A detailed site plan of Moreno Valley Business Park Building 5. The building is a large, rectangular, light-brown structure with a grid of internal divisions. It is surrounded by a grey asphalt parking lot with numerous white parking spaces. To the left of the building is a landscaped area with green grass, trees, and a blue curb. To the right is a loading dock area with several white trucks parked. The plan includes various details like trees, shrubs, and a blue line representing a boundary or path.

## Moreno Valley Business Park Building 5

## Final Environmental Impact Report

Prepared for  
City of Moreno Valley

June 4, 2025

# **FINAL ENVIRONMENTAL IMPACT REPORT**

for the

## **Moreno Valley Business Park Building 5**

### **Prepared for:**

City of Moreno Valley  
14177 Frederick Street  
Moreno Valley, CA 92552  
Contact Person: Danielle Harper-Scott

### **Prepared by:**

Applied Planning, Inc.  
11762 De Palma Road, 1-C 310  
Corona, CA 92883

June 4, 2025



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## 1.0 INTRODUCTION

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# **1.0 INTRODUCTION**

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## **1.1 OVERVIEW**

This document, combined with the Draft Environmental Impact Report (DEIR), constitutes the Final EIR for the Moreno Valley Building No. 5 Project (Project). The DEIR describes existing environmental conditions relevant to the proposal, evaluates the Project's potential environmental effects, and identifies mitigation measures to reduce or avoid the potentially significant impacts. The DEIR was circulated for a 45-day review period: January 16 through March 3, 2025.

## **1.2 CONTENT AND FORMAT**

Subsequent to this introductory Section 1.0, Section 2.0 of this Final EIR presents revisions and errata corrections to the DEIR text. Responses to comments received on the DEIR are presented in Final EIR Section 3.0. The EIR Mitigation Monitoring Program is presented in Final EIR Section 4.0.

## **1.3 DRAFT EIR COMMENTERS**

### **1.3.1 Overview**

The complete list of Draft EIR commenters, along with copies of comment letters and responses to comments, is presented in Section 3.0 of this Final EIR. The following list identifies the comment letters received in regard to the Draft EIR:

- Governor's Office of Planning and Research, State Clearinghouse
- CA Department of Transportation, District 8
- South Coast Air Quality Management District (2 letters)
- Riverside County Airport Land Use Commission
- Riverside Transit Agency

- Sierra Club
- Sierra Club Attorney - Abigail Smith
- Blum, Collins & Ho LLP

### **1.3.2 Presentation of Comments and Responses**

All comment letters received in regard to the Draft EIR are included, along with corresponding responses, in their entirety in Final EIR Section 3.0, *Comments and Responses*.

## **1.4 LEAD AGENCY AND POINT OF CONTACT**

The Lead Agency for the Project and EIR is the City of Ontario. Any questions or comments regarding the preparation of this document, its assumptions, or its conclusions, should be referred to:

City of Moreno Valley  
Community Development Department  
14177 Frederick Street  
Moreno Valley, CA 92552  
Contact Person: Danielle Harper-Scott, Senior Planner

## **1.5 PROJECT SUMMARY**

The following information is summarized from the Project Description in the Draft EIR. For additional detail in regard to Project characteristics and Project-related improvements, along with analyses of the Project's potential environmental impacts, please refer to Draft EIR Sections 3.0 and 4.0, respectively.

### **1.5.1 Project Location**

Specific Plan No. 205 is located north of SR-60 (E – W) at Heacock Street (N – S) in the northwest portion of the City of Moreno Valley, in western Riverside County. The Project considered herein comprises approximately 9.98 acres within Specific Plan No. 205, located immediately southeast of Ironwood Avenue (E – W) at Heacock Street (N – S).

### 1.5.2 Project Overview

On or about February 2, 2021, the City Council approved the Moreno Valley Business Park (“District Project”) located on 9.98 acres of mostly vacant land at the southeast corner of Heacock Street and Ironwood Avenue in the City of Moreno Valley (“Original Project Site”). The District Project included a single industrial building of approximately 220,390 square feet.

The land use entitlements approved for the District Project included the following: a) Resolution No. 2021-07 certifying a Mitigated Negative Declaration (“MND”) and Mitigation Monitoring Plan for the District Project pursuant to CEQA; b) Resolution No. 2021-08 approving a General Plan Amendment (PEN20-0139) changing the land use designation of the Project Site from “Commercial” to “Business Park”; c) Ordinance No. 978 approving Specific Plan Amendment 205 (PEN20-0138) to change the land use designation of the District Project Site from “Retail Commercial” to “SP205 Mixed Use”; d) Resolution No. 2021-11 approving Plot Plan (PEN20-0137) for a 220,390-square-foot light industrial building; and e) a Zone Change to change the District Project Site’s zoning designation from “Regional Commercial” to “Mix of Uses.” The Sierra Club filed a lawsuit challenging the City’s approval of the Mitigated Negative Declaration for the District Project, along with the foregoing land use approvals.

On or about October 14, 2024, the Court issued a Peremptory Writ of Mandate (“Writ”), as stipulated by the parties, in which the Court ordered the City to set aside and vacate the following approvals for the District Project: a) Resolution 2021-07 adopting a Mitigated Negative Declaration and Mitigation Monitoring Plan; b) Resolution No. 2021-08 approving General Plan Amendment PEN20-0139; c) Resolution No. 2021-11 approving Plot Plan PEN20-0137; and d) Ordinance No. 978 adopting Specific Plan Amendment PEN20-0138. The Writ further ordered the City to proceed in a manner consistent with the Writ and CEQA in connection with any “reconsideration” or “re-approval” of the District Project. The City was granted up to one-hundred eighty (180) days to file and serve a return to the Writ (“Return”) and, if necessary, to file and serve any subsequent Returns every 90 days thereafter. The purpose of the Return is to memorialize with the Court the actions taken by the City to comply with the terms and conditions of the Writ.



The Applicant, LGC 10MV, LLC, has submitted entitlement applications to develop the proposed Moreno Valley Building No. 5 Project (Project). The Project is subject to review under this Draft Environmental Impact Report (“DEIR”) pursuant to CEQA and the *CEQA Guidelines*, and as applicable, consistent with the terms and conditions of the Writ.

### **1.5.3 Project Objectives**

The primary goal of the Project is to transition available underutilized vacant property to productive high quality light industrial uses. Complementary Project Objectives include the following:

- Implement the City Plan (General Plan), as amended herein, through development that is consistent with the General Plan Land Use Element and applicable General Plan Goals, Objectives, Policies and Programs;
- Implement Specific Plan No. 205, as amended herein, through development of new light industrial uses that are consistent with the amended Specific Plan land uses and development concepts, and in total supports the Specific Plan Vision;
- Provide roadway and wet and dry utility infrastructure adequate to serve the Project;
- Implement light industrial uses that are compatible with adjacent land uses;
- Implement light industrial uses in a manner that is cognizant of natural and man-made conditions and that minimizes potential adverse environmental effects;
- Implement light industrial uses that are responsive to current and anticipated market demands;
- Implement light industrial development that would increase locally available construction employment opportunities;

- Implement light industrial development that would increase locally available long-term employment opportunities;
- Attract new light industrial uses businesses and jobs and thereby foster economic growth.

#### **1.5.4 Discretionary Actions**

##### **1.5.4.1 Lead Agency Discretionary Actions and Permits**

*CEQA Guidelines* Section 15124 states in pertinent part that if “a public agency must make more than one decision on a project, all its decisions subject to CEQA should be listed...” Requested decisions, or discretionary actions, necessary to realize the Project would include:

- Certification of the Project EIR;
- Approval of a General Plan Amendment (Land Use Element), redesignating the Project site General Plan Land Use from Commercial to Business Park/Light Industrial;
- Adoption of Specific Plan No. 205, Amendment No. 2; and related amendment(s) to City Zoning Map(s);
- Approval of a Lot Line Adjustment or Parcel Map to combine and reconfigure existing parcels comprising the Project site;
- Site Plan/Plot Plan Approval(s);
- Approval of Infrastructure Improvement Plans including, but not limited to, roads, sewer, water, storm water management system, and dry utilities plans.

#### **1.5.4.2 Other Agency Consultation and Permits**

Anticipated consultation(s) and permits from agencies necessary to realize the Project would likely include, but are not limited to, the following:

- Tribal Resources consultation with requesting Tribes as provided for under *AB 52, Gatto. Native Americans: California Environmental Quality Act*; and *SB 18, Burton. Traditional tribal cultural places*;
- Permitting may be required by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit;
- Permitting may be required by/through the South Coast Air Quality Management District (SCAQMD) for certain equipment or land uses that may be implemented within the Project area; and
- Various construction, grading, and encroachment permits allowing implementation of the Project facilities.

## **2.0 REVISIONS AND ERRATA CORRECTIONS**

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## **2.0 REVISIONS AND ERRATA CORRECTIONS**

### **2.1 INTRODUCTION**

Based on the comments received on the Draft EIR (which are provided in full in Section 3.0 of this Final EIR), this Section presents revisions to the text of the Draft EIR. For text corrections, additional text is identified by **bold underlined text**, while deletions are indicated by ~~strikeout~~ font. All text revisions affecting mitigation measures have been incorporated into the Mitigation Monitoring Plan presented in Section 4.0 of this Final EIR. Text changes are presented under the chapter or topical section of the Draft EIR where they are located. The revisions and corrections provided here expand and clarify analyses previously provided, and do not constitute substantive new information. Conclusions of the Draft EIR are not affected by these revisions.

### **2.2 REVISIONS**

In response to SCAQMD comments on the DEIR, Project air quality modeling has been updated employing the latest available version of CalEEMod. Updated Air Quality Impact Analysis (AQIA) and Greenhouse Gas Assessment (GHGA) modeling is provided at FEIR Attachment 2, *Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment* (Urban Crossroads, Inc.) May 13, 2025. The updated emissions modeling reflects the current Project Opening Year (2027). Additionally, based on updated information provided by the Applicant, construction emissions estimates have been revised to assume 15,000 cubic yards of soil import. All other modeling assumptions are consistent with assumptions employed in the previous (January 17, 2022) AQIA and GHGA Modeling. All modeling was conducted consistent with SCAQMD and CalEEMod protocols. Emissions modeling summaries are presented below. Correlating DEIR Tables and discussions are amended accordingly by reference.

**Table 1**  
**Maximum Daily Construction-Source Emissions - Regional Impacts**

Year	Emissions (lbs./day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	*PM <sub>10</sub> T	*PM <sub>2.5</sub> T
<b>Summer</b>						
2026	3.91	34.71	32.27	0.07	7.67	4.37
2027	30.65	23.23	35.75	0.05	2.96	1.42
<b>Winter</b>						
2026	2.06	16.24	21.08	0.03	2.30	1.11
2027	1.93	15.15	20.57	0.03	2.20	1.02
Maximum Daily Emissions	30.65	34.71	35.75	0.07	7.67	4.37
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

**\*Notes:** PM<sub>10</sub>T, PM<sub>2.5</sub>T = PM Total Suspended Particulates.

**Table 2**  
**Maximum Daily Operational-Source Emissions - Regional Impacts**

Emissions Source	Emissions (lbs./day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub> T	PM <sub>2.5</sub> T
<b>Summer</b>						
Mobile	1.63	13.39	17.89	0.16	7.80	2.20
Area	6.88	0.08	9.59	0.00	0.02	0.01
Energy	0.08	1.41	1.18	0.01	0.11	0.11
TRUs	0.07	0.77	0.92	0.00	0.01	0.01
Cargo Handling Equipment	0.12	0.38	16.44	0.00	0.03	0.03
Maximum Daily Emissions	8.78	16.02	46.02	0.17	7.97	2.36
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
<b>Winter</b>						
Mobile	1.57	14.02	15.45	0.15	7.80	2.20
Area	5.31	0.00	0.00	0.00	0.00	0.00
Energy	0.08	1.41	1.18	0.01	0.11	0.11
TRUs	0.07	0.77	0.92	0.00	0.01	0.01
Cargo Handling Equipment	0.12	0.38	16.44	0.00	0.03	0.03
Maximum Daily Emissions	7.14	16.57	33.99	0.16	7.95	2.34
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

**\*Notes:** PM<sub>10</sub>T, PM<sub>2.5</sub>T = PM Total Suspended Particulates.



**Table 3**  
**Maximum Daily Construction-Source Emissions - Localized Impacts**

Construction Phase	Year	Emissions (lbs./day)			
		NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Site Preparation	2026	34.61	31.01	7.43	4.31
	Maximum Daily Emissions	34.61	31.01	7.43	4.31
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Grading	2026	19.06	19.09	3.30	1.89
	Maximum Daily Emissions	19.06	19.09	3.30	1.89
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Building Construction	2026	14.76	15.71	0.80	0.74
	2027	13.75	15.61	0.70	0.64
	Maximum Daily Emissions	14.76	15.71	0.80	0.74
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Paving	2026	6.94	9.95	0.30	0.27
	Maximum Daily Emissions	6.94	9.95	0.30	0.27
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Architectural Coating	2026	1.11	1.50	0.03	0.02
	Maximum Daily Emissions	1.11	1.50	0.03	0.02
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

**Table 4**  
**Maximum Daily Operational-Source Emissions - Localized Impacts**

Scenario	Emissions (lbs./day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Summer	2.57	28.15	0.54	0.26
Winter	2.52	18.45	0.53	0.24
Maximum Daily Emissions	2.57	28.15	0.54	0.26
SCAQMD Localized Threshold	270	1,577	5	2
Threshold Exceeded?	NO	NO	NO	NO

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

**Table 5**  
**Total Project GHG Emissions**

Source	Emissions (MT/yr)				
	CO <sub>2</sub> T	CH <sub>4</sub>	N <sub>2</sub> O	R	Total CO <sub>2</sub> e
Annual construction emissions amortized over 30 years	21.64	6.64E-04	1.07E-03	1.19E-02	21.98
Mobile	2011.14	0.04	0.25	2.51	2090.02
Area	4.47	0.00	0.00	0.00	4.49
Energy	558.38	0.05	0.00	0.00	560.78
Water	70.65	1.66	0.04	0.00	124.15
Waste	19.37	1.94	0.00	0.00	67.77
Refrigerants	0.00	0.00	0.00	6.09	6.09
TRUs	0.00	0.00	0.00	0.00	19.24
Cargo Handling Equipment	0.00	0.00	0.00	0.00	47.37
Total CO <sub>2</sub> e (All Sources)	2,941.90 MTCO <sub>2</sub> e/yr				
SCAQMD Screening Threshold	10,000 MTCO <sub>2</sub> e/yr				

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

As indicated, employing the latest version of CalEEMod, Project emissions would remain below applicable SCAQMD thresholds. Consistent with previous DEIR discussions, all Project air quality impacts would be less-than-significant.

### **3.0 COMMENTS AND RESPONSES**

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## 3.0 COMMENTS AND RESPONSES

---

### 3.1 INTRODUCTION

The following Section presents written comments received pursuant to public review of the DEIR and provides responses to those comments as required by California Code of Regulations, title 14 (hereinafter, “*CEQA Guidelines*”) Sections 15089, 15132, and 15088. Specifically, *CEQA Guidelines* Section 15088, subd. (a) requires that: “[t]he lead agency . . . evaluate comments on environmental issues received from persons who reviewed the draft EIR and . . . prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.” The DEIR was circulated for a 45-day review period: January 16 through March 3, 2025.

In summary, the City’s written responses describe the disposition of significant environmental issues raised and any revisions to the Draft EIR made as a result of the comments. Additionally, the City’s written responses provide a good faith, reasoned analysis of all environmental issues raised and cite to specific factual and legal support for the Draft EIR’s conclusions.

#### 3.1.1 Comments Received

The following Section presents a list of the comment letters received during the Draft EIR public review period. Comment letters have been generally organized by state agencies; county, city, and local agencies; utilities; and local organizations and individuals. Each letter has been assigned an identifying designation (generally an acronym or name abbreviation), and topical items within each letter have been numbered. Table 3-1 lists all DEIR commenters and the designation assigned to each. Commenter correspondence

and correlating responses are presented subsequently. Comments have been reproduced verbatim and without grammatical or typographical correction.

**Table 3-1  
DEIR Commenters**

<b>Commenter</b>	<b>Acronym Assigned</b>	<b>Correspondence Date(s)</b>
<b>State Agencies</b>		
State Clearinghouse	SCH	--
CA Department of Transportation, District 8	DOT	2/20/25
<b>Regional &amp; County Agencies</b>		
South Coast Air Quality Management District (2 Letters)	AQMD	1/22/25, 3/3/25
Riverside County Airport Land Use Commission	ALUC	2/6/25
Riverside Transit Agency	RTA	2/6/25
<b>Private Organizations/Individuals</b>		
Sierra Club	SC	3/3/25
Sierra Club Attorney, Abigail Smith	SCA	3/3/25
Blum, Collins & Ho LLP	BCH	2/27/25

# Moreno Valley Business Park Building 5

## Summary

**SCH Number**

2023080366

**Lead Agency**

City of Moreno Valley

**Document Title**

Moreno Valley Business Park Building 5

**Document Type**

EIR - Draft EIR

**Received**

1/16/2025

**Present Land Use**

Present Use: Vacant, Zoning: Specific Plan 205, Commercial/Retail GP = Specific Plan 205, Commercial/Retail

**Document Description**

The Project proposes approximately 220,390 square feet of light industrial uses within an approximately 9.98-acre site within Specific Plan No. 205, located generally at the southeast corner of Ironwood Avenue at Heacock Street.

Pursuant to the requirements of the California Environmental Quality Act (CEQA), this DEIR evaluates and discloses the potential environmental effects resulting from the construction and operation of the proposed Project, located generally at the southeast corner of Ironwood Avenue and Heacock Street ("Project Site"). The Project, consists of the following: a) a General Plan Amendment (Land Use Element) redesignating the Project Site's General Plan Land Use Designation from "Commercial" to "Business Park/Light Industrial"; b) a Specific Plan Amendment amending the Moreno Valley Festival Specific Plan (Specific Plan No. 205), as amended by Amendment No. 1, to accommodate the development of Business Park/Light Industrial uses on the Project Site; c) related amendments to the City's Zoning Atlas to be consistent with changes made to the Project Site's land use designations as set forth in the 2006 General Plan and Specific Plan No 205; d) a Lot Line Adjustment or Parcel Map to combine and reconfigure the existing parcels within the Project Site to accommodate the proposed use of the Project Site; e) a Site Plan/Plot Plan addressing design and layout of the proposed uses of the Project Site; and f) Infrastructure Improvement Plans including, but not limited to, roads, sewer, water, storm water management system, and dry utilities plans.

The Moreno Valley Festival Specific Plan (Specific Plan No. 205) was adopted by the City of Moreno Valley circa 1987 (the "Original Specific Plan"). The Original Specific Plan encompassed approximately 73.74 acres located at the southeast corner of Ironwood Avenue (E – W) and Heacock Street (N – S).

The Original Specific Plan was first amended in 2018, which is known as "Specific Plan No. 205, Amendment No. 1" or "1st Amendment." The 1st Amendment provided a wider range of land uses and development



types than permitted in the Original Specific Plan, which was a response to the then current development trends. The 1st Amendment revised the land uses and development standards affecting approximately 64 acres within the Original Specific Plan area. The 1st Amendment specifically excluded properties located at the southeast corner of Ironwood Avenue at Heacock Street, which otherwise remain in Specific Plan No. 205. The expanded range of allowable uses approved under the 1st Amendment included commercial/retail development, retail uses, and open space designations. The 1st Amendment also facilitated the extension of Davis Street north to connect with the segment of Davis Street that extends north of Ironwood Avenue.

The Project will amend the Specific Plan No. 205's "Land Use Plan" for those properties (consisting of approximately 9.98 acres) that were excluded under the 1st Amendment. (See Figure 1.2-1, Project Location.) The Project will redesignate the 9.98 acres from "Retail Commercial" to "Mix of Uses," to accommodate the development of Building 5, which will consist of up to 220,390 square feet of light industrial uses.

To maintain consistency between the changes to the Specific Plan No. 205's Land Use Plan, the Land Use Designations of the applicable 2006 General Plan will be amended to redesignate the Project Site's General Plan Land Use Designation from "Commercial" to "Business Park/Light Industrial." This is the Land Use Designation needed to accommodate manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities.

As discussed in the City General Plan, "The zoning regulations shall identify the particular uses permitted on each parcel of land. Development intensity should not exceed a Floor Area Ratio [FAR] of 1.00 and the average floor area ratio should be significantly less . . ." (City of Moreno Valley General Plan, p. 2-14). The Project will include approximately 220,390 square feet of light industrial uses within an approximately 9.98-acre (434,730 square feet) Project Site – yielding an FAR of approximately 0.51. The Project's light industrial uses are consistent with uses allowed under the Business Park/Light Industrial General Plan Land Use designation. The Project's FAR (0.51) is consistent with and would not exceed the General Plan FAR (1.0) established for the Business Park/Light Industrial General Plan Land Use designation. The Project uses would be implemented consistent with zoning established under Specific Plan No. 205, as amended herein.

This Section identifies Project background issues, provides an overview of the Project and its Objectives, and summarizes the potential environmental impacts of the Project. Table 1.14-1, Impacts and Mitigation Summary, presented at the conclusion of this Section, lists these impacts and presents the mitigation measures recommended to eliminate or reduce the effects of those impacts which have been determined to be potentially significant. For a full description of the Project, its impacts, recommended mitigation measures, and considered Alternatives, please see EIR Sections 3.0, 4.0, and 5.0, respectively.

---

## Contact Information

### **Name**

Danielle Harper-Scott

### **Agency Name**

City of Moreno Valley

### **Job Title**

Project Planner

### **Contact Types**

Lead/Public Agency

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Ryan Martin

**Agency Name**

LCG 10MV LLC

**Job Title**

Applicant

**Contact Types**

Project Applicant

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(303) 419-6780

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rmartin@ledocg.com

**Name**

Ross S Geller

**Agency Name**

Applied Planning, Inc.

**Job Title**

Planning Consultant

**Contact Types**

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Corona , CA 92883

**Phone**

(909) 937-0333

**Email**

rgeller@appliedplanning.com

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## Location

**Coordinates**

33°56'44.2"N 117°14'32.9"W

**Cities**

Moreno Valley

**Counties**

Riverside

**Regions**

Southern California

**Cross Streets**

Ironwood Avenue and Heacock Street

**Zip**

92552

**Total Acres**

9.98

**Jobs**

214

**Parcel #**

481-020-013,-029,-030,-034,-035,-038

**State Highways**

SR-60

**Railways**

N/A

**Airports**

N/A

**Schools**

Moreno Valley Unified

**Waterways**

N/A

**Township**

3S

**Range**

3W

**Section**

6

**Base**

SBM

---

## Notice of Completion

### State Review Period Start

1/16/2025

### State Review Period End

3/3/2025

### State Reviewing Agencies

California Air Resources Board (ARB), California Department of Fish and Wildlife, Inland Deserts Region 6 (CDFW), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Parks and Recreation, California Department of Toxic Substances Control (DTSC), California Department of Transportation, District 8 (DOT), California Department of Transportation, Division of Aeronautics (DOT), California Department of Transportation, Division of Transportation Planning (DOT), California Department of Water Resources (DWR), California Energy Commission, California Fish and Game Commission (CDFGC), California Highway Patrol (CHP), California Native American Heritage Commission (NAHC), California Natural Resources Agency, California Public Utilities Commission (CPUC), California Regional Water Quality Control Board, Santa Ana Region 8 (RWQCB), California State Coastal Conservancy (SCC), Colorado River Board, Office of Historic Preservation, State Water Resources Control Board, Division of Drinking Water, State Water Resources Control Board, Division of Drinking Water, District 20, State Water Resources Control Board, Division of Water Rights, State Water Resources Control Board, Division of Financial Assistance, University of California Natural Reserve System (UCNRS)

### Development Types

Industrial (Business Park/Light Industrial)(Sq. Ft. 220390, Acres 9.98, Employees 214)

### Local Actions

General Plan Amendment, Specific Plan, Site Plan

### Project Issues

Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Geology/Soils, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Population/Housing, Public Services, Sewer Capacity, Solid Waste, Transportation

### Public Review Period Start

1/16/2025

### Public Review Period End

3/3/2025

## Attachments

### Draft Environmental Document [Draft IS, NOI\_NOA\_Public notices, OPR Summary Form, Appx,]

_Appendix A_MoVal BP Building 5_Initial Study_7	PDF	47103 K	Appendix A_ALUC	PDF	161 K
Appendix A_CARE	PDF	229 K	Appendix A_CEQA_NOP	PDF	80 K
			Appendix A_DOJ	PDF	128 K
Appendix A_DOJ attachment	PDF	326 K	Appendix A_EMWD	PDF	250 K
			Appendix A_NAHC	PDF	412 K
Appendix A_Project - NOP	PDF	2029 K	Appendix A_RCFC - Comment Letter	PDF	326 K
Appendix A_RCFC - Comment Letter pt2	PDF	366 K	Appendix A_RCFC - Previous Comment Letter	PDF	5709 K
Appendix A_SCAQMD	PDF	187 K	Appendix A_Sierra Club	PDF	389 K

Appendix B_Moreno Valley SP 205-Amd No	PDF	11124 K						
Appendix C_Transportation Analysis Scoping Agreement	PDF	696 K	Appendix C_VMT Analysis	PDF	847 K			
Appendix D_AQIA	PDF	6713 K	Appendix D_HRA	PDF	4134 K	Appendix E_GHGA	PDF	1676 K
Appendix F_Energy Assessment	PDF	342 K	Appendix G_Noise Impact Analysis	PDF	12545 K			
Appendix H_MHSCP Consistency Analysis	PDF	4533 K	Appendix I_Geotechnical Investigation	PDF	13466 K			
Appendix I_Phase I Cultural Resources Assessment	PDF	2362 K						
Draft EIR_MoVal BP Building 5_Jan _2025	PDF	25285 K	NOA	PDF	587 K	SCH Summary Form	PDF	324 K

**Notice of Completion [NOC] Transmittal form**

NOC	PDF	490 K
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**Disclaimer:** The Governor's Office of Land Use and Climate Innovation (LCI) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. For more information, please visit [LCI's Accessibility Site](#).

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH  
STATE CLEARINGHOUSE  
SCH No. 2023080366

**Response SCH-1**

State Clearinghouse receipt of the Moreno Valley Business Park Building 5 Project Draft EIR is acknowledged, as is the distribution of the Draft EIR to the listed State Agencies. The State-assigned Clearinghouse reference number (SCH No. 2023080366) and dates of the public review period for the Draft EIR (January 16 through March 3, 2025) are also acknowledged.



CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

## California Department of Transportation

DISTRICT 8  
464 WEST 4TH STREET  
SAN BERNARDINO CA, 92401  
(909) 925-7520  
[www.dot.ca.gov](http://www.dot.ca.gov)



February 20, 2025

Route & Postmile #: SR 60– PM 15.38  
Cross Street: Heacock Street & Ironwood Avenue  
GTS ID: 35179  
SCH #: 2023080366

City of Moreno Valley  
Planning Division  
Attn: Danielle Harper-Scott  
14177 Frederick Street  
P. O. Box 88005  
Moreno Valley CA 92552-0805

**Subject: Moreno Valley Business Park Building 5 Draft EIR – Southeast corner of Heacock Street and Ironwood Avenue, Moreno Valley, CA 92557.**

The California Department of Transportation (Caltrans) Local Development Review (LDR) branch has completed the evaluation of the Moreno Valley Business Park Building 5 Draft EIR.

The project consists of a 220,390 square foot industrial building (Building 5), which will be evaluated assuming 154,270 square feet of warehousing use (70% of the overall square footage), 33,060 square feet of manufacturing use (15% of the overall square footage), and 33,060 square feet of high-cube cold storage warehouse use (15% of the overall square footage) for a total of 220,390 square feet of industrial uses.

DOT-1

Based on the information provided in the Draft EIR and its associated documents, we are submitting the following comments for your consideration:

### Traffic Operations

1. Since the project is located near a freeway facility, please provide a Traffic Impact Study (TIS) report for review.
2. The report should include an analysis of the ramp merge and diverge conditions at the SR-60/Heacock Street interchange, for both the westbound and eastbound directions, to assess any potential impacts of the development at this location.
3. Please follow the Caltrans Transportation Impact Study Guide (May 20, 2020) for the Vehicle Miles Traveled (VMT) Screening Analysis and include the VMT analysis in the report.

DOT-2

"Improving lives and communities through transportation"

4. The report should also include queuing analysis calculations to assess potential impacts.

DOT-2  
(cont'd)

### **Active Transportation**

According to the DEIR for this project, although alternative travel was not considered in the VMT analysis as noted on page 4.2-6. There is a mention that "on a long-term basis, project may result in increased demand for public transportation as increased employment opportunities become available on-site." Given an increase of truck travel to the site, as well as existing usage of the street network from bicyclists, pedestrians, transit vehicles and other motorized vehicles, the site design and tenant's facility management (when occupied) should anticipate and ensure that truck queues would not adversely impact the air quality, circulation (including transit boarding and alighting), as well as safety of other modal users on adjacent streets, freeways and surrounding areas.

Existing transit service (Riverside Transit Agency Route 11) routing as described in the DEIR is inaccurate. Route 11 travels E-W along Ironwood Ave, *not* along the northern project boundary, but along the western project boundary, as transit vehicles turn from/ to Heacock St. towards/ from the south (SR-60). Project applicant should coordinate with RTA and consider making improvements to bus stop locations in both directions in proximity to the project site, in addition to the mention of improvement to bicycle and pedestrian facilities per City requirements (as stated on page 4.2-11).

DOT-3

To achieve transportation demand management towards a reduction in VMT, incentives should be targeted to encourage people to walk, bicycle, rideshare or utilize transit. All users at this location should have an option to be provided financial or equipment incentives, including commute assistance (thru IE Commuter), complimentary transit passes, subsidized bicycle purchases or vanpool arrangements. If not already considered in the site plan, changing/ locker rooms and secure bicycle storage areas are among amenities that may encourage bicycle travel and reduce vehicular parking need.

### **Equitable Access**

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

DOT-4

### **Caltrans Encroachment Permit**

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit.

For information regarding the Encroachment Permit application and submittal requirements, contact:

Caltrans Office of Encroachment Permits  
464 West 4th Street, Basement, MS 619  
San Bernardino, CA 92401-1400  
(909) 383-4526  
[D8.E-permits@dot.ca.gov](mailto:D8.E-permits@dot.ca.gov)

DOT-5

<https://dot.ca.gov/programs/traffic-operations/ep>

↑ DOT-5  
(cont'd)

Thank you again for including Caltrans in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email [LDR-D8@dot.ca.gov](mailto:LDR-D8@dot.ca.gov) or call 909-925-7520.

↓ DOT-6

Sincerely,



**Janki Patel**

Branch Chief - Local Development Review  
Division of Transportation Planning  
Caltrans District 8

California Department of Transportation, District 8  
464 West 4th Street  
San Bernardino, CA 92401

Letter dated February 20, 2025

**Comment DOT-1**

*The California Department of Transportation (Caltrans) Local Development Review (LDR) branch has completed the evaluation of the Moreno Valley Business Park Building 5 Draft EIR.*

*The project consists of a 220,390 square foot industrial building (Building 5), which will be evaluated assuming 154,270 square feet of warehousing use (70% of the overall square footage), 33,060 square feet of manufacturing use (15% of the overall square footage), and 33,060 square feet of high-cube cold storage warehouse use (15% of the overall square footage) for a total of 220,390 square feet of industrial uses.*

*Based on the information provided in the Draft EIR and its associated documents, we are submitting the following comments for your consideration:*

**Response DOT-1**

Commenter summary description of the Project is materially correct. Please refer also to the detailed description of the Project presented in EIR Section 3.0, *Project Description*.

Findings and conclusions of the EIR are not affected.

**Comment DOT-2**

***Traffic Operations***

- 1. Since the project is located near a freeway facility, please provide a Traffic Impact Study (TIS) report for review.*
- 2. The report should include an analysis of the ramp merge and diverge conditions at the SR-60/Heacock Street interchange, for both the westbound and eastbound directions, to assess any potential impacts of the development at this location.*

3. Please follow the Caltrans Transportation Impact Study Guide (May 20, 2020) for the Vehicle Miles Traveled (VMT) Screening Analysis and include the VMT analysis in the report.
4. The report should also include queuing analysis calculations to assess potential impacts.

### **Response DOT-2**

The commenter asserts that a Project Traffic Impact Study (TIS) is required. The Lead Agency disagrees. Per Lead Agency traffic analysis criteria, a detailed TIS is not required for developments that generate fewer than 100 peak hours trips. As substantiated at DEIR Appendix C: Transportation Analysis Scoping Agreement, the Project would generate fewer than 100 peak hour trips (both actual vehicles and PCE). On this basis, the Lead Agency has determined that a detailed Project TIS is not required or warranted. The Lead Agency is not obligated to prepare every study or analysis requested by commenters.

Additionally, the commenter provides no evidentiary support indicating how the Project would result in potentially significant impacts at Caltrans facilities. Proximity to Caltrans facilities of itself does not mandate a detailed Project TIS. Further, potential Level of Service (LOS) deficiencies affecting Caltrans facilities is not a CEQA consideration. Queuing at the Project driveways is not an issue of concern as demonstrated in the Project Queuing Analysis,<sup>1</sup> provided at FEIR Attachment 1. As summarized in the Queuing Analysis:

The 95th percentile queue length is calculated as 2 times the average number of trucks. The maximum hourly truck volume for purposes of queueing evaluation is 4 trucks per hour. As shown on [Queuing Analysis] Exhibit 2, the Project entry can accommodate up to 5 trucks at any given time. This queuing capacity is more than adequate for the anticipated 95th percentile demand of 4 trucks for the entire hour (Queuing Analysis, p. 3).

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<sup>1</sup> *Festival at Moreno Valley* [Moreno Valley Business Park Building 5] Queuing Evaluation (Urban Crossroads, Inc.) May 20, 2025.

All Project improvements would be required to conform to established City engineering safety standards, precluding potential traffic safety hazards due to a Project design feature (DEIR pp. 4.2-14, 4.2-15, et al). Lastly, new development within the City (including the Project) is required to pay Transportation Uniform Mitigation Fees (TUMF), acting to offset incremental effects of City development on Caltrans facilities.

VMT analysis is already included in the EIR (see EIR Section 4.2, *Transportation*, 4.2.1 *VMT Analysis*; EIR Appendix C, *Transportation Analysis*. As provided at CEQA Guidelines Section 15064.3 (b) (4) “[a] lead agency has discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure.” The EIR VMT analysis was prepared consistent with VMT analysis methodologies presented in City of Moreno Valley *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment* (City of Moreno Valley Transportation Engineering Division) June 2020. The EIR VMT analysis substantiates that all Project VMT impacts would be less-than-significant.

Findings and conclusions of the EIR are not affected.

### **Comment DOT-3**

#### ***Active Transportation***

*According to the DEIR for this project, although alternative travel was not considered in the VMT analysis as noted on page 4.2-6. There is a mention that “on a long-term basis, project may result in increased demand for public transportation as increased employment opportunities become available on-site.” Given an increase of truck travel to the site, as well as existing usage of the street network from bicyclists, pedestrians, transit vehicles and other motorized vehicles, the site design and tenant’s facility management (when occupied) should anticipate and ensure that truck queues would not adversely impact the air quality, circulation (including transit boarding and alighting), as well as safety of other modal users on adjacent streets, freeways and surrounding areas.*



*Existing transit service (Riverside Transit Agency Route 11) routing as described in the DEIR is inaccurate. Route 11 travels E-W along Ironwood Ave, not along the northern project boundary, but along the western project boundary, as transit vehicles turn from/ to Heacock St. towards/ from the south (SR-60). Project applicant should coordinate with RTA and consider making improvements to bus stop locations in both directions in proximity to the project site, in addition to the mention of improvement to bicycle and pedestrian facilities per City requirements (as stated on page 4.2-11).*

*To achieve transportation demand management towards a reduction in VMT, incentives should be targeted to encourage people to walk, bicycle, rideshare or utilize transit. All users at this location should have an option to be provided financial or equipment incentives, including commute assistance (thru IE Commuter), complimentary transit passes, subsidized bicycle purchases or vanpool arrangements. If not already considered in the site plan, changing/ locker rooms and secure bicycle storage areas are among amenities that may encourage bicycle travel and reduce vehicular parking need.*

### **Response DOT-3**

The commenter speculates that truck queuing at the Project site driveways could result in air quality, safety, and circulation impacts. The commenter offers additional remarks regarding area transit services and alternative transportation modes as VMT reduction measures. These topics are further discussed below

#### **Truck Queuing**

Commenter remarks regarding potential truck queuing and access at the site could result in potentially adverse air quality, circulation system, and safety impacts. Commenter remarks here are speculative and not supported by evidence. As indicated at Response DOT-2, the Project would not result in queuing that would cause potentially significant environmental impacts. All Project improvements, including driveways, would be designed and implemented consistent with City design and construction requirements. This precludes or minimizes potential queuing issues and potential access safety hazards. See EIR pp. 1-6, 3-12, 4.2-10 – 4.2-15. The DEIR AQIA and updated AQIA/GHGA modeling prepared as part of this FEIR substantiate that the Project would not result in

any potentially significant regional or localized air quality impacts, including any potentially significant localized emissions impacts at sensitive receptors. See also EIR Section 4.3, *Air Quality*; EIR Appendix D, *Air Quality Impact Analysis*; Response DOT-2; Response AQMD-4; FEIR Attachment 2 - *May 2025 Air Quality Impact Assessment and Greenhouse Gas Assessment*.

#### Area Transit Services

As noted by the commenter and as presented in the DEIR, the Applicant would coordinate with RTA regarding transit improvements in the Project vicinity (EIR, p. 4.2-12, et. al). Commenter remarks regarding existing RTA Route 11 are noted. To clarify for the commenter: RTA Route 11 currently exists along Ironwood Avenue, west of the Project site. Ironwood Avenue comprises the Project site northern boundary. This has no effect on the DEIR analysis.

#### Alternative Transportation Modes/VMT Reduction Measures

The Project would incorporate alternative transportation modes including pedestrian and bicycle amenities consistent with City of Moreno Valley and CALGreen requirements (EIR, pp. 4.2-11, 4.4-23, et. al). The EIR substantiates that the Project VMT impacts are less-than-significant (EIR Section 4.2, *Transportation*; EIR Appendix C, *Transportation Analysis*). Measures to reduce Project VMT impacts are therefore not required. The Lead Agency may consider additional measures, including those suggested by the commenter, to encourage use of alternative transportation modes.

Findings and conclusions of the EIR are not affected.

#### Comment DOT-4

##### ***Equitable Access***

*If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.*



#### **Response DOT-4**

All Project access improvements would be designed and constructed consistent with ADA standards. The Lead Agency ensures compliance with ADA standards through established design and development review processes.

Findings and conclusions of the EIR are not affected.

#### **Comment DOT-5**

##### ***Caltrans Encroachment Permit***

*Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit.*

*For information regarding the Encroachment Permit application and submittal requirements, contact:*

*Caltrans Office of Encroachment Permits*

*464 West 4th Street, Basement, MS 619*

*San Bernardino, CA 92401-1400*

*(909) 383-4526*

*D8.E-permits@dot.ca.gov*

*<https://dot.ca.gov/programs/traffic-operations/ep>*

#### **Response DOT-5**

At this time it is not anticipated that the Project would require improvements or traffic controls that would encroach on Caltrans' ROW(s). Should such encroachment be required, the Applicant would comply with Caltrans encroachment permit requirements. Contact/point of access information regarding encroachment application and submittal requirements are noted.

Findings and conclusions of the EIR are not affected.

**Comment DOT-6**

*Thank you again for including Caltrans in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D8@dot.ca.gov or call 909-925-7520.*

**Response DOT-6**

The Lead Agency appreciates Caltrans' participation in the Project CEQA review process. Commenter contact information is noted.

Findings and conclusions of the EIR are not affected.

**From:** Sahar Ghadimi <sghadimi@aqmd.gov>  
**Sent:** Wednesday, January 22, 2025 10:22 AM  
**To:** Julia Descoteaux <juliad@moval.org>  
**Cc:** Sam Wang <swang1@aqmd.gov>  
**Subject:** Technical data request for the Moreno Valley Business Park Building 5 Project.

Some people who received this message don't often get email from [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov). [Learn why this is important](#)

**Warning: External Email – Watch for Email Red Flags!**

Dear Julia Descoteaux,  
I hope this email finds you well.

South Coast AQMD staff received the Draft Environmental Impact Report (EIR) for the Moreno Valley Business Park Building 5 Project (South Coast AQMD Control Number: RVC250117-01). Staff is currently in the process of reviewing the Draft EIR.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod, Input Files (.csv files)
- Live EMFAC output files
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources  
(i.e., truck operations)

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.  
Thank you.

*Sahar Ghadimi*  
Air Quality Specialist, CEQA IGR  
Planning, Rule Development & Implementation  
South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765  
(909) 396-2392  
[sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov)

AQMD-1

South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Email dated January 22, 2025

**Comment AQMD-1**

*South Coast AQMD staff received the Draft Environmental Impact Report (EIR) for the Moreno Valley Business Park Building 5 Project (South Coast AQMD Control Number: RVC250117-01). Staff is currently in the process of reviewing the Draft EIR.*

*Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:*

- *CalEEMod, Input Files (.csv files)*
- *Live EMFAC output files*
- *Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e., truck operations)*

*You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.*

**Response AQMD-1**

Commenter requests modeling data employed in the EIR air quality analyses. Requested modeling files were provided via email on March 11, 2025.

Findings and conclusion of the EIR are not affected.



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL:

March 3, 2025

[planningnotices@moval.org](mailto:planningnotices@moval.org)

Danielle Harper-Scott, Senior Planner

City of Moreno Valley

Community Development Department

14177 Frederick Street

Moreno Valley, CA 92553

## **Draft Environmental Impact Report (EIR) for the Moreno Valley Business Park Building 5 Project (Proposed Project) (SCH No: 2023080366)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Moreno Valley is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

AQMD-1

### **Summary of Proposed Project Information in the Draft EIR**

Based on the Appendix D, AQIA, the Proposed Project consists of a single 220,390 square feet (sf) industrial building (Building 5) which will be evaluated assuming 154,270 sf of warehousing use (70% of the overall sf), 33,060 sf of manufacturing use (15% of the overall sf), and 33,060 sf of high-cube cold storage warehouse use (15% of the overall sf) for a total of 220,390 sf of industrial uses.<sup>1</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 103 feet west of the project site.<sup>2</sup> Construction of the Proposed Project was originally anticipated to occur in August 2022 and will last through July 2023. The Proposed Project is located near the southeast corner of Ironwood Avenue at Heacock Street in Moreno Valley.<sup>3</sup>

AQMD-2

### **South Coast AQMD Comments**

The following comments were crafted based on what was solely provided in the Draft EIR, which did not include the technical data and modeling files relied upon for the air quality analysis, because the Lead Agency did not respond to staff's request dated February 19<sup>th</sup> 2025 seeking this additional information. As such, South Coast AQMD staff were unable to conduct a detailed review of the calculations, which hindered being able to fully evaluate the analysis of the air quality and greenhouse gas impacts.

AQMD-3

<sup>1</sup> Appendix D, AQIA, Page 15.

<sup>2</sup> Draft EIR, Page 188.

<sup>3</sup> *Ibid.* Page 13.



Danielle Harper-Scott, Senior Planner

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March 3, 2025

*Request for Updated Air Quality Analysis and Land Use Types in the Draft EIR*

The air quality analysis in Appendix D of the Draft EIR (Appendix D\_AQIA) appears to rely on an outdated version of the California Emissions Estimator Model (CalEEMod) (CalEEMod 2020), even though a more recent, updated web-based version of CalEEMod<sup>4</sup> was available at the time the Notice of Preparation/Initial Study (NOP/IS) was released in August 2023. reflect the current regulatory standards, emission factors, and air quality conditions and the reliance on outdated data raises concerns about the adequacy of the analysis and the potential that the project's air quality impacts were underestimated.<sup>5</sup>

AQMD-4

Additionally, based on Draft EIR, Table 4.3-4 (Preliminary Project Construction Schedule),<sup>6</sup> the construction schedule should be updated. While the document notes that if construction occurs after the dates presented, incremental and aggregate construction-source emissions would likely decrease due to the natural turnover of older vehicles and the adoption of more fuel-efficient equipment, it is still important to provide accurate construction dates. This will help ensure the analysis reflects the most precise and reliable results.

AQMD-5

Additionally, the project description in the Draft EIR provides a general overview of the proposed light industrial uses of approximately 220,390 square feet. However, it lacks a detailed breakdown of these uses. Specifically, it does not specify the square footage allocated to different industrial activities, such as manufacturing, high-cube cold storage, and warehouse operations. In contrast, Appendix D, the AQIA, does provide this detailed breakdown, itemizing the square footage for each specific land use. This discrepancy creates a lack of clarity and consistency, hindering accurate emission estimations. To ensure clarity, consistency, accuracy of assumptions for emission estimations, and a comprehensive understanding of the project's scope, the Draft EIR should include the footprint size of these various land use types. This information is essential for determining the accurate trip generation rates and quantifying the associated air emissions. Without this level of detail, the air quality impact analysis provided in the Draft EIR may not accurately reflect the proposed project's actual operational characteristics. Therefore, the Lead Agency is recommended to:

AQMD-6

1. Update the construction schedule to reflect the actual timeline and revise the project description in the Draft EIR to include a clear and detailed breakdown of the square footage allocated to each distinct industrial land use.
2. Update the air quality analysis and calculations to align with the proposed project's full scope and projected land use types by running the latest version of CalEEMod; and
3. Provide South Coast AQMD with the technical data and modeling files

*Localized Significance Threshold Analysis during Construction and Operation*

<sup>4</sup> CalEEMod Web-based version:  
<https://www.caleemod.com/>

<sup>6</sup> Draft EIR. Page 182.

Danielle Harper-Scott, Senior Planner

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March 3, 2025

The localized significance threshold (LST) analysis in the Draft EIR appears to incorrectly rely upon the LST screening tables, which, as noted in table 3-2 of the LST methodology<sup>7</sup>, are not appropriate for determining the level of significance for projects sized larger than five acres. Since the Proposed Project covers approximately 9.98 acres, the Lead Agency is recommended to perform project-specific dispersion modeling to determine operational localized air quality impacts for the Proposed Project and include the results in the Final EIR.

AQMD-7

*Mobile Source Emissions: Inconsistencies in Truck Trip Lengths and Vehicle Miles Traveled (VMT)*

In Appendix D of the Draft EIR, the AQIA quantifies the projected truck emissions by assuming a one-way truck trip length of 40 miles and that the truck trips are 100% primary trips. However, the Proposed Project site is located approximately 80 miles from the Ports of Long Beach and Port of Los Angeles which means that the air quality analysis substantially underestimated the emissions from trucks traveling between the Ports and the Proposed Project site.

AQMD-8

Therefore, the Lead Agency is recommended to revise the calculations by taking a project-specific approach to the vehicle trip length and trip rates by applying more realistic trip lengths, such as 80 miles one-way for Port-related trips. Tailoring these parameters and assumptions to project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

*South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required.

As such, the revised CEQA document should include a discussion about the South Coast AQMD rules that may potentially apply to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>8</sup> Rule 203 – Permit to Operate,<sup>9</sup> Rule 401 – Visible Emissions,<sup>10</sup> Rule 402 – Nuisance,<sup>11</sup> Rule 403 – Fugitive Dust,<sup>12</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>13</sup> Rule 1113 – Architectural Coating,<sup>14</sup> Rule 1166 – VOC Contaminated Soil Excavation,<sup>15</sup> Regulation XIII – New Source Review,<sup>16</sup> Rule 1401 – Air Toxics,<sup>17</sup> Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>18</sup> Rule 1470 –

AQMD-9

<sup>7</sup> South Coast AQMD Final Localized Significance Threshold Methodology available at <https://www.aqmd.gov/docs/defaultsource/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>. Page 28.

<sup>8</sup> South Coast AQMD. Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>9</sup> South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>10</sup> South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>11</sup> South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>12</sup> South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>

<sup>13</sup> South Coast AQMD. Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>14</sup> South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>15</sup> South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

<sup>16</sup> South Coast AQMD. Regulation XIII available at <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>17</sup> South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>18</sup> South Coast AQMD. Rule 1466 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>



Danielle Harper-Scott, Senior Planner

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March 3, 2025

Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,<sup>19</sup> etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD changes from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

AQMD-9  
(cont'd)

For these reasons, the Final EIR should include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

### Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

AQMD-10

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) or myself at [swangl1@aqmd.gov](mailto:swangl1@aqmd.gov) should you have any questions.

<sup>19</sup> South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>



Danielle Harper-Scott, Senior Planner

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March 3, 2025

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

BR:SW:SG

RVC250117-01

Control Number

South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Letter (submitted via email) dated March 3, 2025

**Comment AQMD-1**

*South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Moreno Valley is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.*

**Response AQMD-1**

The Lead Agency appreciates AQMD's participation in the Project CEQA process. Responses to AQMD comments are presented below.

Findings and conclusions of the EIR are not affected.

**Comment AQMD-2**

**Summary of Proposed Project Information in the Draft EIR**

*Based on the Appendix [sic] D, AQIA, the Proposed Project consists of a single 220,390 square feet (sf) industrial building (Building 5) which will be evaluated assuming 154,270 sf of warehousing use (70% of the overall sf), 33,060 sf of manufacturing use (15% of the overall sf), and 33,060 sf of high-cube cold storage warehouse use (15% of the overall sf) for a total of 220,390 sf of industrial uses.<sup>1</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 103 feet west of the project site.<sup>2</sup> Construction of the Proposed Project was originally anticipated to occur in August 2022 and will last through July 2023. The Proposed Project is located near the southeast corner of Ironwood Avenue at Heacock Street in Moreno Valley.*

### **Response AQMD-2**

The commenter's summary description of the Project is materially correct. Please refer also to EIR Section 3.0, *Project Description*.

Findings and conclusions of the EIR are not affected.

### **Comment AQMD-3**

#### **South Coast AQMD Comments**

*The following comments were crafted based on what was solely provided in the Draft EIR, which did not include the technical data and modeling files relied upon for the air quality analysis, because the Lead Agency did not respond to staff's request dated February 19th 2025 seeking this additional information. As such, South Coast AQMD staff were unable to conduct a detailed review of the calculations, which hindered being able to fully evaluate the analysis of the air quality and greenhouse gas impacts.*

### **Response AQMD-3**

The commenter notes that technical modeling files were not received. The Lead Agency regrets this oversight. The requested files have been made available to AQMD (via email transmittal on March 11, 2025). As of the date of this Final EIR preparation, no further comments have been provided by AQMD.

Findings and conclusions of the EIR are not affected.

### **Comment AQMD-4**

#### **Request for Updated Air Quality Analysis and Land Use Types in the Draft EIR**

*The air quality analysis in Appendix D of the Draft EIR (Appendix D\_AQIA) appears to rely on an outdated version of the California Emissions Estimator Model (CalEEMod) (CalEEMod 2020), even though a more recent, updated web-based version of CalEEMod was available at the time the Notice of Preparation/Initial Study (NOP/IS) was released in August 2023. reflect the current regulatory standards, emission factors, and air quality conditions and the reliance on outdated*

*data raises concerns about the adequacy of the analysis and the potential that the project's air quality impacts were underestimated.*

#### **Response AQMD-4**

The commenter notes that an updated version of CalEEMod is available for modeling of air quality impacts. Updated Air Quality Impact Analysis (AQIA) and Greenhouse Gas Assessment (GHGA) modeling, employing the latest version of CalEEMod, is provided at FEIR Attachment 2. The updated emissions modeling reflects the current Project Opening Year (2027). Additionally, based on updated information provided by the Applicant, construction emissions estimates assume a worst-case condition of 15,000 cubic yards of soil import. All other modeling assumptions are consistent with assumptions employed in the previous (January 17, 2022) AQIA and GHGA Modeling. All modeling was conducted consistent with SCAQMD and CalEEMod protocols. Emissions modeling summaries are presented below. Correlating DEIR Tables and discussions are amended accordingly by reference.

**Table 1**  
**Maximum Daily Construction-Source Emissions - Regional Impacts**

Year	Emissions (lbs./day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	*PM <sub>10</sub> T	*PM <sub>2.5</sub> T
<b>Summer</b>						
2026	3.91	34.71	32.27	0.07	7.67	4.37
2027	30.65	23.23	35.75	0.05	2.96	1.42
<b>Winter</b>						
2026	2.06	16.24	21.08	0.03	2.30	1.11
2027	1.93	15.15	20.57	0.03	2.20	1.02
Maximum Daily Emissions	30.65	34.71	35.75	0.07	7.67	4.37
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

**\*Notes:** PM<sub>10</sub>T, PM<sub>2.5</sub>T = PM Total Suspended Particulates.

**Table 2**  
**Maximum Daily Operational-Source Emissions - Regional Impacts**

Emissions Source	Emissions (lbs./day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub> T	PM <sub>2.5</sub> T
	<b>Summer</b>					
Mobile	1.63	13.39	17.89	0.16	7.80	2.20
Area	6.88	0.08	9.59	0.00	0.02	0.01
Energy	0.08	1.41	1.18	0.01	0.11	0.11
TRUs	0.07	0.77	0.92	0.00	0.01	0.01
Cargo Handling Equipment	0.12	0.38	16.44	0.00	0.03	0.03
Maximum Daily Emissions	8.78	16.02	46.02	0.17	7.97	2.36
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
	<b>Winter</b>					
Mobile	1.57	14.02	15.45	0.15	7.80	2.20
Area	5.31	0.00	0.00	0.00	0.00	0.00
Energy	0.08	1.41	1.18	0.01	0.11	0.11
TRUs	0.07	0.77	0.92	0.00	0.01	0.01
Cargo Handling Equipment	0.12	0.38	16.44	0.00	0.03	0.03
Maximum Daily Emissions	7.14	16.57	33.99	0.16	7.95	2.34
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

**\*Notes:** PM<sub>10</sub>T, PM<sub>2.5</sub>T = PM Total Suspended Particulates.

**Table 3**  
**Maximum Daily Construction-Source Emissions - Localized Impacts**

Construction Phase	Year	Emissions (lbs./day)			
		NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Site Preparation	2026	34.61	31.01	7.43	4.31
	Maximum Daily Emissions	34.61	31.01	7.43	4.31
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Grading	2026	19.06	19.09	3.30	1.89
	Maximum Daily Emissions	19.06	19.09	3.30	1.89
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Building Construction	2026	14.76	15.71	0.80	0.74
	2027	13.75	15.61	0.70	0.64
	Maximum Daily Emissions	14.76	15.71	0.80	0.74
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Paving	2026	6.94	9.95	0.30	0.27
	Maximum Daily Emissions	6.94	9.95	0.30	0.27
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Architectural Coating	2026	1.11	1.50	0.03	0.02
	Maximum Daily Emissions	1.11	1.50	0.03	0.02
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

**Table 4**  
**Maximum Daily Operational-Source Emissions - Localized Impacts**

Scenario	Emissions (lbs./day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Summer	2.57	28.15	0.54	0.26
Winter	2.52	18.45	0.53	0.24
Maximum Daily Emissions	2.57	28.15	0.54	0.26
SCAQMD Localized Threshold	270	1,577	5	2
Threshold Exceeded?	NO	NO	NO	NO

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

**Table 5**  
**Total Project GHG Emissions**

Source	Emissions (MT/yr)				
	CO <sub>2</sub> T	CH <sub>4</sub>	N <sub>2</sub> O	R	Total CO <sub>2</sub> e
Annual construction emissions amortized over 30 years	21.64	6.64E-04	1.07E-03	1.19E-02	21.98
Mobile	2011.14	0.04	0.25	2.51	2090.02
Area	4.47	0.00	0.00	0.00	4.49
Energy	558.38	0.05	0.00	0.00	560.78
Water	70.65	1.66	0.04	0.00	124.15
Waste	19.37	1.94	0.00	0.00	67.77
Refrigerants	0.00	0.00	0.00	6.09	6.09
TRUs	0.00	0.00	0.00	0.00	19.24
Cargo Handling Equipment	0.00	0.00	0.00	0.00	47.37
Total CO <sub>2</sub> e (All Sources)	2,941.90 MTCO <sub>2</sub> e/yr				
SCAQMD Screening Threshold	10,000 MTCO <sub>2</sub> e/yr				

**Source:** Moreno Valley Business Park – Phase II [Building 5] Air Quality and Greenhouse Gas Assessment (Urban Crossroads, Inc.) May 13, 2025.

As indicated, employing the latest version of CalEEMod, Project emissions would remain below applicable SCAQMD thresholds. Consistent with previous DEIR discussions, all Project air quality impacts would be less-than-significant.

**Comment AQMD-5**

*Additionally, based on Draft EIR, Table 4.3-4 (Preliminary Project Construction Schedule), the construction schedule should be updated. While the document notes that if construction occurs after the dates presented, incremental and aggregate construction-source emissions would likely decrease due to the natural turnover of older vehicles and the adoption of more fuel-efficient equipment, it is still important to provide accurate construction dates. This will help ensure the analysis reflects the most precise and reliable results.*

**Response AQMD-5**

The Project construction schedule has been amended consistent with the updated anticipated Project Opening Year. Please refer also to Response AQMD-4.

Findings and conclusions of the EIR are not affected.

**Comment AQMD-6**

*Additionally, the project description in the Draft EIR provides a general overview of the proposed light industrial uses of approximately 220,390 square feet. However, it lacks a detailed breakdown of these uses. Specifically, it does not specify the square footage allocated to different industrial activities, such as manufacturing, high-cube cold storage, and warehouse operations. In contrast, Appendix D, the AQIA, does provide this detailed breakdown, itemizing the square footage for each specific land use. This discrepancy creates a lack of clarity and consistency, hindering accurate emission estimations. To ensure clarity, consistency, accuracy of assumptions for emission estimations, and a comprehensive understanding of the project's scope, the Draft EIR should include the footprint size of these various land use types. This information is essential for determining the accurate trip generation rates and quantifying the associated air emissions. Without this level of detail, the air quality impact analysis provided in the Draft EIR may not accurately reflect the proposed project's actual operational characteristics. Therefore, the Lead Agency is recommended to:*

- 1. Update the construction schedule to reflect the actual timeline and revise the project description in the Draft EIR to include a clear and detailed breakdown of the square footage allocated to each distinct industrial land use.*



2. *Update the air quality analysis and calculations to align with the proposed project's full scope and projected land use types by running the latest version of CalEEMod; and*
3. *Provide South Coast AQMD with the technical data and modeling files*

### **Response AQMD-6**

The commenter requests that the Project description be refined to provide “a detailed breakdown” of the Project floor plan. Uses reflected in the Project AQIA are appropriate and representative for purposes of modeling and establish the potential maximum impact condition. The AQIA modeling is based on the best available information and is considered to accurately represent effects of this Project and its context as described at EIR Section 3.0, *Project Description*. Should the final Project designs differ substantially from the Project described and analyzed in the DEIR, the Lead Agency would evaluate those changes consistent with CEQA requirements. This ensures that any potentially new or different impacts would be appropriately addressed.

The commenter reiterates requests for an updated construction schedule, revised modeling protocols, and technical data and modeling files. These comments are previously addressed herein. Please refer to Response AQMD-4, et al.

Findings and conclusions of the EIR are not affected.

### **Comment AQMD-7**

#### **Localized Significance Threshold Analysis during Construction and Operation**

*The localized significance threshold (LST) analysis in the Draft EIR appears to incorrectly rely upon the LST screening tables, which, as noted in table 3-2 of the LST methodology, are not appropriate for determining the level of significance for projects sized larger than five acres. Since the Proposed Project covers approximately 9.98 acres, the Lead Agency is recommended to perform project-specific dispersion modeling to determine operational localized air quality impacts for the Proposed Project and include the results in the Final EIR.*

### **Response AQMD-7**

The commenter asserts that the AQIA LST analysis is not appropriate and requests the analysis be revised employing project-specific dispersion modeling. The Lead Agency considers the DEIR LST methodology and analysis to be appropriate as it represents the potential maximum impact condition and indicates whether further analysis is warranted. As discussed in the AQIA:

Although the total acreage disturbed is more than 5 acres per day for construction activities, the LST Methodology provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all on-site emissions associated with the Project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site construction activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area. On a larger site, the same amount of air pollutants generated would disperse over a larger surface area and would result in a lower concentration once emissions reach the Project-site boundary. As such, LSTs for a 5-acre site during construction are used as a screening tool to determine if further detailed analysis is required (AQIA, p. 51).

Further, as substantiated in the DEIR and within the Responses provided herein, Project operational-source emissions would not result in any potentially significant localized impacts or potentially significant health risk impacts (DEIR, pp. 4.3-51 – 4.3-57; DEIR Appendix D, *Mobile Source Health Risk Assessment*). Please refer also to Response AQMD-4, FEIR Attachment 2.

Findings and conclusions of the EIR are not affected.

**Comment AQMD-8**

**Mobile Source Emissions: Inconsistencies in Truck Trip Lengths and Vehicle Miles Traveled (VMT)**

*In Appendix D of the Draft EIR, the AQIA quantifies the projected truck emissions by assuming a one-way truck trip length of 40 miles and that the truck trips are 100% primary trips. However, the Proposed Project site is located approximately 80 miles from the Ports of Long Beach and Port of Los Angeles which means that the air quality analysis substantially underestimated the emissions from trucks traveling between the Ports and the Proposed Project site.*

*Therefore, the Lead Agency is recommended to revise the calculations by taking a project-specific approach to the vehicle trip length and trip rates by applying more realistic trip lengths, such as 80 miles one-way for Port-related trips. Tailoring these parameters and assumptions to project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.*

**Response AQMD-8**

The commenter asserts that the AQIA underestimates the Project vehicle trip lengths and related mobile-source emissions. The Lead Agency disagrees.

The Lead Agency considers the EIR AQIA and associated EIR discussions to comprise substantial evidence supporting the EIR conclusions regarding the Project air quality impacts generally, and air quality impacts attributable to Project truck traffic specifically. The EIR includes extensive detail, technical modeling employing accepted protocols, prepared by experts in the field of air quality analyses. Here, as required under CEQA, the Lead Agency has made a good faith effort at full disclosure of the Project truck-source air quality impacts.

The commenter states, based on the Project distance from the Ports of Long Beach and Los Angeles (Ports), that a truck trip length of 80 miles should be universally employed

in the AQIA. The commenter assumes that all Project trips need originate or end at the Ports. This is not the case. While certain of the Project truck trips may originate or end at the Ports, to assume that all trips do so is inaccurate and would not present the decision-makers an accurate estimate of the Project's probable air quality impacts. In contrast, the modeling employed in the AQIA reflects the Lead Agency's understanding of the range and types of trips that would likely be generated by the Project described in the EIR Project Description. Employing this information and reflecting the EIR air quality experts' experience with similar projects in similar contexts, the AQIA then appropriately estimates Project truck trip lengths and models the resulting air pollutant emissions. The AQIA thus provides an analysis of likely air quality impacts based on the best available information and what is reasonably feasible in the context of this specific Project.

Findings and conclusions of the EIR are not affected.

#### **Comment AQMD-9**

##### *South Coast AQMD Air Permits and Role as a Responsible Agency*

*If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required.*

*As such, the revised CEQA document should include a discussion about the South Coast AQMD rules that may potentially apply to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>8</sup> Rule 203 – Permit to Operate,<sup>9</sup> Rule 401 – Visible Emissions,<sup>10</sup> Rule 402 – Nuisance,<sup>11</sup> Rule 403 – Fugitive Dust,<sup>12</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>13</sup> Rule 1113 – Architectural Coating,<sup>14</sup> Rule 1166 – VOC Contaminated Soil Excavation,<sup>15</sup> Regulation XIII – New Source Review,<sup>16</sup> Rule 1401 – Air Toxics,<sup>17</sup> Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>18</sup> Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,<sup>19</sup> etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD changes from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency,*

*per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.*

*CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.*

*For these reasons, the Final EIR should include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.*

### **Response AQMD-9**

The commenter notes that permitting from SCAQMD would be required for various stationary equipment that could be located at the Project site. The Lead Agency and Project Applicant would comply with all SCAQMD permitting requirements. SCAQMD's role as a Responsible Agency for permitting purposes is recognized.

It is again noted that Project emissions in all instances would not exceed applicable SCAQMD thresholds. Any incremental emissions from portable equipment would not materially affect the Project's emissions impacts. For illustrative purposes, typical emissions from emergency generator operations are assumed for the Project, as presented below.

	Emissions (lbs/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Summer						
<b>Total Maximum Daily Emissions (w/o assumed emergency fire pumps)</b>	8.78	16.02	46.02	0.17	7.97	2.36
Emergency Fire Pumps Emissions (Typical)	1.97	5.50	5.02	0.01	0.29	0.29
<b>Total Maximum Daily Emissions (w/assumed emergency fire pumps)</b>	<b>10.75</b>	<b>21.52</b>	<b>51.04</b>	<b>0.18</b>	<b>8.26</b>	<b>2.65</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
Winter						
<b>Total Maximum Daily Emissions (w/o assumed emergency fire pumps)</b>	7.14	16.57	33.99	0.16	7.95	2.34
Emergency Fire Pumps Emissions (Typical)	1.97	5.50	5.02	0.01	0.29	0.29
<b>Total Maximum Daily Emissions (w/assumed emergency fire pumps)</b>	<b>9.11</b>	<b>22.07</b>	<b>39.01</b>	<b>0.17</b>	<b>8.24</b>	<b>2.63</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: Urban Crossroads

As indicated, additional emissions that may result from typical on-site portable equipment would not contribute substantially to Project emissions. Emissions would remain well below applicable thresholds, and impacts would remain less-than-significant.

Further, should additional stationary and portable equipment be proposed, such equipment would be subject to SCAQMD permitting requirements, to include Applicant-provided emissions impacts analysis of such equipment. Lastly, the Project in total is

subject to Lead Agency development review processes. Should the final Project designs differ substantially from the Project described and analyzed in the DEIR (including provision of substantial additional quantities of stationary/portable equipment), the Lead Agency would evaluate those changes consistent with CEQA requirements. This ensures that any potentially new or different impacts would be appropriately addressed.

Findings and conclusions of the EIR are not affected.

### **Comment AQMD-10**

#### **Conclusion**

*As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.*

*Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) or myself at [swang1@aqmd.gov](mailto:swang1@aqmd.gov) should you have any questions.*

### **Response AQMD-10**

Written responses to all AQMD comments have been provided as required under PRC section 21092.5(a) and CEQA Guidelines section 15088(b). All comments and issues raised by AQMD have been adequately and appropriately addressed herein consistent with CEQA Guidelines section 15088(c). Contact information provided by AQMD is noted.

Findings and conclusions of the EIR are not affected. No revisions to the EIR are proposed or required.

**From:** Vega, Jaqueline <JaVega@RIVCO.ORG>  
**Sent:** Thursday, February 6, 2025 9:47 AM  
**To:** Vicente, Roxanna <RVicente@Rivco.org>  
**Cc:** Planning Notices\_DG <planningnotices@moval.org>  
**Subject:** Re: Mail Transmittal Scan 1\_2025

**Warning: External Email – Watch for Email Red Flags!**

Hello,

Thank you for transmitting the above referenced project to ALUC for review. Please note that the project is located outside the AIA, and review by the ALUC is not required.

ALUC-1

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**From:** Vicente, Roxanna <[RVicente@Rivco.org](mailto:RVicente@Rivco.org)>  
**Sent:** Tuesday, February 4, 2025 4:02 PM  
**To:** Vega, Jaqueline <[JaVega@RIVCO.ORG](mailto:JaVega@RIVCO.ORG)>  
**Cc:** [planningnotices@moval.org](mailto:planningnotices@moval.org) <[planningnotices@moval.org](mailto:planningnotices@moval.org)>  
**Subject:** Mail Transmittal Scan 1\_2025

Hi Jackie,

Please see the attached transmittal for your review, thank you.

Regards,

Roxanna Vicente

Executive Assistant II – TLMA ALUC



Riverside County Airport Land Use Commission  
No Address Provided

Email dated February 6, 2025

**Comment ALUC-1**

*Thank you for transmitting the above referenced project to ALUC for review. Please note that the project is located outside the AIA, and review by the ALUC is not required.*

**Response ALUC-1**

The City appreciates the commenter's participation in the Project CEQA review process. Findings and conclusions of the EIR are not affected. No revisions to the EIR are proposed or required.

**From:** [Danielle Harper-Scott](#)  
**To:** [Emily Elliott](#)  
**Subject:** [External] FW: Moreno Valley Business Park Building 5 Project  
**Date:** Thursday, February 6, 2025 8:02:17 AM

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**Warning: External Email – Watch for Email Red Flags!**

**Danielle Harper-Scott**

**Principal Planner**

**Community Development**

**City of Moreno Valley**

p: 951.413.3224 | e: [danielleh@moval.org](mailto:danielleh@moval.org) w: [www.moval.org](http://www.moval.org)

14177 Frederick St., Moreno Valley, CA, 92553

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**From:** Mauricio Alvarez <[malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)>

**Sent:** Thursday, February 6, 2025 7:59 AM

**To:** Planning Notices\_DG <[planningnotices@moval.org](mailto:planningnotices@moval.org)>

**Subject:** Moreno Valley Business Park Building 5 Project

**Warning: External Email – Watch for Email Red Flags!**

Good Morning,

Thank you for including RTA in the development review of the Moreno Valley Business Park Building 5 Project. After reviewing the plans, there are no comments to submit for this particular project.

RTA-1

Thank you,

**Mauricio Alvarez, MBA**

Planning Analyst

Riverside Transit Agency

p: 951.565.5260 | e: [malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)

[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)

1825 Third Street, Riverside, CA 92507

Riverside Transit Agency  
1825 Third Street  
Riverside, CA 92507

Email dated February 6, 2025

**Comment RTA-1**

*Thank you for including RTA in the development review of the Moreno Valley Business Park Building 5 Project. After reviewing the plans, there are no comments to submit for this particular project.*

**Response RTA-1**

The City appreciates the commenter's participation in the Project CEQA review process. Findings and conclusions of the EIR are not affected. No revisions to the EIR are proposed or required.



# SAN GORGONIO CHAPTER

*Moreno Valley/Box Springs Group*

SENT VIA EMAIL  
March 3, 2025

Danielle Harper-Scott, Principal Planner  
Patty Rodriguez, City Clerk  
City of Moreno Valley  
Email: [planningnotices@moval.org](mailto:planningnotices@moval.org); [cityclerk@moval.org](mailto:cityclerk@moval.org)

RE: Public comment for the Moreno Valley Business Park Building 5, SCH# 2023080366 - Draft EIR

Dear City of Moreno Valley Planning Staff,

Thank you for the opportunity to provide comments on the draft Environmental Impact Report (EIR) on the Moreno Valley Business Park Building 5 (the Project) – SCH# 2023080366.

The Project aims to place a 220,309 sq.ft. warehouse on the corner property of Ironwood Avenue and Heacock Street in Moreno Valley. This action requires upzoning the current plan and zoning from commercial to light industrial. The property is surrounded to the north, northwest, and west by single-family residential communities and a few small commercial storefronts and is adjacent to about 400,000 square feet of industrial warehouses to the east and south. The community census tract directly to the west 06065042405 is in the 82<sup>th</sup> percentile for cumulative impact score in CalEnviroScreen4.0 and the Moreno Valley Environmental Justice element specifically identifies adjacent tracts as disadvantaged communities. The project consists of discretionary actions for multiple changes to amend the general plan and specific plan to accommodate the more intense industrial development proposed.

In our review, the Sierra Club Box Springs Group found the Project EIR is deficient in multiple areas. A summary is listed here, with detailed information in the body of the letter supporting each claim.

1. Environmental Justice was not analyzed as an environmental impact in the draft EIR, despite the CalEnviroScreen4.0 scores and designation in the superseded 2040 General Plan Chapter 8 Environmental Justice element. Environmental Justice was required to be incorporated by all municipalities under SB 1000 starting in 2018. Moreno Valley incorporated environmental justice in its 2040 General Plan process, but that plan was overturned. Nonetheless, the city of Moreno Valley has a template for analyzing environmental justice and is required to incorporate Environmental Justice in its planning process.
2. The Cumulative Impacts analysis is based on the projected buildout from the 2006 General Plan, which is inaccurate, out-of-date, and did not include environmental impacts from projects such as the World Logistics Center. Please update the Cumulative Impacts Analysis to account for local and regional warehouse development including the World Logistics Center (40.4M square feet),

SC-1



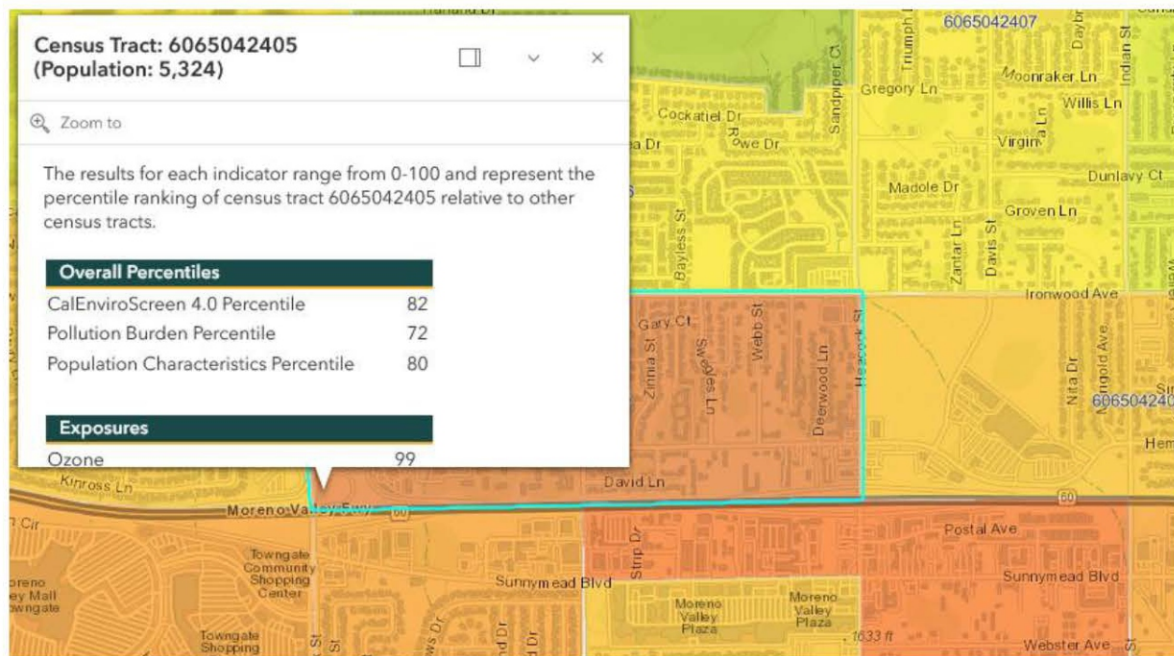
- Beaumont Pointe Commerce Center (5M square feet), the Merwin Property Project, the Crystal Windows Headquarter Project and other large projects not included in the 2006 General Plan.
3. The Air Quality analysis is inadequate and makes numerous errors. Please compare to the current air quality standards for the federal (NAAQS) and state (CAAQS) standards. Please perform a cumulative health risk assessment that includes adjacent warehouse projects, adjacent truck routes, and the SR-60 Freeway in analyzing cumulative cancer risk in order to properly inform decision-makers and adequately mitigate impacts.
  4. Multiple conflicts with Land Use and Planning goals for active transportation, land-use planning, truck routes, visibility, and EJ community impacts
  5. The Alternatives analysis is inaccurate and based on assumptions from previous planning documentation that no longer apply. The project fails to consider alternatives that meet existing Business Park zoning that would provide the buffering between residential districts and industrial/warehouse structures larger than 50,000 sq.ft. described in the industrial zoning descriptions.

SC-1  
(cont'd)

## Environmental Justice

The Project fails to mention that it is asking for a more intensive upzone of use in the most impacted census tract in the City of Moreno Valley under the CalEnviroScreen4.0 tool. **Figure 1** displays a screenshot of the CalEnviroScreen4.0 census tract where the Project is located.

**Figure 1.** CalEnviroScreen4.0 indicator map screenshot for the adjacent census tract. Screenshot taken 2/28/2025<sup>1</sup>.



SC-2

City of Moreno Valley policies in the adopted EJ element within the General Plan require various steps to reduce pollution exposure, improve community health, provide safe housing, and ensuring community participates in the planning process. However, the draft EIR provides no indication or checklists that these issues were considered for this project.

<sup>1</sup> [https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4\\_0/](https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/)

The City should take all necessary steps to ensure that the project mitigates its negative impacts on adjacent vulnerable community members. The first step is going through the EJ policy guidelines in Chapter 8 of its disapproved General Plan 2040 and ensuring that all Goals EJ-1 through EJ-4 are adequately covered by this EIR and this project's mitigation plan. Given that this project is asking for a zone change and is adjacent to dozens of homes that are already extensively overburdened with local warehouses and truck emissions, extensive mitigation is necessary to remediate the impacts of the project.

SC-2  
(cont'd)

## Cumulative Impacts

The project DEIR uses a 'summary-of-projections' methodology as described in CEQA guidelines for cumulative analysis. However, it uses the 2006 General Plan from Moreno Valley as its primary document source. The 2006 General Plan did not include the World Logistics Center and other mega-warehouse projects within the region in its EIR process. As a result, it is drastically inaccurate to use to characterize a 'buildout' summary contributing to cumulative impacts.

Please include other key mega-warehouse projects along the 215/60 corridor, such as the World Logistics Center (40.4M sq.ft.), Stoneridge Commerce Center (7.9M sq.ft.), Harvest Landing Retail Center (5.7M sq.ft.), and Beaumont Pointe (5.5M sq.ft.). These projects will all use the same 215 and 60 corridor for truck trips, leading to ever more truck congestion, road maintenance costs, and pollution that will directly and indirectly impact the residents adjacent to the project. Additionally, it is important to include other large regional projects that the City of Moreno Valley or its representatives approved including:

- March Business Center (2009) – General Plan Amendment allowing 1,484,407 square feet of industrial warehouse space on 66.9-acres
- First Nandina Logistics Center Project (2014) - 1,450,000 square feet warehouse space
- Prologis Eucalyptus Industrial Park Project (2015) - 2,244,419 square feet of warehouse uses including a General Plan Amendment from residential to Light Industrial
- Brodiaea Commerce Center (2017) - 262,398 square foot warehouse including a rezone from Business Park-Mixed Use to "Light Industrial"
- Moreno Valley Business Park (2021) - 220,390 square feet of warehouse logistics development including a General Plan Amendment to from commercial to light industrial
- Compass Danbe Centerpointe (2021) –approval for a General Plan Amendment to allow the development of two light industrial buildings of 389,603 square feet
- Heacock Commerce Center (2025) – pending application for a General Plan Amendment and Change of Zone for two high cube industrial buildings totaling 873,967 square feet
- Bay & Day Commerce Center (2025) – pending application for the development of a 194,775-square foot commerce center project with Change of Zone from business park to light industrial to allow a warehouse greater than 50,000 square feet.
- Veteran's Industrial Park 215 Project (2021) – a change of zone from aviation to light industrial for a 1,900,000 square foot warehouse adjacent to March Air Reserve Base (2021) – March Joint Powers Authority approved.
- West Campus Upper Plateau (2025 – pending) – pending application for up to 4.7 million square feet of warehouses requiring a general plan amendment and zone change from business park to light industrial.
- K4 Warehouse (2019) – Rezone and general plan amendment for a 718,000 square foot warehouse on Cactus Avenue (MIPA).

SC-3



- Freeway Business Center (2018) – Rezone and general plan amendment for a 709,000 square foot warehouse on Alessandro and Old 215 (MIPA)

Note, this is just additional warehouses that were not planned for in the City of Moreno Valley 2006 General Plan. We could also ask to include housing projects like Aquabella Specific Plan Amendment (2024) or the Moreno Valley Mall Redevelopment Project (2023).

SC-3  
(cont'd)

## Air Quality

There are major issues with the analysis performed. First, the air quality analysis for both the health risk assessment and transportation analysis were completed in January 2022, more than 18 months prior to the Notice of Preparation data of August 2023. The air quality analyses were completed prior to received comments from the South Coast Air Quality Management District, who submitted a comment letter on health risk assessment and mitigation strategies in September 2023, as did the Sierra Club. The air quality analysis needs to be amended to address changes in the project, changes in the fleet characteristics, and incorporate/address public comments.

None of the comments were addressed in the EIR, because the analysis was completed and submitted 18 months prior for an earlier version of the project.

Key issues I found include a failure to include the cumulative impacts of multiple warehouse projects and truck routes on the residential structures in the health risk analysis. This underestimates cumulative risk, which is the relevant standard. Please include all adjacent warehouses and the truck route emissions from Heacock, Ironwood, and SR-60. Specifically, this project is a missing part of the Festival Specific Plan area and the cumulative impacts of all warehouses need to be addressed in total, not piecemeal via incremental planning.

Additionally, there were about 10 errors due to this section being a copy-paste of an older document without updating for current 2024/25 conditions. Please fix all these errors.

- PM<sub>2.5</sub> standard is out-of-date - should be 9.0 ug/m<sup>3</sup> as adopted by the EPA in 2024<sup>2</sup>
- NO<sub>2</sub> is nonattainment along SR-60, which trucks for this project will travel along – please update
- Ozone trend stops at 2020 – data is complete through 2024
- Table 4.3.2 is multiple years out of date; most recent complete year is 2023 or 2024, not 2020. Also it shows incorrect annual PM<sub>2.5</sub> standard. Current years should be at least 2021-2023 for most recent three complete years of data. See <http://www.aqmd.gov/home/air-quality/historical-air-quality-data> where data from 2023 is reported.
- Improvements in air quality have stalled for the past 15 years for ozone and we are still nonattainment in multiple categories. With the recent withdrawal of EPA waivers for heavy-duty trucks, there is no path to attainment by 2037 given the disproportionate fraction of emission from the goods movement category.
- P.4.3.22 – attainment demonstrations for SIPs blame poor meteorology, but that is the new climate normal and accounting for that is necessary.
- The description of diesel trucks on pages 4.3-27 and 4.3-28 is literally decades out of date with current regulations.

SC-4

<sup>2</sup> <https://www.epa.gov/criteria-air-pollutants/naaqs-table>

- Air quality emissions scenarios use numbers from 2022 which are inaccurate and unreflective of current light-duty passenger vehicle fleet assumptions for the commercial scenario alternative.

SC-4  
(cont'd)

## Land Use Issues – Rezoning, Housing Replacement

### Rezoning

The Project requires discretionary approval to rezone the existing Commercial designation to Light Industrial/Business Park to accommodate the 220,000 square foot proposed building.

The City General Plan defines the two land-use types in its Chapter 9.05 Ordinances for industrial districts.

- **Business Park District (BP).** The primary purpose of the business park (BP) district is to provide light industrial, research and development, office-based firms and limited supportive commercial in an attractive and pleasant working environment and a prestigious location. This district is intended to provide a transition between residential and other sensitive uses and more intense industrial and warehousing uses.
- **Light Industrial District (LI).** The primary purpose of the light industrial (LI) district is to provide for light manufacturing, light industrial, research and development, warehousing and distribution and multitenant industrial uses, as well as certain supporting administrative and professional offices and commercial uses on a limited basis. This district is intended as an area for light industrial uses that can meet high performance standards. This district requires buffering between residential districts and industrial and warehouse structures greater than 50,000 square feet in building area within the LI district. Please refer to the special site development standards in Section 9.05.040(B)(9).

SC-5

The clearly defined intent of the Business Park district is to provide a smoother transition between sensitive receptors (i.e., homes, parks, churches, schools) and industrial uses. Thus, it requires smaller, less intensive buildings. It should be ‘attractive’, ‘pleasant’, and ‘prestigious’. The Light industrial district is for ‘high performance’ and is distinctly required to ‘require buffering between residential districts for warehouse structures greater than 50,000 sq.ft.’

This is clearly an overreach by the project applicant. Residential uses are adjacent to the site across both Heacock and Ironwood and it is completely inconsistent with city policy to rezone this to Light Industrial for a larger building size while removing all the intentional protections associated with commercial zoning. It is unclear how the city is justifying not providing any alternatives in Section 6 of the EIR that provide an environmental superior alternative that are consistent with a ‘Business Park’ approval that mitigates the requirement for a less intensive industrial use.

### Land Use and Planning

Multiple characterizations of consistency with existing land use and planning in Table 4.10-1 are controversial and potentially erroneous.

- Conflict with multimodal transportation – this project will add more truck trips entering and existing onto Heacock and Ironwood, both of which are major pedestrian/bike paths. Trucks entering and exiting the facility will cross pedestrian and bike infrastructure causing a safety conflict. Vegetative screens required to screen the project from the

SC-6



public are likely to interfere with visibility from tall trucks and courier vehicles for the pedestrians and cyclists approaching the warehouse entrances/exits.

- Conflict with traffic – any left-turning trucks will need to cross multiple lanes of traffic. Please require a traffic plan banning all left-turns out of the project from all entrances/exits.
- Conflict with communities – Light industrial land use is explicitly described by the City code as incompatible with adjacent residential use. A smoother transition is needed, which means that the Business Park zoning is the appropriate lower intensity option.
- Economy – warehouse uses are inherently low density, low quality job uses with anti-union occupants. It is possible to remediate with community benefits agreement mandating local hiring and pay scales.
- Larger buildings change the character and nature of an area and, in-and-of-themselves, a significant and unavoidable impact to aesthetics, walkability, and land-use compatibility.
- The Festival Specific Plan intended for this project to have a connection point to Davis Street, as shown in the attached document. The Appendix B Amendment to Specific Plan 205 amended in 2021 is invalid because it was not supported by adequate environmental documentation by the City of Moreno Valley. The City has not complied with the court order to rescind the invalid 2021 amendments and is instead including them as an attachment in CEQANET (Appendix B) to the project documentation. We ask that all analyses conform to the 2018 valid amendment document (attached).

SC-6  
(cont'd)

## Alternatives Analysis

The set of project alternatives considered includes a no build scenario, a commercial build scenario, and a reduced industrial intensity scenario. Air quality, VMT, and GHG emissions from these scenarios were completed 18 months prior to the project NOP date, resulting in inaccurate projections of impacts from these alternatives by Urban Crossroads. This is especially important for the commercial project scenario, which relies on fleet projections prior to adoption of the Advanced Clean Cars II rule in 2023 by CARB which will reduce emissions through more stringent requirements for EV adoption in future years. Therefore, it is imperative that this scenario be reanalyzed using current fleet years and compared to the industrial warehouse alternative which will have no such restrictions because of the withdrawal of CARB's Advanced Clean Fleets rules for trucks. Trucks will therefore be comparatively dirtier in future years.

SC-7

Secondarily, it is important to ensure a reduced intensity alternative that considers the impact of the large building on adjacent aesthetics and property values. A 220,000 square foot warehouse is significantly larger than surrounding residential and office properties. The Business Park zoning is supposed to accommodate a smoother transition and limits industrial property development to 50,000 square foot buildings to reduce these types of impacts. Sierra Club would like to see a Business Park conforming industrial alternative instead of a 160,000 square foot building that looms over adjacent properties.

## Summary

Thank you again for the opportunity to provide comments on the draft Environmental Impact Report (EIR) on the Moreno Valley Business Park Building #5 project SCH #202308366. We hope these comments are taken seriously and addressed fully to mitigate the significant unaddressed impacts associated with this project.

SC-8

Please keep the Sierra Club Box Springs Group notified of all documents and meetings related to the project.

SC-8  
(cont'd)

Sincerely,

Michael McCarthy, PhD  
Sierra Club  
Moreno Valley/Box Springs Group  
Co-Conservation Chair  
Email: mikem@radicalresearch.llc

P.O. Box 1325  
Moreno Valley, CA 92556-1325

Sierra Club  
Moreno Valley/Box Springs Group  
P.O. Box 1325  
Moreno Valley, CA 92556

Letter (submitted via email) dated March 3, 2025

**Comment SC-1**

*Thank you for the opportunity to provide comments on the draft Environmental Impact Report (EIR) on the Moreno Valley Business Park Building 5 (the Project) – SCH# 2023080366.*

*The Project aims to place a 220,309 sq.ft. warehouse on the corner property of Ironwood Avenue and Heacock Street in Moreno Valley. This action requires upzoning the current plan and zoning from commercial to light industrial. The property is surrounded to the north, northwest, and west by single-family residential communities and a few small commercial storefronts and is adjacent to about 400,000 square feet of industrial warehouses to the east and south. The community census tract directly to the west 06065042405 is in the 82th percentile for cumulative impact score in CalEnviroScreen4.0 and the Moreno Valley Environmental Justice element specifically identifies adjacent tracts as disadvantaged communities. The project consists of discretionary actions for multiple changes to amend the general plan and specific plan to accommodate the more intense industrial development proposed.*

*In our review, the Sierra Club Box Springs Group found the Project EIR is deficient in multiple areas. A summary is listed here, with detailed information in the body of the letter supporting each claim.*

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2. *The Cumulative Impacts analysis is based on the projected buildout from the 2006 General Plan, which is inaccurate, out-of-date, and did not include environmental impacts from projects such as the World Logistics Center. Please update the Cumulative Impacts Analysis to account for local and regional warehouse development including the World Logistics Center (40.4M square feet), Beaumont Pointe Commerce Center (5M square feet), the Merwin Property Project, the Crystal Windows Headquarter Project and other large projects not included in the 2006 General Plan.*
3. *The Air Quality analysis is inadequate and makes numerous errors. Please compare to the current air quality standards for the federal (NAAQS) and state (CAAQS) standards. Please perform a cumulative health risk assessment that includes adjacent warehouse projects, adjacent truck routes, and the SR-60 Freeway in analyzing cumulative cancer risk in order to properly inform decision-makers and adequately mitigate impacts.*
4. *Multiple conflicts with Land Use and Planning goals for active transportation, land-use planning, truck routes, visibility, and EJ community impacts*
5. *The Alternatives analysis is inaccurate and based on assumptions from previous planning documentation that no longer apply. The project fails to consider alternatives that meet existing Business Park zoning that would provide the buffering between residential districts and industrial/warehouse structures larger than 50,000 sq.ft. described in the industrial zoning descriptions.*

### **Response SC-1**

The City of Moreno Valley (Lead Agency) appreciates Sierra Club's participation in the Project CEQA review process. Responses to Sierra Club comments are provided herein.

The commenter provides a summary description of the Project and its land use context. The Project description and land use context summarized by the commenter are materially correct. Detailed Project information is presented in Draft EIR Section 3.0, *Project Description*.

The commenter lists various alleged inadequacies of the EIR. The Lead Agency disagrees with the commenter statements. Responses to the commenter's statements are provided below.

**General Response:** Disagreement among experts does not make an EIR inadequate.

CEQA Guidelines Section 15151. *Standards for Adequacy of an EIR* states the following:

*“An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”*

In this regard, and despite disagreement expressed by the commenter, all analyses prepared as components of the Moreno Valley Business Park Building 5 Project (Project) EIR are considered adequate, complete, and represent a good faith effort at full disclosure of the Project’s potential impacts.

Senate Bill (SB) 1000 was passed into law in 2016, requiring local governments to identify EJ (Environmental Justice) communities (also called “disadvantaged communities”) in their jurisdictions and address EJ in their general plans. This law requires the inclusion of an EJ element when a lead agency is updating two or more General Plan elements and, as part of evaluation of such elements, CEQA documents may address EJ issues. However, the CEQA Guidelines do not include EJ as a resource topic or threshold. In addition, SB 1000 is not an analysis that is performed on a project-by-project basis. The City’s adopted Environmental Justice Element is hereby incorporated into this response.<sup>2</sup>

There is nothing incompatible of siting a warehouse next to residential when a detailed CEQA analysis shows no significant impacts. Such is the case for the Project considered here. In addition, development of light industrial uses at the site such as is proposed by

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<sup>2</sup> [https://moval.gov/city\\_hall/general-plan2040/MV-GeneralPlan-complete.pdf](https://moval.gov/city_hall/general-plan2040/MV-GeneralPlan-complete.pdf)

the Project would be significantly more environmentally friendly than would development under the site's current commercial zoning or under a range of other potential development scenarios. For context, representative emissions estimates for warehouse, shopping center, single-family residential, and multiple-family residential developments are compared below. For the purposes of this comparison, a 40-acre site was selected and the amount of development is based on the average density of similar projects that have recently been completed in Perris. The emissions were calculated using CalEEMod (v. 2020.4.0). The calculations are based on the SCAQMD's default parameters programmed into CalEEMod with the exception of the truck trips for the warehouse use which was changed from 6.9 miles to 40.0 miles consistent with SCQMD recommendations and current City practice.

**ESTIMATED MASS DAILY OPERATIONAL EMISSIONS  
BASED UPON A 40-ACRE SITE DEVELOPMENT ASSUMPTION**

Land Use	Size	Emissions in Pounds per Day					
		VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Unrefrigerated Warehouse	750,000 SF	24.2	15.6	105.4	0.3	24.8	6.8
Shopping Center	300,000 SF	47.2	49.2	323.6	0.7	63.9	17.5
Single Family Residential	200 units	15.0	11.3	82.0	0.2	14.1	4.0
Apartments	560 units	176.1	37.4	487.0	1.1	76.5	52.3

In summary, a 750,000-square-foot warehouse building would generate substantially less emissions than a comparable 40-acre site for a shopping center or an apartment development but would generate greater emissions than a comparatively-sized single family residential development.

SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. Here, the Project does not increase unique or compounded health risks.

Findings and conclusions of the EIR are not affected.

## **Comment SC-2**

### ***Environmental Justice***

*The Project fails to mention that it is asking for a more intensive upzone of use in the most impacted census tract in the City of Moreno Valley under the CalEnviroScreen4.0 tool. Figure 1 displays a screenshot of the CalEnviroScreen4.0 census tract where the Project is located.*

*[Figure 1. CalEnviroScreen4.0 indicator map screenshot for the adjacent census tract. Screenshot taken 2/28/2025]*

*City of Moreno Valley policies in the adopted EJ element within the General Plan require various steps to reduce pollution exposure, improve community health, provide safe housing, and ensuring community participates in the planning process. However, the draft EIR provides no indication or checklists that these issues were considered for this project.*

*The City should take all necessary steps to ensure that the project mitigates its negative impacts on adjacent vulnerable community members. The first step is going through the EJ policy guidelines in Chapter 8 of its disapproved General Plan 2040 and ensuring that all Goals EJ-1 through EJ-4 are adequately covered by this EIR and this project's mitigation plan. Given that this project is asking for a zone change and is adjacent to dozens of homes that are already extensively overburdened with local warehouses and truck emissions, extensive mitigation is necessary to remediate the impacts of the project.*

## **Response SC-2**

The commenter asserts that the Project would somehow result in “negative impacts on adjacent vulnerable community members.” The commenter provides no evidentiary support for this statement. With regard to environmental justice (EJ) issues generally, CEQA focuses on physical environmental impacts rather than EJ issues. Analyses presented in the DEIR and within these FEIR Responses substantiate that the Project would not result in any significant impacts, and therefore would not result in significant environmental impacts that would disproportionately affect EJ communities. Please refer also to Response SC-1.



Findings and conclusions of the EIR are not affected.

### **Comment SC-3**

#### ***Cumulative Impacts***

*The project DEIR uses a ‘summary-of-projections’ methodology as described in CEQA guidelines for cumulative analysis. However, it uses the 2006 General Plan from Moreno Valley as its primary document source. The 2006 General Plan did not include the World Logistics Center and other mega-warehouse projects within the region in its EIR process. As a result, it is drastically inaccurate to use to characterize a ‘buildout’ summary contributing to cumulative impacts.*

*Please include other key mega-warehouse projects along the 215/60 corridor, such as the World Logistics Center (40.4M sq.ft.), Stoneridge Commerce Center (7.9M sq.ft.), Harvest Landing Retail Center (5.7M sq.ft.), and Beaumont Pointe (5.5M sq.ft.). These projects will all use the same 215 and 60 corridor for truck trips, leading to ever more truck congestion, road maintenance costs, and pollution that will directly and indirectly impact the residents adjacent to the project. Additionally, it is important to include other large regional projects that the City of Moreno Valley or its representatives approved including:*

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*industrial to allow a warehouse greater than 50,000 square feet.*

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- *West Campus Upper Plateau (2025 – pending) – pending application for up to 4.7 million square feet of warehouses requiring a general plan amendment and zone change from business park to light industrial.*
- *K4 Warehouse (2019) – Rezone and general plan amendment for a 718,000 square foot warehouse on Cactus Avenue (MJPA).*
- *Freeway Business Center (2018) – Rezone and general plan amendment for a 709,000 square foot warehouse on Alessandro and Old 215 (MJPA)*

*Note, this is just additional warehouses that were not planned for in the City of Moreno Valley 2006 General Plan. We could also ask to include housing projects like Aquabella Specific Plan Amendment (2024) or the Moreno Valley Mall Redevelopment Project (2023).*

### **Response SC-3**

The commenter asserts the DEIR analysis of cumulative impacts is somehow deficient. The commenter asserts that the DEIR cumulative air quality impacts analyses rely on the 'summary-of-projections' methodology as described in *CEQA Guidelines*. This is incorrect. As stated in the first sentence of the discussion of cumulative impacts (DEIR Section 5.1.1), "Unless otherwise noted herein," the analysis relies on the General Plan as the basis for analysis. Cumulative air quality impact analyses are specifically noted as being subject to criteria and information beyond that available in the General Plan. Here, SCAQMD, the Responsible Agency for CEQA-related air quality impacts has established applicable criteria and methodology for evaluating cumulative air quality impacts. In the absence of any available additional guidance, the Project AIQA and HRA appropriately relied on current available SCAQMD guidance.<sup>3</sup>

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<sup>3</sup> See: SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. SCAQMD has yet to release any updated guidance detailing the manner in which to evaluate cumulative health risks, and no definitive timeline has been released on when guidance is expected.

As discussed in the DEIR, per currently available SCAQMD guidance, project-level impacts that are less-than-significant are not cumulatively significant or cumulatively considerable (DEIR, pp. 5-13 – 5-16 et al.). The DEIR and Responses provided herein substantiate that all Project-level air quality impacts would be less-than-significant. Project air quality impacts in all instances would therefore not be cumulatively significant or cumulatively considerable.

The commenter lists various area developments. The commenter does not provide any evidence of if or how these projects would materially interact with the effects of the Project. These developments are noted and effects of these developments are reflected in background air quality conditions. With specific regard to the larger warehouse projects noted by the commenter (World Logistic Center, approximately 6 miles from the Project site; Stoneridge Commerce Center, approximately 9 miles from the Project site; Harvest Landing Center, approximately 8 miles from the Project site; and Beaumont Pointe Center, approximately 12 miles from the Project site): all of these developments are at distances from the Project substantially greater than 1,000 feet. According to California Air Resources Board (CARB) guidance, emissions from warehouse and distribution center operations dissipate significantly with distance from the source.<sup>4</sup> The health risk from these emissions drops sharply as distance increases, with multiple sources indicating that impacts are substantially reduced (by approximately 80 percent) at distances greater than 1,000 feet. To be considered a potential source of emissions that could contribute considerably to effects of the Project, developments listed by the commenter should be within 1,000 feet of the Project. Such is not the case. Please refer also to Response AQMD-4.

Findings and conclusions of the EIR are not affected.

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<sup>4</sup> <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>

#### **Comment SC-4**

##### ***Air Quality***

*There are major issues with the analysis performed. First, the air quality analysis for both the health risk assessment and transportation analysis were completed in January 2022, more than 18 months prior to the Notice of Preparation data of August 2023. The air quality analyses were completed prior to received comments from the South Coast Air Quality Management District, who submitted a comment letter on health risk assessment and mitigation strategies in September 2023, as did the Sierra Club. The air quality analysis needs to be amended to address changes in the project, changes in the fleet characteristics, and incorporate/address public comments.*

*None of the comments were addressed in the EIR, because the analysis was completed and submitted 18 months prior for an earlier version of the project.*

*Key issues I found include a failure to include the cumulative impacts of multiple warehouse projects and truck routes on the residential structures in the health risk analysis. This underestimates cumulative risk, which is the relevant standard. Please include all adjacent warehouses and the truck route emissions from Heacock, Ironwood, and SR-60. Specifically, this project is a missing part of the Festival Specific Plan area and the cumulative impacts of all warehouses need to be addressed in total, not piecemeal via incremental planning.*

*Additionally, there were about 10 errors due to this section being a copy-paste of an older document without updating for current 2024/25 conditions. Please fix all these errors.*

- PM2.5 standard is out-of-date - should be 9.0 ug/m3 as adopted by the EPA in 2024*
- NO2 is nonattainment along SR-60, which trucks for this project will travel along – please update*
- Ozone trend stops at 2020 – data is complete through 2024*
- Table 4.3.2 is multiple years out of date; most recent complete year is 2023 or 2024, not 2020. Also it shows incorrect annual PM2.5 standard. Current years should be at least 2021-2023 for most recent three complete years of data. See <http://www.aqmd.gov/home/air-quality/historical-air-quality-data> where data from 2023 is reported.*
- Improvements in air quality have stalled for the past 15 years for ozone and we are still nonattainment in multiple categories. With the recent withdrawal of EPA waivers for heavy-duty*

*trucks, there is no path to attainment by 2037 given the disproportionate fraction of emission from the goods movement category.*

- *P.4.3.22 – attainment demonstrations for SIPs blame poor meteorology, but that is the new climate normal and accounting for that is necessary.*
- *The description of diesel trucks on pages 4.3-27 and 4.3-28 is literally decades out of date with current regulations.*
- *Air quality emissions scenarios use numbers from 2022 which are inaccurate and unreflective of current light-duty passenger vehicle fleet assumptions for the commercial scenario alternative.*

#### **Response SC-4**

As substantiated in the DEIR, supporting technical documents, and Responses provided herein, the Project would not result in any significant air quality or health risk impacts. The commenter provides no evidentiary support for statements that the Project's impacts would be other than that presented in the EIR. Please refer also to Responses AQMD-4, SC-3, FEIR Attachment 2.

Commenter states that comments on the NOP have not been addressed. The Lead Agency disagrees. Please refer to EIR Table 1.10-1, *List of NOP/AB 52 Consultation Respondents and Summary of Comments*. The EIR substantiates that the Project would not result in any significant environmental impacts. The Lead Agency is not obligated to prepare every study or analysis requested by commenters.

Commenter asserts that the Project would somehow result in cumulatively significant air quality health risks. The Lead Agency disagrees. The Lead Agency has not adopted cumulative impact significance thresholds for air quality impacts. The Lead Agency has historically relied on SCAQMD thresholds in determining air quality impact significance,

including significance of cumulative air quality impacts and related health risks.<sup>5</sup> SCAQMD uses the same significance thresholds for both project-specific and cumulative impacts, meaning that projects exceeding these thresholds are considered cumulatively significant. As substantiated in the DEIR, and Responses provided herein, all Project-level air quality impacts would be less-than-significant. Per SCAQMD criteria, Project contributions to air quality impacts including health risks would therefore not be cumulatively significant or cumulatively considerable. Please refer also to Responses AQMD-4, SC-3, FEIR Attachment 2.

The commenter notes various discrepancies in air quality baseline conditions reflected in the EIR versus 2024/2025 conditions. The Lead Agency recognizes nominal changes in baseline conditions and/or regulatory standards occurring since the DEIR technical studies were originally prepared. Despite these changes, updated modeling of Project emissions impacts employing the latest available CalEEMod protocols substantiates Project emissions would not exceed applicable thresholds. Please refer to Response AQMD-4, FEIR Attachment 2. Project air pollutant emissions impacts would therefore be less-than-significant.

Other “errors” listed by the commenter are noted. Changes here would not materially affect the EIR findings or conclusions, and would not impact informed decision-making.

Findings and conclusions of the EIR are not affected.

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5 The South Coast Air Quality Management District (SCAQMD) thresholds are considered the appropriate thresholds for evaluating air quality impacts in the Basin based on the following:

- The SCAQMD is the air pollution control agency and CEQA Responsible Agency for air quality considerations affecting the Basin. SCAQMD's thresholds are thus considered the best available benchmark for evaluating air quality impacts.
- SCAQMD has developed Localized Significance Thresholds (LSTs) to evaluate potential localized impacts of projects. These thresholds are particularly useful for assessing the effects of emissions on nearby sensitive receptors.
- Employing SCAQMD thresholds ensures compliance with both state and federal air quality standards. Adherence to SCAQMD thresholds supports efforts to minimize air pollution and improve air quality within the Basin.
- Lead agencies, including cities and counties within the South Coast Air Basin, commonly use SCAQMD thresholds in environmental impact assessments. This widespread adoption further supports use of these thresholds for evaluating air quality impacts.

## **Comment SC-5**

### ***Land Use Issues – Rezoning, Housing Replacement***

#### ***Rezoning***

*The Project requires discretionary approval to rezone the existing Commercial designation to Light Industrial/Business Park to accommodate the 220,000 square foot proposed building.*

*The City General Plan defines the two land-use types in its Chapter 9.05 Ordinances for industrial districts.*

- ***Business Park District (BP).*** *The primary purpose of the business park (BP) district is to provide light industrial, research and development, office-based firms and limited supportive commercial in an attractive and pleasant working environment and a prestigious location. This district is intended to provide a transition between residential and other sensitive uses and more intense industrial and warehousing uses.*
- ***Light Industrial District (LI).*** *The primary purpose of the light industrial (LI) district is to provide for light manufacturing, light industrial, research and development, warehousing and distribution and multitenant industrial uses, as well as certain supporting administrative and professional offices and commercial uses on a limited basis. This district is intended as an area for light industrial uses that can meet high performance standards. This district requires buffering between residential districts and industrial and warehouse structures greater than 50,000 square feet in building area within the LI district. Please refer to the special site development standards in Section 9.05.040(B)(9).*

*The clearly defined intent of the Business Park district is to provide a smoother transition between sensitive receptors (i.e., homes, parks, churches, schools) and industrial uses. Thus, it requires smaller, less intensive buildings. It should be ‘attractive’, ‘pleasant’, and ‘prestigious’. The Light industrial district is for ‘high performance’ and is distinctly required to ‘require buffering between residential districts for warehouse structures greater than 50,000 sq.ft.’*

*This is clearly an overreach by the project applicant. Residential uses are adjacent to the site across both Heacock and Ironwood and it is completely inconsistent with city policy to rezone this to*

*Light Industrial for a larger building size while removing all the intentional protections associated with commercial zoning. It is unclear how the city is justifying not providing any alternatives in Section 6 of the EIR that provide an environmental superior alternative that are consistent with a 'Business Park' approval that mitigates the requirement for a less intensive industrial use.*

#### **Response SC-5**

The commenter states: "The Project requires discretionary approval to rezone the existing Commercial designation to Light Industrial/Business Park to accommodate the 220,000 square foot proposed building." This is incorrect. The commenter here conflates General Plan Land Use and Zoning. The Project proposes a General Plan Amendment (Land Use Element) redesignating the Project site General Plan Land Use from Commercial to Business Park/Light Industrial. Zoning of the Project site is established by the Specific Plan No. 205. As discussed in the EIR, final designs of all Project elements will be realized consistent with design requirements and standards identified within the Specific Plan No. 205, Amendment No. 2 document. Where the Specific Plan No. 205, Amendment No. 2 document is silent, Project designs and development shall comply with applicable provisions of the City of Moreno Valley Municipal Code. The City thus ensures compatibility of the implemented Project with area land uses. The commenter infers that the Project would adversely affect area residential uses. The EIR substantiates that the Project would not result in any adverse impacts.

Subsequent opinions offered by the commenter regarding the appropriate land use designation for the Project are noted. The Lead Agency disagrees with these suggestions. The Lead Agency considers the requested land use designation appropriate for this Project and this location of the City generally.

The commenter states: "It is unclear how the city is justifying not providing any alternatives in Section 6 of the EIR that provide an environmental superior alternative that are consistent with a 'Business Park' approval that mitigates the requirement for a less intensive industrial use."

To clarify for the commenter, the purpose of EIR Alternatives Analyses is not to explore every possible development scenario for the Project site as is suggested by the commenter. When an EIR substantiates that a project's impacts are all less-than-significant, CEQA does not require the analysis of alternatives other than the "No Project" alternative. This aligns with the "rule of reason" governing CEQA compliance, which avoids unnecessary analysis when significant impacts are absent.

Consistent with CEQA requirements, the EIR evaluates alternatives to the Project that would lessen its significant environmental effects while allowing for attainment of the basic Project Objectives. It is noted here that the Project *would not result in any significant environmental effects* [emphasis added]. For illustrative purposes only, the EIR includes a "Reduced Intensity Alternative." The EIR also includes a "No Project" analysis as is required under CEQA.

With specific regard to a "Business Park Alternative" as is suggested by the commenter, a Business Park Alternative would not achieve the following Project Primary Objectives:

- Accommodate *light industrial uses* that are compatible with adjacent land uses;
- Provide an attractive, efficient and safe environment for *light industrial uses* that is cognizant of natural and man-made conditions;
- Accommodate *light industrial uses* responsive to current and anticipated market demands. [emphasis added].

Moreover, Business Park uses typically result in a trip generation rate of 1.22 peak hour trips per thousand square feet (TSF). Assuming Business Park development at FAR comparable to the Project<sup>6</sup> this would yield 220,390 s.f. @ 1.22 trips/TSF = 269 peak hour trips (compared to < 100 peak hour trips generated by the Project). On this basis, all traffic related impacts including: mobile-source pollutants generally, localized mobile-source air emissions impacts, traffic congestion/traffic conflicts, mobile-source noise impacts,

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<sup>6</sup>Business Park FAR assumption is conservative. Under a Business Park Land Use, development of the site at FAR up to 1.0 is allowed under the City General Plan. This would yield development of the site with more than 400,000 s.f. of business park uses. Peak hour trips and related impacts under a Business Park Alternative could be approximately double that presented here.



mobile-source GHG emissions, and VMT impacts would all increase rather than decrease under a Business Park Alternative.

Based on the preceding, the Lead Agency has determined that Business Park development of the subject site is not a feasible alternative to the Project that would demonstrably or substantially reduce the Project impacts.

Please refer to EIR Section 5.2, *Alternatives Analysis*. There is no requirement to revise the EIR Alternatives Analysis.

### **Comment SC-6**

#### ***Land Use and Planning***

*Multiple characterizations of consistency with existing land use and planning in Table 4.10-1 are controversial and potentially erroneous.*

- *Conflict with multimodal transportation – this project will add more truck trips entering and existing onto Heacock and Ironwood, both of which are major pedestrian/bike paths. Trucks entering and exiting the facility will cross pedestrian and bike infrastructure causing a safety conflict. Vegetative screens required to screen the project from the are likely to interfere with visibility from tall trucks and courier vehicles for the pedestrians and cyclists approaching the warehouse entrances/exits.*
- *Conflict with traffic – any left-turning trucks will need to cross multiple lanes of traffic. Please require a traffic plan banning all left-turns out of the project from all entrances/exits.*
- *Conflict with communities – Light industrial land use is explicitly described by the City code as incompatible with adjacent residential use. A smoother transition is needed, which means that the Business Park zoning is the appropriate lower intensity option.*
- *Economy – warehouse uses are inherently low density, low quality job uses with anti-union occupants. It is possible to remediate with community benefits agreement mandating local hiring and pay scales.*
- *Larger buildings change the character and nature of an area and, in-and-of-themselves, a significant and unavoidable impact to aesthetics, walkability, and land-use compatibility.*
- *The Festival Specific Plan intended for this project to have a connection point to Davis Street, as shown in the attached document. The Appendix B Amendment to Specific Plan 205*

*amended in 2021 is invalid because it was not supported by adequate environmental documentation by the City of Moreno Valley. The City has not complied with the court order to rescind the invalid 2021 amendments and is instead including them as an attachment in CEQANET (Appendix B) to the project documentation. We ask that all analyses conform to the 2018 valid amendment document (attached).*

### **Response SC-6**

The comment offers opinions on the Project's effects under various topics. The commenter provides no evidentiary support for these statements. The Lead Agency considers the EIR in all instances to provide accurate and adequate information and analyses allowing for informed decisions regarding the Project. Please refer also to Responses AQMD-4, DOT-2, et al. provided herein.

The commenter states that Specific Plan No. 205 (Amended 2021) appended to the EIR (EIR Appendix B) is invalid. The Court found only that the previous MND prepared for the subject site required remedy. The Court did not set aside all previous approvals for Specific Plan No. 205. The EIR responds to the Court order by correcting deficiencies in the previous MND analysis.

Findings and conclusions of the EIR are not affected.

### **Comment SC-7**

#### ***Alternatives Analysis***

*The set of project alternatives considered includes a no build scenario, a commercial build scenario, and a reduced industrial intensity scenario. Air quality, VMT, and GHG emissions from these scenarios were completed 18 months prior to the project NOP date, resulting in inaccurate projections of impacts from these alternatives by Urban Crossroads. This is especially important for the commercial project scenario, which relies on fleet projections prior to adoption of the Advanced Clean Cars II rule in 2023 by CARB which will reduce emissions through more stringent requirements for EV adoption in future years. Therefore, it is imperative that this scenario be reanalyzed using current fleet years and compared to the industrial warehouse alternative which will have no such restrictions because of the withdrawal of CARB's Advanced*

*Clean Fleets rules for trucks. Trucks will therefore be comparatively dirtier in future years.*

*Secondarily, it is important to ensure a reduced intensity alternative that considers the impact of the large building on adjacent aesthetics and property values. A 220,000 square foot warehouse is significantly larger than surrounding residential and office properties. The Business Park zoning is supposed to accommodate a smoother transition and limits industrial property development to 50,000 square foot buildings to reduce these types of impacts. Sierra Club would like to see a Business Park conforming industrial alternative instead of a 160,000 square feet building that looms over adjacent properties.*

### **Response SC-7**

The commenter asserts that EIR Alternatives Analysis would be materially affected by evolution of air quality standards and regulations over the past 4 to 5 years. As discussed in the DEIR and Responses provided herein, all Project air quality impacts would be less-than-significant.

Potential changes in the Commercial development scenario evaluated in the EIR alternatives scenario asserted by the commenter have no bearing on the fact that all Project impacts would be less than significant. Revision to the EIR Alternatives Commercial development scenario would only (at best) reduce the disparity in impacts, with the Commercial use impacts still exceeding those of the Project. Because the Project would not result in any significant impacts, an alternative that would reduce the Project's impacts is not required. A "Business Park Alternative" suggested by the commenter is infeasible – see Response SC-5. Commenter's preference regarding the development of the site is noted.

Findings and conclusions of the EIR are not affected.

### **Comment SC-8**

#### ***Summary***

*Thank you again for the opportunity to provide comments on the draft Environmental Impact Report (EIR) on the Moreno Valley Business Park Building #5 project SCH #202308366. We hope*

*these comments are taken seriously and addressed fully to mitigate the significant unaddressed impacts associated with this project.*

*Please keep the Sierra Club Box Springs Group notified of all documents and meetings related to the project.*

**Response SC-8**

Sierra Club's participation in the Project EIR review process is appreciated. The Lead Agency, however, disagrees with the commenter's assertions regarding the EIR. The Lead Agency considers the EIR to adequately and accurately present the Project's likely maximum environmental impacts. The Moreno Valley Business Park Building 5 Project (Project) EIR is considered adequate, complete, and represents a good faith effort at full disclosure of the Project's potential impacts. As substantiated in the EIR, the Project would not result in any significant environmental effects. Findings and conclusions of the EIR are not affected.

Commenter will be provided notification regarding the Project, EIR, and related meetings.

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***VIA E-MAIL ONLY***

March 3, 2025

City of Moreno Valley  
Attn: Danielle Harper-Scott  
Community Development Department  
[planningnotices@moval.org](mailto:planningnotices@moval.org)

***Re: Public Comments on Draft Environmental Impact Report for Moreno Valley Business Park Project (PEN23-0063, PEN23-0092, PEN23-0042, PEN24-0167)***

To the City of Moreno Valley:

Please accept these comments on behalf of the Sierra Club–San Geronio Chapter regarding the Draft Environmental Impact Report (“EIR” or “Draft EIR”) for the Moreno Valley Business Park Project<sup>1</sup> (PEN23-0063) (“the Project”).

The Project is an application by LCG10MV, LLC for the construction and operation of a 220,390 square foot industrial warehouse building on 9.98 acres at the southwest corner of Heacock Street and Ironwood Avenue. The Project includes a request for a General Plan Amendment redesignating the site from Commercial to Business Park/ Light Industrial as well as a Specific Plan Amendment amending the Moreno Valley Festival Specific Plan (Specific Plan No. 205).

The Project will operate as a logistics warehouse. The “development concept” includes 31 truck dock doors on the Project’s east side. Truck driveways are located on Heacock Avenue and Ironwood Avenue. It is assumed the Project will be operational 24 per days, seven days per week.

For the reasons identified herein, we submit that revisions to the Draft EIR and further mitigation are required in accordance with the California Environmental Quality Act (“CEQA”).

SCA-1

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<sup>1</sup> The Project is sometimes referred to in the record as The District, the Moreno Valley Business Park Building 5 Project, and the Moreno Valley Business Park– Phase II Project.

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### **Project Siting and Design Considerations**

Sierra Club strongly encourages the City to follow the recommendation of the California Air Resources Board (“CARB”) that warehouse land uses should not be located within 1,000 feet of residential uses or areas designated for residential development.<sup>2</sup> According to CARB’s 2022 Scoping Plan p. 184, “[c]ommunities adjacent to congested roadways, including ports and distribution centers, are exposed to the highest concentration of toxic pollutants from vehicles and equipment consuming fossil fuels, leading to a number of demonstrated health impacts such as respiratory illnesses, higher likelihood of cancer development, and premature death.”<sup>3</sup> According to the EIR, some of the closest sensitive receptors to the Project site are:

- 11989 Tabor Drive, approximately 111 feet north of the Project site
- 24130 Ironwood Avenue, approximately 123 feet north of the Project site
- 12107 Heacock Street, approximately 103 feet west of the Project site
- 12065 Heacock Street, approximately 184 feet west of the Project site

SCA-2

The Project will locate a truck-intensive large warehouse building within 200 feet of these and other existing homes.

We further urge the City to consider the Project’s industrial use relative to adjoining sensitive receptors in light of Assembly Bill 98 (full text here<sup>4</sup>). Among other things, this new law may require that loading docks be positioned a certain distance from sensitive receptors (such as homes) as well as the creation of a truck routing plan. All relevant provisions of AB 98 should be considered in the design and implementation of the proposed Project.

### **General Comments Re Project Description and Other Items**

The Project includes a request to amend “the Festival at Moreno Valley Specific Plan”<sup>5</sup> (“Amendment No. 2”). As stated in the Draft EIR, the subject property was excluded from the previously adopted “Amendment No. 1” of the MVF Specific Plan. Also, the subject property is not within the original planning area of the MVF Specific Plan according to the EIR (*see*, Figure 3.3-4). Thus, to the extent the Project’s EIR relies on the previous environmental analyses of the MVF Specific Plan, this is in error. Further, the Project apparently seeks a new zoning designation under the MVF Specific Plan of “Mix of Uses” as part of the Amendment No. 2 application. However, we do not see “Mix of Uses” as a zoning designation under the MVF

SCA-3

<sup>2</sup> [www.arb.ca.gov/ch/handbook.pdf](http://www.arb.ca.gov/ch/handbook.pdf)

<sup>3</sup> <https://www.morenovalleybusiness.com/wp-content/uploads/2021/01/Development-Map-January-2021.pdf>

<sup>4</sup> [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202320240AB98](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB98)

This hyperlink and all links cited in this letter is fully incorporated herein by reference, and its contents summarized in the body of the letter.

<sup>5</sup> The January 19, 2021 Amendment to Specific Plan 205 (Draft EIR, Appendix B) states that this plan should be called the “Moreno Valley Festival (MVF)” Specific Plan, rather than the “Festival at Moreno Valley” Specific Plan as stated in the EIR and elsewhere.



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Specific Plan -- the Project would appear to need a rezone to “Light Industrial” or perhaps “Business Park” but not “Mix of Uses.”

SCA-3  
(cont'd)

The City must condition the Project consistent with the assumptions of the EIR’s analyses of various environmental issue areas. For example, the Draft EIR states “it is anticipated that 90 percent of Project traffic would access the Project site via the Project’s Heacock Street driveways(s); and approximately 10 percent of the Project traffic would access the Project site via the Project’s Ironwood driveway.” This must be made a condition of the Project’s approval; otherwise, traffic and noise impacts could be much worse than assumed by the EIR. As the Ironwood Driveway is designed to enable trucks to use it (40-ft wide), there is nothing preventing trucks from utilizing this driveway. Similarly, the assumption of the EIR that “trucks accessing the Project site would travel along designated truck routes,” is not supported by mandatory conditions or mitigation measures that would ensure that trucks do not use non-truck routes. If trucks use non-truck routes, traffic noise impacts could be more intense.

SCA-4

The majority of the “technical studies” supporting the EIR were prepared in January 2022 prior to the Notice of Preparation of EIR (*i.e.*, the VMT Analysis; Air Quality Impact Analysis; Health Risk Assessment; Greenhouse Gas Emission Analysis; Energy Assessment; and Noise Impact Analysis). The “Transportation Analysis Scoping Agreement” was prepared in June 2020. These studies do not adequately describe or evaluate current environmental conditions. For instance, the Air Quality Analysis states that construction is anticipated to begin in August 2022. This comment also applies to the 2021 biological assessment which in part is based on a “MSHCP Consistency Report” from 2015.

SCA-5

On the City’s website, the electronic links to several of the technical appendices do not match their descriptions (*e.g.*, Appendix G is described as the Noise Impact Analysis but it is a link to a soils report; and Appendix I, “Geotech”, is a link to the November 2021 MSHCP Consistency Analysis Report).

The Project Description section of the EIR does not disclose that “vicinity land uses” include residences to the west of the site across Heacock Street. The EIR’s Figure 3.3-1 describes the properties to the west as “commercial/service uses” when, in fact, a number of these properties labeled as “commercial” are single family residences. Surrounding uses include single family homes located within 150 feet of the Project site. Surrounding zoning should also be described as including residential zoning to the north across Ironwood Avenue.

SCA-6

The EIR states that “the Project” described and evaluated through the EIR is a “Project Site Plan Concept”. The EIR states that “final designs of all Project elements will be realized consistent with design requirements and standards identified within the Specific Plan No. 205 Amendment No. 2 document.”. There is no technical “site plan” in the EIR indicating important Project elements such as parking, circulation, fire lanes, fencing, etc. The EIR must attempt to describe as much as possible about the Project’s design and operation to ensure that potential

SCA-7

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impacts are fully assessed and disclosed through the EIR. Also, the Energy Efficiency/Sustainability features listed in the EIR's section 3.4.10 are not requirements of the Project; there is no guarantee they are carried forward to any "final" Project Plans. Furthermore, Appendix B referred to as "Amendment No. 2" to the EIR on the City's planning website is the "Amendment to Specific Plan 205" dated February 21, 2021. This document (Appendix B) does not include the proposed Project and is not updated to reflect the proposed industrial use. We could not locate a document entitled "Amendment No. 2" (to the Festival Specific Plan/MVF) with the EIR documents available online.

We observe that the Project's design, particularly circulation elements such points of ingress and egress (driveways) appears inconsistent with the "MVF" Specific Plan document (See, Draft EIR, Appendix B, p. 57). This figure shows a "major entry" point on Heacock Street with a "minor entry" point at Davis Street, *not* the two truck driveways indicated on the Project rendering in the EIR. MVF Specific Plan Section 5.2.3 states that all properties within the "MVF" shall be developed in conformance with the Specific Plan. Similarly, the Project must be conditioned to be 55 feet in height consistent with the Building Height provisions of the "MVF" Specific Plan (Appendix B, p. 63). The Project should likewise follow the Business Park Design Standards listed in the "MVF" Specific Plan, including that "a variety of building sizes and setbacks should be provided in order to avoid long monotonous building facades and to create diversity." The "MVF" Specific Plan indicates that "along the Ironwood Avenue and Heacock Street boundary, 8' high solid fencing shall be used to restrict access and view to the residential areas and provide a sound buffer from traffic noise." We do not see that a solid wall along Ironwood and Heacock Avenue is part of the Project's design (from the available rendering in the EIR). These and other design elements from the MVF Specific Plan must be carried over to the Project's design to ensure consistency with the applicable land use plan.

SCA-7  
(cont'd)

### **Air Quality**

All on-site cargo handling equipment should be zero emission/electric *only*. The Draft EIR describes that cargo handling equipment will be "non-diesel (e.g., gasoline and/or electric powered)." (p. 1-15). At the least, this description should be clarified.

The Project must be conditioned in the manner assumed by the EIR with respect to cold storage. The EIR assumes that a "maximum of 15 percent of Project gross floor area (33,060) will comprise refrigerated warehouse uses." (p. 1-15) If the Project is not conditioned in a manner that is consistent with the EIR's air quality analysis, the impacts of the Project could be much worse in practice.

SCA-8

In terms of the Project's consistency with the South Coast Air Quality Management District's Air Quality Management Plan (AQMP), an adopted threshold of significance for air quality impacts, the EIR purports to consider the Project's consistency with the 1993 AQMP (and it loosely references the 2016 AQMP and a "2011" AQMP in various places). It is unclear



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what version of the AQMP that the EIR is relying upon to evaluate Project impacts. Importantly, the AQMP was updated in 2022.<sup>6</sup> The Project's consistency with the AQMP must be evaluated pursuant to the extant AQMP, not previous versions that did not encompass current air quality conditions and relevant regulations. For instance, the South Coast AQMD's webpage states that the AQMP was updated to address the EPA's most recent requirements for meeting primary and secondary ozone standards.<sup>7</sup>

The 2022 AQMP is being developed to identify and implement strategies and control measures to meet the 2015 8-hour ozone NAAQS (70 ppb) as expeditiously as practicable, but no later than the statutory attainment deadline of August 3, 2038 for South Coast Air Basin and August 3, 2033 for the Coachella Valley. The 2022 AQMP is based on the most recent assumptions provided by both CARB and SCAG for motor vehicle emissions and demographic updates and includes updated transportation conformity budgets. (p. 1-14)

SCA-8  
(cont'd)

The EIR's failure to evaluate Project consistency with the extant AQMP must be corrected. The EIR concludes that the Project is consistent with the 1993 AQMP because it will not cause air quality violations or delay timely attainment of air quality standards specified "in the AQMP." The *current* AQMP has updated air quality standards that have been overlooked here.

Further under Criterion No. 2, the Project is not shown to be consistent with the AQMP since "the AQMP" is based on the land use assumptions of the City of Moreno Valley's General Plan in place at the time of the adoption of the AQMP. As the EIR acknowledges, the site's land use designation under the 2006 General Plan is "Commercial". Since the Project seeks a land use amendment, the proposed use is *not* consistent with the land use assumptions of the AQMP, and therefore consistent with the AQMP's assumptions about attainment of air quality standards. The proposed land use amendment does not address this inconsistency which is again based on the land use designations in place at the time of the AQMP's adoption.

The City does not appear to have required a "study" with respect to the roadway segment of Heacock Street between Manzanita Avenue to SR-60 as set forth in General Plan mitigation measure AQ10.<sup>8</sup> This roadway segment includes the Project's location (*i.e.*, the segment of Ironwood to SR 60 is within the roadway of Manzanita Avenue to SR 60). Similarly General Plan, Policy 9.5.3, Section 5-6, requires that the City conduct studies of "specified segments to determine if additional improvements will be needed to maintain acceptable LOS at General Plan buildout. Generally, these segments will be studied as new developments are proposed in their

SCA-9

<sup>6</sup> <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>

<sup>7</sup> <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan>

<sup>8</sup> [https://moval.gov/city\\_hall/general-plan/06gpfinal/ieir/2-execsum.pdf](https://moval.gov/city_hall/general-plan/06gpfinal/ieir/2-execsum.pdf)

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vicinity.”<sup>9</sup> In short, General Plan policies relating to mitigation of air quality impacts do not appear to have been followed or required in this case.

SCA-9  
 (cont'd)

### **Cumulative Air Quality Impacts**

CEQA defines a “cumulative impact” as one that *may be individually limited* but cumulatively considerable when considered with past, present, and foreseeable future projects. (State CEQA Guidelines, §§ 15130 (a), 15355 (b).) The City must evaluate the Project’s potential for significant cumulative air quality impacts, particularly the EIR must examine the Project’s NOx impacts (truck diesel emissions) in combination with other cumulative industrial projects in proximity of the proposed Project.

A billion square feet of industrial warehousing has been constructed in the Inland Empire in the last ten years or so.<sup>10</sup> Approximately 400 million square feet of industrial development has been approved or is in process of approval in Riverside County.<sup>11</sup> At a local level, the City has approved or is considering the approval of at least the following warehouse projects in the last 10-15 years:

- March Business Center (2009) – General Plan Amendment allowing **1,484,407** square feet of industrial warehouse space on 66.9-acres
- Master Plot Plan PA07-0035 (2010) - **409,598** square foot industrial warehouse building space
- West Ridge Commerce Center (2011) - **937,260** square foot warehouse distribution building
- VIP Moreno Valley Project (2012) - **1,616,133** square foot warehouse space
- First Inland Logistics Center II Project (2013) - **400,130** square feet warehouse space
- First Nandina Logistics Center Project (2014) - **1,450,000** square feet warehouse space
- Prologis Eucalyptus Industrial Park Project (2015) - **2,244,419** square feet of warehouse uses including a General Plan Amendment from residential to Light Industrial
- World Logistics Center (2015) - **40.6 million** square feet of warehouse logistics development on 3,918 acres in eastern Moreno Valley
- Indian Street Commerce Center Project (2016) - **446,350** square feet of warehouse space
- Moreno Valley Logistics Center (2016) - **1,736,180** total square feet of warehouse space<sup>12</sup>

SCA-10

<sup>9</sup> [https://moval.gov/city\\_hall/general-plan/06gpfinal/gp/9-goals.pdf](https://moval.gov/city_hall/general-plan/06gpfinal/gp/9-goals.pdf)

<sup>10</sup> <https://timesofsandiego.com/business/2023/01/28/southern-california-warehouse-boom-poses-environmental-costs-for-the-inland-empire/>

<sup>11</sup> <https://radicalresearch.shinyapps.io/WarehouseCITY/>

<sup>12</sup> <http://www.moreno-valley.ca.us/cdd/pdfs/projects/mv-logistics/draft-eir.pdf>



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- Brodiaea Commerce Center (2017) - **262,398** square foot warehouse including a rezone from Business Park-Mixed Use to “Light Industrial”
- Moreno Valley Business Park (2021) - **220,390** square feet of warehouse logistics development including a General Plan Amendment to from commercial to light industrial
- Compass Danbe Centerpointe (2021) –approval for a **General Plan Amendment** to allow the development of two light industrial buildings of **389,603** square feet
- Moreno Valley Business Center (2023) – approval for **164,187** square feet of industrial warehouse development
- Heacock Commerce Center – pending application for a **General Plan Amendment** and Change of Zone for two high cube industrial buildings totaling **873,967** square feet
- Edgemont Commerce Center – pending application for the development of a **142,325-** square foot commerce center project with **Change of Zone** to allow a warehouse greater than 50,000 square feet.

The failure here to consider the proposed Project’s cumulative air quality impacts cannot be rationalized in light of the vast amount of industrial development proposed and approved in the City. Moreover, the 2006 General Plan did not, and could not have, considered or mitigated the extent of the City’s industrial development particularly the 40-million square foot World Logistics Center Project proposed in or about 2015. A cumulative air quality analysis is particularly relevant given the warehouse projects to the immediate south and east of the Project site. Together, these projects will have air quality, traffic, and noise impacts that must be considered.

The EIR concludes there is no need for a cumulative air quality impact analysis in part because it asserts that project-specific air quality impacts are less than significant. As authority, the EIR cites an appendix to a 2003 white paper issued by the South Coast AQMD, which is selectively quoted and misapplied. The generalized discussion concerns South Coast AQMD’s approach to cumulative impact analysis when it is the Lead Agency for a project, which it is not here.<sup>13 14</sup> Moreover, this 20-year-old appendix states that AQMD does not “generally” consider projects to have cumulative impacts when those projects do not exceed project-specific thresholds. Here, however, the EIR intentionally ignores the reality of hundreds of thousands of square feet of warehouses being built and approved in Moreno Valley, particularly in the immediate vicinity of the proposed Project. Environmental agencies continue to study, document and recognize the adverse health effects of poor air quality conditions especially with respect to children<sup>15</sup>. In fact, the South Coast AQMD is in the process of updating its “guidance

SCA-10  
(cont’d)

<sup>13</sup> <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>

<sup>14</sup> <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf>

<sup>15</sup> <https://oehha.ca.gov/media/downloads/calenviroscreen/report/cireport123110.pdf>

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documents” in terms of cumulative impact analysis, while recognizing that cumulative air quality analysis *is* a requirement of CEQA.<sup>16 17 18 19</sup>

SCA-10  
(cont'd)

### **Biology**

The Draft EIR states that the Project would have a less-than-significant biological impact because it would comply with the Western Riverside MSHCP (Draft EIR section 1.9.4) based on a 2021 MSHCP survey. Sierra Club submits that this biological survey must be updated.

The MSHCP survey (2021) states that “the only MSHCP survey requirements were for burrowing owl. Focused burrowing owl surveys were conducted in 2015 and no burrowing owl was detected.” This is inadequate. A purported survey conducted ten years ago is not adequate for determining the level of potential impact to a protected species. Furthermore, the 2015 study is apparently not part of the record so that it can be reviewed for compliance with standard protocols. (See, Survey and Monitoring Protocols and Guidelines from California Department of Fish and Wildlife<sup>20</sup>; *see also*,<sup>21</sup>). The MSHCP requires a habitat assessment for burrowing owl following specific protocol. *See*,<sup>22</sup> If any potential habitat is present, a focused burrowing owl is required. This information is paramount given that the western Burrowing Owl has recently been made a candidate for listing under the California Endangered Species Act (CESA).<sup>23 24</sup>

SCA-11

Additionally, the Department of Fish and Wildlife has permitting requirements for the take of lake or streams. Riparian habitat is also protected under the Western Riverside MSHCP. Projects that impact riparian habitat must comply with Section 6.1.2 of the MSHCP.<sup>25</sup> The EIR improperly concludes that impacts are less than significant despite the Project permanently impacting a riparian area in the northern portion of the site without any mitigation for the loss of this resources. Since the Project will impact a documented riparian area, the EIR should conclude the Project has the potential for a “substantial adverse effect on riparian habitat ... identified in ... plans ... by the California Department of Fish and Wildlife (CDFW)” (*see*, EIR’s threshold

<sup>16</sup> [http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-\(new\)](http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new))

<sup>17</sup> [http://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-1-presentation\\_02172022\\_final.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-1-presentation_02172022_final.pdf?sfvrsn=6)

<sup>18</sup> [http://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-3\\_20230124.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-3_20230124.pdf?sfvrsn=6)

<sup>19</sup> [http://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-4\\_20230602\\_final.pdf?sfvrsn=10](http://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-4_20230602_final.pdf?sfvrsn=10)

<sup>20</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>

<sup>21</sup> [https://www.wrc-rca.org/species/survey\\_protocols/burrowing\\_owl\\_survey\\_instructions.pdf](https://www.wrc-rca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf)

<sup>22</sup> [https://www.wrc-rca.org/species/survey\\_protocols/burrowing\\_owl\\_survey\\_instructions.pdf](https://www.wrc-rca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf)

<sup>23</sup> <https://wildlife.ca.gov/News/Archive/fish-and-game-commission-western-burrowing-owl-becomes-cesa-candidate-wildlife-prosecutor-of-the-year-named-waterfowlers-hall-of-fame-inductees-recognized#:~:text=The%20Commission%20unanimously%20approved%20naming.to%20protect%20California's%20natural%20resources.>

<sup>24</sup> <https://biologicaldiversity.org/w/news/press-releases/california-burrowing-owls-one-step-closer-to-state-protections-2024-10-10/>

<sup>25</sup> [https://www.wrc-rca.org/wp-content/uploads/2022/06/Section6\\_1\\_2\\_Riparian\\_Riverine\\_Functions\\_and\\_Values\\_Factors\\_List\\_FINAL\\_20220620.pdf](https://www.wrc-rca.org/wp-content/uploads/2022/06/Section6_1_2_Riparian_Riverine_Functions_and_Values_Factors_List_FINAL_20220620.pdf)

[https://www.wrc-rca.org/wp-content/uploads/2022/06/Section6\\_1\\_2\\_Riparian\\_Riverine\\_Functions\\_and\\_Values\\_Factors\\_List\\_FINAL\\_20220620.pdf](https://www.wrc-rca.org/wp-content/uploads/2022/06/Section6_1_2_Riparian_Riverine_Functions_and_Values_Factors_List_FINAL_20220620.pdf)



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of significance for biological impacts). The City's 2006 General Plan states that build out of the General Plan will cause the replacement of riparian vegetation along drainage ways and natural drainage courses with man-made features. The General Plan's mitigation program Section 5.9 B3 thus states that, "where feasible, projects shall be designed to minimize impacts on sensitive habitat."<sup>26</sup> The General Plan's Policy 7.4.1 states that the City shall "require all development ... proposed adjacent to riparian resources ... to provide adequate buffers to mitigate impacts to such areas."<sup>27</sup> We submit that mitigation is required in this case.

SCA-11  
 (cont'd)

### **Hydrology and Water Quality**

The EIR lacks a hydrology or water quality study. The EIR summarily states that a future water quality management plant (WQMP) will be prepared prior to issuance of grading permits. This is inadequate under CEQA. CEQA requires the preparation of relevant studies prior to the approval of the proposed activity that may result in environmental harm. This is particularly inadequate where the purported "MSHCP survey" notes that an "ephemeral channel crossed the northern portion of the site" (*see*, MSHCP survey Section 1.0).

SCA-12

### **Energy**

The Energy Analysis is based on assumptions about the operation of the Project site to include the assumption that 15% of the Project building will be used for "high cube cold storage.". As can be seen from Energy Analysis Table 7, cold storage uses are estimated to require a far greater amount of energy than typical "warehousing" uses. For this reason, the Project must be conditioned to allow for *only* 15% of cold storage uses in accordance with the assumptions of the EIR.

The Project will result in the consumption of 2,071,348 kW h of electricity per year (Table 7), and it will consume 192,858 gallons of fuel annually. The Draft EIR concludes the Project will not result in energy usage impacts and no mitigation is proposed. This conclusion is unsupported by the record.

SCA-13

State CEQA Guidelines Appendix F provides that "[t]he goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption; (2) *decreasing* reliance on fossil fuels such as coal, natural gas and oil, and (3) *increasing* reliance on renewable energy sources." (emphasis added) Guidelines Appendix F puts "particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." The conclusions of the EIR's energy analysis are unsupported by evidence where the Project does not adopt any measures

<sup>26</sup> [https://moval.gov/city\\_hall/general-plan/06gpfinal/ieir/2-execsum.pdf](https://moval.gov/city_hall/general-plan/06gpfinal/ieir/2-execsum.pdf)

<sup>27</sup> [https://moval.gov/city\\_hall/general-plan/06gpfinal/gp/9-goals.pdf](https://moval.gov/city_hall/general-plan/06gpfinal/gp/9-goals.pdf)

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to reduce fuel consumption or incorporate sustainability building practices beyond those required by the current Building Code (Title 24/Cal Green).

Fuel consumption can be reduced, for example, by utilizing zero emission delivery vehicles. The Project should establish fleet efficiency requirements for vehicle fleets. This should include, at a minimum, requirements that industrial tenants shall use exclusively zero emission light and medium-duty delivery trucks and vans; shall use only zero emission service equipment such as forklifts and yard trucks (electric only/no natural gas); and shall use near-zero and zero-emission technologies in heavy-duty applications such as “last mile delivery.”<sup>28</sup> As the State moves toward its goal of zero emission goods movement, the City must ensure that the Project is in line with this important objective by also requiring the *phase-in* of zero emission or clean technology for *heavy duty* trucks. According to CARB, actions to deploy both zero emission and cleaner combustion technologies will be essential to meet air quality goals in California particularly with respect to goods movement.<sup>29</sup> Additional, feasible mitigation for operational air quality impacts includes the phase-in of electric, hybrid electric, hydrogen electric, or battery operated (*i.e.*, non-diesel) trucks. The Project should be conditioned to adopt a “Diesel Minimization Plan” whereby zero emission trucks are phased in, *e.g.*, 25% of truck fleets shall use zero emission technology by 2030, and increase that percentage by 10% per year, until 100% of trucks operating on sites are zero emission. This approach to mitigation is consistent with California regulations regarding phase-in of electric vehicles.<sup>30</sup> (California requiring manufacturers to produce zero emission trucks beginning in 2024); *see also* (discussing CARB’s Advanced Clean Truck Rule)<sup>31 32</sup>.) A mitigation measure is feasible if it can be achieved in a reasonable period of time. (Guidelines, § 15364.) The California Attorney General has recommended the adoption of zero emission truck mitigation. (*See* <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf> [“requir[e] all heavy duty vehicles entering or operated on the project site to be zero-emission beginning in 2030”.].)

SCA-13  
 (cont'd)

The City should also impose measures on the Project to promote building sustainability and ensure compliance with Guidelines, Appendix F and to advance the policies and goals of Senate Bill 100 which commits to 100% clean energy in California by 2045.<sup>33</sup> Requiring the Project to utilize solar energy is one feasible means to ensure that the State can meet its laudable energy efficiency goals. In a footnote, the Draft EIR states that the Project building “roof designs” would be required to provide for “solar zones” that are reserved for the future installation of a solar electric or solar thermal system. The Project should be conditioned to

<sup>28</sup> <https://www.nbcnews.com/tech/tech-news/treated-sacrifices-families-breathe-toxic-fumes-california-s-warehouse-hub-n1265420>

<sup>29</sup> <https://ww3.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf>

<sup>30</sup> <https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035>

<sup>31</sup> <https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet>

<sup>32</sup> <https://www.cnbc.com/2023/03/31/california-requires-half-of-heavy-trucks-sales-to-be-electric-by-2035.html#:~:text=The%20state%27s%20rule%20requires%20manufacturers,on%20the%20road%20by%202035.>

<sup>33</sup> <https://www.energy.ca.gov/sb100>



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require the *installation of a solar energy system* at the time of building construction, which is a feasible measure. City General Plan Policy 7.5.5 states the City will “encourage the use of solar power and other renewable energy systems.”<sup>34</sup> Requiring “LEED” certification is another means to promote sustainability.<sup>35</sup> The City’s 2006 General Plan Conservation Element<sup>36</sup> states that “the City recognizes the need to reduce energy use and greenhouse gas emissions and become a more sustainable community.” (Chapter 7, Section 7.6.3) Measures should be imposed consistent with this policy.

SCA-13  
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### **Greenhouse Gas Emissions**

The State of California has committed to aggressive goals for the reduction of the emissions causing global climate change. Assembly Bill 1279 requires the state to achieve net zero greenhouse gas emissions (GHG) as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter. The bill requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels no later than 2045. Yet the Draft EIR does not discuss specific goals or strategies of the California Air Resources Board (“CARB”) 2022 Scoping Plan for Achieving Carbon Neutrality (“2022 Scoping Plan”).<sup>37</sup> <sup>38</sup> The 2022 Scoping Plan is designed to achieve the emission reduction requirements of AB 1279. The Draft EIR must be revised with analysis that demonstrates Project consistency with the Scoping Plan strategies.<sup>39</sup>

Also, the Draft EIR does not demonstrate the Project’s consistency with the policies of the 2020-2025 RTP/SCS. The Project conflicts with many “SCAG goals” including those aimed at reducing GHGs and improving air quality as well as those aimed at decreasing VMT.<sup>40</sup> <sup>41</sup>

SCA-14

The Draft EIR likewise ignores feasible measures from the California Air Pollution Control Officers Association’s Handbook for *Analyzing Greenhouse Gas Emission Reductions, et al.*<sup>42</sup>, including,

- T-7 “Provide Ridesharing Program” including providing an app or website for coordinating rides among employees.
- T-8 “Implement Subsidized or Discounted Transit Program” where the employer provides subsidies for employees to use public transit.

<sup>34</sup> [https://moval.gov/city\\_hall/general-plan/06gpfinal/gp/9-goals.pdf](https://moval.gov/city_hall/general-plan/06gpfinal/gp/9-goals.pdf)

<sup>35</sup> <https://www.usgbc.org/leed>

<sup>36</sup> [https://moval.gov/city\\_hall/general-plan/06gpfinal/gp/7-conserv.pdf](https://moval.gov/city_hall/general-plan/06gpfinal/gp/7-conserv.pdf)

<sup>37</sup> <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>

<sup>38</sup> <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp-es.pdf>

<sup>39</sup> <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf>

<sup>40</sup> <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-ch-03-our-plan-040424.pdf?1712261395>

<sup>41</sup> [https://www.icpds.com/assets/SCAG\\_2020-1642792556.pdf](https://www.icpds.com/assets/SCAG_2020-1642792556.pdf)

<sup>42</sup> [https://www.airquality.org/ClimateChange/Documents/Handbook%20Public%20Draft\\_2021-Aug.pdf](https://www.airquality.org/ClimateChange/Documents/Handbook%20Public%20Draft_2021-Aug.pdf)

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- T-9 “End-of-Trip Bicycle Facilities” that includes bike parking, showers, and personal lockers.
- T-10 “Provide Employer-Sponsored Vanpool” that provides groups of 5 to 15 employees with a cost-effective and convenient rideshare option for commuting.
- T-13 “Provide Electric Vehicle Charging Infrastructure” that provides EV charging stations *beyond* what is required by CalGreen/Title 24.
- T-17 “Provide Pedestrian Network Improvement” that increases sidewalk coverage.
- T-18-A “Construct or Improve Bike Facility” that constructs or improves a single bicycle facility that connects to a larger bicycle network.
- T-19 “Expand Bikeway Network” that would increase the length of the City’s bikeway network.
- T-24 “Expand Transit Network Coverage” to expand the local transit network by adding or modifying existing transit service.

SCA-14  
(cont'd)

### **Land Use**

The Draft EIR ignores relevant policies of the City’s 2006 General Plan as well as the pending 2024 General Plan Update including the Environmental Justice Element,<sup>43</sup> the Noise Element<sup>44</sup>, and Land Use Element<sup>45</sup>. The City has issued a Notice of Preparation for a revised EIR for the General Plan 2040. The City should consider the policies of the pending 2040 General Plan insofar as the pending policies are relevant to the Project. In addition, the EIR must consider measures consistent with the 2040 General Plan’s Climate Action Plan which is also pending before the City.<sup>46</sup>

SCA-15

### **Noise**

The EIR’s noise analysis does not describe or evaluate the cold storage uses that are described as part of the Project. The analysis describes the operation of “roof top air conditioning units” for a traditional warehouse operation. Cold storage utilizes cooling systems (condensers and compressors) to continuously maintain refrigerated temperatures.<sup>47</sup> The noise analysis must be revised to include *all* the equipment that is anticipated during Project operations. Further, all operational activities must be described including truck movements, parking lot activities, trash compactors and all rooftop mechanical equipment.

SCA-16

<sup>43</sup> [https://moval.gov/city\\_hall/general-plan2040/08-EnvironmentalJustice.pdf](https://moval.gov/city_hall/general-plan2040/08-EnvironmentalJustice.pdf)

<sup>44</sup> [https://moval.gov/city\\_hall/general-plan2040/07-Noise.pdf](https://moval.gov/city_hall/general-plan2040/07-Noise.pdf)

<sup>45</sup> [https://moval.gov/city\\_hall/general-plan2040/02-LandUse.pdf](https://moval.gov/city_hall/general-plan2040/02-LandUse.pdf)

<sup>46</sup> [https://moval.gov/city\\_hall/general-plan2040/MV-CAP.pdf](https://moval.gov/city_hall/general-plan2040/MV-CAP.pdf)

<sup>47</sup> <https://www.inboundlogistics.com/articles/cold-storage-warehouse/#:~:text=Cold%20storage%20warehouses%20require%20a,spoilage%20and%20substantial%20financial%20losses.>



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Furthermore, the EIR's noise analysis, Table 7-6, indicates significant operational noise impacts during nighttime hours. For instance, the combined project and ambient noise levels at R1, R2, R4, R5, and R6 are all above the City's nighttime residential noise standard of 55 dBA. This is a potentially significant impact under Significance Criteria A.

SCA-16  
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### **Transportation**

We submit that a transportation impact analysis ("TIA") should be required for the Project based on the City's Traffic Impact Preparation Guide (June 2020)<sup>48</sup> which states that:

Truck intensive uses. In addition to the standard TIA requirements, or if the standard TIA requirements are waived, projects that are "truck intensive" may be required to submit a study addressing the truck access routes (as defined in the Municipal Code Section 12.36.010), adequacy of the existing streets to be used (in terms of geometry and structural section), safety issues relating to the truck traffic, and the impacts of the truck traffic on existing residences and/or businesses. Truck traffic shall be evaluated utilizing PCEs. This information shall be provided in the Scoping Agreement.

SCA-17

Furthermore, per the City's guidelines, a Level of Service analysis is arguably required. The Traffic Impact Preparation Guide (June 2020) states,

Development proposals that also include a General Plan Amendment, Specific Plan, Zone Change or other approval that increases traffic beyond what was approved in the General Plan will also be required to perform a General Plan Buildout analysis to assess long term impacts. This analysis will determine if the Circulation Element of the General Plan is adequate to accommodate projected traffic at the required LOS, or if additional mitigation is necessary.

### **Project Alternatives**

CEQA requires that an EIR describe "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project." (Guidelines, § 15126.6 (a).) The Draft EIR should evaluate a development alternative with a greater mix of uses, such as business park or professional park uses consistent with the development patterns contemplated by the MVF Specific Plan (*i.e.*, "mixed use"). The City

SCA-18

<sup>48</sup> <https://www.moval.org/departments/public-works/transportation/TIA-Guidelines.pdf>

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should explore a development that truly balances uses to create the type of “infill” or “transit oriented” development consistent with the Specific Plan to which the Project will become a part.

To ensure that alternatives are properly assessed and considered, CEQA “contains a ‘substantive mandate’ requiring public agencies to refrain from approving projects with significant environmental effects if ‘there are feasible alternatives or mitigation measures’ that can substantially lessen or avoid those effects’.” (*County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4<sup>th</sup> 86, 98; Pub. Res. Code § 21002.) A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. (Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092.) Rejected alternatives must be “truly infeasible.” (*County of Marina v. Bd of Trustees of Calif. State Univ.* (2006) 39 Cal.4<sup>th</sup> 341, 369.) Absent findings of infeasibility supported by substantial evidence, the City here must adopt the environmentally superior alternative.

SCA-18  
 (cont'd)

#### **Notification of Resource Agencies**

Given the potential for biological, hydrological, and other impacts we believe it is imperative that the City provide notice of the EIR to agencies with jurisdiction over resources that may be impacted by the Project.

SCA-19

#### **Conclusion**

Thank you for your consideration of these comments and for including my office on the noticing list for future CEQA and public hearing notices related to the Project.

SCA-20

Sincerely,



Abigail Smith

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Letter (submitted via email) dated March 3, 2025

**Comment SCA-1**

*Please accept these comments on behalf of the Sierra Club–San Gorgonio Chapter regarding the Draft Environmental Impact Report (“EIR” or “Draft EIR”) for the Moreno Valley Business Park Project1 (PEN23-0063) (“the Project”).*

*The Project is an application by LCG10MV, LLC for the construction and operation of a 220,390 square foot industrial warehouse building on 9.98 acres at the southwest corner of Heacock Street and Ironwood Avenue. The Project includes a request for a General Plan Amendment redesignating the site from Commercial to Business Park/ Light Industrial as well as a Specific Plan Amendment amending the Moreno Valley Festival Specific Plan (Specific Plan No. 205).*

*The Project will operate as a logistics warehouse. The “development concept” includes 31 truck dock doors on the Project’s east side. Truck driveways are located on Heacock Avenue and Ironwood Avenue. It is assumed the Project will be operational 24 per days, seven days per week.*

*For the reasons identified herein, we submit that revisions to the Draft EIR and further mitigation are required in accordance with the California Environmental Quality Act (“CEQA”).*

**Response SCA-1**

The City of Moreno Valley (Lead Agency) appreciates Sierra Club–San Gorgonio Chapter participation in the Project CEQA review process. Responses to Sierra Club–San Gorgonio Chapter comments are provided herein.

The commenter notes the Project Applicant (Applicant) and provides a summary description of the Project. Applicant information and Project description as summarized

by the commenter are materially correct. Detailed Project information is presented in Draft EIR Section 3.0, *Project Description*.

**General Response:** Disagreement among experts does not make an EIR inadequate.

CEQA Guidelines Section 15151. *Standards for Adequacy of an EIR*, provides the following:

“An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. *Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*”

In this regard, and despite disagreement expressed by the commenter, all analyses prepared as components of the Moreno Valley Business Park Building 5 Project (Project) EIR are considered adequate, complete, and represent a good faith effort at full disclosure of the Project’s potential impacts.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-2**

#### *Project Siting and Design Considerations*

*Sierra Club strongly encourages the City to follow the recommendation of the California Air Resources Board (“CARB”) that warehouse land uses should not be located within 1,000 feet of residential uses or areas designated for residential development. According to CARB’s 2022 Scoping Plan p. 184, “[c]ommunities adjacent to congested roadways, including ports and distribution centers, are exposed to the highest concentration of toxic pollutants from vehicles and equipment consuming fossil fuels, leading to a number of demonstrated health impacts such as*

*respiratory illnesses, higher likelihood of cancer development, and premature death.” According to the EIR, some of the closest sensitive receptors to the Project site are:*

- 11989 Tabor Drive, approximately 111 feet north of the Project site*
- 24130 Ironwood Avenue, approximately 123 feet north of the Project site*
- 12107 Heacock Street, approximately 103 feet west of the Project site*
- 12065 Heacock Street, approximately 184 feet west of the Project site*

*The Project will locate a truck-intensive large warehouse building within 200 feet of these and other existing homes.*

*We further urge the City to consider the Project’s industrial use relative to adjoining sensitive receptors in light of Assembly Bill 98 (full text here). Among other things, this new law may require that loading docks be positioned a certain distance from sensitive receptors (such as homes) as well as the creation of a truck routing plan. All relevant provisions of AB 98 should be considered in the design and implementation of the proposed Project.*

## **Response SCA-2**

The commenter notes CARB recommendations and AB 98 provisions regarding design and siting of warehouse land uses. Consistent with the intent and purpose of the CARB Scoping Plan and AB 98<sup>7</sup> already established Lead Agency policies and requirements address potentially significant impacts that may result from the proximate collocation of warehouse and residential land uses. The Lead Agency planning and development processes globally promote separation of disparate land uses to the extent practical - thereby avoiding or reducing land use conflicts and related environmental impacts. The Lead Agency specifically requires warehouse development projects to include physical and operational measures to reduce potentially significant impacts, especially as these impacts may affect area residential land uses or other sensitive receptors.

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<sup>7</sup> The EIR NOP, published on 08/17/2023, predates AB 98 (signed into law 09/29/24; statewide requirements effective January 1, 2026). Under CEQA, the NOP date generally fixes the baseline conditions to be considered in the EIR, including laws and regulations effective at the time the EIR is prepared. The City’s established CEQA and design and development review processes effect compliance with applicable provisions of laws and regulations as they come in to effect including AB 98.

The commenter mischaracterizes the Project as a “truck-intensive large warehouse building” implying that the Project truck traffic would somehow result in significant environmental impacts. Note first that under AB 98, the Project (at less than 250,000 square feet) is considered a smaller warehouse use. “Truck-intensive” is not a CEQA metric or standard. The term “truck-intensive uses” as employed in the City of Moreno Valley *Transportation Impact Analysis Preparation Guide* (TIA Guidelines) is as follows:

**Truck intensive uses.** In addition to the standard TIA requirements, or if the standard TIA requirements are waived, projects that are “truck intensive” may be required to submit a study addressing the truck access routes (as defined in the Municipal Code Section 12.36.010), adequacy of the existing streets to be used (in terms of geometry and structural section), safety issues relating to the truck traffic, and the impacts of the truck traffic on existing residences and/or businesses. Truck traffic shall be evaluated utilizing PCEs. This information shall be provided in the Scoping Agreement (TIA Guidelines, p. 4).

Per the City TIA Guidelines, Project truck traffic has been evaluated employing Passenger Car Equivalents (PCEs). As substantiated at DEIR Appendix C: Transportation Analysis Scoping Agreement, the Project would generate fewer than 100 peak hour trips (both actual vehicles and PCE). On this basis, the Project was scoped out from further traffic analysis.

Project truck traffic would access the Project site via designated truck routes. These truck routes are designed to accept and convey truck traffic such as would be generated by the Project. The Project does not propose or require street or intersection geometries that would result in hazardous or unsafe conditions. The DEIR and Responses provided herein substantiate that Project truck traffic would not adversely affect area residences or businesses. Please refer to the DEIR pp. 1-7, 1-14, 3-14, 3-20, 3-21, 4.2-14, 4.3-28, 4.3-51, 4.3-55, 4.6-12, 4.6-21, et al.; Responses DOT-2, SC-5.

Lastly, the Project land use and development intensity would actually result in a reduction in potential traffic impacts when compared to the development of the subject site allowed under its existing General Plan “Commercial” Land Use and “Retail Commercial” zoning designations. Response SC-5 substantiates that a Business Park Alternative would not achieve basic Project Objectives and would actually result in increased impacts when compared to the Project. A Business Park Alternative is therefore considered infeasible. Please refer also to EIR Section 5.2, *Alternatives Analysis*.

The commenter requests that the City “consider the Project’s industrial use relative to adjoining sensitive receptors in light of Assembly Bill 98.” The Project described and evaluated in the EIR would not result in any significant impacts, including impacts at area sensitive receptors. Here the commenter lists sensitive receptor land uses already identified in the EIR (EIR, p. 4.6-15). Via established design and development review processes, the City would require that the Final Project designs comport with provisions of AB 98. The City would thus effectively implement AB 98. Note further, the EIR substantiates the Project would not result in any significant impacts at any area residential uses or other sensitive receptors. Please refer to the EIR in total.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-3**

#### *General Comments Re Project Description and Other Items*

*The Project includes a request to amend “the Festival at Moreno Valley Specific Plan” (“Amendment No. 2”). As stated in the Draft EIR, the subject property was excluded from the previously adopted “Amendment No. 1” of the MVF Specific Plan. Also, the subject property is not within the original planning area of the MVF Specific Plan according to the EIR (see, Figure 3.3-4). Thus, to the extent the Project’s EIR relies on the previous environmental analyses of the MVF Specific Plan, this is in error. Further, the Project apparently seeks a new zoning designation under the MVF Specific Plan of “Mix of Uses” as part of the Amendment No. 2 application. However, we do not see “Mix of Uses” as a zoning designation under the MVF Specific Plan -- the Project would appear to need a rezone to “Light Industrial” or perhaps “Business Park” but not “Mix of Uses.”*

### **Response SCA-3**

The commenter infers that the EIR relies “on the previous environmental analyses of the MVF Specific Plan.” This is incorrect. All analyses in the EIR are specific to the Project described therein. The EIR appropriately incorporates applicable provisions of relevant documents by reference.<sup>8</sup> The EIR does not rely on these documents for Project-specific analyses.

The Land Use designation for the Project is at the discretion of the Lead Agency. The EIR notes the requested “Mix-of-Uses” Land Use designation at EIR Section 1.7, *Discretionary Actions, Permits, Consultations*.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-4**

*The City must condition the Project consistent with the assumptions of the EIR’s analyses of various environmental issue areas. For example, the Draft EIR states “it is anticipated that 90 percent of Project traffic would access the Project site via the Project’s Heacock Street driveways(s); and approximately 10 percent of the Project traffic would access the Project site via the Project’s Ironwood driveway.” This must be made a condition of the Project’s approval; otherwise, traffic and noise impacts could be much worse than assumed by the EIR. As the Ironwood Driveway is designed to enable trucks to use it (40-ft wide), there is nothing preventing trucks from utilizing this driveway. Similarly, the assumption of the EIR that “trucks accessing the Project site would travel along designated truck routes,” is not supported by mandatory conditions or mitigation measures that would ensure that trucks do not use non-truck routes. If trucks use non-truck routes, traffic noise impacts could be more intense.*

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<sup>8</sup> CEQA Guidelines Section 15150 permits agencies to incorporate all or portions of another document into an EIR or ND, provided the material is publicly accessible. The materials referenced in the EIR are all publicly available. See also EIR Section 2.9, *Documents Incorporated by Reference*.



#### **Response SCA-4**

The commenter states: “The City must condition the Project consistent with the assumptions of the EIR’s analyses of various environmental issue areas.” The DEIR and Responses provided herein substantiate that all Project impacts would be less-than-significant or less-than-significant as mitigated. The Lead Agency may impose Conditions of Approval it deems appropriate.

The commenter speculates that subsequent development of the site would result in significant impacts not considered and addressed in the EIR. The commenter statements here lack evidentiary support. The City, through established design and development review processes, would assure that any development of the site conforms materially to the Project considered and evaluated in the EIR. Should a subsequent development proposal differ substantially from the Project described in the EIR, the City would evaluate that development consistent with CEQA requirements.

Findings and conclusions of the EIR are not affected.

#### **Comment SCA-5**

*The majority of the “technical studies” supporting the EIR were prepared in January 2022 prior to the Notice of Preparation of EIR (i.e., the VMT Analysis; Air Quality Impact Analysis; Health Risk Assessment; Greenhouse Gas Emission Analysis; Energy Assessment; and Noise Impact Analysis). The “Transportation Analysis Scoping Agreement” was prepared in June 2020. These studies do not adequately describe or evaluate current environmental conditions. For instance, the Air Quality Analysis states that construction is anticipated to begin in August 2022. This comment also applies to the 2021 biological assessment which in part is based on a “MSHCP Consistency Report” from 2015.*

*On the City’s website, the electronic links to several of the technical appendices do not match their descriptions (e.g., Appendix G is described as the Noise Impact Analysis but it is a link to a soils report; and Appendix I, “Geotech”, is a link to the November 2021 MSHCP Consistency Analysis Report).*

### **Response SCA-5**

The commenter notes that certain of the EIR technical documents pre-date the EIR NOP. The commenter contends that these analyses therefore do not accurately reflect baseline conditions applicable to the Project and the EIR analyses. The Lead Agency disagrees. Commenter remarks here are speculative and do not comprise substantial evidence.

It is the Lead Agency's determination that the EIR and all technical analyses adequately and accurately present relevant baseline conditions.<sup>9</sup> And further, that potential revisions in baseline conditions suggested by the commenter would not materially affect the EIR analyses or conclusions.

Internet posting discrepancies listed by the commenter are noted. Nonetheless, as indicated by the commenter's remarks, all relevant documents have been made available (even if incorrectly linked on the City's website).

Findings and conclusions of the EIR are not affected.

### **Comment SCA-6**

*The Project Description section of the EIR does not disclose that "vicinity land uses" include residences to the west of the site across Heacock Street. The EIR's Figure 3.3-1 describes the properties to the west as "commercial/service uses" when, in fact, a number of these properties labeled as "commercial" are single family residences. Surrounding uses include single family homes located within 150 feet of the Project site. Surrounding zoning should also be described as including residential zoning to the north across Ironwood Avenue.*

### **Response SCA-6**

The commenter states: "The Project Description section of the EIR does not disclose that 'vicinity land uses' include residences to the west of the site across Heacock Street . . ." This is incorrect. EIR Figure 3.3-1, *Existing Land Uses* clearly identifies residential land uses west of the Project site, across Heacock Street. The land uses directly opposite the

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<sup>9</sup> As requested by SCAQMD, air quality modeling for the Project has been updated employing the latest available version of CalEEMod. As substantiated in the DEIR and Responses provided herein all project air quality impacts would be less-than-significant.

Project site across Heacock Street, at the corner of Heacock Street and Ironwood Avenue, are correctly identified as commercial/service uses. As noted by the commenter previously, the EIR has specifically identified residential land uses (sensitive receptors) nearest the Project site.

The commenter requests revision to the EIR presentation of area zoning. The Lead Agency considers the EIR discussion of area zoning and area zoning depicted in EIR Figure 3.3-4, *Zoning Designations* to be adequate and accurate for the purposes of the EIR analyses.

Findings and conclusions of the EIR are not affected.

#### **Comment SCA-7**

*The EIR states that “the Project” described and evaluated through the EIR is a “Project Site Plan Concept”. The EIR states that “final designs of all Project elements will be realized consistent with design requirements and standards identified within the Specific Plan No. 205 Amendment No. 2 document.” There is no technical “site plan” in the EIR indicating important Project elements such as parking, circulation, fire lanes, fencing, etc. The EIR must attempt to describe as much as possible about the Project’s design and operation to ensure that potential impacts are fully assessed and disclosed through the EIR. Also, the Energy Efficiency/Sustainability features listed in the EIR’s section 3.4.10 are not requirements of the Project; there is no guarantee they are carried forward to any “final” Project Plans. Furthermore, Appendix B referred to as “Amendment No. 2” to the EIR on the City’s planning website is the “Amendment to Specific Plan 205” dated February 21, 2021. This document (Appendix B) does not include the proposed Project and is not updated to reflect the proposed industrial use. We could not locate a document entitled “Amendment No. 2” (to the Festival Specific Plan/MVF) with the EIR documents available online.*

*We observe that the Project’s design, particularly circulation elements such points of ingress and egress (driveways) appears inconsistent with the “MVF” Specific Plan document (See, Draft EIR, Appendix B, p. 57). This figure shows a “major entry” point on Heacock Street with a “minor entry” point at Davis Street, not the two truck driveways indicated on the Project rendering in the EIR. MVF Specific Plan Section 5.2.3 states that all properties within the “MVF” shall be*

*developed in conformance with the Specific Plan. Similarly, the Project must be conditioned to be 55 feet in height consistent with the Building Height provisions of the “MVF” Specific Plan (Appendix B, p. 63). The Project should likewise follow the Business Park Design Standards listed in the “MVF” Specific Plan, including that “a variety of building sizes and setbacks should be provided in order to avoid long monotonous building facades and to create diversity.” The “MVF” Specific Plan indicates that “along the Ironwood Avenue and Heacock Street boundary, 8’ high solid fencing shall be used to restrict access and view to the residential areas and provide a sound buffer from traffic noise.” We do not see that a solid wall along Ironwood and Heacock Avenue is part of the Project’s design (from the available rendering in the EIR). These and other design elements from the MVF Specific Plan must be carried over to the Project’s design to ensure consistency with the applicable land use plan.*

#### **Response SCA-7**

The commenter asserts that additional Project details are required. The EIR Project Description complies with CEQA *Guidelines* requirements: Project Location, Objectives, general descriptions of relevant technical, economic, and environmental characteristics and intended uses(s) of the EIR (see EIR Section 3.0, *Project Description*; EIR Section 2.8, *Intended Use of this EIR*). The *Guidelines* emphasize that project descriptions should avoid “extensive detail beyond that needed for evaluation and review of the environmental impact.” For the benefit of the commenter, the Project site plan concept providing additional detail is presented at Figure 1, following. Full Project plan sets are available through the Lead Agency. Commenter remarks regarding energy impacts are addressed at subsequent Response SCA-13. The Lead Agency ensures energy efficient designs conforming to incumbent Title 24 and CalGreen requirements via established building permit review processes.

With regard to Conditions of Approval suggested by the commenter, the DEIR and Responses provided herein substantiate that all Project impacts would be less-than-significant or less-than-significant as mitigated. The Lead Agency may impose Conditions of Approval it deems appropriate.

Findings and conclusions of the EIR are not affected.



## **Comment SCA-8**

### *Air Quality*

*All on-site cargo handling equipment should be zero emission/electric only. The Draft EIR describes that cargo handling equipment will be “non-diesel (e.g., gasoline and/or electric powered).” (p. 1-15). At the least, this description should be clarified.*

*The Project must be conditioned in the manner assumed by the EIR with respect to cold storage. The EIR assumes that a “maximum of 15 percent of Project gross floor area (33,060) will comprise refrigerated warehouse uses.” (p. 1-15) If the Project is not conditioned in a manner that is consistent with the EIR’s air quality analysis, the impacts of the Project could be much worse in practice.*

*In terms of the Project’s consistency with the South Coast Air Quality Management District’s Air Quality Management Plan (AQMP), an adopted threshold of significance for air quality impacts, the EIR purports to consider the Project’s consistency with the 1993 AQMP (and it loosely references the 2016 AQMP and a “2011” AQMP in various places). It is unclear what version of the AQMP that the EIR is relying upon to evaluate Project impacts. Importantly, the AQMP was updated in 2022. The Project’s consistency with the AQMP must be evaluated pursuant to the extant AQMP, not previous versions that did not encompass current air quality conditions and relevant regulations. For instance, the South Coast AQMD’s webpage states that the AQMP was updated to address the EPA’s most recent requirements for meeting primary and secondary ozone standards.*

*The 2022 AQMP is being developed to identify and implement strategies and control measures to meet the 2015 8-hour ozone NAAQS (70 ppb) as expeditiously as practicable, but no later than the statutory attainment deadline of August 3, 2038 for South Coast Air Basin and August 3, 2033 for the Coachella Valley. The 2022 AQMP is based on the most recent assumptions provided by both CARB and SCAG for motor vehicle emissions and demographic updates and includes updated transportation conformity budgets. (p. 1-14)*

*The EIR’s failure to evaluate Project consistency with the extant AQMP must be corrected. The EIR concludes that the Project is consistent with the 1993 AQMP because it will not cause air*

*quality violations or delay timely attainment of air quality standards specified “in the AQMP.” The current AQMP has updated air quality standards that have been overlooked here.*

*Further under Criterion No. 2, the Project is not shown to be consistent with the AQMP since “the AQMP” is based on the land use assumptions of the City of Moreno Valley’s General Plan in place at the time of the adoption of the AQMP. As the EIR acknowledges, the site’s land use designation under the 2006 General Plan is “Commercial”. Since the Project seeks a land use amendment, the proposed use is not consistent with the land use assumptions of the AQMP, and therefore consistent with the AQMP’s assumptions about attainment of air quality standards. The proposed land use amendment does not address this inconsistency which is again based on the land use designations in place at the time of the AQMP’s adoption.*

### **Response SCA-8**

Commenter statements regarding cargo handling equipment are noted. The Lead Agency considers the EIR language here accurate and appropriate.

The commenter speculates on potential development of the site not reflected in the EIR. These comments have been addressed previously. The commenter speculates on air emissions impacts not considered and addressed in the EIR. No evidentiary support is provided for these statements.

The commenter provides various remarks regarding the EIR evaluation of Project/AQMP consistency. The AQMP is based on General Plan land use assumptions. As discussed in the EIR, the Project’s proposed change in General Plan land use would actually result in a decrease in emissions when compared to assumptions in the AQMP (see EIR, pp. 4.3-40, 4.3-41). It is noted further that the Project is not regionally significant as defined under CEQA,<sup>10</sup> and would therefore not otherwise substantially affect or conflict with regional plans such as the AQMP.

Additionally, as substantiated in the DEIR and Responses provided herein, all Project air pollutant emissions levels would be substantially below applicable thresholds. Even if

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<sup>10</sup>See: CEQA Guidelines Section 15206, *Projects of Statewide, Regional, or Areawide Significance*.



the Project emissions were doubled, applicable thresholds would not be exceeded, and the Project would not result in emissions not already considered in the AQMP. The Project would therefore not conflict with the AQMP. Please refer also to Responses AQMD-4, SC-3, FEIR Attachment 2.

Findings and conclusions of the EIR are not affected.

**Comment SCA-9**

*The City does not appear to have required a “study” with respect to the roadway segment of Heacock Street between Manzanita Avenue to SR-60 as set forth in General Plan mitigation measure AQ10. This roadway segment includes the Project’s location (i.e., the segment of Ironwood to SR 60 is within the roadway of Manzanita Avenue to SR 60). Similarly General Plan, Policy 9.5.3, Section 5-6, requires that the City conduct studies of “specified segments to determine if additional improvements will be needed to maintain acceptable LOS at General Plan buildout. Generally, these segments will be studied as new developments are proposed in their vicinity.” In short, General Plan policies relating to mitigation of air quality impacts do not appear to have been followed or required in this case.*

**Response SCA-9**

Commenter provides various remarks on roadway segment Level of Service (LOS) conditions. Potential LOS deficiencies are not CEQA considerations. Please refer to Response DOT-2 regarding appropriate Project traffic impact analysis.

Lastly, the Project land use and development intensity would actually result in a reduction in potential traffic impacts when compared to development of the subject site allowed under its existing General Plan “Commercial” Land Use and “Retail Commercial” zoning designations. The Project would also result in reduced impacts when compared to business park development of the subject site (see Response SC-5 et al.). Please refer also to EIR Section 5.2, *Alternatives Analysis*.

As substantiated in the DEIR and these Responses, the Project would result in improved LOS conditions when compared to LOS conditions assumed in the General Plan. The EIR

substantiates that the Project would not result in any significant air quality impacts (EIR Section 4.3, *Air Quality*, et al.). CEQA does not require mitigation for impacts determined to be less-than-significant.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-10**

#### *Cumulative Air Quality Impacts*

*CEQA defines a “cumulative impact” as one that may be individually limited but cumulatively considerable when considered with past, present, and foreseeable future projects. (State CEQA Guidelines, §§ 15130 (a), 15355 (b).) The City must evaluate the Project’s potential for significant cumulative air quality impacts, particularly the EIR must examine the Project’s NO<sub>x</sub> impacts (truck diesel emissions) in combination with other cumulative industrial projects in proximity of the proposed Project.*

*A billion square feet of industrial warehousing has been constructed in the Inland Empire in the last ten years or so. Approximately 400 million square feet of industrial development has been approved or is in process of approval in Riverside County. 11 At a local level, the City has approved or is considering the approval of at least the following warehouse projects in the last 10-15 years:*

- March Business Center (2009) – General Plan Amendment allowing 1,484,407 square feet of industrial warehouse space on 66.9-acres*
- Master Plot Plan PA07-0035 (2010) - 409,598 square foot industrial warehouse building space*
- West Ridge Commerce Center (2011) - 937,260 square foot warehouse distribution building*
- VIP Moreno Valley Project (2012) - 1,616,133 square foot warehouse space*
- First Inland Logistics Center II Project (2013) - 400,130 square feet warehouse space*
- First Nandina Logistics Center Project (2014) - 1,450,000 square feet warehouse space*
- Prologis Eucalyptus Industrial Park Project (2015) - 2,244,419 square feet of warehouse uses including a General Plan Amendment from residential to Light Industrial*
- World Logistics Center (2015) - 40.6 million square feet of warehouse logistics development on 3,918 acres in eastern Moreno Valley*
- Indian Street Commerce Center Project (2016) - 446,350 square feet of warehouse space*

- Moreno Valley Logistics Center (2016) - 1,736,180 total square feet of warehouse space<sup>12</sup>
- Brodiaea Commerce Center (2017) - 262,398 square foot warehouse including a rezone from - Business Park-Mixed Use to "Light Industrial"
- Moreno Valley Business Park (2021) - 220,390 square feet of warehouse logistics development including a General Plan Amendment to from commercial to light industrial
- Compass Danbe Centerpointe (2021) –approval for a General Plan Amendment to allow the development of two light industrial buildings of 389,603 square feet
- Moreno Valley Business Center (2023) – approval for 164,187 square feet of industrial warehouse development
- Heacock Commerce Center – pending application for a General Plan Amendment and Change of Zone for two high cube industrial buildings totaling 873,967 square feet
- Edgemont Commerce Center – pending application for the development of a 142,325- square foot commerce center project with Change of Zone to allow a warehouse greater than 50,000 square feet.

*The failure here to consider the proposed Project's cumulative air quality impacts cannot be rationalized in light of the vast amount of industrial development proposed and approved in the City. Moreover, the 2006 General Plan did not, and could not have, considered or mitigated the extent of the City's industrial development particularly the 40-million square foot World Logistics Center Project proposed in or about 2015. A cumulative air quality analysis is particularly relevant given the warehouse projects to the immediate south and east of the Project site. Together, these projects will have air quality, traffic, and noise impacts that must be considered.*

*The EIR concludes there is no need for a cumulative air quality impact analysis in part because it asserts that project-specific air quality impacts are less than significant. As authority, the EIR cites an appendix to a 2003 white paper issued by the South Coast AQMD, which is selectively quoted and misapplied. The generalized discussion concerns South Coast AQMD's approach to cumulative impact analysis when it is the Lead Agency for a project, which it is not here. Moreover, this 20-year-old appendix states that AQMD does not "generally" consider projects to have cumulative impacts when those projects do not exceed project-specific thresholds. Here, however, the EIR intentionally ignores the reality of hundreds of thousands of square feet of warehouses being built and approved in Moreno Valley, particularly in the immediate vicinity of the proposed*

*Project. Environmental agencies continue to study, document and recognize the adverse health effects of poor air quality conditions especially with respect to children 15. In fact, the South Coast AQMD is in the process of updating its “guidance documents” in terms of cumulative impact analysis, while recognizing that cumulative air quality analysis is a requirement of CEQA.*

### **Response SCA-10**

Commenter asserts the EIR analysis of potential cumulative air quality impacts is somehow deficient. The Lead Agency disagrees. The commenter remarks are addressed herein at Response SC-3 et al.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-11**

#### *Biology*

*The Draft EIR states that the Project would have a less-than-significant biological impact because it would comply with the Western Riverside MSHCP (Draft EIR section 1.9.4) based on a 2021 MSHCP survey. Sierra Club submits that this biological survey must be updated.*

*The MSHCP survey (2021) states that “the only MSHCP survey requirements were for burrowing owl. Focused burrowing owl surveys were conducted in 2015 and no burrowing owl was detected.” This is inadequate. A purported survey conducted ten years ago is not adequate for determining the level of potential impact to a protected species. Furthermore, the 2015 study is apparently not part of the record so that it can be reviewed for compliance with standard protocols. (See, Survey and Monitoring Protocols and Guidelines from California Department of Fish and Wildlife 20) The MSHCP requires a habitat assessment for burrowing owl following specific protocol. If any potential habitat is present, a focused burrowing owl is required. This information is paramount given that the western Burrowing Owl has recently been made a candidate for listing under the California Endangered Species Act (CESA).*

*Additionally, the Department of Fish and Wildlife has permitting requirements for the take of lake or streams. Riparian habitat is also protected under the Western Riverside MSHCP. Projects that impact riparian habitat must comply with Section 6.1.2 of the MSHCP. The EIR improperly*

*concludes that impacts are less than significant despite the Project permanently impacting a riparian area in the northern portion of the site without any mitigation for the loss of this resources. Since the Project will impact a documented riparian area, the EIR should conclude the Project has the potential for a “substantial adverse effect on riparian habitat ... identified in ... plans ... by the California Department of Fish and Wildlife (CDFW)” (see, EIR’s threshold of significance for biological impacts). The City’s 2006 General Plan states that build out of the General Plan will cause the replacement of riparian vegetation along drainage ways and natural drainage courses with man-made features. The General Plan’s mitigation program Section 5.9 B3 thus states that, “where feasible, projects shall be designed to minimize impacts on sensitive habitat.” The General Plan’s Policy 7.4.1 states that the City shall “require all development ... proposed adjacent to riparian resources ... to provide adequate buffers to mitigate impacts to such areas.” We submit that mitigation is required in this case.*

### **Response SCA-11**

The commenter asserts that the EIR biological resources assessment is inadequate, and that the Project would somehow result in potentially significant biological resources impacts. The Lead Agency disagrees. Note first that the Project site is heavily disturbed and is bordered by urban land uses and urban roadways. As discussed in the EIR, “The Project site has been significantly impacted due to years of disking, grading, disturbance, trash, off-road trails, and footpaths. Due to extensive disturbance of the Project site, no special-status plant species are considered present onsite. Thus, no potentially significant impacts to special-status plant species are anticipated as a result of site development. Due to the absence of native vegetation and the disturbance at the Project site, special-status wildlife species are unlikely to be present at the Project site” (EIR, p. 4.7-13).

The commenter misstates the EIR discussions regarding burrowing owl surveys and potential impacts to burrowing owls. In context the EIR states: “The Project site is located within the mapped survey area for burrowing owl. Focused burrowing owl surveys were conducted in July 2015 (Hernandez Environmental Services). No burrowing owl was detected. Similarly, no burrowing owls or their sign were detected during the current [2021] surveys and there was no evidence that any burrowing owls occur onsite. In addition, this species has not been recorded from the Project site in the past. Burrowing

owls are presumed absent from the site” (EIR, p. 4.7-7). As discussed in the DEIR, the Project site is located within the mapped survey area for burrowing owl. Focused burrowing owl surveys were conducted in July 2015 (Hernandez Environmental Services). No burrowing owls were detected. Similarly, no burrowing owls or their sign were detected during the current surveys and there was no evidence that any burrowing owls occur onsite. In addition, this species has not been recorded from the Project site in the past. Burrowing owls are presumed absent from the site (Project Biological Resources Report, p. 18).

The Hernandez Environmental Services report is merely cited as a reference substantiating that the Project site has not been historically occupied by the owl. The DEIR and supporting Project Biological Resources Report in no way rely solely on information presented in the Hernandez Environmental Services report. Also, DEIR mitigation (MM 4.7.2) requires pre-construction surveys for the owl, and compliance with CDFW owl protection/relocation protocols if owls are determined to be present.

All EIR studies and source materials can be accessed by contacting the City.

The commenter asserts that the Project would somehow result in potentially significant impacts to riparian habitat. The Lead Agency disagrees. As discussed in the EIR:

“Historically, an ephemeral channel crossed the northern portion of the site and drained from the northwest to southeast. City-approved storm drain re-alignment and undergrounding of stormwater lines in 2009 redirected all flows entering the property from the north and west into an underground storm drain north of the property.

The undergrounding of stormwater lines starved the onsite channel of upstream water flows and turned the onsite channel into an isolated remnant channel. Development of downstream properties has further isolated this channel. More recent grading eliminated the southern-most portion of the channel on the Project site.

The onsite remnant channel is isolated from both upstream and downstream aquatic resources. No off-site water can reach the channel. The only water that can enter the channel would be direct rainfall on the Project site. As the site is flat and soils porous, rainfall run-off into the channel would be minimal. There is no evidence of rainfall run off into the channel and no evidence of current or recent flows in the channel.” (EIR, pp. 4.7-4, 4.7-5)

On this basis, no sensitive riparian habitat or riparian resource exists within the Project site. The Project does not propose or require uses or operations that would otherwise adversely affect riparian habitat or riparian resources.

Findings and conclusions of the EIR are not affected.

#### **Comment SCA-12**

##### *Hydrology and Water Quality*

*The EIR lacks a hydrology or water quality study. The EIR summarily states that a future water quality management plant (WQMP) will be prepared prior to issuance of grading permits. This is inadequate under CEQA. CEQA requires the preparation of relevant studies prior to the approval of the proposed activity that may result in environmental harm. This is particularly inadequate where the purported “MSHCP survey” notes that an “ephemeral channel crossed the northern portion of the site” (see, MSHCP survey Section 1.0).*

#### **Response SCA-12**

The commenter notes that the EIR does not include a hydrology or water quality study. Potential hydrology or water quality impacts were appropriately screened out of the EIR analysis through the EIR Initial Study process. The commenter is referred to the discussion of potential hydrology and water quality impacts presented in the EIR Initial Study, EIR Appendix A.

Additionally, the Project comprises conventional urban infill development in an area of the City served by existing storm drains. The City requires detailed drainage and water



quality management plans prior to or concurrent with development permit application(s). There is no indication that “the Project would result in “environmental harm” to an ephemeral stream as asserted by the commenter. As noted previously, the City-approved storm drain re-alignment and undergrounding of stormwater lines in 2009 redirected all flows entering the property. The undergrounding of stormwater lines starved the onsite ephemeral channel of upstream water flows and turned the onsite channel into an isolated remnant channel.

With regard to WQMP requirements, the City requires submittal and approval of a WQMP as part of the City’s established development permit process. The Project WQMP has been submitted to the City. The WQMP Owner’s Certification is provided at FEIR Attachment 3.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-13**

#### *Energy*

*The Energy Analysis is based on assumptions about the operation of the Project site to include the assumption that 15% of the Project building will be used for “high cube cold storage.”. As can be seen from Energy Analysis Table 7, cold storage uses are estimated to require a far greater amount of energy than typical “warehousing” uses. For this reason, the Project must be conditioned to allow for only 15% of cold storage uses in accordance with the assumptions of the EIR.*

*The Project will result in the consumption of 2,071,348 kW h of electricity per year (Table 7), and it will consume 192,858 gallons of fuel annually. The Draft EIR concludes the Project will not result in energy usage impacts and no mitigation is proposed. This conclusion is unsupported by the record.*

*State CEQA Guidelines Appendix F provides that “[t]he goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and (3) increasing reliance on renewable energy sources.” (emphasis added) Guidelines*

*Appendix F puts “particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.” The conclusions of the EIR’s energy analysis are unsupported by evidence where the Project does not adopt any measures to reduce fuel consumption or incorporate sustainability building practices beyond those required by the current Building Code (Title 24/Cal Green).*

*Fuel consumption can be reduced, for example, by utilizing zero emission delivery vehicles. The Project should establish fleet efficiency requirements for vehicle fleets. This should include, at a minimum, requirements that industrial tenants shall use exclusively zero emission light and medium-duty delivery trucks and vans; shall use only zero emission service equipment such as forklifts and yard trucks (electric only/no natural gas); and shall use near-zero and zero-emission technologies in heavy-duty applications such as “last mile delivery.”<sup>28</sup> As the State moves toward its goal of zero emission goods movement, the City must ensure that the Project is in line with this important objective by also requiring the phase-in of zero emission or clean technology for heavy duty trucks. According to CARB, actions to deploy both zero emission and cleaner combustion technologies will be essential to meet air quality goals in California particularly with respect to goods movement. Additional, feasible mitigation for operational air quality impacts includes the phase-in of electric, hybrid electric, hydrogen electric, or battery operated (i.e., non-diesel) trucks. The Project should be conditioned to adopt a “Diesel Minimization Plan” whereby zero emission trucks are phased in, e.g., 25% of truck fleets shall use zero emission technology by 2030, and increase that percentage by 10% per year, until 100% of trucks operating on sites are zero emission. This approach to mitigation is consistent with California regulations regarding phase-in of electric vehicles.<sup>30</sup> (California requiring manufacturers to produce zero emission trucks beginning in 2024); see also (discussing CARB’s Advanced Clean Truck Rule)<sup>31 32.</sup> A mitigation measure is feasible if it can be achieved in a reasonable period of time. (Guidelines, § 15364.) The California Attorney General has recommended the adoption of zero emission truck mitigation. (See <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf> [“requir[e] all heavy duty vehicles entering or operated on the project site to be zero-emission beginning in 2030”.])*

*The City should also impose measures on the Project to promote building sustainability and ensure compliance with Guidelines, Appendix F and to advance the policies and goals of Senate Bill 100*

*which commits to 100% clean energy in California by 2045.<sup>33</sup> Requiring the Project to utilize solar energy is one feasible means to ensure that the State can meet its laudable energy efficiency goals. In a footnote, the Draft EIR states that the Project building “roof designs” would be required to provide for “solar zones” that are reserved for the future installation of a solar electric or solar thermal system. The Project should be conditioned to require the installation of a solar energy system at the time of building construction, which is a feasible measure. City General Plan Policy 7.5.5 states the City will “encourage the use of solar power and other renewable energy systems.”<sup>34</sup> Requiring “LEED” certification is another means to promote sustainability.<sup>35</sup> The City’s 2006 General Plan Conservation Element <sup>36</sup> states that “the City recognizes the need to reduce energy use and greenhouse gas emissions and become a more sustainable community.” (Chapter 7, Section 7.6.3) Measures should be imposed consistent with this policy.*

### **Response SCA-13**

The commenter asserts that the EIR energy analysis is somehow deficient. The Lead Agency disagrees. Note first that the operative CEQA consideration is not “would the Project consume energy” as is inferred by the commenter. Rather, the threshold consideration is whether the Project would result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

The EIR at Section 4.5, *Energy* provides an estimate of project energy consumption. The EIR discussion also identifies Project energy efficient and conservation measures that would reduce energy consumption. Energy consumed by the Project would be typical for development of similar types and scope. Further, as noted in the EIR, developers and owners/tenants have vested financial incentives to avoid imprudent energy consumption practices. In this regard, there is growing recognition among developers and owners/tenants that efficient and sustainable construction and operational practices yield both environmental and economic benefits. Specific measures and design features that would reduce Project energy consumption and promote energy efficiencies generally are noted at EIR Section 1.3.10, *Energy Efficiency/Sustainability*. As supported by the EIR analysis, the Project would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. With regard to Conditions of Approval, as substantiated in the DEIR and these Responses, all Project

impacts would be less-than-significant as mitigated. The Lead Agency may impose Conditions of Approval it deems appropriate.

Findings and conclusions of the EIR are not affected.

**Comment SCA-14**

*Greenhouse Gas Emissions*

*The State of California has committed to aggressive goals for the reduction of the emissions causing global climate change. Assembly Bill 1279 requires the state to achieve net zero greenhouse gas emissions (GHG) as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter. The bill requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels no later than 2045. Yet the Draft EIR does not discuss specific goals or strategies of the California Air Resources Board (“CARB”) 2022 Scoping Plan for Achieving Carbon Neutrality (“2022 Scoping Plan”). The 2022 Scoping Plan is designed to achieve the emission reduction requirements of AB 1279. The Draft EIR must be revised with analysis that demonstrates Project consistency with the Scoping Plan strategies.*

*Also, the Draft EIR does not demonstrate the Project’s consistency with the policies of the 2020-2025 RTP/SCS. The Project conflicts with many “SCAG goals” including those aimed at reducing GHGs and improving air quality as well as those aimed at decreasing VMT.*

*The Draft EIR likewise ignores feasible measures from the California Air Pollution Control Officers Association’s Handbook for Analyzing Greenhouse Gas Emission Reductions, et al.<sup>42</sup>, including:*

*T-7 “Provide Ridesharing Program” including providing an app or website for coordinating rides among employees.*

*T-8 “Implement Subsidized or Discounted Transit Program” where the employer provides subsidies for employees to use public transit.*

*T-9 “End-of-Trip Bicycle Facilities” that includes bike parking, showers, and personal lockers.*

*T-10 “Provide Employer-Sponsored Vanpool” that provides groups of 5 to 15 employees with a cost-effective and convenient rideshare option for commuting.*

*T-13 “Provide Electric Vehicle Charging Infrastructure” that provides EV charging stations*

*beyond what is required by CalGreen/Title 24.*

*T-17 "Provide Pedestrian Network Improvement" that increases sidewalk coverage.*

*T-18-A "Construct or Improve Bike Facility" that constructs or improves a single bicycle facility that connects to a larger bicycle network*

*T-19 "Expand Bikeway Network" that would increase the length of the City's bikeway network.*

*T-24 "Expand Transit Network Coverage" to expand the local transit network by adding or modifying existing transit service.*

### **Response SCA-14**

The commenter asserts that the DEIR GHG analysis is somehow deficient. The Lead Agency disagrees. Discussion of the DEIR Project consistency with the Scoping Plan is considered to be adequate and accurate. Further, the DEIR and Responses provided herein substantiate that the Project would not result in any significant GHG emissions impacts, demonstrating support of the Scoping Plan. Additionally, the Lead Agency is not obligated to prepare every study or analysis requested by commenters. The Lead Agency has determined that further discussion of Project consistency with the Scoping Plan as requested by the commenter would not meaningfully contribute to understanding of the Project's potential environmental effects.

Discussion of the Project consistency with the RTP/SCS is presented at EIR, p. 4.1-18. Additionally, the Project is not regionally significant as defined under CEQA,<sup>11</sup> and would therefore not substantially affect regional plans such as the AQMP. Moreover, while the RTP/SCS strives to align with local plans and input, the potential for incompatibilities with existing general plans is acknowledged and expected due to the advisory nature of the regional plan and the ongoing process of local plan updates. SCAG has no land use authority to adopt, approve, implement, or otherwise regulate local land use plans or transportation projects identified in the Plan. Local governments reserve their land use authority and may incorporate, as appropriate, the recommended policies and strategies included in the Plan.<sup>12</sup>

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<sup>11</sup> See: CEQA Guidelines Section 15206, *Projects of Statewide, Regional, or Area-wide Significance*.

<sup>12</sup> See also *Connect SoCal 2024 – 2050 Final Program Environmental Impact Report*, Certified April 4, 2024 (SCAG), SCH # 2022100337, p. 3.11-30, et al.

The commenter lists various measures that generally reduce VMT impacts and related GHG emissions impacts. As substantiated in the EIR, all Project VMT impacts and Project GHG emissions impacts would be less-than-significant (EIR Section 4.2, *Transportation*, EIR Section 4.4, *Greenhouse Gas Emissions/Global Climate Change*). CEQA does not require mitigation for impacts determined to be less-than-significant. The commenter's listed measures are not required as mitigation for the Project impacts.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-15**

#### *Land Use*

*The Draft EIR ignores relevant policies of the City's 2006 General Plan as well as the pending 2024 General Plan Update including the Environmental Justice Element; the Noise Element; and Land Use Element. The City has issued a Notice of Preparation for a revised EIR for the General Plan 2040. The City should consider the policies of the pending 2040 General Plan insofar as the pending policies are relevant to the Project. In addition, the EIR must consider measures consistent with the 2040 General Plan's Climate Action Plan which is also pending before the City.*

### **Response SCA-15**

The commenter asserts the EIR discussion of General Plan consistency analysis is somehow deficient. The Lead Agency disagrees. The EIR discussion of land use policy consistency adequately and accurately evaluates potential land policies relevant to the Project considered here. Additionally, the Lead Agency is not obligated to prepare every study or analysis requested by commenters. The Lead Agency has determined that further discussion of Project consistency with policy statements as requested by the commenter would not meaningfully contribute to understanding of the Project's potential environmental effects. The 2024 General Plan update is, as noted by the commenter, pending and is not in effect relative to the Project considered in the EIR. It would be speculative to provide analysis of this plan, which has not been adopted.

With regard to environmental justice (EJ) issues, CEQA focuses on physical environmental impacts rather than EJ issues. Analyses presented in the EIR substantiate

that the Project would not result in any significant impacts, and therefore would not result in significant environmental impacts that would disproportionately affect EJ communities. Please refer also to Response SC-2.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-16**

#### *Noise*

*The EIR's noise analysis does not describe or evaluate the cold storage uses that are described as part of the Project. The analysis describes the operation of "roof top air conditioning units" for a traditional warehouse operation. Cold storage utilizes cooling systems (condensers and compressors) to continuously maintain refrigerated temperatures. The noise analysis must be revised to include all the equipment that is anticipated during Project operations. Further, all operational activities must be described including truck movements, parking lot activities, trash compactors and all rooftop mechanical equipment.*

*Furthermore, the EIR's noise analysis, Table 7-6, indicates significant operational noise impacts during nighttime hours. For instance, the combined project and ambient noise levels at R1, R2, R4, R5, and R6 are all above the City's nighttime residential noise standard of 55 dBA. This is a potentially significant impact under Significance Criteria A.*

### **Response SCA-16**

The commenter asserts that the EIR noise analysis is somehow deficient. The Lead Agency disagrees. With regard to noise from refrigerated warehouse uses, this is specifically addressed in the EIR Noise Analysis, and is conservatively assumed to apply to the Project in total, even though only 15 percent cold storage is anticipated (Noise Analysis, p. 31). All Project operational noise sources are considered, including those listed by the commenter (Noise Analysis Section 7.4, *Project Operational Noise Levels*). These individual noise sources are reflected in the total noise levels presented in the body EIR text.



The commenter misinterprets Noise Analysis Table 7-6. The significance of the Project contribution to ambient noise levels is dependent on ambient levels without the Project. As presented in Table 7-6, the Project would not increase noise levels in excess of applicable thresholds. The Project would therefore not result in significant nighttime noise level increases.

Findings and conclusions of the EIR are not affected.

**Comment SCA-17**

*Transportation*

*We submit that a transportation impact analysis (“TIA”) should be required for the Project based on the City’s Traffic Impact Preparation Guide (June 2020)<sup>48</sup> which states that:*

*Truck intensive uses. In addition to the standard TIA requirements, or if the standard TIA requirements are waived, projects that are “truck intensive” may be required to submit a study addressing the truck access routes (as defined in the Municipal Code Section 12.36.010), adequacy of the existing streets to be used (in terms of geometry and structural section), safety issues relating to the truck traffic, and the impacts of the truck traffic on existing residences and/or businesses. Truck traffic shall be evaluated utilizing PCEs. This information shall be provided in the Scoping Agreement.*

*Furthermore, per the City’s guidelines, a Level of Service analysis is arguably required. The Traffic Impact Preparation Guide (June 2020) states,*

*Development proposals that also include a General Plan Amendment, Specific Plan, Zone Change or other approval that increases traffic beyond what was approved in the General Plan will also be required to perform a General Plan Buildout analysis to assess long term impacts. This analysis will determine if the Circulation Element of the General Plan is adequate to accommodate projected traffic at the required LOS, or if additional mitigation is necessary.*

### **Response SCA-17**

The commenter asserts that a TIA should be prepared for the Project. The Lead Agency disagrees. See Responses DOT-2, SC-5, SCA-2, et al.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-18**

#### *Project Alternatives*

*CEQA requires that an EIR describe “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project.” (Guidelines, § 15126.6 (a).) The Draft EIR should evaluate a development alternative with a greater mix of uses, such as business park or professional park uses consistent with the development patterns contemplated by the MVF Specific Plan (i.e., “mixed use”). The City should explore a development that truly balances uses to create the type of “infill” or “transit oriented” development consistent with the Specific Plan to which the Project will become a part.*

*To ensure that alternatives are properly assessed and considered, CEQA “contains a ‘substantive mandate’ requiring public agencies to refrain from approving projects with significant environmental effects if ‘there are feasible alternatives or mitigation measures’ that can substantially lessen or avoid those effects’.” (County of San Diego v. Grossmont-Cuyamaca Community College Dist. (2006) 141 Cal.App.4th 86, 98; Pub. Res. Code § 21002.) A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. (Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092.) Rejected alternatives must be “truly infeasible.” (County of Marina v. Bd of Trustees of Calif. State Univ. (2006) 39 Cal.4th 341, 369.) Absent findings of infeasibility supported by substantial evidence, the City here must adopt the environmentally superior alternative.*

### **Response SCA-18**

The commenter asserts that the EIR Alternatives Analysis should be revised. The Lead Agency disagrees. The purpose of EIR Alternatives Analyses is not to explore every

possible development scenario as is suggested by the commenter. Rather, consistent with CEQA requirements, the EIR evaluates alternatives to the Project that would lessen its significant environmental effects while allowing for attainment of the basic Project Objectives. It is noted here that the Project *would not result in any significant environmental effects* [emphasis added]. For illustrative purposes only, the EIR also includes a “Reduced Intensity Alternative.” The EIR also includes a “No Project” analysis as is required under CEQA. There is no requirement to revise the EIR Alternatives Analysis. See also Response SC-5.

Findings and conclusions of the EIR are not affected.

### **Comment SCA-19**

#### *Notification of Resource Agencies*

*Given the potential for biological, hydrological, and other impacts we believe it is imperative that the City provide notice of the EIR to agencies with jurisdiction over resources that may be impacted by the Project.*

### **Response SCA-19**

Commenter offers opinions on appropriate EIR reviewing agencies. CEQANET<sup>13</sup> indicates the EIR NOC was provided to the following agencies:

California Air Resources Board (ARB), California Department of Fish and Wildlife, Inland Deserts Region 6 (CDFW), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Parks and Recreation, California Department of Toxic Substances Control (DTSC), California Department of Transportation, District 8 (DOT), California Department of Transportation, Division of Aeronautics (DOT), California Department of Transportation, Division of Transportation Planning (DOT), California Department of Water Resources (DWR), California Energy Commission, California Fish and Game Commission (CDFGC), California Highway Patrol (CHP), California Native American Heritage Commission (NAHC), California Natural

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<sup>13</sup> <https://ceqanet.opr.ca.gov/Search/Advanced>

Resources Agency, California Public Utilities Commission (CPUC), California Regional Water Quality Control Board, Santa Ana Region 8 (RWQCB), California State Coastal Conservancy (SCC), Colorado River Board, Office of Historic Preservation, State Water Resources Control Board, Division of Drinking Water, State Water Resources Control Board, Division of Drinking Water, District 20, State Water Resources Control Board, Division of Water Rights, State Water Resources Control Board, Division of Financial Assistance, University of California Natural Reserve System (UCNRS). Any interested party can access the EIR through the CEQANET website (search for SCH No. 2023080366).

Findings and conclusions of the EIR are not affected.

**Comment SCA-20**

*Conclusion*

*Thank you for your consideration of these comments and for including my office on the noticing list for future CEQA and public hearing notices related to the Project.*

**Response SCA-20**

The Lead Agency appreciates engagement in the Project CEQA review process. All required and requested noticing will be provided consistent with CEQA requirements.

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February 27, 2025

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*Subject: Comments on Moreno Valley Business Park Building 5 EIR (SCH NO. 2023080366)*

Dear Ms. Harper-Scott,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Moreno Valley Business Park Building 5 Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

BCH-1

### 1.0 Summary

The project proposes the construction and operation of one 220,390 square foot (sf) industrial warehouse building consisting of 33,060 sf of manufacturing use, 33,060 sf of high-cube cold-storage use, and 154,270 sf of general (non-high cube) warehousing use on a 9.98 acre site. The following discretionary actions are required to implement the proposed project:

1. PEN23-0092 (Specific Plan Amendment No. 2) amends the Specific Plan No. 205 Land Use Plan for the properties (approximately 9.98 acres) excluded under Specific Plan No. 205 Amendment No. 1. The Project would change the Specific Plan Land Use for these 9.98 acres from "Commercial/Retail" to "Mixed of Uses," enabling the development of up to 220,390 square feet of light industrial uses (see Figure 2).
2. PEN23-0042 (Plot Plan) allows the construction of an approximate 220,309 square-foot industrial tilt-up building at the southeast corner of Ironwood Avenue at Heacock Street.
3. PEN24-0167 (General Plan Amendment) redesignating the Project Site's General Plan Land Use from "Commercial" to "Business Park/Light Industrial"

BCH-2

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### 1.1 Project Piecemealing

The EIR does not accurately or adequately describe the project, meaning “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment” (CEQA § 15378). The proposed project is a piecemealed portion of a larger overall project to be developed by Ledo Capital Group within the City.

The EIR misleads the public and decision makers by circumventing adequate and accurate environmental analysis for the whole of the action - construction and operation of all Ledo Capital Group buildings as a whole. At minimum, piecemealed projects include the development of 425,000 square feet of warehouse/industrial buildings facilitated by associated land use changes (Resolution No. 2018-017<sup>1</sup> for General Plan Amendment (PEN16-0013), Ordinance No. 937<sup>2</sup> for Change of Zone (PEN16-0014), and Ordinance No. 935<sup>3</sup> amending SP 205 (PEN16-0015)). Notably, Resolution No. 2018-017 states that the project resulted in significant and unavoidable impacts to Air Quality, Greenhouse Gas/Global Climate Change, Land Use/Planning and Traffic/Transportation.

BCH-3

A project EIR must be prepared that accurately represents the whole of the action without piecemealing the project into separate, smaller development projects to present unduly low environmental impacts. CEQA Section 15161 describes project EIRs as examining “the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.” The specific development project is the construction and operation of all Ledo Capital Group buildings and redevelopment within the Festival Specific Plan area.

Additionally, CEQA Section 15146 requires that the degree of specificity in an EIR “will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.” Because there are multiple proposed buildings as part of a single project, the project EIR must be more detailed in the specific effects of the project. A project EIR must be prepared that accurately

<sup>1</sup> <https://portal.laserfiche.com/Portal/DocView.aspx?id=7812&repo=r-ebe39544>

<sup>2</sup> <https://portal.laserfiche.com/Portal/DocView.aspx?id=6000&repo=r-ebe39544>

<sup>3</sup> <https://portal.laserfiche.com/Portal/DocView.aspx?id=5998&repo=r-ebe39544>



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represents the whole of the action without piecemealing the project into separate, smaller development projects or development areas to present unduly low environmental impacts.

BCH-3  
(cont'd)

### 3.0 Project Description

The EIR does not include a detailed floor plan, site plan, building elevations, or a grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. The EIR does not provide any grading plan or information regarding the quantity of import/export material associated with project construction or site preparation. Verification of the import/export materials is vital as it directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. There are also no building elevations provided to verify building height, paint colors, or materials. The site plan included in Figure 1.3-1: Site Plan Concept has been edited to remove pertinent information from public review, such as the construction notes, zoning conformance matrix (FAR, development standard compliance, etc.), and site data. A revised EIR must be prepared to include wholly accurate and adequate detailed project site plan, floor plan, grading plan, elevations, and project narrative for public review.

BCH-4

#### 1.9.12 Impacts Not Found to be Potentially Significant: Population and Housing

The EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impact to population and housing. The EIR states that “Project-related employment demands would *likely* be filled by the existing personnel pool within the City and neighboring communities, with *little or no measurable increase* in the City resident population.” Notably, the geographic distance of “neighboring communities” is undefined. Relying on the workforce population of the entire Inland Empire region will increase project related VMT. Additionally, the EIR assumes that the region has an adequate personnel pool without providing any meaningful evidence to support this claim, such as the unemployed workforce’s interest in or qualifications for work in the industrial sector. The EIR has not provided any meaningful evidence to support a less than significant finding and must be revised to including a finding of significance.

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The EIR also states that, “Significant population growth is therefore not anticipated to occur as a direct result of Project implementation.” However, the EIR excludes from its analysis the project’s required General Plan Amendment and Specific Plan Amendment to change the land use designations of the project site from Commercial to Business Park/Light Industrial to facilitate industrial development. The EIR has not provided any meaningful evidence to support a less than significant finding and must be revised to including a finding of significance.



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The EIR has not provided a cumulative analysis discussion of approved projects and projects “in the pipeline” to quantify the City’s progress towards its General Plan buildout scenario and/or SCAG’s employment growth forecast. SCAG’s Connect SoCal Demographics and Growth Forecast<sup>4</sup> notes that the City will add 38,700 jobs between 2019 - 2050. Utilizing the EIR’s calculation of 214 employees, the project represents 0.55% of the City’s employment growth from 2019 - 2050. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2019 and projects “in the pipeline” to determine if the project will exceed SCAG’s employment growth forecast for the City. For example, other recent industrial projects such as Old 215 Business Park (345 employees), Compass Danbe Centerpointe Warehouse (677 employees), Cottonwood and Edgemont (175 employees), World Logistics Center (20,300 direct jobs plus 7,386 indirect/induced jobs in the County (3,693 jobs induced within City) total jobs in city = 23,993), Bay and Day Commerce Center (163 employees), and piecemealed industrial development in SP 205 (425,000 sf; 413 employees) combined with the proposed project will cumulatively generate 25,980 employees, which is 67.1% of the City’s employment growth forecast over 31 years accounted for by only a few recent industrial projects. This number increases exponentially when the City’s commercial development activity and other industrial development is added to the calculation. A revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved and “in the pipeline” to evaluate the City’s progress towards General Plan buildout capacity and SCAG’s forecasts.

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#### 4.1 Land Use Planning

The EIR has not provided analysis of the project in accordance with the required findings for approval of a General Plan Amendment as stated in Moreno Valley Municipal Code<sup>5</sup> Section 9.02.040. Section 9.02.040(H) specifically requires the following determinations be made for approval:

1. “The proposed amendment is consistent with existing goals, objectives, policies and programs of the general plan;
2. The proposed amendment will not adversely affect the public health, safety or general welfare; and
3. The proposed amendment will provide public benefits to the general community beyond those that may be unilaterally imposed by the city through the traditional exaction process, which will enhance public safety services, promote public health, increase recreational

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<sup>4</sup> SCAG Connect SoCal Demographics and Growth Forecast <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839>

<sup>5</sup> Moreno Valley Municipal Code <https://ecode360.com/43227814#43227814>

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opportunities, improve general community services for children and/or seniors or otherwise improve the quality of life of the residents of the city.”

Section 9.02.040(I) specifically states that public benefits, “shall include, but not be limited to, benefits afforded by a general plan amendment applicant, in lieu of those that may be unilaterally imposed by the city through the traditional exaction process, that shall remain a legal obligation of successors in interest, which the city council determines will enhance public safety services, promote public health, increase recreational opportunities, improve general community services for children and/or seniors or otherwise improve the quality of life of the residents of the city, which shall be memorialized in a legally enforceable agreement or other instrument or imposed as voluntarily-accepted conditions of approval subject to the review and approval as to legal form by the city attorney.” The EIR has not provided any information regarding the project’s compliance with these Municipal Code Sections and is inadequate as an informational document. The EIR must be revised to include information and analysis with all applicable sections of the Moreno Valley Municipal Code, including the required findings for approval of a General Plan Amendment application.

The EIR has not provided analysis of the project in accordance with the required findings for approval of a Specific Plan Amendment as stated in Moreno Valley Municipal Code<sup>6</sup> Section 9.13. Section 9.13.090 specifically requires the following determinations be made for approval:

- A. “The proposed specific plan or the amendment is consistent with existing goals, objectives, policies and programs of the general plan;
- B. The proposed specific plan or the amendment will not adversely affect the public health, safety or general welfare; and
- C. The proposed specific plan or the amendment will provide public benefits to the general community beyond those that may be unilaterally imposed by the city through the traditional exaction process, which will enhance public safety services, promote public health, increase recreational opportunities, improve general community services for children and/or seniors or otherwise improve the quality of life of the residents of the city.”

Section 9.13.100 specifically states that public benefits, “shall include, but not be limited to, benefits afforded by a specific plan or specific plan amendment applicant, in lieu of those that may be unilaterally imposed by the city through the traditional exaction process, that shall remain a legal obligation of successors in interest, which the city council determines will enhance public safety services, promote public health, increase recreational opportunities, improve general

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<sup>6</sup> Moreno Valley Municipal Code <https://ecode360.com/43227814#43227814>



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community services for children and/or seniors or otherwise improve the quality of life of the residents of the city, which shall be memorialized in a legally enforceable agreement or other instrument or imposed as voluntarily-accepted conditions of approval subject to the review and approval as to legal form by the city attorney.” The EIR has not provided any information regarding the project’s compliance with these Municipal Code Sections and is inadequate as an informational document. The EIR must be revised to include information and analysis with all applicable sections of the Moreno Valley Municipal Code, including the required findings for approval of a Specific Plan Amendment application.

Further, it must be noted that the horizon year of the City’s current General Plan is 2020. Any development beyond year 2020 is not accounted for or analyzed by the City’s current General Plan and its EIR. The project is proposed five years after the horizon year of the General Plan and therefore is not accounted for in its growth projections or environmental analysis. The EIR has not provided any information or analysis regarding the buildout conditions of the existing General Plan that it attempts to tier from. The EIR is inadequate as an informational document since the horizon year of the General Plan has passed and it has not provided a cumulative analysis of all Business Park/Light Industrial projects approved since the General Plan update analysis began in 2001. Further, the EIR also excludes from its analysis the project’s required General Plan Amendment and Change of Zone applications to allow development of industrial uses on the project site. The site was not anticipated to be developed with industrial development and is therefore not currently accounted for in regional and local plans adopted for purposes of avoiding or mitigating environmental effects, including the AQMP, RTP/SCS, and General Plan. The EIR must be revised to include this information for analysis and include a finding of significance. A finding of significance must also be included because the project is not accounted for in the General Plan growth projections and is beyond the 2020 horizon year analyzed in the General Plan and its EIR<sup>7</sup>. A revised EIR must also not tier from the General Plan EIR for this reason.

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The EIR does not include a consistency analysis with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, such as the General Plan. The EIR is inadequate as an informational document and a revised EIR must be prepared with a consistency analysis with all General Plan policies, including the following:

1. Goal 2.1 A pattern of land uses, which organizes future growth, minimizes conflicts between land uses, and which promotes the rational utilization of presently underdeveloped and undeveloped parcels.

<sup>7</sup> Moreno Valley 2006 General Plan and EIR [https://www.moreno-valley.ca.us/city\\_hall/general-plan.html](https://www.moreno-valley.ca.us/city_hall/general-plan.html)

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2. Goal 2.2 An organized, well-designed, high quality, and functional balance of urban and rural land uses that will meet the needs of a diverse population, and promote the optimum degree of health, safety, well-being, and beauty for all areas of the community, while maintaining a sound economic base.
3. Objective 2.10 Ensure that all development within the City of Moreno Valley is of high quality, yields a pleasant living and working environment for existing and future residents, and attracts business as the result of consistent exemplary design.
4. Policy 2.10.1 Encourage a design theme for each new development that is compatible with surrounding existing and planned developments.
5. Policy 2.10.3 Require exterior elevations of buildings to have architectural treatments that enhance their appearance: a. A design theme, with compatible materials and styles should be evident within a development project; b. Secondary accent materials, colors and lighting should be used to highlight building features; c. Variations in roofline and setbacks (projections and recesses) should be used to break up the building mass. d. Industrial buildings shall include architectural treatments on visible facades that are aesthetically pleasing.
6. Policy 5.1.1 Plan access and circulation of each development project to accommodate vehicles (including emergency vehicles and trash trucks), pedestrians, and bicycles.
7. Policy 5.1.2 Plan the circulation system to reduce conflicts between vehicular, pedestrian and bicycle traffic.
8. Policy 5.1.3 Require adequate off-street parking for all developments.
9. Policy 5.1.4 Driveway placement shall be designed for safety and to enhance circulation wherever possible.
10. Policy 5.1.6 Design new developments to provide opportunity for access and circulation to future adjacent developments.
11. Objective 5.3 Maintain Level of Service (LOS) “C” on roadway links, wherever possible, and LOS “D” in the vicinity of SR 60 and high employment centers. Figure 9-2 depicts the LOS standards that are applicable to all segments of the General Plan Circulation Element Map.
12. Policy 5.5.7 For developments fronting both sides of a street, require that streets be constructed to full width. Where new developments front only one side of a street, require that streets be constructed to half width plus an additional 12-foot lane for opposing traffic, whenever possible. Additional width may be needed for medians or left and/or right turn lanes.
13. Policy 5.5.10 Provide adequate sight distances for safe vehicular movement at all intersections and driveways.

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## 4.2 Transportation

The EIR improperly “screens out” the project from performing a project-specific LOS analysis. Appendix C: Transportation Analysis Scoping Agreement states that the, “Project generates less

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than 100 peak hour trips (both actual vehicles and PCE),” in an effort to artificially appease the City’s Traffic Impact Analysis Guidelines<sup>8</sup> that exempts projects generating less than 100 peak hour trips from providing a complete LOS analysis. However, the project analyzed by the EIR provides a very specific mix of uses inside a single building - 33,060 sf of manufacturing use, 33,060 sf of high-cube cold-storage use, and 154,270 sf of general (non-high cube) warehousing use. The EIR does not provide any mitigation measures or note that conditions of approval exist to require all future tenants to adhere to this specific mix of uses during their operation. The EIR has clearly chosen this specific quantity and mix of internal uses in order to artificially skew impacts downwards to avoid several thresholds of significance. As an example, the EIR has not evaluated the quantity of peak hour trips generated if the entirety of the building is utilized as a high-cube warehouse, meaning that any future tenant that operates with any mix of uses other than those specified in the EIR has the potential to generate significant impacts. If the mix of uses were to be included as mitigation or conditions of approval, it would not be feasible mitigation as it is not possible for the lead agency to ensure that the specific mix of uses by square footage will be adhered to at all times throughout the life of the project. There is no reasonable assurance that the project operations will generate less than 100 peak hour trips at all times throughout the life of the project, and the project’s impact is therefore considered significant and unavoidable.

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Further, the EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a warehouse, which will drastically increase project-generated VMT. The project’s truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project’s actual VMT generated is further inconsistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.

The EIR also excludes any input/output sheets related to analyzing VMT utilizing RIVTAM. The input parameters utilized for analysis and subsequent outputs generated by RIVTAM contribute directly to analysis of the problem at hand and must be included in a revised EIR in order to comply with CEQA’s requirements for meaningful disclosure and incorporation (CEQA § 15150 (f)).

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<sup>8</sup> Moreno Valley Traffic Impact Analysis Preparation Guide <https://www.moval.org/departments/public-works/transportation/TIA-Guidelines.pdf>

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The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site or the maneuvering area available at the intersection of the project driveways and adjacent street. The EIR states that, "The final design of the Project site plan and all Project traffic improvements would be subject to review and approval by the City, thereby ensuring conformance of the Project improvements with City design and safety standards," and that, "Efficient and safe access within, and access to, the Project is provided by the site plan design concept, site access improvements, and site adjacent roadway improvements included as components of the Project. On-site traffic signing and striping would be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point would be reviewed to ensure conformance with City sight distance standards at the time of preparation of final grading, landscape and street improvement plans."

This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). The EIR has not provided any details regarding the City's design and safety standards or City sight distance standards for the items listed above and/or road development, stacking distances, lines of sight, or meaningful analysis of the project's compliance or noncompliance with these requirements. The EIR makes the sweeping conclusion that "Efficient and safe access within, and access to, the Project is provided by the site plan design concept," but there is no analysis of the site plan design concept to support this statement. Deferring this required environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include a finding of significance as the EIR has not provided any meaningful evidence to support a less than significant finding.

The EIR states regarding emergency access that, "...representatives of the Moreno Valley Police Department and Moreno Valley Fire Department would review the Project's plans to ensure that emergency access is provided consistent with Department(s) requirements." This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). The EIR has not provided any details regarding the requirements for emergency access or meaningful analysis of the project's compliance or noncompliance with these requirements. Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must

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be prepared to include a finding of significance as the EIR has not provided any meaningful evidence to support a less than significant finding.

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#### **4.3 Air Quality, 4.4 Greenhouse Gas Emissions/Global Climate Change, and 4.5 Energy**

The project analyzed by the EIR provides a very specific mix of uses inside a single building - 33,060 sf of manufacturing use, 33,060 sf of high-cube cold-storage use, and 154,270 sf of general (non-high cube) warehousing use. The EIR does not provide any mitigation measures or note that conditions of approval exist to require all future tenants to adhere to this specific mix of uses during their operation. The EIR has clearly chosen this specific quantity and mix of internal uses in order to artificially skew impacts downwards to avoid several thresholds of significance. As an example, the EIR has not evaluated the Air Quality, GHG, or Energy impacts if the entirety of the building is utilized as a high-cube warehouse, meaning that any future tenant that operates with any mix of uses other than those specified in the EIR has the potential to generate significant impacts. If the mix of uses were to be included as mitigation or conditions of approval, it would not be feasible mitigation as it is not possible for the lead agency to ensure that the specific mix of uses by square footage will be adhered to at all times throughout the life of the project. There is no reasonable assurance that the project operations will generate less than significant impacts to Air Quality, GHG, and Energy at all times throughout the life of the project, and the project's impacts are therefore considered significant and unavoidable.

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The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. The EIR provides general information about the census tract's CalEnviroScreen scores but does not provide meaningful analysis regarding the health impacts and effects of severe pollution rates. This is in conflict with CEQA Guidelines Section 15131 (c), which requires that "Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project." This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0<sup>9</sup>, CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6065042404) ranks worse than 69% of the rest of the state overall in overall pollution burden applied to the socioeconomic factors of the population. The surrounding community bears the impact of multiple

<sup>9</sup> CalEnviroScreen 4.0 <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>



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sources of pollution and is amongst the most severely polluted census tracts for many pollution indicators measured by CalEnviroScreen. For example, the project census tract ranks in the 99th percentile for ozone burden, 61st percentile for particulate matter (PM) 2.5 burden, 86th percentile for diesel PM burden, and 60th percentile for traffic burdens. All of these environmental factors are typically attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure<sup>10</sup>. The very small particles of diesel PM can reach deep into the lung, where they can contribute to a range of health problems. These include irritation to the eyes, throat and nose, heart and lung disease, and lung cancer<sup>11</sup>.

The census tract also bears more impacts from cleanup sites than 58% of the state. Chemicals in the buildings, soil, or water at cleanup sites can move into nearby communities through the air or movement of water<sup>12</sup>. The census tract also ranks in the 59th percentile for impacts from toxic releases. People living near facilities that emit toxic releases may breathe contaminated air regularly or if contaminants are released during an accident<sup>13</sup>.

Further, the census tract is a diverse community including 69% Hispanic and 6% African-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 79% of the census tract over age 25 has not attained a high school diploma. The community also has a high rate of poverty, meaning 81% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care<sup>14</sup>. Poor communities are often located in areas with high levels of pollution<sup>15</sup>. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution<sup>16</sup>. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 70th percentile for incidence of cardiovascular disease and 56th percentile for incidence of asthma. The community also has a high rate of linguistic isolation, meaning 61% of the census tract speaks little to no English and faces further inequities as a result.

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<sup>10</sup> OEHHA Ozone <https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone>

<sup>11</sup> OEHHA Diesel Particulate Matter <https://oehha.ca.gov/calenviroscreen/indicator/diesel-particulate-matter>

<sup>12</sup> OEHHA Cleanup Sites <https://oehha.ca.gov/calenviroscreen/indicator/cleanup-sites>

<sup>13</sup> OEHHA Toxic Releases <https://oehha.ca.gov/calenviroscreen/indicator/toxic-releases-facilities>

<sup>14</sup> OEHHA Poverty <https://oehha.ca.gov/calenviroscreen/indicator/poverty>

<sup>15</sup> Ibid.

<sup>16</sup> Ibid.

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Additionally, the proposed project's census tract (6065042404) and the census tracts adjacent to the project site (6065042519 (south/southeast), 6065042515 (south/southwest), and 6065042405 (west)) are identified as SB 535 Disadvantaged Communities<sup>17</sup>. This indicates that cumulative impacts of development and environmental impacts in the City are disproportionately impacting these communities. The EIR does not discuss that the project site and surrounding area are disadvantaged communities and does not utilize this information in its analysis. The EIR has not considered the environmental impacts in relation to the SB 535 status of the project census tract and surrounding area. The negative environmental, health, and quality of life impacts of the warehousing and logistics industry in Moreno Valley have become distinctly inequitable. The severity of environmental impacts particularly on these Disadvantaged Communities must be included for analysis as part of a revised EIR.

The State of California lists three approved compliance modeling softwares<sup>18</sup> for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software.

Regarding consistency with applicable adopted plans and policies, the EIR excludes from its analysis the project's required General Plan Amendment and Specific Plan Amendment to change the land use designations of the project site from Commercial to Business Park/Light Industrial to facilitate industrial development. The site was not anticipated to be developed with industrial development and is therefore not currently accounted for in regional and local plans adopted for purposes of avoiding or mitigating environmental effects, including the AQMP, RTP/SCS, and General Plan. The EIR must be revised to include this information for analysis and include a finding of significance.

The EIR states that, "The change in General Plan Land Use proposed by the Project (from Commercial to Light Industrial/Business Park) would likely result in a net reduction in total criteria

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<sup>17</sup> OEHHA SB 535 Census Tracts <https://oehha.ca.gov/calenviroscreen/sb535>

<sup>18</sup> California Energy Commission 2022 Energy Code Compliance Software  
<https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1>



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air pollutant emissions. This is due primarily to the net reduction in traffic and mobile-source air pollutant emissions that would be generated by the Project light industrial uses when compared to traffic and mobile-source emissions that would result from commercial development of the subject site.” However, this analysis on its face does not account for trip reductions associated with local-serving retail uses that are currently permitted on the project site. The EIR relies upon the general notion that commercial uses generate higher ADT than industrial uses to conclude that, “impacts resulting from the Project would not exceed assumptions reflected in the RTP/SCS. Moreover, the Project is not of a type, or of sufficient scope or scale to be considered regionally significant under CEQA, and would not discernibly affect regional goals and policies established under the RTP/SCS. Based on the preceding discussion, the Project is determined to be consistent with the RTP/SCS.” SCAG’s RTP/SCS is based upon the adopted General Plan of each jurisdiction. The project’s required General Plan Amendment and Change of Zone demonstrate that the project is not consistent with SCAG’s adopted RTP/SCS, removing commercial zoned land in the immediate vicinity of residential zoned land will increase VMT among residents and will impede the RTP/SCS’ goals to reduce VMT and GHG emissions. The EIR has not provided any meaningful evidence to support a less than significant finding and a finding of significance must be included as part of a revised EIR.

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### 5.3 Growth-Inducing Impacts of the Proposed Action

The EIR utilizes misleading language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impact to population and housing. The EIR states that, “Project job creation would not exceed employment projections developed under the General Plan. Growth resulting from Project job creation is anticipated under the General Plan, and such growth would not result in environmental impacts not already considered and addressed in the General Plan EIR.” This is notably untrue as the horizon year of the City’s applicable General Plan is 2020 and the project is proposed five years beyond the horizon year. Any development beyond year 2020 is not accounted for or analyzed by the City’s current General Plan and its EIR. The project is therefore not accounted for in its growth projections or environmental analysis. The EIR has not provided any information or analysis regarding the buildout conditions of the existing General Plan that it attempts to tier from. The EIR is inadequate as an informational document since the horizon year of the General Plan has passed and it has not provided a cumulative analysis of all Business Park/Light Industrial projects approved since the General Plan update analysis began in 2001. Further, the EIR also excludes from its analysis the project’s required General Plan Amendment and Change of Zone applications to allow development of industrial uses on the project site. The site was not anticipated to be developed with industrial development and is therefore not currently accounted for in regional and local plans adopted for purposes of avoiding or mitigating environmental effects, including the

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AQMP, RTP/SCS, and General Plan. A finding of significance must be included because the project is not accounted for in the General Plan growth projections and is beyond the 2020 horizon year analyzed in the General Plan and its EIR<sup>19</sup>. A revised EIR must also not tier from the General Plan EIR for this reason.

The EIR has excluded for discussion for the precedence setting action that approval of the required General Plan Amendment and Change of Zone sets for future changes in the area. The EIR must be revised to include a finding of significance as the required General Plan Amendment and Change of Zone to implement the project will set precedent for approval of other similar applications that will facilitate growth not accounted for in local and regional plans, including the AQMP, RTP/SCS, and General Plan. This is a precedent-setting action that will encourage and facilitate other activities that will significantly affect the environment individually and cumulatively. This analysis is not “speculative” because the project changes the character of the area to higher intensity industrial rather than local-serving retail that can reduce VMT.

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### Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

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Sincerely,



Vashon Simien  
Blum, Collins & Ho, LLP

Attachments:

1. SWAPE Technical Analysis

<sup>19</sup> Moreno Valley 2006 General Plan and EIR [https://www.moreno-valley.ca.us/city\\_hall/general-plan.html](https://www.moreno-valley.ca.us/city_hall/general-plan.html)

Blum Collins & Ho LLP  
707 Wilshire Boulevard, Suite 4880  
Los Angeles, CA 90017

Letter (submitted via email) dated February 27, 2025

**Comment BCH-1**

*Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Moreno Valley Business Park Building 5 Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.*

**Response BCH-1**

The Lead Agency recognizes comments provided on behalf of Golden State Environmental Justice Alliance (GSEJA). As requested, GSEJA will be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Commenter contact information is noted.

Findings and conclusions of the EIR are not affected.

**Comment BCH-2**

***1.0 Summary***

*The project proposes the construction and operation of one 220,390 square foot (sf) industrial warehouse building consisting of 33,060 sf of manufacturing use, 33,060 sf of high-cube cold storage use, and 154,270 sf of general (non-high cube) warehousing use on a 9.98 acre site. The following discretionary actions are required to implement the proposed project:*

1. PEN23-0092 (*Specific Plan Amendment No. 2*) amends the *Specific Plan No. 205 Land Use Plan* for the properties (approximately 9.98 acres) excluded under *Specific Plan No. 205 Amendment No. 1*. The Project would change the *Specific Plan Land Use* for these 9.98 acres from “*Commercial/Retail*” to “*Mixed of Uses*,” enabling the development of up to 220,390 square feet of light industrial uses (see Figure 2).
2. PEN23-0042 (*Plot Plan*) allows the construction of an approximate 220,309 square-foot industrial tilt-up building at the southeast corner of Ironwood Avenue at Heacock Street.
3. PEN24-0167 (*General Plan Amendment*) redesignating the Project Site’s *General Plan Land Use* from “*Commercial*” to “*Business Park/Light Industrial*”

### **Response BCH-2**

Commenter summary description of the Project is materially correct. Please refer to the detailed description presented in EIR Section 3.0, *Project Description*.

Findings and conclusions of the EIR are not affected.

### **Comment BCH-3**

#### ***1.1 Project Piecemealing***

*The EIR does not accurately or adequately describe the project, meaning “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment” (CEQA § 15378). The proposed project is a piecemealed portion of a larger overall project to be developed by Ledo Capital Group within the City.*

*The EIR misleads the public and decision makers by circumventing adequate and accurate environmental analysis for the whole of the action - construction and operation of all Ledo Capital Group buildings as a whole. At minimum, piecemealed projects include the development of 425,000 square feet of warehouse/industrial buildings facilitated by associated land use changes (Resolution No. 2018-0171 for General Plan Amendment (PEN16-0013), Ordinance No. 9372 for Change of Zone (PEN16-0014), and Ordinance No. 9353 amending SP 205 (PEN16-0015)).*



*Notably, Resolution No. 2018-017 states that the project resulted in significant and unavoidable impacts to Air Quality, Greenhouse Gas/Global Climate Change, Land Use/Planning and Traffic/Transportation.*

*A project EIR must be prepared that accurately represents the whole of the action without piecemealing the project into separate, smaller development projects to present unduly low environmental impacts. CEQA Section 15161 describes project EIRs as examining “the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.” The specific development project is the construction and operation of all Ledo Capital Group buildings and redevelopment within the Festival Specific Plan area.*

*Additionally, CEQA Section 15146 requires that the degree of specificity in an EIR “will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.”*

*Because there are multiple proposed buildings as part of a single project, the project EIR must be more detailed in the specific effects of the project. A project EIR must be prepared that accurately represents the whole of the action without piecemealing the project into separate, smaller development projects or development areas to present unduly low environmental impacts.*

### **Response BCH-3**

The commenter asserts that piecemealing of the Project has occurred. The Lead Agency disagrees. The Project is a distinct action requiring its own discretionary actions. The commenter asserts that individual development applications that may have the same applicant comprise a single larger project. The Lead Agency disagrees. To the extent the Project would interact with other related projects, those impacts have been adequately and accurately evaluated at EIR Section 5, *Cumulative Impact Analysis*.

The commenter continues, citing various CEQA requirements. These requirements are not germane to the Project, its potential impacts and requested discretionary actions.

Findings and conclusions of the EIR are not affected.

#### **Comment BCH-4**

##### ***3.0 Project Description***

*The EIR does not include a detailed floor plan, site plan, building elevations, or a grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. The EIR does not provide any grading plan or information regarding the quantity of import/export material associated with project construction or site preparation. Verification of the import/export materials is vital as it directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. There are also no building elevations provided to verify building height, paint colors, or materials. The site plan included in Figure 1.3-1: Site Plan Concept has been edited to remove pertinent information from public review, such as the construction notes, zoning conformance matrix (FAR, development standard compliance, etc.), and site data. A revised EIR must be prepared to include wholly accurate and adequate detailed project site plan, floor plan, grading plan, elevations, and project narrative for public review.*

#### **Response BCH-4**

The commenter asserts that additional Project details are required. The Lead Agency disagrees. The EIR Project Description complies with CEQA *Guidelines* requirements: Project Location, Objectives, general descriptions of relevant technical, economic, and environmental characteristics and intended uses(s) of the EIR (see EIR Section 3.0, *Project Description*; EIR Section 2.8, *Intended Use of this EIR*). The *Guidelines* emphasize that project descriptions should avoid “extensive detail beyond that needed for evaluation and review of the environmental impact.” For the benefit of the commenter, Project plans providing additional detail are presented at FEIR Figure 1.

Findings and conclusions of the EIR are not affected.

**Comment BCH-5****1.9.12 Impacts Not Found to be Potentially Significant: Population and Housing**

*The EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impact to population and housing. The EIR states that “Project-related employment demands would likely be filled by the existing personnel pool within the City and neighboring communities, with little or no measurable increase in the City resident population.” Notably, the geographic distance of “neighboring communities” is undefined. Relying on the workforce population of the entire Inland Empire region will increase project related VMT. Additionally, the EIR assumes that the region has an adequate personnel pool without providing any meaningful evidence to support this claim, such as the unemployed workforce’s interest in or qualifications for work in the industrial sector. The EIR has not provided any meaningful evidence to support a less than significant finding and must be revised to including a finding of significance.*

*The EIR also states that, “Significant population growth is therefore not anticipated to occur as a direct result of Project implementation.” However, the EIR excludes from its analysis the project’s required General Plan Amendment and Specific Plan Amendment to change the land use designations of the project site from Commercial to Business Park/Light Industrial to facilitate industrial development. The EIR has not provided any meaningful evidence to support a less than significant finding and must be revised to including a finding of significance.*

*The EIR has not provided a cumulative analysis discussion of approved projects and projects “in the pipeline” to quantify the City’s progress towards its General Plan buildout scenario and/or SCAG’s employment growth forecast. SCAG’s Connect SoCal Demographics and Growth Forecast<sup>4</sup> notes that the City will add 38,700 jobs between 2019 - 2050. Utilizing the EIR’s calculation of 214 employees, the project represents 0.55% of the City’s employment growth from 2019 - 2050. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2019 and projects “in the pipeline” to determine if the project will exceed SCAG’s employment growth forecast for the City. For example, other recent industrial projects such as Old 215 Business Park (345 employees), Compass Danbe Centerpointe Warehouse (677 employees), Cottonwood and Edgemont (175 employees), World Logistics Center (20,300 direct jobs plus 7,386 indirect/induced jobs in the County (3,693 jobs*

*induced within City) total jobs in city = 23,993), Bay and Day Commerce Center (163 employees), and piecemealed industrial development in SP 205 (425,000 sf; 413 employees) combined with the proposed project will cumulatively generate 25,980 employees, which is 67.1% of the City's employment growth forecast over 31 years accounted for by only a few recent industrial projects. This number increases exponentially when the City's commercial development activity and other industrial development is added to the calculation. A revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved and "in the pipeline" to evaluate the City's progress towards General Plan buildout capacity and SCAG's forecasts.*

#### **Response BCH-5**

The commenter asserts that the Project would result in potentially significant population and housing impacts. The Lead Agency disagrees. Commenter statements here lack evidentiary support. The project does not propose or require housing. Nor would the Project displace housing. Persons desiring Project employment either live in the City, or would commute. There is no indication that the potential 214 jobs created by the Project would somehow result in housing demands that would create significant environmental impacts. Moreover, as noted by the commenter, the Project proposes a General Plan Amendment and Specific Plan Amendment to change the land use designations of the Project site from Commercial to Business Park/Light Industrial. The proposed change in land use would result in an overall decreased intensity and demand for housing compared to that anticipated in the General Plan and General Plan EIR. Potential housing demands of the Project are already reflected in the City's adopted planning documents. See also a comparison of the Project Alternative and No Project Alternative-Commercial Development Scenario presented in EIR Section 5.2, *Alternatives Analysis*.

Findings and conclusions of the EIR are not affected.

#### **Comment BCH-6**

##### ***4.1 Land Use Planning***

*The EIR has not provided analysis of the project in accordance with the required findings for approval of a General Plan Amendment as stated in Moreno Valley Municipal Code Section*

9.02.040. Section 9.02.040(H) specifically requires the following determinations be made for approval:

1. "The proposed amendment is consistent with existing goals, objectives, policies and programs of the general plan;
2. The proposed amendment will not adversely affect the public health, safety or general welfare; and
3. The proposed amendment will provide public benefits to the general community beyond those that may be unilaterally imposed by the city through the traditional exaction process, which will enhance public safety services, promote public health, increase recreational opportunities, improve general community services for children and/or seniors or otherwise improve the quality of life of the residents of the city."

Section 9.02.040(I) specifically states that public benefits, "shall include, but not be limited to, benefits afforded by a general plan amendment applicant, in lieu of those that may be unilaterally imposed by the city through the traditional exaction process, that shall remain a legal obligation of successors in interest, which the city council determines will enhance public safety services, promote public health, increase recreational opportunities, improve general community services for children and/or seniors or otherwise improve the quality of life of the residents of the city, which shall be memorialized in a legally enforceable agreement or other instrument or imposed as voluntarily-accepted conditions of approval subject to the review and approval as to legal form by the city attorney." The EIR has not provided any information regarding the project's compliance with these Municipal Code Sections and is inadequate as an informational document. The EIR must be revised to include information and analysis with all applicable sections of the Moreno Valley Municipal Code, including the required findings for approval of a General Plan Amendment application.

The EIR has not provided analysis of the project in accordance with the required findings for approval of a Specific Plan Amendment as stated in Moreno Valley Municipal Code Section 9.13. Section 9.13.090 specifically requires the following determinations be made for approval:

- A. "The proposed specific plan or the amendment is consistent with existing goals, objectives, policies and programs of the general plan;

*B. The proposed specific plan or the amendment will not adversely affect the public health, safety or general welfare; and*

*C. The proposed specific plan or the amendment will provide public benefits to the general community beyond those that may be unilaterally imposed by the city through the traditional exaction process, which will enhance public safety services, promote public health, increase recreational opportunities, improve general community services for children and/or seniors or otherwise improve the quality of life of the residents of the city.”*

*Section 9.13.100 specifically states that public benefits, “shall include, but not be limited to, benefits afforded by a specific plan or specific plan amendment applicant, in lieu of those that may be unilaterally imposed by the city through the traditional exaction process, that shall remain a legal obligation of successors in interest, which the city council determines will enhance public safety services, promote public health, increase recreational opportunities, improve general community services for children and/or seniors or otherwise improve the quality of life of the residents of the city, which shall be memorialized in a legally enforceable agreement or other instrument or imposed as voluntarily-accepted conditions of approval subject to the review and approval as to legal form by the city attorney.” The EIR has not provided any information regarding the project’s compliance with these Municipal Code Sections and is inadequate as an informational document. The EIR must be revised to include information and analysis with all applicable sections of the Moreno Valley Municipal Code, including the required findings for approval of a Specific Plan Amendment application.*

*Further, it must be noted that the horizon year of the City’s current General Plan is 2020. Any development beyond year 2020 is not accounted for or analyzed by the City’s current General Plan and its EIR. The project is proposed five years after the horizon year of the General Plan and therefore is not accounted for in its growth projections or environmental analysis. The EIR has not provided any information or analysis regarding the buildout conditions of the existing General Plan that it attempts to tier from. The EIR is inadequate as an informational document since the horizon year of the General Plan has passed and it has not provided a cumulative analysis of all Business Park/Light Industrial projects approved since the General Plan update analysis began in 2001. Further, the EIR also excludes from its analysis the project’s required General Plan Amendment and Change of Zone applications to allow development of industrial uses on the*



*project site. The site was not anticipated to be developed with industrial development and is therefore not currently accounted for in regional and local plans adopted for purposes of avoiding or mitigating environmental effects, including the AQMP, RTP/SCS, and General Plan. The EIR must be revised to include this information for analysis and include a finding of significance. A finding of significance must also be included because the project is not accounted for in the General Plan growth projections and is beyond the 2020 horizon year analyzed in the General Plan and its EIR. A revised EIR must also not tier from the General Plan EIR for this reason.*

*The EIR does not include a consistency analysis with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, such as the General Plan. The EIR is inadequate as an informational document and a revised EIR must be prepared with a consistency analysis with all General Plan policies, including the following:*

- 1. Goal 2.1 A pattern of land uses, which organizes future growth, minimizes conflicts between land uses, and which promotes the rational utilization of presently underdeveloped and undeveloped parcels.*
- 2. Goal 2.2 An organized, well-designed, high quality, and functional balance of urban and rural land uses that will meet the needs of a diverse population, and promote the optimum degree of health, safety, well-being, and beauty for all areas of the community, while maintaining a sound economic base.*
- 3. Objective 2.10 Ensure that all development within the City of Moreno Valley is of high quality, yields a pleasant living and working environment for existing and future residents, and attracts business as the result of consistent exemplary design.*
- 4. Policy 2.10.1 Encourage a design theme for each new development that is compatible with surrounding existing and planned developments.*
- 5. Policy 2.10.3 Require exterior elevations of buildings to have architectural treatments that enhance their appearance: a. A design theme, with compatible materials and styles should be evident within a development project; b. Secondary accent materials, colors and lighting should be used to highlight building features; c. Variations in roofline and setbacks (projections and recesses) should be used to break up the building mass. d. Industrial buildings shall include architectural treatments on visible facades that are aesthetically pleasing.*
- 6. Policy 5.1.1 Plan access and circulation of each development project to accommodate vehicles (including emergency vehicles and trash trucks), pedestrians, and bicycles.*

7. Policy 5.1.2 Plan the circulation system to reduce conflicts between vehicular, pedestrian and bicycle traffic.
8. Policy 5.1.3 Require adequate off-street parking for all developments.
9. Policy 5.1.4 Driveway placement shall be designed for safety and to enhance circulation wherever possible.
10. Policy 5.1.6 Design new developments to provide opportunity for access and circulation to future adjacent developments.
11. Objective 5.3 Maintain Level of Service (LOS) "C" on roadway links, wherever possible, and LOS "D" in the vicinity of SR 60 and high employment centers. Figure 9-2 depicts the LOS standards that are applicable to all segments of the General Plan Circulation Element Map.
12. Policy 5.5.7 For developments fronting both sides of a street, require that streets be constructed to full width. Where new developments front only one side of a street, require that streets be constructed to half width plus an additional 12-foot lane for opposing traffic, whenever possible. Additional width may be needed for medians or left and/or right turn lanes.
13. Policy 5.5.10 Provide adequate sight distances for safe vehicular movement at all intersections and driveways.

### **Response BCH-6**

The commenter asserts that the EIR analysis of Land Use and Planning is somehow deficient. The Lead Agency disagrees. The commenter lists various findings the City would make if the decision is made to approve the Project and certify the EIR. These findings are noted. As provided for under CEQA, the EIR provides information available to the decision-makers allowing for informed determinations regarding the Project's potential environmental effects. Please refer to the EIR in total.

The commenter asserts the Project would somehow result in growth and related impacts that are not reflected in the General Plan and regional plans. As discussed in the EIR, the Project would actually result in decreased impacts when compared to the commercial uses that are allowed under the site's current General Plan Commercial Land Use designation. The General Plan is the basis for adopted regional plans. By extension, the Project would not conflict with or obstruct regional plans. It is noted further that the

Project is not regionally significant as defined under CEQA,<sup>14</sup> and would therefore not otherwise substantially affect or conflict with regional plans.

See also a comparison of the Project Alternative and No Project Alternative-Commercial Development Scenario presented in EIR Section 5.2, *Alternatives Analysis*.

Findings and conclusions of the EIR are not affected.

### **Comment BCH-7**

#### ***4.2 Transportation***

*The EIR improperly “screens out” the project from performing a project-specific LOS analysis. Appendix C: Transportation Analysis Scoping Agreement states that the, “Project generates less than 100 peak hour trips (both actual vehicles and PCE),” in an effort to artificially appease the City’s Traffic Impact Analysis Guidelines<sup>8</sup> that exempts projects generating less than 100 peak hour trips from providing a complete LOS analysis. However, the project analyzed by the EIR provides a very specific mix of uses inside a single building - 33,060 sf of manufacturing use, 33,060 sf of high-cube cold-storage use, and 154,270 sf of general (non-high cube) warehousing use. The EIR does not provide any mitigation measures or note that conditions of approval exist to require all future tenants to adhere to this specific mix of uses during their operation. The EIR has clearly chosen this specific quantity and mix of internal uses in order to artificially skew impacts downwards to avoid several thresholds of significance. As an example, the EIR has not evaluated the quantity of peak hour trips generated if the entirety of the building is utilized as a high-cube warehouse, meaning that any future tenant that operates with any mix of uses other than those specified in the EIR has the potential to generate significant impacts. If the mix of uses were to be included as mitigation or conditions of approval, it would not be feasible mitigation as it is not possible for the lead agency to ensure that the specific mix of uses by square footage will be adhered to at all times throughout the life of the project. There is no reasonable assurance that the project operations will generate less than 100 peak hour trips at all times throughout the life of the project, and the project’s impact is therefore considered significant and unavoidable.*

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<sup>14</sup>See: CEQA Guidelines Section 15206, *Projects of Statewide, Regional, or Areawide Significance*.

*Further, the EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a warehouse, which will drastically increase project generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project's actual VMT generated is further inconsistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.*

*The EIR also excludes any input/output sheets related to analyzing VMT utilizing RIVTAM. The input parameters utilized for analysis and subsequent outputs generated by RIVTAM contribute directly to analysis of the problem at hand and must be included in a revised EIR in order to comply with CEQA's requirements for meaningful disclosure and incorporation (CEQA § 15150 (f)).*

*The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site or the maneuvering area available at the intersection of the project driveways and adjacent street.*

*The EIR states that, "The final design of the Project site plan and all Project traffic improvements would be subject to review and approval by the City, thereby ensuring conformance of the Project improvements with City design and safety standards," and that, "Efficient and safe access within, and access to, the Project is provided by the site plan design concept, site access improvements, and site adjacent roadway improvements included as components of the Project. On-site traffic signing and striping would be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point would be reviewed to ensure conformance with City sight distance standards at the time of preparation of final grading, landscape and street improvement plans."*

*This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). The EIR has not provided any details regarding the City's design and safety standards or City sight distance standards for the items listed above and/or road development, stacking distances, lines of sight, or meaningful analysis of the project's compliance or noncompliance with these requirements. The EIR makes the sweeping conclusion that "Efficient and safe access within, and access to, the Project is provided by the site plan design concept," but there is no analysis of the site plan design concept to support this statement. Deferring this required environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include a finding of significance as the EIR has not provided any meaningful evidence to support a less than significant finding.*

*The EIR states regarding emergency access that, "...representatives of the Moreno Valley Police Department and Moreno Valley Fire Department would review the Project's plans to ensure that emergency access is provided consistent with Department(s) requirements." This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). The EIR has not provided any details regarding the requirements for emergency access or meaningful analysis of the project's compliance or noncompliance with these requirements. Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include a finding of significance as the EIR has not provided any meaningful evidence to support a less than significant finding.*

### **Response BCH-7**

The commenter asserts the EIR transportation analysis is somehow deficient. The commenter offers no evidentiary support for the comments. The Lead Agency disagrees with the commenter statements. By commenter topic:

## **LOS**

There is no requirement for an LOS analysis (EIR Section 4.2, *Transportation*, EIR Appendix C, *Transportation Analysis*). See also Response DOT-2.

## **VMT**

Project VMT impacts are substantiated to be less-than-significant (EIR Section 4.2, *Transportation*, EIR Appendix C, *Transportation Analysis*).

## **Hazards/Access**

Potential traffic/transportation hazards are substantiated to be less-than-significant. The City requires that all transportation improvements comply with accepted transportation engineering standards. See: <https://www.moreno-valley.ca.us/departments/public-works/standards/2022-Std-Plans-10-2024.pdf>.

Project compliance with City design standards is mandatory. Interested parties can access City regulations by contacting the City or via the City website. A link to City review and process is provided at EIR, p. 4.1-12 and is reproduced here: <https://www.moreno-valley.ca.us/cdd/documents/approval-process.html>.

There is no indication that the Project would interfere with or substantially obstruct emergency access. The project does not propose or require unsafe designs. The Project incorporates construction traffic management measures ensuring adequate access to the Project site and vicinity properties is maintained throughout Project construction activities. Standard City review processes ensure that all final designs comply with mandated design and safety standards (EIR pp. 1-6, 1-7, 1-24,3-14, 4.2-11, 4.1-14, 4.2-15, et al). See also Response DOT-2.

Findings and conclusions of the EIR are not affected.

## **Comment BCH-8**

***4.3 Air Quality, 4.4 Greenhouse Gas Emissions/Global Climate Change, and 4.5 Energy***

*The project analyzed by the EIR provides a very specific mix of uses inside a single building -*



33,060 sf of manufacturing use, 33,060 sf of high-cube cold-storage use, and 154,270 sf of general (non-high cube) warehousing use. The EIR does not provide any mitigation measures or note that conditions of approval exist to require all future tenants to adhere to this specific mix of uses during their operation. The EIR has clearly chosen this specific quantity and mix of internal uses in order to artificially skew impacts downwards to avoid several thresholds of significance. As an example, the EIR has not evaluated the Air Quality, GHG, or Energy impacts if the entirety of the building is utilized as a high-cube warehouse, meaning that any future tenant that operates with any mix of uses other than those specified in the EIR has the potential to generate significant impacts. If the mix of uses were to be included as mitigation or conditions of approval, it would not be feasible mitigation as it is not possible for the lead agency to ensure that the specific mix of uses by square footage will be adhered to at all times throughout the life of the project. There is no reasonable assurance that the project operations will generate less than significant impacts to Air Quality, GHG, and Energy at all times throughout the life of the project, and the project's impacts are therefore considered significant and unavoidable.

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. The EIR provides general information about the census tract's CalEnviroScreen scores but does not provide meaningful analysis regarding the health impacts and effects of severe pollution rates. This is in conflict with CEQA Guidelines Section 15131 (c), which requires that "Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project." This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.09, CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6065042404) ranks worse than 69% of the rest of the state overall in overall pollution burden applied to the socioeconomic factors of the population. The surrounding community bears the impact of multiple sources of pollution and is amongst the most severely polluted census tracts for many pollution indicators measured by CalEnviroScreen. For example, the project census tract ranks in the 99<sup>th</sup>

percentile for ozone burden, 61st percentile for particulate matter (PM) 2.5 burden, 86th percentile for diesel PM burden, and 60th percentile for traffic burdens. All of these environmental factors are typically attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure. The very small particles of diesel PM can reach deep into the lung, where they can contribute to a range of health problems. These include irritation to the eyes, throat and nose, heart and lung disease, and lung cancer.

The census tract also bears more impacts from cleanup sites than 58% of the state. Chemicals in the buildings, soil, or water at cleanup sites can move into nearby communities through the air or movement of water. The census tract also ranks in the 59th percentile for impacts from toxic releases. People living near facilities that emit toxic releases may breathe contaminated air regularly or if contaminants are released during an accident.

Further, the census tract is a diverse community including 69% Hispanic and 6% African-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 79% of the census tract over age 25 has not attained a high school diploma. The community also has a high rate of poverty, meaning 81% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care. Poor communities are often located in areas with high levels of pollution. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 70th percentile for incidence of cardiovascular disease and 56th percentile for incidence of asthma. The community also has a high rate of linguistic isolation, meaning 61% of the census tract speaks little to no English and faces further inequities as a result.

Additionally, the proposed project's census tract (6065042404) and the census tracts adjacent to the project site (6065042519 (south/southeast), 6065042515 (south/southwest), and 6065042405 (west)) are identified as SB 535 Disadvantaged Communities. This indicates that cumulative impacts of development and environmental impacts in the City are disproportionately impacting

*these communities. The EIR does not discuss that the project site and surrounding area are disadvantaged communities and does not utilize this information in its analysis. The EIR has not considered the environmental impacts in relation to the SB 535 status of the project census tract and surrounding area. The negative environmental, health, and quality of life impacts of the warehousing and logistics industry in Moreno Valley have become distinctly inequitable. The severity of environmental impacts particularly on these Disadvantaged Communities must be included for analysis as part of a revised EIR.*

*The State of California lists three approved compliance modeling softwares for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software.*

*Regarding consistency with applicable adopted plans and policies, the EIR excludes from its analysis the project's required General Plan Amendment and Specific Plan Amendment to change the land use designations of the project site from Commercial to Business Park/Light Industrial to facilitate industrial development. The site was not anticipated to be developed with industrial development and is therefore not currently accounted for in regional and local plans adopted for purposes of avoiding or mitigating environmental effects, including the AQMP, RTP/SCS, and General Plan. The EIR must be revised to include this information for analysis and include a finding of significance.*

*The EIR states that, "The change in General Plan Land Use proposed by the Project (from Commercial to Light Industrial/Business Park) would likely result in a net reduction in total criteria air pollutant emissions. This is due primarily to the net reduction in traffic and mobile source air pollutant emissions that would be generated by the Project light industrial uses when*

*compared to traffic and mobile-source emissions that would result from commercial development of the subject site.” However, this analysis on its face does not account for trip reductions associated with local-serving retail uses that are currently permitted on the project site. The EIR relies upon the general notion that commercial uses generate higher ADT than industrial uses to conclude that, “impacts resulting from the Project would not exceed assumptions reflected in the RTP/SCS. Moreover, the Project is not of a type, or of sufficient scope or scale to be considered regionally significant under CEQA, and would not discernibly affect regional goals and policies established under the RTP/SCS. Based on the preceding discussion, the Project is determined to be consistent with the RTP/SCS.” SCAG’s RTP/SCS is based upon the adopted General Plan of each jurisdiction. The project’s required General Plan Amendment and Change of Zone demonstrate that the project is not consistent with SCAG’s adopted RTP/SCS, removing commercial zoned land in the immediate vicinity of residential zoned land will increase VMT among residents and will impede the RTP/SCS’ goals to reduce VMT and GHG emissions. The EIR has not provided any meaningful evidence to support a less than significant finding and a finding of significance must be included as part of a revised EIR.*

### **Response BCH-8**

The commenter asserts that the EIR GHG and Energy analyses are somehow deficient. The Lead Agency disagrees. The commenter states that the analysis is “skewed.” This is incorrect. Assumptions and analyses employed in the EIR comprise a potential maximum impact scenario. Assumptions and analyses are based on the best available information. All analyses have been performed by experts in their fields consistent with accepted professional standards and best practices. Commenter qualifications in these regards are unclear. Detailed analysis and substantiation is presented at EIR Section 4.4, *Greenhouse Gas Emissions/Climate Change*; EIR Section 4.5, *Energy*; EIR Appendix E, *Greenhouse Gas Analysis*; and EIR Appendix F, *Energy Assessment*.

The commenter speculates that the developed site would differ substantially from the Project described in the EIR. The commenter provides no evidentiary support for these speculative statements. As specifically noted in the EIR “Analyses within this EIR reflect the Project design and development concepts summarized at EIR Section 3.0, Project Description. Should future development proposals differ substantially from the

development concepts analyzed herein, the Lead Agency would comply with CEQA in consideration of those proposals” (EIR, p. 4.1-3). In this manner, the Lead Agency would ensure that the developed site would not result in effects substantially different from those presented in the EIR. With regard to Conditions of Approval suggested by the commenter, the DEIR and Responses provided herein substantiate that all Project impacts would be less-than-significant or less-than-significant as mitigated. The Lead Agency may impose Conditions of Approval it deems appropriate.

Commenter statements regarding environmental justice (EJ) are noted. CEQA focuses on physical environmental impacts rather than EJ issues. Analyses presented in the EIR substantiate that the Project would not result in any significant impacts, and therefore would not result in significant environmental impacts that would disproportionately affect EJ communities.

Commenter lists various energy modeling protocols. Commenter assertions regarding appropriate and accepted energy modeling protocols are incorrect and unsupported by evidence. The commenter asserts that CalEEMod modeling employed in the EIR is “not listed as an approved software” and therefore the EIR modeling of and conclusions regarding the Project energy impacts and fuel consumption are somehow flawed. The Lead Agency disagrees.

First, CEQA does not mandate that certain tools or modeling protocols be employed in environmental analysis such as is suggested by the commenter. CEQA requires only that analyses be sufficient to provide decision-makers with information enabling them to make decisions that intelligently account of environmental consequences of projects (*CEQA Guidelines* §15151. STANDARDS OF SIGNIFICANCE). Regarding air quality impact and related energy consumption modeling, the EIR Air Quality Impact Analysis (AQIA, EIR Appendix D), EIR Energy Assessment (EIR Appendix F), EIR Section 4.3, *Air Quality*, and EIR Section 4.5, *Energy* provide such sufficient information.

Regarding use of CalEEMod for the purposes of modeling energy consumption, the Lead Agency has historically and successfully employed CalEEMod for this purpose. Further,

the SCAQMD, the Responsible Agency for air quality considerations, sanctions use of CalEEMod to provide a “uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operational from a variety of land use projects.”<sup>15</sup> Through the use of CalEEMod, SCAQMD integrates air quality and energy impact analyses. To ensure consistency of and accuracy of analyses in support of SCAQMD policies, the Lead Agency has determined that CalEEMod is appropriate for CEQA modeling of both air quality impacts and energy consumption. Note further, the energy modeling protocols cited by the commenter (CBECC-Com, EnergyPro, and IES VE) provide modeling of building energy consumption only, whereas CalEEMod comprehensively and cohesively provides building energy consumption estimates, as well as establishes the basis for estimating construction activity/construction equipment energy consumption, and mobile-source (vehicular) energy consumption. This latter category (vehicular energy consumption) comprises the majority of Project energy demand. If anything, the energy modeling protocols offered by the commenter (which do not consider energy consumption attributable to construction activities or mobile sources) would vastly underestimate the Project energy demands and Project energy consumption. The EIR analysis accurately estimates the Project energy demands, and substantiates that all Project energy impacts would be less-than-significant.

Findings and conclusions of the EIR are not affected.

### **Comment BCH-9**

#### ***5.3 Growth-Inducing Impacts of the Proposed Action***

*The EIR utilizes misleading language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impact to population and housing. The EIR states that, “Project job creation would not exceed employment projections developed under the General Plan. Growth resulting from Project job creation is anticipated under the General Plan, and such growth would not result in environmental impacts not already*

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15 SCAQMD. (2024). Air quality modeling for CEQA. Retrieved from <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-modeling>



*considered and addressed in the General Plan EIR.” This is notably untrue as the horizon year of the City’s applicable General Plan is 2020 and the project is proposed five years beyond the horizon year. Any development beyond year 2020 is not accounted for or analyzed by the City’s current General Plan and its EIR. The project is therefore not accounted for in its growth projections or environmental analysis. The EIR has not provided any information or analysis regarding the buildout conditions of the existing General Plan that it attempts to tier from. The EIR is inadequate as an informational document since the horizon year of the General Plan has passed and it has not provided a cumulative analysis of all Business Park/Light Industrial projects approved since the General Plan update analysis began in 2001. Further, the EIR also excludes from its analysis the project’s required General Plan Amendment and Change of Zone applications to allow development of industrial uses on the project site. The site was not anticipated to be developed with industrial development and is therefore not currently accounted for in regional and local plans adopted for purposes of avoiding or mitigating environmental effects, including the AQMP, RTP/SCS, and General Plan. A finding of significance must be included because the project is not accounted for in the General Plan growth projections and is beyond the 2020 horizon year analyzed in the General Plan and its EIR<sup>19</sup>. A revised EIR must also not tier from the General Plan EIR for this reason.*

*The EIR has excluded for discussion for the precedence setting action that approval of the required General Plan Amendment and Change of Zone sets for future changes in the area. The EIR must be revised to include a finding of significance as the required General Plan Amendment and Change of Zone to implement the project will set precedent for approval of other similar applications that will facilitate growth not accounted for in local and regional plans, including the AQMP, RTP/SCS, and General Plan. This is a precedent-setting action that will encourage and facilitate other activities that will significantly affect the environment individually and cumulatively. This analysis is not “speculative” because the project changes the character of the area to higher intensity industrial rather than local-serving retail that can reduce VMT.*

### **Response BCH-9**

The commenter asserts that the Project would result in substantial growth inducement beyond that anticipated under the General Plan. The Lead Agency disagrees. This comment is addressed previously herein. Please refer to Responses 5, 6, 8.

Findings and conclusions of the EIR are not affected.

**Comment BCH-10**

***Conclusion***

*For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.*

**Response BCH-10**

The commenter states that the EIR is “flawed” and a revised EIR must be prepared. The Lead Agency disagrees. The Lead Agency considers information and analysis presented in the EIR sufficient to allow decision-makers to make a decision regarding the Project which takes into account the Project’s potential environmental consequences. GSEJA will be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for the Project. Commenter contact information is noted.

Findings and conclusions of the EIR are not affected.

Note: The attachment titled “SWAPE Technical Analysis” submitted by the commentor is appended to this Final EIR at Appendix A.

## **4.0 MITIGATION MONITORING PROGRAM**

## 4.0 MITIGATION MONITORING PROGRAM

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### 4.1 INTRODUCTION

To ensure that the mitigation measures contained in this EIR are properly implemented, a mitigation monitoring program has been developed pursuant to state law. This Mitigation Monitoring Program (MMP) identifies measures incorporated in the Project which reduce its potential environmental effects; the entities responsible for implementation and monitoring of mitigation measures; and timing for implementation of mitigation measures. As described in *CEQA Guidelines* §15097, this MMP employs both reporting on, and monitoring of, Project mitigation measures.

The objectives of the MMP are to:

- Assign responsibility for, and further proper implementation of mitigation measures;
- Assign responsibility for, and provide for monitoring and reporting of compliance with mitigation measures;
- Provide the mechanism to identify areas of noncompliance and need for enforcement action before irreversible environmental damage occurs.

Mitigation monitoring and reporting procedures incorporated in the Project are presented in the following Section 4.2. Specific mitigation measures incorporated in the Project, mitigation timing, and implementation and reporting/monitoring responsibilities are presented within this Section in Table 4.2-1.

## 4.2 MITIGATION MONITORING AND REPORTING

### **Mitigation Monitoring and Responsibilities**

As the Lead Agency, the City of Moreno Valley is responsible for ensuring full compliance with the mitigation measures adopted for the Project. The City shall monitor and report on all mitigation activities. Mitigation measures shall be implemented at different stages of development throughout the Project area. In this regard, the responsibilities for implementation have been assigned to the Lead and Responsible Agencies, Applicant or successor(s) in interest, Contractors, On-Site Monitors, or combinations thereof.

If during the course of Project implementation, any of the mitigation measures identified herein cannot be successfully implemented, the City shall be immediately informed, and the City shall then inform any affected responsible agencies. The City, in conjunction with any affected responsible agencies, shall then determine if modification to the Project is required and/or whether alternative mitigation is appropriate.

**Table 4.2-1: Mitigation Monitoring Program**

**General Note:** To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Section / MM No.	Mitigation Measure	Mitigation Timing/Remarks	Implementation Entity	Monitoring/ Reporting Entity	Date of Completion/ Initials
<b>4.7 Biological Resources</b>					
<b>4.7.1</b>	<p>4.7.1 To avoid impacts to nesting birds and to comply with the federal Migratory Bird Treaty Act of 1918 (MBTA):</p> <p>If possible, all vegetation removal activities shall be scheduled from August 1 to February 15, which is outside the nesting season. This would ensure that no active nests would be disturbed and that removal could proceed rapidly.</p> <p>If vegetation is to be cleared during the nesting season (February 15 – July 31), all suitable habitat shall be thoroughly surveyed for the presence of nesting birds by a qualified biologist 72 hours prior to clearing. If any active nests are detected, the area shall be flagged and mapped on the construction plans along with a minimum 50-foot buffer and up to 300 feet for raptors, with the final buffer distance to be determined by the qualified biologist. The buffer area shall be avoided until the nesting cycle is complete or it is determined that the nest has failed. In addition, the biologist shall be present on the site to monitor the vegetation removal to ensure that any nests, which were not detected during the initial survey, are not disturbed.</p>	Prior to site disturbing activities.	Applicant or successor(s) in interest; construction contractor(s); Project Biologist.	City of Moreno Valley; Project Biologist.	Prior to issuance of grading permits and throughout site disturbing activities.
<b>4.7.2</b>	Within 30 days prior to disturbance at the project site, a pre-construction survey shall be conducted for burrowing owl ( <i>Athene cunicularia</i> ). If owls are present, they shall be relocated following accepted protocols to comply with the MSHCP.	Prior to site disturbing activities.	Applicant or successor(s) in interest; construction contractor(s); Project Biologist.	City of Moreno Valley; Project Biologist.	Prior to issuance of grading permits and throughout site disturbing activities.
<b>4.7.3</b>	All temporary work areas, including stockpiles, shall be located outside any sensitive biological resources	Throughout site disturbing activities.	Applicant or successor(s) in interest; construction contractor(s); Project Biologist.	City of Moreno Valley; Project Biologist.	Throughout site disturbing activities.



**Table 4.2-1: Mitigation Monitoring Program**

**General Note:** To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Section / MM No.	Mitigation Measure	Mitigation Timing/Remarks	Implementation Entity	Monitoring/ Reporting Entity	Date of Completion/ Initials
4.7.4	<i>The limits of the work shall be flagged prior to start of work.</i>	Prior to site disturbing activities.	Applicant or successor(s) in interest; construction contractor(s); Project Biologist.	City of Moreno Valley; Project Biologist.	Prior to issuance of grading permits and throughout site disturbing activities.
<b>4.8 Cultural Resources</b>					
4.8.1	<p><i>Prior to the issuance of the first grading permit, the Applicant shall provide a letter to the City of Moreno Valley Planning Department, or designee, from a qualified professional archaeologist stating that they have been retained to provide on-call services in the event archaeological or historical resources are encountered.</i></p> <p><i>In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and the qualified archaeologist shall be contacted to assess the significance of the find. The qualified archaeologist would have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register, plans for the evaluation and treatment, evaluation of the find shall be developed.</i></p>	Prior to issuance of grading permits.	Applicant or successor(s) in interest; construction contractor(s); Project Archaeologist.	City of Moreno Valley; Project Archaeologist.	Prior to issuance of grading permits and throughout site disturbing activities.
4.8.2	<p><i>Prior to the issuance of the first grading permit, the Applicant shall provide a letter to the City of Moreno Valley Planning Department, or designee, from a qualified professional paleontologist (Project Paleontological Monitor) stating that the Project Paleontological Monitor has been retained to provide on-call services in the event paleontological resources are encountered.</i></p> <p><i>Should resources be discovered, the Project Paleontological Monitor shall develop an acceptable monitoring and fossil remains treatment plan (Paleontological Management Treatment Plan - PMTP) for construction-related activities that could disturb potential unique paleontological resources within the Project area. Minimum provisions of the PMTP are outlined below:</i></p>	Prior to issuance of grading permits.	Applicant or successor(s) in interest; construction contractor(s); Project Paleontological Monitor.	City of Moreno Valley; Project Paleontological Monitor.	Prior to issuance of grading permits and throughout site disturbing activities.

**Table 4.2-1: Mitigation Monitoring Program**

**General Note:** To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Section / MM No.	Mitigation Measure	Mitigation Timing/Remarks	Implementation Entity	Monitoring/ Reporting Entity	Date of Completion/ Initials
	<ul style="list-style-type: none"> <li>Paleontological monitoring shall be conducted during all grading and trenching operations. Monitoring shall be conducted intermittently during initial cuts until early Holocene or Late Pleistocene period deposits (if any) are encountered. Once (if) early Holocene or Late Pleistocene period deposits are identified, paleontological monitoring shall be conducted on a full-time basis.</li> <li>The Project Paleontological Monitor shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.</li> <li>Recovered specimens shall be prepared to a point of identification and permanent preservation, including screen-washing sediments to recover small invertebrates and vertebrates if indicated by the results of test sampling.</li> <li>All recovered fossils shall be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, shall be the responsibility of the developer(s).</li> <li>Within 60 days of completion of grading, excavation and ground-disturbing activities at the site, the Project Paleontological Monitor shall prepare a Final Mitigation and Monitoring Report (Final Report). The Final Report shall identify findings and significance of findings, including lists of all fossils recovered and necessary maps and graphics to accurately record their original</li> </ul>				

**Table 4.2-1: Mitigation Monitoring Program**

**General Note:** To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Section / MM No.	Mitigation Measure	Mitigation Timing/Remarks	Implementation Entity	Monitoring/ Reporting Entity	Date of Completion/ Initials
	location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution shall be included in the Final Report. The Final Report, when submitted to and accepted by the Lead Agency (City of Moreno Valley), shall signify satisfactory completion of mitigation of potential impacts to paleontological resources.				
<b>4.8.3</b>	Archaeological Monitoring. Prior to the issuance of a grading permit, the Project Applicant shall retain a professional archaeologist to conduct monitoring of all ground-disturbing activities. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Consulting Tribe(s) <sup>1</sup> including the Pechanga Band of Indians and the Morongo Band of Indians, the contractor, and the City, shall develop a CRMP as defined at Mitigation Measure 4.8.5. The Project archeologist shall attend the pre-grading meeting with the City, the construction manager, and any contractors and shall conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological resources are unearthed.	Prior to issuance of grading permits.	Applicant or successor(s) in interest; construction contractor(s);  City of Perris; Project Archaeologist; Native American Monitor.	City of Perris; Project Archaeologist; Native American Monitor.	Prior to issuance of grading permits and throughout site disturbing activities.
<b>4.8.4</b>	Native American Monitoring. Prior to the issuance of a grading permit, the Project Applicant shall secure agreements with the Pechanga Band of Indians and the Morongo Band of Mission Indians for tribal monitoring. The Project Applicant is also required to provide a minimum of 30 days advance notice to the Tribes of all ground-disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological resources are unearthed. The Native American Monitor(s) shall attend the pre-grading meeting with the	Prior to issuance of grading permits.	Applicant or successor(s) in interest; construction contractor(s);  City of Moreno Valley; Project Archaeologist; Native American Monitor.	City of Moreno Valley; Project Archaeologist; Native American Monitor.	Prior to issuance of grading permits and throughout site disturbing activities.

<sup>1</sup> A Consulting Tribe is defined as a Tribe that has initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the City as provided for at Cal Pub Res Code Section 21080.3.2(b)(1) of AB 52.

**Table 4.2-1: Mitigation Monitoring Program**

**General Note:** To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Section / MM No.	Mitigation Measure	Mitigation Timing/Remarks	Implementation Entity	Monitoring/ Reporting Entity	Date of Completion/ Initials
	Project Archaeologist, City, the construction manager, and any contractors and shall conduct the Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.				
4.8.5	<p>Cultural Resource Monitoring Plan (CRMP). The Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing, and responsibility of all archaeological and cultural monitoring activities that shall occur on the Project site. The CRMP shall include:</p> <ul style="list-style-type: none"> <li>a) Project description and location;</li> <li>b) Project grading and development scheduling;</li> <li>c) Roles and responsibilities of individuals on the Project;</li> <li>d) Pre-grading meeting and Cultural Resources Worker Sensitivity Training details;</li> <li>e) Protocols and stipulations that the contractor, City, Consulting Tribe (s) and Project archaeologist shall follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits subject to a cultural resources evaluation;</li> <li>f) The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items; and</li> <li>g) Contact information of relevant individuals for the Project.</li> </ul>	Prior to issuance of grading permits.	<p>Applicant or successor(s) in interest; construction contractor(s);</p> <p>City of Moreno Valley; Project Archaeologist; Native American Monitor.</p>	City of Moreno Valley; Project Archaeologist; Native American Monitor.	Prior to issuance of grading permits and throughout site disturbing activities.
4.8.6	<p>Cultural Resource Disposition. In the event that Native American cultural resources are encountered during the course of ground-disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:</p> <ul style="list-style-type: none"> <li>a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Department:</li> <li>i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving</li> </ul>	Throughout site disturbing activities.	<p>Applicant or successor(s) in interest; construction contractor(s);</p> <p>City of Moreno Valley; Project Archaeologist; Native American Monitor.</p>	City of Moreno Valley; Project Archaeologist; Native American Monitor.	Throughout site disturbing activities.

**Table 4.2-1: Mitigation Monitoring Program**

**General Note:** To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Section / MM No.	Mitigation Measure	Mitigation Timing/Remarks	Implementation Entity	Monitoring/ Reporting Entity	Date of Completion/ Initials
	<p>them in the place they were found with no development affecting the integrity of the resources.</p> <p>ii. Onsite reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure 4.8.6. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments. The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.</p> <p>Additionally, the City shall verify that the following note is included on all Grading Plans:</p> <p>"If any suspected archaeological resources are encountered during ground-disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."<sup>4</sup></p>				
4.8.7	<p>Inadvertent Finds. If previously unevaluated potential cultural resources are encountered during Project excavation or construction activities, all ground-disturbing activities within 100 feet of the encountered resource (the find) shall cease immediately. A qualified person meeting the Secretary of the Interior's standards (Code of Federal Regulations, Title 36, Section 61), Tribal Representatives, and all site monitors per these mitigation measures shall consult with the City to evaluate the find, and appropriate measures to avoid, minimize, or mitigate potential negative effects to the find shall be implemented. Further ground disturbance shall not resume within the area of the find (the buffer area) until an agreement has been reached by all parties as to the appropriate measures to be</p>	Throughout site disturbing activities.	<p>Applicant or successor(s) in interest; construction contractor(s);</p> <p>City of Moreno Valley; Project Archaeologist; Native American Monitor.</p>	City of Moreno Valley; Project Archaeologist; Native American Monitor.	Throughout site disturbing activities.

**Table 4.2-1: Mitigation Monitoring Program**

**General Note:** To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Section / MM No.	Mitigation Measure	Mitigation Timing/Remarks	Implementation Entity	Monitoring/ Reporting Entity	Date of Completion/ Initials
	<p>implemented. Determinations and recommendations regarding the agreed upon measures shall be immediately submitted to the Planning Division for consideration, and the agreed upon measures shall be implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic Preservation Officer (SHPO) and Consulting Tribes before any further work commences in the affected area. If the find is determined to be significant and avoidance of the find is not feasible, a Phase III Data Recovery Plan (Plan) shall be prepared by the Project Archeologist, in consultation with Consulting Tribe(s). The Plan shall be submitted to the City for review and approval prior to implementation of the Plan.</p> <p>Work outside of the buffer area shall be allowed to continue and such work shall be monitored per the CRMP.</p>				
4.8.8	<p><b>Human Remains.</b> If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the “most likely descendant.” The “most likely descendant” shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). No photographs are to be taken except by the Coroner, with written approval by the consulting Tribe[s].</p>	Throughout site disturbing activities.	<p>Applicant or successor(s) in interest; construction contractor(s);</p> <p>City of Moreno Valley; Project Archaeologist; Native American Monitor.</p>	City of Moreno Valley; Project Archaeologist; Native American Monitor.	Throughout site disturbing activities.
4.8.9	<p><b>Non-Disclosure of Reburial Locations.</b> It is understood by all parties that, unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 6254 (r)., parties, and Lead Agencies, shall be asked to withhold public disclosure information related to such</p>	Throughout site disturbing activities.	<p>Applicant or successor(s) in interest; construction contractor(s);</p> <p>City of Moreno Valley; Project Archaeologist; Native American Monitor.</p>	City of Moreno Valley; Project Archaeologist; Native American Monitor.	Throughout site disturbing activities.



**Table 4.2-1: Mitigation Monitoring Program**

**General Note:** To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Section / MM No.	Mitigation Measure	Mitigation Timing/Remarks	Implementation Entity	Monitoring/ Reporting Entity	Date of Completion/ Initials
	reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).				
<b>4.8.10</b>	Archeology Report - Phase III and IV. Prior to final inspection, the Project Applicant/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).	Prior to final site inspection and City approval grading work.	Applicant; Project Archaeologist.	City of Moreno Valley; Project Archaeologist.	Prior to final site inspection and City approval grading work.

# APPENDIX A

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Technical Consultation, Data Analysis and  
Litigation Support for the Environment

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February 25, 2025

Gary Ho  
Blum, Collins & Ho LLP  
707 Wilshire Blvd, Ste. 4880  
Los Angeles, CA 90017

**Subject: Comments on the Moreno Valley Business Park Building 5 Project (SCH No. 2023080366)**

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Dear Mr. Ho,

We have reviewed the January 2025 Draft Environmental Impact Report ("DEIR") for the Moreno Valley Business Park Building 5 ("Project") located in the City of Moreno Valley. The Project proposes constructing 220,390-square-feet ("SF") of industrial space and 134 parking spaces on the 9.98-acre site.

Upon review of the DEIR, we conclude that the Project's potential air quality, health risk, and greenhouse gas ("GHG") impacts were improperly analyzed. Emissions and health risk impacts associated with the construction and operation of the proposed Project may be underestimated. A revised Environmental Impact Report ("EIR") should be prepared to reassess and mitigate the potential air quality, health risk, and GHG impacts that the Project may have.

## Air Quality

### Unsubstantiated Input Parameters Used to Estimate Project Emissions

The DEIR relies on California Emissions Estimator Model ("CalEEMod") version 2020.4.0 to assess the Project's air quality impacts, a software used by proposed land use development projects to calculate criteria air pollutant emissions.<sup>1</sup> CalEEMod provides default values based on site-specific information, which can be adjusted with project-specific data, provided these changes are supported by substantial evidence. After entering relevant data, the model calculates construction and operational emissions and

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<sup>1</sup> "CalEEMod User Guide." CAPCOA, April 2022, available at: [https://www.caleemod.com/documents/user-guide/01\\_User%20Guide.pdf](https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf).

generates output files that detail the parameters used and any changes to default values, with justifications for each adjustment.<sup>2</sup>

Our review of the Project's CalEEMod output files, included in the Air Quality Impact Analysis ("AQIA") as Appendix D to the DEIR, revealed several inconsistencies between the model inputs and the DEIR's disclosures. These discrepancies undermine the reliability of the air quality analysis. The impacts of these unsubstantiated changes are quantified in the section of this letter titled "Updated Analysis Indicates a Potentially Significant Air Quality Impact." We recommend a revised EIR be prepared to include an updated air quality analysis that sufficiently evaluates the impact that construction of the Project may have on local and regional air quality.

### *Unsubstantiated Changes to Architectural Coating Values*

The "Moreno Valley Business Park - Phase II (Construction - Unmitigated)" CalEEMod model includes changes to the default architectural coating emission factors (see screenshot below) (Appendix D, pp. 125).

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	100.00	50.00

The nonresidential exterior architectural coating emission value is reduced from the default value of 100- to 50-grams per liter ("g/L"). The CalEEMod User's Guide requires any changes to model defaults be justified; according to the section of the model titled "User Entered Comments & Non-Default Data," the justification provided for this decrease is:

"Rule 1113" (Appendix D, pp. 126).

The model's reductions to the architectural coating emission factors lack sufficient justification. The DEIR states that the Project must use coatings compliant with South Coast Air Quality Management District ("SCAQMD") Rule 1113. Rule 1113's Table of Standards, however, lists specific volatile organic compounds ("VOC") limits ranging from 50 g/L to 730 g/L across 57 coating categories.<sup>3</sup> As the DEIR does not specify a particular coating type with a defined VOC limit, the accuracy of the revised emission factors is insufficient.

CalEEMod uses the architectural coating emission factors to calculate the Project's VOC emissions.<sup>4</sup> By including potentially unjustified reductions to the default architectural coating emission factors, the model may underestimate the Project's construction-related VOC emissions.

The DEIR does not directly incorporate these standards through a formal mitigation measure. The Association of Environmental Professionals ("AEP")'s *CEQA Portal Topic Paper* on mitigation measures

<sup>2</sup> "CalEEMod User's Guide." CAPCOA, April 2022, available at: [https://www.caleemod.com/documents/user-guide/01\\_User%20Guide.pdf](https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf), p. 1.

<sup>3</sup> "Small Entity Compliance Guide." U.S. Environmental Protection Agency, July 1999, available at: <https://www.epa.gov/sites/default/files/2015-06/documents/compliance-vocsarchcoatings.pdf>.

<sup>4</sup> "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 35, 40.

recommends including project design features that address environmental impacts in the Mitigation Monitoring and Reporting Program (“MMRP”).<sup>5</sup> Without formal inclusion in the MMRP, the use of low VOC coatings in compliance with Rule 1113 could be omitted from the Project's design. The DEIR does not formally commit to implementing, monitoring, or enforcing the use of these coatings, leaving uncertainty about whether the standards will be followed.

Using potentially inadequately supported reductions to the default architectural coating emission factors, CalEEMod may underestimate the Project’s construction-related and operational VOC emissions. The model should therefore be revised to determine whether the Project’s criteria air pollutant emissions are significant.

### *Unsubstantiated Changes to Individual Construction Phase Lengths*

Review of the CalEEMod output files demonstrates that the “Moreno Valley Business Park - Phase II (Construction - Unmitigated)” model includes a change to the default construction schedule (see screenshot below) (Appendix D, pp. 126):

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	100.00	50.00
tblConstructionPhase	NumDays	20.00	40.00

The model also includes the following construction schedule (see screenshot below) (Appendix D, pp. 131, 132).

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days
1	Site Preparation	Site Preparation	8/1/2022	8/12/2022	5	10
2	Grading	Grading	8/13/2022	9/9/2022	5	20
3	Building Construction	Building Construction	9/10/2022	7/28/2023	5	230
4	Architectural Coating	Architectural Coating	6/5/2023	7/28/2023	5	40
5	Paving	Paving	7/3/2023	7/28/2023	5	20

The architectural coating phase was doubled, from the default value of 20 to 40 days. The justification provided for these changes is:

“Construction anticipated to begin August 2022 and end in July 2023” (Appendix D, pp. 125)

The DEIR states that construction was expected to run from August 2022 to July 2023 and claims that the schedule represents a worst-case scenario (Appendix D, pp. 50). The DEIR provides the following construction schedule (see excerpt below) (Appendix D, p. 40, Table 3-3):

<sup>5</sup> “CEQA Portal Topic Paper Mitigation Measures.” AEP, February 2020, *available at*: <https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 6.

**TABLE 3-3: CONSTRUCTION DURATION**

Construction Activity	Start Date	End Date	Days
Site Preparation	08/01/2022	08/12/2022	10
Grading	08/13/2022	09/09/2022	20
Building Construction	09/10/2022	07/28/2023	230
Paving	07/03/2023	07/28/2023	20
Architectural Coating	06/05/2023	07/28/2023	40

The change to the architectural coating phase lengths, however, are not sufficiently justified. Although the DEIR justifies the total construction duration of 12 months, the provided table does not provide a source for the individual construction phase lengths.

Without a verifiable source, construction emissions may be unevenly distributed, with some phases extended over longer periods. According to the CalEEMod User's Guide, each construction phase is associated with different emissions activities (see excerpt below).<sup>6</sup>

**Table 3. CalEEMod Default Construction Phases \***

Phase Type	Description
<b>NON-LINEAR LAND USE TYPES (VERTICAL CONSTRUCTION)</b>	
Demolition	Involves removing buildings or structures.
Site Preparation	Involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.
Grading	Involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.
Building Construction	Involves the construction of the foundation, structures, and buildings.
Paving	Involves the laying of concrete or asphalt such as in parking lots, roads, driveways, or sidewalks.
Architectural Coating	Involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.

By disproportionately altering and extending the individual construction grading phase length without adequate support, the model assumes there are a greater number of days to complete the construction activities required by the prolonged phase. There will be fewer construction activities required per day and, consequently, less pollutants emitted per day. Until we can verify the revised construction schedule, the model may underestimate the peak daily emissions associated with the grading phase of construction, thereby failing to provide a reliable basis for assessing Project significance.

### *Potentially Underestimated Construction Hauling Trips*

The AQIA states that the Project's analysis assumes that earthwork activities will be balanced on-site, with no need for soil import or export (p. 39). The "Moreno Valley Business Park - Phase II (Construction - Unmitigated)" model therefore includes zero hauling trips for the construction demolition phase (see screenshot below) (Appendix D, pp. 133).

<sup>6</sup> "CalEEMod User Guide Version 2022.1." CAPCOA, April 2022, available at: [https://www.caleemod.com/documents/user-guide/01\\_User%20Guide.pdf](https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf), p. 34, Table. 3.



Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	3.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	5.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	183.00	63.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	37.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

This omission, however, lacks sufficient justification. CalEEMod's user guide explains that model inputs should be based on expert estimates, rather than arbitrary assumptions, to ensure the accuracy and reliability of the model's results.<sup>7</sup> By reducing the model's hauling trip numbers to zero, the model may underestimate the hauling trips required during all of the construction phases.

CalEEMod uses the number of hauling trips to estimate construction-related emissions associated with on-road vehicles.<sup>8</sup> By excluding any hauling trips for the entirety of the construction duration, the model may inaccurately reflect the Project's construction-related emissions.

### *Unsubstantiated Changes to Fleet Mix Values*

The "Moreno Valley Business Park - Phase II (Manufacturing Operations)", "Moreno Valley Business Park - Phase II (Warehousing Operations)", and "Moreno Valley Business Park - Phase II (High-Cube Cold Storage Operations)" models include changes to the default operational vehicle fleet mix percentages (see screenshot below) (Appendix D, pp. 162, 185, 186, 206, 207).

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	PhaseEndDate	8/26/2022	7/31/2022
tblFleetMix	HHO	0.02	0.00
tblFleetMix	HHO	0.02	0.63
tblFleetMix	LDA	0.53	0.58
tblFleetMix	LDA	0.53	0.00
tblFleetMix	LDT1	0.06	0.06
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT2	0.17	0.19
tblFleetMix	LDT2	0.17	0.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD1	0.03	0.10
tblFleetMix	LHD2	7.3100e-003	0.00
tblFleetMix	LHD2	7.3100e-003	0.03
tblFleetMix	MCY	0.02	0.03
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.14	0.15
tblFleetMix	MDV	0.14	0.00
tblFleetMix	MH	5.4680e-003	0.00
tblFleetMix	MH	5.4680e-003	0.00
tblFleetMix	MHO	0.01	0.00
tblFleetMix	MHO	0.01	0.25
tblFleetMix	OBUS	6.1600e-004	0.00
tblFleetMix	OBUS	6.1600e-004	0.00
tblFleetMix	SBUS	1.1000e-003	0.00
tblFleetMix	SBUS	1.1000e-003	0.00
tblFleetMix	UBUS	3.1500e-004	0.00
tblFleetMix	UBUS	3.1500e-004	0.00

<sup>7</sup> CalEEMod User Guide." CalEEMod 2022.1, April 2022, available at: [https://www.caleemod.com/documents/user-guide/CalEEMod\\_User\\_Guide\\_v2022.1.pdf](https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf).

<sup>8</sup> *Ibid.*, p. 36.

The justification provided for these changes is:

“Passenger Car Mix estimated based on the CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, & MCY). Truck Mix based on information in the Traffic analysis”(Appendix D, pp. 161, 185, 206).

According to the AQIA, the truck fleet mix is calculated by distributing trip rates for each truck type based on data from the Project’s Vehicle Miles Traveled (“VMT”) Analysis (p. 44). The VMT Analysis, which the Applicant claims supports these values, does not mention fleet mix. The Transportation Analysis, provided as Appendix C to the DEIR, addresses the fleet mix stating that:

“The truck percentages were further broken down by axle type per the following SCAQMD recommended truck mix: 2-Axle = 16.7%; 3-Axle = 20.7%; 4+-Axle = 62.6%” (p. 3).

Although the Transportation Analysis states that the fleet mix was based on SCAQMD recommendations, it does not indicate that the Project will adhere to these assumptions—only that they were used for the estimation. The changes made to the fleet mix percentages are consequently not sufficiently justified. Without Project-specific data, we recommend that the default assumptions be kept as default to ensure emissions estimates reflect the Project description.

Operational vehicle fleet mix percentages are used by CalEEMod to calculate the Project’s operational emissions associated with on-road vehicles.<sup>9</sup> By including these changes to the default operational vehicle fleet mix, the model may underestimate the Project’s mobile-source operational emissions. Until these percentages are verified, we suggest the models not be relied upon to determine Project significance.

#### *Unsubstantiated Saturday and Sunday Operational Vehicle Trips*

The “Moreno Valley Business Park - Phase II (Manufacturing Operations)”, “Moreno Valley Business Park - Phase II (Warehousing Operations)”, and “Moreno Valley Business Park - Phase II (High-Cube Cold Storage Operations)” models’ CalEEMod output files include changes to the default Saturday and Sunday vehicle trip values (see screenshot below) (Appendix D, pp. 163, 186, 187, 207, 208).

Table Name	Column Name	Default Value	New Value
tblVehicleTrips	ST_TR	6.42	1.34
tblVehicleTrips	ST_TR	0.00	0.15
tblVehicleTrips	SU_TR	5.09	0.89
tblVehicleTrips	SU_TR	0.00	0.10
tblVehicleTrips	WD_TR	3.93	4.30
tblVehicleTrips	WD_TR	0.00	0.48

As stated in the section titled “User Entered Comments & Non-Default Data,” the justification provided for these changes is:

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<sup>9</sup> *Ibid.*, p. 41.

“Trip characteristics based on information provided in the Traffic analysis” (Appendix D, pp. 161, 185, 206).

The VMT Analysis includes the following the proposed Project is expected to generate 498-daily operational vehicle trips (see excerpt below) (Appendix C, pp. 14, Table 2)

TABLE 2: PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity Units <sup>1</sup>	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
<b>Actual Vehicles:</b>								
Manufacturing	33.060 TSF							
Passenger Cars:		16	5	21	7	16	23	142
2-axle Trucks:		0	0	0	0	0	0	2
3-axle Trucks:		0	0	0	0	0	0	4
4+axle Trucks:		0	0	0	0	0	0	10
Total Truck Trips (Actual Vehicles):		0	0	0	0	0	0	16
<b>Subtotal Trips (Actual Vehicles)<sup>2</sup></b>		<b>16</b>	<b>5</b>	<b>21</b>	<b>7</b>	<b>16</b>	<b>23</b>	<b>158</b>
Warehousing	154.270 TSF							
Passenger Cars:		18	5	23	6	17	23	172
2-axle Trucks:		0	0	0	0	0	0	16
3-axle Trucks:		0	0	0	0	0	0	20
4+axle Trucks:		1	1	2	2	1	3	58
Total Truck Trips (Actual Vehicles):		1	1	2	2	1	3	94
<b>Subtotal Trips (Actual Vehicles)<sup>2</sup></b>		<b>19</b>	<b>6</b>	<b>25</b>	<b>8</b>	<b>18</b>	<b>26</b>	<b>266</b>
High-Cube Cold Storage	33.060 TSF							
Passenger Cars:		2	1	3	1	2	3	56
2-axle Trucks:		0	0	0	0	0	0	10
3-axle Trucks:		0	0	0	0	0	0	4
4+axle Trucks:		0	0	0	0	0	0	4
Total Truck Trips (Actual Vehicles):		0	0	0	0	0	0	18
<b>Subtotal Trips (Actual Vehicles)<sup>2</sup></b>		<b>2</b>	<b>1</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>74</b>
Passenger Cars		36	11	47	14	35	49	370
Trucks		1	1	2	2	1	3	128
<b>Project Total Trips (Actual Vehicles)<sup>2</sup></b>		<b>37</b>	<b>12</b>	<b>49</b>	<b>16</b>	<b>36</b>	<b>52</b>	<b>498</b>

<sup>1</sup> TSF = thousand square feet

<sup>2</sup> Total Trips = Passenger Cars + Truck Trips.

The Project’s model should therefore reflect the operational daily vehicle trip rate. Review of the CalEEMod output files, however, show that the model includes a total of 78.84 Saturday and 44.56 Sunday vehicle trips (Appendix D, pp. 170, 194, 215).<sup>10,11</sup>

The Saturday and Sunday trips are underestimated by approximately 419 trips and 453 trips, respectively, when compared to the information provided in the DEIR.<sup>12,13</sup> CalEEMod uses the operational vehicle trip rates to calculate emissions associated with operational on-road vehicles.<sup>14</sup> Since the model underestimates the Project’s mobile-source operational emissions by including underestimated Saturday and Sunday vehicle trips, we recommend it not be relied upon to assess Project significance.

## Updated Analysis Indicates a Potentially Significant Air Quality Impact

We created an updated CalEEMod model to provide an estimate of the Project’s potential construction related air quality emissions based upon the Project-specific information stated in the DEIR. We used

<sup>10</sup> Calculated: 49.26 + 23.14 + 6.44 = 78.84 total daily Saturday vehicle trips.

<sup>11</sup> Calculated: 32.73 + 9.26 + 2.57 = 44.56 total daily Sunday vehicle trips.

<sup>12</sup> Calculated: 458 proposed vehicle trips – 78.84 modeled vehicle trips = 419.16 underestimated vehicle trips.

<sup>13</sup> Calculated: 458 proposed vehicle trips – 44.56 modeled vehicle trips = 453.44 underestimated vehicle trips.

<sup>14</sup> “CalEEMod User’s Guide.” CAPCOA, April 2022, available at: <https://www.caleemod.com/user-guide>, Appendix C, p. C-20.

CalEEMod 2022.1, the most recently updated version of CalEEMod, to reflect the most recent methodologies, emission factors, and possible regulatory changes.<sup>15</sup> We excluded the unsubstantiated changes to the architectural coating emission factors, VMT values, and operational fleet mix values. We also proportionately altered the individual construction phase lengths to match the proposed construction duration of 12 months and altered the Saturday and Sunday vehicle trips to reflect the values supported by the DEIR. All other inputs remain consistent with the DEIR's model.<sup>16</sup>

Our updated analysis estimates that the Project's construction-related and operational VOC emissions would exceed the applicable SCAQMD threshold of 75 pounds per day ("lbs/day"), as referenced by the DEIR (p. 4.3-44, Table 4.3-5) (see table below).<sup>17</sup>

SWAPE Criteria Air Pollutant Emissions	
Construction	VOC (lbs/day)
DEIR	51.60
SWAPE	124.1
% Increase	140.5%
<b>SCAQMD Threshold</b>	<b>75</b>
Exceeds?	<b>Yes</b>

Our assessment shows that the Project's construction-related VOC emissions increase by approximately 141%, exceeding SCAQMD's significance threshold. Our updated model indicates a potentially significant air quality impact that the DEIR failed to identify or address. We suggest a revised EIR be prepared to more effectively evaluate and mitigate the Project's potential air quality impacts on the environment.

### Disproportionate Health Risk Impacts of Warehouses on Surrounding Communities

The proposed Project may contribute to the existing disproportionate health burden imposed by warehouse developments on nearby community members living, working, and going to school within the immediate area of the Project site. According to the SCAQMD, communities of color living within a half mile of warehouses face higher health risks, including increased rates of asthma and heart attacks, along with a greater environmental burden.<sup>18</sup>

<sup>15</sup> "Emissions Assessment Models and Calculator." SJAVAPCD, *available at*: <https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/emissions-assessment-models-and-calculators/>.

<sup>16</sup> See Attachment A for proportionately altered construction schedule and Attachment B for CalEEMod output files.

<sup>17</sup> "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at*: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>.

<sup>18</sup> "South Coast AQMD Governing Board Adopts Warehouse Indirect Source Rule." SCAQMD, May 2021, *available at*: <http://www.aqmd.gov/docs/default-source/news-archive/2021/board-adopts-waisr-may7-2021.pdf?sfvrsn=9>.

SCAQMD data indicates that more than 2.4 million people live within a half mile radius of at least one warehouse, with disproportionately high rates of asthma and heart disease.<sup>19</sup> These communities, which are predominantly Black and Latino and have lower median incomes, face heightened exposure to air pollution. Another study indicates that neighborhoods with lower household incomes and higher percentages of minority populations are likely to have a greater chance of containing warehousing facilities.<sup>20</sup> Furthermore, a report authored by the Inland Empire-based People's Collective for Environmental Justice and University of Redlands explains that the warehouse and logistics industry is expanding rapidly, with many new projects being built in low-income communities of color. These projects attract high volumes of polluting truck traffic, which emits harmful nitrogen oxide and particulate matter, contributing to severe health issues like asthma, COPD, cancer, and premature death.<sup>21</sup>

The ongoing development of industrial warehouses in these communities could raise environmental justice concerns. Despite well-documented public health impacts, warehouse development in the Inland Empire continues to grow at a rate of 10 to 25 million SF annually.<sup>22</sup>

The Data Visualization Tool for Mates V, a monitoring and evaluation study conducted by SCAQMD, shows that the County already exhibits a heightened residential carcinogenic risk from exposure to air toxics.<sup>23</sup> Specifically, the location of the Project site is in the 73<sup>rd</sup> percentile of the highest cancer risks in the South Coast Air Basin, with a cancer risk of 390 in one million (see screenshot below).<sup>24</sup>

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<sup>19</sup> "Southern California warehouse boom a huge source of pollution. Regulators are fighting back." Los Angeles Times, May 2021, *available at*: <https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution>.

<sup>20</sup> "Location of warehouses and environmental justice: Evidence from four metros in California." Metro Freight Center of Excellence, January 2018, *available at*: [https://www.metrotrans.org/assets/research/MF%201.1g\\_Location%20of%20warehouses%20and%20environmental%20justice\\_Final%20Report\\_021618.pdf](https://www.metrotrans.org/assets/research/MF%201.1g_Location%20of%20warehouses%20and%20environmental%20justice_Final%20Report_021618.pdf), p. 21.

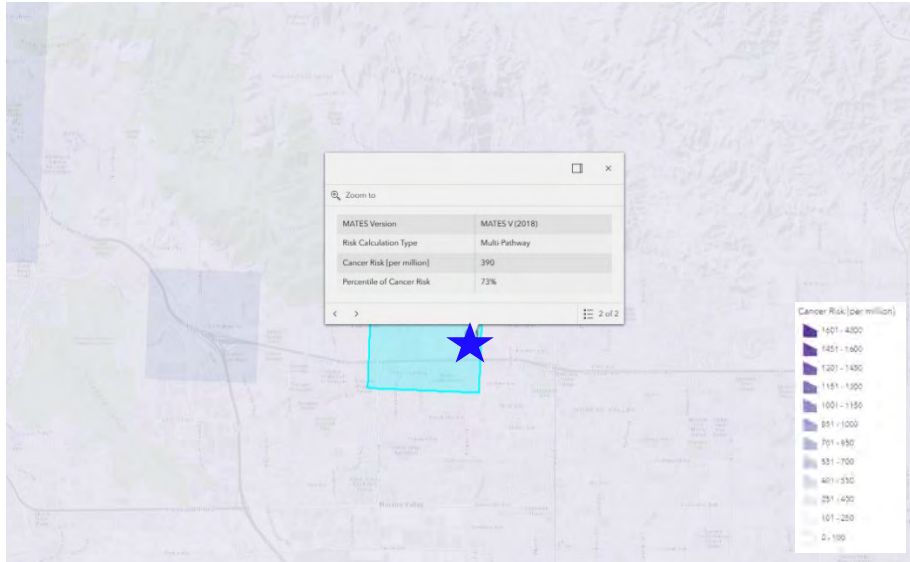
<sup>21</sup> "Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts on environmental justice communities across Southern California." People's Collective for Environmental Justice, April 2021, *available at*: [https://earthjustice.org/sites/default/files/files/warehouse\\_research\\_report\\_4.15.2021.pdf](https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf), p. 4.

<sup>22</sup> "2020 North America Industrial Big Box Review & Outlook." CBRE, 2020, *available at*: <https://www.cbre.com/-/media/project/cbre/shared-site/insights/local-responses/industrial-big-box-report-inland-empire/local-response-2020-ibb-inland-empire-overview.pdf>, p. 2.

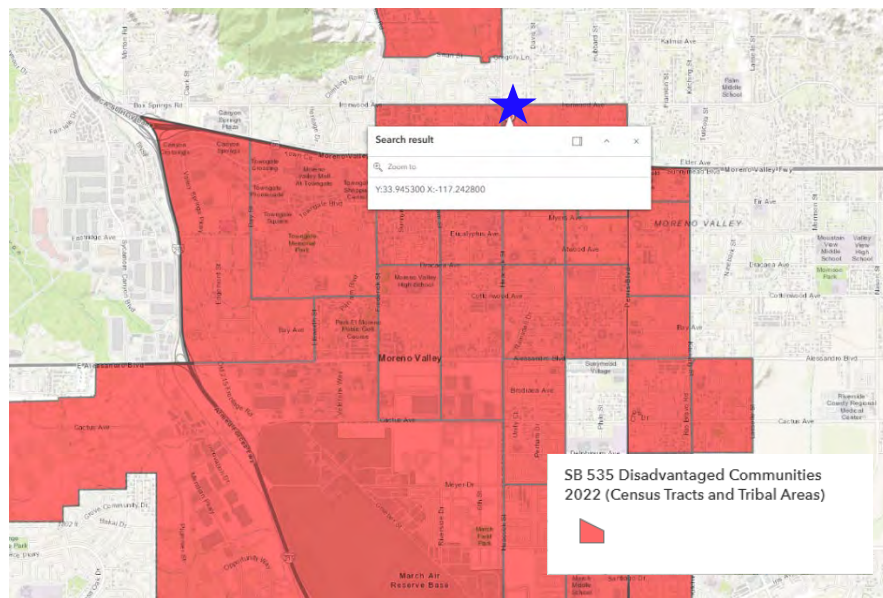
<sup>23</sup> "Residential Air Toxics Cancer Risk Calculated from Model Data in Grid Cells." MATES V, 2018, *available at*: <https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CGridded-Cancer-Risk>; see also: "MATES V Multiple Air Toxics Exposure Study." SCAQMD, *available at*: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

<sup>24</sup> "Gridded Cancer Risk." SCAQMD, *available at*: [https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?data\\_id=dataSource\\_112-7c8f2a4db79b4a918d46b4e8985a112b%3A20315&views=Click-tabs-for-other-data%2CGridded-Cancer-Risk](https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?data_id=dataSource_112-7c8f2a4db79b4a918d46b4e8985a112b%3A20315&views=Click-tabs-for-other-data%2CGridded-Cancer-Risk).





Additionally, the Project site is identified as a designated disadvantaged community according to CalEnviroScreen's Senate Bill ("SB") 535 Disadvantaged Communities Map (see screenshot below).<sup>25</sup>



SB 535 provides funding for development projects that provide a benefit to disadvantaged communities. The California Environmental Protection Agency is responsible for identifying those communities based on "geographic, socioeconomic, public health, and environmental hazard criteria."<sup>26</sup> As the Project site

<sup>25</sup> "SB 535 Disadvantaged Communities (2022 Update)." California Environmental Protection Agency, *available at*: <https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/>

<sup>26</sup> "Final Designation of Disadvantaged Communities." California Environmental Protection Agency, *available at*: [https://calepa.ca.gov/wp-content/uploads/sites/6/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng.a.hp\\_-1.pdf?emrc=e05e10](https://calepa.ca.gov/wp-content/uploads/sites/6/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng.a.hp_-1.pdf?emrc=e05e10).



is within a disadvantaged community, and the Project's census tract exhibits a high cancer risk, the proposed Project may contribute to the excessive health impacts warehouses can impose on nearby residents.

The proposed Project may exacerbate disproportionate health risks for community members within the immediate area, a concern underscored by the mandates of SB 1000. SB 1000, enacted to address environmental justice considerations, requires local governments to integrate environmental justice elements into their planning processes, particularly focusing on reducing health risks for disadvantaged communities.<sup>27</sup>

The DEIR states the proposed Project site is 103 feet away, or approximately 31 meters, from residential receptors (p. 4.3-47). Due to the Project's vicinity to sensitive receptors, the DEIR should comply with the objectives of SB 1000, which aim to address environmental justice challenges by incorporating policies to reduce the unique health risks faced by disadvantaged communities.

In accordance with the California Department of Justice ("CA DOJ") guidelines, the effects of GHG emissions and air pollutants from warehouses should be evaluated cumulatively. The CA DOJ outlines that when analyzing cumulative impacts, it's important to consider the project's incremental effect alongside past, present, and foreseeable future projects, even if the project's individual impacts don't exceed the significance thresholds.<sup>28</sup>

To more sufficiently assess the Project's impact on disadvantaged communities, we recommend both existing and anticipated warehouse developments be considered during the environmental review process.

The Warehouse Cumulative Impact Tool for Community dashboard ("Warehouse CITY"), developed by the Redford Conservancy at Pitzer College and Radical Research LLC, is a tool that visualizes and quantifies existing, potential, and approved warehouse locations across Southern California. Review of Warehouse CITY shows there are 77 existing warehouses currently in the Moreno Valley, 4 that have been approved, and 6 that are currently under CEQA review (see screenshot below).<sup>29</sup>

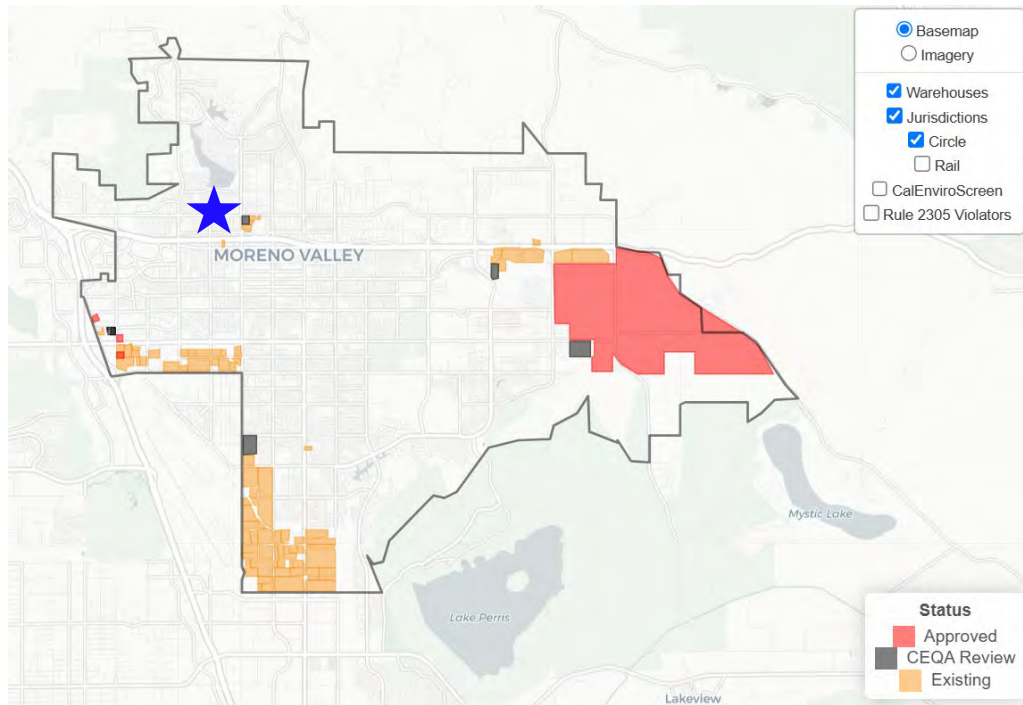
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<sup>27</sup> "Environmental Justice in Local Land Use Planning." CA DOJ, *available at*:

<https://oag.ca.gov/environment/sb1000>.

<sup>28</sup> "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." CA DOJ, *available at*: <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>, p. 6.

<sup>29</sup> "Warehouse and Air Quality Mapping." Pitzer College & Radical Research LLC, *available at*: <https://radicalresearch.shinyapps.io/WarehouseCITY/>.



We believe the presence of numerous existing warehouses in Moreno Valley underscores the need to reassess the Project's cumulative health risks, with regard to CA DOJ guidelines and SB 1000 environmental justice requirements.

### Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR concludes that the proposed Project would result in a less than significant health risk impact based on a quantified construction and operational health risk analysis ("HRA"), as outlined in the Mobile Source Health Risk Assessment ("HRA Report"), provided as Appendix D to the DEIR. Specifically, the HRA Report estimates that the cumulative maximum cancer risk posed to nearby, existing residential sensitive receptors associated with construction and operation would be 6.04 and 0.79 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (p. 4.3-56).

However, the DEIR's evaluation of the Project's potential health risk impacts, and its conclusion that these impacts are less than significant, lacks sufficient support.

In the section of this letter titled "Unsubstantiated Input Parameters Used to Estimate Project Emissions," we demonstrate that the DEIR's CalEEMod models, upon which the HRA relies, include unsupported input values. The HRA may therefore underestimate the diesel particulate matter ("DPM") used to calculate the health risks associated with Project construction. Until the models are properly verified, we recommend that the DEIR's HRA and resulting cancer risk not be relied upon to determine Project significance.

The DEIR's operational HRA may also underestimate the Fraction of Time At Home ("FAH") values for the third trimester, infant, and child receptors. Specifically, the HRA Report utilizes an FAH value of 0.85 for the third trimester and infant receptors, and an FAH value of 0.72 for the child receptors (pp. 367,

368, 369; Table 1 – 3). However, SCAQMD guidance states that for screening purposes, “the FAH is set to 1 for individuals from the third trimester to age 16, assuming children stay near home for school or daycare with no time discount.”<sup>30</sup>

Per SCAQMD guidance, the HRA Report should have used an FAH of 1 for the third trimester, infant, and child receptors. By relying on FAH values that lack sufficient verification, we find that the DEIR may underestimate the cancer risk posed to nearby, existing sensitive receptors due to Project construction and operation.

## Greenhouse Gas

### Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR estimates that Project construction and operation would produce net annual GHG emissions of 2,813.72-metric tons of carbon dioxide equivalents per year (“MT CO<sub>2</sub>e/year”) (see excerpt below) (p. 4.4-36, Table 4.4-5).

**Table 4.4-5  
Annual Project GHG Emissions**

Emission Source	Emissions (metric tons per year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> E
Annual construction-related emissions amortized over 30 years	27.77	4.99E-03	7.85E-04	28.13
Area Sources	0.02	4.00E-05	0.00	0.02
Energy Consumption	522.61	0.03	6.68E-03	525.44
Mobile Sources	1,826.27	0.04	0.22	1,892.88
TRUs				19.24
On-Site Equipment	50.75	0.02	0.00	51.16
Solid Waste Management	44.07	2.60	0.00	109.17
Water Usage	133.86	1.67	0.04	187.67
<b>Total CO<sub>2</sub>E (All Sources)</b>	<b>2,813.72</b>			

Source: Moreno Valley Business Park - Phase II, Greenhouse Gas Analysis (Urban Crossroads, Inc.) January 17, 2022.

Note: Totals obtained from CalEEMod<sup>TM</sup> and may not total 100% due to rounding.

The DEIR concludes that the Project’s GHG emissions would be below the SCAQMD threshold of 3,000 MT CO<sub>2</sub>e per year (p. 4.4-36). In our opinion, the DEIR’s analysis and the subsequent less than significant impact conclusion lack sufficient support for the following reasons:

- (1) The DEIR’s quantitative GHG analysis relies upon a flawed air model;
- (2) The DEIR’s quantitative GHG analysis relies upon an outdated threshold; and
- (3) The DEIR’s unsubstantiated air model indicates a potentially significant impact.

#### 1) Unsubstantiated Quantitative Analysis of Emissions

The DEIR estimates that the Project would generate net annual GHG emissions of 2,813.72 MT CO<sub>2</sub>e/year, however, the quantitative analysis presented in the DEIR lacks reliable support. As previously mentioned, our analysis showed that there are discrepancies between the several input values in the

<sup>30</sup> “Risk Assessment Procedures.” SCAQMD, August 2017, available at: [http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures\\_2017\\_080717.pdf](http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf), p. 7.

AQIA's CalEEMod models and the information disclosed in the DEIR.<sup>31</sup> In the section titled "Updated analysis Indicates a Potentially Significant Air Quality Impact", we examined how the emissions would exceed regulatory thresholds. The DEIR's analysis lacks sufficient support and may not be reliable for assessing the Project's potential GHG significance.

### 2) *Unsupported Reliance on an Outdated Quantitative GHG Threshold*

The DEIR applies SCAQMD's 3,000 MT CO<sub>2</sub>e/year threshold developed in 2008 and based on California's now-surpassed 2020 GHG reduction goals. This guidance was set when AB 32, the Global Warming Solutions Act of 2006, required California to reduce GHG emissions to 1990 levels by 2020.<sup>32</sup> Additionally, AEP guidance states that for projects beyond 2020, the threshold must be updated using a new gap analysis to assess future development and reduction potential for the next GHG reduction target.<sup>33</sup> As it is currently February 2025, thresholds for 2020 are no longer applicable to the Project and should be revised to reflect the current GHG reduction target.

We recommend that the Project apply the SCAQMD 2035 service population efficiency target of 3.0 metric tons of carbon dioxide equivalents per service population per year ("MT CO<sub>2</sub>e/SP/year"), calculated by applying a 40% reduction to the 2020 targets.<sup>34</sup>

### 3) *Failure to Identify a Potentially Significant GHG Impact*

To assess the Project's GHG emissions, we compared them to the SCAQMD 2035 efficiency target of 3.0 MT CO<sub>2</sub>e/SP/year. According to California Air Pollution Control Officers Association ("CAPCOA")'s *CEQA & Climate Change* report, a service population ("SP") is defined as "the sum of the number of residents and the number of jobs supported by the project."<sup>35</sup> According to the DEIR, the Project is expected to support 214 employees, and does not mention any future residents (p. 4.2-7). When dividing the Project's net annual GHG emissions, as estimated by the DEIR, by an SP of 214 people, the Project would emit approximately 13.15 MT CO<sub>2</sub>e/SP/year (see table below).<sup>36</sup>

DEIR Greenhouse Gas Emissions	
Annual Emissions (MT CO <sub>2</sub> e/year)	2,814
Service Population	214
Service Population Efficiency (MT CO <sub>2</sub> e/SP/year)	13.15

<sup>31</sup> See the section of this letter titled "Unsubstantiated Input Parameters Used to Estimate Project Emissions."

<sup>32</sup> "Health & Safety Code 38550." California State Legislature, January 2006, *available at*: [https://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=HSC&sectionNum=38550](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=38550).

<sup>33</sup> "Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California." AEP, October 2016, *available at*: <https://califaep.org/docs/AEP-2016-Final-White-Paper.pdf>, p. 39.

<sup>34</sup> "Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15." SCAQMD, September 2010, *available at*: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf), p. 2.

<sup>35</sup> "CEQA & Climate Change." CAPCOA, January 2008, *available at*: <https://www.ourair.org/wp-content/uploads/CAPCOA-CEQA-and-Climate-Change.pdf>, p. 71-72.

<sup>36</sup> *Calculated*: (2813.72 MT CO<sub>2</sub>e/year) / (214 service population) = (13.15 MT CO<sub>2</sub>e/SP/year).

## SCAQMD Threshold

3.0

Exceeds?

Yes

The Project's service population efficiency value exceeds the SCAQMD 2035 efficiency target of 3.0 MT CO<sub>2</sub>e/SP/year, indicating a potentially significant impact not previously identified by the DEIR. We suggest that the DEIR's less than significant GHG impact not be relied upon. We recommend a revised EIR should be prepared that includes an updated GHG analysis and additional mitigation measures to reduce the Project's GHG emissions to less-than-significant levels.

## Mitigation

### Feasible Mitigation Measures Available to Reduce Emissions

CEQA requires the DEIR to incorporate all feasible mitigation measures to reduce the Project's emissions and health risk impacts.<sup>37</sup> Given our analysis demonstrating the Project's potentially significant air quality, health risk, and GHG impacts, additional mitigation should be implemented to ensure compliance with regulatory standards and environmental justice objectives.

To reduce VOC emissions associated with Project construction, we recommend the DEIR consider incorporating the following mitigation measure from the CA DOJ:<sup>38</sup>

- Require the use of super compliant, low-VOC paints less than 10 g/L during the architectural coating construction phase.

Further mitigation used by other land use development projects to address VOC emissions is as follows:

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- Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain
- Use compliant low-VOC cleaning solvents to clean paint application equipment.
- Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions.
- Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable.

<sup>37</sup> "Guidance on Frequently Questioned Topics in Roadway Analysis for the California Environmental Quality Act (CEQA)." CEQA, February 2018, available at: [https://www.aqmd.gov/docs/default-source/ceqa/handbook/roadway-ceqa-guidance\\_v10.pdf](https://www.aqmd.gov/docs/default-source/ceqa/handbook/roadway-ceqa-guidance_v10.pdf), p. 2.

<sup>38</sup> "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>, p. 8 – 10.

<sup>39</sup> "Banning Commerce Center Project." Kimley-Horn and Associates, Inc., June 2024, available at: <https://ceganet.opr.ca.gov/2022090102/2>; Draft Environmental Impact Report, p. 1-7.

- Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.

Additionally, Los Angeles County recommends:<sup>40</sup>

- If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September.

While the Project is not located in Los Angeles County, the use of low-VOC paints would nonetheless decrease the Project's significant VOC emissions.

The U.S. EPA recommends conducting calculations for coverage area and thinning ratios prior to purchasing paints. By applying these calculations, the appropriate quantity of paint can be acquired, thereby helping to minimize waste and optimize resource use.<sup>41</sup>

To reduce construction VOC emissions, the California Department of Public Health recommends the use of:<sup>42</sup> “

- Natural materials such as solid wood products (e.g., hard wood flooring and wood paneling), natural stone (e.g., granite and marble), ceramic tile, and glass.
- Composite wood products that comply with the California Air Resources Board (“CARB”) Airborne Toxic Control Measure for formaldehyde.
- Interior paints, coatings, adhesives, and sealants that comply with South Coast AQMD Rule 1168 or CARB’s Suggested Control Measure for Architectural Coatings.
- Flooring materials that are certified as low emitting under the California Department of Public Health (CDPH) Standard Method v1.2 or equivalent.
- Steel cabinets instead of plywood; prefinished, nailed-down hardwood flooring instead of carpeting; and masonry flooring such as ceramic tile or marble instead of carpeting.
- Sealer on the surface of spray-on fireproofing to reduce adsorption of VOCs using a low-VOC sealer, if necessary.

Additionally, to reduce the DPM emissions associated with Project construction and operation, we recommend the DEIR consider several mitigation measures (see list below).

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<sup>40</sup> “Mitigation Monitoring and Reporting Program.” Los Angeles County Housing Element Update Program EIR. August 2021, *available at*: [https://planning.lacounty.gov/wp-content/uploads/2023/07/Housing\\_final-peir-mitigation-monitoring.pdf](https://planning.lacounty.gov/wp-content/uploads/2023/07/Housing_final-peir-mitigation-monitoring.pdf).

<sup>41</sup> “Industrial Surface Coating.” Emissions Inventory Improvement Program, September 1997, *available at*: <https://www.epa.gov/sites/default/files/2015-08/documents/iii08.pdf>, Volume III, Chapter 8, p. 8.3-1.

<sup>42</sup> “Reducing occupant exposure to volatile organic compounds (VOCs) from indoor sources: Guidelines for building occupants.” California Department of Public Health, July 1996, *available at*: [https://www.cdph.ca.gov/Programs/CCDC/PHP/DEODC/EHLB/IAQ/CDPH%20Document%20Library/reducing\\_occupant\\_exposure\\_vocs\\_guidelines\\_ADA.pdf](https://www.cdph.ca.gov/Programs/CCDC/PHP/DEODC/EHLB/IAQ/CDPH%20Document%20Library/reducing_occupant_exposure_vocs_guidelines_ADA.pdf).



CARB recommends:<sup>43</sup>

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
- Require all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine.
- Requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
- Require all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NOx) standard starting in the year 2022.
- Require all construction equipment and fleets to be in compliance with all current air quality regulations.
- Require tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
- Require all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units.
- Requiring all TRUs entering the project-site be plug-in capable.
- Requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).
- Require future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
- Require all heavy-duty trucks entering or on the project site to be zero-emission vehicles and be fully zero-emission. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP). Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.
- Restrict trucks and support equipment from idling longer than two minutes while on site.

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<sup>43</sup> "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers." CARB, August 2023, available at: <https://ww2.arb.ca.gov/sites/default/files/2023-08/CARB%20Comments%20-%20NOP%20for%20the%20Oak%20Valley%20North%20Project%20DEIR.pdf>; Attachment A, p. 5 – 8.

- Require the installation of vegetative walls or other effective barriers that separate loading docks and people living or working nearby.

In addition to recommending similar mitigation as the above-mentioned measures from CARB, the CA DOJ suggests:<sup>44</sup>

- Prohibiting off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Installing and maintaining, at the manufacturer’s recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer’s recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.

Lastly, SCAQMD staff recommends:<sup>45</sup>

- Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

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<sup>44</sup> “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.” State of California Department of Justice, September 2022, *available at*: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>, p. 8 – 10.

<sup>45</sup> “Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project).” SCAQMD, April 2024, *available at*: <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8>, p. 3 - 4.

- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

The CalEEMod User's Guide confirms that the methods for mitigating DPM emissions include the use of "alternative fuel, electric equipment, diesel particulate filters (DPF), oxidation catalysts, newer tier engines, and dust suppression."<sup>46</sup>

We recommend several mitigation measures to reduce potential GHG emissions associated with the Project (see list below).

The CA DOJ recommends:<sup>47</sup>

- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces.
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.

<sup>46</sup> "Calculation Details for CalEEMod." CAPCOA, May 2021, available at: <http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6>, Appendix A, p. 60.

<sup>47</sup> "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>, p. 8 – 10.

- Requiring tenants to enroll in the United States Environmental Protection Agency’s SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

SCAQMD staff recommends:<sup>48</sup>

- Maximizing the use of solar energy by installing solar energy arrays.
- Using light-colored paving and roofing materials.
- Utilizing only Energy Star heating, cooling, and lighting devices and appliances.

CEQA Guidelines 15126.4 (c)(3) include “[o]ffsite measures, including offsets that are not otherwise required, to mitigate a project’s emissions” as an option for GHG mitigation.<sup>49</sup> For example, in the Oakland Sports and Mixed-Use Project, officials recommended off-site reduction measures in nearby communities.<sup>50</sup> We recommend consideration of local carbon offset programs to reduce the Project’s GHG impacts as a measure of last result.

We have provided several mitigation measures that would reduce Project-related VOC, DPM, and GHG emissions developed from trusted sources. A revised EIR should be prepared that includes all feasible mitigation measures, as well as updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure compliance.

## Disclaimer

SWAPE has received limited documentation regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was

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<sup>48</sup> “Draft Environmental Impact Report (EIR) for the Proposed CADO Meniffee Industrial Warehouse Project (Proposed Project).” SCAQMD, April 2024, *available at*: <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8>, p. 3.

<sup>49</sup> “Cal. Code Regs. tit. 14 § 15126.4.” CEQA Guidelines, May 2024, *available at*: <https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-9-contents-of-environmental-impact-reports/section-151264-consideration-and-discussion-of-mitigation-measures-proposed-to-minimize-significant-effects>.

<sup>50</sup> “Cal. Pub. Resources Code § 21168.6.7.” 2023, *available at*: <https://casetext.com/statute/california-codes/california-public-resources-code/division-13-environmental-quality/chapter-6-limitations/section-2116867-oakland-sports-and-mixed-use-project-conditions-for-approval-certification-of-project-for-streamlining>.

reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Hagemann".

Matt Hagemann, P.G., C.Hg.

A handwritten signature in blue ink, appearing to read "Paul E. Rosenfeld".

Paul E. Rosenfeld, Ph.D.

**Attachment A: Construction Calculations**  
**Attachment B: CalEEMod Output Files**  
**Attachment C: Matt Hagemann CV**  
**Attachment D: Paul Rosenfeld CV**

Construction Schedule Calculations					
Phase	Default Phase Length	Construction Duration	%	Construction Duration	Revised Phase Length
Site Preparation	10	453	0.0221	392	9
Grading	20	453	0.0442	392	17
Construction	230	453	0.5077	392	199
Paving	20	453	0.0442	392	17
Architectural Coating	20	453	0.0442	392	17

	Total Default Construction Duration	Revised Construction Duration
Start Date	8/1/2022	8/1/2022
End Date	10/28/2023	8/28/2023
Total Days	453	392



# Moreno Valley Business Park Detailed Report

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5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

### 5.16.2. Process Boilers

## 5.17. User Defined

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

### 6.2. Initial Climate Risk Scores

### 6.3. Adjusted Climate Risk Scores

### 6.4. Climate Risk Reduction Measures

## 7. Health and Equity Details

### 7.1. CalEnviroScreen 4.0 Scores

### 7.2. Healthy Places Index Scores

### 7.3. Overall Health & Equity Scores

### 7.4. Health & Equity Measures

### 7.5. Evaluation Scorecard

### 7.6. Health & Equity Custom Measures

## 8. User Changes to Default Data



# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Moreno Valley Business Park
Construction Start Date	8/1/2022
Operational Year	2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	10.0
Location	33.9453, -117.2428
County	Riverside-South Coast
City	Moreno Valley
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5594
EDFZ	11
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Manufacturing	33.1	1000sqft	0.76	33,060	0.00	—	—	—

Refrigerated Warehouse-No Rail	33.1	1000sqft	0.08	33,060	0.00	—	—	—
Unrefrigerated Warehouse-No Rail	154	1000sqft	3.54	154,270	0.00	—	—	—
Other Asphalt Surfaces	173	1000sqft	3.98	173,370	0.00	—	—	—
Parking Lot	134	Space	0.94	0.00	41,076	—	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	124	124	43.5	38.4	0.05	1.99	19.9	21.9	1.83	10.2	12.0	—	7,324	7,324	0.26	0.42	17.0	7,473
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.82	3.19	24.2	29.8	0.04	1.31	2.71	4.02	1.21	0.66	1.87	—	7,122	7,122	0.27	0.42	0.44	7,255
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.96	6.78	7.93	9.73	0.01	0.43	1.52	1.95	0.39	0.57	0.96	—	2,331	2,331	0.09	0.13	2.23	2,373
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.27	1.24	1.45	1.78	< 0.005	0.08	0.28	0.36	0.07	0.10	0.18	—	386	386	0.01	0.02	0.37	393

## 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2022	5.11	4.29	43.5	38.4	0.05	1.99	19.9	21.9	1.83	10.2	12.0	—	7,324	7,324	0.26	0.42	17.0	7,473
2023	124	124	21.5	31.9	0.04	1.17	2.71	3.88	1.08	0.66	1.74	—	7,263	7,263	0.26	0.41	16.1	7,406
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2022	3.82	3.19	24.2	29.8	0.04	1.31	2.71	4.02	1.21	0.66	1.87	—	7,122	7,122	0.27	0.42	0.44	7,255
2023	3.49	2.96	21.8	28.3	0.04	1.17	2.71	3.88	1.08	0.66	1.74	—	7,066	7,066	0.26	0.41	0.42	7,195
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2022	1.17	0.98	7.93	8.99	0.01	0.43	1.52	1.95	0.39	0.57	0.96	—	1,930	1,930	0.07	0.10	1.72	1,963
2023	6.96	6.78	7.27	9.73	0.01	0.39	0.87	1.26	0.36	0.21	0.57	—	2,331	2,331	0.09	0.13	2.23	2,373
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2022	0.21	0.18	1.45	1.64	< 0.005	0.08	0.28	0.36	0.07	0.10	0.18	—	319	319	0.01	0.02	0.28	325
2023	1.27	1.24	1.33	1.78	< 0.005	0.07	0.16	0.23	0.07	0.04	0.10	—	386	386	0.01	0.02	0.37	393

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	11.1	10.5	3.95	40.1	0.06	0.18	4.29	4.47	0.17	1.09	1.26	215	10,456	10,670	22.3	0.50	911	12,286
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	7.85	7.55	3.99	19.3	0.06	0.15	4.29	4.44	0.14	1.09	1.23	215	10,063	10,278	22.3	0.50	890	11,876
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	9.92	9.46	4.14	31.7	0.06	0.17	4.26	4.43	0.16	1.08	1.24	215	10,158	10,373	22.3	0.51	899	11,980
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.81	1.73	0.75	5.79	0.01	0.03	0.78	0.81	0.03	0.20	0.23	35.5	1,682	1,717	3.69	0.08	149	1,983

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.55	2.33	2.40	21.8	0.05	0.04	4.29	4.33	0.04	1.09	1.13	—	5,255	5,255	0.21	0.23	21.3	5,350
Area	8.35	8.12	0.14	17.1	< 0.005	0.03	—	0.03	0.02	—	0.02	—	70.4	70.4	< 0.005	< 0.005	—	70.7
Energy	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	4,620	4,620	0.33	0.03	—	4,635
Water	—	—	—	—	—	—	—	—	—	—	—	97.7	511	608	10.0	0.24	—	932
Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	890	890
Total	11.1	10.5	3.95	40.1	0.06	0.18	4.29	4.47	0.17	1.09	1.26	215	10,456	10,670	22.3	0.50	911	12,286
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.39	2.17	2.58	18.1	0.05	0.04	4.29	4.33	0.04	1.09	1.13	—	4,933	4,933	0.21	0.24	0.55	5,010
Area	5.31	5.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	4,620	4,620	0.33	0.03	—	4,635
Water	—	—	—	—	—	—	—	—	—	—	—	97.7	511	608	10.0	0.24	—	932
Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	890	890

Total	7.85	7.55	3.99	19.3	0.06	0.15	4.29	4.44	0.14	1.09	1.23	215	10,063	10,278	22.3	0.50	890	11,876
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.37	2.15	2.63	18.8	0.05	0.04	4.26	4.30	0.04	1.08	1.12	—	4,980	4,980	0.22	0.24	9.18	5,066
Area	7.39	7.23	0.10	11.7	< 0.005	0.02	—	0.02	0.02	—	0.02	—	48.2	48.2	< 0.005	< 0.005	—	48.4
Energy	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	4,620	4,620	0.33	0.03	—	4,635
Water	—	—	—	—	—	—	—	—	—	—	—	97.7	511	608	10.0	0.24	—	932
Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	890	890
Total	9.92	9.46	4.14	31.7	0.06	0.17	4.26	4.43	0.16	1.08	1.24	215	10,158	10,373	22.3	0.51	899	11,980
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.43	0.39	0.48	3.44	0.01	0.01	0.78	0.79	0.01	0.20	0.20	—	824	824	0.04	0.04	1.52	839
Area	1.35	1.32	0.02	2.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.99	7.99	< 0.005	< 0.005	—	8.01
Energy	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	765	765	0.05	< 0.005	—	767
Water	—	—	—	—	—	—	—	—	—	—	—	16.2	84.6	101	1.66	0.04	—	154
Waste	—	—	—	—	—	—	—	—	—	—	—	19.4	0.00	19.4	1.94	0.00	—	67.8
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	147	147
Total	1.81	1.73	0.75	5.79	0.01	0.03	0.78	0.81	0.03	0.20	0.23	35.5	1,682	1,717	3.69	0.08	149	1,983

### 3. Construction Emissions Details

#### 3.1. Site Preparation (2022) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	4.99	4.20	43.4	36.7	0.05	1.99	—	1.99	1.83	—	1.83	—	5,291	5,291	0.21	0.04	—	5,309
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	1.07	0.91	< 0.005	0.05	—	0.05	0.05	—	0.05	—	130	130	0.01	< 0.005	—	131
Dust From Material Movement	—	—	—	—	—	—	0.48	0.48	—	0.25	0.25	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.20	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	21.6	21.6	< 0.005	< 0.005	—	21.7
Dust From Material Movement	—	—	—	—	—	—	0.09	0.09	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.10	0.11	1.72	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	262	262	0.01	0.01	1.20	266
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.01	6.01	< 0.005	< 0.005	0.01	6.10
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.00	1.00	< 0.005	< 0.005	< 0.005	1.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.3. Grading (2022) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.53	2.97	27.8	22.1	0.03	1.64	—	1.64	1.51	—	1.51	—	3,132	3,132	0.13	0.03	—	3,143



Dust From Material Movement	—	—	—	—	—	—	8.67	8.67	—	3.60	3.60	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.14	1.29	1.03	< 0.005	0.08	—	0.08	0.07	—	0.07	—	146	146	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.40	0.40	—	0.17	0.17	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.24	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.2	24.2	< 0.005	< 0.005	—	24.2
Dust From Material Movement	—	—	—	—	—	—	0.07	0.07	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.08	0.09	1.47	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	225	225	0.01	0.01	1.03	228

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.74	9.74	< 0.005	< 0.005	0.02	9.87
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.5. Building Construction (2022) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.69	2.25	20.0	16.7	0.03	1.28	—	1.28	1.18	—	1.18	—	2,806	2,806	0.11	0.02	—	2,816
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	2.69	2.25	20.0	16.7	0.03	1.28	—	1.28	1.18	—	1.18	—	2,806	2,806	0.11	0.02	—	2,816
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.61	0.52	4.57	3.82	0.01	0.29	—	0.29	0.27	—	0.27	—	643	643	0.03	0.01	—	645
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.83	0.70	< 0.005	0.05	—	0.05	0.05	—	0.05	—	106	106	< 0.005	< 0.005	—	107
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.07	0.92	1.02	16.2	0.00	0.00	2.16	2.16	0.00	0.51	0.51	—	2,478	2,478	0.10	0.08	11.4	2,516
Vendor	0.12	0.07	2.99	0.80	0.01	0.03	0.55	0.58	0.03	0.15	0.18	—	2,040	2,040	0.04	0.32	5.67	2,141
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.02	0.87	1.09	12.3	0.00	0.00	2.16	2.16	0.00	0.51	0.51	—	2,276	2,276	0.11	0.08	0.29	2,303
Vendor	0.12	0.07	3.12	0.83	0.01	0.03	0.55	0.58	0.03	0.15	0.18	—	2,040	2,040	0.04	0.32	0.15	2,136
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.23	0.20	0.27	2.96	0.00	0.00	0.49	0.49	0.00	0.12	0.12	—	528	528	0.02	0.02	1.12	535
Vendor	0.03	0.02	0.72	0.19	< 0.005	0.01	0.13	0.13	0.01	0.03	0.04	—	467	467	0.01	0.07	0.56	490
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.05	0.54	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	87.4	87.4	< 0.005	< 0.005	0.19	88.6
Vendor	< 0.005	< 0.005	0.13	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	77.3	77.3	< 0.005	0.01	0.09	81.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.7. Building Construction (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	2.47	2.07	18.3	16.2	0.03	1.14	—	1.14	1.05	—	1.05	—	2,806	2,806	0.11	0.02	—	2,815
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	2.47	2.07	18.3	16.2	0.03	1.14	—	1.14	1.05	—	1.05	—	2,806	2,806	0.11	0.02	—	2,815
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.77	0.65	5.72	5.07	0.01	0.36	—	0.36	0.33	—	0.33	—	879	879	0.04	0.01	—	882
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.04	0.92	< 0.005	0.07	—	0.07	0.06	—	0.06	—	145	145	0.01	< 0.005	—	146
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.97	0.88	0.87	15.0	0.00	0.00	2.16	2.16	0.00	0.51	0.51	—	2,430	2,430	0.10	0.08	10.4	2,467
Vendor	0.11	0.06	2.36	0.74	0.01	0.03	0.55	0.58	0.03	0.15	0.18	—	2,027	2,027	0.04	0.30	5.64	2,124
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.92	0.84	1.02	11.4	0.00	0.00	2.16	2.16	0.00	0.51	0.51	—	2,232	2,232	0.11	0.08	0.27	2,260
Vendor	0.10	0.06	2.48	0.76	0.01	0.03	0.55	0.58	0.03	0.15	0.18	—	2,028	2,028	0.04	0.30	0.15	2,119
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.26	0.32	3.73	0.00	0.00	0.67	0.67	0.00	0.16	0.16	—	708	708	0.03	0.03	1.40	718
Vendor	0.03	0.02	0.78	0.23	< 0.005	0.01	0.17	0.18	0.01	0.05	0.06	—	635	635	0.01	0.09	0.77	664
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.06	0.68	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	117	117	0.01	< 0.005	0.23	119
Vendor	0.01	< 0.005	0.14	0.04	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	105	105	< 0.005	0.02	0.13	110

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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### 3.9. Paving (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.04	0.88	8.06	10.0	0.01	0.41	—	0.41	0.38	—	0.38	—	1,512	1,512	0.06	0.01	—	1,517
Paving	0.76	0.76	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.47	< 0.005	0.02	—	0.02	0.02	—	0.02	—	70.4	70.4	< 0.005	< 0.005	—	70.6
Paving	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.08	1.36	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	220	220	0.01	0.01	0.94	224
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.55	9.55	< 0.005	< 0.005	0.02	9.68
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.58	1.58	< 0.005	< 0.005	< 0.005	1.60
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.11. Architectural Coating (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Off-Road Equipment	0.24	0.20	1.25	1.54	< 0.005	0.05	—	0.05	0.05	—	0.05	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	124	124	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.29	8.29	< 0.005	< 0.005	—	8.32
Architectural Coatings	5.76	5.76	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.37	1.37	< 0.005	< 0.005	—	1.38
Architectural Coatings	1.05	1.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.19	0.18	0.17	3.00	0.00	0.00	0.43	0.43	0.00	0.10	0.10	—	486	486	0.02	0.02	2.08	493
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	21.1	21.1	< 0.005	< 0.005	0.04	21.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.49	3.49	< 0.005	< 0.005	0.01	3.54
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	2.55	2.33	2.40	21.8	0.05	0.04	4.29	4.33	0.04	1.09	1.13	—	5,255	5,255	0.21	0.23	21.3	5,350

Refriger Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	2.55	2.33	2.40	21.8	0.05	0.04	4.29	4.33	0.04	1.09	1.13	—	5,255	5,255	0.21	0.23	21.3	5,350
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	2.39	2.17	2.58	18.1	0.05	0.04	4.29	4.33	0.04	1.09	1.13	—	4,933	4,933	0.21	0.24	0.55	5,010
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	2.39	2.17	2.58	18.1	0.05	0.04	4.29	4.33	0.04	1.09	1.13	—	4,933	4,933	0.21	0.24	0.55	5,010
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Manufacturing	0.43	0.39	0.48	3.44	0.01	0.01	0.78	0.79	0.01	0.20	0.20	—	824	824	0.04	0.04	1.52	839
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.43	0.39	0.48	3.44	0.01	0.01	0.78	0.79	0.01	0.20	0.20	—	824	824	0.04	0.04	1.52	839

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	478	478	0.03	< 0.005	—	480
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,920	1,920	0.12	0.01	—	1,927

Unrefrig erated	—	—	—	—	—	—	—	—	—	—	—	—	522	522	0.03	< 0.005	—	524
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	21.0	21.0	< 0.005	< 0.005	—	21.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,940	2,940	0.18	0.02	—	2,951
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufac turing	—	—	—	—	—	—	—	—	—	—	—	—	478	478	0.03	< 0.005	—	480
Refriger ated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,920	1,920	0.12	0.01	—	1,927
Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	522	522	0.03	< 0.005	—	524
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	21.0	21.0	< 0.005	< 0.005	—	21.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,940	2,940	0.18	0.02	—	2,951
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufac turing	—	—	—	—	—	—	—	—	—	—	—	—	79.1	79.1	< 0.005	< 0.005	—	79.4
Refriger ated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	318	318	0.02	< 0.005	—	319

Unrefrig Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	86.4	86.4	0.01	< 0.005	—	86.7
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	3.47	3.47	< 0.005	< 0.005	—	3.48
Total	—	—	—	—	—	—	—	—	—	—	—	—	487	487	0.03	< 0.005	—	489

#### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	455	455	0.04	< 0.005	—	456
Refrigerated Warehouse-No Rail	0.03	0.01	0.23	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	280	280	0.02	< 0.005	—	281
Unrefrigerated Warehouse-No Rail	0.09	0.04	0.79	0.66	< 0.005	0.06	—	0.06	0.06	—	0.06	—	944	944	0.08	< 0.005	—	947
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	1,679	1,679	0.15	< 0.005	—	1,684

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	455	455	0.04	< 0.005	—	456
Refrigerated Warehouse-No Rail	0.03	0.01	0.23	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	280	280	0.02	< 0.005	—	281
Unrefrigerated Warehouse-No Rail	0.09	0.04	0.79	0.66	< 0.005	0.06	—	0.06	0.06	—	0.06	—	944	944	0.08	< 0.005	—	947
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	1,679	1,679	0.15	< 0.005	—	1,684
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	75.3	75.3	0.01	< 0.005	—	75.6
Refrigerated Warehouse-No Rail	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	46.4	46.4	< 0.005	< 0.005	—	46.5
Unrefrigerated Warehouse-No Rail	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	156	156	0.01	< 0.005	—	157
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00



Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	278	278	0.02	< 0.005	—	279

## 4.3. Area Emissions by Source

### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.73	4.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	3.04	2.81	0.14	17.1	< 0.005	0.03	—	0.03	0.02	—	0.02	—	70.4	70.4	< 0.005	< 0.005	—	70.7
Total	8.35	8.12	0.14	17.1	< 0.005	0.03	—	0.03	0.02	—	0.02	—	70.4	70.4	< 0.005	< 0.005	—	70.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.73	4.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	5.31	5.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.86	0.86	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.38	0.35	0.02	2.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.99	7.99	< 0.005	< 0.005	—	8.01
Total	1.35	1.32	0.02	2.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.99	7.99	< 0.005	< 0.005	—	8.01

## 4.4. Water Emissions by Land Use

### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	14.6	75.9	90.5	1.51	0.04	—	139
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	14.6	75.9	90.5	1.51	0.04	—	139

Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	68.4	354	422	7.03	0.17	—	649
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	5.04	5.04	< 0.005	< 0.005	—	5.06
Total	—	—	—	—	—	—	—	—	—	—	—	97.7	511	608	10.0	0.24	—	932
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufac turing	—	—	—	—	—	—	—	—	—	—	—	14.6	75.9	90.5	1.51	0.04	—	139
Refriger ated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	14.6	75.9	90.5	1.51	0.04	—	139
Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	68.4	354	422	7.03	0.17	—	649
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	5.04	5.04	< 0.005	< 0.005	—	5.06
Total	—	—	—	—	—	—	—	—	—	—	—	97.7	511	608	10.0	0.24	—	932
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufac turing	—	—	—	—	—	—	—	—	—	—	—	2.43	12.6	15.0	0.25	0.01	—	23.0

Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	2.43	12.6	15.0	0.25	0.01	—	23.0
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	11.3	58.6	69.9	1.16	0.03	—	107
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.83	0.83	< 0.005	< 0.005	—	0.84
Total	—	—	—	—	—	—	—	—	—	—	—	16.2	84.6	101	1.66	0.04	—	154

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	22.1	0.00	22.1	2.21	0.00	—	77.3
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	16.7	0.00	16.7	1.67	0.00	—	58.6
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	78.2	0.00	78.2	7.81	0.00	—	273

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	22.1	0.00	22.1	2.21	0.00	—	77.3
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	16.7	0.00	16.7	1.67	0.00	—	58.6
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	78.2	0.00	78.2	7.81	0.00	—	273
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	3.66	0.00	3.66	0.37	0.00	—	12.8
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.77	0.00	2.77	0.28	0.00	—	9.70

Unrefrigerated Warehouse	—	—	—	—	—	—	—	—	—	—	—	12.9	0.00	12.9	1.29	0.00	—	45.3
Rail	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	19.4	0.00	19.4	1.94	0.00	—	67.8

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.61	8.61
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	881	881
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	890	890
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.61	8.61

Refrigerated Warehouse Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	881	881
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	890	890
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.42	1.42
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	146	146
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	147	147

## 4.7. Offroad Emissions By Equipment Type

### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



## 4.8. Stationary Emissions By Equipment Type

### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 4.9. User Defined Emissions By Equipment Type

### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

##### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	8/1/2022	8/11/2022	5.00	9.00	—
Grading	Grading	8/12/2022	9/5/2022	5.00	17.0	—
Building Construction	Building Construction	9/6/2022	6/9/2023	5.00	199	—
Paving	Paving	6/12/2023	7/4/2023	5.00	17.0	—
Architectural Coating	Architectural Coating	7/5/2023	7/27/2023	5.00	17.0	—

### 5.2. Off-Road Equipment

#### 5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.00	8.00	84.0	0.37
Site Preparation	Crawler Tractors	Diesel	Average	0.00	8.00	87.0	0.43
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38

Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	0.00	8.00	84.0	0.37
Grading	Crawler Tractors	Diesel	Average	3.00	8.00	87.0	0.43
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	0.00	8.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Crawler Tractors	Diesel	Average	3.00	8.00	87.0	0.43
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT

Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	165	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	64.5	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	33.1	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	330,585	110,195	12,859

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	13.5	0.00	—
Grading	—	—	42.5	0.00	—
Paving	0.00	0.00	0.00	0.00	4.92

### 5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

### 5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Manufacturing	0.00	0%
Refrigerated Warehouse-No Rail	0.00	0%
Unrefrigerated Warehouse-No Rail	0.00	0%
Other Asphalt Surfaces	3.98	100%
Parking Lot	0.94	100%

### 5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2022	0.00	532	0.03	< 0.005
2023	0.00	532	0.03	< 0.005

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
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Manufacturing	498	498	498	181,728	6,054	6,054	6,054	2,209,606
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	330,585	110,195	12,859

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

#### Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
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Manufacturing	327,955	532	0.0330	0.0040	1,419,938
Refrigerated Warehouse-No Rail	1,317,110	532	0.0330	0.0040	874,802
Unrefrigerated Warehouse-No Rail	357,906	532	0.0330	0.0040	2,945,351
Other Asphalt Surfaces	0.00	532	0.0330	0.0040	0.00
Parking Lot	14,377	532	0.0330	0.0040	0.00

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Manufacturing	7,645,125	0.00
Refrigerated Warehouse-No Rail	7,645,125	0.00
Unrefrigerated Warehouse-No Rail	35,674,938	0.00
Other Asphalt Surfaces	0.00	0.00
Parking Lot	0.00	651,289

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Manufacturing	41.0	—
Refrigerated Warehouse-No Rail	31.1	—
Unrefrigerated Warehouse-No Rail	145	—
Other Asphalt Surfaces	0.00	—
Parking Lot	0.00	—

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Manufacturing	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.00	4.00	18.0
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

### 5.15. Operational Off-Road Equipment

#### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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### 5.16. Stationary Sources

#### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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#### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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### 5.17. User Defined

Equipment Type	Fuel Type
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### 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	26.9	annual days of extreme heat
Extreme Precipitation	2.90	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	18.5	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi. Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters. Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

## 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

## 6.4. Climate Risk Reduction Measures

# 7. Health and Equity Details

## 7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	98.7
AQ-PM	60.6
AQ-DPM	86.2
Drinking Water	10.2
Lead Risk Housing	49.5
Pesticides	0.00
Toxic Releases	59.1
Traffic	60.2
Effect Indicators	—
CleanUp Sites	58.2
Groundwater	0.00
Haz Waste Facilities/Generators	53.5
Impaired Water Bodies	0.00
Solid Waste	0.00

Sensitive Population	—
Asthma	55.7
Cardio-vascular	70.2
Low Birth Weights	37.2
Socioeconomic Factor Indicators	—
Education	78.6
Housing	83.9
Linguistic	60.6
Poverty	80.8
Unemployment	82.7

## 7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	8.892595919
Employed	15.11612986
Median HI	22.04542538
Education	—
Bachelor's or higher	6.659822918
High school enrollment	100
Preschool enrollment	49.55729501
Transportation	—
Auto Access	49.51879892
Active commuting	57.6799692
Social	—
2-parent households	16.66880534
Voting	4.683690491



Neighborhood	—
Alcohol availability	31.19466188
Park access	16.48915694
Retail density	26.22866675
Supermarket access	94.25125112
Tree canopy	3.58013602
Housing	—
Homeownership	45.34838958
Housing habitability	19.74849224
Low-inc homeowner severe housing cost burden	5.3124599
Low-inc renter severe housing cost burden	20.28743744
Uncrowded housing	20.37726165
Health Outcomes	—
Insured adults	11.15103298
Arthritis	27.4
Asthma ER Admissions	31.4
High Blood Pressure	18.2
Cancer (excluding skin)	66.1
Asthma	9.8
Coronary Heart Disease	37.1
Chronic Obstructive Pulmonary Disease	15.6
Diagnosed Diabetes	22.3
Life Expectancy at Birth	4.6
Cognitively Disabled	38.1
Physically Disabled	20.3
Heart Attack ER Admissions	27.8
Mental Health Not Good	13.8
Chronic Kidney Disease	27.1

Obesity	7.1
Pedestrian Injuries	75.9
Physical Health Not Good	17.0
Stroke	19.7
Health Risk Behaviors	—
Binge Drinking	65.1
Current Smoker	9.9
No Leisure Time for Physical Activity	13.9
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	6.8
Elderly	52.4
English Speaking	24.1
Foreign-born	57.7
Outdoor Workers	10.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	70.2
Traffic Density	78.7
Traffic Access	67.4
Other Indices	—
Hardship	89.7
Other Decision Support	—
2016 Voting	8.9

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	69.0

Healthy Places Index Score for Project Location (b)	11.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.  
 b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

### 7.4. Health & Equity Measures

No Health & Equity Measures selected.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

### 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

## 8. User Changes to Default Data

Screen	Justification
Land Use	Consistent with the DEIR's model.
Construction: Construction Phases	See comment on: "Unsubstantiated Changes to Individual Construction Phase Lengths".
Construction: Off-Road Equipment	Consistent with DEIR's model.
Operations: Vehicle Data	See comment on: "Unsubstantiated Saturday and Sunday Operational Vehicle Trips".
Operations: Energy Use	Consistent with DEIR's model.



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**Matthew F. Hagemann, P.G., C.Hg., QSD, QSP**

**Geologic and Hydrogeologic Characterization  
Investigation and Remediation Strategies  
Litigation Support and Testifying Expert  
Industrial Stormwater Compliance  
CEQA Review**

**Education:**

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

**Professional Certifications:**

California Professional Geologist

California Certified Hydrogeologist

Qualified SWPPP Developer and Practitioner

**Professional Experience:**

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

#### **Executive Director:**

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

#### **Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

### **Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.

- Established national protocol for the peer review of scientific documents.

### **Geology:**

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

### **Teaching:**

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

### **Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F.**, 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).



**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

**Hagemann, M.F.**, 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F.**, 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F.**, 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F.**, 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F.**, 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

**Hagemann, M.F.**, 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F.**, and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F.**, 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F.**, 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F.**, and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F.**, Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M. F.**, Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F.**, 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.F.** and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F.**, 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

**Hagemann, M.F.**, 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.



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***Paul Rosenfeld, Ph.D.***

*Principal Environmental Chemist*

**Chemical Fate and Transport & Air Dispersion Modeling**

**Risk Assessment & Remediation Specialist**

**Education**

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

**Professional Experience**

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

## **Professional History:**

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner  
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)  
UCLA School of Public Health; 2003 to 2006; Adjunct Professor  
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator  
UCLA Institute of the Environment, 2001-2002; Research Associate  
Komex H<sub>2</sub>O Science, 2001 to 2003; Senior Remediation Scientist  
National Groundwater Association, 2002-2004; Lecturer  
San Diego State University, 1999-2001; Adjunct Professor  
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager  
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager  
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor  
King County, Seattle, 1996 – 1999; Scientist  
James River Corp., Washington, 1995-96; Scientist  
Big Creek Lumber, Davenport, California, 1995; Scientist  
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist  
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

## **Publications:**

**Rosenfeld P. E.**, Spaeth K., Hallman R., Bressler R., Smith, G., (2022) [Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers](#). *Water Air Soil Pollution*. **233**, 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermid and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

**Rosenfeld, P.E.** & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

**Rosenfeld, P.E.**, J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

**Rosenfeld, P. E.**, M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing

**Rosenfeld, P.E.**, and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

**Rosenfeld P. E.**, J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

**Rosenfeld, P.E.**, and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

**Rosenfeld, P.E.**, and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49( 9), 171-178.

**Rosenfeld, P. E.**, Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

**Rosenfeld, P.E.**, Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS-6), Sacramento, CA Publication #442-02-008.

**Rosenfeld, P.E.**, and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

**Rosenfeld, P.E.**, and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

**Rosenfeld, P.E.**, C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

**Rosenfeld, P.E.**, and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

**Rosenfeld, P.E.**, and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

**Rosenfeld, P. E.** (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

**Rosenfeld, P. E.** (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

**Rosenfeld, P. E.** (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

**Rosenfeld, P. E.** (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

**Rosenfeld, P. E.** (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

## **Presentations:**

**Rosenfeld, P.E.**, "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

**Rosenfeld, P.E.**, Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

**Rosenfeld, P.E.** (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

**Rosenfeld, P.E.** (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

**Rosenfeld, P. E.** (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld P. E.** (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

**Rosenfeld P. E.** (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

**Paul Rosenfeld Ph.D.** (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

**Paul Rosenfeld Ph.D.** (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

**Paul Rosenfeld Ph.D.** (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation*. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.



**Paul Rosenfeld, Ph.D.** (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

**Paul Rosenfeld, Ph.D.** (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

**Rosenfeld, P. E.**, Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference Orlando, FL*.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

**Paul Rosenfeld, Ph.D.** (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

**Paul Rosenfeld, Ph.D.** (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

**Rosenfeld, P.E.** and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

**Rosenfeld, P.E.** (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

**Rosenfeld, P.E.** (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

**Rosenfeld, P.E.** (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E.**, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.**, and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

**Rosenfeld, P.E.,** C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.,** C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

## **Teaching Experience:**

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

## **Academic Grants Awarded:**

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

## **Deposition and/or Trial Testimony:**

In the Superior Court of the State of California, County of San Bernardino  
Billy Wildrick, Plaintiff vs. BNSF Railway Company  
Case No. CIVDS1711810  
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia  
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company  
Case No. 10-SCCV-092007  
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana  
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.  
Case No. 2020-03891  
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division  
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad  
Case No. 18-LV-CC0020  
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division  
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.  
Case No. 20-CA-5502  
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri  
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.  
Case No. 19SL-CC03191  
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division  
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.  
Case No. NO. 20-CA-0049  
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District  
Greg Bean, Plaintiff vs. Soo Line Railroad Company  
Case No. 69-DU-CV-21-760  
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington  
John D. Fitzgerald Plaintiff vs. BNSF  
Case No. 3:21-cv-05288-RJB  
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois  
Rocky Bennyhoff Plaintiff vs. Norfolk Southern  
Case No. 20-L-56  
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio  
Joe Briggins Plaintiff vs. CSX  
Case No. A2004464  
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern  
George LaFazia vs. BNSF Railway Company.  
Case No. BCV-19-103087  
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois  
Bobby Earles vs. Penn Central et. al.  
Case No. 2020-L-000550  
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida  
Albert Hartman Plaintiff vs. Illinois Central  
Case No. 2:20-cv-1633  
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4<sup>th</sup> Judicial Circuit, in and For Duval County, Florida  
Barbara Steele vs. CSX Transportation  
Case No.16-219-Ca-008796  
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York  
Romano et al. vs. Northrup Grumman Corporation  
Case No. 16-cv-5760  
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois  
Linda Benjamin vs. Illinois Central  
Case No. No. 2019 L 007599  
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois  
Donald Smith vs. Illinois Central  
Case No. No. 2019 L 003426  
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois  
Jan Holeman vs. BNSF  
Case No. 2019 L 000675  
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia  
Dwayne B. Garrett vs. Norfolk Southern  
Case No. 20-SCCV-091232  
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois  
Joseph Ruepke vs. BNSF  
Case No. 2019 L 007730  
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska  
Steven Gillett vs. BNSF  
Case No. 4:20-cv-03120  
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County  
James Eadus vs. Soo Line Railroad and BNSF  
Case No. DV 19-1056  
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois  
Martha Custer et al.cvs. Cerro Flow Products, Inc.  
Case No. 0i9-L-2295  
Rosenfeld Deposition 5-14-2021  
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois  
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,  
Case No. 18-L-6845  
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois  
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail  
Case No. 17-cv-8517  
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cuntly of Maricopa  
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.  
Case No. CV20127-094749  
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division  
Robinson, Jeremy et al vs. CNA Insurance Company et al.  
Case No. 1:17-cv-000508  
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino  
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.  
Case No. 1720288  
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse  
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.  
Case No. 18STCV01162  
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri  
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.  
Case No. 1716-CV10006  
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey  
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.  
Case No. 2:17-cv-01624-ES-SCM  
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division  
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido” Defendant.  
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237  
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica  
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants  
Case No. BC615636  
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica  
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants  
Case No. BC646857  
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado  
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants  
Case No. 1:16-cv-02531-RBJ  
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112<sup>th</sup> Judicial District  
Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants  
Cause No. 1923  
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa  
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants  
Cause No. C12-01481  
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois  
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants  
Case No.: No. 0i9-L-2295  
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi  
Guy Manuel vs. The BP Exploration et al., Defendants  
Case No. 1:19-cv-00315-RHW  
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles  
Warrn Gilbert and Penny Gilbert, Plaintiff vs. BMW of North America LLC  
Case No. LC102019 (c/w BC582154)  
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division  
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants  
Case No. 4:16-cv-52-DMB-JVM  
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish  
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants  
Case No. 13-2-03987-5  
Rosenfeld Deposition, February 2017  
Trial March 2017

In The Superior Court of the State of California, County of Alameda  
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants  
Case No. RG14711115  
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County  
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants  
Case No. LALA002187  
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia  
Robert Andrews, et al. v. Antero, et al.  
Civil Action No. 14-C-30000  
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County  
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant  
Case No. 4980  
Rosenfeld Deposition May 2015

In the Circuit Court of the 17<sup>th</sup> Judicial Circuit, in and For Broward County, Florida  
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.  
Case No. CACE07030358 (26)  
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas  
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.  
Case No. cc-11-01650-E  
Rosenfeld Deposition: March and September 2013  
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio  
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants  
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)  
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division  
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.  
Civil Action No. 2:09-cv-232-WHA-TFM  
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama  
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants  
Civil Action No. CV 2008-2076  
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division  
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.  
Case No. 2:07CV1052  
Rosenfeld Deposition July 2009

# ATTACHMENT 1

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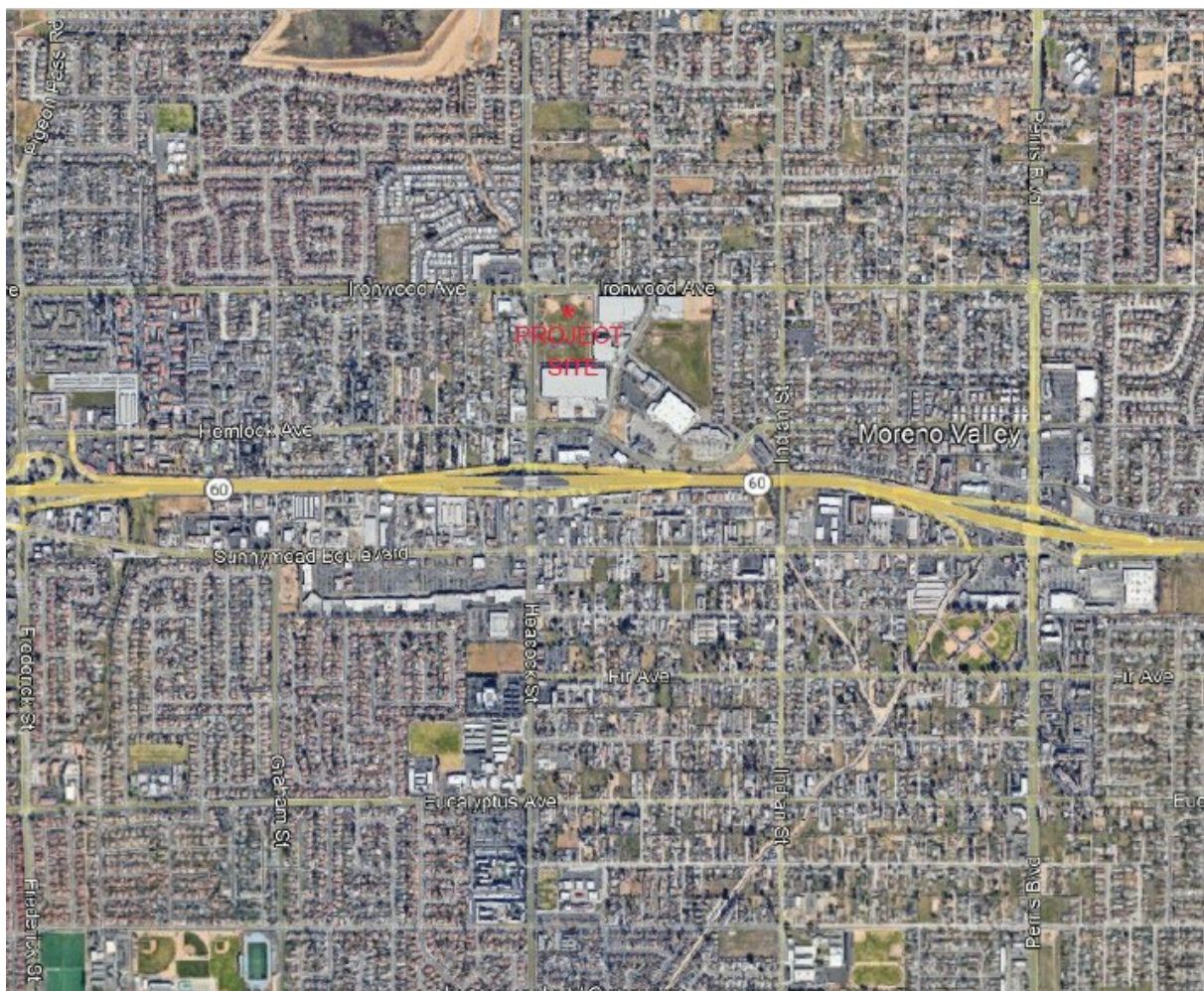
# TECHNICAL MEMORANDUM

**DATE:** May 20, 2025  
**TO:** Ryan Martin, LCG 10MV, LLC. c/o Ledo Capital Group  
**FROM:** Jose Alire, Urban Crossroads, Inc.  
**JOB NO:** 14397D-01 Festival at Moreno Valley Qing Eval

## **SUBJECT: FESTIVAL AT MORENO VALLEY QUEUING EVALUATION**

Urban Crossroads is pleased to provide this qualitative evaluation of truck queuing for heavy vehicles arriving at the truck entry to the Festival at Moreno Valley Project (Project). The project is located in the City of Moreno Valley. The project location is shown on **Exhibit 1**. The project is located at the southeast corner of Heacock Street and Ironwood Avenue.

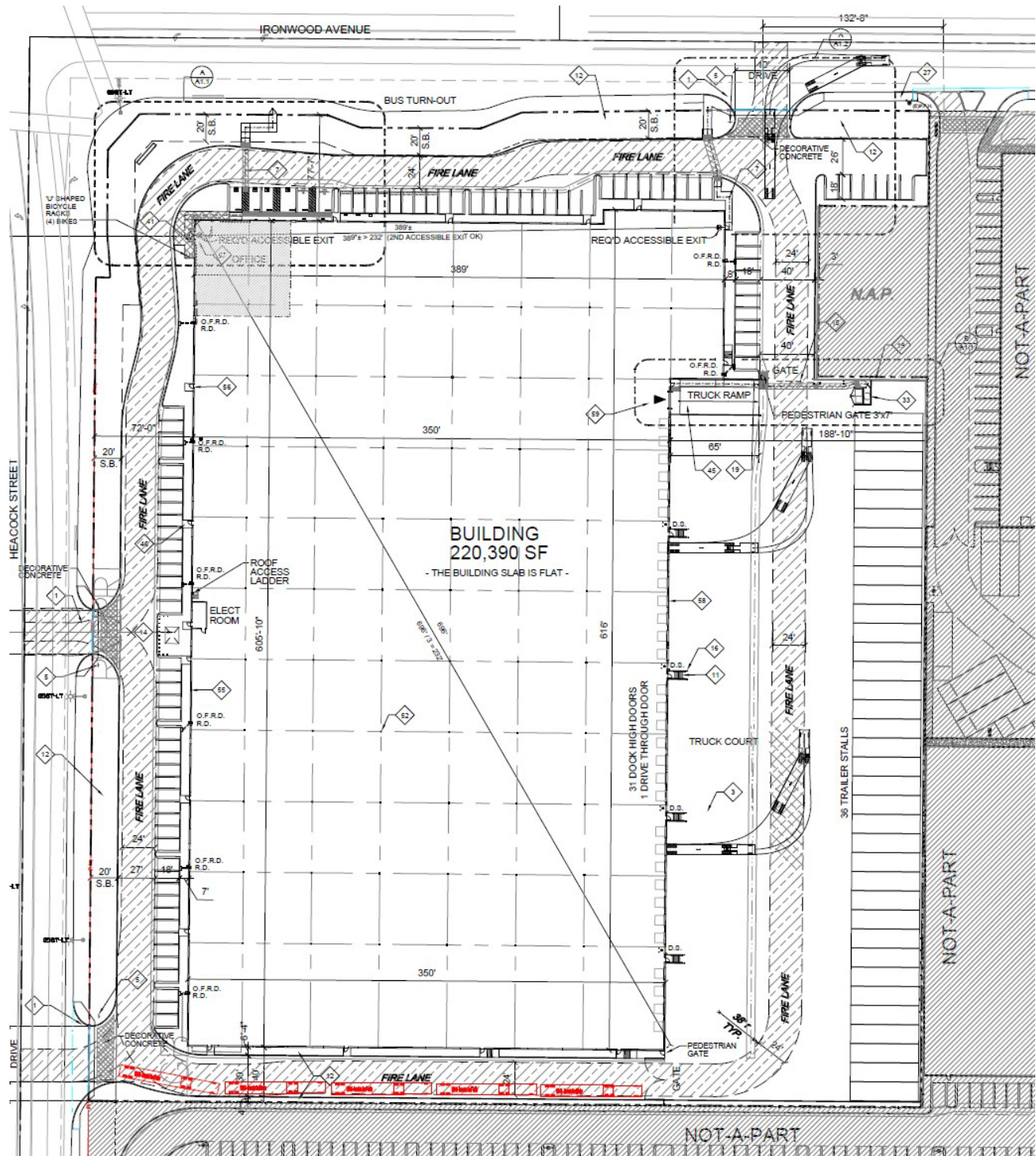
### **EXHIBIT 1: LOCATION MAP**





**Exhibit 2.** presents the Project site plan. The Project site plan was provided to Urban Crossroads, Inc. by the site plan engineer. The proposed project is a 220,390 square feet light industrial building. The truck entry is provided by a driveway from Heacock Street located at the southwest corner of the site. The truck docks and parking are located along the east side of building. Trucks will then exit via a driveway providing right turn out truck access to Ironwood Avenue.

## EXHIBIT 2: PROJECT SITE PLAN



The project scoping form attachments include a trip generation estimate. The peak hour inbound truck volumes are 1 – 2 vehicles per hour. The peak hour trucks are anticipated to be 4+ axle trucks. The daily truck volume is 128 vehicles per day. The daily total includes 2-axle, 3-axle, and 4+-axle trucks.

The 95<sup>th</sup> percentile queue length is calculated as 2 times the average number of trucks. The maximum hourly truck volume for purposes of queueing evaluation is 4 trucks per hour. As shown on Exhibit 2, the project entry can accommodate up to 5 trucks at any given time. This queuing capacity is more than adequate for the anticipated 95<sup>th</sup> percentile demand of 4 trucks for the entire hour.

If you have any questions, please contact me directly at [jalire@urbanxroads.com](mailto:jalire@urbanxroads.com).

JA:CW:RV

## **ATTACHMENT 2**

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# TECHNICAL MEMORANDUM

**DATE:** May 13, 2025  
**TO:** Charly Ray, Applied Planning, Inc.  
**FROM:** Haseeb Qureshi, Ali Dadabhoy, Urban Crossroads, Inc.  
**JOB NO:** 14397-02 AQ & GHG Assessment

## **SUBJECT: MORENO VALLEY BUSINESS PARK – PHASE II AIR QUALITY AND GREENHOUSE GAS ASSESSMENT**

Urban Crossroads, Inc. is pleased to provide the following Air Quality and Greenhouse Gas Assessment for the Moreno Valley Business Park – Phase II (**Project**), which is located immediately southeasterly of Ironwood Avenue at Heacock Street in the City of Moreno Valley.

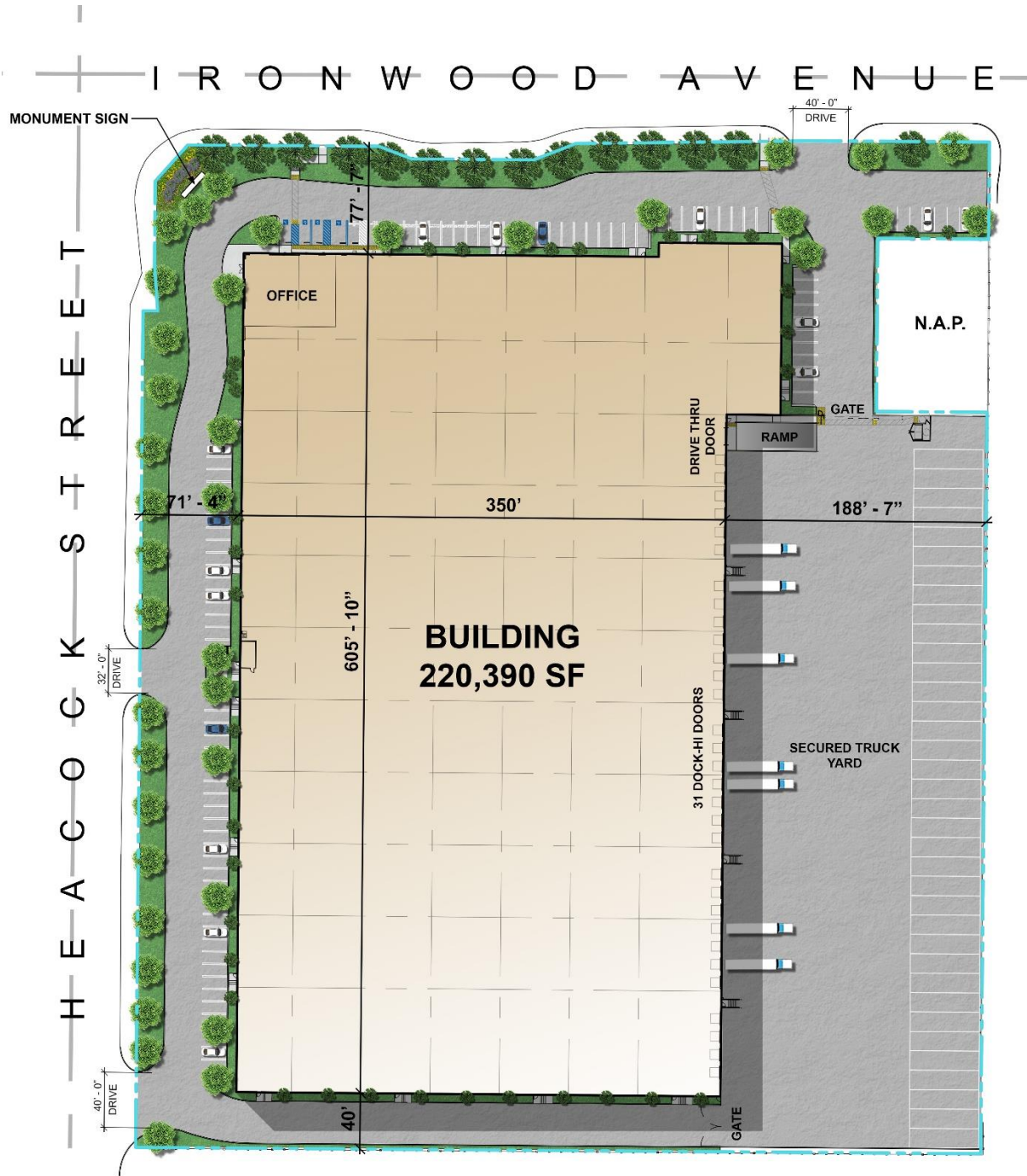
### **PROJECT OVERVIEW**

The Project is proposed to consist of a single 220,390 sf industrial building (Building 5) which will be evaluated assuming 154,270 sf of warehousing use (70% of the overall sf), 33,060 sf of manufacturing use (15% of the overall sf), and 33,060 sf of high-cube cold storage warehouse use (15% of the overall sf) for a total of 220,390 sf of industrial uses, as shown in Exhibit 1.

### **SUMMARY OF FINDINGS**

Results of the assessment indicate that the Project would result in a less than significant impact with respect to air quality and greenhouse gases.

# EXHIBIT 1: SITE PLAN





## BACKGROUND

In May 2022, the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of the CalEEMod Version 2022. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NOX, SOX, CO, PM10, and PM2.5) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from MMs.

The previously completed Moreno Valley Business Park – Phase II Air Quality Impact Analysis (dated January 17, 2022) and Moreno Valley Business Park – Phase II Greenhouse Gas Analysis (dated January 17, 2022) (referred to herein as “technical studies”) were prepared before the release of CalEEMod Version 2022. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational emissions. Output from the model runs for both construction and operational activity are provided in Appendix 1.

Construction emissions were modeled in CalEEMod 2022 utilizing updated grading quantities and construction schedule consistent with the updated Project opening year of 2027. Operational emissions were also modeled utilizing the updated 2027 opening year.

## PROJECT AIR QUALITY IMPACTS

The estimated maximum daily construction and operational emissions are summarized in Table 1 and 2. Detailed construction and operational model outputs are presented in Appendix 1. Under the assumed scenarios, emissions resulting from the Project construction and operations will not exceed thresholds established by the SCAQMD for emissions of any criteria pollutant.

**TABLE 1: REGIONAL CONSTRUCTION EMISSIONS SUMMARY**

Year	Emissions (lbs/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub> T	PM <sub>2.5</sub> T
Summer						
2026	3.91	34.71	32.27	0.07	7.67	4.37
2027	30.65	23.23	35.75	0.05	2.96	1.42
Winter						
2026	2.06	16.24	21.08	0.03	2.30	1.11
2027	1.93	15.15	20.57	0.03	2.20	1.02
Maximum Daily Emissions	30.65	34.71	35.75	0.07	7.67	4.37
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

**TABLE 2: TOTAL PROJECT REGIONAL OPERATIONAL EMISSIONS**

Source	Emissions (lbs/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub> T	PM <sub>2.5</sub> T
Summer						
Mobile	1.63	13.39	17.89	0.16	7.80	2.20
Area	6.88	0.08	9.59	0.00	0.02	0.01
Energy	0.08	1.41	1.18	0.01	0.11	0.11
TRUs	0.07	0.77	0.92	0.00	0.01	0.01
Cargo Handling Equipment	0.12	0.38	16.44	0.00	0.03	0.03
Maximum Daily Emissions	8.78	16.02	46.02	0.17	7.97	2.36
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Mobile	1.57	14.02	15.45	0.15	7.80	2.20
Area	5.31	0.00	0.00	0.00	0.00	0.00
Energy	0.08	1.41	1.18	0.01	0.11	0.11
TRUs	0.07	0.77	0.92	0.00	0.01	0.01
Cargo Handling Equipment	0.12	0.38	16.44	0.00	0.03	0.03
Maximum Daily Emissions	7.14	16.57	33.99	0.16	7.95	2.34
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

## LOCALIZED EMISSIONS

Emissions during peak construction and operational activity will not exceed the SCAQMD's localized significance thresholds as illustrated on Table 3 and 4. As such, the Project's localized impacts during construction and operational activity would be less than significant.



**TABLE 3: CONSTRUCTION LOCALIZED SIGNIFICANCE SUMMARY CONSTRUCTION**

Construction Phase	Year	Emissions (lbs/day)			
		NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Site Preparation	2026	34.61	31.01	7.43	4.31
	Maximum Daily Emissions	34.61	31.01	7.43	4.31
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Grading	2026	19.06	19.09	3.30	1.89
	Maximum Daily Emissions	19.06	19.09	3.30	1.89
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Building Construction	2026	14.76	15.71	0.80	0.74
	2027	13.75	15.61	0.70	0.64
	Maximum Daily Emissions	14.76	15.71	0.80	0.74
	SCAQMD Localized Threshold	270	1,577	19	8
Paving	2026	6.94	9.95	0.30	0.27
	Maximum Daily Emissions	6.94	9.95	0.30	0.27
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO
Architectural Coating	2026	1.11	1.50	0.03	0.02
	Maximum Daily Emissions	1.11	1.50	0.03	0.02
	SCAQMD Localized Threshold	270	1,577	19	8
	Threshold Exceeded?	NO	NO	NO	NO

**TABLE 4: OPERATIONAL LOCALIZED SIGNIFICANCE SUMMARY OPERATIONS**

Scenario	Emissions (lbs/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Summer	2.57	28.15	0.54	0.26
Winter	2.52	18.45	0.53	0.24
Maximum Daily Emissions	2.57	28.15	0.54	0.26
SCAQMD Localized Threshold	270	1,577	5	2
Threshold Exceeded?	NO	NO	NO	NO

## GHG IMPACTS

Greenhouse gas emissions resulting from construction and operation of the proposed Project was also modeled using CalEEMod 2022. For the operational phase of the proposed Project, an opening year of 2027 has been assumed as previously noted. However, all other assumptions and inputs remain consistent with the previous technical studies.

Tables 5 below presents the construction and operational GHG emissions from CalEEMod 2022. Detailed construction and operational model outputs are presented in Appendix 1.

**TABLE 5: TOTAL PROJECT GHG EMISSIONS**

Source	Emissions (MT/yr)				
	CO <sub>2</sub> T	CH <sub>4</sub>	N <sub>2</sub> O	R	Total CO <sub>2</sub> e
Annual construction emissions amortized over 30 years	21.64	6.64E-04	1.07E-03	1.19E-02	21.98
Mobile	2011.14	0.04	0.25	2.51	2090.02
Area	4.47	0.00	0.00	0.00	4.49
Energy	558.38	0.05	0.00	0.00	560.78
Water	70.65	1.66	0.04	0.00	124.15
Waste	19.37	1.94	0.00	0.00	67.77
Refrigerants	0.00	0.00	0.00	6.09	6.09
TRUs	0.00	0.00	0.00	0.00	19.24
Cargo Handling Equipment	0.00	0.00	0.00	0.00	47.37
Total CO <sub>2</sub> e (All Sources)	2,941.90				

## CONCLUSION

In summary, results of the assessment indicate that the Project would result in a less than significant impact with respect to air quality and greenhouse gases.

If you have any questions, please contact me directly at [hqureshi@urbanxroads.com](mailto:hqureshi@urbanxroads.com).

**APPENDIX 1:**

**CALEEMOD PROPOSED PROJECT EMISSIONS MODEL OUTPUTS**

# 14397 Moreno Valley Business Park - Phase II Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	14397 Moreno Valley Business Park - Phase II
Construction Start Date	8/3/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	10.0
Location	33.945441, -117.242648
County	Riverside-South Coast
City	Moreno Valley
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5594
EDFZ	11
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Manufacturing	33.1	1000sqft	0.76	33,060	0.00	—	—	—

Refrigerated Warehouse-No Rail	33.1	1000sqft	0.76	33,060	0.00	—	—	—
Unrefrigerated Warehouse-No Rail	154	1000sqft	3.54	154,270	0.00	—	—	—
Other Asphalt Surfaces	173	1000sqft	3.98	0.00	0.00	—	—	—
Parking Lot	134	Space	0.94	0.00	0.00	—	—	—
User Defined Industrial	220	User Defined Unit	0.00	0.00	0.00	—	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	31.2	30.7	34.7	35.7	0.07	1.77	5.90	7.67	1.62	2.74	4.37	—	9,780	9,780	0.26	1.06	14.0	10,117
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.45	2.06	16.2	21.1	0.03	0.82	1.48	2.30	0.75	0.36	1.11	—	4,943	4,943	0.15	0.22	0.18	5,012
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.03	3.86	6.78	9.45	0.02	0.31	0.70	0.99	0.29	0.23	0.50	—	2,169	2,169	0.07	0.11	1.17	2,198
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.74	0.70	1.24	1.72	< 0.005	0.06	0.13	0.18	0.05	0.04	0.09	—	359	359	0.01	0.02	0.19	364

## 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	4.64	3.91	34.7	32.3	0.07	1.77	5.90	7.67	1.62	2.74	4.37	—	9,780	9,780	0.26	1.06	14.0	10,117
2027	31.2	30.7	23.2	35.7	0.05	1.04	1.92	2.96	0.96	0.46	1.42	—	7,147	7,147	0.22	0.24	7.71	7,231
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.45	2.06	16.2	21.1	0.03	0.82	1.48	2.30	0.75	0.36	1.11	—	4,943	4,943	0.15	0.22	0.18	5,012
2027	2.30	1.93	15.1	20.6	0.03	0.72	1.48	2.20	0.66	0.36	1.02	—	4,905	4,905	0.15	0.21	0.16	4,971
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.81	0.67	5.88	6.61	0.01	0.29	0.70	0.99	0.26	0.23	0.50	—	1,751	1,751	0.05	0.11	0.98	1,785
2027	4.03	3.86	6.78	9.45	0.02	0.31	0.65	0.96	0.29	0.16	0.45	—	2,169	2,169	0.07	0.09	1.17	2,198
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.15	0.12	1.07	1.21	< 0.005	0.05	0.13	0.18	0.05	0.04	0.09	—	290	290	0.01	0.02	0.16	296
2027	0.74	0.70	1.24	1.72	< 0.005	0.06	0.12	0.18	0.05	0.03	0.08	—	359	359	0.01	0.01	0.19	364

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	9.15	8.60	14.9	28.7	0.17	0.36	7.57	7.92	0.34	1.98	2.32	215	20,339	20,554	22.4	2.32	84.2	21,889
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	7.38	6.95	15.4	16.6	0.16	0.34	7.57	7.91	0.33	1.98	2.31	215	20,061	20,275	22.4	2.33	38.0	21,567
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.06	7.63	12.0	19.6	0.12	0.29	5.59	5.88	0.28	1.46	1.74	215	15,876	16,091	22.3	1.79	52.0	17,234
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.47	1.39	2.18	3.58	0.02	0.05	1.02	1.07	0.05	0.27	0.32	35.5	2,628	2,664	3.69	0.30	8.60	2,853

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.98	1.63	13.4	17.9	0.16	0.23	7.57	7.80	0.22	1.98	2.20	—	16,598	16,598	0.32	2.06	47.5	17,266
Area	7.01	6.88	0.08	9.59	< 0.005	0.02	—	0.02	0.01	—	0.01	—	39.4	39.4	< 0.005	< 0.005	—	39.6
Energy	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	3,373	3,373	0.31	0.02	—	3,387
Water	—	—	—	—	—	—	—	—	—	—	—	97.7	329	427	10.0	0.24	—	750
Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	36.8	36.8
Total	9.15	8.60	14.9	28.7	0.17	0.36	7.57	7.92	0.34	1.98	2.32	215	20,339	20,554	22.4	2.32	84.2	21,889
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.92	1.57	14.0	15.4	0.15	0.23	7.57	7.80	0.22	1.98	2.20	—	16,359	16,359	0.32	2.06	1.23	16,983
Area	5.31	5.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	3,373	3,373	0.31	0.02	—	3,387
Water	—	—	—	—	—	—	—	—	—	—	—	97.7	329	427	10.0	0.24	—	750
Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	36.8	36.8

Total	7.38	6.95	15.4	16.6	0.16	0.34	7.57	7.91	0.33	1.98	2.31	215	20,061	20,275	22.4	2.33	38.0	21,567
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.42	1.17	10.5	11.9	0.11	0.17	5.59	5.76	0.17	1.46	1.63	—	12,147	12,147	0.24	1.53	15.2	12,624
Area	6.48	6.39	0.06	6.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.0	27.0	< 0.005	< 0.005	—	27.1
Energy	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	3,373	3,373	0.31	0.02	—	3,387
Water	—	—	—	—	—	—	—	—	—	—	—	97.7	329	427	10.0	0.24	—	750
Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	36.8	36.8
Total	8.06	7.63	12.0	19.6	0.12	0.29	5.59	5.88	0.28	1.46	1.74	215	15,876	16,091	22.3	1.79	52.0	17,234
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.26	0.21	1.91	2.17	0.02	0.03	1.02	1.05	0.03	0.27	0.30	—	2,011	2,011	0.04	0.25	2.51	2,090
Area	1.18	1.17	0.01	1.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.47	4.47	< 0.005	< 0.005	—	4.49
Energy	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	558	558	0.05	< 0.005	—	561
Water	—	—	—	—	—	—	—	—	—	—	—	16.2	54.5	70.6	1.66	0.04	—	124
Waste	—	—	—	—	—	—	—	—	—	—	—	19.4	0.00	19.4	1.94	0.00	—	67.8
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.09	6.09
Total	1.47	1.39	2.18	3.58	0.02	0.05	1.02	1.07	0.05	0.27	0.32	35.5	2,628	2,664	3.69	0.30	8.60	2,853

### 3. Construction Emissions Details

#### 3.1. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	4.56	3.83	34.6	31.0	0.05	1.77	—	1.77	1.62	—	1.62	—	5,532	5,532	0.22	0.04	—	5,551
Dust From Material Movement	—	—	—	—	—	—	5.66	5.66	—	2.69	2.69	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.95	0.85	< 0.005	0.05	—	0.05	0.04	—	0.04	—	152	152	0.01	< 0.005	—	152
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.17	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	25.1	25.1	< 0.005	< 0.005	—	25.2
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	1.26	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	241	241	0.01	0.01	0.82	245
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	30.1	30.1	< 0.005	< 0.005	0.08	31.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.16	6.16	< 0.005	< 0.005	0.01	6.24
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.82	0.82	< 0.005	< 0.005	< 0.005	0.86
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.02	1.02	< 0.005	< 0.005	< 0.005	1.03
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.14	0.14	< 0.005	< 0.005	< 0.005	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.3. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.57	2.16	19.1	19.1	0.03	1.04	—	1.04	0.96	—	0.96	—	3,135	3,135	0.13	0.03	—	3,146



Dust From Material Movement	—	—	—	—	—	—	2.27	2.27	—	0.94	0.94	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.04	1.05	< 0.005	0.06	—	0.06	0.05	—	0.05	—	172	172	0.01	< 0.005	—	172
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.19	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	28.4	28.4	< 0.005	< 0.005	—	28.5
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	1.08	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	207	207	0.01	0.01	0.70	210

Vendor	< 0.005	< 0.005	0.10	0.03	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	90.3	90.3	< 0.005	0.01	0.25	94.8
Hauling	0.27	0.10	6.99	1.71	0.04	0.12	1.70	1.82	0.12	0.48	0.60	—	6,348	6,348	0.12	1.01	13.0	6,666
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.6	10.6	< 0.005	< 0.005	0.02	10.7
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.95	4.95	< 0.005	< 0.005	0.01	5.19
Hauling	0.01	0.01	0.40	0.09	< 0.005	0.01	0.09	0.10	0.01	0.03	0.03	—	348	348	0.01	0.06	0.31	365
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.75	1.75	< 0.005	< 0.005	< 0.005	1.77
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.82	0.82	< 0.005	< 0.005	< 0.005	0.86
Hauling	< 0.005	< 0.005	0.07	0.02	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	57.6	57.6	< 0.005	0.01	0.05	60.4

### 3.5. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.99	1.67	14.8	15.7	0.03	0.80	—	0.80	0.74	—	0.74	—	2,805	2,805	0.11	0.02	—	2,815
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	1.99	1.67	14.8	15.7	0.03	0.80	—	0.80	0.74	—	0.74	—	2,805	2,805	0.11	0.02	—	2,815
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43	0.36	3.15	3.35	0.01	0.17	—	0.17	0.16	—	0.16	—	598	598	0.02	< 0.005	—	600
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.57	0.61	< 0.005	0.03	—	0.03	0.03	—	0.03	—	99.1	99.1	< 0.005	< 0.005	—	99.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.44	0.39	0.36	6.65	0.00	0.00	1.21	1.21	0.00	0.28	0.28	—	1,277	1,277	0.05	0.04	4.32	1,295
Vendor	0.04	0.02	1.03	0.32	0.01	0.01	0.27	0.29	0.01	0.08	0.09	—	963	963	0.02	0.15	2.63	1,011
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.42	0.37	0.41	5.04	0.00	0.00	1.21	1.21	0.00	0.28	0.28	—	1,174	1,174	0.02	0.05	0.11	1,188
Vendor	0.04	0.02	1.07	0.33	0.01	0.01	0.27	0.29	0.01	0.08	0.09	—	964	964	0.02	0.15	0.07	1,009
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.09	0.08	0.09	1.12	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	254	254	< 0.005	0.01	0.40	257
Vendor	0.01	< 0.005	0.23	0.07	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	206	206	< 0.005	0.03	0.24	215
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.02	0.21	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	42.0	42.0	< 0.005	< 0.005	0.07	42.5
Vendor	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	34.0	34.0	< 0.005	0.01	0.04	35.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.7. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.86	1.56	13.8	15.6	0.03	0.70	—	0.70	0.64	—	0.64	—	2,806	2,806	0.11	0.02	—	2,816
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.86	1.56	13.8	15.6	0.03	0.70	—	0.70	0.64	—	0.64	—	2,806	2,806	0.11	0.02	—	2,816
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.77	0.64	5.68	6.44	0.01	0.29	—	0.29	0.27	—	0.27	—	1,159	1,159	0.05	0.01	—	1,163
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.04	1.18	< 0.005	0.05	—	0.05	0.05	—	0.05	—	192	192	0.01	< 0.005	—	192
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.42	0.37	0.32	6.15	0.00	0.00	1.21	1.21	0.00	0.28	0.28	—	1,253	1,253	0.01	0.04	3.89	1,270
Vendor	0.04	0.02	0.99	0.31	0.01	0.01	0.27	0.29	0.01	0.08	0.09	—	946	946	0.02	0.14	2.41	991
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.40	0.35	0.36	4.65	0.00	0.00	1.21	1.21	0.00	0.28	0.28	—	1,152	1,152	0.02	0.04	0.10	1,166
Vendor	0.04	0.02	1.03	0.32	0.01	0.01	0.27	0.29	0.01	0.08	0.09	—	946	946	0.02	0.14	0.06	989
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.14	0.17	2.01	0.00	0.00	0.50	0.50	0.00	0.12	0.12	—	482	482	0.01	0.02	0.69	488
Vendor	0.02	0.01	0.43	0.13	< 0.005	0.01	0.11	0.12	0.01	0.03	0.04	—	391	391	0.01	0.06	0.43	409
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.37	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	79.8	79.8	< 0.005	< 0.005	0.11	80.8
Vendor	< 0.005	< 0.005	0.08	0.02	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	64.7	64.7	< 0.005	0.01	0.07	67.7

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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### 3.9. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.64	0.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	1.00	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	203	203	< 0.005	0.01	0.63	206
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.4	10.4	< 0.005	< 0.005	0.01	10.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.72	1.72	< 0.005	< 0.005	< 0.005	1.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.11. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.18	0.15	1.11	1.50	< 0.005	0.03	—	0.03	0.02	—	0.02	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	27.0	27.0	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.12	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19.5	19.5	< 0.005	< 0.005	—	19.6
Architectural Coatings	2.96	2.96	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.23	3.23	< 0.005	< 0.005	—	3.24
Architectural Coatings	0.54	0.54	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	1.23	0.00	0.00	0.24	0.24	0.00	0.06	0.06	—	251	251	< 0.005	0.01	0.78	254
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	25.6	25.6	< 0.005	< 0.005	0.04	25.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.23	4.23	< 0.005	< 0.005	0.01	4.29
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.06	0.03	1.65	0.41	0.02	0.03	0.55	0.58	0.03	0.15	0.18	—	1,786	1,786	0.03	0.27	4.54	1,872

Refrigerated Warehouse-No Rail	0.09	0.07	1.36	0.67	0.01	0.02	0.61	0.64	0.02	0.16	0.19	—	1,376	1,376	0.02	0.18	6.28	1,435
Unrefrigerated Warehouse-No Rail	0.39	0.21	9.69	2.58	0.10	0.17	3.27	3.44	0.16	0.87	1.03	—	10,259	10,259	0.16	1.54	27.2	10,748
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	1.44	1.32	0.68	14.2	0.03	0.01	3.13	3.15	0.01	0.79	0.80	—	3,177	3,177	0.11	0.08	9.43	3,212
Total	1.98	1.63	13.4	17.9	0.16	0.23	7.57	7.80	0.22	1.98	2.20	—	16,598	16,598	0.32	2.06	47.5	17,266
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.06	0.03	1.73	0.42	0.02	0.03	0.55	0.58	0.03	0.15	0.18	—	1,787	1,787	0.03	0.27	0.12	1,868
Refrigerated Warehouse-No Rail	0.09	0.06	1.42	0.67	0.01	0.02	0.61	0.64	0.02	0.16	0.19	—	1,376	1,376	0.02	0.18	0.16	1,429
Unrefrigerated Warehouse-No Rail	0.39	0.21	10.1	2.59	0.10	0.17	3.27	3.44	0.16	0.87	1.03	—	10,261	10,261	0.16	1.54	0.71	10,724
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

User Defined Industrial	1.38	1.26	0.76	11.8	0.03	0.01	3.13	3.15	0.01	0.79	0.80	—	2,936	2,936	0.11	0.08	0.24	2,963
Total	1.92	1.57	14.0	15.4	0.15	0.23	7.57	7.80	0.22	1.98	2.20	—	16,359	16,359	0.32	2.06	1.23	16,983
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.01	< 0.005	0.25	0.06	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	233	233	< 0.005	0.04	0.26	244
Refrigerated Warehouse-No Rail	0.01	0.01	0.19	0.09	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	167	167	< 0.005	0.02	0.33	173
Unrefrigerated Warehouse-No Rail	0.05	0.03	1.36	0.34	0.01	0.02	0.43	0.46	0.02	0.12	0.14	—	1,243	1,243	0.02	0.19	1.42	1,300
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.19	0.17	0.11	1.67	< 0.005	< 0.005	0.43	0.43	< 0.005	0.11	0.11	—	369	369	0.01	0.01	0.51	373
Total	0.26	0.21	1.91	2.17	0.02	0.03	1.02	1.05	0.03	0.27	0.30	—	2,011	2,011	0.04	0.25	2.51	2,090

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	300	300	0.03	< 0.005	—	302
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	686	686	0.07	0.01	—	690
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	673	673	0.06	0.01	—	677
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	34.0	34.0	< 0.005	< 0.005	—	34.2
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,693	1,693	0.16	0.02	—	1,703
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	300	300	0.03	< 0.005	—	302
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	686	686	0.07	0.01	—	690

Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	673	673	0.06	0.01	—	677
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	34.0	34.0	< 0.005	< 0.005	—	34.2
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,693	1,693	0.16	0.02	—	1,703
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufac turing	—	—	—	—	—	—	—	—	—	—	—	—	49.7	49.7	< 0.005	< 0.005	—	50.0
Refriger ated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	114	114	0.01	< 0.005	—	114
Unrefrig erated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	111	111	0.01	< 0.005	—	112
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	5.63	5.63	< 0.005	< 0.005	—	5.67
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	280	280	0.03	< 0.005	—	282

## 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	455	455	0.04	< 0.005	—	456
Refrigerated Warehouse-No Rail	0.03	0.01	0.23	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	280	280	0.02	< 0.005	—	281
Unrefrigerated Warehouse-No Rail	0.09	0.04	0.79	0.66	< 0.005	0.06	—	0.06	0.06	—	0.06	—	944	944	0.08	< 0.005	—	947
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	1,679	1,679	0.15	< 0.005	—	1,684
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	455	455	0.04	< 0.005	—	456

Refrigerated Warehouse-No	0.03	0.01	0.23	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	280	280	0.02	< 0.005	—	281
Unrefrigerated Warehouse-No Rail	0.09	0.04	0.79	0.66	< 0.005	0.06	—	0.06	0.06	—	0.06	—	944	944	0.08	< 0.005	—	947
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.15	0.08	1.41	1.18	0.01	0.11	—	0.11	0.11	—	0.11	—	1,679	1,679	0.15	< 0.005	—	1,684
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	75.3	75.3	0.01	< 0.005	—	75.6
Refrigerated Warehouse-No Rail	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	46.4	46.4	< 0.005	< 0.005	—	46.5
Unrefrigerated Warehouse-No Rail	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	156	156	0.01	< 0.005	—	157
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	278	278	0.02	< 0.005	—	279

## 4.3. Area Emissions by Source

### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.73	4.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.71	1.57	0.08	9.59	< 0.005	0.02	—	0.02	0.01	—	0.01	—	39.4	39.4	< 0.005	< 0.005	—	39.6
Total	7.01	6.88	0.08	9.59	< 0.005	0.02	—	0.02	0.01	—	0.01	—	39.4	39.4	< 0.005	< 0.005	—	39.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	4.73	4.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.31	5.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.86	0.86	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.21	0.20	0.01	1.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.47	4.47	< 0.005	< 0.005	—	4.49
Total	1.18	1.17	0.01	1.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.47	4.47	< 0.005	< 0.005	—	4.49

## 4.4. Water Emissions by Land Use

### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	14.6	49.4	64.0	1.51	0.04	—	112
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	14.6	49.4	64.0	1.51	0.04	—	112

Unrefrig Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	68.4	230	299	7.03	0.17	—	525
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	97.7	329	427	10.0	0.24	—	750
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	14.6	49.4	64.0	1.51	0.04	—	112
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	14.6	49.4	64.0	1.51	0.04	—	112
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	68.4	230	299	7.03	0.17	—	525
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	97.7	329	427	10.0	0.24	—	750
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Manufac	—	—	—	—	—	—	—	—	—	—	—	2.43	8.17	10.6	0.25	0.01	—	18.6
Refrigerated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.43	8.17	10.6	0.25	0.01	—	18.6
Unrefrigerated Wareho use-No Rail	—	—	—	—	—	—	—	—	—	—	—	11.3	38.1	49.5	1.16	0.03	—	86.9
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	16.2	54.5	70.6	1.66	0.04	—	124

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufac turing	—	—	—	—	—	—	—	—	—	—	—	22.1	0.00	22.1	2.21	0.00	—	77.3

Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	16.7	0.00	16.7	1.67	0.00	—	58.6
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	78.2	0.00	78.2	7.81	0.00	—	273
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	22.1	0.00	22.1	2.21	0.00	—	77.3
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	16.7	0.00	16.7	1.67	0.00	—	58.6
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	78.2	0.00	78.2	7.81	0.00	—	273
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	409
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	3.66	0.00	3.66	0.37	0.00	—	12.8
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.77	0.00	2.77	0.28	0.00	—	9.70
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.9	0.00	12.9	1.29	0.00	—	45.3
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	19.4	0.00	19.4	1.94	0.00	—	67.8

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	33.7	33.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	36.8	36.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	33.7	33.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	36.8	36.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.58	5.58
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.09	6.09

## 4.7. Offroad Emissions By Equipment Type

### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 4.8. Stationary Emissions By Equipment Type

### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 4.9. User Defined Emissions By Equipment Type

### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 4.10. Soil Carbon Accumulation By Vegetation Type

### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetati on	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	8/3/2026	8/14/2026	5.00	10.0	—

Grading	Grading	8/17/2026	9/11/2026	5.00	20.0	—
Building Construction	Building Construction	9/14/2026	7/30/2027	5.00	230	—
Paving	Paving	7/5/2027	7/30/2027	5.00	20.0	—
Architectural Coating	Architectural Coating	6/5/2027	7/30/2027	5.00	40.0	—

## 5.2. Off-Road Equipment

### 5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Crawler Tractors	Diesel	Average	4.00	8.00	87.0	0.43
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Crawler Tractors	Diesel	Average	3.00	8.00	87.0	0.43
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Crawler Tractors	Diesel	Average	3.00	8.00	87.0	0.43
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	1.00	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	3.00	10.2	HHDT,MHDT
Grading	Hauling	93.8	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	92.6	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	32.0	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	18.5	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	330,585	110,195	12,859

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	100	0.00	—
Grading	15,000	—	200	0.00	—
Paving	0.00	0.00	0.00	0.00	4.92

### 5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%

## 5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Manufacturing	0.00	0%
Refrigerated Warehouse-No Rail	0.00	0%
Unrefrigerated Warehouse-No Rail	0.00	0%
Other Asphalt Surfaces	3.98	100%
Parking Lot	0.94	100%
User Defined Industrial	0.00	0%

## 5.8. Construction Electricity Consumption and Emissions Factors

### kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	346	0.03	< 0.005
2027	0.00	346	0.03	< 0.005

## 5.9. Operational Mobile Sources

### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Manufacturing	16.0	4.99	3.31	4,604	640	200	132	184,175
Refrigerated Warehouse-No Rail	18.0	1.52	0.60	4,799	719	60.8	23.8	191,967
Unrefrigerated Warehouse-No Rail	94.0	8.18	3.24	25,089	3,758	327	130	1,003,579
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	370	58.4	33.1	101,242	4,499	710	402	1,230,996

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
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0	0.00	330,585	110,195	12,859
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### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

#### Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Manufacturing	316,353	346	0.0330	0.0040	1,419,938
Refrigerated Warehouse-No Rail	723,007	346	0.0330	0.0040	874,802
Unrefrigerated Warehouse-No Rail	710,005	346	0.0330	0.0040	2,945,351
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00
Parking Lot	35,869	346	0.0330	0.0040	0.00
User Defined Industrial	0.00	346	0.0330	0.0040	0.00

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Manufacturing	7,645,125	0.00
Refrigerated Warehouse-No Rail	7,645,125	0.00
Unrefrigerated Warehouse-No Rail	35,674,938	0.00
Other Asphalt Surfaces	0.00	0.00

Parking Lot	0.00	0.00
User Defined Industrial	0.00	0.00

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Manufacturing	41.0	—
Refrigerated Warehouse-No Rail	31.1	—
Unrefrigerated Warehouse-No Rail	145	—
Other Asphalt Surfaces	0.00	—
Parking Lot	0.00	—
User Defined Industrial	0.00	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Manufacturing	Other commercial A/C and heat pumps	User Defined	750	0.30	4.00	4.00	18.0
Refrigerated Warehouse-No Rail	Cold storage	User Defined	150	7.50	7.50	7.50	25.0

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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## 5.17. User Defined

Equipment Type	Fuel Type
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## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	26.9	annual days of extreme heat
Extreme Precipitation	2.90	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	18.5	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about  $\frac{3}{4}$  an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

### 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

### 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

### 6.4. Climate Risk Reduction Measures

## 7. Health and Equity Details

### 7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	98.7

AQ-PM	60.6
AQ-DPM	86.2
Drinking Water	10.2
Lead Risk Housing	49.5
Pesticides	0.00
Toxic Releases	59.1
Traffic	60.2
Effect Indicators	—
CleanUp Sites	58.2
Groundwater	0.00
Haz Waste Facilities/Generators	53.5
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	55.7
Cardio-vascular	70.2
Low Birth Weights	37.2
Socioeconomic Factor Indicators	—
Education	78.6
Housing	83.9
Linguistic	60.6
Poverty	80.8
Unemployment	82.7

## 7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—

Above Poverty	8.892595919
Employed	15.11612986
Median HI	22.04542538
Education	—
Bachelor's or higher	6.659822918
High school enrollment	100
Preschool enrollment	49.55729501
Transportation	—
Auto Access	49.51879892
Active commuting	57.6799692
Social	—
2-parent households	16.66880534
Voting	4.683690491
Neighborhood	—
Alcohol availability	31.19466188
Park access	16.48915694
Retail density	26.22866675
Supermarket access	94.25125112
Tree canopy	3.58013602
Housing	—
Homeownership	45.34838958
Housing habitability	19.74849224
Low-inc homeowner severe housing cost burden	5.3124599
Low-inc renter severe housing cost burden	20.28743744
Uncrowded housing	20.37726165
Health Outcomes	—
Insured adults	11.15103298
Arthritis	27.4

Asthma ER Admissions	31.4
High Blood Pressure	18.2
Cancer (excluding skin)	66.1
Asthma	9.8
Coronary Heart Disease	37.1
Chronic Obstructive Pulmonary Disease	15.6
Diagnosed Diabetes	22.3
Life Expectancy at Birth	4.6
Cognitively Disabled	38.1
Physically Disabled	20.3
Heart Attack ER Admissions	27.8
Mental Health Not Good	13.8
Chronic Kidney Disease	27.1
Obesity	7.1
Pedestrian Injuries	75.9
Physical Health Not Good	17.0
Stroke	19.7
Health Risk Behaviors	—
Binge Drinking	65.1
Current Smoker	9.9
No Leisure Time for Physical Activity	13.9
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	6.8
Elderly	52.4
English Speaking	24.1
Foreign-born	57.7

Outdoor Workers	10.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	70.2
Traffic Density	78.7
Traffic Access	67.4
Other Indices	—
Hardship	89.7
Other Decision Support	—
2016 Voting	8.9

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	69.0
Healthy Places Index Score for Project Location (b)	11.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

### 7.4. Health & Equity Measures

No Health & Equity Measures selected.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

### 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

## 8. User Changes to Default Data

Screen	Justification
Land Use	Total Project area is 9.98 acres
Construction: Construction Phases	Construction schedule based on provided information
Construction: Off-Road Equipment	Crawler Tractors used in lieu of Tractors/Loaders/Backhoes Hours are based on an 8-hour workday
Construction: Dust From Material Movement	This analysis conservatively assumes that the entire Project site (approximately 10 acres) can be disturbed per day
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on the CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, & MCY). Truck Mix based on information in the Traffic analysis
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively. Beginning 1 January 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater.



## ATTACHMENT 3

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## OWNER'S CERTIFICATION

This Project-Specific Water Quality Management Plan (WQMP) has been prepared for **Ledo Capital Group** by **SB&O Inc.** for the **Heacock Industrial** project.

This WQMP is intended to comply with the requirements of **City of Moreno Valley** per **Ordinance No. 827** which includes the requirement for the preparation and implementation of a Project-Specific WQMP. The undersigned, while owning the property/project described in the preceding paragraph, shall be responsible for the implementation and funding of this WQMP and will ensure that this WQMP is amended as appropriate to reflect up-to-date conditions on the site. In addition, the property owner accepts responsibility for interim operation and maintenance of Stormwater BMPs until such time as this responsibility is formally transferred to a subsequent owner. This WQMP will be reviewed with the facility operator, facility supervisors, employees, tenants, maintenance and service contractors, or any other party (or parties) having responsibility for implementing portions of this WQMP. At least one copy of this WQMP will be maintained at the project site or project office in perpetuity. The undersigned is authorized to certify and to approve implementation of this WQMP. The undersigned is aware that implementation of this WQMP is enforceable under City of Moreno Valley Water Quality Ordinance (Municipal Code Section **8.10**).

"I, the undersigned, certify under penalty of law that the provisions of this WQMP have been reviewed and accepted and that the WQMP will be transferred to future successors in interest."

Owner's Signature

Owner's Printed Name

Date

Owner's Title/Position

## PREPARER'S CERTIFICATION

"The selection, sizing and design of stormwater treatment and other stormwater quality and quantity control measures in this plan meet the requirements of Regional Water Quality Control Board Order No. **R8-2010-0033** and any subsequent amendments thereto."

Bradley C Knepp  
Project Engineer

~~8/6/2020~~

Preparer's Licensure: **C75281**



# All-purpose Acknowledgment California

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

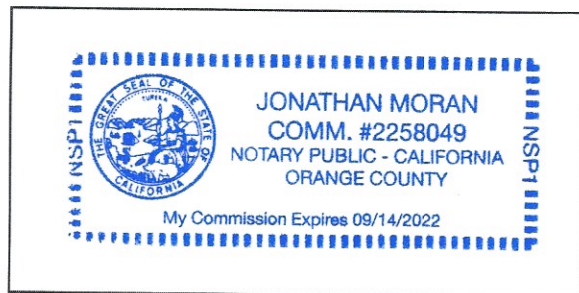
County of Orange

On September 5, 2020 before me, Jonathan Moran, Notary Public (here insert name and title of the officer),

personally appeared J. Ryan Martin

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.



Notary Seal

WITNESS my hand  
and official seal.

Signature

Jonathan Moran

## For Bank Purposes Only

Description of Attached Document

Type or Title of Document Owner's Certification

Document Date September 5, 2020

Number of Pages 1

Signer(s) Other Than Named Above \_\_\_\_\_

Account Number (if applicable) \_\_\_\_\_



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