



DEPARTMENT OF PARKS AND RECREATION

Major General Anthony L. Jackson, USMC (Ret), Director

Inland Empire District  
17801 Lake Perris Drive  
Perris, CA 92571  
(951) 443-2423

April 8, 2013

Mark Gross  
City of Moreno Valley  
Community Development Department  
14177 Frederick Street  
Moreno Valley, CA 92552

Subject: Comments on the World Logistics Center Draft Environmental Impact Report  
SCH #: 2012021045

Dear Mr. Gross:

The Inland Empire District of the Department of Parks and Recreation (State Parks) appreciates the opportunity to comment on the aforementioned project. State Parks is a trustee agency as defined by the California Environmental Quality Act (CEQA). State Parks' mission is to provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. As the office responsible for the stewardship of Lake Perris State Recreation Area (Lake Perris), we have an interest and concern about contemplated alterations of land use adjacent to the park.

In general, State Parks requests revisions to the proposal and design of the project due to the potential for a substantial number of significant impacts related to ecosystem health, sensitive biological resources and wildlife movement. Furthermore, it appears that the amount of the proposed development is directly proportional to the levels of impact (i.e., the larger the development area, the higher amount of significant impacts).

For these reasons, we suggest looking at alternatives which reduce the development area, thereby potentially reducing the amount of impact. The following are comments regarding the scope and content of information for inclusion in the draft environmental impact report.

The DEIR addresses impacts to the California Department of Fish and Wildlife owned and operated, San Jacinto Wildlife Area (SJWA) on numerous occasions but rarely addresses impacts to Lake Perris, while just as with the SJWA, the project shares a boundary with Lake Perris. In many cases it may be appropriate to consider impacts to both units as one large conserved unit; however, the DEIR needs to address direct,

indirect and cumulative impacts to Lake Perris in all areas of the document independently as well.

As a signatory to the Western Riverside County Multi-species Habitat Conservation Plan (MSHCP) State Parks is privy to MSHCP biological monitoring program plant and animal survey results and reports. As such State Parks is aware of numerous observations of state and federal listed species as well as MSHCP covered species made by the MSHCP biological monitoring program within or immediately adjacent to the project area which have not been identified or addressed in the DEIR. These omissions need to be addressed in the Final EIR and avoidance and mitigation measures developed for all state, federal and MSHCP plan covered species. State Parks recommends that the project proponents contact the MSHCP monitoring program for the results of its surveys within and adjacent to the project area.

The DEIR comments on impacts to raptor foraging habitat in section 4.4 on several occasions under the regulatory framework of California Fish and Game Code and California Code of Regulations but fails to address impacts to golden eagle, *Aquila chrysaetos*, foraging under California Fish and Game code or federal Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c). The DEIR needs to address impacts to golden eagle foraging habitat from this project.

The DEIR references the MSHCP Fuel Management Guidelines and agrees to incorporate all brush management within the development boundaries. The DEIR does not provide a description of what type of fuel management activities are planned for the development, where the fuel management area will be, the size of the fuel management area, or what type of vegetation will be planted, if any, within the fuel management area. The DEIR should provide a fuel management plan, including a plant palette and proposed maintenance activities, graphics that clearly define these fuel modification zones with reference to the development, and an assessment of any potential impacts related to the fuel management area and associated maintenance activities. Analysis of impacts related to fuel modification areas should not be deferred to future development.

The DEIR addresses migratory corridors/ linkages in the following manor (p. 4.4-33):

*“The project area is adjacent to an existing migratory corridor across Gilman Springs Road (i.e. Criteria Cells 1290, 1389, and 1390) as designated by the MSHCP. While the open agricultural fields that presently occupy much of the project area are not designated as corridors or linkages in the MSHCP, the project site, including the CDFW property, supports extensive agricultural fields, which do not constitute native vegetation, but do provide some foraging value and may allow for migration or movement of wildlife through the general area even considering the level of repeated disturbance by agricultural activities. Wildlife movement through this area is generally planned to take place across the Mystic Lake property to the south. The northern (upland) portion of the SJWA (i.e., the CDFW Conservation Buffer Area) and the southern portion of the Specific Plan area do not provide suitable habitat or resources to support wildlife migration or regular wildlife movement.”*

And (p 4.4-62):

*“According to the project biological report, the project area does not contain any wildlife movement corridors or linkages. It is likely that wildlife moves through adjacent properties such as the SJWA and the Mystic Lake area to the south, the Badlands area to the east and the Lake Perris State Recreation Area to the southwest. The project biological report concluded that development of the project as proposed would not have any significant impact on wildlife movement in the area, and would not fragment habitat or adversely affect wildlife movement through the surrounding areas. Therefore, impacts in this regard are less than significant, and no mitigation is needed.”*

State Parks believes that the DEIR and the project biological report do not adequately address project impacts to migratory corridors/ linkages as they apply to Lake Perris. We suggest that wildlife movement studies be conducted to further analyze potential impacts to wildlife corridors/ linkages to the Lake Perris/SJWA area from the project. Lake Perris is occupied by a host of common, sensitive and state and federal listed species which will be left largely isolated by this project. In order to maintain genetic integrity they require varied linkages to larger adjacent open spaces. State Parks suggests that studies consider lesser linkages in addition to those identified in the MSHCP, specifically the areas identified as “On-site Drainages” that traverse the project area, without such lesser linkages Lake Perris will be left as a relatively isolated peninsula of preserved open space leading to the loss of biodiversity and over all habitat value.

The referenced project biological report only concentrated on certain onsite species with only anecdotal observations of other wildlife. Specific comprehensive wildlife movement studies are needed to properly analyze potential impacts of such a large scale project as this.

Loss of species will lead to recreational impacts as well as much of the visitation to Lake Perris is for wildlife viewing and visiting a wild place. Even when the public does not see a mountain lion, golden eagle or any other species or personal interest during their visit the knowledge that they might or that that species could be hiding around the corner is an important recreational draw.

The Project will create certain barriers to wildlife movement, including the physical barrier between the Badlands and open space areas to the south of the Project, a significant increase in traffic surrounding the Project area, and increased levels of light and noise. The build out of the proposed Project will create an obstruction to wildlife movement to and from the Badlands across the nearly 2-mile Project boundary along Gilman Springs Road. This barrier forces wildlife to move east, potentially causing a funneling effect across Gilman Springs Road at the edge of the development. This forced detour effectively limits the ability for wildlife to utilize the existing culverts under State Route 60 to further access the Badlands open space.

The DEIR also largely overlooks impacts to the Badlands, and its significant acreages of public and private open space as well. Further evaluation of impacts to this important

open space and the linkage to it needs to be made and avoidance and mitigation measures established.

Mitigation measures focusing on reducing impacts to wildlife movement in the area should be provided. In considering mitigation measures for wildlife movement further analysis of impacts to wildlife moving across roads and roadkill need to be made and avoidance and mitigation measures developed for reducing injury or death of wildlife crossing roads.

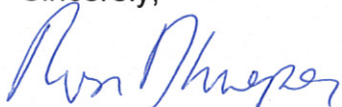
The Specific Plan provides for a 400-foot setback along the southern boundary of the Project, adjacent to Lake Perris and SJWA, which includes a 250-foot development setback and a 150-foot building setback. The 250-foot development setback would include landscape areas, drainage and water quality facilities, barriers (walls and fencing), maintenance access drives, and other related uses as described in the DEIR. This area should not be considered a buffer from development but rather an aspect of the development as they will contain maintained facilities required by the development. State Parks recommends a minimum 250 feet natural/undeveloped buffer that would not contain any manufactured structures, such as detention and water quality basins, walls and fences, and irrigated landscaping.

The DEIR states that night lighting may have adverse effects on a range of wildlife species. Effects include mortality due to increased predation, reduced health due to the disturbance of diurnal rhythms, and reduced clutch size, egg size, or survival of nesting birds. Although the Project intends to remain consistent with both the night lighting guidelines within the City's Municipal Codes and the City's Dark Sky Lighting Ordinance, additional measures should be proposed to reduce the cumulative impacts to Lake Perris and SJWA.

The DEIR also states that approximately 75 acres in the southwest corner of the project area is designated and restricted to passive open space and recreation use adjacent to Mount Russell and Lake Perris. The DEIR does not identify how this area will be managed as a passive open recreational open space. Or whether a conservation easement designating it as such will be placed on the property?

Thank you again for coordinating this project with us. For further discussion, please contact me or Enrique Arroyo at (951) 453-6848.

Sincerely,



Ron Krueper  
District Superintendent  
Inland Empire District

cc: State Clearinghouse  
Jay Chamberlin, State Parks  
Kim Freeburn, California Department of Fish & Wildlife