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John Terell
City of Moreno Valley
P.O. box 88005
Moreno Valley, CA 92552
Attn: John C. Terell, Planning Official

Re: Draft Environmental Impact Report / World Logistics Center Project

Dear Mr. Terell:

San Diego Gas and Electric (SDG&E) and the Southern California Gas Company (SCGC) have reviewed the Draft Environmental Impact Report for the World Logistics Center (WLC) Project and would like to submit the following comments. SDG&E and SCGC own a total of 194 acres of land immediately south of the Specific Plan site. SDG&E operates a natural gas compressor plant, known as the Moreno Compressor Station, on 19 acres in the south-central portion of the site. The SCGC operates a metering and valve station on two separate parcels (totalling 1.5 acres) in the south-central portion of the site south of Alessandro Boulevard along existing Virginia Street. The World Logistics site contains a variety of overhead and underground utility lines associated with oil, natural gas, and electrical service.

SPECIFIC COMMENTS

1. The DEIR concludes that noise impacts from pipeline blow-down events on planned land uses within WLC site would need to be mitigated through a combination of setbacks and sound attenuation devices installed at SCGC's facility. SDG&E and SCGC request that language be added to the EIR stating that the developer shall be responsible for mitigating any impacts associated with locating development within 500 feet of the blow down events that would occur at SDG&E and SCGC facilities.

In addition, SDG&E and SCGC requests that the following language be added to mitigation measure 4.12.6.4A to clarify responsibility for installation of any sound attenuation facilities:

Mitigation Measures. Operation of the proposed WLC project could result in exposure of people to noise levels as high as 130 dBA or greater during SCGC blow-down events. The following measure would reduce long-term utility related noise impacts associated with the proposed WLC project:

4.12.6.4A Prior to the issuance of building permits for projects within 500 feet of the SCGC and SDG&E facilities, documentation shall be submitted to the City confirming that sound attenuation devices or improvements for the blow-down facilities providing at least a 40 dB reduction in noise levels during blow-down events area available and will be installed for all planned blow-down events. It shall be the responsibility of the developer to fund any sound attenuation improvements to the blow-down

facilities required by this measure. It shall also be the responsibility of the developer to coordinate with SDG&E and/or SCGC regarding the installation of any sound attenuation devices or improvements on the blow-down facilities at either the SDG&E compressor station or the SCGC pipelines. This measure shall be implemented to the satisfaction of the City Planning Official.

2. As discussed in Section 3.4.6.3 of the DEIR, relocation of natural gas transmission lines within the proposed WLC project into public street rights - of-way and easements will be necessary to support site development and grading of the WLC project. SDG&E and SCGC request that language be added to the DEIR stating that any relocations of utilities necessary to implement the World Logistics project will be the responsibility of the developer. SCGC will work with the project proponent to relocate the pipeline(s) to a mutually agreeable location at the project proponent's expense.
3. As discussed in Chapter 3 of the DEIR, a general plan amendment and zone change covering 3,814 acres, which will designate 1,084 acres of land for Open Space (CDFW and SDG&E properties), 20 acres for Public Facilities (SDG&E and SCGC properties), and 2,710 acres for the WLC Specific Plan is proposed as a part of the WLC Project. SDG&E and SCGC requests that language be added to the DEIR including assurances that SDG&E and SCGC property designated as open space in accordance with the proposed general plan amendment and zone change would not be considered permanently set aside for habitat preservation. SDG&E and SCGC need to retain the ability to implement projects on SDG&E and SCGC property.

Should you have any questions, please do not hesitate to call me.

Sincerely,



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cc: Lea Petersen
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