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Moreno Valley Unified School District

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Our mission is to prepare all students academically and socially to become productive members of society

April 5, 2013

Mark Gross, AICP
Senior Planner
Community and Economic Development Department
City of Moreno Valley
14177 Frederick Street
Moreno Valley, CA 92553

Subject: Comments on Draft Environmental Impact Report for World Logistics Center Project

Dear Mr. Gross:

The Moreno Valley Unified School District (District) welcomes this opportunity to comment on the Draft Environmental Impact Report for the World Logistics Center project. While the District has not taken the position of opposing the project, we have serious concerns about the project's impacts on the environment, particularly the impacts on air quality, and the health and safety of our students, and staff. As outlined in this letter, the DEIR is seriously flawed and should be revised and recirculated before any action is concerning the approval of this project.

PROJECT SUMMARY

The WLC project covers 3,918 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,814 acres of land which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development.

The proposed entitlements include general plan amendments, adoption of a specific plan, zone change, tentative parcel map, pre-annexation and development agreement. The WLC Specific Plan proposes a master-planned logistics campus to include up to 41.4 million square feet of high-cube logistics warehousing, up to 200,000 square feet of light logistics uses, a site for logistics support uses (LS designation), and 75 acres of Open Space in the southwest corner of the site. The Specific Plan includes extensive development standards, design guidelines, and review procedures for all development within the project.

GENERAL COMMENTS

The WLC DEIR does not provide adequate analysis of impacts to District schools or children attending schools. The District operates a total of 39 schools; 23 elementary, six middle, four high schools, four alternative education schools, one early childhood center, and one adult education school. Three schools are located within two miles just west of the WLC site: Ridge Crest Elementary School, La Jolla Elementary School, and Landmark Middle School. The District operates a number of schools along Alessandro, Cottonwood, and Eucalyptus just south of the SR-60.

Some land uses are considered more sensitive to air pollution, greenhouse gas emissions, health risks, noise and traffic impacts, than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases. Schools are considered sensitive receptors.

The DEIR only analyzes sensitive receptors immediately adjacent to the WLC site. Due to the project size and the substantial increase in truck traffic, impacts must be analyzed for schools and other sensitive receptors within a larger context. For example, the project's contribution health risk along the SR-60 should also be evaluated with respect to risk to children attending schools in this area. Additionally, truck trips using Alessandro to access the freeway should be clearly depicted and associated cancer risk should be evaluate for schools along Alessandro and all other truck routes.

SPECIFIC COMMENTS

Specific Comments are provided below categorized by issue area.

Project Description

The WLC would result over 70,000 truck trips per day, which would have a substantial impact on the surrounding community in several environmental categories. The project description needs to include a figure and description of the preferred and allowable truck routes from the WLC site to the SR-60 and I-215 Freeways.

The project description states the Moreno Beach Substation will be expanded to 112 MW, and a new 60 MW substation will be constructed to serve the project (DEIR page 3-51). The description refers to Figure 3.16, which only shows one substation. The Moreno Beach Substation expansion should be clearly depicted on Figure 3.7 and described under energy. The location of this facility and surrounding uses are necessary to determining whether the off-site expansion will result in any health effects.

Air Quality and Community Risk and Hazards Comments

District schools nearest to the project site and along truck routes should be included in the air quality analysis and locations should be shown on Figure 4.3.7.

While the trip generation rate assumed in the Air Quality modeling is higher than the 1.44 trips per thousand square feet (TSF) identified in the 8th Generation of the Institute of Transportation Engineer's (ITE) Trip Generation Manual, it is still substantially lower than the reasonable worst-case trip rate recommended by SCAQMD of 2.59 trips/TSF. The following is stated in the California Emissions Estimator Model User's Guide (CalEEMod):

"..The trip rate value used in URBEMIS is 4.96 trips per 1,000 square feet (TSF) for warehouse projects (land use type 150). This value is from the 7th Edition of the Trip Generation manual, published in 2003. Several developers of high-cube warehouses in recent years have questioned the validity of this value for modern warehousing operations and have commissioned local studies to investigate these trip rates. As a result, in the most recent version of the Trip Generation manual (8th Edition, 2008), additional data has been included to provide a new high-cube warehouse (land use 152) trip rate of 1.44 trips/TSF. SCAQMD staff and other interested parties have questioned lead agencies about this lower rate because of concern that industrial warehouse project analyses may be underestimating the number of trucks serving them. If this were true, air quality impacts may be underreported in the corresponding CEQA analyses... In order

to avoid underestimating the number of trips associated with large warehouse / distribution center operations without rail service, AQMD staff recommends that lead agencies utilize a rate of 2.59 trips per TSF for large warehouse air quality analyses on a project specific basis. The value of 2.59 from the nationwide dataset is preferable instead of the SCAB rate of 3.68 due to the greater reliability of data based on the larger sample size. For warehouses with rail service, a rate of 1.63 trips per TSF may be used. These values provide reasonable worst case default rates for individual new warehouses in the absence of more project-specific data.”

The Table below illustrates how a change in the trip generation assumption would significantly increase trips generated by the project, and correspondingly underreport the project’s air quality and health risk impacts.

High Cube Warehouse Trip Generation Comparison

	Trips Rate	Trips from 41,400 TSF of Logistics
High Cube Warehouse Trip Rate Identified in the Draft EIR	1.68	69,552
High Cube Warehouse Trip Rate Identified in CalEEMod User’s Guide	2.59	107,226
		37,674 trips

Table 17 of the DEIR, Daily Trips and Fleet Mix, indicates that there would be 71,085 daily trips associated with the project. Using the trip generation rates in Table 16, Trip Generation Rates, and the operational build-out schedule in Table 15, there would be 73,845 trips per day associated with the project. Therefore, trip generation is underreported, which results in underreporting the project’s air quality and health risk impacts.

Trip Generation Comparison

Land Use	TSF	Trips Rate in Table 16	Trips
Logistics (High Cube Warehouse)	41,400	1.68	69,552
Light Logistics	200	3.56	712
Gas Station with Pumps	12	113.95	1,367
Convenience Store	3	737.99	2,214
	41,615 TSF	NA	73,845
Difference from 71,085 Daily Trips in Table 17			-2,760 trips

Additional mitigation that should be considered. There are currently several research and demonstration programs being conducted by the Port of Los Angeles, SCAQMD, California Energy Commission, Environmental

Protection Agency and the U.S. Department of Energy, to develop dedicated zero-emission trucks or hybrid electric trucks that will have zero-emission range. Such demonstrations are expected to be completed within the next several years and lay the foundation for commercialized products. According to SCAQMD, the first generation of zero-emission trucks will be available within the next five years. Build-out would occur well beyond 2022 due to the market demand for warehousing (even though emissions present a worst-case assumption that the project would be built out in 10 years). These trucks will be available within the build-out timeframe considered and should be considered to mitigate the project's significant unavoidable air quality impacts.

Health Impacts from Diesel and Ultra-fine Particulate Matter Emissions, Especially on Children, Are Not Fully Addressed. Diesel particulate matter (DPM) is responsible for most of the *cancer* risk in California from toxic air contaminants; as well as most of the cancer risk from the WLC Project. Significant *non-cancer* health effects also are known to result from diesel particulate emissions. Among the specific non-cancer health effects known to result from diesel particulate matter are:

- Aggravated Asthma
- Decreased lung function in children
- Respiratory and cardiovascular hospitalizations
- Premature death from non-cancer effects such as respiratory and heart diseases (which may occur at a greater frequency than death from cancer)

Adverse non-cancer health effects from DPM, such as those listed above, are not fully evaluated by the methods used in the DEIR.

The Health Risk Assessment (HRA) methodology used in the DEIR underestimates adverse *chronic* non-cancer health impacts known to result from exposure to diesel particulate matter. Health impacts are underestimated due to limitations in the methodology. The Reference Exposure Level (REL) for diesel PM used in the DEIR to calculate a chronic non-cancer Health Hazard Index (HHI) does not account for all of the known health effects from DPM exposure, especially in children. We recognize, and hasten to point out, this methodological deficiency is not unique to the World Logistics Center DEIR; it is present in similar DEIRs due to the fact that alternative quantification methods are lacking. However, it is critical that these limitations of the HRA methodology be clearly and prominently emphasized in the report. The Project DEIR fails in this regard.

The DEIR also downplays the known *acute* non-cancer risk from exposure to project emissions. The report asserts that there is insufficient exposure information to establish a short-term non-cancer health risk guidance value for respiratory effects (DEIR, p. 4.3-71). As a result, the DEIR incorrectly concludes "Therefore, the potential for short-term acute exposure from diesel exhaust are considered to be less than significant and no mitigation is required." Based on the known short-term health effects of DPM, as summarized above and below, this statement in the DEIR is erroneous and grossly misleading.

The DEIR does not account for the greater sensitivity of children to non-cancer health effects caused by diesel and ultra-fine particulate matter (UFP). Scientific studies have shown associations between traffic-related pollution and effects in children, including chronic bronchitis, allergic rhinitis, asthma induction, upper and lower respiratory tract infections, and impaired lung function growth (CARB, *Emission Reduction Plan for Ports and Goods Movement*, 2006).

In a 2001 report (Prioritization of Toxic Air Contaminants Under the Children's Environmental Health Protection Act) the Office of Environmental Health hazard Assessment (OEHHA) identified diesel exhaust particulate matter as one of the five "Tier 1" toxic air contaminants (out of a total of 200 candidate TACs evaluated) that may cause infants and children to be especially susceptible to illness. The 2001 OEHHA report describes diesel exhaust particulate as " ... ubiquitous in urban environments, and exposures are widespread. There are many studies demonstrating that diesel exhaust particulate can enhance allergic responses, and induce new allergies to airborne allergens. This raises concern for enhancement of allergic airway disease including asthma, and for development of new asthma. Diesel exhaust particles contribute to ambient PM₁₀. Ambient PM₁₀ has been shown to exacerbate asthma and has been associated with low birth weight and decreased lung function in children. Several studies provide evidence of adverse respiratory health impacts in children living near streets with heavy truck traffic. In addition, diesel exhaust particulate contains PAHs (and other mutagenic polycyclic organic matter).

The DEIR also fails to adequately disclose and analyze UFP emissions from the project and, as a result, there is insufficient information and analysis regarding the adverse health impacts to District students and staff caused by UFPs. In the decade before and the year since the DEIR was released, the scientific research pointing to the adverse health effects from UFPs, especially on children, has continued to grow¹². The project will route more than 71,000 average daily vehicle trips, including over 14,000 truck trips per day, in close proximity to District schools. Each of these new pollution sources will emit significant quantities of UFPs in the vicinity of District schools, students, and staff. The DEIR does not account for the wider dispersion zone of UFPs compared with larger particles (PM_{2.5} and PM₁₀). UFPs are 0.1 micron or less in size and will travel farther from the Project than larger particulates. According to one study of the I-10 freeway in Los Angeles, UFPs travel up to 8,500 feet downwind and 1,970 feet upwind from the emission site³.

Because of their smaller size, UFPs also are able to penetrate more rapidly and deeper into the lung and more readily translocate to other organs in the body than larger particles (PM_{2.5} and PM₁₀). By failing to account for the wider impact and significant health hazards of UFPs (both downwind and upwind), the DEIR improperly masks some of the most significant impacts of the Project. However, despite the troubling lack of data regarding UFPs in the DEIR, there is no doubt UFPs from the project pose a significant health threat to MWUSD students. This threat must be fully disclosed and evaluated in order to provide sufficient data for informed decision-making.

The District requests that the DEIR be revised to include additional efforts to adequately characterize—and mitigate—the un-quantified non-cancer health risks of diesel (DPM) and ultra-fine (UFP) particulate matter emissions from the project on school-age children.

¹ SCAQMD.2012. 2012 AQMD Draft Program EIR, September 2012.

² University of Southern California. 2011. Final Report: Fine-Scale Spatial and Temporal Variability of Particle Number Concentrations Within Communities and in the Vicinity of Freeway Soundwalls. Prepared for CARB and CalEPA. April 26, 2011.

³ Hu, S.S., et al., A wide area of air pollutant impact downwind of a freeway during pre-sunrise hours. Atmospheric Environment, 2009, 43, (16): p. 2541 – 2549.

The Greater Sensitivity of Children to Toxic Air Contaminants and Cancer Risk is Not Evaluated. The DEIR shows significant and unavoidable cancer risks will result from the project, including for students and staff at District schools (see Figures 1 and 2, attached). However, due to the risk assessment methodology used, the presentation in the DEIR underestimates the cancer risk to children. The cancer risk factor for DPM used in the DEIR fails to adequately account for the greater sensitivity of children to Toxic Air Contaminants (TACs). Scientific research data from humans and animals suggest that exposure to a variety of carcinogens early in life may result in a greater lifetime risk of cancer than exposures later in life. Because of this, the State of California (OEHHA, 2012) now recommends that cancer risk factors be weighted by a factor of three for exposure of children ages two to sixteen (Air Toxics Hot Spots Program Risk Assessment Guidelines, Technical Support Document for Exposure Assessment and Stochastic Analysis; OEHHA, August 2012). Furthermore, the OEHHA has recommended the use of age-specific cancer risk factors since at least 2009. (OEHHA, Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures, May 2009.)

OEHHA guidelines also recommend that exposures from projects lasting more than six months be evaluated for the duration of the project. Given that District elementary schools, middle schools, and high schools are within the significant cancer risk contours of the project (see Figures 1 and 2, attached), the DEIR should be revised to include age specific risk factors and an appropriate exposure period in order to fully assess the risks to students.

The District requests that the DEIR include an analysis of health risks to schools – including cancer risks to students -- using appropriate exposure durations, and agency-recommended age-specific risk factors.

Health Risks from Diesel PM Remain Un-Quantified. Although the DEIR quantifies the cancer and non-cancer risks of diesel exhaust PM, additional health effects from diesel PM are not quantified in the DEIR's methodology. The list of health effects for diesel PM not captured in the DEIR is long (see CARB, 2006), and is rapidly evolving, with new scientific findings being published regularly.

The District requests the DEIR be revised to include additional efforts to adequately characterize—and mitigate—cancer and non-cancer health risks associated with diesel PM from the Project.

Additional Mitigation Required. The foregoing comments describe some of the DEIR's deficiencies in evaluating the project air quality impacts and associated health risks, including underestimating cancer risks and non-cancer hazards to students from particulate matter and other pollutants. Despite these deficiencies, the DEIR does identify significant and unavoidable cancer risk impacts to District school sites (see Figures 1 and 2, attached) from the "mitigated project". Where there is a significant unavoidable adverse impact, CEQA requires incorporation of all feasible mitigation to avoid or substantially less that effect (see CEQA Guidelines §15091). Additional mitigation beyond that proposed in the DEIR is necessary – and available --for these significant impacts.

The mitigation measures included in the DEIR fail to reduce project impacts to an acceptable level, and do not adequately protect the sensitive receptors at school sites that will be impacted by this project. As such, in addition to correcting the specific deficiencies in the DEIR noted above, we suggest that additional mitigation projects be developed that would balance community needs with goods movement to and through the project. The District

requests consultation with the City and project applicant so that the required additional mitigation measures can be developed and included as part of the project in an efficient and effective manner.

As a starting point for these future discussions, we point to the Mitigation Grant Programs that the ports of Long Beach and Los Angeles have funded and successfully implemented to address residual air quality impacts to schools and other receptors. The goods movement projects that prompted port area Mitigation Grant Programs are comparable in scope (e.g., thousands of trucks) and impacts (DPM emissions) to the World Logistics Center Project. To date, the port of Long Beach (POLB) alone has committed over \$17 million for goods movement mitigation grant programs. For example, the POLB has funded installation of high efficiency air filters in local schools in the amount of more than \$3 million; additional POLB funding for school air filtration projects is pending. The efficacy of high efficiency air filtration installations in schools as mitigation for residual air impacts from goods movement has been demonstrated by the SCAQMD⁴.

Mitigation grants associated with the WLC project could be used for a range of measures that have been proven successful in the ports and other areas. These measures include: 1) the installation of high performance air filtration units, 2) installation of new energy efficient windows and doors with low air leakage, and 3) landscaping with air filtration benefits. A working concept being considered on one port project with similar air quality impacts would dedicate at least 10 percent of the total project costs associated with the development of the project to the Mitigation Grant Program. Another approach would be to provide annual funding to the Mitigation Grant Program based on a percentage of gross revenues of project operations until such time that modeled emissions no longer impact sensitive receptors.

Greenhouse Gas Emissions

The project's operational GHG emissions would generate 751,787 mt CO₂e/year and 665,321 mt CO₂e/year with design features. The GHG section does not provide an analysis how this level of GHG emissions will impact the surrounding area or region.

This section must evaluate consistency of the project with the strategies proposed by the Southern California Association of Governments (SCAG) to reduce vehicle miles traveled (VMT) in the region, in accordance with Senate Bill 375 (SB 375). SCAG's 2012 SCS/RTC uses substantially different assumptions for population and employment for the site per the adopted Moreno Highlands Specific Plan. Therefore, consistency of the project must be analyzed with respect to the 2012 RTC/SCS.

CEQA requires incorporation of all feasible mitigation to avoid or substantially lessen significant unavoidable impacts (see CEQA Guidelines §15091). The project includes one mitigation measure related to reducing solid waste to mitigate GHG emissions. Project design features that mitigate GHG emissions should be outlined in the mitigation program to ensure enforceability.

Hazards and Hazardous Materials

The DEIR states that there are no existing school facilities within one-quarter of a mile of the project area. Due to the project size and the substantial increase in truck traffic, impacts must be analyzed for schools and other

⁴ SCAQMD, 2009. Pilot Study of High Performance Air Filtration for Classrooms Applications, draft report, prepared by South Coast Air Quality Management District and IQAir North America, Inc., October 2009.

sensitive receptors within a larger context. Truck routes should be examined to ensure that truck-related risks will not impact schools along dedicated truck routes.

The DEIR must identify the threshold for businesses required to prepare a Hazardous Materials Business Emergency Plan.

High pressure natural gas lines cross the project site that will be relocated or protected in place. A pipeline risk assessment should be prepared to determine the risk of a catastrophic accident and its impact to the surrounding residents and nearest District schools.

Population, Housing and Related School Impacts

The DEIR states that the project would not generate an increase in residential units or an increase in population. Further it states that no homes and no significant generation of school-aged children would be developed as part of the proposed project. However, the project would generate approximately 24,642 new permanent employees in addition to 7,583 indirect /induced permanent jobs and 13,128 short-term construction-related jobs.

The approximately 25,000 new jobs would nearly double the existing employment of 25,120 in the city. Doubling the number of jobs in the city would induce population growth in the area. The DEIR must quantify the increase in population resulting from new jobs in the area, the number of students that would be generated, and its impact on District schools.

The DEIR states that employees of the project who choose to live in the City would likely utilize the existing supply of housing. However, there is no analysis to support that statement. Employment and housing factors should be taken into account to substantiate the analysis, such as the existing housing inventory and surplus and the location of the where the anticipated workforce currently resides based on education and income.

Traffic and Circulation, Noise

The traffic study does not provide a description or illustration of truck routes going to and from the project site. The DEIR states that 82 percent for the truck trips will be oriented west via one or more freeways. The DEIR needs to state specifically which surface streets will be used. If east-west surface streets, such as Alessandro Boulevard, will be used to access the I-215 or SR-60, then the DEIR must analyze the impacts resulting from the substantial increase in truck traffic along these routes. The analysis must include, but is not limited to: the increase in traffic noise levels for schools and outdoor playgrounds, the potential traffic safety impact of truck trips along streets adjacent and near schools, and as stated above, DPM health risks.

CONCLUSION

The District strongly urges the City to revise and correct these deficiencies and recirculate the DEIR before considering approval of the project. The District will continue to actively participate in this process and looks forward to working with the City to ensure each of these concerns is sufficiently addressed prior to approval of the project.

Thank you for considering our comments. Should you have any questions, please contact me at (851) 571-7500 or Sergio San Martin, Director II, Facilities at (951) 571-7692.

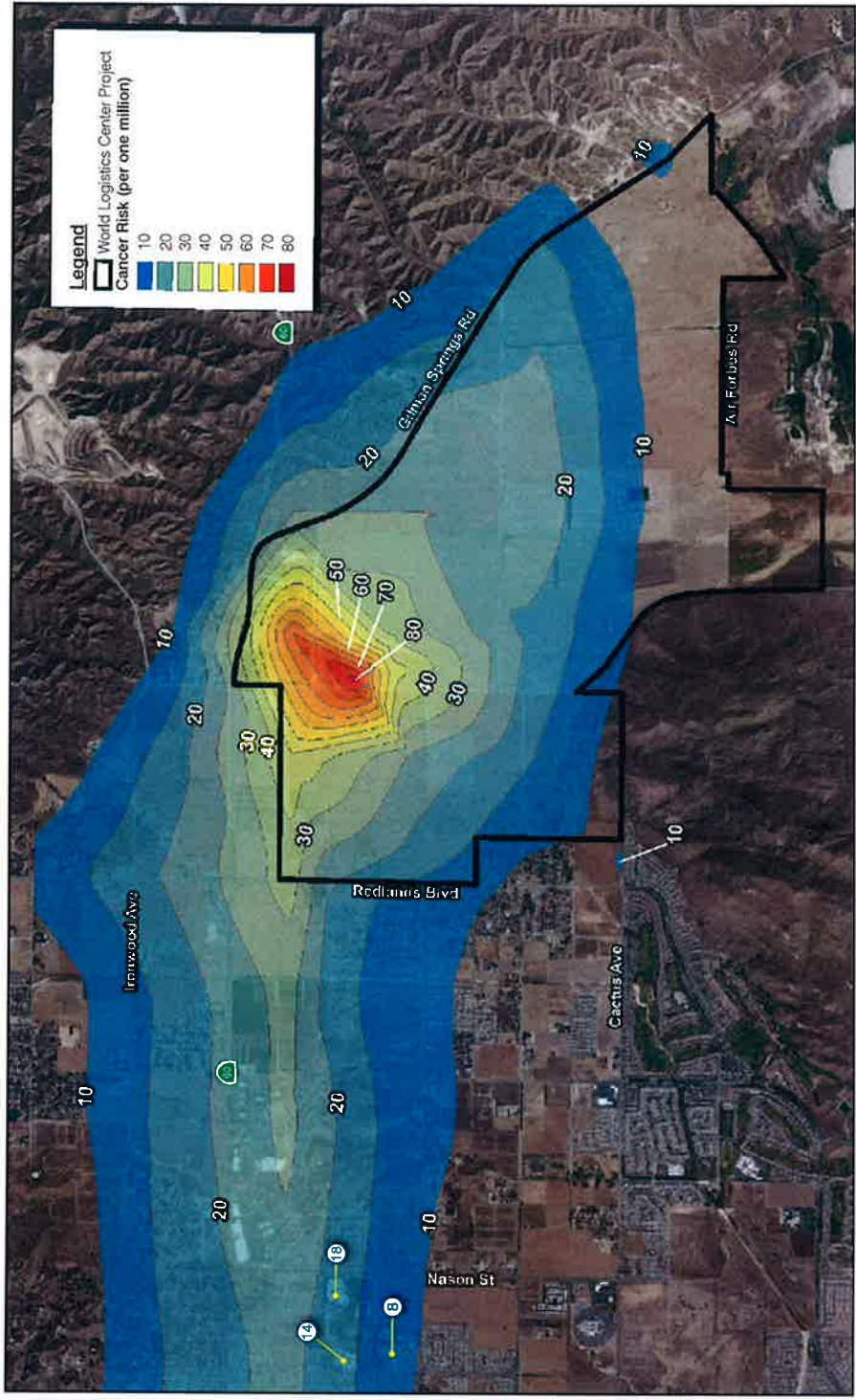
Mr. Mark Gross
April 5, 2013
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Sincerely,

A handwritten signature in black ink that reads "Judy D. White". The signature is written in a cursive style with a large initial "J".

MORENO VALLEY UNIFIED SCHOOL DISTRICT
Dr. Judy D. White, Superintendent

Schools and Mitigated Project Incremental Cancer Risk Near Project



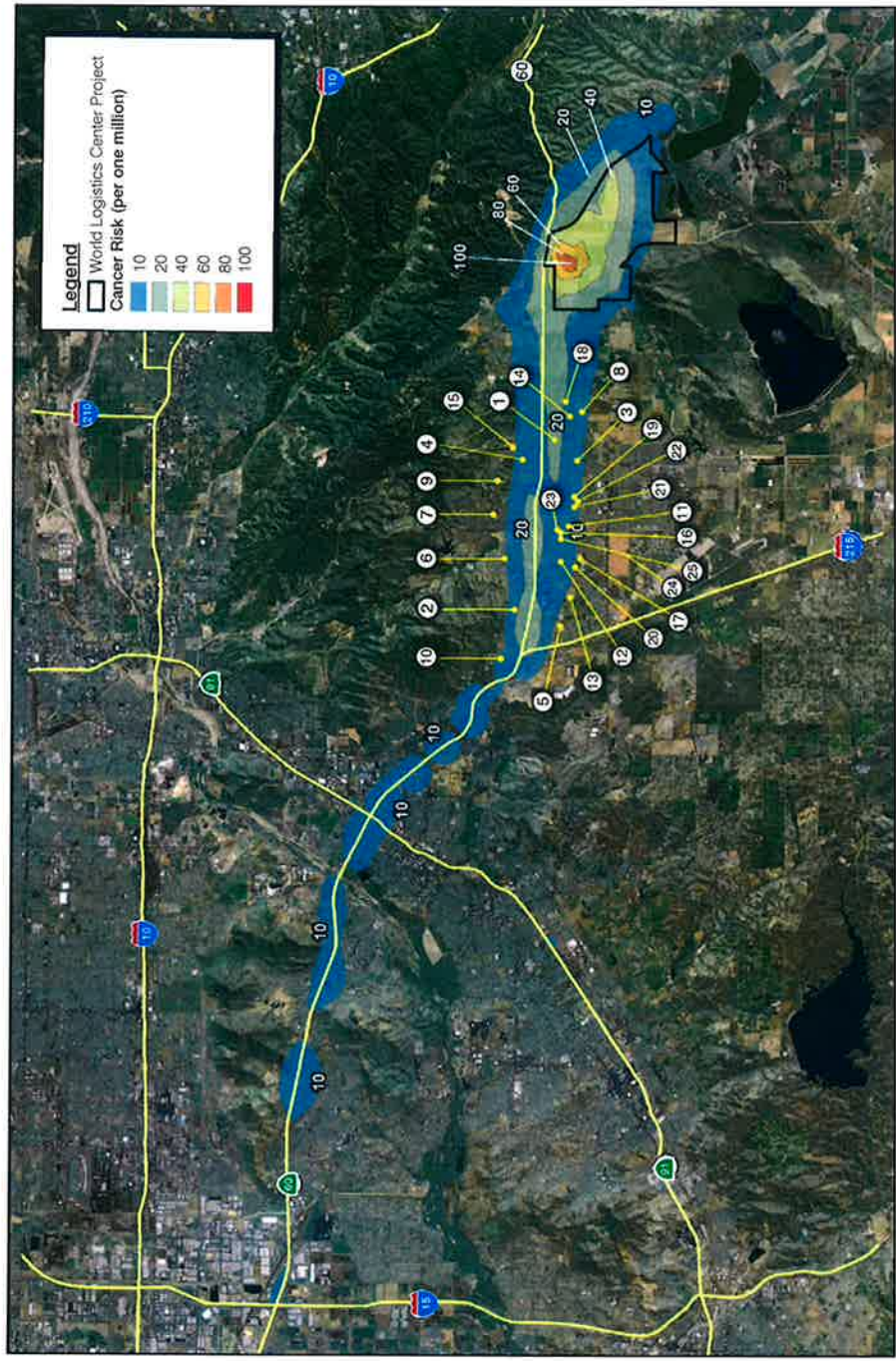
- 8 Moreno (1-5)
26700 Cottonwood Ave
- 14 Mountain View (6-8)
13130 Morrison Ave
- 1B Valley View (9-12)
13135 Nelson Ave



Source: LSA 2013, DEIR, Figure 4.3.13
 Moreno Valley USD, Comments on Draft EIR, World Logistics Center Project



Schools and Project Incremental Cancer Risk



- 1 Bear Valley (1-5) 25201 J.F. Kennedy Dr
- 2 Box Springs (1-5) 11900 Athens Dr
- 3 Butterfield (1-5) 13400 Kitching Dr
- 4 Cloverdale (1-5) 12050 Kitching Dr
- 5 Edgemont (1-5) 21790 Eucalyptus Ave
- 6 Honey Hollow (1-5) 11765 Honey Hollow St
- 7 Midland (1-5) 11440 Davis St
- 8 Moreno (1-5) 26700 Cottonwood Ave
- 9 North Ridge (1-5) 25101 Kalmia Ave
- 10 Seneca (1-5) 11615 Wordsworth Rd
- 11 Sunnymead (1-5) 24050 Dracaea Ave
- 12 Sunnymeads (1-5) 23200 Eucalyptus Ave
- 13 TownGate (1-5) 22480 Dracaea Ave
- 14 Mountain View (6-8) 13130 Morrison Ave
- 15 Palm (6-8) 11900 Slawson Ave
- 16 Sunnymead (6-8) 23996 Eucalyptus Ave
- 17 Moreno Valley (9-12) 23300 Cottwood Ave
- 18 Valley View (9-12) 13135 Nelson Ave
- 19 Adult Ed 13350 Indian St
- 20 Alessandro School (SDC K-12) 23311 Dracaea Ave
- 21 March Mountain (10-12) 24551 Dracaea Ave
- 22 March Valley Core (9-12) 24551 Dracaea Ave
- 23 March Valley (1-8) 23996 Eucalyptus Ave
- 24 Rainbow Springs - Head Start 23990 Eucalyptus Ave
- 25 Rainbow Springs - Pre-school 23990 Eucalyptus Ave



The Planning Center | DCE&E • Figure 1

Source: LSA 2013, DEIR, Figure 4.3.11
 Moreno Valley USD, Comments on Draft EIR, World Logistics Center Project

