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Re: DEIR for the proposed World Logistics Center, State Clearinghouse No. 2012021045

Please accept the following comments pertaining to the project referenced above on behalf of the Tri-County Conservation League (TCCL). TCCL is a public interest organization primarily concerned with the Santa Ana River and its watershed. The proposed project lies wholly within the Santa Ana River Watershed and, by virtue of its size and nature, has great potential for adversely affecting the river, its tributaries, and their associated natural communities both directly and indirectly. Please include these comments in the public records pertaining to CEQA review of the above referenced project.

The proposed World Logistics Center project (hereafter WLC Project) must be viewed in the context of pre-existing conditions, the overall needs and welfare of residents, and likely prospects that it would enhance the community. Although growth boosters abound (sometimes verging on irrational exuberance), real opportunities for the city to achieve fiscal security while enhancing, or at least not sacrificing its residential "Quality of Life" are limited. One must question whether the proposed benefits of the WLC project to the community are realistic and whether they would outweigh likely detriments.

### **The nature of the problem**

The City of Moreno Valley aspires to be a place "where dreams soar", yet its aspirations for economic growth and community vitality are ultimately constrained by physical and economic realities. Most of the urban landscape is devoted to residential use, which (partly due to Prop 13 tax constraints) lacks the tax base to support and improve urban services in the long-term. This is a persistent structural problem.

One might ascribe Moreno Valley's fiscal problems to poor urban planning, which has followed a path of growth divergent from traditional communities. While population centers traditionally arise around sources of economic opportunity, based on proximity and/or convenient access to basic industrial resources and transportation corridors, the City of Moreno Valley has reversed the process by first establishing itself as a bedroom community to distant job centers. Secondly, the City seeks to lure job-producing industries which might increase its tax base and employ its residents. This reverse sequence has been enabled by an automobile-dependent culture fueled by relatively cheap fuel, a factor now changing rapidly. When the City of Moreno Valley incorporated, the price of gasoline was about one quarter of the current price. Cheap fuel was an incentive for long-distance commuting, as was the

relatively cheap housing in Moreno Valley (compared to housing near coastal job centers). The population of Moreno Valley grew rapidly, accompanied by imbalance in the tax base and associated sociological problems, such as proliferation of latch-key kids, juvenile delinquency, drug use, street crime, etc.

The jobs/housing imbalance in Moreno Valley is destined to continue as long as the coastal communities continue to offer higher wage jobs and higher cost housing. For every Moreno Valley commuter who chooses to give up a long commute for a local job, another worker is likely to take his/her place in the commuter queue.

Because most of the land in Moreno Valley is devoted to residential homes and retail businesses, options for locating major new job-producing industries are largely constrained to the city's undeveloped eastern outskirts. Although this land was long devoted to agricultural and pastoral activities, it was more recently zoned for residential housing, but the WLC proposal would convert much of it to industrial warehouses, thereby foreclosing other opportunities for housing and/or other industrial uses. This area lies farthest from access to the only major north-south transportation corridor (I-215) serving Moreno Valley. The only major east-west corridor (SR-60), although nearer the proposed WLC project site, is already at or near capacity and traffic is regularly backed up where the SR-60 and I-215 merge near the west end of Moreno Valley. Considering that the WLC project is projected to add several thousand daily truck trips to local traffic corridors, getting into or out of Moreno Valley and nearby communities could get much worse – a commuter's nightmare. Even without the WLC project, the traffic burden on these traffic routes is projected to increase. Whether truck traffic to/from the eastern portion of Moreno Valley moves on SR-60 or on surface streets, it must ultimately contribute to traffic congestion on one or both routes and to worsen the bottlenecks at the SR-60/I-215 and SR-60/SR-91 (in Riverside) interchanges. Trucks emanating from the WLC site and traveling east on SR-60 have a steep grade to surmount and will surely impede other vehicular traffic using that route. All-in-all, it seems illogical to place a major warehouse project in the area now proposed.

The WLC Project (if built out as planned) would be a major consumer of transportation capacity on most, if not all, roads leading into and out of Moreno Valley. The added traffic would compete directly with existing commercial and private commuter traffic, thereby substantially reducing the rate of traffic flow for current and future residents of Moreno Valley, as well as neighboring communities. The slower traffic will likely add measurably more pollutants to the already impaired air quality than would the same volume of traffic were the traffic flow rate to remain as it is currently. It is bad enough that the major portion of added traffic associated with the proposed WLC Project would consist of diesel trucks, a major source of health-debilitating exhaust components, but the amount of pollution they produce is greatly increased as they alternately brake and accelerate in stop-and-go traffic.

The diminished "quality of life", due to increased air pollution, related health issues, and traffic congestion expected to accompany the WLC project, may never come to pass because the warehouse complex may never meet economic expectations. Such warehouses would have to compete with existing facilities in the Ontario – San Bernardino area, which are better situated with respect to access to rail and highway transportation corridors. These facilities currently are reported to have around a

20% vacancy rate, and competition for warehouse occupants will only become greater when the expanded Panama Canal is completed in the near future (2015 projected) and around 30% of the shipping volume currently off-loaded at West Coast ports is anticipated to sail on to East Coast ports. What then would be the use of over 40,000,000 sq-ft of under-utilized (maybe empty) warehouse space? If those facilities could not then be converted to viable economic uses, they will simply become a proverbial white elephant, although albatross might be a more appropriate metaphor.

If the WLC Project is approved, in spite of the numerous associated environmental impacts, it is hoped that effective mitigation measures will be incorporated to reduce or eliminate those impacts. Considering that regional air quality is already impaired, all feasible measures should be taken to ensure that air quality will not be further degraded as a result of the WLC project. Several measures could mitigate traffic-related impacts. For example: 1) mandate construction of additional road capacity (sufficient to accommodate all project-related vehicle traffic), perhaps in the form of new traffic lanes dedicated to trucks, be added to SR-60 and I-215, including the SR-60/215 and SR-60/91 interchanges; 2) mandate that diesel trucks use only low-sulfur fuel, as an interim measure, and be expeditiously replaced with zero-emission vehicles; 3) mandate that on-site warehouse vehicles be all-electric. To the extent that environmental impacts cannot be fully eliminated, the project should be required to purchase local carbon emission credits and/or adopt other measures to offset regional air quality impacts.

Other comments:

- 1) The WLC Project appears to claim over 1000 acres of public lands (owned in fee title by the State) at the northern limits of the San Jacinto Wildlife Area (SJWA) as a "conservation buffer". This is an egregious error, as the land in question belongs to the People of California and cannot be part of a private project. Nor can it be considered a "conservation buffer", as it is already conserved habitat, just the same as all other portions of the SJWA. Rather than serving as a buffer, this land is conserved habitat which needs to be buffered from incompatible adjoining land uses. And, to the extent that environmental values in the lands bordering the WLC project become degraded, appropriate mitigation(s) must be proposed. The concept of an open space buffer at the southern limits of the WLC Project is a good idea and would certainly help to reduce the impacts arising from proposed adjoining industrial uses; but such a buffer cannot be comprised of existing conserved habitat owned by the State of California. To claim the use of public lands as mitigation for an adjoining private project makes a farce of public acquisition of lands for parks, wildlife habitat, and other open space purposes; this would have state-wide repercussions and surely invite legal challenge.
- 2) The WLC Project needs to be redefined/designed to eliminate inclusion of public lands as any form of mitigation; the redefined project should include discussion of likely adverse impacts to the adjacent SJWA and specify appropriate mitigations. Additionally, the WLC project would displace much foraging habitat for raptors and other birds which inhabit and/or regularly overwinter in the Northern San Jacinto Valley. The EIR needs to identify these impacts and specify appropriate mitigation measures.

3) This project has serious socio-economic implications for the City of Moreno Valley and the entire region. It deserves detailed analysis of likely environmental degradation for the region in general and specifically for the adjacent SJWA. The ecological functions, habitat values, and constituent natural communities (including several sensitive plant and animal species) of the SJWA are major assets of Riverside County's Multi-Species Habitat Conservation Plan (MSHCP). Degradation of these assets could risk the loss of permits (under auspices of the MSHCP) which allow for "take" of federally protected species elsewhere in western Riverside County, including the WLC project site. Additionally, the EIR needs to present an independent (of project proponents) assessment of project-related economic, mobility, and health issues. In its current form the DEIR does not provide sufficient and accurate information for public consideration and assessment of all likely environmental impacts and proposed mitigations.

Sincerely,

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