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April 8, 2013

Mr. John Terrell
City of San Moreno
Community & Economic Development Department
14177 Frederick Street
Post Office Box 88005
Moreno Valley, CA 92553

Re: World Logistic Center - DEIR

Dear Mr. Terrell,

The California Outdoor Heritage Alliance (COHA) – an organization representing the interests of over 50 organizations and entities dedicated to the promotion of wildlife conservation – has serious concerns regarding the Draft Environmental Impact Report (DEIR) prepared to evaluate the environmental impacts associated with the proposed World Logistics Center Project ("project") in Rancho Belago in the eastern portion of the City of Moreno Valley.

California once boasted over 5 million acres of naturally occurring wetland habitats. Today – largely due to development, flood control and other projects – over 90% of these critical habitats have been destroyed, resulting in significant impacts on all wetland-dependent species. In fact, as a direct result of the substantial loss of this important habitat type, roughly 50% of our state's threatened and endangered species are, in some way, wetland-dependent. Due to the significant changes in California's natural hydrology, our remaining interior wetlands must now be artificially irrigated and intensely managed – at a significant cost to the landowner – to recreate seasonal wetland habitat for these special status species.

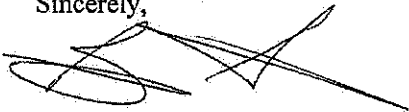
This proposed project covers 3,918 acres – including 3,814 acres of land which is the subject of various entitlements, and an additional 104 acres of land affected by off-site improvements needed to support the proposed development. Any development of this substantial size would have serious environmental impacts. However, in this case, the proposed project area is located in one of the most environmentally important and sensitive wetland habitat complexes remaining in California. The project's environmental impacts to our already severely impacted wetland base and wetland-dependent species would be significant and unacceptable without substantial appropriate mitigation measures. Specifically, in the case of this gigantic project, as just one example, the DEIR woefully understates the project's impacts on waterbirds and other species on the Department of Fish and Wildlife's (DFW) San Jacinto Wildlife Area (SJWA) and adjacent privately owned and managed wetland habitats. It follows that the mitigation measures proposed, including requiring a minimum 250-foot setback from environmentally sensitive areas, are substantially inadequate and unacceptable.

Making matters worse, the DEIR incorrectly designates an area adjacent to the SJWA and part of the World Logistic Center project as a "conservation buffer". However, the area described within this

"conservation buffer" is owned and maintained by DFW as part of their SJWA. This area was acquired by the Wildlife Conservation Board over a decade ago for addition to the SJWA for endangered and threatened species habitat and associated wildlife conservation efforts in the county of Riverside. Designating this area as a "conservation buffer" and mitigation in the DEIR is not only incorrect, it is inappropriate and misleading.

On behalf of the general public of California, and the natural resources of our state that they hold in public trust, DFW, the Wildlife Conservation Board and others have invested over \$100 million in the SJWA and surrounding unique habitats that would be unacceptably impacted by this project. As a result of the location, substantial size, inadequate analyses of wildlife impacts and the overly insufficient mitigation offered within the DEIR, our organization has no choice but to take serious issue with the document and strongly urge it be wholly rejected by the City of Moreno

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Gaines", with a long horizontal stroke extending to the right.

Bill Gaines, President