

May 17, 2012

Project No. 111061-126

Highland Fairview  
14225 corporate Way  
Moreno Valley, California 92553

Attention: Mr. Brian Hixson

**Subject: Response to Review Comments to “Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)”, World Logistics Center (WLC) Specific Plan, Moreno Valley, California**

In accordance with your request, Leighton and Associates, Inc. (Leighton) has prepared in response to the comments prepared by Mr. Gerald Budlong dated March 22, 2012 and Mr. Michael McKibben, Ph.D. dated March 25, 2012.

**Response to Mr. Budlong (Item No. 2, Geology and Soils)**

An onsite geologic, geotechnical and earthquake hazard analysis was performed on the subject property with the results and mitigation recommendations presented in the Preliminary Geotechnical Evaluation report by Leighton dated March 23, 2012. Recommendations therein include the avoidance and/or setback requirements from all onsite active faults. As presented in the said report, there is a Riverside County and California State Alquist Priolo Earthquake Fault Hazard Zone (also referred to as Seismic Hazard Zones) located within the subject property. Therefore, we concur that site planning must include setbacks from all active faults as determined by site specific fault investigations performed in accordance with City and State requirements and approved geotechnical/geologic report for this site.

**Response to Mr. McKibben, Ph.D.:**

Leighton concurs with Mr. McKibben that the project EIR should not rely on outdated and inaccurate hazard maps and all relevant published information as well as independent evaluations must be performed. Mr. McKibben requested the following geologic hazards to be evaluated and mitigated:

- **Hazard 1** - Seismic shaking and liquefaction/collapse potential in relation to uniform building codes.

**Response:** Leighton has performed geotechnical/geologic analyses and evaluations for the WLC property and the findings and mitigation recommendations for these phenomena are presented in the March 23, 2012 report. Leighton's seismic design parameters are in accordance with the current 2010 California Building Code (CBC) and should be followed by the project design team.

- **Hazard 2** - Seismic slumping and ground rupture potential caused by the proximity to the active San Andreas, Casa Loma, San Jacinto and Farm faults.

**Response:** Leighton has performed detailed subsurface evaluations and analyses on the potential for ground rupture and seismic slumping (landsliding) from the above mentioned faults. Mitigation recommendations for structural setbacks and active fault avoidance have been presented in the March 23, 2012 report. While some areas along the active San Jacinto fault zone have not been fully investigated, future studies are recommended in this area prior to completion of concept development plans in order to provide appropriate fault setback zones.

- **Hazard 3** - Landslides and slow-motion creep related to active faulting along the project's boundary.

**Response:** Leighton's detailed fault investigations, aerial photo reviews and boring explorations within and along the project's boundary have not encountered any evidence of ground creep or landslides related to active faulting. Leighton recommends additional slope stability analysis once concept grading plans are developed for slopes that could be subject to seismic shaking or slow-motion creep.

- **Hazard 4** - Rupture-induced explosions and fire potential for two major regional natural gas pipelines that cross active faults within or adjacent to the project etc.

**Response:** Leighton agrees with this assessment and the project design team should consider appropriate measures to limit potential damages caused by active fault movement to these gas transmission mains.

- **Hazard 4** - Any hazards identified by the State's existing emergency response plan for a major earthquake on the San Jacinto fault in the inland empire.

**Response:** Leighton agrees that the design team should consider the State's emergency response plan for major earthquakes in the area.

- **Hazard 4** - Flooding, inundation, and hydrocompaction resulting from the

increase in the area of Mystic Lake since 1938 and the projection of its areal extent to 2023 (Morton et al., 2006).

**Response:** *Leighton's review of the projected extent of Mystic Lake was considered in our 2012 Geotechnical evaluation. Based on the study by Morton, the predicted high water elevation will remain approximately 70 feet below the southern low edge of the WLC planned development. The affects due to hydrocompaction are also considered in our report and appropriate remedial earthwork recommendations are presented.*

Leighton recommends that the project EIR should be updated to include the discussion points included herein or as deemed appropriate.

If you have any questions regarding this letter, please contact this office. We appreciate this opportunity to be of service.

Respectfully submitted,

LEIGHTON AND ASSOCIATES, INC.

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CEG 1921 (Exp. 2/28/14)  
Senior Principal Geologist

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### References

- Budlong, Gerald M., 2012, letter Regarding Notice of Preparation for the Draft Environmental Impact Report for the World Logistics Center Specific Plan, dated March 22, 2012.
- Leighton and Associates, Inc., 2004, Preliminary Fault Investigation, Tentative Tract Map No. 32501, Moreno Highlands, City of Moreno Valley, California, Project No. 111061-103, dated December 3, 2004.
- Leighton and Associates, Inc., 2006, Preliminary Geotechnical Investigation, Moreno Highlands Specific Plan Area, Southeast Corner of Highway 60 and Redlands Boulevard, City of Moreno Valley, Riverside County, California, Project No. 111061-104, dated March 8, 2006.
- Leighton and Associates, Inc., 2007a, Supplemental Fault Investigation, Moreno Highlands Development, City of Moreno Valley, California, Project No. 111061-107, dated February 15, 2007.
- Leighton and Associates, Inc., 2012, Preliminary Geotechnical Evaluation for Environmental Impact Report, "World Logistics Center Specific Plan", South of SR 60 between Redlands Boulevard and Gilman Springs Road, City of Moreno Valley, California, Project No 111061-126 Dated March 23, 2012.
- Leighton and Associates Inc., 2012, Supplemental Fault Investigation, Lee Property, Portion of World Logistics Center Specific Plan Area, City of Moreno Valley, California, Project No. 111061-127, dated March 20, 2012.
- McKibben, Michael A., 2012, letter Regarding notice of Preparation of a Draft Environmental Impact Report – World Logistics Center Specific Plan, dated March 25, 2012
- Morton, D.M., 2006, Historic Lake Levels of Mystic Lake and a projection of where the lake level (closed depression) is predicted to be in 2023, [http://pubs.usgs.gov/of/2006/1217/of23006-1217\\_map/of2006-1217](http://pubs.usgs.gov/of/2006/1217/of23006-1217_map/of2006-1217), Fig 5.pdf.