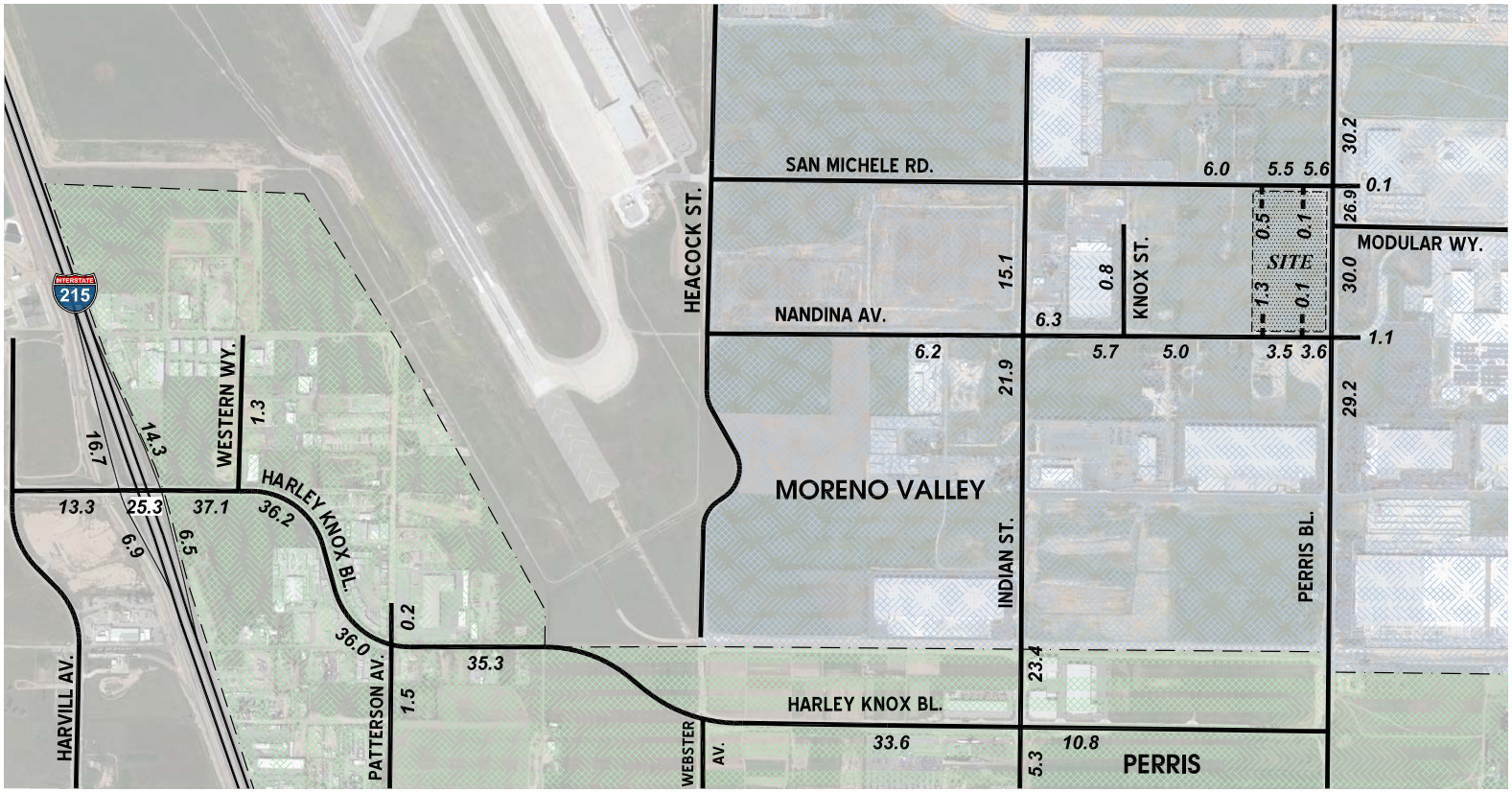
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-32
Opening Year Cumulative (2017) Without Project AM Peak Hour Intersection Volumes



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-33
Opening Year Cumulative (2017) Without Project PM Peak Hour Intersection Volumes

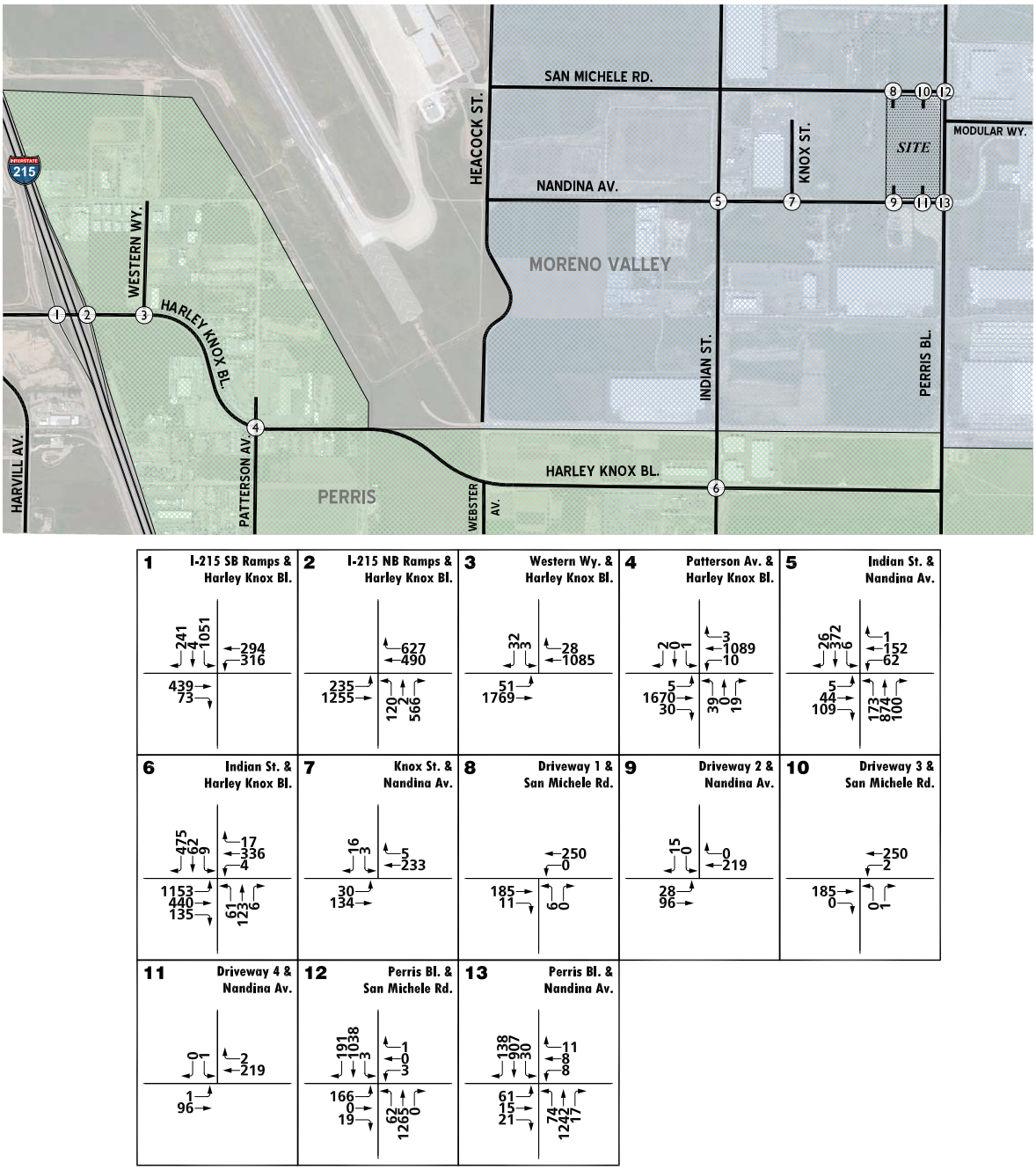


LEGEND:

10.0 = VEHICLES PER DAY (1000'S)

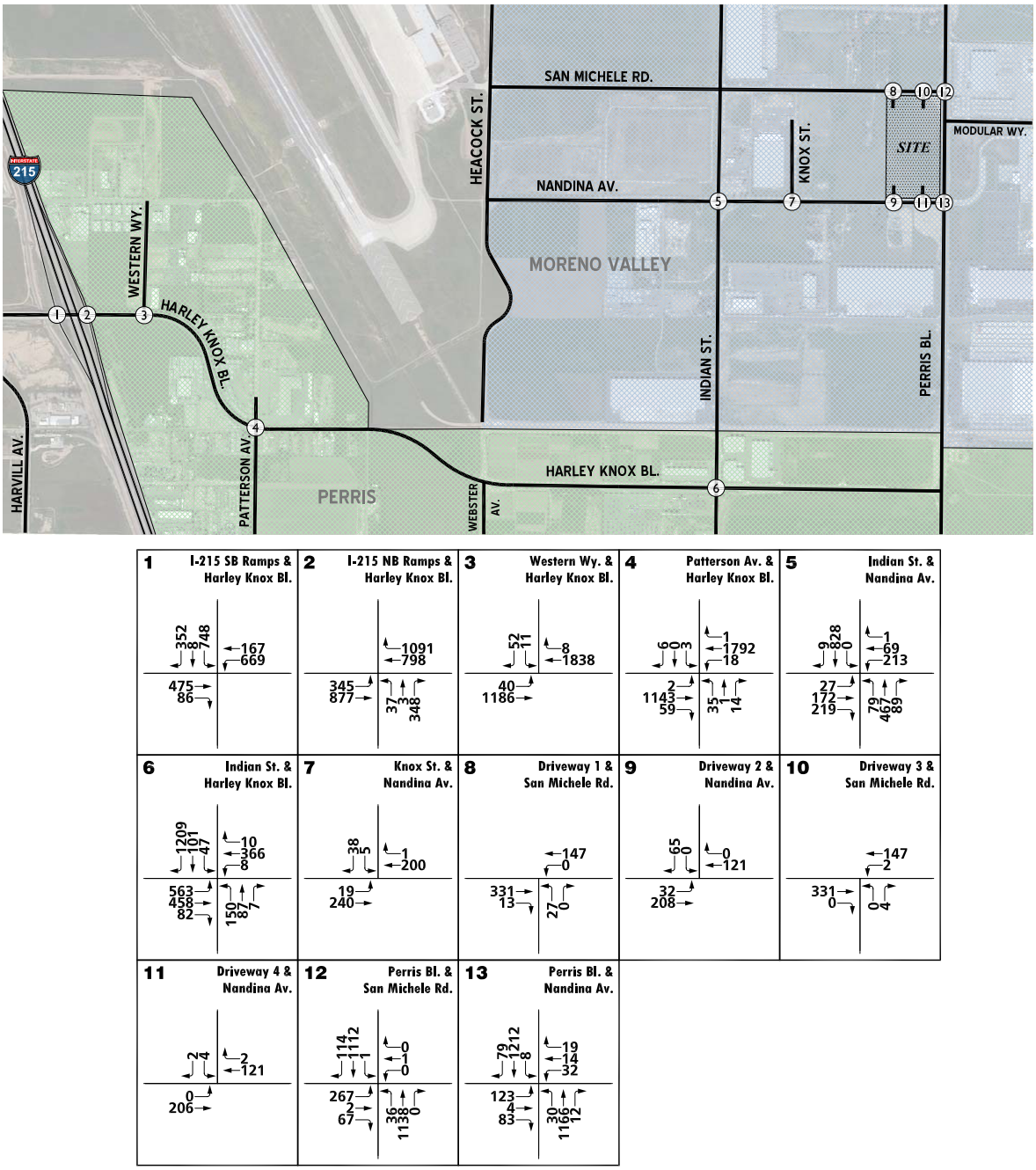
Source: Urban Crossroads (07-06-12)

FIGURE 4.4-34
Opening Year Cumulative (2017) With Project Average Daily Traffic (ADT)



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-35
Opening Year Cumulative (2017) With Project AM Peak Hour Intersection Volumes



Source: Urban Crossroads (07-06-12)

FIGURE 4.4-36
Opening Year Cumulative (2017) With Project PM Peak Hour Intersection Volumes

LEGEND:

100 (250) = AM (PM) PEAK HOUR VOLUMES

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-37
Existing Plus Project I-215 Freeway Mainline Volumes

LEGEND:

100 (250) = AM (PM) PEAK HOUR VOLUMES

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-38

Opening Year (2017) Without Project I-215 Freeway Mainline Volumes

LEGEND:

100 (250) = AM (PM) PEAK HOUR VOLUMES

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-39
Opening Year (2017) With Project I-215 Freeway Mainline Volumes

LEGEND:

100 (250) = AM (PM) PEAK HOUR VOLUMES

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-40

Opening Year Cumulative (2017) Without Project I-215 Freeway Mainline Volumes

LEGEND:

100 (250) = AM (PM) PEAK HOUR VOLUMES

Source: Urban Crossroads (07-06-12)

FIGURE 4.4-41

Opening Year Cumulative (2017) With Project I-215 Freeway Mainline Volumes

4.5 BIOLOGICAL RESOURCES

This subsection assesses the Project's potential to impact sensitive biological resources that may be present on the subject property or that could be otherwise affected by the Project. The analysis is based in part on information contained in a site-specific technical report titled, "Biological Technical Report for First Inland Logistics Center II," prepared by URS Corporation (URS), and dated January 4, 2012. This report is provided as *Technical Appendix G* to this EIR (URS Corporation, 2012a). The Biological Technical Report is accompanied by a Focused Burrowing Owl Survey (dated June 29, 2012) and a Focused Special Status Plant Survey (dated June 29, 2012), also prepared by URS, which are provided as *Technical Appendices G1* (URS Corporation, 2012b) and *G2* (URC Corporation, 2012c), respectively.

4.5.1 EXISTING CONDITIONS

A. Scope and Methodology

Biologists/Regulatory Specialists from URS conducted a site-specific evaluation of biological resources present or potentially present on the Project site. For this evaluation a biological study area (BSA) for the field survey was defined as 9.0 acres of undeveloped land plus a 250-foot buffer (URS Corporation, 2012a). The BSA did not include the 8.3-acre trailer parking yard on the Project site because that area is developed and has no potential to contain sensitive biological resources. Methods of study included a review of relevant literature and databases, pedestrian based field surveys and wildlife observations. URS assessed resources within the Project's BSA using methodologies and accepted scientific and technical standards and survey guideline requirements issued by the U.S. Fish and Wildlife Service (USFWS), the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), and the Western Riverside County MSHCP (URS Corporation, 2012a).

The field studies also focused on a number of primary objectives that satisfy the special provisions of the Western Riverside County MSHCP and also comply with CEQA requirements, including: (1) general reconnaissance surveys and vegetation mapping; (2) general wildlife surveys; (3) habitat assessments and surveys for special-status plants (including species with applicable MSHCP survey requirements); and (4) habitat assessments and focused surveys for special-status animals (including species with applicable MSHCP survey requirements). Observations of plant and wildlife species were recorded during each of the above mentioned survey efforts (URS Corporation, 2012a).

Please refer to Section 2.0 of the Biological Technical Report (*Technical Appendix G*) for a detailed description of the scope and methodology used for the general biological resources assessment.

B. Existing Vegetation Communities

One vegetation/land use type is present on the Project site; developed and disturbed land. Table 4.5-1, *Summary of Vegetation Communities/Land Uses*, provides a summary of vegetation acreage for the Project site. The remaining 8.3 acre area of the property is developed as a trailer parking yard. A detailed description of the vegetation/land use type is provided below.

Table 4.5-1 Summary of Vegetation Communities/Land Uses

VEGETATION	ACREAGE
Developed/Disturbed Land	9.0 [1]
Trailer Parking Yard	8.3
Total	**17.3**

Source: (URS Corporation, 2012a), *Table 1.*
[1] *Acreage is rounded*

❑ Developed/Disturbed Land

Approximately 9.0 acres of the Project site consists of developed/ disturbed lands. No native habitat exists within this area. Disturbed habitat areas are dominated by sparse non-native grasses and annual species. These habitats are non-sensitive.

❑ Trailer Parking Yard

Approximately 8.3 acres of the Project site is developed as a trailer parking yard. This area is paved, with the exception of ornamental landscaping installed adjacent to Perris Boulevard and a linear-shaped detention/water quality basin and ornamental landscaping installed adjacent to Nandina Avenue. This area contains no sensitive vegetation communities

C. Special Status Plants

An evaluation of plant species on the 9.0-acre undeveloped portion of the Project site was conducted by URS on January 4, 2012. The Biological Technical Report (*Technical Appendix G* Table 2) provides a list of the special-status plants evaluated for potential occurrence on the Project site. Plant species were considered based on a number of factors, including: 1) species identified by the California Natural Diversity Database (CNDDB) as occurring (either currently or historically) on or in the vicinity of the Project site, 2) Western Riverside County MSHCP survey areas, and 3) any other special-status plants that are known to occur within the vicinity of the property, or for which potentially suitable habitat occurs on the Project site.

❑ Narrow Endemic and Criteria Area Plants

The Project site is located within the Western Riverside County MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA). During the general biological field evaluation conducted on January 4, 2012, URS looked for the twenty one (21) special status plant species which were reported to grow in the area; however, none of the species were observed. A focused survey for special status plants was conducted on June 7, 2012 per the requirements of the MSHCP (URS Corporation, 2012c). The focused assessment increased the BSA from a 250-foot to 500-foot buffer. The focused assessment searched for potential suitable habitats and identified the presence of one special-status plant species. Smooth tarplant (*Centromadia pungens ssp. laevis*) was detected on the site. Smooth tarplant is a CNPS List 1B.1 species and is a criteria area plant species survey area (CAPSSA) species under the MSHCP. Due to surrounding land use consisting primarily of developed parcels and the limited number of individuals plants; it is unlikely that this species would increase in population.

C. Special Status Animals

The 9.0-acre undeveloped portion of the Project site was evaluated by URS for the presence of special status animal species. The Biological Technical Report (*Technical Appendix G* Table 3) provides a list of special-status animals that were evaluated for their potential to occur in the BSA, including MSHCP Covered Species with additional survey requirements. Species were evaluated based on a number of factors, including: 1) species identified by the CNDDB as occurring (either currently or historically) on or in the vicinity of the property, 2) MSHCP species survey areas applicable to the property, and 3) any other special-status animals that are known to occur within the vicinity of the property, or for which potentially suitable habitat occurs on the site.

❑ Special Status Animals Observed On-Site

One special-status animal species was observed within the BSA during the biological field surveys; the California horned lark (*Eremophila alpestris actia*). The California horned lark is a MSHCP Covered Species, indicating that any impacts to this species are covered by the MSHCP.

o *California Horned Lark (Eremophila alpestris actia)*

The California horned lark does not have a federal or state designation; however, this species is on the State Watch List. Additionally, the California horned lark is a Covered Species under the MSHCP. It has a holarctic distribution, ranging from the Arctic south to central Asia and Mexico with outlying populations in Morocco and Colombia. In general, the northernmost populations are migratory, moving south during the winter into remaining areas of the breeding range.

The California horned lark is a common to abundant resident in a variety of open habitats, usually where trees and large shrubs are absent. Range-wide, California horned larks breed in level or gently sloping shortgrass prairie, montane meadows, "bald" hills, open coastal plains, fallow grain fields, and alkali flats. Within Southern California, California horned larks breed primarily in open fields, (short) grasslands, and rangelands. Grasses, shrubs, forbs, rocks, litter, clods of soil, and other surface irregularities provide cover.

❑ Special Status Animals with a Potential to Occur On-Site

One special-status animal that has potential to occur at the Project site is the western burrowing owl (*Athene cunicularia hypugaea*). The Project site is located within the Western Riverside County MSHCP burrowing owl survey area; therefore, a MSHCP protocol burrowing owl survey was performed. A focused burrow survey was completed by URS on June 7, June 11, June 12,and June 20, 2012. As a result of the focus survey, ten burrows were observed; however, no burrowing owls or their signs were found with the potential burrows.

D. MSHCP Riparian/Riverine Areas and Vernal Pools

The Project site contains no drainages or vegetation that meets the definition of riparian or riverine habitat. Therefore, the Project site does not contain any MSHCP Riparian/Riverine areas. Additionally, the Project site lacks suitable habitat for wetland habitats and does not contain any MSHCP vernal pools.

E. Regulatory Setting

The proposed Project is subject to state and federal regulations associated with a number of regulatory programs. These programs often overlap and were developed to protect natural resources, including: state and federally listed plants and animals; aquatic resources including rivers and creeks, ephemeral streambeds, wetlands, and areas of riparian habitat; other special-status species which are not listed as threatened or endangered by the state or federal governments; and other special-status vegetation communities. Provided below is an overview of the federal, state, and regional laws, regulations, and requirements that apply to the proposed Project. For more information, refer to Technical Appendix *G*.

❑ State and/or Federally Listed Plants and Animals

o *State of California Endangered Species Act*

California's Endangered Species Act (CESA) provides definitions for endangered species, threatened species, and candidate species of California. Listed endangered and threatened species are protected by the CESA and candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Article 3, Sections 2080 through 2085, of the CESA addresses the taking of threatened, endangered, or candidate species by stating "No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided." Under the CESA, "take" is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Exceptions authorized by the state to allow "take" require permits or memoranda of understanding and can be authorized for endangered species, threatened species, or candidate species for scientific, educational, or management purposes and for take incidental to otherwise lawful activities. Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

o *Federal Endangered Species Act*

The Federal Endangered Species Act of 1973 provides definitions for endangered species and threatened species of the U.S. Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to "take" any listed species. "Take" is defined in Section 3(18) of FESA: "...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the USFWS, through regulation, has interpreted the terms "harm" and "harass" to include certain types of habitat modification that result in injury to, or death of species as forms of "take." These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action that could affect a federally listed plant and animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants.

o *State and Federal Take Authorizations for Listed Species*

Federal or state authorizations of impacts to or incidental take of a listed species by a private individual or other private entity would be granted in one of the following ways:

- Section 7 of the FESA stipulates that any federal action that may affect a species listed as threatened or endangered requires a formal consultation with USFWS to ensure that the action is not likely to jeopardize the continued existence of the listed species or result in destruction or adverse modification of designated critical habitat. 16 U.S.C. 1536(a)(2).

- In 1982, the FESA was amended to give private landowners the ability to develop Habitat Conservation Plans (HCPs) pursuant to Section 10(a) of the FESA. Upon development of an HCP, the USFWS can issue incidental take permits for listed species where the HCP specifies at minimum, the following: (1) the level of impact that will result from the taking, (2) steps that will minimize and mitigate the impacts, (3) funding necessary to implement the plan, (4) alternative actions to the taking considered by the applicant and the reasons why such alternatives were not chosen, and (5) such other measures that the Secretary of the Interior may require as being necessary or appropriate for the plan.

- Sections 2090-2097 of the California Endangered Species Act (CESA) require that the state lead agency consult with CDFG on projects with potential impacts on state-listed species. These provisions also require CDFG to coordinate consultations with USFWS for actions involving federally listed as well as state-listed species. In certain circumstances, Section 2080.1 of the California Fish and Game Code allows CDFG to adopt the federal incidental take statement or the 10(a) permit as its own based on its findings that the federal permit adequately protects the species under state law.

o *Take Authorizations Pursuant to the MSHCP*

The Western Riverside County MSHCP, a regional HCP, was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the USFWS, CDFG, and participating entities. The intent of the MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. As such, the MSHCP is intended to streamline review of individual projects with respect to the species and habitats addressed in the MSHCP, and to provide for an overall Conservation Area that would be of greater benefit to biological resources than would result from a piecemeal regulatory approach. The MSHCP provides coverage (including take authorization for listed species) for special-status plant and animal species, as well as mitigation for impacts to sensitive species.

Through agreements with the USFWS and the CDFG, the MSHCP designates 146 special-status animal and plant species that receive some level of coverage under the plan. Of the 146 "Covered Species" designated under the MSHCP, the majority of these species have no additional survey/conservation requirements. In addition, through participation with the MSHCP, the MSHCP provides mitigation for project-specific impacts to Covered Species so that the impacts would be reduced to below a level of significance pursuant to CEQA. As noted above, project-specific survey requirements exist for species designated as "Covered Species not yet adequately conserved" (Volume I, Section 6.1.2 of the MSHCP document). As the MSHCP's survey requirements relate to the Project site, surveys are required on the Project site for the western burrowing owl and for narrow endemic plants.

4.5.2 BASIS FOR DETERMINING SIGNIFICANCE

Environmental impacts to biological resources are assessed using impact significance threshold criteria, which reflect the policy statement contained in CEQA, §21001(c) of the California Public Resources Code. Accordingly, the State Legislature has established it to be the policy of the State of California to:

> *"Prevent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities..."*

In the development of thresholds of significance for impacts to biological resources, CEQA provides guidance primarily in §15065, Mandatory Findings of Significance, and the CEQA Guidelines, Appendix G, Environmental Checklist Form. CEQA Guidelines §15065(a) states that a project may have a significant effect where:

> *"The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or wildlife community, reduce the number or restrict the range of an endangered, rare, or threatened species, ..."*

Therefore, for the purpose of analysis in this EIR, the proposed Project would result in a significant impact to biological resources if the Project or any Project-related component would:

1. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U. S. Fish and Wildlife Service;*

2. *Have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U. S. Wildlife Service;*

3. *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;*

4. *Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites;*

5. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or*

6. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan.*

4.5.3 IMPACT ANALYSIS

Threshold 1:	***Would the proposed Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?***

A. Vegetation Communities

Approximately 9.0 acres of the Project site consists of developed/ disturbed lands and approximately 8.3 acres is developed as a trailer parking yard. Neither portion of the Project site contains sensitive vegetation communities. The trailer parking yard has been built upon and the remaining vacant lot contains no native vegetation community and is fully disturbed (URS Corporation, 2012a). Therefore, the Project will have no impact on sensitive vegetation communities.

B. Plant Species

The Project site contains one species of special status plant species, smooth tarplant. The smooth tarplant is a CNPS List 1B.1 species; however, due to the developed and disturbed nature of surrounding properties and a small number of individual plants (two) located on the Project site, URS determined that the species is unlikely to grow larger in population. The Project will have a less than significant impact on the plant species because the loss of these two individuals will not significantly impact the persistence of the species.

C. Wildlife

One special status species was observed on the Project site during biological field surveys, the California horned lark. Impacts to the species would be less than significant because the California horned lark is a MSHCP covered species. An Implementation Agreement (IA) between the USFWS, the CDFW, and participating government bodies including the City of Moreno Valley was executed and associated 10(a)(1)(B) Permit No. TE-088609 was issued on June 22, 2004. For properties such as the Project site that are outside of the MSCHP Criteria Area, impacts to plant and animal species identified in the MSHCP as "Covered Species Adequately Conserved" are authorized by Permit No. TE-088609. The Project will be required to pay the City of Moreno Valley's MSHCP Mitigation Fee, which supplements the financing and acquisition of lands supporting species covered by the MSHCP and to pay for new development's share of this cost.

Additionally, although the species was not observed, the Project site supports habitat for the western burrowing owl. No burrowing owls or their signs were found on the Project site or within a 500-foot buffer around the Project site, but because the property contains suitable habitat for the western burrowing owl, it is possible the species could migrate onto the property prior to construction, resulting in a potentially significant impact. The conduct of a pre-construction survey for the western burrowing owl is required and mitigation will be necessary if the species is found to be present.

Threshold 2: Would the proposed Project have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U. S. Wildlife Service?

As documented in the Biological Technical Report completed by URS, the Project site contains no drainages or vegetation that meets the definition of riparian or other sensitive habitats as defined by the CDFW or USFWS. The Project site lacks evidence of riparian or riverine habitats and also does not contain vernal pools. Therefore, the proposed Project has no potential to cause an adverse effect or impact on any riparian habit or other sensitive natural community.

Threshold 3: Would the proposed Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The Project site contains no federal wetlands; therefore, there would be no impact on federally protected wetlands as defined by the Clean Water Act.

Threshold 4: Would the proposed Project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The 17.3-acre Project site contains a trailer parking yard on the southern 8.3 acres while the northern 9.0 acres consists of developed/disturbed vacant land. There are no water bodies on or adjacent to the site that could support fish; therefore, there is no potential for the Project to interfere with the movement of fish. There are also no native wildlife nurseries on or adjacent to the site; therefore, there is no potential for the Project to impede the use of a native wildlife nursery site.

The property is surrounded by paved roads and developed parcels or parcels planned for development. The surrounding area contains a mixture of industrial warehouses, an automobile junk yard, truck trailer parking lot, undeveloped land and a small number of non-conforming residences. The paved roadways and surrounding land uses impede wildlife movement across the Project site and throughout the Project site's vicinity. Thus, implementation of the Project would not have the ability to interfere with an established migratory wildlife corridor, because the site does not serve as a corridor nor is it connected to an established corridor. Additionally, the Project site is not located adjacent to the Western Riverside County MSHCP Criteria Area or any MSHCP Preserve; thus, the Project has no potential to result in wildlife movement impacts on the MSHCP Preserve.

Threshold 5: Would the proposed Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Project would not result in any significant conflicts with local policies related to the protection of biological resources because no local policies are applicable except for the MSHCP. The proposed Project is required to comply with the mandatory payment of MSHCP fees pursuant to Title 3, Chapter 3.48 of the City's Municipal Code. Although the City of Moreno Valley's Landscape Ordinance requires that "all mature trees on a site with 4" calipers or greater in place shall be

retained and preserved," the proposed Project would not conflict with the Landscape Ordinance requirements because no such trees exist on the site, except for ornamental trees in the roadway frontage streetscapes that would be retained. The City of Moreno Valley does not have any additional ordinances in place protecting biological resources. Therefore, no impact would occur.

Threshold 6: Would the proposed Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan?

The following is an analysis of the proposed Project's compliance with the Western Riverside County MSHCP's Reserve Assembly Requirements as well as other applicable MSHCP requirements pursuant to the following sections of the MSHCP: Section 6.1.3, Protection of Narrow Endemic Plant Species; Section 6.1.4, Guidelines Pertaining to the Urban/Wildland Interface; and Section 6.3.2, Additional Survey Needs and Procedures.

❑ Project Relation to Reserve Assembly

The Project site occurs within the overall Plan Area of the MSHCP, and as such the Project is required to abide by any applicable survey and/or conservation requirements. As indicated in the discussion below, all surveys required by the MSHCP have been conducted on the proposed Project site and in the BSA buffer area. The Project site does not occur within the MSHCP Criteria Area. As such, the Project is not required to set aside conservation lands pursuant to the MSHCP, and the Project is not subject to the Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process, or Joint Project Review (JPR). Accordingly, the proposed Project would not conflict with the MSHCP Reserve Assembly requirements (URS Corporation, 2012a).

❑ Protection of Narrow Endemic Plants

Section 6.1.3 of the MSHCP requires that within the Narrow Endemic Plant Species Survey Area (NEPSSA), site-specific focused surveys for Narrow Endemic Plant Species will be required for all public and private projects where appropriate soils and habitat are present. The Project site and 500 foot buffer are located within NEPSSA 3A; therefore, focused surveys are required for Narrow Endemic Plants on the Project site. After a thorough habitat assessment, a focused survey for smooth tarplant conducted by URS biologists determined that two plants are present. Impacts due to the removal of these two individuals are less than significant because the loss of these two individuals will not significantly impact the persistence of the species. Accordingly, the proposed Project would not conflict with Volume I, Section 6.1.3 of the MSHCP.

❑ Guidelines Pertaining to the Urban/Wildland Interface

The MSHCP Urban/Wildland Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. As the MSHCP Conservation Area is assembled, development is expected to occur adjacent to the Conservation Area and edge effects with the potential to adversely affect biological resources within the Conservation Area are required to be evaluated. Edge effects are identified in the MSCHP as: Drainage; Toxics; Lighting; Noise; Invasive Species; Barriers; and Grading/Land Development. The Project site does not occur within or adjacent to the MSCHP Criteria Area or existing Conservation Area, or any Public/Quasi-Public lands. As such, the proposed Project would not have the potential to create

indirect effects on the MSHCP Conservation Area and is not be subject to the Urban/Wildland Interface Guidelines (URS Corporation, 2012a). The Project, therefore, is consistent with Section 6.1.4 of the MSHCP.

❑ Additional Survey Needs and Procedures

MSHCP Section 6.3.2 identifies that in addition to the Narrow Endemic Plant Species addressed in Section 6.1.3, additional surveys may be needed for other certain plant and animal species in conjunction with MSHCP implementation in order to achieve full coverage for these species. Within areas of suitable habitat, focused surveys are required for additional plant species if a project site occurs within a designated CAPSSA, or special animal species survey area (i.e., burrowing owl, amphibians, and mammals). Of these, the Project site only occurs within the MSHCP burrowing owl survey area (URS Corporation, 2012a).

As discussed above under the analysis of Threshold 1, a focused survey for the western burrowing owl was completed in accordance with the MSHCP Burrowing Owl Survey Area requirements. The survey determined that no western burrowing owls or diagnostic sign of western burrowing owls (whitewash, pellets, feathers, small mammal bones, etc.) are located within the Project site or within a 500 foot buffer area around the site; therefore, no impact to an observed special-status species would occur. However, the species is migratory and therefore could migrate onto the undeveloped portion of the property prior to ground-disturbing construction activities. The conduct of a pre-construction survey for the species will be required and mitigation will be necessary if the species is found to be present.

4.5.4 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects in the vicinity of the Project site and resulting from full General Plan buildout in the City of Moreno Valley and other jurisdictions in the region within the boundaries of the Western Riverside County MSHCP.

Implementation of the proposed Project would result in permanent ground disturbance and development on the 9.0 acres of the Project site that is not already developed. The primary effects of the proposed Project, when considered with the build out of long range plans in the region, would be the cumulative loss of vacant land that can support habitat for sensitive species. With respect to special-status species, although habitat offered on the Project site (disturbed/developed vegetation) is of substantially lesser quality than habitat that is found in undisturbed natural areas, it still provides open spaces for foraging, refuge, nesting, and areas that can be used for species reproduction.

Anticipated cumulative impacts are addressed within the region by the Western Riverside County MSHCP and the adopted “The Habitat Conservation Plan for the Stephens’ Kangaroo Rat in Western Riverside County, California”. The MSHCP, as currently adopted, addresses 146 “Covered Species” that represent a broad range of habitats and geographical areas within Western Riverside County, including threatened and endangered species and regionally- or locally-sensitive species that have specific habitat requirements and conservation and management needs. The MSHCP addresses biological impacts for take of Covered Species within the MSHCP area. Impacts to Covered Species and establishment and implementation of a regional conservation strategy and other measures

included in the MSHCP are intended to address the federal, state, and local mitigation requirements for these species and their habitats. Specifically, Section 4.4 of the MSHCP states that:

> *The MSHCP was specifically designed to cover a large geographical area so that it would protect numerous endangered species and habitats throughout the region. It is the projected cumulative effect of future development that has required the preparation and implementation of the MSHCP to protect multiple habitats and multiple endangered species.*

It goes on to state that:

> *The LDMF [Local Development Mitigation Fee] is to be charged throughout the Plan Area to all future development within the western part of the County and the Cities in order to provide a coordinated conservation area and implementation program that will facilitate the preservation of biological diversity, as well as maintain the region's quality of life.*

The reason for the imposition of the Mitigation Fee over the entire region is that the loss of habitat for endangered species is a regional problem resulting from the cumulative impacts of continuing development throughout all of the jurisdictions in Western Riverside County. Finally, Section 5.1 of the MSHCP states that:

> *It is anticipated that new development in the Plan Area will fund not only the mitigation of the impacts associated with its proportionate share of regional development, but also the impacts associated with the future development of more than 332,000 residential units and commercial and industrial development projected to be built in the Plan Area over the next 25 years.*

As the construction of buildings, infrastructure, and all alterations of the land within areas that are outside of the Criteria Area are permitted under the MSHCP (see MSHCP Section 2.3.7.1), cumulative impacts to biological resources with the exception of MSHCP non-covered species would be less than significant provided that the terms of the MSHCP are fully implemented (MSHCP Final EIR/EIS, Section 4.4.1.6). The MSHCP database has been consulted for the proposed Project and the recommended focused surveys (for the western burrowing owl and narrow endemic plant species) have been conducted. The Project is required to pay the required MSHCP mitigation fees per the City of Moreno Valley Municipal Code Title 3, Chapter 3.48. The Project would comply with the requirements of the MSHCP and, thus, would not conflict with its adopted policies. Accordingly, because the Project complies with the MSHCP, would pay the required MSHCP mitigation fee, and would have less than significant impacts to MSHCP non-covered species, the proposed Project's contribution to cumulative impacts would be less than significant.

As indicated under the discussion and analysis of Threshold 1 in Subsection 4.3.3, the Project site does not contain any habitat for any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. Accordingly, the Project would not result in any cumulatively significant impacts to sensitive species as a result of habitat loss.

Although the Project would impact one special status plant (smooth tarplant), the Project site does not occur within the MSHCP's Criteria Area, indicating that the species is not targeted for conservation in the Project area and would be conserved instead as part of the assemblage of the MSHCP Reserve System. Since the proposed Project and all other developments within the

cumulative study area would be required to comply with the MSHCP, Project impacts to special-status plants are evaluated as less than significant on a cumulative basis.

Regarding special-status animals, the Project would eliminate actual or potential live-in habitat for the burrowing owl and the California horned lark. As the proposed Project and other cumulative developments would be required to comply with the MSHCP, potential Project-related impacts to California horned lark are concluded to be less than significant on a cumulative basis because adequate habitat for the species would be accommodated through the MSHCP Reserve System. The burrowing owl is fairly ubiquitous within the Project vicinity; as such, it is reasonable to conclude that impacts to habitat for this species are occurring throughout the cumulative study area. As such, prior to mitigation, the proposed Project's potential impacts to burrowing owls are concluded to be cumulatively significant and mitigation would be required.

The Project site does not contain habitat of wetlands or riparian areas. Therefore, the Project would not impact any wetlands or riparian areas; thus, the Project does not have the potential to contribute to cumulatively significant wetland and riparian impacts.

As indicated under the discussion and analysis of Threshold 4 in Subsection 4.5.3, the proposed Project would not significantly impact wildlife movement corridors because such corridors already are accommodated by the MSHCP and the Project site is not targeted for conservation as part of any proposed or existing linkages by the MSHCP. In addition, there are no native wildlife nursery sites within the Project vicinity. While Western Riverside County is becoming increasingly urbanized, which could restrict wildlife movement, the MSHCP, and the Conservation Areas established therein, was developed with several goals that specifically support wildlife movement. Accordingly, cumulative impacts to wildlife movement are less than significant. As concluded by the MSHCP's Final EIR/EIS, *"The MSHCP provides for the movement of native resident and migratory species and for genetic flow identified for Covered Species. Therefore, impacts related to cores and linkages resulting from the Plan are considered less than significant."* (MSHCP Final EIR/EIS, Section 4.1.5) Accordingly, the proposed Project would not result in any cumulatively significant impacts to wildlife movement corridors or native wildlife nursery sites.

The proposed Project would not conflict with any local policies or ordinances protecting biological resources; accordingly, a cumulatively significant impact due to a conflict with such local policies or ordinances would not occur.

As discussed under the analysis of Threshold 6 in Subsection 4.5.3, the proposed Project would be fully consistent with the all applicable MSHCP requirements. As such, cumulative impacts due to a conflict with these the MSHCP would not occur.

4.5.5 APPLICABLE PROJECT REQUIREMENTS

The following is a list of requirements and/or conditions to which the Project would be required to adhere. Compliance with these measures was assumed throughout the above analysis of impacts to biological resources.

PR 4.5-1 The Project shall comply with City of Moreno Valley Municipal Code Title 3, Chapter 3.48, Western Riverside County Multiple Species Habitat Conservation Plan

Fee Program, which requires a per-acre local development mitigation fee that will assist in providing revenue to acquire and preserve vegetation communities and natural areas within the city and western Riverside County which are known to support threatened, endangered or key sensitive populations of plant and wildlife species.

PR 4.5-2 The Project shall comply with City of Moreno Valley Municipal Code Title 3, Chapter 8.60, Threatened and Endangered Species, which requires a per-acre local development mitigation fee pursuant to the City's adopted "The Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County, California" and as established pursuant to Fee Resolution 89-92.

4.5.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold 1: Significant Direct and Cumulative Impact. No sensitive vegetation communities are located on the Project site. A less than significant impact on sensitive plant species would occur because the loss of two individual smooth tarplant would not significantly impact the persistence of the species. The loss of habitat for the California horned lark is less than significant with mandatory MSHCP compliance because the species is a MSHCP Covered Species. Although the western burrowing owl is not present on the Project site, the species could be impacted if it migrates onto the property prior to the commencement of ground-disturbing construction activities, which is a potentially significant direct and cumulative impact.

Threshold 2: No Impact. The Project site lacks riparian and other sensitive habitats; therefore, the Project would have no impact on riparian or other sensitive habitats as defined by the CDFW or USFWS.

Threshold 3: No Impact. No federally protected wetlands are located on the Project site; therefore, no impact would occur.

Threshold 4: No Impact. There is no potential for the Project to interfere with the movement of fish or impede the use of a native wildlife nursery site. Additionally, the Project would not have the ability to interfere with an established migratory wildlife corridor or result in wildlife movement impacts on the MSHCP Preserve.

Threshold 5: No Impact. The Project would not conflict with any local policies or ordinances governing biological resources.

Threshold 6: Significant Direct and Cumulative Impact. The Project site is subject to the Western Riverside County MSHCP and its survey requirements for the western burrowing owl. Although compliant with all MSHCP provisions, and although the species is absent on the property, the property contains suitable habitat for the western burrowing owl. If the species is present on the property at the time a grading permit is issued, impacts would be significant, requiring mitigation.

4.5.7 MITIGATION

MM 4.5-1 Within 30 days prior to grading, a qualified biologist shall conduct a survey of the undeveloped portions of the property and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report and shall be submitted, reviewed, and accepted by the Planning Division prior to the issuance of a grading permit and subject to the following provisions:

a. In the event that the pre-construction survey identifies no burrowing owls on the property, a grading permit may be issued without restriction.

b. In the event that the pre-construction survey identifies the presence of at least one individual but less than three (3) mating pairs of burrowing owl, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.

c. In the event that the pre-construction survey identifies the presence of three (3) or more mating pairs of burrowing owl, the requirements of MSCHP Species-Specific Conservation Objectives 5 for the burrowing owl shall be followed. Objective 5 states that if the site (including adjacent areas) supports three (3) or more pairs of burrowing owls and supports greater than 35 acres of suitable Habitat, at least 90 percent of the area with long-term conservation value and burrowing owl pairs will be conserved onsite until it is demonstrated that Objectives 1-4 have been met. A grading permit shall only be issued, either:

- upon approval and implementation of a property-specific Determination of Biologically Superior Preservation (DBESP) report for the western burrowing owl by the CDFW.

- a determination by the biologist that the site is part of an area supporting less than 35 acres of suitable Habitat, and upon passive or active relocation of the species following accepted CDFW protocols. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist,

active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been

- relocated prior to the issuance of a grading permit.

MM 4.5-2 If clearing activities are proposed between February 1 and August 31, then within 30 days prior to vegetation clearing activities a qualified biologist shall conduct nesting bird surveys. If any nesting bird species are identified, then a construction buffer distance of 300 feet for non-listed, non-raptor species or 500 feet for listed and raptor species shall be maintained until the Project biologist certifies that the nests are no longer occupied.

4.5.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

With implementation of Mitigation Measure 4.5-1, potential impacts to the western burrowing owl and nesting birds would be reduced to below a level of significance.

5.0 MANDATORY CEQA TOPICS

5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

The CEQA Guidelines require that an EIR disclose the significant environmental effects of a project which cannot be avoided if the proposed project is implemented (CEQA Guidelines §15126(b)). As described in detail in Section 4.0 of this EIR, the proposed Project would result in three (3) impacts to the environment that cannot be reduced to below a level of significance after implementation of relevant standard conditions of approval, compliance with applicable regulations, and application of feasible mitigation measures. The significant impacts that cannot be mitigated to a level below significant consist of the following:

- Air Quality (Long-Term): Significant direct and cumulative long-term air quality impact due to an exceedance of the SCAQMD regional threshold for NO_X emissions, which also would cumulatively contribute to an existing air quality violation within the SCAB (i.e., non-attainment status for ozone) because NO_X emissions are a precursor for ozone.

The proposed Project's unavoidable air quality impact listed above cannot be reduced to below a level of significance after implementation of the mitigation measures identified in this EIR. Additional feasible mitigation measures are not available to reduce the impact because operational emissions of NOx primarily come from mobile source emissions that are beyond the control of the Project Applicant, future Project tenants, and the City of Moreno Valley.

- Noise (Near-Term): Significant direct and cumulative near-term noise impact to due to the generation of noise levels during Project construction that exceed the City of Moreno Valley's Noise Ordinance standard of 65 dBA Leq at a distance of 200 feet from the property line.

In order to mitigate construction-related noise impacts to below a level of significance, all construction activities would need to be set back from the property line by a distance ranging from 565 feet (during architectural coating) to 2,774 feet (during site grading activities). It is not feasible to build the Project while restricting construction activities to those distances. Additionally, there are no feasible alternatives to using noise-generating equipment to construct the proposed Project. Accordingly, there are no feasible mitigation measures available to reduce the Project's near-term construction -related noise impacts to a level below significant.

- Transportation/Traffic (Near-Term): Significant cumulative near-term impact to the intersections of Western Way/Harley Knox Boulevard and Indian Street/ Harley Knox Boulevard.

Under Horizon Year Cumulative (2017) Conditions, the proposed Project would contribute 50 or more peak hour trips to the intersections of Western Way at Harley Knox Boulevard and Indian Street at Harley Knox Boulevard in the City of Perris, which would operate at deficient levels of service. Although these intersections and Harley Knox Boulevard are programmed for improvement

under the North Perris RBBD, the Project site lies outside of the RBBD fee area and the Project Applicant is not subject to fair-share fee payments. Because the City of Moreno Valley has no authorization over City of Perris intersections to ensure that the improvements will be in place prior to the Project's Horizon Year Cumulative (2017) condition, the Project's impact is considered to be cumulatively considerable and unavoidable.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

The CEQA Guidelines require EIRs to address any significant irreversible environmental changes which would be involved in the proposed action should it be implemented (CEQA Guidelines § 15126.2(c)). An environmental change would fall into this category if: a) the project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources are not justified (e.g., the project results in the wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources in the form of construction materials and energy resources would be used in the construction of the proposed Project, but development of the Project would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels). Construction and operation of the proposed Project would not involve the use of large sums or sources of non-renewable energy.

Implementation of the proposed Project would result in the commitment of future generations to one warehouse building on the proposed Project site. Surrounding the Project site, several large-scale industrial and warehouse buildings have been developed and there are several approved development projects in this area that are pending construction. Immediately abutting the proposed Project site on the west is property containing a warehouse building occupied by Harbor Freight Tools, beyond which is a warehouse distribution facility currently occupied by Modular Metal Fabrications, Inc. Property located north of the site is designated for future industrial development, but currently consists of undeveloped land, several existing non-conforming single-family residences, and an automobile junk yard. Beyond those uses is another large warehouse distribution facility currently occupied by O'Reilly Auto Parts. Land immediately east of the Project site includes undeveloped land and two existing warehouse distribution facilities currently occupied by El Dorado Stone and Walgreens. To the south of the proposed Project site are disturbed lands used for truck trailer parking and one non-conforming single-family residence, south of which is a warehouse distribution facility currently occupied by Harman Distribution Center.

As demonstrated in the analysis presented throughout EIR Section 4.0, long-term operation of the proposed Project would not result in significant physical environmental effects to nearby properties. Although the Project would cause unavoidable impacts associated with air quality (long-term), noise (near-term), and traffic (near-term) as summarized above in Subsection 5.1, these effects would not

commit surrounding properties to land uses other than the uses currently by the Moreno Valley General Plan and/or the Moreno Valley Industrial Area Plan.

EIR Subsection 5.4.5 provides an analysis of the proposed Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage to the environment. As concluded in the analysis, the proposed Project would be required to comply with federal, state, and local regulations related to hazardous materials, which would ensure that construction and long-term operation of the proposed Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

To reduce the Project's energy needs and fossil fuel consumption, and thereby reduce air emissions, the City of Moreno Valley will apply Conditions of Approval to the Project to ensure mandatory compliance with applicable regulatory requirements imposed by the State of California and the SCAQMD (as summarized in EIR Subsections 4.1 and 4.2, which would reduce the Project's level of demand for energy resources. Therefore, the proposed Project would not result in the wasteful use of energy or the consumption of resources that are not justified based on the scale of the proposed Project.

5.3 GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

CEQA requires a discussion of the ways in which the proposed Project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines §15126.2(d)). New employees and new residential populations represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

Western Riverside County abuts San Bernardino County to the northeast, Orange County to the west and San Diego County to the south. These adjacent counties have large employment bases and given Riverside County's close proximity to these adjacent counties, many Riverside County residents commute to jobs in adjacent counties. The California Employment Development Department (CEDD) reported that 173,379 workers were commuting out of Riverside County in 2000 (CEDD, 2008)[1].

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environs where population growth results in increased demand for service and commodity markets responding to the new population. Economic growth would likely take place as a result of the proposed Project's operation as warehouse building, but the intensity of economic growth would occur consistent with planned growth identified in the Moreno Valley General Plan and in the General Plans of adjacent jurisdictions. The Project is consistent with the Business Park/Light Industrial land use designation

[1] As of November 2012, the California Employment Development Department had not yet released County-to-County commuter data based on the 2010 Census.

assigned to the property by the City of Moreno Valley General Plan and the Moreno Valley Industrial Area Plan (MVIAP).

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as the Southern California Association of Governments (SCAG). Significant growth impacts also could occur if the project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

Development of the Project with one warehouse building may place development pressure on several surrounding parcels designated for industrial development and that are currently undeveloped. However, these surrounding properties already are planned for development by the MVIAP and implementation of the proposed Project would not directly promote growth on these adjacent and surrounding properties. Because development of nearby parcels would be consistent with the City's General Plan and the MVIAP, growth-inducing impacts of the Project would be less than significant. The Project is not expected to induce growth or land use changes on other parcels in the vicinity, as other lands surrounding the site are either already developed or planned to be developed consistent with their General Plan and/or MVIAP land use designations.

Projected growth quantifications for the Project are most meaningful for the geographic area covered by the Western Riverside County Council of Governments (WRCOG). This area includes the cities of Calimesa, Canyon Lake, Corona, Hemet, Lake Elsinore, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto, and Temecula, as well as portions of unincorporated Riverside County (including the new city of Menifee which was not yet incorporated at the time SCAG forecasts were published). SCAG's most recently adopted Integrated Growth Forecast (SCAG, 2008) for the WRCOG area is reflected below in Table 5-1, *SCAG Growth Forecasts for the WRCOG Region*. The proposed Project is consistent with those forecasts, in that the forecasts considered City General Plan buildout.

"Jobs-to-housing ratio" measures the extent to which job opportunities in a given geographic area are sufficient to meet the employment needs of area residents. However, as noted in the City's General Plan, "The land use plan allows for an adequate number of jobs to meet the needs of local residents" (Moreno Valley 2006a, p. 2-6). The proposed Project is consistent with the General Plan's land use designation for the site; therefore, the proposed Project would assist the City in improving the jobs-housing ratio, which under existing conditions is lower than the statewide and regional average (indicating the City of Moreno Valley and surrounding areas experience a relatively low jobs-to-housing ratio).

Table 5-1 SCAG Growth Forecasts for the WRCOG Region

CATEGORY	YEAR 2010	YEAR 2015	YEAR 2020	YEAR 2025	YEAR 2030	YEAR 2035
Population	1,735,426	1,918,962	2,096,544	2,262,992	2,414,256	2,550,867
Households	546,047	609,219	671,933	727,622	780,743	828,547
Employment	588,523	691,260	797,626	901,163	1,005,923	1,098,233

Source: SCAG, Regional Transportation Plan (RTP), 2008.

The northern half of the Project site (approximately 8.9 acres) is undeveloped and the southern half of the site (approximately 8.4 acres) is developed as a parking lot that is used for truck trailer parking, Lands immediately surrounding the Project site include undeveloped lands, warehouse buildings, and other land uses located on properties designated and zoned for industrial development by the City of Moreno Valley. Development in the area is occurring in accordance with the City of Moreno Valley General Plan and MVIAP. Implementation of the proposed Project would not stimulate growth in the area beyond that anticipated by the City of Moreno Valley General Plan.

Indirect growth-inducing impacts at the local level result from a demand for additional goods and services associated with the increase in people in the area, including employees. This occurs in suburban or rural environments where population growth results in increased demand for service and commodity markets responding to the new population. This type of growth is, however, a regional phenomenon resulting from introduction of a major employment center or regionally significant housing project. The implementation of the proposed Project would result in growth-inducing impacts of the region, but not beyond that which is already envisioned by the General Plan.

5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE INITIAL STUDY PROCESS

CEQA Guidelines §15128 requires that an EIR:

> *"…contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."*

An Initial Study was prepared for the proposed Project, which is included as *Technical Appendix A* to this EIR. Through the Initial Study process, the City of Moreno Valley determined that the proposed Project would not have the potential to cause significant adverse impacts to 13 environmental subject areas, including: aesthetics, agricultural resources, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality, land use/planning, mineral resources, population and housing, public services, recreation, and utilities/service systems. Therefore, these issue areas are not required to be analyzed in detail in Section 4.0, Environmental Analysis, of this EIR. A brief summary of issues found not to be significant is presented below. For information on the Project's background, refer to EIR Subsection 1.3, Project History, which summarizes the results of prior CEQA documentation prepared for the Project site.

5.4.1 AESTHETICS

The Project site is located in the City of Moreno Valley, which lies within a relatively flat valley floor surrounded by rugged hills and mountains. Scenic vistas within Moreno Valley are defined by the Box Springs Mountains and Reche Canyon area to the north, the "Badlands" to the east, and Mount Russell to the south. According to General Plan Figure 7-2, *Major Scenic Resources*, the Project site, which is located in the southwestern portion of the City, is not in close proximity to these major scenic resources and is not located within an identified view corridor or along an identified scenic route (City of Moreno Valley 2006a). Therefore, although the proposed Project would change the current aesthetics of the property from a parking lot and undeveloped lot to a developed logistic center, that aesthetic change would have a less than significant impact on a scenic vista.

The Project site is not located within or adjacent to a scenic highway corridor and does not contain trees, rock outcroppings, or historic buildings (City of Moreno Valley 2006a, pp. 7-13). Furthermore, there are no State-designated or eligible scenic highways within the City of Moreno Valley. The Project site is located approximately 6.0 miles north of Highway 74, which is the only facility within the Project vicinity that is designated as a State-eligible scenic highway. The Project's proposed development features (one building, parking lots, truck yards, landscaping, etc.) would not be discernable from Highway 74 due to intervening development and distance. Accordingly, no impact would occur.

Implementation of the proposed Project would result in the visual conversion of the site from an undeveloped lot and truck trailer parking lot to that of a developed site containing one warehouse building. The visual character of the site's surroundings is dominated by warehouse buildings and undeveloped properties designated for future industrial development. Implementation of the proposed Project would implement the City's General Plan and MVIAP as applicable to the property and would not substantially degrade the visual character or quality of the site or the site's surroundings. The visual character of the site would change, but the change would not be degrading to the existing visual character or quality of the property or its surroundings, resulting in a less than significant impact.

Exterior lighting proposed by the Project would be required to comply with City lighting requirements and the design standards of the MVIAP, which address light and glare. Compliance with City Municipal Code requirements and the MVIAP, demonstration of which would be required prior to City issuance of a building permit, would ensure that no operation, activity, sign, or light fixture proposed by the Project would produce substantial amounts of light or glare that would adversely affect the day or nighttime views of adjacent properties (City of Moreno Valley n.d., City of Moreno Valley 2002, p. III-19). With respect to potential daytime glare impacts, the proposed Project would involve the construction and operation of one building with exterior building surfaces that consist of tilt-up concrete construction and windows with reflective glazing. While glazing has a potential to result in glare effects, such effects would not adversely affect the daytime views of any surrounding properties, including motorists on adjacent roadways because the site would be surrounded along roadway perimeters with screen walls and landscaping. Accordingly, impacts to day or nighttime views in the area would be less than significant.

For the reasons stated above, the proposed Project would result in less than significant impacts to aesthetics.

5.4.2 AGRICULTURAL RESOURCES

The Project site is not used for agriculture. It contains lands classified as "Farmland of Local Importance" by the Farmland Mapping and Monitoring Program (FMMP) and does not contain any soils mapped by the State Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (City of Moreno Valley 2006b 5.8-3). There are no General Plan policies requiring conservation of Farmland of Local Importance (City of Moreno Valley 2006a, p. 5.8-3). As such, a less than significant impact due to the conversion of important farmland types would occur with implementation of the Project.

The Project site is not within an agricultural preserve, nor is it subject to a Williamson Act contract. Under existing conditions, the Project site is comprised of a parking lot and vacant, undeveloped land. Lands surrounding the proposed Project site are not used for agricultural production and include undeveloped lands, non-conforming single family residential uses, warehouse distribution land uses, and industrial support areas (i.e., truck trailer parking). The Project site is zoned for industrial and industrial-support land uses and the immediate surrounding area is similarly zoned. Because the Project site is not located in or adjacent to an agricultural preserve and neither the Project site nor any immediately surrounding property is zoned for agricultural use, the proposed Project would not conflict with an existing agricultural use, zoning, or a Williamson Act contract.

For the reasons stated above, the proposed Project would result in less than significant impacts to agricultural resources.

5.4.3 CULTURAL RESOURCES

The Project site contains no structures or sites of historic significance. Because no historic resources exist on the property, no impact would occur. Furthermore, the Project site was not identified as a historic resource as part of the historic resource inventory that was conducted as part of the City of Moreno Valley General Plan FEIR (City of Moreno Valley 2006b, p. 5.10-3). Therefore, implementation of the proposed Project has no potential to result in a substantial adverse change to any designated historic resource, because no such resources exist on the Project site.

URS Corporation conducted a cultural resources inventory of the undeveloped portion of the proposed Project site in 2012 that included a records search at the Eastern Information Center at the University of California, Riverside and a pedestrian survey of the site. According to the archival research, no known cultural resources had been previously identified within the Project site, and no archaeological resources have previously been identified within the ½ mile of the Project site (URS Corporation 2012d, pp. 4-1 to 4-2). No archaeological resources were discovered on-site during the pedestrian survey (URS Corporation 2012d, p. 5-1). Additionally, the 2008 MND and its Addenda Nos. 1 and 2 prepared to evaluate the development of an interim parking lot on the property indicated that the potential for uncovering resources is low. No resources were recovered during site preparation activities during construction of the existing parking lot. As such, no known significant archaeological resources are present on the property.

Nonetheless, during site excavation and/or grading activities that occur during Project construction activities, there is a potential, however unlikely, to uncover archaeological resources that may be buried beneath the surface of the site if ground disturbance extends into previously undisturbed soils. Conditions of Approval would be imposed on the Project that would require any suspected archaeological resources discovered during ground-disturbing activities to be evaluated by a qualified archaeologist. Ground-disturbing activities would be required to cease within the immediate vicinity of any suspected archaeological resources until the qualified archaeologist determines the significance of the suspected archaeological resource and protective measures are implemented as recommended by the qualified archaeologist. Mandatory compliance with the Conditions of Approval would ensure that potential impacts to previously undiscovered archaeological resources would be less than significant.

During archaeological field investigations of the Project site, no evidence of human remains, including those interred outside of formal cemeteries, were observed (URS Corporation 2012d, p. 5-1). Additionally, no human remains were uncovered during construction of the parking lot in the southern portion of the Project site. Nevertheless, the potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction. In the event that human remains are discovered during Project grading or other ground disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq. Mandatory compliance with these provisions of California state law would ensure that impacts to human remains, if unearthed during construction activities, would be appropriately treated and ensure that potential impacts are less than significant.

The Project site does not contain any known unique geologic features. In addition, the proposed Project site is identified by the City's General Plan FEIR as having a "low" potential to contain unique paleontological resources (City of Moreno Valley 2006b, pp. 5.10-11). The 2008 MND prepared for the southern portion of the Project site that is now a parking lot also identified no potential to impact a paleontological resource or unique geologic feature. No paleontological resources were encountered during construction activities for the existing on-site parking lot. Depth of grading for the proposed Project would be approximately five feet or less, which also substantially limits the potential for subsurface resource discovery. For these reasons, the proposed Project has no potential to destroy unique paleontological resources or geologic features.

For the reasons stated above, the proposed Project would result in less than significant impacts to cultural resources. The following Project Requirement is carried forward as a Condition of Approval from the previously-approved project (P12-061):

"P12: If potential historic, archaeological, or paleontological resources are uncovered during excavation or construction activities at the project site, work in the affected area will cease immediately and a qualified person (meeting the Secretary of the Interior's standards (36CFR61)) shall be consulted by the applicant to evaluate the find, and as appropriate recommend alternative measures to avoid, minimize, or mitigate negative effects on the historic, prehistoric, or paleontological resource. Determinations and recommendations by the consultant shall be implemented as deemed appropriate by the Community & Economic Development Director, in consultation with the State Historic Preservation Officer (SHPO)

and any and all affected Native American Tribes before any further work commences in the affected area.

If human remains are discovered, work in the affected area shall cease immediately and the County Coroner shall be notified. If it is determined that the remains are potentially Native American, the California Native American Heritage Commission and any and all affected Native American Indians tribes such as the Morongo Band of Mission Indians or the Pechanga Band of Luiseno Indians shall be notified and appropriate measures provided by State law shall be implemented (GP Objective 23.3, DG, CEQA)."

5.4.4 GEOLOGY/SOILS

No known earthquake faults traverse the Project site and the Project site is not located within an Alquist-Priolo fault zone (Southern California Geotechnical, p. 10). Because there are no faults located on the Project site, there is no potential that the Project could not expose people or structures to adverse effects related to ground rupture.

The Project site is located in a seismically active area of Southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project; however, this risk is not considered substantially different than that of other similar properties in the Southern California area. As a mandatory condition of Project approval, the Project would be required to construct proposed structures in accordance with the California Building Standards Code (CBSC), also known as California Code of Regulations (CCR), Title 24 and the City Building Code. The CBSC and City Building Code are designed to minimize adverse effects associated with strong seismic ground shaking. With mandatory compliance with standard design and construction measures, potential adverse impacts would be reduced to less than significant and the Project would not expose people or structures to substantial adverse effects, including loss, injury or death, involving seismic ground shaking.

The Project site is not located within a "Potential Liquefaction" zone (City of Moreno Valley 2006a, p. 6-18). Furthermore, a geotechnical report prepared for the subject property concludes that the risk of liquefaction at the Project site is low due to the subsurface conditions that include medium dense well-graded granular soils and a lack of shallow groundwater table (Southern California Geotechnical, p. 11). Furthermore, the site would be designed in accordance with the latest applicable seismic safety guidelines, including the requirements of the CBSC, which is anticipated to reduce the risk of seismic-related ground failure to less than significant levels. As such, development of the Project site would result in less than significant risks related to seismic-related ground failure, including liquefaction.

The Project site is relatively flat, as is the surrounding area. There are no hillsides or steep slopes on the site or in the vicinity of the Project site. Accordingly, the Project site is located within an area with no potential for landslides, and development on the subject property would not be exposed to any risk of landslide.

Development of the Project site would disturb the site during grading and construction and expose the underlying soils, which would increase erosion susceptibility. The Project's required adherence to standard regulatory requirements would lessen any potential erosion impact to below a level of

significance. These include, but are not limited to, requirements imposed by the City of Moreno Valley's National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit (State Water Resources Control Board Order No. 99-08-DWQ), which requires the preparation of a Project-specific Water Quality Management Plan (WQMP) and the implementation of Best Management Practices (BMPs) to minimize the soil erosion and sedimentation in stormwater runoff leaving the Project site. In the long-term, development of the subject property would introduce additional impervious surfaces and landscaping on the Project site, thereby reducing the potential for erosion and loss of topsoil.

The geotechnical report for the Project site by Southern California Geotechnical Inc. in January 2012 determined that most soils within the subject property consist of sands and silty sands that are non-expansive. However, soils with increased clay content are located at depths below five feet, and could be encountered during required remedial grading activities (Southern California Geotechnical, p. 12). The proposed Project would be subject to the recommendations of the geotechnical report, as well as future geotechnical recommendations associated with future grading and building permits, which would ensure that any potentially expansive soils encountered during remedial grading on the Project site are appropriately remediated through site design considerations. Accordingly, the proposed Project would be subjected to less than significant risks related to unstable geologic units/soils and/or expansive soils.

For the reasons stated above, the proposed Project would result in less than significant impacts to geology/soils.

5.4.5 HAZARDS AND HAZARDOUS MATERIALS

The portion of the property developed as parking lot contains no known hazardous materials. According to a review of available historical data, it appears that the undeveloped portion of the subject property was vacant land from at least 1938 to the present. No evidence of hazardous materials, hazardous waste, underground storage tanks (USTs), above-ground storage tanks (ASTs), transformers or other potentially PCB-containing equipment were observed onsite during a site reconnaissance (URS Corporation 2012d, p. ES-1). Additionally, the site is not listed in any regulatory database for hazardous materials sites (URS Corporation 2012d, pp. 6-1 to 6-4). The March Air Reserve Base (ARB), located about 0.9-mile west of the proposed Project site, is documented as having the potential for groundwater contamination associated with its past use, but the Phase I ESA reports conclude that due to the orientation of groundwater flows in the area and distance to the March ARB, the potential for groundwater contamination at the proposed Project site is considered low (URS Corporation 2012d, p. 6-4). No other contaminated sites within the vicinity have the potential to create a significant hazard to future site workers (URS Corporation 2012d, p. 6-3 & 6-4). Accordingly, a less than significant impact associated with contamination on or affecting the proposed Project site would occur.

The specific business or tenant that will occupy the Project site's proposed building is not known at this time. The Project site is located within the Moreno Valley Industrial Area Plan, and the Plan designates the site for "Industrial" land uses. Based on the list of land uses permitted in the Industrial zone by the Moreno Valley Area Plan, it is possible that hazardous materials could be used during the course of daily operations. Examples of types of businesses that could occupy the proposed buildings on-site include warehouses, distribution businesses, and manufacturing industries.

Hazardous materials used by the future tenant of the Project may include chemical reagents, solvents, fuels, paints, and cleansers. Potential on-site uses also could generate hazardous byproducts that eventually must be handled and disposed of as hazardous materials. If businesses that use or store hazardous materials occupy the Project, the business owner and operator would be required to comply with all applicable federal, state, and local regulations to ensure proper use, storage, and disposal of hazardous substances. With mandatory regulatory compliance, the Project would not pose a significant hazard to any nearby use and any impacts would be less than significant.

The nearest school site, El Potrero Elementary School, is located approximately 0.7-mile northeast of the site. There are no school sites planned within one quarter mile of the site as part of the General Plan or MVIAP. Accordingly, the proposed Project has no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The Project site is located 0.9-mile east of the March ARB. There are no private airfields in the vicinity of the Project site. Pursuant to the March ARB Compatible Use Zone Study commissioned by the United States Air Force and as depicted on Figure 6-5 of the Moreno Valley General Plan, the Project site is not located within a zone subject to hazards related to air crashes (City of Moreno Valley 2006a, p. 6-30). Accordingly, implementation of the proposed Project would not result in a safety hazard for people residing or working in the Project area, and impacts would be less than significant.

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. During construction and long-term operation, the proposed Project would be required to maintain adequate emergency access for emergency vehicles as required by the City. Because the Project would not interfere with an adopted emergency response or evacuation plan, impacts are evaluated as less than significant.

The proposed Project is not located within a high wildfire hazard area (City of Moreno Valley 2006b, p. 5.5-5). The proposed Project site is located in an area that has been largely developed, with an existing industrial warehouse building located west of the site, industrial warehouse uses located east of the site, and disturbed lands and single family residences located to the south and north of the site. Accordingly, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

For the reasons stated above, the proposed Project would result in less than significant impacts to hazards and hazardous materials.

5.4.6 HYDROLOGY/WATER QUALITY

Water runoff from developed areas of the Project site may contain urban pollutants such as petroleum products, fertilizers, pesticides, soils, etc., which can degrade water quality if discharged from the site. The Project's Preliminary Water Quality Management Plan (WQMP) is prepared in accordance with City requirements to identify pollutants of concern and identify means to reduce their discharge from the site (i.e., Best Management Practices, BMPs). Required adherence to the Project-Specific WQMP would reduce the amount of pollutants in stormwater runoff, as well as non-storm water discharges. Furthermore, the Project will be required to comply with the Santa Ana River Basin

Water Quality Control Program and the City of Moreno Valley's National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit requirements (which requires the preparation of Stormwater Pollution Prevention Program (SWPPP) to control sediment/siltation runoff) to minimize the discharge of pollutants in storm water during short-term construction and long-term operational activities. Mandatory compliance with the Project's WQMP, in addition to compliance with NPDES Permit requirements, would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged into receiving waters. Therefore, implementation of the proposed Project would not violate any water quality standards or waste discharge requirements, and impacts would be less than significant.

The Project does not propose the installation of any water wells that would directly extract groundwater; however, the change in pervious surfaces to impervious surfaces that would occur with development of the site could reduce the amount of water percolating down into the underground aquifer that underlies the Project site and a majority of the City. However, and as noted in the City's General Plan EIR "the impact of an incremental reduction in groundwater would not be significant as domestic water supplies are not reliant on groundwater as a primary source (City of Moreno Valley 2006b, p. 5.7-12)." Accordingly, with buildout of the Project, the local groundwater levels would not be affected. Therefore, impacts to groundwater supplies and recharge would be less than significant.

The Project would involve demolition activities and mass grading of the site, which would alter the existing drainage pattern. Any alteration in drainage pattern has the potential to result in erosion and siltation both on-site during construction and off-site upon build-out of the Project, and also has the potential to increase the risk of on- and off-site flooding. To fully and more accurately determine the extent of potential erosion/siltation and flooding on- or off-site, a site-specific hydrology study was prepared for the Project site. The hydrology study evaluated the difference between existing and post-development drainage conditions, and determined that with buildout of the proposed Project there would be no substantial alteration to the existing drainage pattern of the site facilities because proposed stormwater drainage facilities on-site would attenuate the rate and volume of storm water discharge to be similar to the rate and volume that occurs under existing conditions (Albert A. Webb Associates 2012b, pp. 1-3). Accordingly, there would not be any significant increases in erosion/siltation or flooding on- or off-site. Impacts would be less than significant.

The Project site is not located within or adjacent to a 100-year floodplain (City of Moreno Valley 2006a, p. 6-26 and City of Moreno Valley 2006b, p. 5.5-5). Accordingly, the proposed Project would not place structures within a 100-year flood hazard area which could impede or re-direct flood flows. Furthermore, the proposed Project does not include housing. Therefore, there is no potential for the Project o place housing within a 100-year floodplain.

The nearest dam to the Project site is Lake Perris, located approximately 1.75 miles southeast of the subject property. Due to the distance of Lake Perris from the Project site and the topographic characteristics of the area, failure of a dam at Lake Perris would not expose people or structures on the Project site to flooding.

The Pacific Ocean is located more than 38 miles from the Project site; consequently, there is no potential for tsunamis to impact the Project. In addition, no steep hillsides subject to mudflow are located on or near the Project site. The nearest large body of water to the Project site is Lake Perris,

located approximately 1.75 miles southeast of the Project site. Due to the distance of Lake Perris from the Project site and the topographic characteristics of the area, a seiche in Lake Perris would not impact the Project site. Although the Project site is located 0.25 mile south of the Perris Valley Channel, the Perris Valley Channel is not an enclosed or semi-enclosed basin that would be conducive to reverberation and creation of a seiche. Therefore, impacts associated with seiches, mudflows, and/or tsunamis would not occur.

For the reasons stated above, the proposed Project would result in less than significant impacts to hydrology/water quality.

5.4.7 LAND USE/PLANNING

The Project proposes to develop a logistics center warehouse building on a property that consists of a truck trailer parking lot and undeveloped land under existing conditions. Properties adjacent to the Project site have either been developed or are planned for development with industrial land uses. The subject property is designated for "Business Park/Light Industrial" land uses pursuant to the City of Moreno Valley General Plan, and is zoned for "Industrial" uses pursuant to the MVIAP. Development of the proposed warehouse building on the subject property would not conflict with applicable land use plans, policies, or regulations, and would not physically divide an established community.

As discussed in Section 4.5, *Biological Resources*, the proposed Project is subject to the adopted "The Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County, California" and the adopted Western Riverside County MSHCP, which are the habitat conservation plans applicable to the City of Moreno Valley and the proposed Project site. The proposed Project is not located within any MSHCP designated Criteria Cells or Cell Groups, and the proposed Project site does not contain any riparian/riverine areas or vernal pools. The Project is subject to pre-construction surveys for the burrowing owl and mitigation measures are applied in Section 4.5 to ensure that the Project would comply with the MSHCP's species-specific survey and conservation requirements for the burrowing owl. From a land use and planning prospective, the Project would not conflict with the MSHCP because the property is not designated for conservation and would comply with all required species survey requirements.

For the reasons stated above, the proposed Project would result in less than significant impacts to land use/planning.

5.4.8 MINERAL RESOURCES

The Project site is not located within an area known to be underlain by regionally- or locally-important mineral resources, or within an area that has the potential to be underlain by regionally- or locally-important mineral resources (City of Moreno Valley 2006b, p. 5.14-2). Accordingly, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State of California. Accordingly, impacts to mineral resources would be less than significant.

5.4.9 POPULATION AND HOUSING

The proposed Project would develop the subject property with a logistics center warehouse building in accordance with the "Business Park/Light Industrial" land use designation applied to the site by the City of Moreno Valley General Plan and the "Industrial" zoning designation applied to the Project site by the MVIAP. Accordingly, the Project would not result in growth that was not already anticipated by the City of Moreno Valley General Plan and evaluated in the City of Moreno Valley General Plan FEIR. The Project site is served by existing public roadways and utility infrastructure is already installed beneath public rights of way that abut the property. As such, implementation of the Project would not result in direct or indirect growth in the area, and impacts are evaluated as less than significant. As such, implementation of the Project would not result in direct or indirect growth in the area, and impacts are evaluated as less than significant.

Under existing conditions the Project site is partially developed as a parking lot and partially vacant. The property contains no residential structures. Accordingly, implementation of the Project would not displace housing or people, and would not necessitate the construction of replacement housing elsewhere; thus, impacts would not occur.

For the reasons stated above, the proposed Project would result in no impacts to population/housing.

5.4.10 PUBLIC SERVICES

The proposed Project would be primarily served by the College Park Fire Station (Station No. 91), an existing station located approximately 2.3 roadway miles northeast of the proposed Project site. The Project site also could be served by the Kennedy Park Fire Station (Station No. 65), an existing station located approximately 2.8 roadway miles north of the Project. The proposed Project would be required to provide a minimum of fire safety and support fire suppression activities, including type of building construction, fire sprinklers, a fire hydrant system and paved access to the proposed Project area. Furthermore, the proposed Project is required to comply with the provisions of the City of Moreno Valley's Development Impact Fee Ordinance (Ordinance No. 695), which requires a fee payment that the City applies to the funding of public facilities, including fire protection facilities. Mandatory compliance with the Development Impact Fee Ordinance would be required prior to the issuance of building permits. Based on the foregoing, the proposed Project would receive adequate fire protection service, and would not result in the need for new or physically altered fire protection facilities.

The development of the subject property with business park/light industrial land uses would introduce new structures and employees to the Project site. This increase in the developed environment would result in an incremental increase in demand for police protection services, but would not require or result in the construction of new or physically altered police facilities. Prior to the issuance of building permits, the Project Applicant would be required to comply with the provisions of the City of Moreno Valley's Development Impact Fee Ordinance (Ordinance No. 695), which requires a fee payment that the City applies to the funding of public facilities, including police facilities. Based on the foregoing, the proposed Project would receive adequate police protection service, and would not result in the need for new or physically altered police protection facilities. Impacts to police protection facilities are therefore evaluated as less than significant.

The Project would not create a direct demand for public school services, as the subject property would be developed solely with one warehouse building and would not generate any school-aged children requiring public education. The addition of employment uses on the Project site would assist in the achievement of the City's goal to provide a better jobs/housing balance within the City and the larger western Riverside County region. Thus, the Project is not expected to draw new residents to the region and would therefore not indirectly generate additional school-aged students requiring public education. Because the Project would not directly generate students and is not expected to indirectly draw students to the area, the proposed Project would not result in the need to construct new or physically altered public school facilities. Regardless, the Project Applicant would be required to contribute development impact fees to the Val Verde Unified School District, in compliance with California Senate Bill 50 (Greene). Mandatory payment of school fees would be required prior to the issuance of building permits. Project-related impacts to public schools are evaluated as less than significant.

As discussed below under Subsection 5.4.11, the proposed Project would not create a demand for public park facilities and would not result in the need to modify existing or construct new park facilities. Accordingly, implementation of the Project would not adversely affect any park facility and impacts are regarded as less than significant.

The proposed Project would not result in a demand for other public facilities/services, including libraries, community recreation centers, and animal shelters. As such, implementation of the Project would not adversely affect other public facilities or require the construction of new or modified facilities.

For the reasons stated above, the proposed Project would result in less than significant impacts to public services.

5.4.11 RECREATION

The Project proposes to develop the site with one warehouse distribution building. The Project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. Accordingly, implementation of the Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park.

The Project does not propose to construct any new on- or off-site recreational facilities and would not expand any existing off-site recreational facilities. Therefore, adverse environmental impacts related to the construction or expansion of recreational facilities would not occur with implementation of the Project.

For the reasons stated above, the proposed Project would result in no impacts to recreation.

5.4.12 UTILITIES/SERVICE SYSTEMS

Wastewater service is provided to the Project site by EMWD. EMWD is required to operate all of its treatment facilities in accordance with the waste treatment and discharge standards and requirements set forth by the Regional Water Quality Control Board (RWQCB). The proposed Project would not

install or utilize septic systems or alternative wastewater treatment systems; therefore, the Project would have no potential to violate the applicable wastewater treatment requirements established by the RWQCB. With the exception of new on-site sewer conveyance lines, the Project would not create the need for any new or expanded wastewater facility (such as treatment facilities, storage tanks, or pump stations). The construction of on-site sewer facilities would result in physical impacts to the surface and subsurface of the Project site; however, these impacts are considered to be inherent to the Project's construction phase and are evaluated throughout this EIR accordingly. In instances where significant impacts have been identified for the Project's construction phase, mitigation measures are recommended in each applicable subsection of this EIR, as feasible. There would be no significant environmental effects created particular to on-site water line installation.

With the exception of new on-site water service lines, the Project would not create the need for any new or expanded water facility (such as treatment facilities, storage tanks, or pump stations). The construction of on-site water facilities would result in physical impacts to the surface and subsurface of the Project site (with small encroachments into adjacent public rights of way of developed/paved streets); however, these impacts are considered to be inherent to the Project's construction phase and are evaluated throughout this EIR accordingly. In instances where significant impacts have been identified for the Project's construction phase, mitigation measures are recommended in each applicable subsection of this EIR, as feasible. There would be no significant environmental effects created particular to on-site water line installation.

The Project also includes regional storm drain improvements in San Michele Road (along the northern Project site border) and in Perris Boulevard from San Michele Road south to the connection with the existing line. Both San Michele Road and Perris Boulevard are developed/paved streets under existing conditions and the construction of proposed regional storm drain improvements beneath the public rights of way of developed/paved streets would not result in a new physical disturbance. Impacts associated with proposed storm drain improvements are inherent to the Project's construction phase and are evaluated throughout this EIR accordingly. In instances where significant impacts have been identified for the Project's construction phase, mitigation measures are recommended in each applicable subsection of this EIR, as feasible.

The operation of one warehouse building on the Project site would result in an increase in demand for potable water resources from the local water purveyor, EMWD. However, the proposed Project is fully consistent with the assumptions made in EMWD's 2010 Urban Water Management Plan. EMWD's 2010 Urban Water Management Plan concludes that the EMWD has sufficient water supplies available to serve planned land uses within its service area through at least 2035. Because sufficient water supplies are available to service the proposed Project as documented in EMWD's Urban Water Management Plan, impacts would be less than significant.

The one warehouse building proposed by the Project would generate wastewater that would be conveyed to the Perris Valley Regional Water Reclamation facility, which is owned and operated by EMWD. Under existing conditions, the Perris Valley Regional Water Reclamation facility has a daily treatment capacity of 15 million gallons per day. Following completion of an ongoing expansion project, the treatment capacity of this plant will increase to 22 million gallons per day. Based on EMWD's standard wastewater demand generation rate of 1,700 gallons per day per acre of

industrial land uses, the proposed Project is estimated to demand approximately 29,410 gallons of wastewater service per day[2]. This generally corresponds to approximately two-tenths of one percent (0.20 percent) of the existing treatment capacity and approximately thirteen hundredths of one percent (0.13 percent) of future treatment capacity (following completion of the expansion project) at the Perris Valley Regional Water Reclamation Facility. Due to the relatively small amount of wastewater that would be generated by proposed Project and the amount of available capacity at this facility, it is anticipated that the Perris Valley Regional Water Reclamation Facility would have sufficient capacity to treat wastewater generated by the Project. As such, implementation of the Project results in a determination that adequate capacity is available to serve the Project's projected wastewater demand in addition to EMWD's existing commitments. Impacts would be less than significant.

Implementation of the proposed Project would generate solid waste requiring off-site disposal during short-term construction and long-term operational activities. During the construction phase, approximately 868.3 tons of waste would be generated during building construction, installation of subsurface/utility improvements, and installation of landscaping. The Project would be required to comply with City of Moreno Valley Ordinance No. 706, which requires a minimum of 50 percent of all construction waste and debris to be recycled. As such, the Project is estimated to generate approximately 434.2 tons of waste during construction, which corresponds to an average of 2.7 tons per day over the construction phase of the Project (eight months or 160 working days). Long-term operation of the Project is estimated to generate approximately 2.8 tons of solid waste per day. Solid waste generated by the proposed Project would be disposed at the El Sobrante Landfill, the Badlands Sanitary Landfill, and/or the Lamb Canyon Sanitary Landfill. Each of these landfills receive well below their maximum permitted daily disposal volume and have the potential for future expansion, and none of these regional landfill facilities are expected to reach their total maximum permitted disposal capacities during the Project's construction or operational periods. Accordingly, the Project would be served by landfills with sufficient available capacity to accept waste generated by the Project. Impacts would be less than significant.

The Project would be required to comply with the City of Moreno Valley's waste reduction programs, including recycling and other diversion programs to divert the amount of solid waste deposited in landfills. As such, the Project applicant or master developer would be required to implement feasible waste reduction programs, including source reduction, recycling, and composting. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code § 42911), the Project would provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The implementation of these programs would reduce the amount of solid waste generated by the Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project would comply with all applicable solid waste statutes and regulations; as such, impacts would be less than significant.

For the reasons stated above, the proposed Project would result in less than significant impacts to utilities/service systems.

[2]Source: Eastern Municipal Water District. *Sanitary Sewer System Planning & Design*. September 1, 2006.

6.0 ALTERNATIVES TO THE PROPOSED PROJECT

State CEQA Guidelines §15126.6(a) indicates the scope of alternatives to a proposed project that must be evaluated:

> *"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."*

As discussed in Section 4.0 of this EIR, the proposed Project would result in significant adverse environmental effects to air quality, noise, and transportation/traffic that cannot be mitigated to below levels of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures. The unavoidable significant impacts are:

- Air Quality: Significant direct and cumulative long-term air quality impact due to an exceedance of the SCAQMD regional threshold for NO_X emissions, which also would cumulatively contribute to an existing air quality violation within the SCAB (i.e., non-attainment status for ozone) because NO_X emissions are a precursor for ozone.

- Noise: Significant direct and cumulative near-term noise impact to due to the generation of noise levels during Project construction that exceed the City of Moreno Valley's Noise Ordinance standard of 65 dBA Leq at a distance of 200 feet from the property line.

- Transportation/Traffic: Significant cumulative near-term impact to the intersections of Western Way/Harley Knox Boulevard and Indian Street/ Harley Knox Boulevard.

CEQA Guidelines §15126.6(e) requires that an alternative be included that describes what would reasonably be expected to occur on the property in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services. This is considered to be the No Project Alternative. In the case of the proposed Project, there are two No Project Alternatives, as described in detail below. The *No Project/Trailer Yard Alternative* is identified as the most environmentally superior alternative. CEQA requires that if the environmentally superior alternative is determined to be a No Project Alternative, then another environmentally superior alternative should be identified among the other alternatives, if the analysis indicates that significant impacts can be avoided by one or more of the other alternatives. Therefore, the Reduced Project/North Building Alternative is identified as the environmentally superior alternative.

6.1 ALTERNATIVES UNDER CONSIDERATION

The following scenarios are identified by the City of Moreno Valley as potential alternatives to implementation of the proposed Project.

❑ Alternative 1 – No Project/Trailer Yard Alternative

The No Project/Trailer Yard Alternative assumes that the proposed Project is not approved, and that the site would be developed in accordance with its existing entitlements pursuant to previously approved Amended Plot Plan P12-061. Under this alternative, improvements on the site would involve the expansion of the existing truck trailer yard to the northern portion of the property, thereby increasing the number of truck trailer parking spaces on-site from 338 spaces to 722 spaces. Access to the property would be afforded via a driveway along San Michele Road, and via the existing driveway located along Nandina Avenue. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project against what could reasonably occur on the Project site under existing entitlements. If the Project were not approved, it is reasonable to expect that the property would be developed in accordance with previously approved Amended Plot Plan P12-061.

❑ Alternative 2 – No Project/Industrial Building Alternative

The No Project/Industrial Building Alternative assumes that the proposed Project is not approved, and that the site would be developed in accordance with existing entitlements. Under this alternative, the northern portion of the site would be developed with a truck trailer yard consisting of approximately 384 trailer spaces, as approved by Amended Plot Plan P12-061, while the southern portion of the site would be developed with a 181,031 s.f. industrial building (inclusive of 5,000 s.f. of office, 2,000 s.f. of mezzanine, and 173,031 s.f. of industrial warehouse) pursuant to previously approved Plot Plan PA07-0167. To construct the building, the existing parking lot located in the southern portion of the property would be demolished. The industrial building would include a total of 26 dock doors and 106 standard and handicap parking spaces. Access to the site would be provided via driveways along Nandina Avenue, Perris Boulevard, and San Michele Road. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project against what could reasonably occur on the Project site under existing entitlements. If the Project were not approved, it is possible that the property would be developed in accordance with previously approved Amended Plot Plan P12-061 and previously approved Plot Plan PA07-0167.

❑ Alternative 3 – Reduced Project/Small Buildings Alternative

The Reduced Project/Small Buildings Alternative considers development of the site with two smaller industrial buildings consisting of a 194,525 s.f. building in the northern portion of the site (including 5,000 s.f. of office and 189,525 s.f. of industrial warehouse) and a 181,031 s.f. building in the southern portion of the site (including 6,000 s.f. of office, 2,000 s.f. of mezzanine space, and 173,031 s.f. of industrial warehouse), for a total of 375,556 s.f. of industrial building area. This alternative would result in a reduction in building area on the site by approximately 24,574 s.f. as compared to the 400,130 s.f. building that would be constructed under the proposed Project (or a 6% reduction in building area). Under this alternative, a total of 62 trailer parking spaces would be provided, in addition to 193 standard and handicap parking spaces. Access to the site would be provided via driveways along Nandina Avenue, Perris Boulevard, and San Michele Road. This alternative was

selected by the Lead Agency to compare the environmental effects of the proposed Project (one larger building that is likely to attract one tenant) against the environmental effects of constructing two smaller buildings that is likely to attract two different tenants.

❑ Alternative 4 – Reduced Project/North Building Alternative

The Reduced Project/North Building Alternative is identified as the Environmentally Superior Alternative. It would involve no changes to the existing trailer parking in the southern portion of the site, while the northern portion of the site would be developed with a 194,525 s.f. industrial building (which includes 5,000 s.f. of office and 189,525 s.f. of industrial warehouse). Under this alternative, the number of truck trailer parking spaces provided on the site would increase by 30 spaces (providing for a total of 368 trailer parking spaces), while an additional 86 standard and handicap parking spaces also would be provided. Site access under this alternative would be afforded via new driveways along San Michele Road and Perris Boulevard, while the existing access via the adjacent lot along Nandina Avenue would be maintained. This alternative was selected for consideration by the Lead Agency to evaluate the comparative environmental benefits of reducing the amount of building area on the site, while maintaining the existing parking facility in the southern portion of the site.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by CEQA Guidelines §15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the proposed Project, CEQA Guidelines §15126.6(f)(1) notes:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…"*

In determining an appropriate range of alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Alternatives were rejected because either: 1) they could not accomplish the basic objectives of the Project, 2) they would not have resulted in a reduction of significant adverse environmental impacts, or 3) they were considered infeasible to construct or operate. The reason for not selecting each alternative is discussed below.

❑ Alternative Sites

CEQA does not require that an analysis of alternative sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site then this alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the "key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project

in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (CEQA Guidelines §15126.6(f)(2)).

The Project as proposed is consistent with the Business Park/Light Industrial and Commercial land use designations applied to the property by the City of Moreno Valley General Plan and as further detailed by the Industrial and Industrial Support Areas designations applied to the property by the Moreno Valley Industrial Area Plan (Specific Plan 208). An examination of alternative sites is typically not necessary when a proposed development project is consistent with the applicable land use plan, because it can reasonably be assumed that development would ultimately occur in conformance with the applicable land use designation, whether by the Project Applicant or by others in the future. In cases where a proposed project is consistent with the applicable General Plan, the alternatives analysis should typically focus on options for developing the site consistent with adopted plan policies and the discussion of alternatives should search for an environmentally superior version of the project on the site instead of an alternative site.

The Project site is flat and is highly disturbed due to prior development of a parking site in the southern portion of the site and regular discing that occurs for fire fuel management in the northern portion of the site. And, as previously discussed, the property is entitled to be developed pursuant to previously approved Amended Plot Plan P12-061 and previously approved Plot Plan PA07-0167. CEQA analysis for site disturbance associated with those approvals was completed, consisting of a Mitigated Negative Declaration (MND) and two MND Addenda (SCH No. 2008101041). Locating the proposed Project on an alternative site, therefore, would not avoid physical disturbance of the property. It also would not avoid the implementation of either the No Project/Trailer Yard Alternative (Alternative 1) or the No Project/Industrial Building Alternative (Alternative 2) because existing entitlements are already in place to construct those alternatives on the property. The only potential advantage, then, to selecting an alternative site for the proposed Project would be to displace the Project's operational effects to a different location.

The Project site is surrounded by properties developed with or planned for the future construction of industrial land uses. Few other properties in the City of Moreno Valley and western Riverside County would offer less developmental and environmental constraints, or fewer physical environmental impacts than the proposed Project site. Development of the Project in an alternate location would have similar impacts as would occur with implementation of the Project at its proposed location, and may even increase environmental effects because the Project built in another location would be compounded with the effects of either the No Project/Trailer Yard Alternative (Alternative 1) or the No Project/Industrial Building Alternative (Alternative 2) because existing entitlements are already in place to construct those alternatives on the property. For these reasons, an alternative sites analysis is not required for the proposed Project.

❑ Alternative Land Use

Development of the Project site with a land use other than industrial warehousing was considered, but rejected because other land uses would be inconsistent with the property's General Plan and zoning designations and not meet any of the Project's objectives. Additionally, development of the Project site with a building type other than warehouse and permitted by General Plan and zoning designations was considered but rejected because other permitted building types (manufacturing and

commercial/service) would create the same or similar construction-related impacts as the proposed Project, but would substantially increase operational impacts because these land use types generate more traffic and consequently would generate more operational noise and air emissions. For these reasons, alternative land uses on the property were considered and rejected.

❑ Construction Noise Avoidance Alternative

An alternative was considered that would avoid the proposed Project's construction-related noise impacts. As disclosed in EIR Section 4.3, near-term construction activities would exceed the City's Noise Ordinance standard of 65 dBA at a distance of 200 feet from the property line during all six (6) phases of construction. As shown in EIR Tables 4.3-5 through 4.3-10, in order to avoid a significant impact due to a conflict with the Noise Ordinance, construction activities would need to be set back from the property line by a distance ranging from 565 feet (during architectural coating) to 2,774 feet (during site grading activities). It would not be feasible to construct the proposed Project while restricting construction activities by 565 feet to 2,774 feet from the property line. Accordingly, the Construction Noise Avoidance Alternative has been rejected from detailed consideration in this EIR because it is infeasible.

6.3 ALTERNATIVES ANALYSIS

The following discussion compares the impacts of each alternative considered by the Lead Agency with the impacts of the proposed Project, as detailed in Section 4.0, Environmental Analysis, of this EIR. A conclusion is provided for each impact as to whether the alternative results in one of the following: (1) reduction or elimination of the proposed Project's impact, (2) a greater impact than would occur under the proposed Project, (3) the same impact as the proposed Project, or (4) a new impact in addition to the proposed Project's impacts. Table 6-1 at the end of this section compares the environmental hazard and resource impacts of the alternatives with those of the proposed Project and identifies the ability of the Alternative to meet the basic objectives of the Project. As described in EIR Subsection 3.2, the proposed Project's objectives are:

A. To construct and operate a logistics center warehouse building in the City of Moreno Valley on a property designated for industrial development by the City of Moreno Valley General Plan and the Moreno Valley Industrial Area Plan (Specific Plan 208.)

B. To develop a logistics center warehouse building that is feasible to construct and operate and that appeals to light industrial and warehouse distribution tenants seeking to locate in the Moreno Valley area.

C. To make efficient use of property designated for industrial development by developing a logistics center warehouse building on a property that is adjacent to existing warehouse development and that achieves a minimum floor area ratio (FAR) of 0.5.

D. To construct and operate a logistics center warehouse building within five miles of major regional transportation corridors.

E. To attract new businesses and jobs to the City of Moreno Valley, thereby providing a more equal jobs/housing balance both in the city and in Riverside County and reducing the need for members of the existing local workforce to commute outside the area for employment.

6.3.1 ALTERNATIVE 1 – NO PROJECT/TRAILER YARD ALTERNATIVE

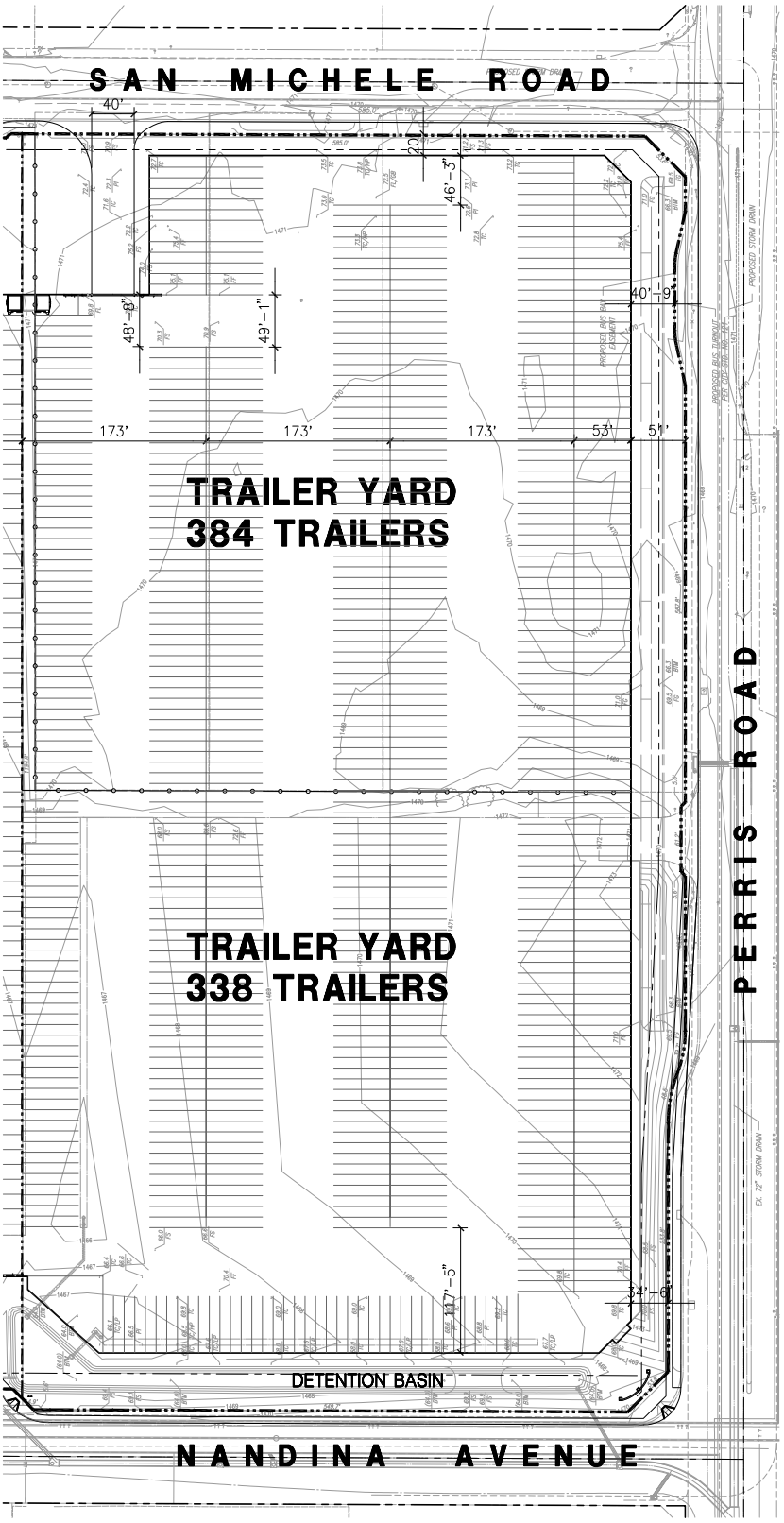
The No Project/Trailer Yard Alternative allows the decision-makers to compare the impacts of approving the proposed Project against the impacts of not approving the Project. If the Project were not approved, it is reasonable to expect the property to develop in accordance with previously approved permits. Under existing entitlements (specifically, Amended Plot Plan P12-061), the existing truck trailer parking lot in the southern portion of the site would remain. This parking area would be expanded onto the northern portion of the site to include an additional 509 trailer parking spaces, resulting in a total of 722 spaces on the site (including 338 spaces on the southern portion of the site and 384 spaces in the northern portion of the site). The existing parking area and expanded parking area would serve the existing 691,960 s.f. building located to the immediate west and currently occupied by Harbor Freight Tools. Figure 6-1, *No Project/Trailer Yard Alternative*, depicts a site plan for the No Project/Trailer Yard Alternative. CEQA analysis for this alternative was previously completed, consisting of two MND Addenda (SCH No. 2008101041). All imposed Conditions of Approval and Mitigation Measures would apply.

Under this alternative, roadway frontage improvements along Perris Boulevard and San Michele Road would occur, including additional paved roadway and the construction of curbs and sidewalks. There would be no change to the Project frontage along Perris Boulevard or Nandina Avenue. Access to the site would be afforded via a new driveway constructed along San Michele Road, near the northwestern Project boundary, while the existing driveway providing access to Nandina Avenue via the adjacent lot to the west would be retained. Screen walls also would be constructed along San Michele Road and Perris Boulevard, while the existing screen walls along Perris Boulevard and Nandina Avenue would stay in place.

In order to construct the expanded parking lot, portions of the existing trailer parking area and associated screen walls would be demolished and replaced. Otherwise, the majority of construction activities associated with this alternative would be limited to the northern portion of the site, and along the eastern frontage with Perris Boulevard and the entire frontage of San Michele Road.

This alternative would be fully consistent with the site's existing General Plan and zoning designations. In addition, the parking area is proposed to be used only by trucks currently serving the existing building to the west. As such, under operational conditions, there would be no total increase in inbound or outbound traffic, nor would any other operational characteristics of the existing building to the west change as a result of this alternative.

Selection of the No Project/Trailer Yard Alternative would prevent the Project site from being developed with industrial buildings in the foreseeable future, but would not necessarily prevent the proposed Project or another project of its nature from being built in another location in response to the demand for industrial building space in western Riverside County. As discussed above, a detailed examination of alternative sites is not required in this EIR because the Project is consistent with its General Plan and Specific Plan land use designations applied to the property and locating the Project on an alternative site would not be environmentally superior. Nonetheless, the Lead Agency recognizes that selection of the No Project/Trailer Yard Alternative would not reduce the market demand for industrial building space in western Riverside County.



Source: HPA Architects (10-23-12)

FIGURE 6-1
No Project/Trailer Yard Alternative

❑ Air Quality

The No Project/Trailer Yard Alternative would not alter the land uses allowed on-site under the General Plan and zoning designations, and would not increase the intensity or amount of traffic that occurs under existing conditions because use of the parking yard would be limited to the existing building to the west currently occupied by Harbor Freight Tools. The parking area would only be used by trucks currently serving the existing building. Because the No Project/Trailer Yard Alternative is consistent with the site's existing General Plan and zoning designations that formed the basis for regional population projections used in the SCAQMD's AQMP, the No Project/Trailer Yard Alternative would not conflict with implementation of the AQMP, and a less than significant impact would occur. Similarly, the proposed Project also would be consistent with the site's existing General Plan and zoning land use designations and also would be consistent with the regional population projections used in the AQMP. Thus, both this alternative and the proposed Project would be consistent with the AQMP and no adverse impact would occur in either case.

Under the No Project/Trailer Yard Alternative, grading and the application of concrete and asphalt involved in the expansion of the parking lot would result in some construction emissions; however, construction activities under this alternative would be governed by the Mitigation Measures specified in MND Addenda No. 2 (SCH No. 2008101041) and Conditions of Approval associated Amended Plot Plan P12-061. Given the small size and duration of construction activities associated with expanding the existing parking yard to the northern portion of the property, short-term construction-related impacts would be less than significant with mitigation. Since the expanded parking lot would only be used by trucks serving the existing building to the west and would not increase the amount of operational traffic, long-term operational emissions would not occur nor result in any violations of an air quality standard or substantially contribute to a projected air quality violation. Accordingly, implementation of this alternative would reduce near-term construction-related impacts as compared to the proposed Project and would avoid the proposed Project's significant unavoidable long-term impacts due to NO_x emissions.

Based on the analysis contained in the 2008 MND and its associated Addenda (SCH No. 2008101041), and assuming mandatory implementation of the Mitigation Measures and Conditions of Approval associated with Amended Plot Plan P12-061, impacts to nearby sensitive receptors would be less than significant under this alternative. Near- and long-term air emissions under this alternative would be below the SCAQMD regional and localized thresholds of significance, and diesel particulate emissions would not expose sensitive receptors to significant cancer risks. Due to the reduced intensity of construction activities and reduced operational traffic associated with this alternative as compared to the proposed Project, air quality impacts affecting sensitive receptors would be reduced under this alternative. Neither this alternative nor the proposed Project would result in significant human health risks associated with air pollutant emissions.

Odors that would be associated with the No Project/Trailer Yard Alternative would be associated with near-term construction activities and diesel exhaust that would occur under both near-term construction and long-term operation. However, and as concluded in the MND and Addendum No. 2 (SCH No. 2008101041), impacts due to odors under this alternative would be less than significant due to the short-term duration and quantity of emissions, the predominantly industrial nature of the surrounding area, and the less than significant results of the localized significance threshold analysis. Similarly, because the proposed Project does not involve any land uses that would generate odors,

and since odors under near-term construction activities would be similar (particularly when asphalt is being installed), near- and long-term odors would be similar and less than significant under both this alternative and the proposed Project.

❑ Greenhouse Gas Emissions

The No Project/Trailer Yard Alternative would involve the expansion of an existing truck trailer parking area from 213 spaces to a total of 722 spaces. All traffic associated with this alternative would be strictly associated with the adjacent warehouse building to the west, as the expanded parking lot would merely serve this existing use. Because the No Project/Trailer Yard Alternative would not result in an increase in operational characteristics associated with the site (e.g., there would be no net increase in traffic), there would be no change in the amount of operational GHG emissions that occurs under existing conditions. As such, this alternative would not generate GHG emissions that would directly or indirectly have a significant impact on the environment.

Mitigation Measures and Conditions of Approval associated with Plot Plan P12-061 would apply to this alternative, including mitigation measures and conditions imposed to address air quality emissions. However, since this alternative would not result in the generation of additional vehicular trips, and because fossil fuel usage associated with this alternative would be limited to electricity generation for lighting and electrical outlets, this alternative has no potential to generate a substantial amount of GHG emissions that could cumulatively contribute to global climate change. As such, impacts from GHG emissions that conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs would not be significant under this alternative. Since neither the proposed Project nor the No Project/Trailer Yard Alternative would conflict with any applicable plans or policies addressing climate change, impacts would be less than significant under both this alternative and the proposed Project.

❑ Noise

Noise associated with the No Project/Trailer Yard Alternative would occur during near-term construction activities and under long-term operation. Construction characteristics associated with this alternative would be similar to the proposed Project, except that construction activities would be limited to the northern portion of the property and there would be no building construction phase or architectural coating phase. As with the proposed Project, near-term construction noise impacts associated with this alternative would exceed the City's Noise Ordinance threshold of 65 dBA at a distance of 200 feet from the property line during demolition, site preparation, grading, and paving activities, although impacts during building construction and architectural coating would be avoided. Although this alternative represents a reduction in short-term noise impacts as compared to the proposed Project, the impact would not be avoided.

Under long-term operational conditions, noise generated by the No Project/Trailer Yard Alternative primarily would be associated with trucks maneuvering and idling within the dock areas. Mitigation Measures and Conditions of Approval associated Amended Plot Plan P12-061 would apply to this alternative, including requirements to construct noise attenuation walls along the perimeter of the site and to construct access gates with solid materials to address on-site noise generation. With implementation of the Mitigation Measures and Conditions of Approval, site operational noise affecting nearby sensitive receptors would be below the City's 65 dBA CNEL exterior standard and impacts would be less than significant. Due to the reduction in traffic and site operational

characteristics associated with this alternative, operational noise would be reduced under this alternative as compared to the proposed Project.

No off-site noise increases would result from implementation of this alternative because there would not be an increase in traffic volumes and all truck trips would be associated with the existing warehouse building located to the west. As such, there would be no potential for the No Project/Trailer Yard Alternative to increase noise levels on nearby roadway segments, eliminating the proposed Project's contribution of up to 0.6 CNEL under long-term operating conditions.

Near-term ground-borne vibration or ground-borne noise effects would be temporary and infrequent during construction and would be less than significant under both the No Project/Trailer Yard Alternative and the proposed Project. Under long-term operational conditions, there would be no sources of ground-borne vibration or ground-borne noise associated with either the No Project/Trailer Yard Alternative or the proposed Project. Also, neither this alternative nor the proposed Project are noise-sensitive uses or involve an air travel component. Thus, there would be no impact associated with public or private airport usage with either the No Project/Trailer Yard Alternative or the proposed Project.

❑ Transportation and Traffic

The No Project/Trailer Yard Alternative would not involve any traffic increases, as all traffic would be associated with the existing warehouse building to the west. As such, this alternative would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and no impact would occur. In comparison, the proposed Project would result in cumulatively significant impacts to seven roadway segments and five intersections under Opening Year Cumulative (2017) conditions, which would be avoided by the selection of this alternative.

The No Project/Trailer Yard Alternative would not result in any new traffic; therefore, this alternative would have no impact on CMP facilities. Implementation of the proposed Project would result in cumulatively significant but mitigable impacts to CMP facilities (I-215 Ramps at Harley Knox Boulevard) and would contribute new vehicle trips to CMP facilities that would not occur under this alternative; therefore, impacts to CMP facilities would be decreased under this alternative as compared to the proposed Project.

Neither the No Project/Trailer Yard Alternative nor the proposed Project has the potential to affect air traffic patterns. As such, impacts to air traffic patterns would not occur, and would be similar under either this alternative or the proposed Project.

Under both the No Project/Trailer Yard Alternative and the proposed Project, roadway frontage improvements would be required to adhere to City requirements, thereby precluding the potential for introducing hazards due to a design feature. Additionally, because both the proposed Project and No Project/Trailer Yard Alternative would involve warehouse-related uses, and the site is located within a predominantly industrial warehousing area, there would be no transportation design hazard impacts due to incompatible uses.

Both the No Project/Trailer Yard Alternative and the proposed Project would be served by a minimum of two access points, which would provide for adequate emergency access. Accordingly, an impact due to inadequate emergency access would not occur, and such impacts would be identical under either the proposed Project or No Project/Trailer Yard Alternative.

Frontage improvements along San Michele Road and Perris Boulevard would occur under both the No Project/Trailer Yard Alternative and the proposed Project, and would accommodate all required sidewalks, bike lanes, and bus turnouts. There are no other pedestrian, bicycle, or public transit facilities planned near the proposed Project site (with exception of the bus turnout). Accordingly, impacts due to a conflict with adopted policies or programs regarding public transit, bicycle, and pedestrian facilities would be identical under this alternative and the proposed Project, and no impact would occur.

- **Biological Resources**

This alternative would result in full disturbance of the property, as would occur under the proposed Project. As such, impacts to biological resources that would occur under this alternative are the same as those impacts described in EIR Subsection 4.5 for the proposed Project. No biological resource impacts would be reduced or avoided.

- **Conclusion**

Implementation of the No Project/Trailer Yard Alternative would result in the expansion of an existing truck trailer parking lot from 213 stalls to 722 stalls, and would increase the size of the parking lot to cover the northern portion of the Project site. With exception of near-term noise impacts, all significant effects of the proposed Project would be avoided or lessened by the selection of this alternative.

The No Project/Trailer Yard Alternative would fail to meet the Project's objectives. This alternative would not achieve the objectives to construct and operate a logistics center warehouse, and would not achieve a minimum FAR of 0.5. This alternative also would not attract new businesses or jobs to the City of Moreno Valley because the parking yard would merely service the existing warehouse building to the west. Moreover, selection of the No Project/Trailer Yard Alternative, while preventing development of the property with a logistics center warehouse building, would not result in a reduction in demand for industrial business park development in western Riverside County; thus, it is likely for the Project's environmental impacts to occur elsewhere rather than be avoided.

6.3.2 ALTERNATIVE 2 – NO PROJECT/INDUSTRIAL BUILDING ALTERNATIVE

Like the No Project/Trailer Yard Alternative described above, the No Project/Industrial Building Alternative allows decision-makers to compare the impacts of approving the proposed Project against the impacts that would occur if the property were to be developed pursuant to existing entitlements. Under existing entitlements (specifically, Plot Plan 07-0167 and Amended Plot Plan P12-061), the northern portion of the site would be developed with a truck trailer yard while the southern portion of the site would be developed with a 181,031 s.f. industrial building (inclusive of 5,000 s.f. of office, 2,000 s.f. of mezzanine, and 173,031 s.f. of industrial warehouse). In order to construct this alternative, the existing parking area would be demolished and some grading activities would be required on-site both in association with the new building and the expanded parking area. Figure 6-

2, *No Project/Industrial Building Alternative*, depicts a conceptual site plan for the No Project/Industrial Building Alternative. CEQA analysis for this alternative was previously completed, consisting of an MND and two MND Addenda (SCH No. 2008101041). All imposed Conditions of Approval and Mitigation Measures would apply.

Under this alternative, roadway frontage improvements along Perris Boulevard and San Michele Road would occur, including additional paved roadway and the construction of curbs and sidewalks. There would be no change to the Project frontage along Perris Boulevard or Nandina Avenue. Access to the site would be provided by driveways along Nandina Avenue, including an existing driveway accessed via the adjacent parcel and a new driveway to be constructed adjacent to the office space in the southwestern corner of the lot; a new driveway along Perris Boulevard, immediately to the north of the proposed building; and a new driveway along San Michele Road to be constructed at the northwestern corner of the lot.

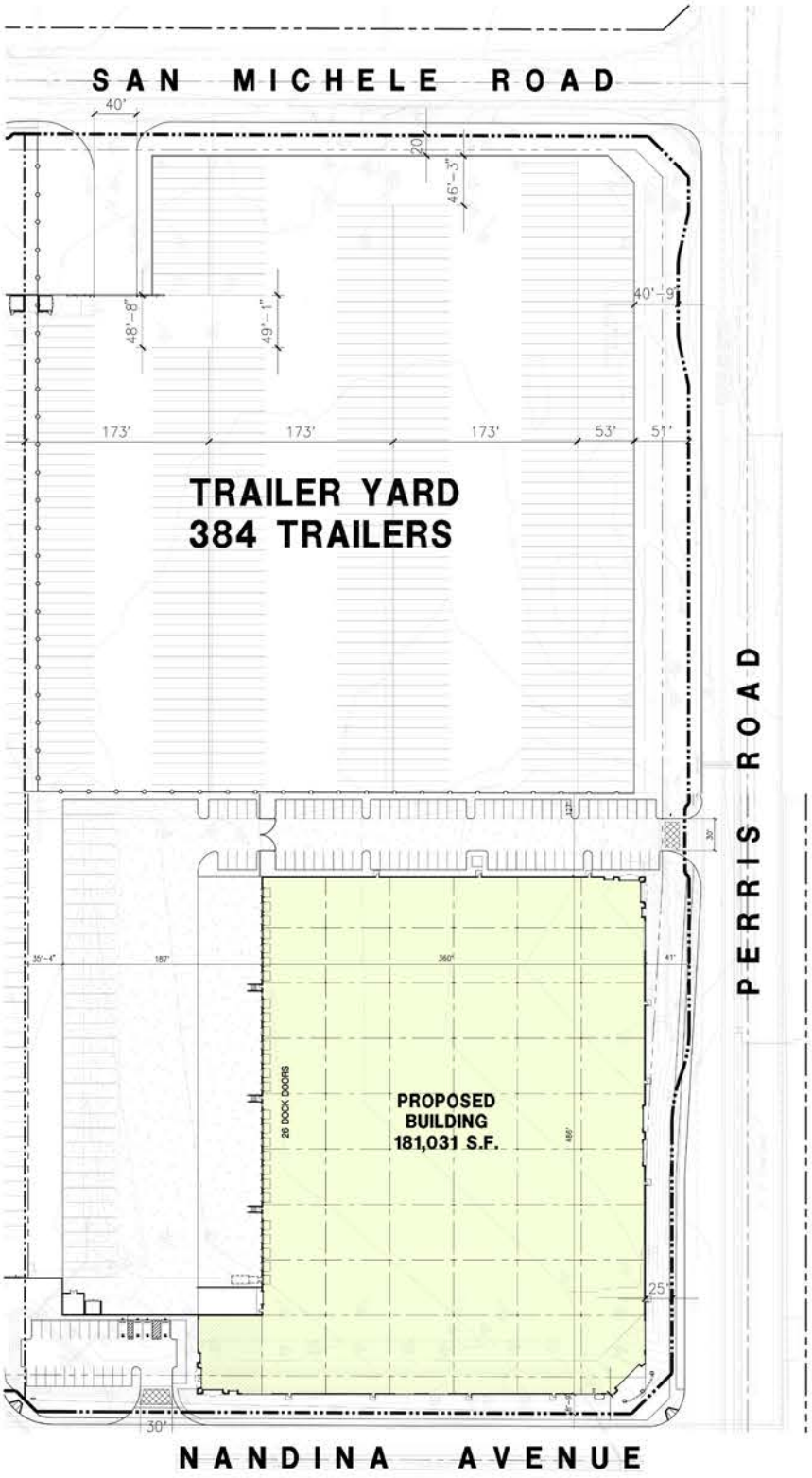
The existing screen walls located along the northern edge of the existing parking lot, along Perris Boulevard, and along Nandina Avenue would be demolished as part of this alternative. New screen walls would be constructed along the southern edge of the truck trailer parking area in the south of the site (just northerly of the parking lot for the office), and additional screen walls would be constructed along the frontage with Perris Boulevard (north of the proposed building) and along San Michele Road.

The industrial building proposed under this alternative would include a total of 26 dock doors and 106 standard and handicap parking spaces. The southwestern corner of the building (approximately 6,000 s.f.) would be dedicated for office space, while the remaining portions of the building would comprise 2,000 s.f. of mezzanine space and 173,031 s.f. of warehouse space.

Selection of the No Project/Industrial Building Alternative would reduce the amount of industrial warehouse building square footage on-site from 400,130 s.f. to 181,031 s.f., but would not necessarily prevent the additional square footage from being located in another location in response to the demand for industrial building space in western Riverside County. As discussed above, an examination of alternative sites is not required in this EIR because the Project is consistent with its General Plan and Specific Plan land use designations and locating the Project on an alternative site would not be environmentally superior. Nonetheless, the Lead Agency recognizes that selection of the No Project/Industrial Building Alternative would not reduce the market demand for industrial building space in western Riverside County.

❑ Air Quality

The No Project/Trailer Yard Alternative would not alter the land uses allowed on-site under the General Plan and zoning designations. Although traffic from the site would decrease under this alternative as compared to the proposed Project (from approximately 1,066 trips per day under the proposed Project to approximately 323 trips per day under this alternative), the development of an industrial building on the southern portion of the property would be consistent with the site's existing General Plan and zoning designations that formed the basis for regional population projections used in the SCAQMD's AQMP. As such, the No Project/Trailer Yard Alternative would not conflict with implementation of the AQMP, and no impact would occur. Similarly, the proposed Project also



Source: HPA Architects (10-23-12)

FIGURE 6-2
No Project/Industrial Building Alternative

would be consistent with the site's existing General Plan and zoning land use designations and also would be consistent with the regional population projections used in the AQMP. Thus, both this alternative and the proposed Project would be consistent with the AQMP and no adverse impact would occur in either case.

Under the No Project/Industrial Building Alternative, grading and concrete application involved in installing the parking lot, construction of the 181,031 s.f. building, and construction of screen walls would result in construction-related air emissions; however, construction activities under this alternative would be governed by the Mitigation Measures and Conditions of Approval associated with the original approvals (PA07-0165, PA07-0167, and P12-061). Given the small size and duration of construction associated with this alternative, short-term construction impacts due to the violation of an air quality standard or contribution to a projected air quality violation would be less than significant with mitigation. Due to the reduction in building area, near-term construction emissions would be reduced in comparison to the proposed Project, although both the proposed Project and this alternative would result in less than significant near-term air quality impacts during construction with the incorporation of mitigation measures.

Because the expanded parking lot would only be used by trucks serving the existing building to the west and the proposed new building, no additional traffic would be associated with the parking area. However, the new 181,031 s.f. building would generate approximately 323 trips per day (based on the information disclosed in the MND for PA07-0165, P07-166, PA07-0167). The projected increase in traffic from the site would require the implementation of Mitigation Measures and adherence to the Conditions of Approval associated with PA07-0165 and PA07-0167, which would reduce to a level below significant impacts due to the violation of air quality standards and/or contribution to an existing or projected air quality violation. Because the proposed Project would generate 743 more daily trips than would occur under this alternative, impacts to air quality standards and the level of contribution to existing or projected violations would be reduced under this alternative, but not avoided. While this alternative would reduce operational NO_x emissions as compared to the proposed Project, this alternative still would result in emissions of a criteria pollutant for which the region is non-attainment (i.e., ozone precursors), but to a lesser degree than the proposed Project.

Based on the analysis contained in the 2008 MND and its associated Addenda (SCH No. 2008101041), and assuming mandatory implementation of the Mitigation Measures and Conditions of Approval associated with the approved entitlements, impacts to nearby sensitive receptors would be less than significant under this alternative. Near- and long-term air emissions under this alternative would be below the SCAQMD regional and localized thresholds of significance with mitigation, and diesel particulate emissions would not expose sensitive receptors to significant cancer risks. Due to the reduced intensity of construction activities and reduced operational traffic associated with this alternative as compared to the proposed Project, air quality impacts affecting sensitive receptors would be reduced under this alternative. Neither this alternative nor the proposed Project would result in significant human health risks associated with air pollutant emissions.

Odors that would be associated with the No Project/Industrial Building Alternative would be associated with near-term construction activities and diesel exhaust that would occur under both near-term construction and long-term operation. However, and as concluded in the MND and Addendum No. 2 (SCH No. 2008101041), impacts due to odors would be less than significant due to the short-term duration and quantity of emissions, the predominantly industrial nature of the

surrounding area, and the less than significant results of the localized significance threshold analysis. Similarly, because the proposed Project does not involve any land uses that would generate odors, and since odors under near-term construction activities would be similar (particularly when asphalt is being installed), near- and long-term odors would be similar and less than significant under both this alternative and the proposed Project.

❑ Greenhouse Gas Emissions

Impacts due to GHG emissions were not previously evaluated in the approved MND for the proposed 181,031 s.f. building, although an impact analysis was conducted for the expanded trailer parking area in the northern portion of the site for Addendum No. 2. Addendum No. 2 concluded that impacts associated with the parking area would not result in substantial amount of GHG emissions. The No Project/Industrial Building Alternative would involve the construction and operation of a 181,031 s.f. industrial warehouse building and a truck trailer parking area. Due to the decrease in the amount of traffic associated with this alternative (743 fewer average daily trips), and the reduced building area (219,099 s.f. less building area than the proposed Project), this alternative would generate fewer GHG emissions as compared to the proposed Project. It should be noted that the Mitigation Measures identified to address the Project's GHG emissions would not be implemented as part of this alternative. Nonetheless, impacts due to GHG emissions would be reduced under this alternative as compared to the proposed Project, and would be less than significant.

Mitigation Measures and Conditions of Approval associated with PA07-0165, PA07-0167, and P12-061 would apply to this alternative, including Mitigation Measures and Conditions of Approval imposed to address air quality emissions. Incorporation of these measures is anticipated to reduce near- and long-term emissions of GHGs. As with the proposed Project, this alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, including the CARB Scoping Plan recommended measures and actions or the GHG emission reduction strategies set forth in the 2006 CAT Report. As such, impacts due to a conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases would be similar under both this alternative and the proposed Project.

❑ Noise

Noise associated with the No Project/Industrial Building Alternative would occur during near-term construction activities and under long-term operation. Similar to the proposed Project, near-term construction activities during each phase of construction would generate noise levels that exceed the City's Noise Ordinance standard of 65 dBA at a distance of 200 feet from the property line. However, due to the reduction in building area associated with this alternative, the duration of construction-related noise impacts would be reduced in comparison to the proposed Project.

Under long-term operational conditions, noise generated by the No Project/Industrial Building Alternative primarily would be associated with trucks maneuvering and idling within the dock areas. Mitigation Measures and Conditions of Approval associated with PA07-0167 and P12-061 would apply to this alternative, including requirements to construct noise attenuation walls along the perimeter of the site and to construct access gates with solid materials to address on-site noise generation. With implementation of the Mitigation Measures and Conditions of Approval, site operational noise affecting nearby sensitive receptors would be below the City's 65 dBA CNEL exterior standard and impacts would be less than significant. Because the intensity of operations

associated with this alternative would be reduced in comparison to the proposed Project, operational-related noise impacts would be less under this alternative, but still less than significant for both this alternative and the proposed Project.

Because the trailer parking lot in the northern portion of the property would not result in an increase in traffic, potential off-site noise impacts associated with traffic would be limited to the 323 vehicle trips per day generated by the 181,031 s.f. building. Based on the analysis presented in the MND, the total off-site contribution to noise levels along nearby roadway segments would be between 0.1 to 1.3 decibels (which includes traffic associated with the existing 676,960 s.f. warehouse building on the parcel to the west). This level of noise increase is well below the City's significance threshold. Since the proposed Project would result in off-site noise impacts ranging from 0.0 dBA CNEL to 1.6 dBA CNEL, off-site noise impacts would be reduced under this alternative, although would not be significant under either this alternative or the proposed Project.

Near-term ground-borne vibration or ground-borne noise effects would be temporary and infrequent during construction and would be less than significant under both the No Project/Industrial Building Alternative and the proposed Project. Under long-term operational conditions, there would be no sources of ground-borne vibration or ground-borne noise associated with either the No Project/Trailer Yard Alternative or the proposed Project. Also, neither this alternative nor the proposed Project are noise-sensitive uses or involve an air travel component. Thus, there would be no impact associated with public or private airport usage with either the No Project/Trailer Yard Alternative or the proposed Project.

❑ Transportation and Traffic

The No Project/Industrial Building Alternative would result in the construction of a 181,031 s.f. industrial warehouse building on the southern portion of the site, which would result in the generation of approximately 323 average daily vehicle trips. There would be no increase in traffic associated with the truck trailer parking area. As determined by the MND and Addendum No. 2, implementation of this alternative would result in significant but mitigable cumulative impacts to a total of nine intersections. The proposed Project would result in cumulatively significant impacts to a total of seven roadway segments and five intersections under Opening Year Cumulative (2017) conditions and impacts to two of the intersections would be significant and unavoidable. In comparison, implementation of the No Project/Industrial Building Alternative would reduce impacts to transportation/traffic as compared to the proposed Project and eliminate the Project's significant and unavoidable cumulative traffic impacts.

As concluded in the MND and Addendum No. 2, the No Project/Industrial Building Alternative would result in cumulatively significant but mitigable impacts to two CMP facilities (I-215 SB Ramp at Oleander Avenue and I-215 NB Ramp at Oleander Avenue). Implementation of the proposed Project would result in cumulatively significant but mitigable impacts to two CMP facilities (I-215 SB Ramps at Harley Knox Boulevard and I-215 NB Ramps at Harley Knox Boulevard). Accordingly, impacts to CMP facilities would be the same under this alternative and the proposed Project.

Neither the No Project/Industrial Building Alternative nor the proposed Project has the potential to affect air traffic patterns. As such, impacts to air traffic patterns would not occur, and would be similar under either this alternative or the proposed Project.

Under both the No Project/Industrial Building Alternative and the proposed Project, roadway frontage improvements would be required to adhere to City requirements, thereby precluding the potential for introducing hazards due to a design feature. Additionally, because both the proposed Project and No Project/Industrial Building Alternative would involve industrial-related uses, and the site is located within a predominantly industrial area, there would be no transportation design hazard impacts due to incompatible uses. In both cases, impacts would be less than significant under both the No Project/Industrial Building Alternative and the proposed Project.

Both the No Project/Industrial Building Alternative and the proposed Project would be served by a minimum of two access points, which would provide for adequate emergency access. Accordingly, an impact due to inadequate emergency access would not occur, and such impacts would be identical under either the proposed Project or No Project/Industrial Building Alternative.

Frontage improvements along San Michele Road and Perris Boulevard would occur under both the No Project/Industrial Building Alternative and the proposed Project, and would accommodate all required sidewalks, bike lanes, and bus turnouts. There are no other pedestrian, bicycle, or public transit facilities planned near the proposed Project site (with exception of the bus turnout). Accordingly, impacts due to a conflict with adopted policies or programs regarding public transit, bicycle, and pedestrian facilities would be the same under this alternative and the proposed Project, and no impact would occur.

❑ Biological Resources

This alternative would result in full disturbance of the property, as would occur under the proposed Project. As such, impacts to biological resources that would occur under this alternative are the same as those impacts described in EIR Subsection 4.5 for the proposed Project. No biological resource impacts would be reduced or avoided.

❑ Conclusion

Implementation of the No Project/Industrial Building Alternative would result in constructing a truck trailer parking lot on the northern portion of the property and constructing a 181,031 s.f. industrial warehouse building on the southern portion of the property in accordance with existing, approved entitlements. Implementation of this alternative would avoid the Project's significant unavoidable impact to transportation/traffic, and would generally reduce many of the other Project-related impacts that are related to building intensity. However, this alternative would reduce, but would not fully avoid, the proposed Project's impacts due to long-term operational-related emissions of NO_x, and would reduce but not fully avoid the proposed Project's significant unavoidable impact due to construction-related noise.

The No Project/Industrial Building Alternative would meet most of the Project's objectives, but generally to a lesser degree. This alternative would not achieve the Project's objective to achieve a minimum FAR of 0.5, and would be less effective in providing logistics center warehouse building space in comparison to the proposed Project. This alternative, while providing logistics center

warehouse building space within five miles of major regional transportation corridors, would provide less building space than the proposed Project. Additionally, this alternative would attract fewer businesses and jobs to the City of Moreno Valley as compared to the proposed Project. Moreover, selection of the No Project/Industrial Building Alternative, while limiting the size of the on-site logistics center warehouse building, would not result in a reduction in demand for industrial business park development in western Riverside County; thus, it is likely for a portion of the Project's environmental impacts to occur elsewhere rather than be avoided.

6.3.3 ALTERNATIVE 3 – REDUCED PROJECT/SMALL BUILDINGS ALTERNATIVE

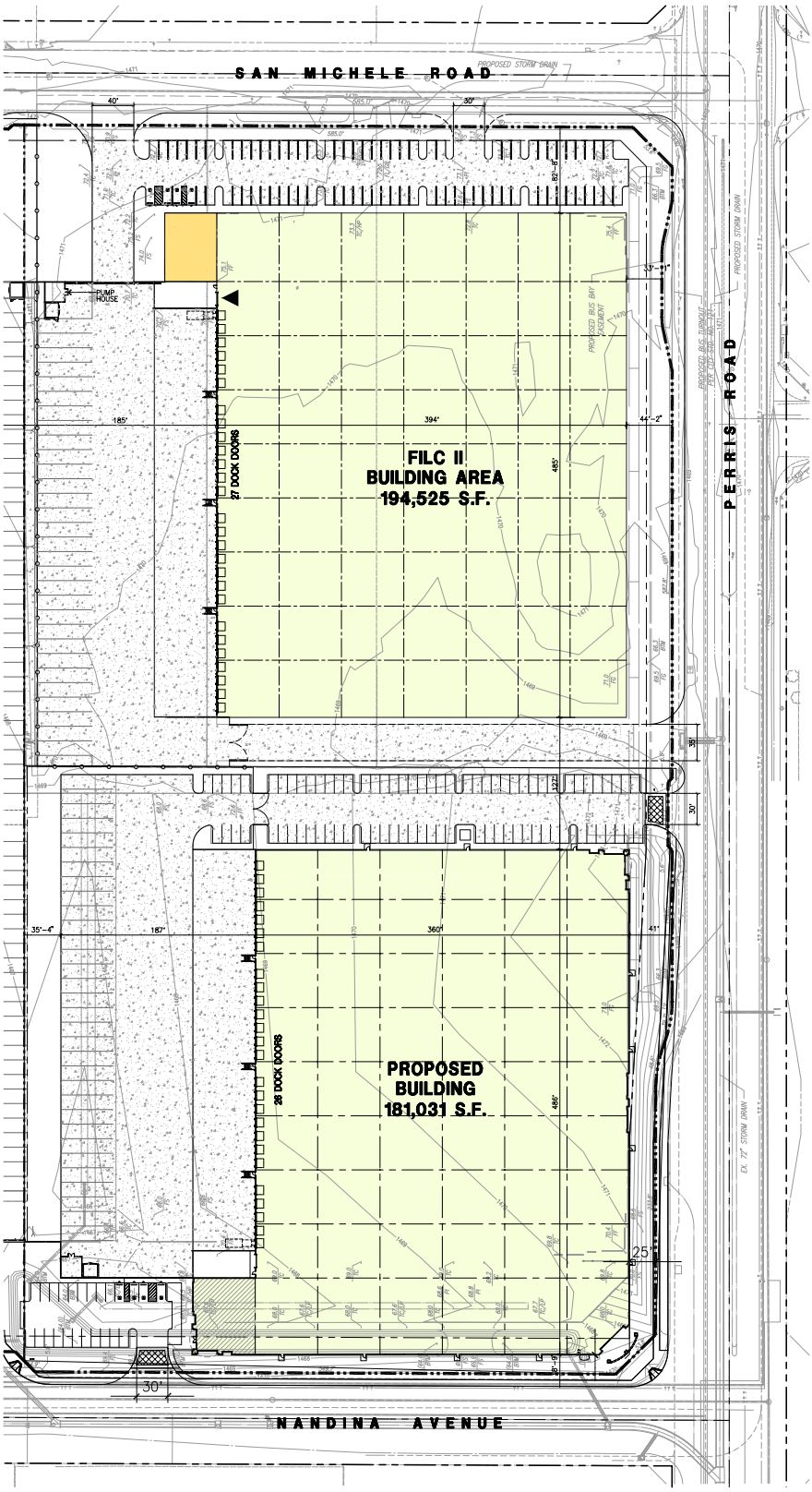
The Reduced Project/Small Buildings Alternative was selected to evaluate the comparative environmental benefits of constructing two smaller industrial warehouse buildings on-site in lieu of the single large building proposed by the Project. Under this alternative, two buildings would be constructed, with the northern building comprising approximately 194,525 s.f. of building area and the southern building comprising approximately 181,031 s.f. of building area. The southern building would consist of a 173,031 s.f. warehouse, 2,000 s.f. of mezzanine space, and a 6,000 s.f. office. The northern building would consist of 189,525 s.f. of warehouse space and 5,000 s.f. of office space. The two buildings, combined, would include 375,556 s.f. of building area, or 24,574 s.f. less building area than the proposed Project (a reduction in building area by approximately 6%). Figure 6-3, *Reduced Project/Small Buildings Alternative*, depicts a conceptual site plan for the Reduced Project/Small Buildings Alternative.

Roadway improvements and access points would be identical to the proposed Project under this alternative, except that an additional access would be provided to Perris Boulevard on the north side of the southern building. The existing screen walls would be extended under this alternative and would occur along the entire frontage with Perris Boulevard and San Michele Road, while the screen walls along Nandina Avenue would be demolished and replaced along the northern edge of the employee parking area proposed adjacent to Nandina Avenue.

The industrial buildings proposed under this alternative would include a total of 55 dock doors, 62 truck trailer parking stalls, and 193 standard and handicap spaces.

❑ Air Quality

The Reduced Project/Small Buildings Alternative would not alter the land uses allowed on-site under the General Plan and zoning designations. The development of industrial buildings on-site would be consistent with the site's existing General Plan and zoning designations that formed the basis for regional population projections used in SCAG's AQMP. As such, the Reduced Project/Small Buildings Alternative would not conflict with implementation of the AQMP, and no impact would occur. Because the proposed Project also would be consistent with the site's existing General Plan and zoning land use designations and would be consistent with the regional population projections used in the AQMP, impacts due to a conflict with the applicable AQMP would be the same under both the proposed Project and the Reduced Project/Small Buildings Alternative.



Source: HPA Architects (10-23-12)

FIGURE 6-3
Reduced Project/Small Building Alternative

Under the Reduced Project/Small Buildings Alternative, activities involved in demolishing the existing parking lot and building the two small buildings would result in construction emissions very similar to that of the proposed Project. Although this alternative would result in a reduction in building area, this alternative would require the construction of more walls for the individual buildings and would require more area requiring paint, thereby increasing the emission of VOCs under near-term conditions. As with the proposed Project, this alternative would require mitigation measures to reduce near-term emissions of ROGs and NO_x to a level below significant. With the required mitigation, neither this alternative nor the proposed Project would result in a violation of an air quality standard or contribution to a projected air quality violation, although near-term construction emissions would slightly increase under this alternative as compared to the proposed Project.

The new 181,031 s.f. building and 194,525 s.f. building would generate approximately 1,336 trips per day (utilizing the ITE rates for industrial warehousing). Because the buildings would not qualify as "high cube" due to their small size, the trip rate per square foot is higher than the proposed Project. The projected increase in traffic from the site would require the implementation of mitigation measures and City issued conditions of approval. However, even with the incorporation of mitigation measures, the 1,336 daily trips associated with this alternative would result in significant and unavoidable impacts due to the emissions of NO_x, which would violate the SCAQMD regional air quality standard and would contribute to an existing air quality violation (i.e., smog). Since the proposed Project would generate 270 fewer daily trips than would occur under this alternative, impacts due to a conflict with the SCAQMD regional air quality standard and the level of contribution to an existing air quality violation (i.e., ozone) would be increased under this alternative. Accordingly, this alternative would increase the proposed Project's significant and unavoidable impact due to operational NO_x emissions.

As with the proposed Project, and assuming mandatory implementation of similar mitigation measures and conditions of approval, impacts to nearby sensitive receptors would be less than significant under this alternative. Emissions under this alternative would be below the SCAQMD regional and localized thresholds of significance, and diesel particulate emissions would not expose sensitive receptors to significant cancer risks. However, these less than significant impacts to sensitive receptors would be increased under this alternative in comparison to the proposed Project due to the increase in daily vehicular trips (i.e., 1,336 average daily trips, as compared to 1,066 average daily trips under the proposed Project).

Odors that would be associated with the Reduced Project/Small Buildings Alternative would be associated with near-term construction activities and diesel exhaust that would occur under both near-term construction and long-term operation. However, and similar to the proposed Project, impacts due to odors under this alternative would be less than significant due to the short-term duration and quantity of emissions, the predominantly industrial nature of the surrounding area, and the less-than-significant results of the localized significance threshold analysis. Since this alternative and the proposed Project do not involve any land uses that would generate odors, and since odors under near-term construction activities would be similar (particularly when asphalt is being installed), near- and long-term odors would be similar under both this alternative and the proposed Project, and would be less than significant.

❑ Greenhouse Gas Emissions

The Reduced Project/Small Buildings Alternative would involve the construction and operation of 375,556 s.f. of industrial warehouse building area in two buildings. Due to the slight increase in the amount of traffic associated with this alternative (270 additional average daily trips), mobile-source related GHG emissions would increase as compared to the proposed Project. However, since this alternative would involve less building area, non-mobile source operational GHG emissions could be reduced under this alternative. Nonetheless, because the majority of GHG emissions are associated with vehicle sources, total GHGs generated under this alternative would be greater than those associated with the proposed Project.

Mitigation measures and conditions of approval similar to those applied to the proposed Project would apply to this alternative, including those imposed to address air quality emissions. Incorporation of these measures is anticipated to reduce near- and long-term emissions of GHGs. As with the proposed Project, it is not anticipated that this alternative would conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, including the CARB Scoping Plan recommended measures and actions or the GHG emission reduction strategies set forth in the 2006 CAT Report. As such, impacts due to a conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases would be similar under both this alternative and the proposed Project and would be less than significant.

❑ Noise

Noise associated with the Reduced Project/Small Buildings Alternative would occur during near-term construction activities and under long-term operation. Similar to the proposed Project, near-term construction activities during each phase of construction would generate noise levels that exceed the City's Noise Ordinance standard of 65 dBA at a distance of 200 feet from the property line. Since this alternative would result in the construction of two buildings instead of one, it is anticipated that the duration of noise impacts during the building construction and architectural coating phase would increase under this alternative as compared to the proposed Project. Accordingly, implementation of this alternative would result in a near-term significant and unavoidable impact to noise, and such impacts would be slightly increased as compared to the proposed Project.

Under long-term operational conditions, noise generated by the Reduced Project/Small Buildings Alternative primarily would be associated with trucks maneuvering and idling within the dock areas. Perimeter walls would act as noise barriers and contain operational noise and nearby sensitive receptors would experience noise levels below the City's 65 dBA CNEL exterior standard. As such, impacts would be less than significant. Noise levels may be increased compared to the proposed Project, however, due to the 270 vehicle increase in average daily traffic associated with this alternative.

Off-site transportation related impacts are not anticipated to be significant in association with this alternative. However, since this alternative would result in 270 more average daily vehicle trips as compared to the proposed Project, off-site noise impacts would increase under this alternative in comparison to the proposed Project, but would remain below a level of significance.

Near-term ground-borne vibration or ground-borne noise effects would be temporary and infrequent during construction and would be less than significant under both this alternative and the proposed Project. Under long-term operational conditions, there would be no sources of ground-borne vibration or ground-borne noise associated with either the Reduced Project/Small Buildings Alternative or the proposed Project. Also, neither this alternative nor the proposed Project are noise-sensitive uses or involve an air travel component. Thus, there would be no impact associated with public or private airport usage with either the Reduced Project/Small Buildings Alternative or the proposed Project.

❑ Transportation and Traffic

The Reduced Project/Small Buildings Alternative would result in the construction and operation of 375,556 s.f. of industrial warehouse building area, which would result in the generation of approximately 1,336 average daily vehicle trips (utilizing the ITE rates for industrial warehousing). Due to the increase in traffic associated with this alternative (i.e., 1,336 average daily trips, as compared to 1,066 average daily trips for the proposed Project), it can reasonably be assumed that this alternative would result in similar or increased impacts at the seven roadway segments and five intersections that would be significantly and cumulatively impacted by the proposed Project under Horizon Year Cumulative (2017) conditions. Cumulative impacts at the intersections of Western Way/ Harley Knox Boulevard and Indian Street/ Harley Knox Boulevard would remain significant and unavoidable under both this alternative and the proposed Project, although this alternative would produce more traffic and would therefore have a greater on these intersections. Therefore, implementation of the Reduced Project/Small Buildings Alternative would increase impacts to transportation/traffic as compared to the proposed Project.

Implementation of the Reduced Project/Small Buildings Alternative would likely impact the same CMP facilities as the proposed Project (I-215 SB Ramps at Harley Knox Boulevard and I-215 NB Ramps at Harley Knox Boulevard); however, such impacts would be increased because this alternative would produce 270 more average daily trips than the proposed Project. Accordingly, impacts to CMP facilities would increase under this alternative as compared to the proposed Project, although such impacts would be reduced to a level below significant through the payment of DIF and/or TUMF fees in either case.

Neither the Reduced Project/Small Buildings Alternative nor the proposed Project has the potential to affect air traffic patterns. As such, impacts to air traffic patterns would not occur, and would be similar under either this alternative or the proposed Project.

Under both the Reduced Project/Small Buildings Alternative and the proposed Project, roadway frontage improvements would be required to adhere to City requirements, thereby precluding the potential for introducing hazards due to a design feature. Additionally, because both the proposed Project and Reduced Project/Small Buildings Alternative would involve industrial-related uses, and the site is located within a predominantly industrial area, there would be no impacts due to incompatible uses. In both cases, impacts would be similar under both the Reduced Project/Small Buildings Alternative and the proposed Project and would not be significant.

Both the Reduced Project/Small Buildings Alternative and the proposed Project would be served by a minimum of two access points, which would provide for adequate emergency access. Accordingly,

an impact due to inadequate emergency access would not occur, and such impacts would be identical under either the proposed Project or Reduced Project/Small Buildings Alternative.

Frontage improvements along San Michele Road and Perris Boulevard would occur under both the Reduced Project/Small Buildings Alternative and the proposed Project, and would accommodate all required sidewalks, bike lanes, and bus turnouts. There are no other pedestrian, bicycle, or public transit facilities planned near the proposed Project site (with exception of the bus turnout). Accordingly, impacts due to a conflict with adopted policies or programs regarding public transit, bicycle, and pedestrian facilities would be identical under this alternative and the proposed Project, and no impact would occur.

❑ Biological Resources

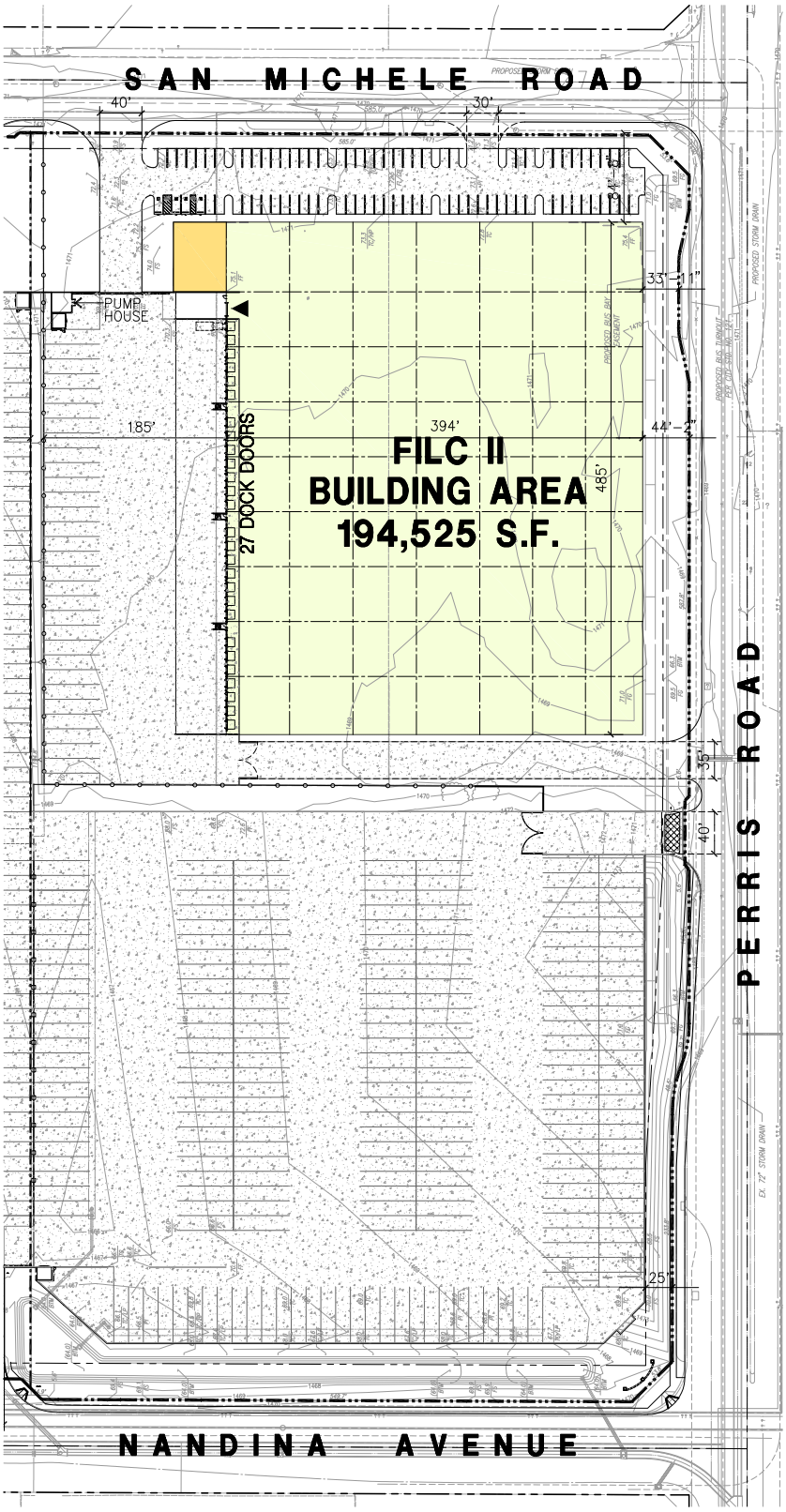
This alternative would result in full disturbance of the property, as would occur under the proposed Project. As such, impacts to biological resources that would occur under this alternative are the same as those impacts described in EIR Subsection 4.5 for the proposed Project. No biological resource impacts would be reduced or avoided.

❑ Conclusion

Implementation of the Reduced Project/Small Buildings Alternative would result in the construction of 375,556 s.f. of industrial warehouse building area, or 24,574 s.f. less building area than the proposed Project (a reduction in building area by approximately 6%). Implementation of this alternative would increase the proposed Project's significant unavoidable impacts to air quality, noise, and transportation/traffic, and would generally increase Project-related operational impacts that are related to average daily traffic. The Reduced Project/Small Buildings Alternative would meet all of the Project's objectives, except may have more difficulty meeting the objective to construct a logistics center that appeals to tenants seeking to locate in the Moreno Valley area due to the smaller sized buildings as compared to the larger building proposed by the Project.

6.3.4 ALTERNATIVE 4 – REDUCED PROJECT/NORTH BUILDING ALTERNATIVE

The Reduced Project/North Building Alternative was selected to evaluate the comparative environmental benefits of constructing one smaller industrial warehouse building on the northern portion of the property and retaining the existing truck trailer yard in the southern portion of the site, in lieu of constructing the single large building proposed by the Project. Under this alternative, a single 194,525 s.f. building would be constructed in the northern portion of the site, while the existing truck trailer parking area in the south would be retained. The building would consist of 189,525 s.f. of warehouse space and 5,000 s.f. of office space. Implementation of this alternative would reduce the allowable building area on-site by 205,605 s.f., or approximately 51% less building area than the proposed Project. Figure 6-4, *Reduced Project/North Building Alternative*, depicts a conceptual site plan for the No Project/North Building Alternative.



Source: HPA Architects (10-23-12)

FIGURE 6-4
Reduced Project/North Building Alternative

Roadway improvements and access points would be identical to the proposed Project under this alternative, except that an additional access would be provided to Perris Boulevard on the north side of the existing truck trailer parking area. The existing screen walls would be extended under this alternative and would occur along the entire frontage with Perris Boulevard and San Michele Road, while the screen walls along Nandina Avenue would be demolished and replaced along the northern edge of the employee parking area proposed adjacent to Nandina Avenue.

The industrial building proposed under this alternative would include a total of 28 dock doors, 243 truck trailer parking stalls, and 87 standard and handicap spaces.

❑ Air Quality

The Reduced Project/North Building Alternative would not alter the land uses allowed on-site under the General Plan and zoning designations. The development of an industrial building on-site would be consistent with the site's existing General Plan and zoning designations that formed the basis for regional population projections used in SCAG's AQMP. As such, the Reduced Project/North Building Alternative would not conflict with implementation of the AQMP, and no impact would occur. Because the proposed Project also would be consistent with the site's existing General Plan and zoning land use designations and would be consistent with the regional population projections used in the AQMP, impacts due to a conflict with the applicable AQMP would be the same under both the proposed Project and the Reduced Project/North Building Alternative.

Under the Reduced Project/North Building Alternative, the extent of construction activities would be reduced as compared to the proposed Project; as such, construction-related air quality emissions would be lessened. As with the proposed Project, this alternative would require mitigation measures to reduce near-term emissions of VOCs and NO_x to a level below significant, but to a lesser degree. With required mitigation, neither this alternative nor the proposed Project would result in a violation of an air quality standard or contribution to a projected air quality violation, although near-term construction emissions would be reduced under this alternative as compared to the proposed Project.

The new 194,525 s.f. building would generate approximately 693 trips per day (utilizing the ITE rates for industrial warehousing). The projected increase in traffic from the site would require the implementation of mitigation measures and adherence to conditions of approval similar to those imposed for the proposed Project. However, even with the incorporation of mitigation measures, the 693 trips associated with this alternative would result in significant and unavoidable impacts due to the emissions of NO_x, which would violate the SCAQMD regional air quality standard and would contribute to an existing air quality violation (i.e., smog). Since the proposed Project would generate 373 more daily trips than would occur under this alternative, impacts due to a conflict with the SCAQMD regional air quality standard and the level of contribution to an existing air quality violation (i.e., ozone) would be reduced under this alternative. Accordingly, this alternative would reduce but not avoid the proposed Project's significant and unavoidable impact due to operational NO_x emissions.

As with the proposed Project, and assuming implementation of similar mitigation measures and conditions of approval, impacts to nearby sensitive receptors would be less than significant under this alternative. Emissions under this alternative would be below the SCAQMD regional and localized thresholds of significance, and diesel particulate emissions would not expose sensitive receptors to

significant cancer risks. These less than significant impacts to sensitive receptors would be reduced under this alternative in comparison to the proposed Project due to the reduction in daily vehicular trips (i.e., 693 average daily trips, as compared to 1,066 average daily trips under the proposed Project).

Odors that would be associated with the Reduced Project/North Building Alternative would be associated with near-term construction activities and diesel exhaust that would occur under both near-term construction and long-term operation. However, and similar to the proposed Project, impacts due to odors under this alternative would be less than significant due to the short-term duration and quantity of emissions, the predominantly industrial nature of the surrounding area, and the less-than-significant results of the localized significance threshold analysis. Since this alternative and the proposed Project do not involve any land uses that would generate odors, and since odors under near-term construction activities would be similar (particularly when asphalt is being installed), near- and long-term odors would be similar under both this alternative and the proposed Project, and would be less than significant.

❑ Greenhouse Gas Emissions

The Reduced Project/North Building Alternative would involve the construction and operation of 194,525 s.f. of industrial warehouse building area. Due to the slight reduction in the amount of traffic associated with this alternative (373 fewer average daily trips), mobile-source related GHG emissions would decrease as compared to the proposed Project. Additionally, since this alternative would involve less building area, non-mobile source operational GHG emissions also would be reduced under this alternative.

Mitigation measures and conditions of approval similar to those applied to the proposed Project associated would apply to this alternative, including those imposed to address air quality emissions. Incorporation of these measures is anticipated to reduce near- and long-term emissions of GHGs. As with the proposed Project, it is not anticipated that this alternative would conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, including the CARB Scoping Plan recommended measures and actions or the GHG emission reduction strategies set forth in the 2006 CAT Report. As such, impacts due to a conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases would be similar under both this alternative and the proposed Project and would be less than significant.

❑ Noise

Noise associated with the Reduced Project/North Building Alternative would occur during near-term construction activities and under long-term operation. Similar to the proposed Project, near-term construction activities during each phase of construction would generate noise levels that exceed the City's Noise Ordinance standard of 65 dBA at a distance of 200 feet from the property line. Since this alternative would result in the construction of a smaller building on-site, it is anticipated that the duration of noise impacts during the building construction and architectural coating phase would be reduced under this alternative as compared to the proposed Project. However, implementation of this alternative would not fully avoid the proposed Project's near-term significant and unavoidable impact to noise.

Under long-term operational conditions, noise generated by the Reduced Project/North Building Alternative primarily would be associated with trucks maneuvering and idling within the dock areas. Mitigation measures and conditions of approval, including requirements to construct noise attenuation walls along the perimeter of the site and to construct access gates with solid materials to address on-site noise generation would be effective in containing operational noise. With implementation of similar mitigation measures and conditions of approval imposed on the proposed Project, site operational noise affecting nearby sensitive receptors would be below the City's 65 dBA CNEL exterior standard and impacts would be less than significant. Overall, operational noise impacts would be decreased as compared to the proposed Project due to the 373 vehicle fewer average daily trips associated with this alternative.

Off-site transportation related impacts would be less than significant in association with this alternative and the proposed Project. Since this alternative would result in 373 fewer average daily vehicle trips as compared to the proposed Project, off-site noise impacts would decrease under this alternative in comparison to the proposed Project.

Near-term ground-borne vibration or ground-borne noise effects would be temporary and infrequent during construction and would be less than significant under both this alternative and the proposed Project. Under long-term operational conditions, there would be no sources of ground-borne vibration or ground-borne noise associated with either the Reduced Project/North Building Alternative or the proposed Project. Also, neither this alternative nor the proposed Project are noise-sensitive uses or involve an air travel component. Thus, there would be no impact associated with public or private airport usage with either the Reduced Project/North Building Alternative or the proposed Project.

❑ Transportation and Traffic

The Reduced Project/North Building Alternative would retain the parking lot in the southern portion of the site and result in the construction and operation of a 194,525 s.f. industrial warehouse building in the northern portion of the site, which would result in the generation of approximately 693 average daily vehicle trips (utilizing the ITE rates for industrial warehousing). It is anticipated that implementation of this alternative would result in cumulatively significant impacts at the same seven roadway segments and five intersections that would be impacted by the proposed Project under Horizon Year Cumulative (2017) conditions, although such impacts would be reduced in comparison to the proposed Project. Cumulative impacts at the intersections of Western Way/ Harley Knox Boulevard and Indian Street/ Harley Knox Boulevard would remain significant and unavoidable under both this alternative and the proposed Project, although this alternative would produce less traffic and would therefore have a lesser degree of cumulative impact at these intersections.

Implementation of the Reduced Project/North Building Alternative would likely impact the same CMP facilities as the proposed Project (I-215 SB Ramps at Harley Knox Boulevard and I-215 NB Ramps at Harley Knox Boulevard); however, such impacts would be reduced since this alternative would produce 373 fewer average daily trips than the proposed Project. Accordingly, impacts to CMP facilities would be reduced under this alternative as compared to the proposed Project, and such impacts would be reduced to a level below significant through the payment of DIF and/or TUMF fees.

Neither the Reduced Project/North Building Alternative nor the proposed Project has the potential to affect air traffic patterns. As such, impacts to air traffic patterns would not occur, and would be similar under either this alternative or the proposed Project.

Under both the Reduced Project/North Building Alternative and the proposed Project, roadway frontage improvements would be required to adhere to City requirements, thereby precluding the potential for introducing hazards due to a design feature. Additionally, because both the proposed Project and Reduced Project/North Building Alternative would involve industrial-related uses, and the site is located within a predominantly industrial area, there would be no impacts due to incompatible uses. In both cases, impacts would be similar under both the Reduced Project/North Building Alternative and the proposed Project and would not be significant.

Both the Reduced Project/North Building Alternative and the proposed Project would be served by a minimum of two access points, which would provide for adequate emergency access. Accordingly, an impact due to inadequate emergency access would not occur, and such impacts would be identical under either the proposed Project or Reduced Project/North Building Alternative.

Frontage improvements along San Michele Road and Perris Boulevard would occur under both the Reduced Project/North Building Alternative and the proposed Project, and would accommodate all required sidewalks, bike lanes, and bus turnouts. There are no other pedestrian, bicycle, or public transit facilities planned near the proposed Project site (with exception of the bus turnout). Accordingly, impacts due to a conflict with adopted policies or programs regarding public transit, bicycle, and pedestrian facilities would be identical under this alternative and the proposed Project, and no impact would occur.

❑ Biological Resources

This alternative would result in full disturbance of the property, as would occur under the proposed Project. As such, impacts to biological resources that would occur under this alternative are the same as those impacts described in EIR Subsection 4.5 for the proposed Project. No biological resource impacts would be reduced or avoided.

❑ Conclusion

Implementation of the Reduced Project/North Building Alternative would retain the existing truck trailer parking yard in the southern portion of the property and result in the construction of 194,525 s.f. of industrial warehouse building area in the northern portion of the property. This would result in 205,605 s.f. less building area than the proposed Project (a reduction in building area by approximately 51%). Implementation of this alternative would reduce the proposed Project's significant unavoidable impacts to air quality, noise, and transportation/traffic, although such impacts would not be fully avoided under this alternative. Other Project-related operational impacts that are related to average daily traffic also would be reduced under this alternative.

The Reduced Project/North Building Alternative would meet most of the Project's objectives, but generally to a lesser degree. This alternative would not achieve the Project's objective to achieve a minimum FAR of 0.5, and would be less effective in providing logistics center warehouse building space in comparison to the proposed Project. This alternative, while providing logistics center warehouse building space within five miles of major regional transportation corridors, would provide

less building space than the proposed Project. Additionally, this alternative would attract fewer businesses and jobs to the City of Moreno Valley as compared to the proposed Project. Moreover, selection of the Reduced Project/North Building Alternative would not result in a reduction in demand for industrial business park development in western Riverside County; thus, it is likely for a portion of the Project's environmental impacts to occur elsewhere rather than be avoided.

Table 6-1 Alternatives – Comparison of Environmental Effects

ENVIRONMENTAL TOPIC	PROPOSED PROJECT SIGNIFICANCE OF IMPACTS AFTER MITIGATION	LEVEL OF IMPACT COMPARED TO THE PROPOSED PROJECT			
		NO PROJECT/ TRAILER YARD ALTERNATIVE	NO PROJECT/ INDUSTRIAL BUILDING ALTERNATIVE	REDUCED PROJECT/ SMALL BUILDINGS ALTERNATIVE	REDUCED PROJECT/ NORTH BUILDING ALTERNATIVE
Air Quality – Construction	Less than Significant	Reduced	Reduced	Increased	Reduced
Air Quality - Operational	Significant and Unavoidable	Reduced and Avoided	Reduced but Not Avoided	Increased	Reduced but Not Avoided
Greenhouse Gas Emissions	Less than Significant	Reduced	Reduced	Increased	Reduced
Noise - Construction	Significant and Unavoidable	Reduced but Not Avoided	Reduced but Not Avoided	Increased	Reduced but Not Avoided
Noise - Operational	Less than Significant	Reduced	Reduced	Increased	Reduced
Transportation/ Traffic - Operational	Significant and Unavoidable	Reduced and Avoided	Reduced but Not Avoided	Increased	Reduced but Not Avoided
Biological Resources	Less than Significant	Same	Same	Same	Same
ABILITY TO MEET THE BASIC OBJECTIVES OF THE PROJECT[1]					
Objective A:		No	Yes, but to a lesser degree	Yes, but to a lesser degree	Yes, but to a lesser degree
Objective B:		No	Yes, but to a lesser degree	Yes, but to a lesser degree	Yes, but to a lesser degree
Objective C:		No	No	Yes, but to a lesser degree	Yes, but to a lesser degree
Objective D:		No	Yes, but to a lesser degree	Yes	Yes, but to a lesser degree
Objective E:		No	Yes, but to a lesser degree	Yes, but to a lesser degree	Yes, but to a lesser degree

1. Refer to EIR Subsection 6.3 for a list of the proposed Project's basic objectives.

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7.1.1 CITY OF MORENO VALLEY COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

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7.5 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the First Inland Logistics Center II EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the City of Moreno Valley Community and Economic Development Department, Planning Division, 14177 Frederick Street, Moreno Valley, California, 92552.

Appendix A Initial Study for First Inland Logistics Center II, Notice of Preparation, and Written Comments.

Appendix B Urban Crossroads, Inc. 2012a. *First Inland Logistics Center II Air Quality Impact Analysis*. November 14, 2012.

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Appendix G1 URS Corporation. 2012b. 2012 Protocol Burrowing Owl Survey – San Michele Property Project, City of Moreno Valley, Riverside County, California. June 29, 2012.

Appendix G2 URS Corporation. 2012c. 2012 Special-Status Plant Survey Results – San Michele Property Project, City of Moreno Valley, Riverside, California. June 29, 2012.

Appendix H Southern California Geotechnical. 2012. Supplementary Geotechnical Investigation Proposed Building 4 - Nandina III and IV. January 12, 2012.

Appendix I URS Corporation. 2012e. Phase I Environmental Site Assessment – Daniel's Property, Southwest Corner of San Michele Road and Perris Boulevard, Moreno Valley, CA. January 23, 2012.