

# CEQA Initial Study

**Moreno Valley Logistics Center**  
Lead Agency: City of Moreno Valley

**City of Moreno Valley**  
**Planning Division**  
**P.O. Box 88005**  
**Moreno Valley, CA 92552**  
**6/17/2015**

# **City of Moreno Valley**

## **California Environmental Quality Act (CEQA) Initial Study**

### **MORENO VALLEY LOGISTICS CENTER**

#### Lead Agency

City of Moreno Valley  
Community & Economic Development Department  
Planning Division  
14177 Frederick Street  
P.O. Box 88005  
Moreno Valley, California 92552

#### Project Applicant

Prologis L.P.  
2817 E. Cedar Street Suite 200  
Ontario, CA 91761

#### CEQA Consultant

T&B Planning, Inc.  
17542 East 17<sup>th</sup> Street, Suite 100  
Tustin, California 92780

#### Lead Agency Discretionary Permits

Specific Plan Amendment (P15-036), Tentative Parcel Map (PA15-0018); Plot Plan (PA15-0014),  
Plot Plan (PA15-0015), Plot Plan (PA15-0016), and Plot Plan (PA15-0017)

June 17, 2015

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## **1.0 INTRODUCTION**

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# 1.0 INTRODUCTION

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## *1.1 Document Purpose and Scope*

The California Environmental Quality Act (CEQA) is a statewide environmental law contained in Public Resources Code §§21000-21177. CEQA applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies analyze and acknowledge the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts to the environment when avoidance or reduction is feasible. The CEQA compliance process also gives other public agencies, interested parties, and the general public an opportunity to comment on a proposed project's environmental effects.

This Initial Study (IS) assesses the potential of the proposed Moreno Valley Logistics Center project (the "Project") to impact the physical environment. The Project involves the construction and operation of a warehouse distribution center with four (4) buildings providing 1,737,518 s.f. of total building space. Associated improvements to the property would include loading docks, surface parking areas (automobile parking and truck trailer parking), drive aisles, roadway improvements, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins. The Project site is located within the boundary of the Moreno Valley Industrial Area Plan (MVIAP) (Specific Plan 208).

As part of the City of Moreno Valley's permitting process, the proposed Project is required to undergo an initial environmental review pursuant to §15063 of the CEQA Guidelines. This IS is a preliminary analysis prepared by the City of Moreno Valley Department of Community & Economic Development, Planning Division, acting in its capacity as the CEQA Lead Agency, to determine the level of environmental review and analysis that will be required for the Project. The results of the IS determine which type of CEQA compliance document will be prepared, which could consist of either an environmental impact report (EIR); mitigated negative declaration (MND); negative declaration (ND); addendum to a previously-prepared EIR; or a tiered analysis that relies on the findings and conclusions of a previously-prepared EIR. If the IS concludes, based on substantial evidence in the City's records, that the Project has the potential to result in a significant effect on the environment that cannot be avoided, reduced, or mitigated to below stated thresholds of significance, the City of Moreno Valley is required to prepare an EIR.

This IS is an informational document that provides the City of Moreno Valley, other public agencies, interested parties, and the public at-large with an objective assessment of the potential environmental impacts that could result from implementation of the proposed Project.

## ***1.2 Potential Environmental Effects***

The analysis presented in this IS indicates that the proposed Project has the potential to result in one or more significant direct, indirect, and/or cumulative environmental effects to the following environmental subjects:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Noise
- Transportation/Traffic
- Mandatory Findings of Significance

Based on the analysis provided in the Environmental Checklist portion of this IS, the proposed Project has the potential to result in significant effects on the environment for which feasible mitigation measures may not be available to reduce all of those effects to below thresholds of significance applied by the City of Moreno Valley. Accordingly, and pursuant to §15063(b)(1) of the CEQA Guidelines, an EIR will be prepared for the Project and will focus on the subjects listed above.

## ***1.3 Document Organization***

This IS includes the following sections:

- Section 1.0, Introduction, provides information about CEQA and its requirements for environmental review and explains that an EIR will be prepared by the City of Moreno Valley to evaluate the proposed Project's potential to impact the physical environment.
- Section 2.0, Project Description and Setting, provides information about the proposed Project's location and planning objectives and includes a description of the proposed Project's physical features and construction and operational characteristics.
- Section 3.0, Environmental Checklist, includes the Environmental Checklist and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment.
- Section 4.0, References, provides reference information for all information sources consulted during the preparation of this IS.

## **2.0 PROJECT DESCRIPTION AND SETTING**

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## **2.0 PROJECT DESCRIPTION AND SETTING**

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### **2.1 Project Overview**

The proposed Project involves the development of an approximately 89.4 gross-acre property located at the southwest corner of the intersection of Krameria Avenue and Indian Street in the City of Moreno Valley, Riverside County, California. Development of the property would involve the construction and operation of a warehouse distribution center with one (1) high cube warehouse building and three (3) light industrial buildings. The Project Applicant is pursuing the Project on a speculative basis, meaning that the proposed buildings' future tenants are not yet identified. Additional details regarding the Project's location, environmental setting, and design are included in this Section, on the following pages.

### **2.2 Project Background**

The Project site is located within the geographical limits of the Moreno Valley Industrial Area Plan (MVIAP) (Specific Plan (SP) 208). The MVIAP was originally referred to as the Oleander Specific Plan when first approved by the City of Moreno Valley in 1989. The Specific Plan was renamed the MVIAP in 2001 after 40 acres of additional area was added to the Specific Plan boundaries, bringing the total land area within the MVIAP to 1,540 acres. The City amended the MVIAP again in 2002 to consolidate the "Business Park," "Mixed Use," "Light Industry," and "Heavy Industry" land use designations of the original Specific Plan as a single "Industrial" land use designation in order to more readily accommodate and attract economic development opportunities (Moreno Valley, 2002). The pace of industrial development and economic activity in the MVIAP area was very slow until about 2007 when the warehouse distribution industry began to locate distribution warehouse and e-commerce facilities in the MVIAP area. The MVIAP "Industrial" land use designation is applied to the approximately 89.4-acre Moreno Valley Logistics Center property, which is the subject of this IS.

The buildout of MVIAP, including the Project site, was the subject of previous environmental review under CEQA as part of an EIR certified in 1989 (State Clearinghouse Number 1988080813), which is herein incorporated by reference and is available for public review at the City of Moreno Valley Community & Economic Development Department, Planning Division.

This IS evaluates the potential environmental effects that could result from the implementation of applications for a Specific Plan Amendment (P15-036), Tentative Parcel Map (PA15-0018), and four individual Building Plot Plan applications (PA15-0014, PA15-0015, PA15-0016, and PA15-0017), which collectively propose to develop the subject property with a logistics center accommodating four buildings. The applications for the Project were submitted to the City of Moreno Valley in March 2015, as described below in Subsection 2.6.

### **2.3 Project Location**

The Project site is located in the southern portion of the City of Moreno Valley. The City of Moreno Valley is located in the northwestern portion of Riverside County, California, and is north of the City of Perris and southeast of the City of Riverside. As shown on Figure 2-1, *Regional Map*, the Project site is located approximately 1.3 miles east of Interstate 215 (I-215), 4.2 miles south of State Route

60 (SR-60), and 2.5 miles northwest of Lake Perris. At the local scale, the Project site is located south of Krameria Avenue, north of Cardinal Avenue, east of Heacock Street and the March Air Reserve Base, and west of Indian Street (see Figure 2-2, *Vicinity Map*). The Perris Valley Storm Drain Channel transects the Project site in a northwest to southeast direction. Approximately 15.3 acres of the Project site are located west of the Perris Valley Storm Drain Channel and approximately 74.1 acres of the Project site are located east of the Perris Valley Storm Drain Channel.

The site is located within the southwestern portion of Section 30, Township 3 South, Range 3 West (San Bernardino Base and Meridian) and includes Assessor Parcel Numbers (APN): 316-100-028, 316-100-030, 316-100-048, 316-100-051, and 316-100-052.

#### **2.4 Environmental Setting and Surrounding Land Uses**

As shown on Figure 2-3, *USGS Topographic Map*, the Project site is relatively flat with elevations ranging from 1,497 feet above mean sea level (AMSL) at its northern boundary to 1,468 AMSL at the southeast corner of the property. As shown on Figure 2-4, *Aerial Photograph*, the Project site consists of vacant, undeveloped land that is routinely disturbed (i.e., disced) as part of weed abatement activities. The Project site is transected in a northwest to southeast direction by the Perris Valley Storm Drain Channel.

The Project site is located in a portion of the City of Moreno Valley that is developing as a center for distribution warehousing, e-commerce, and light industrial land uses. Under existing conditions, the Project site is surrounded to the north and south by a mixture of industrial warehouse buildings and a few undeveloped and underutilized parcels that are designated by the MVIAP for future industrial development; to the west by March Air Reserve Base, and to the east by a single-family residential neighborhood (refer to Figure 2-5, *Surrounding Land Uses*). Land uses surrounding the Project site include the following:

North: The Project site is bordered by vacant, undeveloped land on the northwest and a large warehouse building on the northeast currently occupied by Proctor & Gamble. The vacant, undeveloped land located northwest of the Project site is approved for future development as a warehouse distribution center (March Business Center). Located farther north of the Project site is Iris Avenue, undeveloped land, and residential development. Approximately 0.6-mile northeast of the Project site is Rainbow Ridge Elementary School and March Middle School.

South: The Project site is bordered on the south by partially developed Cardinal Avenue, a large warehouse building occupied by Amazon, and the Perris Valley Storm Drain Channel. Located farther south are a collection of warehouse distribution buildings (including but not limited to buildings currently occupied by Harbor Freight Tools and O'Reilly Auto Parts), undeveloped lands that are designated for future industrial development, and small parcels that contain small commercial, industrial, or manufacturing structures.

*Figure 2-1 Regional Map*

*Figure 2-2 Vicinity Map*

*Figure 2-3 USGS Topographic Map*

*Figure 2-4 Aerial Photograph*

*Figure 2-5 Surrounding Land Uses*

East: Immediately to the east of the Project site is Indian Street. East of Indian Street is developed primarily with single-family residential land uses, with pockets of undeveloped land designated for future residential development. The Morning Dove Christian Academy (approximately 0.6-mile), Mary McLeod Bethune Elementary School (approximately 0.9-mile), and Vista Verde Middle School (approximately 1.25 miles) are located farther east of the Project site.

West: The Project site is bordered on the west by a large warehouse building occupied by Lowe's, an industrial building occupied by Cardinal Glass Industries, and Heacock Street. West of Heacock Street is the March Air Reserve Base.

## **2.5 Existing General Plan Designations and Zoning**

The City of Moreno Valley General Plan designates the Project site as “Business Park/Light Industrial (BP).” According to General Plan Policy 2.5.1, the primary purpose of areas designated “Business Park/Light Industrial (BP)” is to provide manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities. Uses allowable within areas with the BP land use designation include manufacturing, research and development, warehousing and distribution, office, and support commercial activities.

As previously discussed, the Project site is located within the geographical limits of the MVIAP. The MVIAP applies an “Industrial” zoning designation to the Project site. The “Industrial” designation permits a wide range of industrial and industrial/business related support uses, including light manufacturing and storage and distribution facilities.

## **2.6 Description of the Proposed Project**

The proposed Project consists of an application for a Specific Plan Amendment (P15-036), Tentative Parcel Map (PA15-0018), and four individual Building Plot Plan applications (PA15-0014, PA15-0015, PA15-0016, and PA15-0017) to construct and operate a logistics center with four (4) buildings providing 1,737,518 square feet (s.f.) of total building space. Associated improvements to the property would include loading docks, surface parking areas (passenger car parking and truck trailer parking), drive aisles, roadway improvements, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins. The Project also includes public street vacations and street dedications.

### **2.6.1 Specific Plan Amendment (P15-036)**

The proposed Specific Plan Amendment (P15-036) would amend the land use buffer requirement specified in the MVIAP as it pertains to the Project site. MVIAP Section III, C.1, intends to provide a buffer between industrial and residential uses, without affecting the integrity of industrial land. The Specific Plan Amendment (SPA) proposes to reduce the minimum buffer distance specified in the MVIAP from 300 feet to 100 feet in order to provide a consistent setback with the distribution warehouse building already constructed immediately north of the Project site, and to add the requirement for a minimum 50-foot-wide enhanced landscaping zone within the 100-foot buffer area.

## **2.6.2 Tentative Parcel Map No. 36150 (PA15-0018)**

Tentative Parcel Map No. 36150 (TPM No. 36150, PA15-0018) proposes to consolidate an approximately 74.1-gross-acre portion of the Project site into two (2) parcels as depicted on Figure 2-6, *Tentative Parcel Map No. 36150*. Proposed Parcel 1 would contain approximately 62.6 net acres and proposed Parcel 2 would contain approximately 6.9 net acres. In addition, TPM No. 36150 identifies areas of public road dedication and vacation, and the size and location of proposed utility infrastructure improvements.

### **A. Public Roadway Vacations, Dedications, and Improvements**

The Project would dedicate land as public right-of-way to the City of Moreno Valley for the construction/widening of Krameria Avenue (0.02-acre), Indian Street (1.34 acres), Cosmos Street (1.23 acres), and Cardinal Avenue (0.01-acre). As part of the Project, two (2) roadway rights-of-way that were previously offered to the City of Moreno Valley but never constructed for public use are proposed to be vacated. The rights-of-way to be vacated are also known by the term “paper street” because the alignment exists only on maps, with no physical attributes constructed on the property. The “paper streets” to be vacated by the Project include 101 s.f. of Krameria Avenue and 0.46-acre of Cardinal Avenue.

The proposed Project would include frontage improvements to roadway rights of way abutting the Project site including: Indian Street, Krameria Avenue, Heacock Street, and Cardinal Avenue. In addition, the Project would construct the on-site cul-de-sac segment of Cosmos Street. Improvements would be consistent with City of Moreno Valley roadway standards.

### **B. Utility Infrastructure Improvements**

#### Water Service Facilities

Water service would be provided to the Project by Eastern Municipal Water District (EMWD). The Project proposes numerous connection points to the existing water lines installed beneath Indian Street, Krameria Avenue, Heacock Street, and Cardinal Avenue for domestic, irrigation, and fire hydrant services. Additionally, the Project would construct an 18-inch diameter water line in the proposed on-site segment of Cosmos Avenue for the purposes of on-site domestic, irrigation, and fire hydrant water services. All proposed water facilities are required to be designed in accordance with EMWD standards.

#### Wastewater Service Facilities

The Project would extend the existing sewer line installed beneath Heacock Street by approximately 90 feet from the north to provide sewer service to the northwest portion of the Project site and would construct a sewer line beneath Cardinal Avenue to provide sewer service to the southwest portion of the Project site. The Project also would install two private sewer lift stations on the northwest and southwest portions of the Project site to facilitate sewer service to the site. The eastern portion of the Project site would receive wastewater service via two proposed connections to the existing sewer line installed along the eastern edge of the Perris Valley Storm Drain Channel. All proposed wastewater facilities are required to be designed in accordance with EMWD standards.

*Figure 2-6 Tentative Parcel Map No. 36150*

#### □ Stormwater Drainage Plan

The Project's on-site drainage system would consist of underground storm drain pipes and water quality/detention basins. Stormwater flows would be captured by on-site storm drains and routed to one of six (6) proposed on-site water quality/detention basins before ultimately discharging from the site at one of four proposed outlets to the Perris Valley Storm Drain Channel, a regional storm drain facility that is designed by the Riverside County Flood Control and Water Conservation District (RCFCWCD) to collect and convey water discharged from properties in the Channel's drainage area. Runoff flows within Cosmos Street would be captured by a proposed system of storm drains within the street and then would be routed to existing storm drain facilities installed beneath Krameria Avenue.

The Project would install an off-site storm drain segment beneath the Krameria Avenue/Indian Street intersection to connect the existing storm drain line beneath Krameria Avenue to an existing open storm drain channel abutting the eastern edge of Indian Street. The Project also would install an off-site segment of storm drain beneath a portion of Indian Avenue to capture and convey stormwater runoff that originates within Indian Avenue south of Superior Avenue and discharge the captured flows into the Perris Valley Storm Drain Channel. Within the Perris Valley Storm Drain Channel, proposed improvements include the construction of outlet structures and headwalls at the four discharge points from the Project's on-site water quality/detention basins and the discharge point for the new off-site storm drain line beneath Indian Street (as described above). Rip-rap would be installed within the Perris Valley Channel at all proposed drainage outlets to preclude scour and erosion.

All proposed stormwater drainage improvements are required to be designed in accordance with Riverside County Flood Control and Water Conservation District (RCFCWCD) and City of Moreno Valley standards.

#### **C. Earthwork and Grading**

Grading would occur over the entire Project site. No area of the site would be left undisturbed. Proposed earthwork and grading activities would occur in two (2) phases and would involve 494,477 cubic yards of cut (including over-excavation) and 169,183 cubic yards of fill. Due to the proposed compaction of the over-excavated soils and expected soil subsidence and shrinkage as calculated by the Project's geotechnical engineer, proposed earthwork and grading activities are anticipated to balance and no import or export of soil would be required. When grading is complete, the Project site would have a slight, northwest-to-southeast slope. Proposed grading would not create manufactured slopes except around the proposed water/quality detention basins in the eastern portion of the site, where proposed slopes would measure up to five (5) feet in height with a maximum incline of 4:1.

### 2.6.3 Plot Plans PA15-0014, PA15-0015, PA15-0016, and PA15-0017

Four (4) individual Building Plot Plans are proposed as part of the Project. The individual Building Plots Plans provide site plans, including a detailed architectural and landscape design for Building 1 (PA15-0014), Building 2 (PA15-0015), Building 3 (PA15-0016), and Building 4 (PA15-0017). Plot Plans for Building 1 through Building 4 are presented in Figure 2-7 through Figure 2-10. Figure 2-11, *Moreno Valley Logistics Center Site Plan*, illustrates the relationship between the proposed on-site structures and improvements. The buildings are designed to range in size from approximately 97,222 s.f. to approximately 1,351,770 s.f. (for a total of 1,737,518 s.f.) with a minimum FAR of 0.34 and a maximum FAR of 0.50 (for an overall FAR of 0.47). At the time this IS was prepared, the future tenants of the Project site’s buildings are unknown. The buildings are designed to accommodate warehouse distribution, e-logistics, fulfillment center, or light-industrial operator(s), and may accommodate up to approximately 174,000 s.f. of cold storage (i.e., refrigeration) in the event building tenants require cold storage.

The Project also includes an alternate site plan that would omit Building 2 and construct a 166-space truck trailer parking lot in its place. The alternative site plan would not involve any changes to the size, location, configuration, or design of proposed Buildings 1, 3, or 4. Under the alternate site plan, the total building area on the Project site would be 1,615,002 s.f. (for an overall FAR of 0.44).

#### A. Parking and Loading

Figure 2-7 through Figure 2-10 depict the proposed locations of parking spaces and loading bays (also called “docks”) for each building. The number of parking spaces and loading bays proposed for each building are summarized as follows:

	Building 1	Building 2	Building 3	Building 4
<i>Parking Spaces</i>				
Automobile	349 <sup>1</sup>	92	92	120
Truck Trailer	317 <sup>1</sup>	29	39	26
<i>Loading Bays</i>				
Dock Doors	200	13	17	24

<sup>1</sup>The parking lot for Building 1 has the option to be striped to provide 472 automobile parking spaces and 242 truck trailer parking spaces, if required by the tenant(s) that occupy the structure.

Note: Under the alternative site plan, Building 2 would be replaced by a parking lot with 166 truck trailer spaces.

#### B. Architecture, Walls and Fences

The proposed buildings would be constructed to a height of 45 feet above finished grade, with architectural projections up to 54 feet above finished grade. The buildings would be constructed with concrete tilt-up panels and low-reflective, green glass. Articulated building elements, including mullions and metal canopies, are proposed as decorative elements. The proposed exterior architectural color palette is comprised of various shades of gray, silver, white, and green. The interior of the proposed buildings are designed to provide a main floor, office spaces, and mezzanine. The buildings have the potential to be partitioned for multiple tenant use.

*Figure 2-7 Building 1 Plot Plan*

*Figure 2-8 Building 2 Plot Plan*

*Figure 2-9 Building 3 Plot Plan*

*Figure 2-10 Building 4 Plot Plan*

*Figure 2-11 Moreno Valley Logistics Center Site Plan*

Solid concrete walls up to 14 feet in height would be installed at various locations throughout the Project site to screen truck parking and loading dock areas from public view. The concrete screen walls would be constructed with a finish and color that complements the color palette for proposed structures on the site. Access points into the loading dock and truck parking areas would include manually operated, eight (8)-foot tall tubular steel gates, equipped with Knox® padlocks to allow emergency vehicle access. Where fencing is provided to delineate property boundaries it would consist of the following: 8-foot high wrought iron fencing would be provided in areas visible from public viewing areas while 8-foot tall chain link fencing would be provided in areas not visible from public viewing areas.

### **C. Landscaping**

Drought-tolerant trees, shrubs, and groundcovers are proposed to be planted along street frontages of Krameria Avenue, Indian Street, and Heacock Street (including landscaping within public rights-of-way). Flowering accent and shade trees along with clusters of shrub planting would be installed along the Project site boundaries for screening purposes. Landscaping also would occur at building entries, in and around automobile parking areas, in and around the site's water quality/detention basins, and along proposed screen walls. Landscaping is estimated to cover approximately 11.0% of the property (approximately 9.8 acres). Proposed landscaping would be ornamental in nature, except within water quality/detention basins where plant materials would be selected to serve water quality functions. The Project's conceptual landscaping plan is illustrated on Figure 2-12, *Conceptual Landscape Plan*.

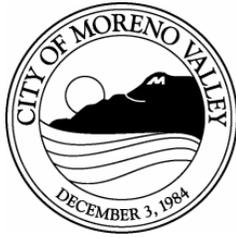
### **2.7 Discretionary Actions**

This IS addresses the potential environmental effects of the proposed Moreno Valley Logistics Center project, including all of the discretionary actions and approvals required to implement the Project, as well as subsequent construction and operational activities. As part of the proposed Project, the City of Moreno Valley will consider approval of a Specific Plan Amendment (P15-036), Tentative Parcel Map (PA15-0018), and four individual Building Plot Plan applications (PA15-0014, PA15-0015, PA15-0016, and PA15-0017). Additionally, permits and approvals may be required from other public entities, including, but not limited to, the Riverside County Airport Land Use Commission (ALUC), the Santa Ana Regional Water Quality Control Board (RWQCB), the United States Army Corps of Engineers (ACOE), the Riverside County Flood Control and Water Conservation District (RCFCWCD), and the Eastern Municipal Water District (EMWD).

*Figure 2-12 Conceptual Landscape Plan*

## **3.0 ENVIRONMENTAL CHECKLIST**

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**INITIAL STUDY/  
ENVIRONMENTAL CHECKLIST FORM  
CITY OF MORENO VALLEY**

1. **Project Title:** Moreno Valley Logistics Center (P15-036, PA15-0014, PA15-0015, PA15-0016, PA15-0017, and PA15-0018)
2. **Lead Agency Name and Address:** City of Moreno Valley Community & Economic Development Department, Planning Division, 14177 Frederick Street, Moreno Valley, CA 92552
3. **Contact Person and Phone Number:** Julia Descoteaux, Associate Planner, (951) 413-3209
4. **Project Location:** South of Krameria Avenue, north of Cardinal Avenue, east of Heacock Street and the March Air Reserve Base, and west of Indian Street.
5. **Project Sponsor's Name and Address:** Prologis L.P., 2817 E. Cedar St. Ste. 200, Ontario, CA 91761
6. **General Plan Designation:** Business Park/Light Industrial (BP)
7. **Zoning:** Moreno Valley Industrial Area Plan (Specific Plan No. 208) "Industrial"
8. **Description of the Project:** Refer to Section 2.0 of this Initial Study.
9. **Surrounding Land Uses and Setting:** The Project site is located in a portion of the City of Moreno Valley that is developing as a center for distribution warehousing, e-commerce, and light industrial land uses. The Project site is bordered by vacant, undeveloped land on the northwest and a large warehouse building on the northeast. The vacant, undeveloped land located northwest of the Project site is approved for future development as a warehouse distribution center (March Business Center). Located farther north of the Project site is Iris Avenue, undeveloped land, and residential development. The Project site is bordered on the south by partially developed Cardinal Avenue, a large warehouse building, and the Perris Valley Storm Drain Channel. Located farther south are a collection of warehouse distribution buildings, undeveloped lands that are designated for future industrial development, and small parcels that contain small commercial, industrial, or manufacturing structures. Immediately to the east of the Project site is Indian Street. East of Indian Street are single-family residential homes, with pockets of undeveloped land designated for future residential development. The Project site is bordered on the west by two large warehouse/industrial buildings and Heacock Street. West of Heacock Street is the March Air Reserve Base.
10. **Other public agencies whose approval is required:** Riverside County Airport Land Use Commission (Airport Land Use Plan Consistency Determination); Santa Ana Regional Water Quality Control Board (NPDES Permit); United States Army Corps of Engineers (Section 404 Permit); Riverside County Flood Control and Water Conservation District (Water Quality Management Permit and storm drain design), and Eastern Municipal Water District (domestic water and sewer system design).

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**ENERGY CONSERVATION**

Public Resources Code (PRC) Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Therefore, the State Resources Agency created Appendix F to the CEQA Guidelines. Appendix F is an advisory document that assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Thus, the EIR also will address the topic of energy conservation.

**DETERMINATION:** (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Signature

Date

Julia Descoteaux, Associate Planner

Printed Name

## EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c) (3) (d). In this case, a brief discussion should identify the following:
  - (a) Earlier Analysis Used. Identify and state where they are available for review.
  - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - (c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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<b>I. AESTHETICS.</b> Would the project:				
a) Have a substantial adverse effect on a scenic vista?				■
<i>(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan Figure 7-2, Major Scenic Resources; On-site Inspection (2015))</i>				
<p>The Project site is located within the City of Moreno Valley which lies within a relatively flat valley floor surrounded by rugged hills and mountains. Topographic features of Moreno Valley that provide vistas include the Box Springs Mountains and Reche Canyon to the north, the Badlands to the east and the Mount Russell area to the south. According to General Plan Figure 7-2, <i>Major Scenic Resources</i>, the Project site is not located within a view corridor for the Box Springs Mountains, Reche Canyon, the Badlands, or Mount Russell. Accordingly, implementation of the proposed Project would not have a substantial effect on a scenic vista. Thus, no impact would occur and no further analysis is required on this subject.</p>				
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				■
<i>Source: California Scenic Highway Program (Caltrans Mapping System); City of Moreno Valley General Plan Conservation Element; City of Moreno Valley General Plan Figure 7-2, Major Scenic Resources; Google Earth; On-site Inspection (2015)</i>				
<p>The Project site is not located within or adjacent to a scenic highway corridor and does not contain scenic resources, such as trees of scenic value, rock outcroppings, or historic buildings. 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. Additionally, the Project site is located approximately 4.2 miles south of State Route 60, which the City of Moreno Valley General Plan Figure 7-2 identifies as a “Scenic Route.” Due to the distance and intervening topography and development, the Project would not be visible from State Highway 74 or State Route 60. Accordingly, the Project site is not located within a state scenic highway corridor and implementation of the proposed Project would not have a substantial effect on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway corridor. Thus, no impact would occur and no further analysis is required on this subject.</p>				
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	■			
<i>(Source: Project Application Materials; On-site Inspection (2015); Moreno Valley Industrial Area Plan )</i>				
<p>Implementation of the proposed Project would convert land that was previously vacant and undeveloped to a logistics center with four (4) large buildings and associated loading docks and parking spaces, drive aisles, utility infrastructure, landscaping, exterior lighting, signage, and water quality/detention basins. The Project site is located in a portion of the City of Moreno Valley that is developing as a center for distribution warehousing, e-commerce, and light industrial land uses. Under existing conditions, the Project site is surrounded to the north and south by a mixture of industrial warehouse buildings and a few undeveloped and underutilized parcels that are planned for future industrial development; to the west by March Air Reserve Base, and to the east by single-family residential homes.</p>				
<p>Although the Project incorporates architectural features that would ensure that the proposed buildings would not be visually offensive and despite the fact that the proposed buildings would be compatible with the size, scale height and aesthetic qualities of other industrial buildings in the Project vicinity, because implementation of the proposed Project would change the property from undeveloped, vacant land to land that is developed with industrial uses, further analysis of the Project’s potential to substantially degrade the existing visual character or quality of the site and its surroundings is required. Thus, the Project’s potential to substantially degrade the existing visual character or quality of the site and its surroundings could be a potentially significant impact requiring further analysis in the required EIR.</p>				

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	■			
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(Source: Project Application Materials; Moreno Valley Industrial Area Plan; City of Moreno Municipal Code Chapter 9.08.100)

The Project site does not contain any artificial light sources or sources of glare under existing conditions. The proposed Project would include exterior lighting; however, the installation of exterior lighting would be ancillary to the proposed industrial buildings. The proposed Project would be required to adhere to the lighting requirements as set forth in the MVIAP and the City of Moreno Municipal Code. The MVIAP includes standards for lighting of property's within the MVIAP's boundaries as follows: "Exterior light fixtures shall be designed and placed so as not to provide light spillage on adjacent properties or public rights-of way." The use of "full cut off" fixtures should be used adjacent to the March Air Reserve Base to reduce nighttime lighting glare towards the flight line (Moreno Valley, 2002, pp. III-19). Additionally, City of Moreno Valley Municipal Code Chapter 9.08.100 establishes that all outdoor lighting associated with nonresidential uses shall be fully shielded and directed away from surrounding residential uses to reduce glare and light trespass, and shall not exceed one-quarter-foot-candle minimum maintained lighting measured from within five (5) feet of any property line. Furthermore, the City's Municipal Code also specifies that exterior lighting associated with nonresidential uses shall not blink, flash, or oscillate or be of unusually high intensity or brightness. The Project would be required to demonstrate compliance with these requirements to the City of Moreno Valley prior to issuance of building permits. Project compliance with the lighting requirements of the MVIAP and the City of Moreno Valley Municipal Code would ensure that the proposed Project would not produce a new source of substantial light or glare from artificial lighting sources that would adversely affect day or nighttime views in the area.

With respect to daytime glare impacts, the proposed Project would involve the construction of four (4) buildings with exterior building surfaces that consist of concrete tilt-up panels and low-reflective, green glass. While window glazing has a potential to result in minor glare effects, such effects would not adversely affect daytime views of any surrounding properties, including motorists on adjacent roadways, because the buildings would be surrounded along roadway perimeters with screen walls and/or landscaping. Additionally, areas proposed for window glazing would be limited, as shown on the Project's application materials. Solar panel arrays have the potential to be placed on portions of the building roofs. The installation of solar panels could cause glare impacts to adjacent properties, including the March Air Reserve Base. The potential for glare occurrence from solar panels would be minimal, because the angle of most roof mounted solar panels are directed into the sky and not at adjacent properties, and panels are absorptive, not reflective; regardless, the potential does exist for solar panels to create a new source of glare that could adversely affect views in the area. Accordingly, the potential for daytime and nighttime glare impacts is required to be studied in the required EIR.

**II. AGRICULTURE RESOURCES:** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project?

a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use?				■
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(Source: City of Moreno Valley General Plan FEIR Figure 5.8-1, Important Farmlands, California Department of Conservation, "Riverside County Important Farmland.")

According to City of Moreno Valley General Plan FEIR Figure 5.8-1, *Important Farmlands*, and mapping available from the California Department of Conservation Farmland Mapping & Monitoring Program (FMMP), the Project site contains lands classified as "Farmland of Local Importance." Accordingly, the Project site does not contain any lands mapped by the State Department of Conservation as Farmland, Unique Farmland, or Farmland of Statewide Importance. As such, the Project would not convert Prime

<b>Issues and Supporting Information</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Farmland, Unique Farmland or Farmland of Statewide Importance. Thus, no impact would occur to Prime Farmland, Unique Farmland or Farmland of Statewide Importance.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				■
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*(Source: Moreno Valley Industrial Area Plan; Riverside County Land Information System (RCLIS); Moreno Valley Map Viewer)*

No land within the City of Moreno Valley, including the Project site, is currently under a Williamson contract (City of Moreno Valley, 2006b, pp. 5.8-6). The Project site is zoned “Industrial” and surrounding land uses are zoned “Industrial” (areas to the north and south), “Residential (R5)” (areas to the east) and the March Air Reserve Base on the west. Accordingly, because the Project site is not located on or adjacent to land zoned for agricultural use and is also not subject to a Williamson Act contract, the proposed Project has no potential to conflict with existing zoning for agricultural use or a Williamson Act contract. As such, no impact would occur and no further analysis of this subject is required.

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	■			
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*(Source: Moreno Valley Industrial Area Plan; Riverside County Land Information System (RCLIS); California Department of Conservation, Farmland Mapping and Monitoring Program )*

As previously discussed under Item II(a), the Project site is classified as “Farmland of Local Importance” by the California Department of Conservation. The Project site is undeveloped and has been vacant or used for agricultural activities since at least 1938; however, there are no active agricultural uses on the subject property under existing conditions. Implementation of the Project would convert areas on the subject property classified as farmland (i.e., “Farmland of Local Importance”) to non-agricultural use. Thus, the potential impacts resulting from the Project’s conversion of farmland to non-agricultural use shall be fully analyzed in the EIR.

**III. AIR QUALITY:** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	■			
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*(Source: South Coast Air Quality Management District Final 2012 Air Quality Management Plan; City of Moreno Valley General Plan FEIR, Chapter 5.3 - Air Quality)*

The Project site is located in the South Coast Air Basin. Air quality within the South Coast Air Basin is regulated by the South Coast Air Quality Management District (SCAQMD). Standards for air quality are documented in the SCAQMD’s Air Quality Management Plan (AQMP), adopted in December 2012. The proposed Project would result in the emission of pollutants into the Air Basin during short-term construction and long-term operational activities. The pollutant levels emitted by the Project’s construction and operation have the potential to exceed the daily significance thresholds established by the SCAQMD, thereby potentially conflicting with or obstructing implementation of the SCAQMD’s 2012 Air Quality Management Plan. As such, an air quality technical report shall be prepared and the required EIR shall evaluate the proposed Project’s potential to conflict with the adopted SCAQMD’s Air Quality Management Plan.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	■			
<p><i>(Source: South Coast Air Quality Management District Final 2012 Air Quality Management Plan; City of Moreno Valley General Plan FEIR, Chapter 5.3 - Air Quality)</i></p>				
<p>Air quality within the South Coast Air Basin is regulated by the SCAQMD and standards for air quality are documented in the SCAQMD Air Quality Management Plan adopted in 2012. Development of the Project site as proposed by the Project has the potential to violate daily air pollutant emission significance thresholds established by the SCAQMD's Air Quality Management Plan, particularly related to Project construction and mobile source emissions associated with the Project's long-term operation. Accordingly, an air quality technical report shall be prepared and Project-related air emissions shall be modeled using the SCAQMD's California Emissions Estimator Model (CalEEMod). The purpose of this model is to estimate construction-source and operational-source air quality emissions for criteria pollutants from direct and indirect sources. The required EIR shall quantify the Project's expected pollutant levels and evaluate the proposed Project's potential to violate local air quality standards and/or contribute substantially to an existing or projected air quality violation.</p>				
c) 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)?	■			
<p><i>(Source: South Coast Air Quality Management District Final 2012 Air Quality Management Plan; City of Moreno Valley General Plan FEIR, Chapter 5.3 - Air Quality)</i></p>				
<p>The South Coast Air Basin is a non-attainment area for various state and federal air quality standards, including state and federal ozone standards (1-hour and 8-hour) and particulate matter standards (PM<sub>10</sub> and PM<sub>2.5</sub>). Development of the Project site as proposed by the Project could cumulatively contribute to a net increase of criteria pollutants in the region. Therefore, the required EIR shall address the Project's potential to result in a cumulatively considerable increase of pollutants for which the South Coast Air Basin is in non-attainment.</p>				
d) Expose sensitive receptors to substantial pollutant concentrations?	■			
<p><i>(Source: South Coast Air Quality Management District Final 2012 Air Quality Management Plan; City of Moreno Valley General Plan FEIR, Chapter 5.3 - Air Quality; Google Earth)</i></p>				
<p>The Project does not propose any sensitive receptors or land uses that may be considered point source emitters; however, the Project has the potential to expose nearby sensitive receptors to diesel particulate matter emissions from mobile sources associated with the Project (<i>i.e.</i>, diesel-fueled vehicles and equipment). Diesel particulate matter dissipates greatly beyond approximately 1,000 feet from the source but there are sensitive receptors (<i>e.g.</i>, single-family homes) located within 1,000 feet of the Project site and/or its primary truck route. Therefore, a diesel health risk assessment shall be prepared that evaluates impacts to maximum exposed sensitive receivers in the immediate vicinity of the Project site and its primary truck route. The health risk assessment also shall evaluate the proposed Project's potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards. This information shall be disclosed in the required EIR.</p>				

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e) Create objectionable odors affecting a substantial number of people?			■	
<p><i>(Source: Project Application Materials)</i></p> <p>The Project could produce odors during proposed construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, construction activities on the Project site would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.</p> <p>During long-term operation, the proposed Project site would contain a logistics center, the operating characteristics of which are not typically associated with objectionable odors. The temporary storage of refuse associated with the proposed Project’s long-term operational use could be a potential source of odor; however, Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City’s solid waste regulations, thereby precluding any significant odor impact. Furthermore, the proposed Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance, during long-term operation. As such, long-term operation of the proposed Project would not create objectionable odors affecting a substantial number of people.</p>				

**IV. BIOLOGICAL RESOURCES.** Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?	■			
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<p><i>(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.9 – Biological Resources, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP); On-Site Inspection (2015))</i></p> <p>The Project site consists of undeveloped land that is routinely disturbed (i.e., disced) as part of weed abatement activities. Additionally, the Project site is transected by the Perris Valley Storm Drain Channel, an engineered storm drain channel, in a northwest to southeast direction. Although the Project site has been disturbed, the site has the potential to support sensitive species such as small mammals and migratory birds including the western burrowing owl. Because the Project site has the potential to contain species and/or habitat that supports species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service, the EIR shall evaluate the proposed Project’s potential to impact candidate, sensitive, or special status species which may be present on the site. A qualified biologist shall evaluate the site’s existing biological resources and determine the presence or absence of any sensitive species. The results of the biological resources assessment(s) shall be disclosed and evaluated in the required EIR.</p>				
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b) 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 Wildlife or U. S. Fish and Wildlife Service?	■			
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<p><i>(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.9 – Biological Resources, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), On-Site Inspection (2015))</i></p> <p>The Project site consists of disturbed land and does not contain any sensitive native vegetation. The Project site is transected by the Perris Valley Storm Drain Channel in a northwest to southeast direction and the Project would construct outlets within the Channel to release storm water runoff from the Project site. The Perris Valley Storm Drain Channel ultimately discharges to the Santa Ana River. Thus, there is the potential for the Project to affect riparian or other sensitive natural community identified in local or regional</p>				
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Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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plans, policies, regulations or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service. A qualified biologist shall evaluate the Project’s impact area to determine if the property contains riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service. The results of the biological resources assessment shall be disclosed and evaluated in the required EIR.

c) 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?	■			
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*(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.9 – Biological Resources, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), On-Site Inspection(2015))*

The Project site consists of undeveloped land that is routinely disturbed (i.e., disced) as part of weed abatement activities. The Project proposes storm drain outlet structures that would connect to the Perris Valley Storm Drain Channel. The Perris Valley Storm Drain Channel is under the jurisdiction of the U.S. Army Corps of Engineers. Therefore, a qualified biologist shall evaluate the Project’s potential to impact federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.). The results of the biological resources assessment shall be disclosed and evaluated in the required EIR.

d) 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?	■			
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*(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.9 – Biological Resources, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), On-Site Inspection (2015))*

The Project site is disturbed and does not support a diversity of native wildlife. Paved roads, fencing, and developed land surrounding the Project site block terrestrial wildlife movement from all directions. Wildlife movement corridors in western Riverside County and the City of Moreno Valley are addressed by the conservation requirements specified in the Western Riverside County MSHCP, and the Project site is not identified for conservation as part of the MSHCP. Accordingly, the site is not considered to be a wildlife movement corridor. Nonetheless, development of the Project site as proposed by the Project has some minimal potential to impact avian species that are protected by the federal Migratory Bird Treaty Act. The Project’s potential to impact migratory birds during construction and long-term operation shall be evaluated in the required EIR.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	■			
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*(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.9 – Biological Resources, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP); Google Earth: City of Moreno Valley Municipal Code Chapter 9.17.03 )*

The only applicable local ordinance protecting biological resources is the City’s Landscape and Irrigation Design Standards (“Landscape Ordinance,” Municipal Code Chapter 9.17.030). The Landscape Ordinance specifies requirements that would apply to projects that require the removal of existing mature trees. The Project site contains a few trees along Indian Street. As such, a discussion of the Landscape Ordinance shall be discussed in the required EIR. Additionally, as discussed above under Item IV(d) the Project site shall adhere to the policies of the MSHCP.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	■			
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*(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.9 – Biological Resources, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP); City of Moreno Valley Municipal Code Title 3 Chapter 3.48 and Chapter 8.60; Riverside County Land Information System (RCLIS))*

The Project site is subject to the provisions of the Western Riverside County MSHCP. The proposed Project will be required to 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 to implement the MSHCP. The Project site is not located within one of the targeted conservation cells of the MSHCP. The Project site is, however, subject to the survey and conservation requirements of MSHCP Section 6.3.2 (Species Survey Requirements), which requires the preparation of a habitat assessment for the western burrowing owl. Pursuant to Section 6.3.2 of the MSHCP, a burrowing owl site assessment shall be submitted for the Project site, and the findings of the site assessment shall be evaluated in the required EIR to determine the Project’s consistency with the MSHCP.

The Project site also is located in the Stephens’ Kangaroo Rat (SKR) Habitat Conservation Plan (HCP). Impacts to SKR habitat throughout the HCP area are mitigated by complying with City of Moreno Valley Municipal Code Title 3, Chapter 8.60, 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. Thus, the biological resources assessment shall also evaluate the presence or absence of SKR and its potential to occur on the Project site. The findings of the site assessment shall be evaluated in the required EIR to determine the Project’s consistency with the MSHCP.

**V. CULTURAL RESOURCES.** Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				■
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*(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.10 – Cultural Resources)*

The Project site is undeveloped and contains no developed features (i.e., structures). The Project site was not identified as containing a historic resource as part of the historic resource inventory that was conducted as part of the City of Moreno Valley General Plan FEIR, as depicted on FEIR Exhibit 5.10-1, *Locations of Listed Historic Resource Inventory Structures*. Accordingly, the Project has no potential to impact a historical resource as defined by CEQA.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	■			
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*(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.10 – Cultural Resources)*

According to the Moreno Valley General Plan FEIR, the subject property is not a part of any known Native American village complex. A majority of archaeological locations in the City of Moreno Valley are milling stations where bedrock metates (more or less flat grinding surfaces), commonly referred to as ‘slicks,’ and bedrock mortars are found. These locations “are generally situated around valley edges where suitable rock outcrops occur” (City of Moreno Valley, 2006b, pp. 5.10-6). Additionally, according to General Plan FEIR Figure 5.10-2, *Locations of Prehistoric Resources*, the Project site is not identified by the City of Moreno Valley as an identified location of prehistoric sites. The Project site is not located on a valley edge and does not contain any rock outcrops and, based on the information presented in the General Plan FEIR, does not have a high likelihood for the discovery of archaeological resources. However, a site-specific survey have never been conducted to evaluate the potential archaeological

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sensitivity of the Project site. A site-specific cultural resources assessment shall be conducted by a professional archaeologist to determine likelihood for the presence/absence of archaeological resources to be located on or beneath the surface of the Project site. The results of the site-specific cultural resources assessment shall be disclosed in the required EIR.

During site excavation and/or grading activities that would occur on the property during Project construction activities, there is a potential to uncover resources buried beneath the surface of the site. The Project’s potential to impact previously undiscovered archaeological resources beneath the surface of the site, which could result in an adverse change in the significance of the resources pursuant to California Code of Regulations §15064.5, shall be evaluated in the required EIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	■			
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*(Source: City of Moreno Valley General Plan Conservation Element; City of Moreno Valley General Plan FEIR, Chapter 5.10 – Cultural Resources; County of Riverside General Plan)*

The Project site is not known to contain unique geologic features. The Project site is identified by the City’s General Plan FEIR Exhibit 5-10-3, *Paleontological Resource Sensitive Areas*, as having a “Low Potential” to contain unique paleontological resources but is identified by the County of Riverside General Plan as having a “high” potential to contain paleontological resources. During site excavation and/or grading activities that would occur on the property during Project construction activities, there is a potential to uncover fossils that may be buried beneath the surface of the site. Thus, the Project’s potential to impact previously undiscovered paleontological resources beneath the surface of the site shall be evaluated in the required EIR.

d) Disturb any human remains, including those interred outside of formal cemeteries?			■	
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*(Source: Project Application Materials; On-Site Inspection (2015))*

The Project site does not contain a known cemetery. While not anticipated, in the unlikely 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. No further analysis is required on this subject.

**VI. GEOLOGY AND SOILS.** Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				■
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*(Source: City of Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR, Chapter 5.6 – Geology and Soils, California Department of Conservation “Alquist-Priolo Earthquake Fault Zone Maps,”; United States Geological Survey Earthquake Hazards Program; “Geotechnical Investigation Proposed Moreno Valley Logistics Center” prepared by Southern California Geotechnical, dated March 24, 2015)*

No known earthquake faults are located on the Project site (United States Geological Survey 2010, California Department of Conservation 2010), and the nearest mapped fault is located approximately 10.0 miles east of the Project site as mapped on City Moreno Valley General Plan FEIR Figure 5.6-2, *Seismic Hazards*. Because there are no faults located on the Project site, there is no potential that the proposed Project could expose people or structures to substantial adverse effects, including the risk of loss, injury or death involving ground rupture. Thus, no impact would occur and no further analysis of this subject is required.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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(ii) Strong seismic ground shaking?			■	
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*(Source: City of Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR, Chapter 5.6 – Geology and Soils; Geotechnical Investigation Proposed Moreno Valley Logistics Center” prepared by Southern California Geotechnical, dated March 24, 2015)*

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 proposed Project. As a mandatory condition of Project approval, the Project would be required to construct the proposed warehouse building in accordance with the California Building Standards Code (CBSC), also known as California Code of Regulations (CCR), Title 24 (Part 2), and the City of Moreno Valley Building Code, which is based on the CBSC with local amendments. The CBSC and City of Moreno Valley Building Code provide standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures, and have been specifically tailored for California earthquake conditions. In addition, the CBSC (Chapter 18) and the City of San Bernardino Building Code (Chapter 8.21) require development projects to prepare geologic engineering reports to identify site-specific geologic and seismic conditions and implement the site-specific recommendations contained therein to preclude adverse effects involving unstable soils and strong seismic ground-shaking, including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems. The Project has prepared such a report, which is on file with the City of Moreno Valley, and the City would condition the Project to comply with the site-specific ground preparation and construction recommendations contained in this report. With mandatory compliance with these standard and site-specific design and construction measures, potential impacts related to seismic ground shaking would be less than significant. As such, the Project would not expose people or structures to substantial adverse effects, including loss, injury or death, involving seismic ground shaking. Impacts would be less-than-significant.

(iii) Seismic-related ground failure, including liquefaction?			■	
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*(Source: City of Moreno Valley General Plan FEIR, Chapter 5.6 – Geology and Soils; “Geotechnical Investigation Proposed Moreno Valley Logistics Center” prepared by Southern California Geotechnical, dated March 24, 2015; Riverside County Land Information System)*

According to General Plan FEIR Figure 5.6-2 *Seismic Hazards*, the Project site is not located in an area with the potential for liquefaction. Also, according to Riverside County Land Information System (RCLIS), the property is located within a zone of low liquefaction susceptibility. Additionally, the geotechnical investigation prepared for the property concludes that based on observed subsurface conditions, liquefaction is not considered a design concern for the proposed Project (SoCalGeo, 2015, p. 11). The City of Moreno Valley will require that the property be developed in accordance with the latest applicable seismic safety guidelines, including the standard requirements of the CBSC and the City of Moreno Valley Building Code. Furthermore, the Project would be required to comply with the site-specific grading and construction recommendations contained within the Project’s geotechnical report (on file with the City of Moreno Valley), which the City would impose as a standard condition of Project approval, to further reduce the risk of seismic-related ground failure due to liquefaction. Thus, the Project’s impacts to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction, would be less than significant and no further analysis of this subject is required.

(iv) Landslides?			■	
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*(Source: On-site Inspection (2015), Project Application Materials, City of Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR, Chapter 5.6 – Geology and Soils; Geotechnical Investigation Proposed Moreno Valley Logistics Center” prepared by Southern California Geotechnical, dated March 24, 2015)*

The Project site is relatively flat with an elevation range from 1,497 AMSL at its northern boundary and 1,468 AMSL at the property’s lowest point at the southeast corner of the property. Also, there are no hillside or steep slopes on or in the vicinity of the Project site. Accordingly, the Project site is located in an area with a low potential for landslides. When grading is complete, the

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project site would have a slight, northwest-to-southeast slope; the highest point of the site would be approximately 1,493 AMSL at the northwest corner of the site and would slope downward to an elevation of approximately 1,476 AMSL in the southeast portion of the Project site. Proposed grading would not create manufactured slopes except around the proposed water/quality detention basins in the eastern portion of the site, where proposed slopes would measure up to five (5) feet in height with a maximum incline of 4:1. Thus, development of the proposed Project would not expose people or structures to potential substantial adverse effects from landslides and a less than significant impact would occur. No further analysis of this subject is required.

(b) Result in substantial soil erosion or the loss of topsoil?			■	
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*(Source: On-site Inspection (2015), Project Application Materials, City of Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR, Chapter 5.6 – Geology and Soils; Geotechnical Investigation Proposed Moreno Valley Logistics Center” prepared by Southern California Geotechnical, dated March 24, 2015)*

Development of the Project site as proposed by the Project would disturb the site during grading and construction and expose the underlying soils, which would temporarily increase erosion susceptibility. Based on the granular content of the existing on-site soils, some of the on-site soils may be susceptible to erosion during construction (SoCalGeo, 2015, p. 16). In the long-term, development of the subject property would increase the extent of impervious surface cover and landscaping on the Project site, thereby reducing the potential for erosion and loss of topsoil. The Project would be required to adhere to standard regulatory requirements, including, but 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) and a Project-specific Water Quality Management Plan (WQMP) that includes Best Management Practices (BMPs) to minimize water pollutants including sedimentation in stormwater runoff. With mandatory compliance with the City of Moreno Valley’s NPDES Municipal Stormwater Permit and the Project’s WQMP, the Project’s potential to result in substantial soil erosion or the loss of topsoil would be less than significant and no further analysis of this subject is required.

(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			■	
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*(Source: Project Application Materials, City of Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR, Chapter 5.6 – Geology and Soils; Geotechnical Investigation Proposed Moreno Valley Logistics Center” prepared by Southern California Geotechnical, dated March 24, 2015)*

Under existing conditions, native alluvial soils underlie the subject property. The alluvial soils generally consist of very stiff to hard sandy clays, clayey silts and silty clays as well as medium dense to very dense sands, silty sands and clayey sands extending to 30± feet (SoCalGeo, 2015, p. 6). The native alluvial soils at depths of 2 to 4 feet possess generally lower strengths than the native alluvial soils at greater depths. The native soils at depths of 2 to 4 feet also possess significant collapse potential and moderate susceptibility to load-induced consolidation, under existing conditions. Additionally, numerous samples of the near surface clayey soils are dry and possess a moderate potential for swelling and soil heave when exposed to cyclical wetting and drying, under existing conditions. (SoCalGeo, 2015, pp. 11-12)

However, the Project’s geotechnical report (on file with the City of Moreno Valley) indicates that the site’s shrinkage/swelling, subsidence and settlement potential would be attenuated through the proposed removal of near surface soils down to competent materials and replacement with properly compacted fill, which is included as a recommendation in the Project’s geotechnical report (SoCalGeo, 2015, pp. 10-24). Through standard conditions of approval, the proposed Project would be required by the City to incorporate the recommendations contained within the Project geotechnical report into the grading plan for the Project. As such, implementation of the Project would result in less-than-significant impacts associated with soil shrinkage/subsidence and collapse.

As discussed in Item IV (a), (iii) and (iv), development of the property as proposed by the Project would result in a less than

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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significant impact involving ground failure, including liquefaction, and a less than significant impact involving landslides.

(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			■	
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*(Source: Project Application Materials, City of Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR, Chapter 5.6 – Geology and Soils; Geotechnical Investigation Proposed Moreno Valley Logistics Center” prepared by Southern California Geotechnical, dated March 24, 2015 )*

The near surface soils on the property generally consist of sandy clays, silty clays, and clayey sands (SoCalGeo, 2015, p. 12). As determined by Southern California Geotechnical, the near surface on-site soils are determined to possess a low-to-medium expansion potential (Expansion Index ranging from 0 to 66) (SoCalGeo, 2015, p. 9). The Project’s geotechnical report (on file with the City of Moreno Valley) indicates that expansive soils on the subject property would be attenuated through soil moisture conditioning during grading activities, which is included as a recommendation in the Project’s geotechnical report (SoCalGeo, 2015, p. 16). Through standard conditions of approval, the proposed Project would be required by the City to incorporate the recommendations contained within the Project geotechnical report into the grading plan for the Project. As such, implementation of the Project would result in less-than-significant impacts associated with expansive soils and would not create substantial risks to life or property.

[Note: Item VI.d is based on Appendix G of the CEQA Guidelines and references Table 18-1-B of the 1994 Uniform Building Code (UBC). This Table no longer exists. The Building Code currently in effect, the 2013 CBC, references ASTM D-4829, a standard procedure for testing and evaluating the expansion index (or expansion potential) of soils established by ASTM International, which was formerly known as the American Society for Testing and Materials (ASTM).]

(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				■
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*(Source: Project Application Materials)*

Wastewater service is available to the Project area under existing conditions via an existing 8-inch diameter sewer line in Heacock Street and via an existing 30-inch diameter sewer line along the eastern edge of the Perris Valley Storm Drain Channel. The proposed Project would not install septic tanks or alternative wastewater disposal systems on the Project site. Accordingly, no impact would occur.

**VII. GREENHOUSE GAS EMISSIONS. Would this project?**

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	■			
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*(Source: Project Application Materials; California Assembly Bill 32 (2006))*

Greenhouse gas (GHG) emissions associated with the proposed Project would primarily be associated with Project-related traffic. In addition, Project-related construction activities, energy consumption, water consumption, and solid waste generation also would contribute to the Project’s overall generation of GHGs. The City of Moreno Valley has not adopted any numerical thresholds of significance for GHG emissions. Significance of the proposed Project’s GHG impacts will be based on compliance with Assembly Bill 32 (AB 32, 2006). AB 32 establishes goals for the statewide reduction of GHG emissions. On October 9, 2012, the Moreno Valley City Council approved an *Energy Efficiency and Climate Action Strategy* document that 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). The overall goal of the *Energy Efficiency and Climate Action Strategy* is to ensure that the City is consistent with and would not otherwise conflict with the provisions of AB 32. Thus, consistency with AB 32 is the

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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appropriate significance threshold to apply to evaluate Project consistency. Due to the Project’s potential to emit GHGs, a Project-specific GHG emissions report shall be prepared for the Project. The results of the GHG emissions report shall be disclosed in the required EIR.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	■			
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*(Source: Project Application Materials; California Assembly Bill 32 (2006))*

AB 32 is the primary plan, policy or regulation adopted in the State of California to reduce GHG emissions, and the proposed Project would have a significant impact related to GHG emissions if it does not comply with the reduction goals developed under AB 32. As noted above under the discussion of Item VII (a), a Project-specific GHG emissions report shall be prepared to determine whether the Project would be consistent with the GHG reduction goals established by AB 32. The required EIR shall document the findings of the Project-specific GHG emissions report and shall evaluate the Project for consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions.

**VIII. HAZARDS AND HAZARDOUS MATERIALS.** Would the project?

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	■			
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*(Source: Project Application Materials; Moreno Valley Industrial Area Plan)*

The Project site consists of vacant undeveloped land that is routinely disturbed (i.e., disced) and does not contain any structures. Because the Project site is vacant and undeveloped under existing conditions, no substantial hazards or hazardous materials are expected to occur; regardless, a site-specific environmental assessment technical report shall be prepared for the proposed Project to determine the presence or absence of hazardous materials on the Project site, including the potential for the Project site to be impacted by a contaminated groundwater plume originating from March Air Reserve Base. The results of the site-specific technical report shall be disclosed and evaluated in the required EIR.

During construction of the proposed Project, a limited amount of hazardous materials would be transported to, stored, and used on the property (fuel, paint, etc.), that are typical in a construction operation and do not create a significant hazard to the public or environment.

The specific businesses or tenants that will occupy the Project’s proposed buildings are not known at this time. The Project site is located within the MVIAP, and is designated for “Industrial” land uses. Based on the list of land uses permitted in the MVIAP’s Industrial zone, it is possible that hazardous materials could be used during the course of daily operations, including the storage and use of refrigerant that may be used on-site (in the event that cold storage is provided on-site). The Project’s potential to create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials during long-term operation shall be fully analyzed in the required EIR.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	■			
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*(Source: Project Application Materials; Moreno Valley Industrial Area Plan)*

See response to Item VIII(a), above.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				■
<p><i>(Source: Project Application Materials; Google Earth, City of Moreno Valley General Plan FEIR Section 5.13-Public Services and Utilities)</i></p> <p>No existing or proposed schools occur within one-quarter mile of the Project site. The nearest school sites to the Project site are Rainbow Ridge Elementary School, located at 15950 Indian Street, approximately 0.60-mile north of the Project site and Morning Dove Christian School, located at 25065 Morning Dove Way, approximately 0.60-mile east of the Project site. 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. No impact would occur and no further analysis of this subject is required.</p>				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result would it create a significant hazard to the public or the environment?				■
<p><i>(Source: Project Application Materials; Moreno Valley Industrial Area Plan; City of Moreno Valley General Plan FEIR Section 5.5 Hazards; California Environmental Protection Agency (CalEPA); California Department of Toxic Substance Control)</i></p> <p>The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.</p>				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			■	
<p><i>(Source: City of Moreno Valley General Plan Safety Element Figure 6-5, Air Crash Hazards, City of Moreno Valley General Plan FEIR, Chapter 5.5 – Hazards; March ARB/Inland Port Airport Joint Land Use Study)</i></p> <p>The Project site is located adjacent to and east of the March Air Reserve Base. According to City of Moreno Valley General Plan FEIR Figure 5.5-3, <i>City Areas Affected by Aircraft Hazard Zones</i>, and March Air Reserve Base/Inland Port Land Use Study, Exhibit 2-14, <i>Accident Potential Zones</i>, the Project site is not located within an Accident Potential Zone or “Clear Zone” (i.e., high risk areas 3,000 feet from each end of the runway). Thus, because the Project site is not located in an area identified as an Accident Potential Zone or a Clear Zone, implementation of the proposed Project would not result in a safety hazard for people living or working on the Project area and impacts would be less than significant.</p>				
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				■
<p><i>(Source: City of Moreno Valley General Plan Safety Element; City of Moreno Valley General Plan FEIR, Chapter 5.5 – Hazards; Google Earth)</i></p> <p>There are no private airfields or airstrips in the vicinity of the Project site. Thus, there is no potential for the implementation of the Project to result in a safety hazard for people residing or working in the Project area. No impact would occur and no further analysis of this subject is required.</p>				

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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g) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?			■	
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(Source: Project Application Materials, City of Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR, Chapter 5.5 – Hazards)

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 proposed Project would not interfere with an adopted emergency response or evacuation plan, impacts would be less than significant and no further analysis of this subject is required.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				■
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(Source: Project Application Materials, City of Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR Section 5-5, Hazards; On-Site Inspection (2015))

According to City of Moreno Valley General Plan FEIR figure 5.5-2, *Floodplains and High Fire Hazard Areas*, the Project site is not located in an area of substantial or high fire risk. The Project site is located in an area that has been largely developed, with the March Air Reserve Base located to the west of the Project site. No wildlands are located on or adjacent to the Project site and the Project site is largely devoid of vegetation and surrounded on all sides by developed properties, paved roads, maintained sites, and/or the Perris Valley Storm Drain Channel. Thus, implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No impact would occur and no further analysis of this subject is required.

**IX. HYDROLOGY AND WATER QUALITY.** Would the project:

a) Violate any water quality standards or waste discharge requirements?	■			
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(Source: Project Application Materials, City of Moreno Valley General Plan FEIR, Chapter 5.7 – Hydrology/Water Quality)

The California Porter-Cologne Water Quality Control Act (Section 13000 (“Water Quality”) et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). Construction of the Project would involve grading, paving, utility installation, building construction, and landscaping installation, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals paints, and other solvents with the potential to affect water quality. Long-term operation of the Project site with land uses allowed within the MVIAP’s “Industrial” zone are anticipated to generate storm water pollutants such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease. The Project’s potential to violate any water quality standards or waste discharge requirements during short-term construction and/or long-term operational activities shall be fully analyzed in the required EIR.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			■	
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(Source: Project Application Materials, City of Moreno Valley General Plan FEIR-Section 5.7 – Hydrology/Water Quality)

As depicted on City of Moreno Valley General Plan FEIR Figure 5.7-2, *Groundwater Basins*, the Project site is located within the

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Perris North Groundwater Basin. There are few domestic uses for groundwater within the City, due to salinity/water quality issues, and the City primarily relies on imported water from EMWD for its domestic water supply. The Project does not propose the installation of any water wells that would directly extract groundwater; however, the increase in impervious surface cover 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 (City of Moreno Valley, 2006b, pp. 5.7-12), “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.” Additionally, water captured by the proposed Project’s water quality/detention basins and landscaped areas would have the opportunity to percolate into the ground. With buildout of the Project, the local groundwater levels would not be adversely affected. Therefore, impacts to groundwater supplies and recharge would be less than significant, and no further analysis is required on this subject.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	■			
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*(Source: Project Application Materials)*

Construction of the proposed Project would involve mass grading of the site which would change the site’s existing ground contours and alter the site’s existing drainage pattern. Upon buildout of the Project, stormwater runoff from all portions of the Project site except for Cosmos Street would be captured by on-site storm drains and routed to one of six (6) on-site water quality/detention basins. Runoff flows within Cosmos Street would be captured by a proposed on-site system of storm drains that would be routed to existing storm drain facilities installed beneath Krameria Avenue. All Project runoff flows would ultimately be discharged to the Perris Valley Storm Drain Channel similar to existing conditions. The required EIR shall evaluate whether proposed alterations to the site’s existing drainage pattern would result in substantial erosion or siltation on- or off-site.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or surface runoff in a manner which would result in flooding on- or off site?	■			
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*(Source: Project Application Materials)*

As described above under Item IX(c), mass grading of the site would alter the existing drainage pattern of the site. A site-specific hydrology study shall be prepared to evaluate whether the proposed alterations to the site’s existing drainage pattern would substantially increase the rate or amount of runoff leaving the subject property and, should such an increase occur, whether or not flooding would occur on- or off-site. The findings of the site-specific hydrology study shall be disclosed in the EIR.

e) Create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	■			
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*(Source: Project Application Materials)*

Refer to Items IX(a), (c), and (d), above.

f) Otherwise substantially degrade water quality?	■			
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*(Source: Project Application Materials)*

Refer to Items IX(a), (c), and (d), above.

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				■
<i>(Source: Project Application Materials, City of Moreno Valley General Plan FEIR Section 5.5- Hazards; Federal Emergency Management Agency (FEMA) Flood Map Service Center (online))</i>				
The Project consists of the construction and operation of a logistics center and does not propose any housing. Because the Project does not propose housing, there is no potential for the Project to place housing within a 100-year floodplain. Thus, no impact would occur and no further analysis of this subject is required.				
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	■			
<i>(Source: Project Application Materials, City of Moreno Valley General Plan FEIR Section 5.5 - Hazards; Federal Emergency Management Agency (FEMA) Flood Map Service Center (online))</i>				
According to City of Moreno Valley General Plan FEIR Figure 5.5-2, <i>Floodplains and High Fire Hazards Areas</i> , portions of the Project site are located within a 100-year floodplain. Also, according to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps, the western and eastern portions of the Project site are located within Flood Zone “X (Shaded)” which corresponds to areas with low-to-moderate flood hazards (i.e., greater than 0.2% annual chance of flood) while the central portion of the Project site is located within Flood Zone “AO (Depth 1’)” which is subject to flooding during the 100-year storm event at depths less than one-foot (1’). Accordingly, the Project has the potential to place within a 100-year flood hazard structures that would impede or redirect flows. Thus, the Project’s potential to impede or redirect flood flows shall be fully analyzed in the required EIR.				
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			■	
<i>(Source: Project Application Materials, City of Moreno Valley General Plan FEIR Section 5.5 – Hazards)</i>				
The nearest dam to the Project site is Lake Perris, located approximately 2.5 miles southeast of the Project site. According to City of Moreno Valley General Plan FEIR Figure 5.5-2, <i>Floodplains and High Fire Hazard Areas</i> , the Project site is not located in an identified dam inundation area. The Perris Valley Storm Drain Channel, a Riverside County Flood facility that transects the Project site in a northwest to southeast direction is not considered a levee and no levees occur in the Project vicinity. Accordingly, impacts would be less than significant and no further analysis of this subject is required.				
j) Inundation by seiche, tsunami, or mudflow?				■
<i>(Source: Project Application Materials, City of Moreno Valley General Plan FEIR Section 5.5 – Hazards; Google Earth)</i>				
The Pacific Ocean is located more than 40 miles from the Project site; consequently there is no potential for tsunamis to impact the Project site. In addition, the Project site and immediate surrounding area do not contain steep hillsides subject to mudflow. The nearest water body to the Project site is Lake Perris which is located approximately 2.5 miles southeast and downstream of the Project site. Due to the distance from Lake Perris to the Project site and the topographic characteristics of the area, a seiche in Lake Perris would have no impact on the Project site. Although the Perris Valley Storm Drain Channel traverses a portion of the Project site, it is not an enclosed or semi-enclosed basin that would be conducive to reverberation and creation of seiches. Therefore, the Project site would not be subject to seiches, mudflows, and/or tsunamis. Thus, no impact would occur and no further analysis of this subject is required.				

Issues and Supporting Information	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**X. LAND USE AND PLANNING.** Would the project:

a) Physically divide an established community?				■
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*(Source: Project Application Materials, On-Site Inspection (2015); Google Earth)*

The Project site consists of vacant and undeveloped land that is located within the geographical limits of the MVIAP. The Project site is located in a developing area of the City of Moreno Valley that is designated for industrial development. Development of the Project site as a logistics center would not physically disrupt or divide the arrangement of an established community. The property is proposed to be developed in accordance with its assigned General Plan land use designation and MVIAP zoning designation. Properties adjacent to the Project site to the north, south, and west have either been developed or are planned for long-term development with industrial land uses. Property to the east is developed with single-family homes and the MVIAP requires that a buffer be provided between residential and industrial development. The Project would not isolate the residential neighborhood to the east from any neighboring communities, as the Project site is positioned at the border of planned industrial development and existing residential development. Division of an established community would not occur and no further analysis of this subject is required.

b) Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	■			
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*(Source: Project Materials; City of Moreno Valley General Plan Land Use Map; City of Moreno Valley General Plan Community Development Element; Moreno Valley Industrial Area Plan )*

The Project proposes to develop the subject property with a logistics center which would be consistent 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. The Project proposes a Specific Plan Amendment that would amend the land use buffer requirement specified in the MVIAP as it pertains to the Project site. MVIAP Section III, C.1, intends to provide a buffer between industrial and residential uses, without affecting the integrity of industrial land. The Project’s SPA proposes to reduce the minimum buffer distance specified in the MVIAP along Indian Street from 300 feet to 100 feet (measured from the roadway centerline) in order to provide a consistent setback with the distribution warehouse building already constructed immediately north of the Project site, and to add the requirement for a minimum 50-foot-wide enhanced landscaping zone within the 100-foot buffer area. The required EIR shall include an analysis of the environmental effects associated with proposed revisions to the buffer requirements.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?			■	
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*(Source: City of Moreno Valley General Plan Conservation Element; City of Moreno Valley General Plan FEIR, Chapter 5.9 – Biological Resources; Western Riverside County Multiple Species Habitat Conservation Plan (MHSCP))*

As described under the response to Item IV(f), the Project site is subject to the provisions of the western Riverside County MSHCP. The proposed Project will be required to 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 to implement the MSHCP. The Project site is not located within one of the targeted conservation cells of the MSHCP. The Project site is, however, subject to the survey and conservation requirements of MSHCP Section 6.3.2 (Species Survey Requirements), which requires the preparation of a habitat assessment for the western burrowing owl. Pursuant to Section 6.3.2 of the MHSCP, a burrowing owl site assessment shall be submitted for the Project site, and the findings of the site assessment shall be evaluated in the required EIR to determine the Project’s consistency with the MSHCP. The Project site also is located in the Stephens’ Kangaroo Rat (SKR) Habitat Conservation Plan (HCP). Impacts to SKR habitat throughout the HCP area are mitigated by complying with City of Moreno Valley Municipal Code Title 3, Chapter 8.60, which requires a per-acre local development

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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. The Project’s potential to conflict with the policies of the MSHCP shall be addressed in the required EIR under the discussion and analysis of Item IV(f). No further analysis of this topic is required.

**XI. MINERAL RESOURCES.** Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				■
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*(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.14 – 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, as disclosed by the City’s General Plan and the associated General Plan FEIR. 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. In addition, the City’s General Plan does not identify any locally-important mineral resource recovery sites on-site or within close proximity to the Project site. Accordingly, no further analysis of this subject is required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				■
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*(Source: City of Moreno Valley General Plan Conservation Element, City of Moreno Valley General Plan FEIR, Chapter 5.14 – Mineral Resources)*

Please refer to the response to Item XI(a), above.

**XII. NOISE.** Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	■			
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*(Source: Project Application Materials; City of Moreno Valley General Plan FEIR Chapter 5.4 - Noise; City of Moreno Valley Municipal Code, Chapter 11.80 – Noise Regulation)*

Project-related construction activities, as well as long-term operational activities (including on-site logistics warehouse operations and the projected increases in vehicular travel along area roadways), may expose persons in the vicinity of the Project site to noise levels in excess of standards established by the City’s General Plan and Chapter 11.80, Noise Regulation, of the City’s Municipal Code. An acoustical analysis shall be prepared and the required EIR shall analyze the potential for the Project to expose people, on- or off-site, to noise levels in excess of established noise standards.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	■			
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*(Source: Project Application Materials)*

Construction activities on the Project site may produce groundborne vibration or groundborne noise levels during earthwork/grading and/or during the operation of heavy machinery. The required EIR shall analyze the potential of the Project to expose persons to excessive groundborne vibration. Long-term operation of the proposed Project is not anticipated to result in perceptible levels of groundborne vibration or groundborne noise; regardless, the Project’s EIR shall also evaluate the proposed Project’s potential to

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generate groundborne vibration and noise in the long-term.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	■			
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*(Source: Project Application Materials; City of Moreno Valley General Plan FEIR Chapter 5.4 - Noise; City of Moreno Valley Municipal Code, Chapter 11.80 – Noise Regulation)*

Development of the Project site as proposed by the Project would generate increased vehicular traffic that has the potential to cause an increase in ambient noise levels. On-site operational activities associated with the four proposed buildings have the potential to increase ambient noise levels. A site-specific acoustical study shall be prepared for the proposed Project to identify potential increases in ambient noise and to analyze the potential for Project-related noise to increase ambient noise to a level that would be considered substantial and permanent compared to existing conditions. The results of the acoustical study shall be summarized and incorporated into the required EIR.

d) A substantially temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	■			
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*(Source: Project Application Materials; City of Moreno Valley General Plan FEIR Chapter 5.4 - Noise; City of Moreno Valley Municipal Code, Chapter 11.80 – Noise Regulation)*

During Project-related construction activities, there could be a temporary or periodic increase in ambient noise levels in the Project vicinity above existing levels due to temporary construction traffic and the temporary and periodic operation of construction equipment. A site-specific acoustical study shall be prepared for the Project to identify the potential for temporary or periodic increases in ambient noise levels that would be considered substantial compared to existing conditions. The results of the acoustical study shall be summarized and incorporated into the required EIR.

e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			■	
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*(Source: Project Application Materials; City of Moreno Valley General Plan FEIR Section 5.4 – Noise; March ARB/Inland Port Airport Joint Land Use Study)*

The northwestern portion of the Project site is bordered by Heacock Street. The March Air Reserve Base is located directly west of Heacock Street. Accordingly, the Project site is located within two miles of a public airport. According to General Plan Figure 5.4-1, *March Reserve Air Base Noise Impact Area*, the Project site is located outside of the 60 dBA CNEL noise contour and would not be subjected to excessive noise levels due to operations at the March Air Reserve Base. Because the Project site is not located within the March ARB noise contours, the Project would not expose people residing or working in the Project area to excessive noise levels due to its location within two miles of a public airport. A less than significant impact would occur and no further analysis of this subject is required.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				■
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*(Source: Project Application Materials; Google Earth)*

The Project site is not located near any private airfields or airstrips. Therefore, the proposed Project has no potential to expose people to excessive noise levels associated with operations at a private airstrip. No further analysis of this subject is required.

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**XIII. POPULATION AND HOUSING.** Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				■
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*(Source: Project Application Materials; City of Moreno Valley General Plan Land Use Map; City of Moreno Valley General Plan FEIR, Chapter 5.12 – Population and Housing; Moreno Valley Industrial Area Plan)*

The proposed Project would develop the subject property with a logistics center with four (4) buildings in accordance with the “Business Park/Light Industrial” land uses designation applied to the site by the City of Moreno Valley General Plan and the “Industrial” zoning designation applied to the site by the MVIAP. Accordingly, the proposed 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, so the Project would not induce growth as a result of utility extensions. For these reasons, implementation of the proposed Project would not result in direct or indirect growth in the area, and impacts would be less than significant. No further analysis of this subject is required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				■
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*(Source: On-Site Inspection (2015); Google Earth)*

The Project site does not contain any residential structures under existing conditions. Accordingly, implementation of the Project would not displace substantial numbers of existing housing and would not necessitate the construction of replacement housing elsewhere. No impact would occur and no further analysis of this subject is required.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				■
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*(Source: On-Site Inspection (2015); Google Earth)*

As described above under response to Item XIII(b), the Project site does not contain any residential structures; therefore, no people live on the subject property under existing conditions. Accordingly, implementation of the proposed Project would not displace substantial numbers of people and would not necessitate the construction of replacement housing elsewhere. No impact would occur and no further analysis of this subject is required.

**XIV. PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?			■	
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*(Source: Project Application Materials; City of Moreno Valley General Plan Safety Element; City of Moreno Valley General Plan FEIR, Chapter 5.13-Public Services and Utilities; Riverside County Fire Department Strategic Plan; Riverside County Fire Department GIS ; City of Moreno Valley Municipal Code, Chapter 3.42, Commercial and Development Impact Fees (Ordinance No. 695))*

Fire protection services to the Project site are provided by the Moreno Valley Fire Department (MVFD). The proposed Project is 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. College Park Fire Station (Station No. 91) is located at 16110 Lasselle Street, approximately 1.5 roadway miles to the northeast of the Project site. Secondary service is provided by the Kennedy Park Fire Station

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(Station No. 65) located at 15111 Indian Avenue, approximately 1.8 roadway miles to the northwest of the Project site. The Project site would be adequately serviced by these stations. To supplement their existing fire stations, the MVFD plans to construct a fire station within the MVIAP to provide primary service to all properties within the MVIAP and immediately adjacent areas. The MVFD has already acquired a property for the future fire station within the MVIAP area, on San Michele Road, between Perris Boulevard and Indian Avenue. Construction of the new fire station is dependent on funding collected by the City through the City of Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695). This new fire station is already planned and the Project would not cause the need for the new station. Based on the Project site's proximity two existing fire stations and a new station that is already planned, the proposed Project would be adequately served by fire protection services, and no new or expanded unplanned facilities would be required. The proposed Project is required to comply with the provisions of the City of Moreno Valley's Development Impact Fee (DIF) 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 DIF Ordinance would be required prior to the issuance of a building permit.

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. Impacts to fire protection facilities would be less than significant and no further analysis of this subject is required.

b) Police protection?			■	
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*(Source: Project Application Materials, Moreno Valley General Plan Safety Element, City of Moreno Valley General Plan FEIR, Chapter 5.13-Public Services and Utilities, City of Moreno Valley Municipal Code, Chapter 3.42, Commercial and Development Impact Fees (Ordinance No. 695))*

The development of the subject property with a logistics center would introduce new building structures and employees to the Project site which would result in an incremental increase in demand for police protection services, but which is not anticipated to 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 Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695), which requires a fee payment that the City applies to the funding of public facilities, including police protection facilities. Mandatory compliance with the DIF Ordinance would be required prior to the issuance of a building permit. 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 fire protection facilities. Impacts to police protection facilities would therefore be less than significant and no further analysis of this issue area is warranted.

c) Schools?				■
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*(Source: Project Application Materials, California Senate Bill 50 (Greene), California Government Code Section 65995, City of Moreno Valley General Plan FEIR, Chapter 5.1, Land Use)*

Development of the Project site as proposed by the Project would not create a direct demand for public school services, as the subject property would contain non-residential uses that would not generate any school-aged children requiring public education. The addition of employment-generating uses on the Project site would assist the City in achieving its goal to provide a better jobs/housing balance within the City and the larger western Riverside County region (City of Moreno Valley 2006b). The proposed Project is not expected to draw a substantial number of new residents to the region and would therefore not indirectly generate school-aged students requiring public education. Because the proposed Project would not directly generate students and is not expected to indirectly draw students to the area, the proposed Project would not cause or contribute to a need to construct new or physically altered public school facilities. Although the Project would not create a demand for additional public school services, 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. Impacts to public schools would be less than significant and no further analysis of this subject is required.

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d) Parks?				■
<p><i>(Source: Project Application Materials)</i></p> <p>As discussed under items XV(a) and XV(b) below, 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 proposed Project would not adversely affect any park facility. Thus, no impact would occur and no further analysis of this subject is required.</p>				

e) Other public facilities?				■
<p><i>(Source: Project Application Materials)</i></p> <p>The proposed Project is not expected to result in a demand for other public facilities/services, including libraries, community recreation centers, post offices, and animal shelters. As such, implementation of the proposed Project would not adversely affect other public facilities or require the construction of new or modified public facilities. Thus, no impact would occur and no further analysis of this subject is required.</p>				

**XV. RECREATION**

a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				■
<p><i>(Source: Project Application Materials)</i></p> <p>The Project proposes to develop the Project site with industrial land uses. 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. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, thus, no impact would occur and no further analysis of this subject is required.</p>				

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				■
<p><i>(Source: Project Application Materials)</i></p> <p>The Project proposes to develop the Project site with industrial land uses. The Project does not propose to construct any new on- or off-site recreation facilities. Additionally, the Project would not expand any existing off-site recreational facilities. Thus, environmental effects related to the construction or expansion of recreational facilities would not occur with implementation of the proposed Project. Thus, no impact would occur and no further analysis of this subject is required.</p>				

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**XVI. TRANSPORTATION/TRAFFIC.** Would the project:

a) 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?	■			
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*(Source: Project Application Materials; Caltrans District 8 (Kopulsky))*

The proposed Project would contribute an increased volume of vehicular traffic to the local roadway network and has the potential to adversely affect the performance of the local circulation system on a direct and/or cumulative level. A site-specific traffic study shall be prepared according to the City of Moreno Valley Traffic Report Preparation Guidelines. The study shall quantify the volume of vehicular traffic anticipated to travel to and from the Project site. Given the property's location, it is anticipated that a majority of the proposed Project's truck traffic would route north toward the Cactus Avenue interchange at I-215 and south toward the Harley Knox Boulevard interchange at I-215. The traffic study shall model the effects of Project-related traffic on the local circulation system, taking all modes of transportation into account. The traffic analysis study area for local roads will be defined as intersections of collector roads or higher that receive 50 or more Project-related peak hour trips in accordance with City of Moreno Valley traffic report guidelines. The traffic analysis study area for freeway mainline segments will include all freeway mainline segments that would receive 50 or more Project-related peak hour trips. Based on communication with Caltrans District 8, analysis of freeway mainline segments that receive less than 50 Project-related peak hour trips is not required because when Project-related traffic volumes dissipate to fewer than 50 peak hour trips they become unrecognizable from other traffic on the state highway system (Kopulsky 2014). The required EIR shall disclose the findings of the site-specific traffic study and evaluate the Project's potential to conflict with applicable plans, ordinances, and policies that establish a minimum level of performance for the local circulation system.

b) 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?	■			
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*(Source: Project Application Materials, Riverside County Congestion Management Program)*

Traffic generated by the proposed Project has the potential to impact the Riverside County Congestion Management Plan (CMP) roadway network. Potential effects to the CMP roadway system shall be evaluated in a site-specific traffic study, and the results of this study shall be used in the required EIR to determine the Project's consistency with the Riverside County CMP, including applicable level of service standards and travel demand/congestion management measures. As described above under Item XVI(a), the Project's traffic analysis study area will include all freeway mainline segments that would receive 50 or more Project-related peak hour trips.

c) 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?				■
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*(Source: Project Application Materials, March ARB/Inland Port Airport Joint Land Use Study)*

The proposed Project would involve the construction of four (4) buildings with a maximum height of 45 feet above finished grade, with architectural projections up to 52 feet above finished grade, which is less than the height limit established for the subject property by the March ARB/Inland Port Airport Joint Land Use Study. In addition, the proposed Project would not include an air travel component (i.e., helipad) and products transported to and from the Project site would not be done so by direct air. Accordingly, the proposed Project would not have any effect on air traffic patterns, including an increase in traffic levels or a change

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in flight path location that results in substantial safety risks. As such, no impact would occur and additional analysis of this issue is not required.

d) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?			■	
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*(Source: Project Application Materials)*

Based on City staff review of the proposed Project’s application materials submitted to the City of Moreno Valley, no unsafe design features are proposed as part of the Project. All improvements planned as part of the Project would be in conformance with applicable City of Moreno Valley standards and would not result in any hazards due to a design feature. Additionally, the proposed Project would be compatible in transportation design with the existing City of Moreno Valley General Plan designation of “Business Park/Light Industrial (BP)” and the MVIAP “Industrial” zoning designation. Thus, impacts would be less than significant and no further analysis is required on this subject.

e) Result in inadequate emergency access?			■	
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*(Source: Project Application Materials)*

Implementation of the proposed Project would result in the construction and operation of a logistics center on the subject property 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 Project’s applications, the Project’s design would be reviewed to ensure that adequate access to and from the site and around the proposed buildings is provided for emergency vehicles. With required adherence to City of Moreno Valley requirements for emergency vehicle access, impacts would be less than significant.

f) Conflict with adopted policies or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			■	
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*(Source: Project Application Materials; Moreno Valley General Plan Figure 9-4, Bikeway Plan; Moreno Valley Bicycle Master Plan; Google Earth)*

The proposed Project would contain a logistics center, which is a land use that is not likely to attract large volumes of pedestrian, bicycle, or transit traffic. Regardless, the Project is designed to comply with all applicable City of Moreno Valley transportation policies.

According to City of Moreno Valley General Plan Figure 9-4, *Bikeway Plan*, the Project site abuts Class III bikeways on Heacock Street, Krameria Avenue, and Indian Street. Class III bikeways are designated bikeways, not striped, and are shared with vehicles (City of Moreno Valley, 2006a, pp. 5-3). In 2015, the City of Moreno Valley adopted a *Bicycle Master Plan*, which updates and supersedes the recommendations of the General Plan. The *Bicycle Master Plan* identifies a planned Class I, multi-use bike path adjacent to the segment of the Perris Valley Storm Drain Channel that traverses the Project site and Class II (striped) bike lanes along the segments of Heacock Street and Indian Street that abut the Project site. The Project does not include any element that would preclude the use of the planned Class I and Class II bicycle facilities adjacent to the Project site. The Project’s driveways would be stop-sign controlled and sight distance at each Project driveway would be reviewed by the City of Moreno Valley at the time future improvement plans are considered to ensure that sight distance meets applicable City standards and provides for safe bicycle and pedestrian circulation. Furthermore, bicycle parking would be provided on the Project site in accordance with City Municipal Code requirements for bicycle parking facilities.

The Project area is served by the Regional Transportation Authority (RTA), which provides bus service along Krameria Avenue (east of Indian Street), Iris Avenue (east of Indian Street) and along Perris Boulevard (east of Indian Street). Because the Project site does

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not abut any public transit facilities, there is no potential for the Project to conflict with local public transit service.

As demonstrated by the foregoing analysis, the Project would not conflict with adopted policies, plans, or programs related to alternative transportation, or otherwise substantially decrease the performance or safety of such facilities. Impacts would be less than significant.

**XVII. UTILITIES AND SERVICE SYSTEMS.** Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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*(Source: Project Application Materials)*

Wastewater service is provided to the Project site by Eastern Municipal Water District (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 exceed applicable wastewater treatment requirements established by the RWQCB. Accordingly, impacts would be less than significant.

b) Require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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*(Source: Project Application Materials)*

Domestic water and wastewater services are provided to the Project site by EMWD. The proposed Project would install connections to water and wastewater conveyance lines that exist beneath abutting public roadways. Except for small encroachments into adjacent public rights of way of developed/paved streets to connect to existing lines, and the construction of water and sewer lines on-site, no physical disturbance for the installation of water or wastewater facilities would be required to service the proposed Project. As such, there would be no environmental impacts beyond those that would otherwise occur from grading and development on the Project site, which will be evaluated by the topics identified for analysis in the required EIR.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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*(Source: Project Application Materials)*

The Project would involve the construction of on- and off-site stormwater drainage facilities, including water quality/detention basins, storm drain pipes, and storm drain outlet structures. The construction of stormwater drainage facilities proposed by the Project would result in physical impacts to the surface and subsurface of the Project site, as well as physical impacts within the Krameria Avenue/Indian Street intersection (to accommodate a proposed storm drain line segment), a portion of Indian Avenue (to accommodate a proposed storm drain line segment), and within the Perris Valley Storm Drain Channel (to accommodate five proposed storm drain outlets). These impacts are considered to be part of the Project's construction phase and are evaluated throughout this Initial Study accordingly. In instances where potentially significant impacts may occur during the Project's construction phase, such potential impacts have been identified under the appropriate issue area in this Initial Study. The construction of storm drain infrastructure on- and off-site as necessary to serve the proposed Project would not result in any potentially significant physical effects on the environment that are not already identified and disclosed as part of this Initial Study.

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d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			■	
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*(Source: Project Application Materials; EMWD 2010 Urban Water Management Plan)*

The proposed Project would result in an increase in potable water demand 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. The proposed Project is subject to the provisions of Senate Bill 610 (Costa) (California Public Resources Code Section 21151.9 and Water Code Section 10910 et seq.) because the proposed Project involves an “industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 s.f. of floor area.” As such, the EMWD is required to conduct a Water Supply Assessment to verify that the proposed development can be served by sufficient water supplies without the need for new or expanded entitlements. The results of the Project-specific Water Supply Assessment shall be incorporated and disclosed in the required EIR. With EMWD approval of a Water Supply Assessment, no further analysis of this subject is required.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?			■	
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*(Source: Project Application Materials; Press Enterprise “Eastern completes massive expansion at treatment plant”)*

Wastewater flows generated by the Project would be conveyed to the Perris Valley Regional Water Reclamation Facility, which is owned and operated by EMWD. In April 2014, an expansion project was completed on the Perris Valley Regional Water Reclamation Facility to expand its daily treatment capacity from 14 million gallons per day to 22 million gallons per day to provide sufficient treatment for anticipated regional growth. The facility receives approximately 14 million gallons of wastewater flows per day and, therefore, has an excess treatment capacity of approximately eight million gallons per day (Schulte 2014). The Project is anticipated to generate approximately 67,809 gallons of wastewater per day, based on EMWD’s wastewater generation factor of 1,700 gallons per day per acre of light industrial building area. This corresponds to approximately eight-tenths of one percent (0.8%) of the existing treatment capacity 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 existing and planned available capacity at this facility, it is determined that the Perris Valley Regional Water Reclamation Facility would have sufficient capacity to treat wastewater generated by the Project. As such, impacts would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?			■	
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*(Source: Project Application Materials; City of Moreno Valley Ordinance No. 706, Recycling and Diversion of Construction Waste: Riverside County Waste Management District “Countywide Disposal Tonnage Tracking System Disposal Reports”; United States Environmental Protection Agency (USEPA), “Estimating 2003 Building- Related Construction and Demolition Amounts”)*

Implementation of the proposed Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. 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. Additionally, the Project would be required to comply with mandatory waste reduction requirements as described below in Item XVII(g).

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. Existing capacities at each of these landfills is discussed below.

<b>Issues and Supporting Information</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Badlands Landfill has a permitted disposal capacity of 4,000 tons per day. The Badlands Landfill is estimated to reach capacity, at the earliest time, in the year 2024; however, future landfill expansion opportunities exist at this site. During the third quarter of 2014, which is the most recent time period for which reporting data is available, the Badlands Landfill accepted approximately 225,671.04 tons of waste ((RCWMD, 2014).

The Lamb Canyon Landfill has a permitted disposal capacity of 5,000 tons per day. The landfill is estimated to reach capacity, at the earliest, in the year 2021; however, future landfill expansion opportunities exist at this site. During the third quarter of 2014, which is the most recent time period for which reporting data is available, the Lamb Canyon Landfill accepted approximately 145,607.60 tons of waste (RCWMD, 2014).

The El Sobrante Landfill is estimated to reach capacity, at the earliest time, in the year 2045; however, future landfill expansion opportunities exist at this site. During the third quarter of 2014, which is the most recent time period for which reporting data is available, the El Sobrante Landfill accepted approximately 555,793.26 tons of waste (RCWMD, 2014).

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. The landfills have sufficient capacity to accept solid waste generated by the Project’s construction and operational phases, Thus, impacts would be less than significant.

Project Construction Waste

Waste would be generated by the construction process, primarily consisting of discarded materials and packaging. Based on the building square footage of 1,702,518 and the US EPA’s construction waste generation factor of 4.34 pounds per s.f., approximately 3,694 tons of waste would be generated during the entire estimated 14-16 month construction process (USEPA, 2009) which amounts to approximately 10.5 to 12 tons per day.

Non-recyclable construction waste generated by the Project would be disposed at the Badlands Sanitary Landfill, the El Sobrante Landfill, and/or the Lamb Canyon Landfill. These landfills all receive well below their maximum permitted daily disposal volume; thus, construction waste generated by the Project is not anticipated to cause these landfills to exceed their maximum permitted daily disposal volume. Furthermore, none of these regional landfill facilities are expected to reach their total maximum permitted disposal capacities during the Project’s construction period. The Badlands Sanitary Landfill, the El Sobrante Landfill, and Lamb Canyon Landfill would have sufficient daily capacity to accept solid waste generated by the Project’s construction phase; therefore, impacts to landfill capacity associated with the Project’s near-term construction activities would be less than significant.

Project Operational Waste

Based on a daily waste generation factor of 1.42 pounds of waste per 100 square feet of building area obtained from CalRecycle, long-term, on-going operation of the proposed 1,702,518 square foot light industrial warehouse building would generate approximately 12 tons of waste per day (CalRecycle, 2013). At least 50% is required to be recycled pursuant to State law.

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. The landfills have sufficient capacity to accept solid waste generated by the Project’s construction and operational phases; therefore, impacts would be less than significant and no further analysis of this subject is required.

<b>Issues and Supporting Information</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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g) Comply with federal, state, and local statutes and regulations related to solid waste?			■	
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*(Project Application Materials)*

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’s building tenants would be required to work with future refuse haulers to develop and 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 proposed 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. The implementation of these programs would reduce the amount of solid waste generated by the proposed 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.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.**

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	■			
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*(Project Application Materials)*

The Project would alter the property from vacant undeveloped land to property that would contain a warehouse distribution center with four (4) buildings, associated loading docks and parking spaces, drive aisles, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins. Accordingly, the Project has the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The required EIR shall evaluate the Project’s potential to degrade the quality of the environment and/or result in substantial adverse effects to biological and cultural resources.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	■			
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*(Source: Project Application Materials; Moreno Valley Industrial Area Plan)*

The Project site is located in a portion of the City of Moreno Valley that is developing with logistics, e-commerce, and industrial warehousing uses, which implement the City’s adopted General Plan and MVIAP. The widespread development of this area with industrial uses was previously evaluated by the MVIAP EIR in 1989 (SCH No. 1988080813) and by the City’s General Plan Program EIR (SCH No. 2000091075), certified July 11, 2006. Development of the Project site as proposed by the Project, in addition to concurrent construction and operation of other development projects in the area, has the potential to result in cumulatively considerable impacts, particularly with respect to the following issue areas: air quality, greenhouse gas emissions, noise, and transportation/traffic. The required EIR shall evaluate the Project’s potential to result in cumulatively considerable contributions to cumulatively significant impacts.

<b>Issues and Supporting Information</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	■			
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*(Source: Project Application Materials)*

The potential for the proposed Project to directly or indirectly affect human beings will be evaluated in the required EIR particularly with respect to the following issue areas: air quality, greenhouse gas emissions, and noise.

## **4.0 REFERENCES**

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## 4.0 REFERENCES

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*This Initial Study was prepared by:*

City of Moreno Valley

Richard Sandzimier, Planning Official

Julia Descoteaux, Associate Planner

T&B Planning, Inc.

Tracy Zinn, Principal

David Ornelas, Project Manager

Connie Anderson, Environmental Analyst

Eric Horowitz, GIS Manager

Steve Lusk, GIS/Graphics Specialist

*The following information sources were used during the preparation of this IS:*

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**Community Development Department  
Planning Division**  
14177 Frederick Street  
P. O. Box 88005  
Moreno Valley CA 92552-0805  
Telephone: 951.413-3206  
FAX: 951.413-3210

Date: June 17, 2015  
To: Responsible and Trustee Agencies/Interested Organizations and Individuals  
Subject: **Notice of Preparation of a Draft Environmental Impact Report**

**Lead Agency:**

CITY OF MORENO VALLEY  
Community Development Department  
14177 Frederick Street  
PO Box 88005  
Moreno Valley, California 92552  
(951) 413-3209  
Contact: Julia Descoteaux, Associate Planner

**EIR Consulting Firm:**

T&B PLANNING, INC.  
17542 East 17<sup>th</sup> Street  
Suite 100  
Tustin, California 92780  
(714) 397-4224  
Contact: Tracy Zinn, Principal

This Notice of Preparation (NOP) includes an Initial Study (IS) that describes the proposed project and the issues to be examined in an Environmental Impact Report (EIR) as required by the California Environmental Quality Act (CEQA). The documentation is provided in the attached CD for your review and comment.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than 30 days after receipt of this notice or July 17, 2015.

Please send your response to Ms. Julia Descoteaux at the City of Moreno Valley address shown above. Please include the name, phone number, and address of a contact person in your response. If your agency or organization will be a responsible or trustee agency for this Project, please so indicate.

**Project Title: Moreno Valley Logistics Center (Specific Plan Amendment P15-036, Tentative Parcel Map PA15-0018; Plot Plan PA15-0014, Plot Plan PA15-0015, Plot Plan PA15-0016, and Plot Plan PA15-0017)**

**Location:** The project site is located in the southern portion of the City of Moreno Valley, approximately 1.3 miles east of Interstate 215 (I-215), 4.2 miles south of State Route 60 (SR-60), and 2.5 miles northwest of Lake Perris. The project site is located within the geographical limits of the Moreno Valley Industrial Area Plan (MVIAP, Specific Plan 208), which is an area of the City of Moreno Valley designated for Industrial development. At the local scale, the Project site is located south of Krameria Avenue, north of Cardinal Avenue, east of Heacock Street and the March Air Reserve Base, and west of Indian Street. The site lies within the southwestern portion of Section 30, Township 3 South, Range 3 West

(San Bernardino Base and Meridian) and includes Assessor Parcel Numbers 316-100-028, -030, -048, -051, and -052.

**Description:** The proposed Project is described in the IS attached to this NOP. The Project includes the following proposed discretionary actions by the City of Moreno Valley:

- 1) **Specific Plan Amendment (P15-036)** would amend the MVIAP to reduce the land use buffer distance between the project site and existing residential development to the east from 300 feet to 100 feet in order to provide a consistent setback with the distribution warehouse building already constructed immediately north of the project site and to add the requirement for a minimum 50-foot-wide enhanced landscaping zone within the proposed 100-foot buffer area.
- 2) **Tentative Parcel Map No. 36150 (PA15-0018)** proposes to consolidate an approximately 73.4-gross-acre portion of the Project site into two (2) parcels. Proposed Parcel 1 would contain approximately 62.6 net acres and proposed Parcel 2 would contain approximately 6.9 net acres. In addition, TPM No. 36150 identifies areas of public road dedication and vacation, and the size and location of proposed utility infrastructure improvements.
- 3) **Plot Plan PA15-0014** proposes a detailed site plan for Building 1, and includes a land use plan, architectural plans, and landscape design. Building 1 would be constructed with a maximum of 1,351,770 s.f. of total floor space area.
- 4) **Plot Plan PA15-0015** proposes a detailed site plan for Building 2, and includes a land use plan, architectural plans, and landscape design. Building 2 would be constructed with a maximum of 122,516 s.f. of total floor space area.
- 5) **Plot Plan PA15-0016** proposes a detailed site plan for Building 3, and includes a land use plan, architectural plans, and landscape design. Building 3 would be constructed with a maximum of 97,222 s.f. of total floor space area.
- 6) **Plot Plan PA15-0017** proposes a detailed site plan for Building 4, and includes a land use plan, architectural plans, and landscape design. Building 4 would be constructed with a maximum of 166,010 s.f. of total floor space area.

## **ENVIRONMENTAL ISSUES TO BE EVALUATED IN THE EIR**

The initial environmental review of projects, such as the proposed Moreno Valley Logistics Center project, is normally a three-step process governed by the California Environmental Quality Act (CEQA). The first step is for the lead agency, the City of Moreno Valley, to

determine whether a project is exempt from CEQA review. The City has determined that this project is not exempt. The typical second step is the preparation of an IS to determine potential impacts of the project on the environment. If the IS determines that the project has the potential to cause one or more significant environmental impacts, the usual third step is to determine whether or not an EIR must be prepared.

In this case, the City of Moreno Valley has already determined that an EIR will need to be prepared based on the scale of the project and the potential for the project to cause environmental effects. Therefore, an EIR will be prepared to evaluate those effects.

This NOP and the accompanying IS evaluate submitted applications for a Specific Plan Amendment (P15-036), Tentative Parcel Map (PA15-0018), and four individual Building Plot Plan applications (PA15-0014, PA15-0015, PA15-0016, and PA15-0017) to construct and operate a warehouse distribution center on an approximately 89.4 acre property with four (4) buildings providing 1,737,518 square feet (s.f.) of total floor area. Associated improvements to the property would include loading docks, surface parking areas, drive aisles, roadway improvements, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins.

Based on the information presented in the IS, the following environmental factors will be evaluated in detail in the EIR for the proposed Moreno Valley Logistics Center project:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Transportation/Traffic
- Mandatory Findings of Significance

The IS further describes the anticipated scope of the environmental analysis for each issue.

The EIR will address the short- and long-term effects of the Project on the environment. The EIR also will evaluate the potential for the Project to cause direct and indirect growth-inducing impacts, as well as cumulative impacts. Alternatives to the proposed Project will be evaluated that may reduce or avoid environmental impacts that are determined to be significant in the EIR. A mitigation monitoring program also will be developed as required by Section (§) 15150 of the CEQA Guidelines.

The environmental determination in this NOP is subject to a 30-day public review period per Public Resources Code §21080.4 and CEQA Guidelines §15082. During the public review period, public agencies, interested organizations, and individuals have the opportunity to comment on the proposed Project and identify those environmental issues that have the potential to be affected by the Project and should be addressed further by the City of Moreno Valley in the EIR.

**SCOPING MEETING**

Because the Project meets the CEQA Guidelines §15206 definition of a project having statewide, regional, or areawide significance, the City of Moreno Valley will hold a scoping meeting as specified in CEQA Guidelines §15082(c). The scoping meeting will be held at:

Monday, July 6, 2015  
6:00 – 7:00 p.m.  
City of Moreno Valley, City Hall  
City Council Chambers  
14177 Frederick Street  
Moreno Valley, California 92552

At this meeting, agencies, organizations, and members of the public will be able to hear a brief presentation of the project and provide comments on the scope of the environmental review process for the proposed Moreno Valley Logistics Center project.

Please contact the Community Development Department at (951) 413-3209 if you have any questions.

Sincerely,



Julia Descoteaux  
Associate Planner



Richard Sandzimier  
Planning Official



State of California - Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C-220  
Ontario, CA 91764  
(909) 484-0459  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

*EDMUND G. BROWN, Jr., Governor*  
*CHARLTON H. BONHAM, Director*



July 02, 2015

Ms. Julia Descoteaux  
Associate Planner  
City of Moreno Valley  
14177 Frederick Street  
Moreno Valley, CA 92552

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Moreno Valley Logistics Center Project  
State Clearinghouse No. 2015061040

Dear Ms. Descoteaux:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Moreno Valley Logistics Center Project (project) [State Clearinghouse No. 2015061040]. The Department is responding to the NOP as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

The proposed project includes a specific plan amendment, tentative parcel map, and four plot plans on Assessor Parcel Numbers (APNs) 316-100-028, -030, -048, -051, and -052, located south of Krameria Avenue, north of Cardinal Avenue, east of Heacock Street and the March Air Reserve Base, and west of Indian Street, in the southern portion of the City of Moreno Valley, Riverside County, California. The Project site totals approximately 89.4 acres and is bisected by a flood control channel. Specific details of the proposed project include:

1. Specific Plan Amendment to the Moreno Valley Industrial Area Plan (MVIAP, Specific Plan 208) to reduce the land use buffer distance between the Project site and existing residential development to the east from 300 feet to 100 feet, and to add the requirement for a minimum 50-foot-wide enhanced landscaping zone within the proposed 100-foot buffer area.

*Conserving California's Wildlife Since 1870*

2. Tentative Parcel Map (TPM) to consolidate an approximately 73.4-gross-acre portion of the Project site into two (2) parcels and identify areas of public road dedication and vacation, and the size and location of proposed utility infrastructure improvements.
3. Four Plot Plans for Buildings 1 through 4, including land use plans, architectural plans, and landscape design. Buildings 1 and 2 would be constructed on the east side of the flood control channel and would have a maximum floor area of 1,351,770 square feet and 122,516 square feet, respectively. Buildings 3 and 4 would be constructed on the west side of the flood control channel and would have a maximum floor area of 97,222 square feet and 166,010 square feet respectively.

## COMMENTS AND RECOMMENDATIONS

The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The Department offers the comments and recommendations presented below to assist the City of Moreno Valley (City; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the Department to adequately review and comment on the proposed project with respect to impacts on biological resources and the project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Department recommends that the forthcoming DEIR address the following:

### Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable Department staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. The Department recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. The Department recommends that floristic, alliance- and/or association based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

Aerial photography of the Project site reveals vegetation growth patterns over several years that suggest the potential presence of a vernal complex on the site; therefore, the Department recommends that the DEIR include a vernal pool survey and delineation.

2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. The Department's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or [bdb@dfg.ca.gov](mailto:bdb@dfg.ca.gov) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed project. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at:  
[http://www.dfg.ca.gov/biogeodata/cnddb/submitting\\_data\\_to\\_cnddb.asp](http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp)

Please note that the Department's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. The Department recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the project footprint and within offsite areas with the potential to be effected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the project area and should not be limited to resident species. Focused species-specific/MSHCP surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service, where necessary. Note that the Department generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if the project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.
4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see

<https://www.wildlife.ca.gov/Conservation/Plants>);

5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);

### **Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources**

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the project. To ensure that project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address project-related changes on drainage patterns and water quality within, upstream, and downstream of the project site, including: volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
2. A discussion of potential indirect project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands (e.g. National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. An evaluation of impacts to adjacent open space lands from both the construction of the project and any long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines § 15130. Please include all potential direct and indirect project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

### **Mitigation Measures for Project Impacts to Biological Resources**

The DEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to

occur as a result of the construction and long-term operation and maintenance of the project. When proposing measures to avoid, minimize, or mitigate impacts, the Department recommends consideration of the following:

1. *Sensitive Plant Communities*: The Department considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts.
2. *Mitigation*: The Department considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, including, but not limited to measures to ensure domestic animals (e.g., cats and dogs) cannot access mitigation areas, and removal procedures to implement if they do; proposed land dedications; long-term monitoring and management programs; control of illegal dumping; water pollution; and increased human intrusion, etc.

3. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring

of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

The Department recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

4. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) also afford protective measures as follows: Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

The Department recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the Department recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

5. *Translocation of Species*: The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

### **California Endangered Species Act**

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the California Endangered Species Act (CESA). The Department recommends that a CESA ITP be obtained if the project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the project. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats. The Department encourages early consultation, as significant modification to the proposed project and mitigation measures may be necessary to obtain a CESA ITP. Revisions to the California Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA ITP unless the Project CEQA document addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit.

### **Western Riverside County Multiple Species Habitat Conservation Plan**

Within the Inland Deserts Region, the Department issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County MSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: <http://rctlma.org/epd/WR-MSHCP>.

The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. In order to be considered a covered activity, Permittees must demonstrate that proposed actions are consistent with the MSHCP and its associated Implementing Agreement. The City of Moreno Valley is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. The project is located within the Reche Canyon/Badlands Area Plan of the MSHCP. MSHCP policies and

procedures that apply to the proposed project include the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP section 6.1.2) and Additional Survey Needs and Procedures for burrowing owl (MSHCP section 6.3.2).

The DEIR needs to address how the proposed project will affect the policies and procedures of the MSHCP. Therefore, all surveys required by the MSHCP policies and procedures listed above to determine consistency with the MSHCP should be conducted and results included in the DEIR so that the Department can adequately assess whether the project will impact the MSHCP.

### **Stephens' Kangaroo Rat Habitat Conservation Plan**

The project occurs within the Stephens' kangaroo rat (*Dipodomys stephensi*) Habitat Conservation Plan (SKR HCP) fee area boundary. The SKR HCP provides Take Authorization for Stephens' kangaroo rat within its boundaries, and the MSHCP provides Take Authorization for Stephens' kangaroo rat outside of the boundaries of the SKR HCP, but within the MSHCP area boundaries. The DEIR should identify if any portion of the project will occur on SKR HCP lands, or on Stephens' kangaroo rat habitat lands outside of the SKR HCP, but within the MSHCP. Note that the SKR HCP allows for encroachment into the Stephens' kangaroo rat Core Reserve for public projects, however, there are no provisions for encroachment into the Core Reserve for privately owned projects. If impacts to Stephens' kangaroo rat habitat will occur from the proposed project, the DEIR must specifically identify the total number of permanent impacts to Stephens' kangaroo rat core habitat and the appropriate mitigation to compensate for those impacts.

### **Lake and Streambed Alteration Program**

For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or "entity") is required to provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Please note that streams include all those that flow at least episodically, including ephemeral streams, desert washes, and watercourses with subsurface flow. Based on the notification and supporting information, the Department determines if the proposed project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required.

The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). Therefore, to facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package,

Notice of Preparation of a Draft Environmental Impact Report  
Moreno Valley Logistics Center Project  
SCH No. 2015061040  
Page 9 of 9

please go to <https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

#### Further Coordination

The Department appreciates the opportunity to comment on the NOP of a DEIR for the Moreno Valley Logistics Center Project (SCH No. 2015061040) and recommends that the City of Moreno Valley address the Department's comments and concerns in the forthcoming DEIR. If you should have any questions pertaining to the comments provided in this letter, please contact Gabriele Quillman at (909) 980-3818 or at [gabriele.quillman@wildlife.ca.gov](mailto:gabriele.quillman@wildlife.ca.gov).

Sincerely,

  
Leslie MacNair  
Regional Manager

cc: State Clearinghouse, Sacramento

#### Literature Cited

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2<sup>nd</sup> ed. California Native Plant Society Press, Sacramento, California.  
<http://vegetation.cnps.org/>

**DEPARTMENT OF TRANSPORTATION****DISTRICT 8****PLANNING (MS 722)**464 WEST 4<sup>th</sup> STREET, 6<sup>th</sup> Floor

SAN BERNARDINO, CA 92401-1400

PHONE (909) 383-4557

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TTY (909) 383-6300

www.dot.ca.gov/dist8

*Serious drought  
Help save water!*

June 23, 2015

City of Moreno Valley  
Community Development  
Planning Department  
Julia Descoteaux  
Associate Planner  
29714 Haun Road  
Menifee, CA 92586

Moreno Valley Logistics Center (SPA P15-036, Tentative Parcel Map PA15-0018, Plot Plan PA15-0014, Plot Plan PA15-0015, Plot Plan PA15-0016, and Plot Plan PA15-0017) RIV 215 PM R31.83

Ms. Descoteaux,

We have completed our initial review for the above mentioned proposal of the Notice of Preparation (NOP) of the construction of four (4) distribution warehousing buildings. Building 1-1,351,770 s.f., Building 2-122,516 s.f., building 3-97,222 s.f., and building 4-166,010 s.f.

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. Under the California Environmental Quality Act (CEQA), we are required 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.

We recommend the following to be provided:

**Traffic Study**

- A Traffic Impact Study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities and to propose appropriate mitigation measures. The study should be based on Caltrans' *Guide for the Preparation of Traffic Impact Studies (TIS)* which is located at the following website:  
[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)  
Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.

- Traffic Impact further away from the project is typically not required because a project's potential impacts to the SHS dissipate to less than significant levels as traffic disperses throughout the transportation system.
- The data used in the TIS should not be more than 2 years old.
- The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.
- Traffic Analysis Scenarios should clearly be exhibited as exiting, existing + project, existing + project + cumulative, and existing + project + cumulative + ambient growth.
- Caltrans endeavors that any direct and cumulative impacts to the State highway system be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.
- The LOS for operating State highway facilities is based upon Measures of Effectiveness (MOE) identified in the Highway Capacity Manual (HCM). Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadway segments, and intersections is "D". For undeveloped or not densely developed locations, the goal may be to achieve LOS "C".
- Clearly indicate LOS with and without improvements.
- It is recommended that the Synchro Analysis includes all intersections from the Project site to the proposed study areas. A PHF of 0.92 in urban areas is recommended to be used in the Synchro Analysis.
- All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

- Proposed improvements should be exhibited in preliminary drawings that indicate the LOS with improvements.
- Please submit a hard copy of all Traffic Impact Analysis documents and an electronic Synchro Analysis file.

The City of Moreno Valley and the County of Riverside must ensure the collection of the projects fair share of Transportation Uniform Mitigation Fees (TUMF) and the County Development Impact Fees (DIF) and completion of proposed mitigations.

Prior to your submission for an Encroachment Permit, a follow-up Traffic Study Report letter will be required from the Department of Planning.

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact Talvin Dennis at (909) 806-3957 or myself at (909) 383-4557 for assistance.

Sincerely,



MARK ROBERTS  
Office Chief  
Intergovernmental Review, Community and Regional Planning



**Board of Directors**

July 16, 2015

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Randy A. Record

**Legal Counsel**

Lemieux & O'Neill

Attn: Julia Descoteaux, Associate Planner  
City of Moreno Valley  
Community Development Department  
P.O. Box 88005  
Moreno Valley, CA 92552

**Subject: Notice of Preparation of Draft EIR:  
Moreno Valley Logistics Center (SPA P15-036; TPM PA15-0018;  
Plot Plan PA1515-0014; Plot Plan PA15-0015; Plot Plan PA15-0016;  
Plot Plan PA15-0017. APN's: 316-100-028, -030, -048, -051, -052)**

The subject project requires water, sewer and recycled water services from EMWD. The details of said service connection points will be further detailed in a separate document, known as EMWD's Plan of Service (POS), to be developed by the project proponent.

On December 8, 2014, the subject project was reviewed for Due Diligence with EMWD's New Business Department, with a Project Number WS2014-716.

To date, EMWD has not received a Work Order deposit to develop Plan Of Service for this project.

EMWD's preliminary project requirements include: 1- Construction of on-site and off-site pipeline facilities; 2- The evaluation of potential conflicts between proposed project improvements and existing EMWD facilities; 3- Review of applicable facility easements, such as ensuring un-impeded access to existing easements, and the possibility of securing additional accessibility easements; 4- If proposed medians are located over existing EMWD facilities, such facilities shall be relocated at developer's cost, in accordance with EMWD standards.

If you have questions or concerns, please do not hesitate to contact me.

Sincerely,

Maroun El-Hage, M.S., P.E.  
Senior Civil Engineer  
New Business Development  
(951) 928-3777 x4468  
[El-hagem@emwd.org](mailto:El-hagem@emwd.org)  
ME:emn

Attachment: City of Moreno Valley Notice of Preparation of a Draft EIR

**Mailing Address:** Post Office Box 8300 Perris, CA 92572-8300 Telephone: (951) 928-3777 Fax: (951) 928-6177  
**Location:** 2270 Trumble Road Perris, CA 92570 Internet: [www.emwd.org](http://www.emwd.org)



Community Development Department  
Planning Division  
14177 Frederick Street  
P. O. Box 88005  
Moreno Valley CA 92552-0805  
Telephone: 951.413-3206  
FAX: 951.413-3210

Date: June 17, 2015  
To: Responsible and Trustee Agencies/Interested Organizations and Individuals  
Subject: **Notice of Preparation of a Draft Environmental Impact Report**

**Lead Agency:**

CITY OF MORENO VALLEY  
Community Development Department  
14177 Frederick Street  
PO Box 88005  
Moreno Valley, California 92552  
(951) 413-3209  
Contact: Julia Descoteaux, Associate Planner

**EIR Consulting Firm:**

T&B PLANNING, INC.  
17542 East 17<sup>th</sup> Street  
Suite 100  
Tustin, California 92780  
(714) 397-4224  
Contact: Tracy Zinn, Principal

This Notice of Preparation (NOP) includes an Initial Study (IS) that describes the proposed project and the issues to be examined in an Environmental Impact Report (EIR) as required by the California Environmental Quality Act (CEQA). The documentation is provided in the attached CD for your review and comment.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than 30 days after receipt of this notice or July 17, 2015.

Please send your response to Ms. Julia Descoteaux at the City of Moreno Valley address shown above. Please include the name, phone number, and address of a contact person in your response. If your agency or organization will be a responsible or trustee agency for this Project, please so indicate.

**Project Title: Moreno Valley Logistics Center (Specific Plan Amendment P15-036, Tentative Parcel Map PA15-0018; Plot Plan PA15-0014, Plot Plan PA15-0015, Plot Plan PA15-0016, and Plot Plan PA15-0017)**

**Location:** The project site is located in the southern portion of the City of Moreno Valley, approximately 1.3 miles east of Interstate 215 (I-215), 4.2 miles south of State Route 60 (SR-60), and 2.5 miles northwest of Lake Perris. The project site is located within the geographical limits of the Moreno Valley Industrial Area Plan (MVIAP, Specific Plan 208), which is an area of the City of Moreno Valley designated for Industrial development. At the local scale, the Project site is located south of Krameria Avenue, north of Cardinal Avenue, east of Heacock Street and the March Air Reserve Base, and west of Indian Street. The site lies within the southwestern portion of Section 30, Township 3 South, Range 3 West

(San Bernardino Base and Meridian) and includes Assessor Parcel Numbers 316-100-028, -030, -048, -051, and -052.

**Description:** The proposed Project is described in the IS attached to this NOP. The Project includes the following proposed discretionary actions by the City of Moreno Valley:

- 1) **Specific Plan Amendment (P15-036)** would amend the MVIAP to reduce the land use buffer distance between the project site and existing residential development to the east from 300 feet to 100 feet in order to provide a consistent setback with the distribution warehouse building already constructed immediately north of the project site and to add the requirement for a minimum 50-foot-wide enhanced landscaping zone within the proposed 100-foot buffer area.
- 2) **Tentative Parcel Map No. 36150 (PA15-0018)** proposes to consolidate an approximately 73.4-gross-acre portion of the Project site into two (2) parcels. Proposed Parcel 1 would contain approximately 62.6 net acres and proposed Parcel 2 would contain approximately 6.9 net acres. In addition, TPM No. 36150 identifies areas of public road dedication and vacation, and the size and location of proposed utility infrastructure improvements.
- 3) **Plot Plan PA15-0014** proposes a detailed site plan for Building 1, and includes a land use plan, architectural plans, and landscape design. Building 1 would be constructed with a maximum of 1,351,770 s.f. of total floor space area.
- 4) **Plot Plan PA15-0015** proposes a detailed site plan for Building 2, and includes a land use plan, architectural plans, and landscape design. Building 2 would be constructed with a maximum of 122,516 s.f. of total floor space area.
- 5) **Plot Plan PA15-0016** proposes a detailed site plan for Building 3, and includes a land use plan, architectural plans, and landscape design. Building 3 would be constructed with a maximum of 97,222 s.f. of total floor space area.
- 6) **Plot Plan PA15-0017** proposes a detailed site plan for Building 4, and includes a land use plan, architectural plans, and landscape design. Building 4 would be constructed with a maximum of 166,010 s.f. of total floor space area.

#### **ENVIRONMENTAL ISSUES TO BE EVALUATED IN THE EIR**

The initial environmental review of projects, such as the proposed Moreno Valley Logistics Center project, is normally a three-step process governed by the California Environmental Quality Act (CEQA). The first step is for the lead agency, the City of Moreno Valley, to

determine whether a project is exempt from CEQA review. The City has determined that this project is not exempt. The typical second step is the preparation of an IS to determine potential impacts of the project on the environment. If the IS determines that the project has the potential to cause one or more significant environmental impacts, the usual third step is to determine whether or not an EIR must be prepared.

In this case, the City of Moreno Valley has already determined that an EIR will need to be prepared based on the scale of the project and the potential for the project to cause environmental effects. Therefore, an EIR will be prepared to evaluate those effects.

This NOP and the accompanying IS evaluate submitted applications for a Specific Plan Amendment (P15-036), Tentative Parcel Map (PA15-0018), and four individual Building Plot Plan applications (PA15-0014, PA15-0015, PA15-0016, and PA15-0017) to construct and operate a warehouse distribution center on an approximately 89.4 acre property with four (4) buildings providing 1,737,518 square feet (s.f.) of total floor area. Associated improvements to the property would include loading docks, surface parking areas, drive aisles, roadway improvements, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins.

Based on the information presented in the IS, the following environmental factors will be evaluated in detail in the EIR for the proposed Moreno Valley Logistics Center project:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Transportation/Traffic
- Mandatory Findings of Significance

The IS further describes the anticipated scope of the environmental analysis for each issue.

The EIR will address the short- and long-term effects of the Project on the environment. The EIR also will evaluate the potential for the Project to cause direct and indirect growth-inducing impacts, as well as cumulative impacts. Alternatives to the proposed Project will be evaluated that may reduce or avoid environmental impacts that are determined to be significant in the EIR. A mitigation monitoring program also will be developed as required by Section (§) 15150 of the CEQA Guidelines.

The environmental determination in this NOP is subject to a 30-day public review period per Public Resources Code §21080.4 and CEQA Guidelines §15082. During the public review period, public agencies, interested organizations, and individuals have the opportunity to comment on the proposed Project and identify those environmental issues that have the potential to be affected by the Project and should be addressed further by the City of Moreno Valley in the EIR.

**SCOPING MEETING**

Because the Project meets the CEQA Guidelines §15206 definition of a project having statewide, regional, or areawide significance, the City of Moreno Valley will hold a scoping meeting as specified in CEQA Guidelines §15082(c). The scoping meeting will be held at:

Monday, July 6, 2015  
6:00 – 7:00 p.m.  
City of Moreno Valley, City Hall  
City Council Chambers  
14177 Frederick Street  
Moreno Valley, California 92552

At this meeting, agencies, organizations, and members of the public will be able to hear a brief presentation of the project and provide comments on the scope of the environmental review process for the proposed Moreno Valley Logistics Center project.

Please contact the Community Development Department at (951) 413-3209 if you have any questions.

Sincerely,



Julia Descoteaux  
Associate Planner



Richard Sandzimier  
Planning Official

Johnson & Sedlack

ATTORNEYS at LAW

Raymond W. Johnson, Esq., AICP, LEED GA  
Carl T. Sedlack, Esq., Retired  
Abigail A. Smith, Esq.  
Kimberly Foy, Esq.  
Kendall Holbrook, Esq.

26785 Camino Seco, Temecula, CA 92590

E-mail: Ray@SoCalCEQA.com

Abby@SoCalCEQA.com  
Kim@SoCalCEQA.com  
Kendall@SoCalCEQA.com  
Telephone: (951) 506-9925  
Facsimile: (951) 506-9725

July 8, 2015

Ms. Julia Descoteaux, Associate Planner  
14177 Frederick Street  
PO Box 88005  
Moreno Valley, California 92552  
(951) 413-3209  
juliad@moval.org

**VIA E-MAIL and U.S. MAIL**

***RE: Comments on Notice of Preparation and Initial Study for Moreno Valley Logistics Center (Specific Plan Amendment P15-036, Tentative Parcel Map PA15-0018; Plot Plan PA15-0014, Plot Plan PA15-0015, Plot Plan PA15-0016, and Plot Plan PA15-0017)***

Greetings:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) and Initial Study (IS) prepared for the Proposed Moreno Valley Logistics Center (Specific Plan Amendment P15-036, Tentative Parcel Map PA15-0018; Plot Plan PA15-0014, Plot Plan PA15-0015, Plot Plan PA15-0016, and Plot Plan PA15-0017). Please accept these comments on behalf of Sierra Club and Residents for a Livable Moreno Valley.

The proposed Project involves the development of an approximately 89.4 gross-acre property located at the southwest corner of the intersection of Krameria Avenue and Indian Street in the City of Moreno Valley, Riverside County, California. Development of the property would involve the construction and operation of a warehouse distribution center with one (1) high cube warehouse building and three (3) light industrial buildings with a total building space of 1,737,518 square feet. The Project will include loading docks, surface parking areas (passenger car parking and truck trailer parking), drive aisles, roadway improvements, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins. The Project Applicant is pursuing the Project on a speculative basis, meaning that the proposed buildings' future tenants are not yet identified.

At present there are an enormous number of logistics warehouse buildings approved, built, and proposed in Moreno Valley and surrounding jurisdictions which will rely on the same roadways and highways as this Project. The EIR prepared for this Project should adequately address cumulative traffic, noise, air quality, and health risk impacts from this Project to local and

regional roads including at least Perris Boulevard, Cactus Avenue, Harley Knox Boulevard, I-215, and SR-60. Additionally, Project traffic impacts should be considered beyond an arbitrary radius (e.g. 5 miles) if the Project will potentially impact traffic, individually or cumulatively, at a greater physical distance from the Project site. Traffic impacts to the state highway network should be evaluated pursuant to Caltrans guidelines. Caltrans should be consulted to develop mitigation measures, such as a fair share fee program, for Project and cumulative impacts to the state highway system.

Health risk impacts to sensitive receptors including nearby residences and children attending Rainbow Ridge Elementary School, March Middle School, and/or any other school passed by trucks for this Project should be analyzed and mitigated. Any health risk assessment prepared for the Project should also disclose not only cancer risks associated with diesel PM but also long-term, non-cancer health risks including cardiovascular, respiratory, reproductive, neurological, and developmental problems. The EIR should address whether it is feasible to incorporate or work toward incorporating zero-emission truck technology for this Project.

The IS states, "The parking lot for Building 1 has the option to be striped to provide 472 automobile parking spaces and 242 truck trailer parking spaces, if required by the tenant(s) that occupy the structure.... Under the alternative site plan, Building 2 would be replaced by a parking lot with 166 truck trailer spaces." (IS p. 14) The EIR must evaluate the traffic, air quality, health, GHGs, noise, and other impacts if this option is implemented as this alternative would increase truck-trailer parking at Buildings 1&2 from 346 to 408 total spaces; and would increase automobile parking from 441 to 472 spaces. It is not clear what effect this alternative would have on dock doors, but this should also be addressed in the EIR.

The proposed project Building 1 evidently fails to provide the parking required by City standards. The EIR should address this issue and its potential environmental effects.

The Project proposes a Specific Plan Amendment that would amend the land use buffer requirement specified in the Moreno Valley Industrial Area Plan (MVIAP) Section III, C.1. The amendment would reduce the minimum buffer distance along Indian Street between the Project and the neighboring residents from 300 feet to 100 feet. A 300 foot buffer provides residents some protection from a variety of environmental harms caused by the Project, including noise impacts, greenhouse gases, vibration impacts, glare from the glass, and air quality issues such as diesel particulate matter and odors. Reduction of the buffer zone by 200 feet will cause an increase of environmental harm toward the local residents.

As stated in the MVIAP, the 300 foot setback was intended to provide a buffer between residences and the industrial uses without affecting the integrity of lands available for industrial uses. The EIR should thus consider an alternative to the Project which does not include this Specific Plan Amendment and maintains the required setback of 300 feet. The EIR should also consider alternative projects which would develop the site to other commercial uses, industrial support uses, and/or only other types of industrial, non-warehouse uses (e.g. manufacturing, fabrication).

Cumulative impacts should be thoroughly considered. With respect to traffic, air quality, health risk, biological resources, water quality, and other effects, the EIR should be sure to consider the Shaw Development Company Moreno Valley Distribution Center, First Nandina Logistics, First Inland Logistics Center, Modular Logistics Center, Integra Perris Distribution Center, Optimus Logistics Center (Perris), and the World Logistics Center. Cumulative impacts to agricultural and biological resources should also be evaluated in detail where the Project would further convert agricultural land to warehouse uses and compromise foraging, nesting, and burrowing owl habitat.

The EIR should analyze the potential impacts from constructing storm water runoff outlets into the Perris Valley Storm Drain Channel, which transects the Project site. These outlets could potentially release hazardous materials and create a significant hazard to the public and environment during both the construction and operational phases of the Project. The negative environmental impact includes areas such as the riparian habitats along the channel which connects to the Santa Ana River. Additionally, impacts to hydrology and flood control in the Channel must be evaluated and mitigated where the City has historically experienced drainage problems.

The construction phase of the Project will involve grading, paving, utility installation, building construction, and landscape installation, which would result in the generation of potential water quality pollutants such as silt, debris, and chemicals like paints and solvents. Long-term operation of the Project is anticipated to generate storm water pollutants such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease. The EIR should fully analyze the impacts of the discharging these pollutants into the Perris Valley Storm Drain Channel and should consider diverting the runoff so that it may be treated before being discharged into the channel.

Soils onsite should be tested for contamination from herbicides, pesticides, and fertilizers to ensure that hazardous materials are not emitted from the Project and will not create a hazard to the public or the environment. Sampling must be conducted onsite and the methodology and results of such sampling disclosed in the EIR. Mere sampling of soils transported off-site for disposal is insufficient to ensure the safety of persons and the environment.

A qualified biologist should evaluate the site's existing biological resources and determine the presence or absence of any sensitive species. The results of the biological resources assessment(s) should be disclosed and evaluated in the EIR, paying particular attention to any potential impacts to burrowing owls and available mitigation for such effects.

The IS does not explain why Municipal Code Chapter 9.17.030 requires the removal of existing mature trees on Indian Street. Municipal Code Chapter 9.17.030(E)(7) says "Existing mature trees that cannot be preserved in-place, shall be transplanted elsewhere on the site, unless transplantation is infeasible due to the type or condition of the trees." Therefore, the trees along Indian Street cannot simply be "removed" but instead must be preserved pursuant to these standards.

The IS states that the Project is required to comply with the provisions of the City of Moreno Valley's Development Impact Fee (DIF) Ordinance No. 695 in order to fund public services such as police and fire protection. The EIR should discuss the DIF payments as well as show evidence that the program does in fact have sufficient resources to provide these services and that it already has the services entered into their program. Electricity supply and water supply needs of the building should be disclosed in the EIR, particularly given the effects of these demands on GHGs/ climate change and water supply.

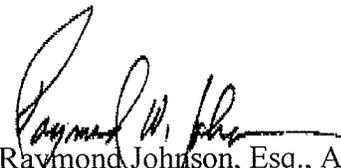
A Water Supply Assessment should be prepared which examines real-world water supply, not "paper water"; accounts for the recent drought; and evaluates whether the Project will comply with the Governor's Executive Order relative to water supply. The IS claims that the Project is consistent with the assumptions made in Eastern Municipal Water District's (EMWD) 2010 Urban Water Management Plan (UWMP). It claims that EMWD has sufficient water supplies available to serve planned land uses within its service area at least through 2035. However, the UWMP does not account for the drought restrictions placed on the entire state by Governor Brown's Executive Order B-29-15. This order places a mandatory 25% reduction on urban water usage based on 2013 usage rates. This reduction when compared to usage from July through September 2014 means that EMWD will actually be forced to reduce their usage by 28%.

As of June 1, 2015, EMWD has moved into stage 4 of its Water Shortage Contingency Plan which means that customers are asked to reduce outdoor watering by 50% and all water used above the amount provided for indoor and outdoor water use will be charged at the highest rate (Tier 4 (Wasteful) water use rate). The EIR should consider the ongoing drought and requirements of Executive Order B-29-15 when evaluating whether or not EMWD can sufficiently supply the water necessary for the project.

Additionally, the EIR should evaluate how the Project will meet the goals of Governor Brown's Executive Order B-30-15 regarding greenhouse gas emissions. The Executive Order places a new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40% below 1990 levels by 2030. The discussion should include what measures the Project will take to meet this goal.

Thank you for your consideration of these comments in your preparation of an EIR for this Project.

Sincerely,



Raymond W. Johnson, Esq., AICP, LEED GA  
JOHNSON & SEDLACK



T 510.836.4200  
F 510.836.4205

410 12th Street, Suite 250  
Oakland, Ca 94607

www.lozeaudrury.com  
richard@lozeaudrury.com

*Via Email and U.S. Mail*

July 15, 2015

Jane Halstead, City Clerk  
City of Moreno Valley Planning and  
Economic Development Department  
14177 Frederick Street  
Moreno Valley, California 92552  
[CityClerk@moval.org](mailto:CityClerk@moval.org)

Richard Sandzimier, Planning Official  
Julia Descoteaux, Associate Planner  
City of Moreno Valley Planning and  
Economic Development Department  
14177 Frederick Street  
Moreno Valley, California 92552  
[juliad@moval.org](mailto:juliad@moval.org)

**Re: CEQA and Land Use Notice Request for the Moreno Valley  
Logistics Center**

Dear All:

I am writing on behalf of the Laborers International Union of North America ("LiUNA"), Local Union 1184 and its members living in the City of Moreno Valley in Riverside County, regarding the Moreno Valley Logistics Center Project (P15-036, PA 15-0014, PA 15-0015, PA 15-0016, PA 15-0017 and PA15-0018, SCH 2015061040), including all actions related or referring to the development of construction and operation of a warehouse distribution center with one (1) high cube warehouse building and three (3) light industrial buildings on the approximately 89.4 gross-acre property located at the southwest corner of the intersection of Krameria Avenue and Indian Street in the City of Moreno Valley, Riverside County, California. ("Project")

We hereby request that the City of Moreno Valley ("City") send by mail and electronic mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

July 15, 2015

CEQA and Land Use Notice Request for the Moreno Valley Logistics Center Project

Page 2 of 3

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”), including, but not limited to:
  - Notices of any public hearing held pursuant to CEQA.
  - Notices of determination that an Environmental Impact Report (“EIR”) is required for a project, prepared pursuant to Public Resources Code Section 21080.4.
  - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
  - Notices of preparation of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21092.
  - Notices of availability of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
  - Notices of approval and/or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
  - Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
  - Notices of determination that a project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
  - Notice of any Final EIR prepared pursuant to CEQA.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

In addition, we request that the City of Moreno Valley send to us via mail and/or email a copy of all Planning Commission and City Council meeting and/or hearing agendas.

July 15, 2015

CEQA and Land Use Notice Request for the Moreno Valley Logistics Center Project

Page 3 of 3

Please send notice by mail and electronic mail to:

Richard Drury  
Theresa Rettinghouse  
Lozeau Drury LLP  
410 12<sup>th</sup> Street, Suite 250  
Oakland, CA 94607  
510-836-4200  
[richard@lozeaudrury.com](mailto:richard@lozeaudrury.com); [theresa@lozeaudrury.com](mailto:theresa@lozeaudrury.com)

Please call should you have any questions. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Theresa Rettinghouse". The signature is written in black ink and is positioned above the printed name and title.

Theresa Rettinghouse  
Paralegal  
Lozeau | Drury LLP



**PECHANGA CULTURAL RESOURCES**  
*Temecula Band of Luiseño Mission Indians*

Post Office, Box 2183 • Temecula, CA 92593  
Telephone (951) 308-9295 • Fax (951) 506-9491

July 20, 2015

**VIA E-MAIL and USPS**

Ms. Julia Descoteaux  
Project Planner  
City of Moreno Valley  
Planning Department  
14177 Frederick Street  
Moreno Valley, CA 92552-0805

**Re: Pechanga Tribe Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Moreno Valley Logistics Center, Tentative Tract Map No. PA15-0018 (36150); SPA P15-036; PP PA15-0014 to -0017**

Dear Ms. Descoteaux:

This comment letter is written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government in response to the Notice of Preparation (NOP) for the above named Project dated June 17, 2015. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). If you have not done so already, please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project and to assist the City in developing appropriate avoidance and preservation standards for the potentially significant Payómkawichum (Luiseño) cultural resources that the Project could impact. The Project area is located within a culturally significant area of Payómkawichum territory and could contain significant and important cultural resources.

The Tribe has not had the opportunity to survey the Property so we do not have specific data on resources located within the Project boundaries. However, as we are not aware of a current archaeological study (within the past 5 years), we recommend that an updated study be conducted, with Pechanga participation, as part of the Draft Environmental Impact (DEIR)

Chairperson:  
Mary Bear Magee

Vice Chairperson:  
Darlene Miranda

Committee Members:  
Evie Gerber  
Bridgett Barcello Maxwell  
Richard B. Searce, III

Director:  
Gary DuBois

Coordinator:  
Paul Macarro

Planning Specialist:  
Tuba Ebru Ozdil

Cultural Analyst:  
Anna Hoover

analysis. The Tribe also recommends that the final archaeological report include an adequate analysis not only of the Project but of the region as well. This area supported a dense pre-contact population and is associated with the Payómkawichum village of *Qaxáalku*.

**THE CITY OF MORENO VALLEY MUST INCLUDE INVOLVEMENT OF AND  
CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL  
REVIEW PROCESS**

It has been the intent of the Federal Government<sup>1</sup> and the State of California<sup>2</sup> that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the project lies within the Pechanga Tribe's traditional territory. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the City of Moreno Valley consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Project effects, as well as generating adequate mitigation measures.

**LEAD AGENCY CONSULTATION WITH THE PECHANGA TRIBE REQUIRED  
PURSUANT TO CAL. GOVT. C. §§ 65351, 65352, 65352.3, AND 65352.4  
(SENATE BILL 18 – TRADITIONAL TRIBAL CULTURAL PLACES LAW)**

As a Specific Plan Amendment is being processed for this Project, the Lead Agency should consult with the Pechanga Tribe pursuant to a State law entitled Traditional Tribal Cultural Places (also known as SB 18; Cal. Govt. C. § 65352.3). The purpose of consultation is to identify any Native American sacred places and any geographical areas which could potentially yield sacred places, identify proper means of treatment and management of such places, and to ensure the protection and preservation of such places through agreed upon mitigation (Cal. Govt. C. 65352.3; SB18, Chapter 905, Section 1(4)(b)(3)). Consultation must be government-to-government, meaning directly between the Tribe and the Lead Agency, seeking agreement where feasible (Cal. Govt. C. § 65352.4; SB18, Chapter 905, Section 1(4)(b)(3)). Lastly, any information conveyed to the Lead Agency concerning Native American sacred places shall be confidential in terms of the specific identity, location, character and use of those places and associated features and objects. This information is not subject to public disclosure pursuant the California Public Records Act (Cal. Govt. C. 6254(r)). The Tribe has received its SB 18 notice from the City and submitted a response letter on May 15, 2015. We look forward to beginning our consultation on this Project.

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<sup>1</sup> See e.g., Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments, Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments, Executive Memorandum of September 23, 2004 on Government-to-Government Relationships with Tribal Governments, and Executive Memorandum of November 5, 2009 on Tribal Consultation.

<sup>2</sup> See California Public Resource Code §5097.9 et seq.; California Government Code §§65351, 65352.3 and 65352.4

## PECHANGA CULTURAL AFFILIATION TO PROJECT AREA

The Pechanga Tribe asserts that the Project area is part of *Payómkawichum* (Luiseño), and therefore the Tribe's, aboriginal territory as evidenced by the existence of *Payómkawichum* place names, *tóota yixélval* (rock art, pictographs, petroglyphs), a village complex (*Qaxáalku*) and an extensive Luiseño artifact record in the vicinity of the Project. The Tribe further asserts that this culturally sensitive area is affiliated specifically with the Pechanga Band of Luiseño Indians because of the Tribe's specific cultural ties to this area. The Tribe considers any resources located on this Project property to be Pechanga cultural resources.

The Pechanga Tribe's knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Of the many anthropologists and historians who have presented boundaries of the *Payómkawichum* (Luiseño) traditional territory, few have excluded the Project area in their descriptions (Drucker 1937; Heiser and Whipple 1957; Kroeber 1925; Smith and Freers 1994), and such territory descriptions correspond with what was communicated to the Pechanga people by our elders. While we agree that anthropological and linguistic theories as well as historic accounts are important in determining traditional Luiseño territory, the most critical sources of information used to define our traditional territories are our songs, creation accounts and oral traditions.

*Payómkawichum* history originates with the creation of all things at '*éxva Teméeku*, in the present day City of Temecula, and dispersing out to all corners of creation (what is today known as Luiseño territory). It was at Temecula that the Luiseño deity *Wuyóot* lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore. Many of our songs relate the tale of the people taking the dying *Wuyóot* to the many hot springs in the area and finally to the hot springs at Elsinore, where he died (DuBois 1908). He was cremated at '*éxva Teméeku*. It is the Luiseño creation account that connects Elsinore to Temecula, and thus to the Temecula people who were evicted and moved to the Pechanga Reservation, and now known as the Pechanga Band of Luiseño Mission Indians (the Pechanga Tribe). From Elsinore, the people spread out, establishing villages and marking their territories in the surrounding areas such as Moreno Valley, Perris, Mead Valley, etc. The first people also became the mountains, plants, animals and heavenly bodies.

Many traditions and stories are passed from generation to generation by songs. One of the Luiseño songs recounts the travels of the people to Elsinore after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Káamalam/Moníivol*, are songs of the places and landmarks that were destinations of the Luiseño ancestors, several of which are located near the Project area. They describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their migrations (DuBois 1908:110). In addition, Pechanga elders state that the Temecula/Pechanga people had usage/gathering rights to an area extending from Rawson Canyon on the east, over to

Lake Mathews on the northwest, down Temescal Canyon to Temecula, eastward to Aguanga, and then along the crest of the Cahuilla range back to Rawson Canyon. The Project area is located within the central area of this culturally affiliated territory. The Native American Heritage Commission (NAHC) Most Likely Descendent (MLD) files substantiate this habitation and migration record from oral tradition. These examples illustrate a direct correlation between the oral tradition and the physical place; proving the importance of songs and stories as a valid source of information outside of the published anthropological data.

*Tóota yixélval* (rock art) is also an important element in the determination of Luiseño territorial boundaries. *Tóota yixélval* can consist of petroglyphs (incised) elements, or pictographs (painted) elements. The science of archaeology tells us that places can be described through these elements. Riverside and Northern San Diego Counties are home to red-pigmented pictograph panels. Archaeologists have adopted the name for these pictograph-versions, as defined by Ken Hedges of the Museum of Man, as the San Luis Rey style. The San Luis Rey style incorporates elements which include chevrons, zig-zags, dot patterns, sunbursts, handprints, net/chain, anthropomorphic (human-like) and zoomorphic (animal-like) designs. Tribal historians and photographs inform us that some design elements are reminiscent of Luiseño ground paintings. A few of these design elements, particularly the flower motifs, the net/chain and zig-zags, were sometimes depicted in Luiseño basket designs and can be observed in remaining baskets and textiles today.

An additional type of *tóota yixélval*, identified by archaeologists also as rock art or petroglyphs, are cupules. Throughout Luiseño territory, there are certain types of large boulders, taking the shape of mushrooms or waves, which contain numerous small pecked and ground indentations, or cupules. Many of these cupule boulders have been identified within a few miles of the Project. Additionally, according to historian Constance DuBois:

When the people scattered from Ekvo Temeko, Temecula, they were very powerful. When they got to a place, they would sing a song to make water come there, and would call that place theirs; or they would scoop out a hollow in a rock with their hands to have that for their mark as a claim upon the land. The different parties of people had their own marks. For instance, Albañas's ancestors had theirs, and Lucario's people had theirs, and their own songs of Munival to tell how they traveled from Temecula, of the spots where they stopped and about the different places they claimed (1908:158).

This Project property is located to the east of one of the densest Payómkawichum village complexes known as *Qaxáalku*. The etymology of the Spanish word Cajalco derives from the Luiseño word for "place of quail." The suffix "ku" is considered a more archaic form of the suffix "anga," which means "place of" (as in Pech-anga...place of dripping water). Throughout the region containing *Qaxáalku* there are still quail but almost as important are the *kukíulam*, or burrowing owl, that once lived there in large numbers. The areas separated by low-lying bedrock boulders provide an ideal habitat for the owls. J.P. Harrington's/Pechanga informant

Celestine Ahuayo relates: *“the (that type of) area was known as kukiulam pomki, which means where the ground owl houses.”* Kukiul/burrowing owl is important for the Luiseño because of his status in our Creation Story. Father Boscana wrote of the burrowing owl’s role in the Story: *‘It was determined by (the lower animals) that Father Wuyóot should received his death by means of poison. Kukiulmal (the small burrowing owl) perceived this and immediately gave the information to Wuyóot.’* Eventually, Wuyóot did succumb to poison but the burrowing owl gained a distinction in our Luiseño songs as a good messenger. The Payómkawichum would have revered the area where this “good apostle” lived by living there as well.

Within the *Qaxáalku* complex, there are at least seven recorded cupule boulders and many others with painted markings (pictographs). Additionally, beyond the numerous bedrock mortars and slicks, are four ancestral quartz quarries. Quartz points were important to the *Payómkawichum* because it is taught that *Suukat* (deer), who gave his life for the starving People in our Creation Story, could only be taken by a point made of quartz.

The Project area, located on the northern end of the floor of Perris Valley, is surrounded by culturally sensitive features. As stated above, to the west is the *Qaxáalku* complex; to the south is the San Jacinto River and to the southeast is Lake Perris, which includes known sacred/ceremonial sites. Further, our oral traditions state that there were trade and transportation routes that passed through this area. In relation to documented archaeological studies, the Project is immediately adjacent to March Air Reserve Base (MARB). The Tribe has been designated as the affiliated Tribe by LSA Associates for the March Joint Powers Authority and the MARB (Schroth 1999).

Thus, our songs and stories, our indigenous place names, as well as academic works, demonstrate that the Luiseño people who occupied what we know today as Moreno Valley and the areas in between, are ancestors of the present-day Payómkawichum, and as such, Pechanga is culturally affiliated to this geographic area.

The Tribe welcomes the opportunity to meet with the City to further explain and provide documentation concerning our specific cultural affiliation to lands associated with this Project.

### **PROJECT IMPACTS TO CULTURAL RESOURCES AND TRIBAL INVOLVEMENT**

The proposed Project is located in a sensitive region of Payómkawichum territory and the Tribe knows that the current development has the potential to destroy sensitive and important cultural resources. The Tribe has over thirty-five (35) years of experience in working with various types of construction projects throughout its territory. The combination of this knowledge and experience, along with the knowledge of the culturally-sensitive areas and oral tradition, is what the Tribe relies on to make fairly accurate predictions regarding the likelihood of subsurface resources in a particular location.

The Pechanga Tribe is not opposed to this Project; however, we are opposed to any impacts this Project may have to tribal cultural resources. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work. The Tribe requests to be involved and participate with the City of Moreno Valley in assuring that an adequate environmental assessment is completed, including all archaeological studies and analysis, and in developing all preservation, avoidance, monitoring and mitigation plans and measures for the duration of the Project.

The CEQA Guidelines state that lead agencies should make provisions for inadvertent discoveries of cultural resources (CEQA Guidelines §15064.5). The Tribe believes that adequate cultural resources assessments and management must always include a component which addresses inadvertent discoveries. Every major State and Federal law dealing with cultural resources includes provisions addressing inadvertent discoveries (See e.g.: CEQA (Cal. Pub. Resources Code §21083.2(i); 14 CCR §15065.5(f)); Section 106 (36 CFR §800.13); NAGPRA (43 CFR §10.4). Moreover, most state and federal agencies have guidelines or provisions for addressing inadvertent discoveries (See e.g.: FHWA, Section 4(f) Regulations - 771.135(g); CALTRANS, Standard Environmental Reference - 5- 10.2 and 5-10.3). Because of the extensive presence of the Tribe's ancestors within the Project area, it is not unreasonable to expect to find vestiges of that presence. Such cultural resources and artifacts are significant to the Tribe as they are reminders of their ancestors. Moreover, the Tribe is expected to protect and assure that all cultural sites of its ancestors are appropriately treated in a respectful manner. Therefore, as noted previously, it is crucial to adequately address the potential for inadvertent discoveries.

Further, the Pechanga Tribe believes that if human remains are discovered, State law would apply and the mitigation measures in the EIR must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage Commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains. Given the Project's location in Pechanga territory, the Pechanga Tribe intends to assert its right pursuant to California law with regard to any remains or items discovered in the course of this Project.

### **RECOMMENDATIONS FOR DEIR ANALYSIS**

The Tribe further believes that a DEIR is not complete unless all impacts to cultural resources has been thoroughly vetted and analyzed, especially concerning the auditory and visual impacts, cumulative impacts and the growth-related or long-term impacts that a Project will have. As discussed above, numerous habitation areas are located in close proximity to the Project. The development of the proposed warehouse/industrial buildings may directly impact

the sightlines of these habitations to the Lake Perris area and could potentially obscure the viewsheds of sacred/ceremonial sites from Lake Perris to *Qaxáalku*. The sheer size of the building will be seen and the truck traffic will be heard for miles and may be a visual impediment to the scenic beauty of this region. It will further affect the natural quietness of the area. Because of the size, complexity and impact the Project will have on the surrounding landscape, visual and auditory impacts to cultural resources should be thoroughly evaluated within the final document, including potentially conducting a viewshed analysis document, to determine whether line-of-sight obstructions will impact the sensitive resources in the area. The DEIR should take into account not only any cultural resources that are located within the Project boundaries (including any off-site improvements), but also the villages surrounding the Project, regardless whether they exist within an arbitrary one-mile radius, that might be impacted as well.

Cumulative impacts are also a major concern for the Tribe. The destruction of any “individual” cultural resource is detrimental to the whole cultural landscape and serves to further destroy the Tribe’s traditional ancestral places. Unfortunately, most of the traditional ancestral places of the Tribe are on private and public lands which are constantly threatened by development. The Tribe is not anti-development; however, we increasingly struggle with lead agencies to protect and preserve our invaluable resources which continue to be destroyed and impacted on nearly a daily basis. Improper recordation and analysis of features within a larger community or habitation context allows for the piecemealing of sites and which can result in improper eligibility determinations which leads ultimately to damage or destruction. It is important to acknowledge in Project documentation that these are not renewable resources and thus the impairment or destruction of any site or resource IS a cumulative impact.

Additionally, with the proposed Project, the huge influx of truck traffic and vehicles will increase air pollution. The smog and other pollutants build up on adjacent boulder outcrops. Very little research has been conducted to determine the effects of air pollutants on boulder outcrops and rock art; however, the Tribe knows that the constant exposure of acidic elements in the air will erode the delicate pigments left on the rocks. This kind of indirect and cumulative impact needs to be addressed in more detail in the final document as there are significant *tóota yixélval* within a very close proximity to the Project. As such, the document must address these kinds of impacts.

Finally, the Tribe is concerned about growth-related impacts to this area and their effects on cultural resources. We know that development brings people, and if people are not educated or aware of the importance of cultural resources, the resources will suffer through vandalism, looting, graffiti or destruction. Based upon the current archaeological methodology, there is a high probability that these sites will to be subjected to site-by-site analysis and not viewed in their proper context. Because the Project’s archaeological reports, including all archaeological studies, will be submitted to the Eastern Information Center (EIC) – the clearinghouse for such documents and the location archaeologists first go to for information, the Tribe requests that the City of Moreno Valley set a precedent and require that the Project archaeologist address the both

Pechanga Comment Letter to the City of Moreno Valley  
Re: Pechanga Tribe Comments on the NOP for an DEIR on TR 36150  
July 20, 2015  
Page 8

Project sites and the regional context in the study in order to assist future archaeologists and developers with awareness, preservation and avoidance.

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts.

The Pechanga Tribe looks forward to working together with the City of Moreno Valley in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8104 or at [ahover@pechanga-nsn.gov](mailto:ahover@pechanga-nsn.gov) so we can schedule a meeting if desired. Thank you.

Sincerely,



Anna Hoover  
Cultural Analyst

Cc Pechanga Office of the General Counsel



# AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY

**RECEIVED**

JUL 20 2015

CITY OF MORENO VALLEY  
Planning Division

July 14, 2015

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County Administrative Center  
4080 Lemon St, 14<sup>th</sup> Floor  
Riverside, CA 92501  
(951) 955-5132

[www.rcaluc.org](http://www.rcaluc.org)

Ms. Julia Descoteaux, Associate Planner  
City of Moreno Valley Community Development Department  
Planning Division  
14177 Frederick Street  
P. O. Box 88005  
Moreno Valley, CA 92552-0805

**RE: Moreno Valley Logistics Center (PA15-0014 through PA15-0018 and P15-036) Initial Study and Notice of Preparation**

Dear Ms. Descoteaux:

Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a copy of the Notice of Preparation of a Draft Environmental Impact Report (EIR) and a CD copy of the Initial Study for City of Moreno Valley Planning Case Nos. PA15-0014 through PA15-0018 and P15-036, corresponding to a proposal for development of a four-building warehouse and logistics center with a combined floor area of 1,702,518 square feet, along with an amendment to Specific Plan No. 208 and a tentative parcel map.

As noted in previous correspondence, an official submittal of the project to ALUC for a determination as to consistency is mandatory.

The Initial Study (page 26) cites glare as a potentially significant impact to be studied in the required EIR and points out the possibility that roof mounted solar panels could potentially be installed on portions of the building roofs. We recommend that the Solar Glare Hazard Analysis Tool (SGHAT) (as recognized by the Federal Aviation Administration) be utilized to evaluate the potential for glare impacts on aviation activities, particularly aircraft departing from or approaching the runway at March Air Reserve Base/Inland Port Airport.

While the excellent Project Description acknowledges (page 20) that “permits and approvals may be required from other public entities,” citing ALUC among their number, the discussion of issues in the remainder of the Initial Study does not address the criteria of the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. On page 37, the discussion of safety hazards references the fact that the property is not in an Accident Potential Zone as a basis for concluding that “implementation of the proposed Project would not result in a safety hazard” and that this issue does not require further study in the required EIR. However, this conclusion may be premature in that the project has not yet been reviewed for consistency with the intensity limits of Compatibility Zone C1.

Additionally, the Environmental Impact Report should address the measures that will be taken to ensure that the on-site detention basins will not become a wildlife attractant that could impact the

**AIRPORT LAND USE COMMISSION**

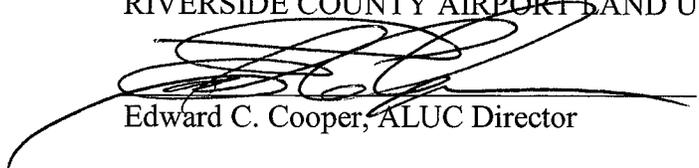
**July 14, 2015**

safety of aircraft in flight.

If you have any questions, please contact John Guerin, ALUC Principal Planner, at (951) 955-0982.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION



Edward C. Cooper, ALUC Director

cc: Richard Sandzimier, Planning Official, City of Moreno Valley

Y:\AIRPORT CASE FILES\March\Mo Val Logistics Center NOP Initial Study - ltr to Mo Val.doc

## David Ornelas

---

**From:** Daniel McCarthy <DMcCarthy@sanmanuel-nsn.gov>  
**Sent:** Monday, June 22, 2015 4:45 PM  
**To:** Julia Descoteaux  
**Subject:** Moreno Valley Logistics Center SPA P15-036, et al

Julia,

I received the NOP for the proposed Logistic Center today. The project is located within the Tribe's ancestral territory. We do not have any information about significant Native American cultural resources at the project location, but are aware that there are such resources in the general area. Please forward a copy of the archaeological records search results when available as well as a copy of the draft cultural resources report(s) for continued review. After reviewing these documents we will be able to provide further comments.

Please keep the Tribe on your list to receive future project notices and documentation, as well.

Thank you,  
Daniel

Daniel McCarthy MS, RPA  
Director - CRM Department  
San Manuel Band of Mission Indians  
26569 Community Center Drive  
Highland, CA 92346

**THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW.** If the reader of this message is not the intended recipient or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination or copying of this communication is strictly prohibited. If you have received this electronic transmission in error, please delete it from your system without copying it and notify the sender by reply e-mail so that the email address record can be corrected. Thank You



July 16, 2015

Ms. Julia Descoteaux, Associate Planner  
City of Moreno Valley, Community Development Department  
14177 Frederick Street  
PO Box 88005  
Moreno Valley, California 92552  
Phone: (951) 413-3209  
Email: juliad@moval.org

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Moreno Valley Logistics Center [SCAG NO. IGR8534]**

Dear Ms. Descoteaux,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Moreno Valley Logistics Center ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Moreno Valley Logistics Center in Riverside County. The proposed project includes construction of four industrial buildings totaling 1,737,518 square feet on a 73.4 acre project site. The proposed project also includes a Specific Plan Amendment to reduce current land use buffer distances between the project site and existing residential development and a Tentative Parcel Map to consolidate the project site into two parcels.

**When available, please send environmental documentation to SCAG's office in Los Angeles or by email to [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov) providing, at a minimum, the full public comment period for review.** If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov). Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Ping Chang'.

Ping Chang  
Program Manager II, Land Use and Environmental Planning

<sup>1</sup> SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**Main Office**  
818 West Seventh Street  
12th Floor  
Los Angeles, California  
90017-3435  
t (213) 236-1800  
f (213) 236-1825  
[www.scag.ca.gov](http://www.scag.ca.gov)

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Alan Wapner, San Bernardino  
Associated Governments

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE MORENO VALLEY LOGISTICS CENTER [SCAG NO. IGR8534]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

**2012 RTP/SCS GOALS**

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

<b>SCAG 2012 RTP/SCS GOALS</b>	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference
etc.	etc.

**RTP/SCS STRATEGIES**

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

**REGIONAL GROWTH FORECASTS**

At the time of this letter, the most recently adopted SCAG forecasts consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts		Adopted City of Moreno Valley Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	213,700	255,200
Households	6,458,000	7,325,000	60,000	72,800
Employment	8,414,000	9,441,000	48,000	64,400

**MITIGATION**

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: [http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012FPEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012FPEIR_AppendixG_ExampleMeasures.pdf)



South Coast  
Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

RECEIVED  
JUL 21 2015  
CITY OF MORENO VALLEY  
Planning Division

July 9, 2015

Julia Descoteaux, Associate Planner  
City of Moreno Valley  
Community Development Department  
14177 Frederick Street  
PO Box 8805  
Moreno Valley, CA 92552

**Notice of Preparation of a Draft EIR Document for the  
Moreno Valley Logistics Center**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft EIR document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)).

SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g.,

heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*) can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. This document may be helpful when evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

### **Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD mitigation measures and control efficiencies CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/greenhouse-gases>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions <http://www.aqmd.gov/home/programs/business/training-403-403-1-fugitive-dust>.
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. This document can be found at the following internet address:

<http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

**SCAQMD Recommendation for Truck Trip Rates for High Cube Warehouse Projects**

SCAQMD recommends the use of truck trip rates from the Institute of Transportation Engineers (ITE) for high cube warehouse projects located in SCAQMD (i.e. 1.68 average daily vehicle trips per 1,000 s.f. and 0.64 average daily truck trips per 1,000 s.f.). Consistent with CEQA Guidelines, the EIR may use a non-default trip rate if there is substantial evidence indicating another rate is more appropriate for the air quality analysis.

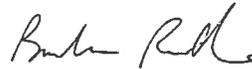
For high cube warehouse projects, the SCAQMD staff has been working on a Warehouse Truck Trip Study to better quantify trip rates associated with local warehouse and distribution projects, as truck emission represent more than 90 percent of air quality impacts from these projects. Details regarding this study can be found online here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/high-cube-warehouse>

**Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [Bradlein@aqmd.gov](mailto:Bradlein@aqmd.gov) or call me at (909) 396-2716.

Sincerely,



Barbara Radlein  
Program Supervisor  
Planning, Rule Development & Area Sources

RVC150619-03  
Control Number



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

Notice of Preparation

June 16, 2015

RECEIVED

JUN 22 2015

CITY OF MORENO VALLEY  
Planning Division

To: Reviewing Agencies

Re: Moreno Valley Logistics Center  
SCH# 2015061040

Attached for your review and comment is the Notice of Preparation (NOP) for the Moreno Valley Logistics Center draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Julia Descoteaux  
City of Moreno Valley  
14177 Frederick Street  
PO Box 88055  
Moreno Valley, CA 92552

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2015061040  
**Project Title** Moreno Valley Logistics Center  
**Lead Agency** Moreno Valley, City of

---

**Type** NOP Notice of Preparation  
**Description** Project includes four Plot Plans to provide for the construction and operation of a warehouse distribution center with four buildings providing 1,737,518 s.f. of total floor space. Associated improvements to the property would include loading docks, surface parking areas (automobile parking and truck trailer parking), drive aisles, roadway improvements, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins. The Project also includes a Specific Plan Amendment to modify land use buffering and landscape requirements applicable to the subject property and a Tentative Parcel Map to consolidate a 73.4 acre portion of the site into two parcels.

---

**Lead Agency Contact**

**Name** Julia Descoteaux  
**Agency** City of Moreno Valley  
**Phone** 951-413-3209 **Fax**  
**email**  
**Address** 14177 Frederick Street  
PO Box 88055  
**City** Moreno Valley **State** CA **Zip** 92552

---

**Project Location**

**County** Riverside  
**City** Moreno Valley  
**Region**  
**Cross Streets** Krameria Ave and Indian Street  
**Lat / Long** 33° 52' 40" N / 117° 14' 17" W  
**Parcel No.** Various  
**Township** 3S **Range** 3W **Section** 30 **Base** San Bern

---

**Proximity to:**

**Highways** I-215  
**Airports** March ARB  
**Railways** BNSF  
**Waterways** Lake Perris, Perris Valley Storm Drain Channel  
**Schools** Ranbow Ridge, March  
**Land Use** Present Land Use: Undeveloped; Zoning Designation: Industrial; General Plan Designation: Business Park/Light Industrial

---

**Project Issues** Aesthetic/Visual; Air Quality; Agricultural Land; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Noise; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

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**Reviewing Agencies** Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 6; Native American Heritage Commission; Caltrans, District 8; Air Resources Board; Regional Water Quality Control Board, Region 8

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**Date Received** 06/16/2015 **Start of Review** 06/16/2015 **End of Review** 07/15/2015

2015061040

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Moreno Valley Logistics Center

Lead Agency: City of Moreno Valley

Contact Person: Julia Descoteaux

Mailing Address: 14177 Frederick Street, P.O. Box 88055

Phone: (951) 413-3209

City: Moreno Valley

Zip: 92552

County: Riverside

Project Location: County: Riverside

City/Nearest Community: Moreno Valley

Cross Streets: Krameria Avenue and Indian Street

Zip Code: 92551

Longitude/Latitude (degrees, minutes and seconds): 33 ° 52 ' 40 " N / 117 ° 14 ' 17 " W Total Acres: 89.4

Assessor's Parcel No.: \* See bottom of page

Section: 30

Twp.: 3 South

Range: 3 West

Base: San Bern.

Within 2 Miles: State Hwy #: I-215

Waterways: Lake Perris, Perris Valley Storm Drain Channel

Airports: March ARB

Railways: BNSF

Schools: Rainbow Ridge, March

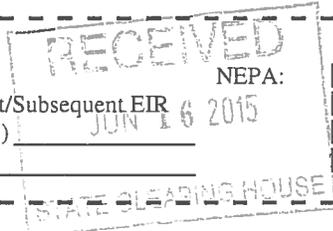
Document Type:

- CEQA: [X] NOP [ ] Early Cons [ ] Neg Dec [ ] Mit Neg Dec

- [ ] Draft EIR [ ] Supplement/Subsequent EIR (Prior SCH No.) [ ] Other:

- NEPA: [ ] NOI [ ] EA [ ] Draft EIS [ ] FONSI

- Other: [ ] Joint Document [ ] Final Document [ ] Other:



Local Action Type:

- [ ] General Plan Update [ ] General Plan Amendment [ ] General Plan Element [ ] Community Plan

- [X] Specific Plan [ ] Master Plan [ ] Planned Unit Development [X] Site Plan

- [ ] Rezone [ ] Prezone [ ] Use Permit [X] Land Division (Subdivision, etc.)

- [ ] Annexation [ ] Redevelopment [ ] Coastal Permit [ ] Other:

Development Type:

- [ ] Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_
[ ] Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_
[ ] Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_
[X] Industrial: Sq.ft. 1.7m Acres 89.4 Employees \_\_\_\_\_
[ ] Educational: \_\_\_\_\_
[ ] Recreational: \_\_\_\_\_
[ ] Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_

- [ ] Transportation: Type \_\_\_\_\_
[ ] Mining: Mineral \_\_\_\_\_
[ ] Power: Type \_\_\_\_\_ MW \_\_\_\_\_
[ ] Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_
[ ] Hazardous Waste: Type \_\_\_\_\_
[ ] Other: \_\_\_\_\_

Project Issues Discussed in Document:

- [X] Aesthetic/Visual [X] Agricultural Land [X] Air Quality [X] Archeological/Historical [X] Biological Resources [ ] Coastal Zone [X] Drainage/Absorption [ ] Economic/Jobs

- [ ] Fiscal [X] Flood Plain/Flooding [ ] Forest Land/Fire Hazard [ ] Geologic/Seismic [ ] Minerals [X] Noise [ ] Population/Housing Balance [ ] Public Services/Facilities

- [ ] Recreation/Parks [ ] Schools/Universities [ ] Septic Systems [ ] Sewer Capacity [X] Soil Erosion/Compaction/Grading [ ] Solid Waste [X] Toxic/Hazardous [X] Traffic/Circulation

- [X] Vegetation [X] Water Quality [X] Water Supply/Groundwater [X] Wetland/Riparian [X] Growth Inducement [X] Land Use [X] Cumulative Effects [X] Other: Greenhouse Gas

Present Land Use/Zoning/General Plan Designation:

Present Land Use: Undeveloped; Zoning Designation: Industrial; General Plan Designation: Business Park/Light Industrial

Project Description: (please use a separate page if necessary)

The Project includes four Plot Plans to provide for the construction and operation of a warehouse distribution center with four buildings providing 1,737,518 s.f. of total floor space. Associated improvements to the property would include loading docks, surface parking areas (automobile parking and truck trailer parking), drive aisles, roadway improvements, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins. The Project also includes a Specific Plan Amendment to modify land use buffering and landscape requirements applicable to the subject property and a Tentative Parcel Map to consolidate a 73.4-acre portion of the site into two parcels.

\*APNs: 316-100-028, 316-100-030, 316-100-048, 316-100-051, and 316-100-052.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Resources Agency

Resources Agency  
Nadell Gayou

Dept. of Boating & Waterways  
Denise Peterson

California Coastal Commission  
Elizabeth A. Fuchs

Colorado River Board  
Lisa Johansen

Dept. of Conservation  
Elizabeth Carpenter

California Energy Commission  
Eric Knight

Cal Fire  
Dan Foster

Central Valley Flood Protection Board  
James Herola

Office of Historic Preservation  
Ron Parsons

Dept of Parks & Recreation Environmental Stewardship Section

California Department of Resources, Recycling & Recovery  
Sue O'Leary

S.F. Bay Conservation & Dev't. Comm.  
Steve McAdam

Dept. of Water Resources Agency  
Nadell Gayou

Fish and Game

Dept. of Fish & Wildlife  
Scott Flint  
Environmental Services Division

Fish & Wildlife Region 1  
Curt Babcock

Fish & Wildlife Region 1E  
Laurie Harnsberger

Fish & Wildlife Region 2  
Jeff Drongesen

Fish & Wildlife Region 3  
Charles Armor

Fish & Wildlife Region 4  
Julie Vance

Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program

Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program

Fish & Wildlife Region 6 I/M  
Heidi Calvert  
Inyo/Mono. Habitat Conservation Program

Dept. of Fish & Wildlife Marine Region  
George Isaac

Other Departments

Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture

Dept. of General Services  
Public School Construction

Dept. of General Services  
Anna Garbeff  
Environmental Services Section

Delta Stewardship Council  
Kevan Samsam

Housing & Comm. Dev. CEQA Coordinator  
Housing Policy Division

Independent Commissions, Boards

Delta Protection Commission  
Michael Machado

OES (Office of Emergency Services)  
Marcia Scully

Native American Heritage Comm.  
Debbie Treadway

Public Utilities Commission  
Leo Wong

Santa Monica Bay Restoration  
Guangyu Wang

State Lands Commission  
Jennifer Deleong

Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

Cal State Transportation Agency CalSTA

Caltrans - Division of Aeronautics  
Philip Crimmins

Caltrans - Planning HQ LD-IGR  
Terri Pencovic

California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

Dept. of Transportation

Caltrans, District 1  
Rex Jackman

Caltrans, District 2  
Marcelino Gonzalez

Caltrans, District 3  
Eric Federicks - South  
Susan Zanchi - North

Caltrans, District 4  
Patricia Maurice

Caltrans, District 5  
Larry Newland

Caltrans, District 6  
Michael Navarro

Caltrans, District 7  
Dianna Watson

Caltrans, District 8  
Mark Roberts

Caltrans, District 9  
Gayle Rosander

Caltrans, District 10  
Tom Dumas

Caltrans, District 11  
Jacob Armstrong

Caltrans, District 12  
Maureen El Harake

Cal EPA

Air Resources Board

All Other Projects  
Cathi Slaminski

Transportation Projects  
Nesamani Kalandiyur

Industrial/Energy Projects  
Mike Tollstrup

State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

State Water Resources Control Board  
Jeffery Werth  
Division of Drinking Water

State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

State Water Resources Control Board  
Phil Crader  
Division of Water Rights

Dept. of Toxic Substances Control  
CEQA Tracking Center

Department of Pesticide Regulation  
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

RWQCB 1  
Cathleen Hudson  
North Coast Region (1)

RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)

RWQCB 3  
Central Coast Region (3)

RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)

RWQCB 5S  
Central Valley Region (5)

RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

RWQCB 6  
Lahontan Region (6)

RWQCB 6V  
Lahontan Region (6)  
Victonville Branch Office

RWQCB 7  
Colorado River Basin Region (7)

RWQCB 8  
Santa Ana Region (8)

RWQCB 9  
San Diego Region (9)

Other \_\_\_\_\_

\_\_\_\_\_  
Conservancy

## David Ornelas

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**From:** David Ornelas  
**Sent:** Monday, July 13, 2015 11:25 AM  
**To:** Julia Descoteaux (juliad@moval.org)  
**Cc:** Tracy Zinn  
**Subject:** Moreno Valley Logistics Center - Public Comment

Hi, Julia:

One of the attendees from the EIR Scoping Meeting, Ms. Stephanie Grosveld, called T&B Planning this morning with comments regarding the CEQA analysis for the Moreno Valley Logistics Center project. The comments provided by Ms. Grosveld are below; please include these comments in the project's file with the other NOP and Scoping Meeting comments.

Comments received by Tracy Zinn of T&B Planning on the Moreno Valley Logistics Center EIR NOP, from Stephanie Grosveld - by phone on July 13, 2015, 10:19-10:29 AM.

1. Concerned about low attendance at the scoping meeting. Concerned that there was not enough notification of the meeting to surrounding property owners.
2. Concerned that the future occupants of the buildings are not yet identified.
3. Concerned about the vacancy rates of warehouse buildings - she indicated that several are empty.
4. Concerned about the amount of pollution and noise that the project would cause to properties on the opposite side of Krameria Avenue and Indian Street.
5. Concerned about pollution from large trucks.
6. Concerned that the public school system is not training for jobs that the warehouses would create. Would like to see changes in the education system for specific job training.
7. Concerned about the amount of money that the public school system is spending on education, to train for jobs that don't exist in the U.S.
8. Concerned that the warehouses in Moreno Valley are storage spaces for goods produced overseas. Would like to see U.S. manufacturing jobs in Moreno Valley and the surrounding area. Concerned that the warehouses are furthering the much larger problem of foreign good imports, which are taking away from U.S. jobs.

**David Ornelas**  
*Project Manager*



**T&B PLANNING, INC.**

Phone: (619) 501-6041

[dornelas@tbplanning.com](mailto:dornelas@tbplanning.com)

[www.tbplanning.com](http://www.tbplanning.com)

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