



09/18/2023

VIA EMAIL ONLY

Juan Galvan, Contract Planner
City of Moreno Valley
Community Development Department
14177 Frederick Street
P.O. Box 88005
Moreno Valley, CA 92552
Email: juang@moval.org

RE: NOP Comments for the Moreno Valley Business Park Building 5 Project

Dear Mr. Galvan,

The comments are submitted on behalf of Californians Allied for a Responsible Economy ("CARE CA") regarding the Notice of Preparation ("NOP") of a Draft Environmental Impact Report ("DEIR") for the Moreno Valley Business Park Building 5 Project ("the Project"). CARE CA understands that the proposed Project consists of the construction of 212,313 square feet of light industrial uses within an approximately 9.98-acre site.

The goal of an EIR is to provide decisionmakers and the public with detailed information about the effects of a proposed project on the environment, how significant impacts will be minimized and alternatives to the project (Pub. Res. Code § 21002.2). We, therefore, respectfully request a complete analysis of all identified impacts, imposition of all feasible mitigation and study of a reasonable range of alternatives.

I. General Comments

i) Air Quality & Public Health: Given the expected 24 hours a day, 7 days a week operation, the Project would undoubtedly contribute to air pollution. The City must make all efforts to minimize air quality effects to the greatest extent possible. Therefore, the Air Quality analysis should be based on actual emissions data from existing similar sized warehouse projects rather than computer generated estimates. In addition, a Health Risk Assessment (HRA) must be prepared as part of the DEIR that accurately reflects any and all proposed future industrial/warehouse uses, and also accounts for other emission sources such as backup

generators, and forklifts. Furthermore, estimates of the significance of air quality impacts must be consistent with current epidemiological studies regarding the effects of pollution and various kinds of environmental stress on public health. Failure to take these measures will result in a DEIR that is deficient in its informational discussion of air quality impacts as they connect to adverse human health effects.

ii) Greenhouse Gas Emissions (GHG): The DEIR can use robust thresholds such as Earthjustice group's net zero emission model for the Project's GHG emissions analysis. Using such a model will enable the City to require effective measures that reduce GHGs or even achieve net zero emissions. In addition, the DEIR must include a detailed discussion on the Applicant's plan to offset the Project's GHG emissions. Any measures to address climate change threats must be considered. After all, it should be all about the letter and spirit of the law!

iii) Cumulative Impacts: People living nearby would face environmental impacts from the cumulative effects of the Project and other surrounding commercial and industrial developments in the area. The EIR must analyze and mitigate this cumulative impact.

iv) Mitigation measures: Mitigation measures must be effective and enforceable. Every effort must be made to incorporate modern technology in the mitigation measures and MMRP. For example, a requirement that all off-road equipment and trucks using the site during construction be zero emission, near-zero emissions or alternative-fueled vehicle would both reduce and/or eliminate air pollution impacts and CO2 emissions.

v) Full Disclosure: Provide all sources and referenced materials when the DEIR is made available.

II. Conclusion

Thank you for the opportunity to submit NOP comments. Again, CARE CA respectfully requests under CEQA full analysis of the environmental impacts, feasible mitigation, and reasonable alternatives to the Project.

We look forward to reviewing and commenting on the DEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski", with a long horizontal flourish extending to the right.

Jeff Modrzejewski
Executive Director