



THE WORLD
LOGISTICS
CENTER TM ®

FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT

Volume 3 - Final Environmental Impact Report



State Clearinghouse No. 2012021045

City of Moreno Valley
Riverside County, California

May 2015

LSA

**FINAL PROGRAMMATIC
ENVIRONMENTAL IMPACT REPORT
VOLUME 3**

**REVISED DRAFT ENVIRONMENTAL IMPACT
REPORT (CLEAN)
STATE CLEARINGHOUSE NO. 2012021045**

**WORLD LOGISTICS CENTER PROJECT
CITY OF MORENO VALLEY
RIVERSIDE COUNTY, CALIFORNIA**

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**WORLD LOGISTICS CENTER PROJECT
CITY OF MORENO VALLEY
RIVERSIDE COUNTY, CALIFORNIA**

General Plan Amendment
Specific Plan
Zone Change
Tentative Parcel Map
Development Agreement
Annexation

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1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The Draft Environmental Impact Report (EIR) for the World Logistics Center Project (proposed project) has been prepared to inform the decision-makers and the public of the environmental effects associated with implementation of the proposed project.

The Draft EIR (DEIR) was circulated for public review and comment on February 4, 2013. The comment period on the DEIR closed on April 8, 2013, however the City has continued to receive and accept letters and comments for an additional year through April 2014. The comments and written responses are contained in Volume 1 of this document.

This EIR is a program EIR. A program EIR is an EIR that may be prepared on a series of actions that can be characterized as one large project, and are related either:

- Geographically,
- As logical parts in the chain of contemplated actions,
- In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- As individual activities carried out under the same authorizing statutory or regulatory authority, and having generally similar environmental effects which can be mitigated in similar ways.

The use of a program EIR can provide the following advantages. The program EIR can:

- Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,
- Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,
- Avoid duplicative reconsideration of basic policy considerations,
- Allow the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts.

The project is considered regionally significant according to criteria set forth in CEQA Guidelines Section 15206(b). The EIR was prepared in accordance with the California Environmental Quality Act¹ (CEQA) and Sections 15120 through 15131 and 15161 of the *Guidelines for California Environmental Quality Act*,² which regulate the preparation of EIRs. The DEIR (State of California Clearinghouse No. 2012021045) has been prepared by LSA Associates, Inc. on behalf of the City of Moreno Valley (City) to: 1) identify the proposed project's impacts on the environment; 2) to discuss alternatives to the proposed project; and 3) to propose mitigation measures that will offset, minimize or otherwise avoid significant environmental impacts. Based on the potential impacts of the proposed project, including cumulative impacts, the City determined that an EIR should be prepared to analyze potential impacts of the proposed project with respect to the following environmental issues. The

¹ *California Environmental Quality Act*, as of January 1, 2014, §§21000–21189.3, Public Resources Code, State of California.

² *Guidelines for California Environmental Quality Act*, as of January 1, 2014, §§15000–15387, California Code of Regulations, Title 14, Chapter 3, State of California.

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referenced environmental issues below are individually addressed in the *Environmental Analysis* Section 4.0, of this report:

- Aesthetics;
- Agricultural and Forest Resources;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Greenhouse Gas Emissions and Global Climate Change;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population, Housing, and Employment;
- Public Services including Recreation;
- Traffic and Circulation; and
- Utilities and Service Systems.

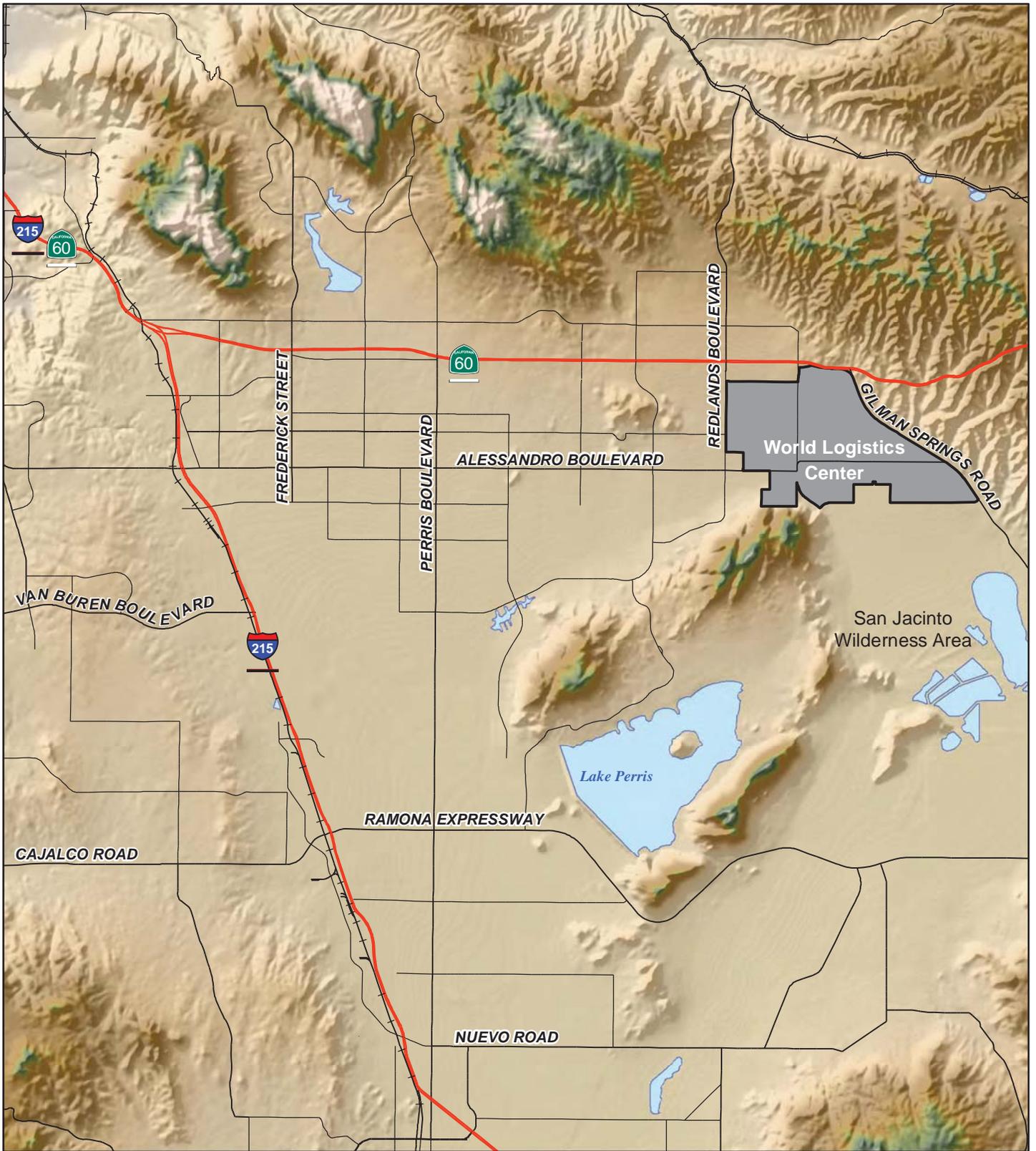
1.2 PROJECT LOCATION AND SETTING

1.2.1 Project Site

The Project site is located in Rancho Belago, the eastern portion of the City of Moreno Valley, in northwestern Riverside County. As shown in Figure 1.1, the project site is immediately south of State Route 60 (SR-60), between Redlands Boulevard and Gilman Springs Road (the easterly city limit), extending to the southerly city limit. The major roads that currently provide access to the project site are Theodore Street, Redlands Boulevard, Alessandro Boulevard, and Gilman Springs Road. The project site slopes gently (approximately 2%) from north to south, with elevations ranging from approximately 1,760 feet above mean sea level (amsl) at the northeast corner to 1,480 feet amsl at the southeast corner.

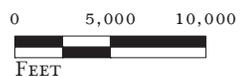
1.2.2 City of Moreno Valley

Moreno Valley is Riverside County's second largest city with a population of nearly 200,000 people encompassing more than 46 square miles. Over the years, Moreno Valley has remained overwhelmingly residential in character with only 9 percent of its land allocated for job-producing land uses. Today, Moreno Valley has one of the lowest jobs-to-housing ratios in the region (0.47), representing about one-third of the rate of its neighboring City of Riverside (1.41). As a result of limited job opportunities in the City, a large number of Moreno Valley's residents commute great distances to jobs outside the City, with an average daily commute of 76 minutes. Long commutes result in more time in traffic, more time breathing polluted air, more stress, less time at home, and less time with families.



LSA

FIGURE 1.1



SOURCE: USGS DEM; Thomas Bros, 2009

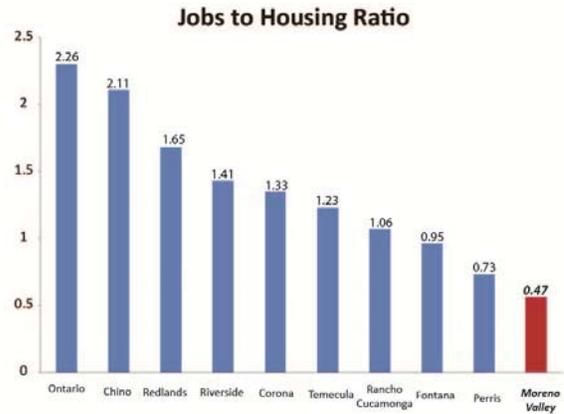
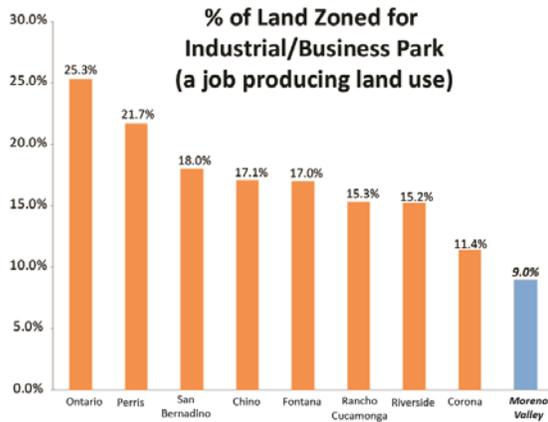
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Regional Location

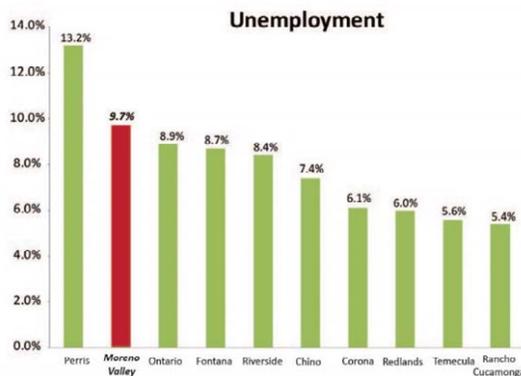
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Under current municipal financial conditions, residential development does not “pay its way” in that property taxes and other revenues generated by residences do not cover the costs of municipal services for those residences. During times of rapid residential development, the City relied mainly on residential development fees to support its operations. In the early 1990s, when residential development slowed, revenues from development fees declined dramatically. This decline was exacerbated by reduced assessed valuations and property taxes, and Sacramento’s decision to take a greater share of property tax revenues from cities. These factors resulted in the City becoming financially overextended. To provide the funds necessary for the City to continue to meet its obligations, a temporary Utility Users Tax was enacted by the voters in 1991. With no significant improvement to its financial condition, this tax was made permanent in 1996. The City has become dependent on this tax which now represents approximately \$16 million or 20 percent of the City’s budgeted revenue. The City does not currently have a sufficient tax base to fully fund its operations and provide the levels of service expected by its citizens. This has been a recurring challenge in the City for more than 20 years.

According to the U.S. Census Bureau, the per capita income in Moreno Valley is nearly 40 percent below the State of California average. Nearly 20 percent of the population in Moreno Valley is living below the national poverty level. Moreno Valley has one of the highest high-school drop-out rates in the County with over 50 percent of its adult residents having a high school education or less. Only 15 percent of the residents have a Bachelor’s Degree or higher. The majority of the population, 77 percent, does not have a college degree. Unemployment in Moreno Valley remains among the highest in the region at 9.7 percent and median house prices are among the lowest in the Inland Empire.



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To address these conditions, in 2010 the City of Moreno Valley developed an Economic Development Strategy focused on creating job opportunities in the City, which are responsive to the education and skill level of its residents. The logistics and healthcare industries were identified as the two primary areas of opportunity. In April 2011, the City held public hearings on its proposed Economic Development Action Plan which was then adopted by the Moreno Valley City Council on April 26, 2011. The Action Plan focused on five geographic areas within the City and established key initiatives for each. The eastern portion of the City was identified in the Action Plan as being a prime area for logistics development. “Logistics” facilities are warehouses which store, assemble and process manufactured goods and materials prior to their distribution. They also include the facilities to deal with the trucks which deliver goods to, and take goods from, the warehouses. In April 2012 an application was filed for the development of the World Logistics Center which was developed consistent with the City’s Economic Development Action Plan. . A Notice of Preparation of the EIR was filed in February 2012 for The World Logistics Center project. In 2013, the City adopted a 3-year Economic Development Action Plan based upon the adopted 2011 Economic Development Strategy. See DEIR Section 3.6.1 for 2011 and 2013 Economic Development Action Plan Objectives related to the WLC.

According to the Inland Empire Economic Partnership January 2014 Quarterly Economic Report, “Logistics has been the fastest growing sector in the Inland Empire’s economic base.” The logistics industry offers an opportunity for upward mobility for workers providing access to skill ladders leading to the middle class and the number one contributor to job growth and upward mobility in the Inland Empire region.

1.3 EXISTING SITE DESCRIPTION

The project site is largely vacant agricultural land, with seven occupied single-family homes and associated ranch/farm buildings in various locations on the property. In the 1920s, several farm buildings and related houses were constructed on the property and, in the 1940s, a stock farm operated on a portion of the site that was later expanded into a commercial horse farm and training facility that operated until the mid-1990s. The overall project site has been farmed by a variety of owners since the early 1900s and has supported dry (non-irrigated) farming, livestock grazing, and limited citrus groves. Much of the site continues to be used for dry farming today.

San Diego Gas & Electric (SDG&E) operates a natural gas compressor plant, known as the Moreno Compressor Station, on 19 acres in the south-central portion of the site. The Southern California Gas Company (SCGC) operates a metering and pipe cleaning station on two separate parcels (totaling 1.5 acres) in the south-central portion of the site south of Alessandro Boulevard along existing Virginia Street. The site contains a variety of overhead and underground utility lines associated with oil, natural gas, and electrical service. At present, the project site contains a number of unimproved drainage features, but it does not contain any improved flood control facilities.

1.4 PROJECT DESCRIPTION

The proposed project is a master planned business park designed to support the logistics operations of large global companies that will be implemented through the adoption of the World Logistics Center Specific Plan. Although it is called a Specific Plan, it is not intended to depict individual building projects, but rather to, provide a guide for the development of infrastructure and building projects within the project area. The Specific Plan will establish the zoning for the project site and include a land use plan, designation of planning areas, design and landscaping guidelines, and development standards for the development. As shown in Figure 3.8 – *Specific Plan Land Use* and reflected in Table 1.A, *Land Use Summary* below, the World Logistics Center Specific Plan will consist of the following land uses:

- **Logistics Development (LD):** Approximately 2,382.8 acres of the Specific Plan Area are planned for development of logistics-oriented land uses to provide high-cube logistics warehouse uses consisting of buildings of 500,000 square feet or greater. Warehousing and logistics activities consistent with the storage and processing of manufactured goods and materials prior to their distribution to other facilities are permitted within this category along with facilities for the outdoor storage of trucks, trailers and shipping containers. Ancillary office, employee services and property management facilities are permitted in connection with primary uses. A permitted use within the LD category will include “logistics support” to provide fueling facilities and limited service commercial uses in support of the World Logistics Center.
- **Light Logistics (LL):** Approximately 37.1 acres of the project site are planned for development of Light Logistics land uses to provide warehouse uses less than 500,000 square feet in size, including self-storage and vehicle storage uses.
- **Open Space (OS):** Approximately 74.3 acres of the project site are planned for permanent open space to preserve the southwestern portion of the site, which is a portion of Mt. Russell.

Table 1.A: WLCSP Land Use Summary

Area/Land Use	Acres	Building Square Footage
Logistics Development (LD)	2,382.8	40,400,000
Light Logistics (LL)	37.1	200,000
Open Space (OS)	74.3	—
Right-Of-Way (ROW) ¹	115.8	—
TOTAL	2,610.0	40,600,000
Floor Area Ratio (FAR)²		0.357

¹ Right-of-Way included in each land use category

² Gross building area (sf) divided by gross site area (sf)

1.5 ACTIONS COVERED BY THE EIR

The proposed project covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use), Circulation, Parks, Recreation, and proposed Open Space, Safety, Conservation, and the General Plan Goals and Objectives

A new Specific Plan will be adopted to govern development of the 2,610-acre World Logistics Center. A separate zoning amendment is also proposed to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City’s Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering a 1,539-acre portion of the site which has not yet been subdivided of the total 2,610-acres. This subdivision map is for financing purposes only creating new legal parcels but will not confer any development rights to said parcels.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project.

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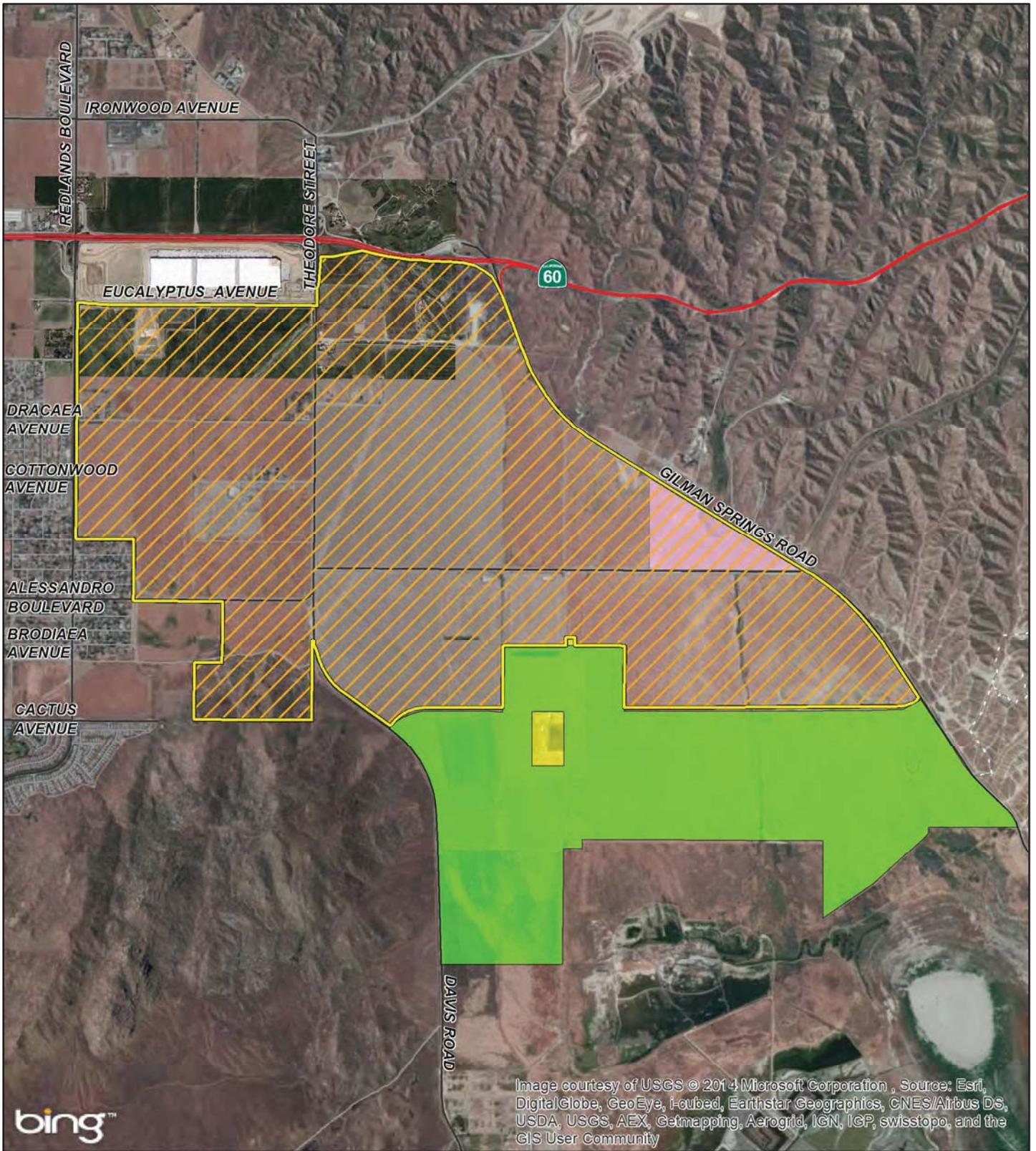
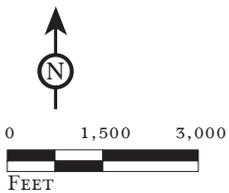


Image courtesy of USGS © 2014 Microsoft Corporation, Source: Esri, DigitalGlobe, GeoEye, I-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

FIGURE 1,2

LSA



-  Project Boundary
-  Specific Plan
-  CDFW Land - Open Space
-  Public Utility
-  Annexation Area

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Component Areas

SOURCE: ESRI World Imagery, 2010; Bing Maps, 2010; Google Maps, 2011.

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Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*. The environmental impacts of all of these entitlements on the entire project area are addressed in this EIR and the accompanying technical reports and analyses.

1.6 SUMMARY OF ENVIRONMENTAL ISSUES

The following presents a short summary of the analysis conducted as part of this environmental assessment. It is intended to give the reader an easy to read summary of the analytical approach and results. It is not intended to be a comprehensive listing of project impacts or mitigation measures. For complete accounting of any analysis, please refer to the appropriate section of Chapter 4 of this EIR.

1.6.1 Aesthetics

The EIR evaluated potential impacts to Aesthetics (Section 4.1). Potential impacts to Scenic Vistas, Scenic Resources and Scenic Highways, Existing Visual Character and Surroundings, and Cumulative Aesthetics Impacts were analyzed and found that the proposed project has the potential to result in substantial adverse effects in these areas even after all feasible mitigation is applied. For the purposes of the analysis, the current undeveloped state of the property is analyzed in comparison to the project built out condition. It is important to note that the project area is currently covered by the Moreno Highlands Specific Plan which, if realized, would have transformed the site into an urbanized environment. The EIR found that the project's impact to light and glare could be mitigated to less than significant. Mitigation measures to address aesthetics impacts include a 250-foot setback from residential property lines, landscaping, berms and or fencing to screen and landscaped views of the project from existing residents, the dedication of 74.3 acres of open space, restriction on building heights to preserve views of Mt. Russell from SR-60, and restrictions on lighting and solar panels to protect existing resident from excess light and glare. Mitigation measures for each of these areas are listed in Table 1.B.

The Specific Plan contains extensive design guidelines to ensure a uniform architectural theme throughout the project. Similarly, landscape design standards are established project-wide. A process for the discretionary review of each proposed building is included in the Specific Plan which requires staff to evaluate all aesthetic aspects of each proposed building prior to its approval by the City.

1.6.2 Agriculture and Forestry Resources

The EIR evaluated potential impacts to Agricultural and Forestry Resources (Section 4.2) and found that impact to forest land zoning, loss or conversion of forest land, and existing zoning for agricultural use or a Williamson Act contract were less than significant and do not require mitigation. Mitigation is required for the loss of 25 acres of land designated as "Unique Farmland" through the provision of a conservation easement over comparably productive land.

The EIR contains an analysis of the state of the agriculture industry in the Inland Empire in Appendix C which concluded that the agriculture industry will continue to decline in the Inland Empire for three main reasons: 1) the more affordable housing market in the region compared to Los Angeles and Orange Counties, 2) the competition for cheaper farm labor from areas like the South Central Valley, and 3) lower water allocations to agriculture because of the growing urban population that receives priority for the water. The combination of the small size of the Inland Empire's agricultural industry and the three key economic constraints caused the EIR to conclude that the agriculture industry in the Inland Empire is in decline and that the agriculture industry within the Inland Empire will become less competitive and continue to decline regardless of whether or not this project is developed.

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An additional study found in EIR Appendix C, was prepared focusing specifically on the World Logistics Center property by Cushman & Wakefield in 2013 which concluded the project impact was not considered significant based on the results of the LESA Model.

1.6.3 Air Quality

An air quality and health effects assessment examined emissions from construction and operation of the World Logistics Center from both mobile and stationary sources. Broadly, the analysis of project-related emissions examined the (1) total amount of emissions generated, (2) the resulting concentrations of criteria (regulated) pollutants in the vicinity of the project area, and (3) the health effects of project-related emissions over a sub-regional area. A detailed discussion of the methodology approach can be found in Section 4.3.3 of the EIR.

1.6.3.1 Emissions

The total daily emissions from the project were analyzed in the air quality assessment. The analysis considered emissions of volatile organic compounds (VOCs), oxides of nitrogen (NO_x), carbon monoxide (CO), particulate matter (PM₁₀ and PM_{2.5}), and oxides of sulfur (SO_x). Emissions from construction and operation of the proposed project were compared to South Coast Air Quality Management District's (SCAQMD) significance threshold separately and combined for those years that construction and operation overlap. For all pollutants, with the exception of SO_x and PM_{2.5} the daily emissions exceeded SCAQMD's significance thresholds after mitigation.

1.6.3.2 Localized Concentrations of Criteria (Regulated) Pollutants

Consistent with SCAQMD guidelines, localized concentrations of certain criteria pollutants in the vicinity of the project were also analyzed. The analysis considered the project's impacts on ambient concentrations of CO, NO_x, PM₁₀, and PM_{2.5}. The analysis considered multiple scenarios, including conservative assumptions that all work would have been completed in 2012 and in multiple years when construction and operation overlap. After mitigation, the project would exceed the localized significance thresholds at the existing residences located within the project boundaries for PM₁₀ in five different analysis scenarios that are described in detail in Section 4.3.6.3. but would not affect any residences outside the project boundary. Therefore, the project's localized impacts would not exceed any significance thresholds for receptors located outside of the project boundaries.

1.6.3.3 Health Effects

CEQA requires public disclosure of reasonably foreseeable health related impacts. Section 4.3.6 of the EIR evaluated the Project for both the cancer and non-cancer impacts. No significant impacts were found for either

The assessment of health impacts is a continuing evolution of science and regulation. Since December 2014, three major scientific and regulatory activities have come forward that will affect how such assessments are performed and what such impacts mean to society as described below.

- On December 30, 2014, the ARB released its update to the Emissions Factor Model, EMFAC2014, which is used to estimate emissions from motor vehicles in California. The EMFAC2014 model represents the ARB's current understanding of motor vehicle technologies and regulatory implementation of rules aimed at reducing air emissions from motor vehicles. Of significance in this regard are the new projections of air emissions from heavy duty diesel engines. Based on the results of the EMFAC2014 model, emissions of diesel particulate

matter range from 50 to 80 percent lower than previously estimated using the previous version of the EMFAC model, EMFAC2011. Since heavy duty trucks constitute nearly all of the project's diesel PM emissions, the incorporation of the emission information from the EMFAC2014 model is important in estimating the amount of diesel PM and in assessing the project's health risk impacts resulting from these emissions

- On January 27, 2015, the Health Effects Institute (HEI), an independent organization funded by the U.S. Environmental Protection Agency and industry, released the result of a comprehensive multiyear (5 ½ years) peer-reviewed scientific study titled *Effects of Lifetime Exposure to Inhaled New-Technology Diesel Exhaust in Rats*. The importance of this study is the finding that diesel PM emissions from new technology diesel engines (2007 or newer-compliant engine) do not cause any increase in the risk of lung cancer or other significant adverse health effects in study animals that, in fact, are more sensitive to particle exposure than humans.

This is the first study to conduct a comprehensive evaluation of lifetime inhalation exposure to emissions from heavy-duty 2007-compliant engines (referred to as “new technology diesel exhaust,” or NTDE). The study evaluated the long-term effects of multiple concentrations of inhaled NTDE, which has greatly reduced particle emissions compared with “traditional-technology diesel exhaust” (TDE) in male and female rats on more than 100 different biologic endpoints, including tumor development, and compared the results with biologic effects seen in earlier studies in rats after exposure to TDE. The study found that NTDE does not induce tumors or pre-cancerous changes in the lung and does not increase tumors that were considered to be related to NTDE.

Previous studies directed at studying the effects of diesel PM on health were based on exposure studies that date 15 to 20 years ago when diesel emissions were significantly higher than the NTDE. The HEI study of lifetime inhalation exposure of rats exposed to one of three concentration levels of NTDE from a 2007-compliant engine, for 16 hours per day, 5 days a week, used a strenuous operating cycle that more accurately reflected the real-world operation of a modern engine than cycles used in previous studies. It is also important to highlight that the U.S. Environmental Protection Agency (EPA), the California Air Resources Board, the U.S. Department of Energy (DOE) and the U.S. Federal Highway Administration are sponsors and/or reviewers of this study in conjunction with the manufacturers of emissions control equipment.

- On March 6, 2015, the California Office of Environmental Health Hazards Assessment (OEHHA) adopted a new guidance for estimating health risks from toxic air contaminants that incorporated the importance of early-in-life sensitivities of young children to exposures to toxics air contaminants and recommends a lifetime exposure duration of 30-years. Within the context of this assessment, this new assessment guidance is referred to as the “Current OEHHA Guidance”. The new guidance updates earlier guidance recommended by OEHHA and SCAQMD referred to in this assessment as the “Former OEHHA Guidance”, which was used in the DEIR. The “Former OEHHA Guidance” was based on a lifetime exposure of 70 years and does not incorporate early-in-life age sensitivity factors. The importance of the “Current OEHHA Guidance” is that the guidance produces much more conservative estimates of cancer risks from toxic air contaminant exposures.

It should be kept in mind that the mitigation measures which mandated that all diesel trucks accessing the project be compliant with the 2010 standards and which mandate that all off-road equipment be Tier 4, which results in emissions equivalent to 2010 compliant diesel trucks, means that there will be no adverse health related impacts. Nevertheless, because the DEIR included an analysis of the health related impacts resulting from exposure to diesel exhaust using the “Former OEHHA Guidance,” the FEIR includes a similar analysis to allow the reader to understand how the

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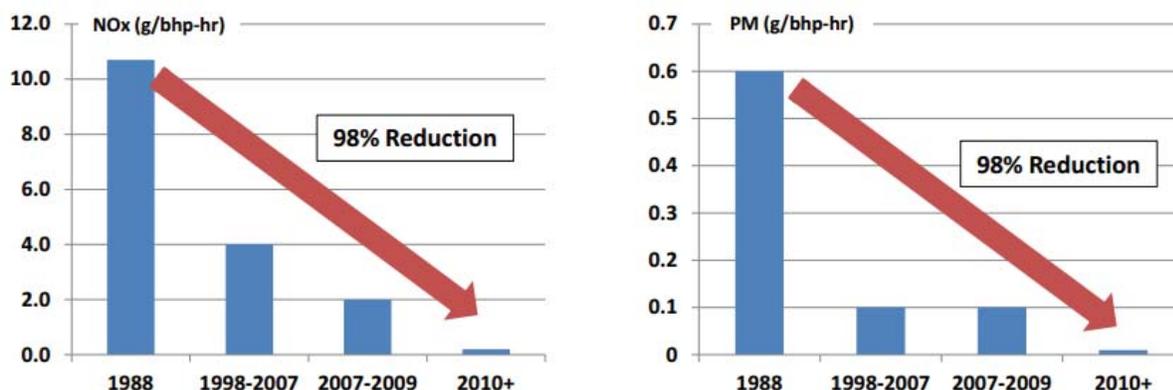
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application of the “Current OEHHA Guidance” compares to that which resulted from the “Former OEHHA Guidance,” i.e. what the impacts would be if the results of the Health Effects Institute study were disregarded.

1.6.3.4 Mitigation

The project would incorporate a number of mitigation measures to reduce the project’s impacts on air quality. Those mitigation measures are detailed in Table 1.B in the Executive Summary and throughout Section 4.3 in this EIR. Among the many mitigation measures (MM) is MM 4.3.6.3B, which requires that all trucks using the World Logistics Center meet U.S. EPA 2010 emissions standards, the most stringent heavy-duty truck emissions standards ever imposed by the U.S. or California. The trucks that would serve the proposed project would be 90 percent cleaner than the typical truck on the road today.

U.S. Emission Standards – Heavy Duty Trucks



In addition to requiring clean trucks, the project would require low emission construction equipment, limit vehicle idling to three minutes or less, prohibit trucks from going through residential areas, require that all on-site equipment will be powered by non-diesel fuels, provide electrical hook-ups for the future use of electric vehicles, and require the development of an alternative fuel station to encourage the use of non-diesel vehicles at the World Logistics Center.

1.6.4 Biological Resources

The project site has been the subject of numerous professional biological studies since 2005, with the most recent evaluations conducted in 2012 and 2013 in connection with the preparation of this EIR. These reports are included in the appendices of this EIR and are discussed in detail in Section 4.4 in this EIR. The biological studies show that the vast majority of the project site (97.4%) is disturbed by human activity, mostly dry-land farming, with less than 3 percent of the area consisting of native plant communities. These conditions are discussed in depth in Section 4.4 of this EIR.

The biological studies evaluated the project site for the presence of wildlife and specifically any threatened or endangered species. The studies conclude that the project site is not located within any United States Fish and Wildlife Service (USFWS) designated Critical Habitat area and no threatened or endangered species were observed within the project site during any of the field surveys. Further, no evidence of any California State endangered, threatened or protected wildlife species was found on the project site.

Suitable habitat was identified in the project site for the burrowing owl and the Los Angeles Pocket Mouse (both species of special concern) and mitigation measures are included to require site-specific biological evaluations to address these species prior to any site grading.

Impacts to jurisdictional waters/wetlands and to habitat fragmentation/wildlife movement were found to be less than significant. Impacts to endangered and threatened species may be significant and mitigation is included. The project has the potential to result in significant impacts to riparian habitat and sensitive natural communities and may require subsequent permits from various resource agencies depending on the details of each site-specific development proposal.

Other mitigation measures require the establishment of building setbacks along the boundary with the San Jacinto Wildlife Area (SJWA), a runoff management plan and a Biological Resources Management Plan for the SJWA edge, payment of Multi-Species Habitat Conservation Plan fees, prohibition of invasive plant species, and compensation for riparian habitat. A complete list of mitigation measures is included in Table 1.B in this Executive Summary.

More than 900 acres of the Moreno Highland master-planned community zoned for residential industrial and recreational uses was purchased by the State in 2001 to serve as a buffer from future development to the north. This development area to the north is being planned as the World Logistics Center. The referenced 900+ acres area will continue to serve that buffer purpose. Additionally, the WLC property is more than 4,000 feet (more than $\frac{3}{4}$ of a mile) from the closest sensitive habitat on SJWA property with the intervening property being used as cultivated farmland and disked regularly as it has for many decades.

The Specific Plan provides for a continuous buffer along the SJWA property that will include native landscaping, an extensive network of landscaped drainage facilities, trees and shrubs specifically selected to accommodate and support local wildlife, all of which will contribute to an environmentally-sensitive interface between the WLC and the SJWA property.

1.6.5 Cultural and Paleontological Resources

A thorough cultural resources study was conducted for the project area in connection with the project EIR and is discussed in Section 4.6. The area includes several known cultural (Native American) resources as well and other potential historical resources. This topic is discussed in Section 4.5.

The project has been designed to avoid any of the known Native American resources; designating sensitive areas as Open Space, realigning a proposed trail around the existing resources, and protecting the resources from disturbance. Further evaluations will be conducted in connection with site-specific project proposals prior to the issuance of any grading permits.

Consultations between Native American tribal groups and the City have been initiated pursuant to SB 18 and are ongoing.

Impacts to archaeological resources were determined to be potentially significant and mitigation measures are included to reduce the impacts. Mitigation measures include historical evaluations of all project sites, archaeological/paleontological monitoring of all project grading. Native American representatives will be invited to monitor all grading activities.

1.6.6 Geology and Soils

A detailed geotechnical evaluation was conducted for the project site in connection with the preparation of this EIR and is discussed in Section 4.6. The report evaluated faulting and seismicity,

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soils and geologic and seismic hazards affecting the property. Impacts due to landslides and rockfalls, soil erosion or loss of topsoil, septic tanks, and seismic-related ground failure were considered less than significant and no mitigation is required. Impacts due to fault rupture, ground shaking and unstable soils were considered to be potentially significant and mitigation measures are included to reduce the significance of the identified impacts. Mitigation measures include preparation of site-specific design-level geotechnical investigations and application of all applicable code standards and requirements prior to the issuance of any grading or building permits.

1.6.7 Greenhouse Gas Emissions, Climate Change and Sustainability

An evaluation of the World Logistics Center's greenhouse gas impact and contribution to global climate change was conducted and is presented in Section 4.7. Greenhouse gas emissions were quantified for both direct emissions (e.g., motor vehicles) and indirect emissions (e.g., electricity generation and water delivery). In the past few years, the State of California has changed the way it regulates greenhouse gases. Under Assembly Bill 32, the Global Warming Solutions Act of 2006, the California Air Resources Board (CARB) has established a cap-and-trade program which differentiates between emissions that fall under the AB 32 restrictions and those that do not. Those emissions that fall under the restrictions of the cap include those emissions that derive from electricity generation, transportation fuels, natural gas use, and large industrial sources. This differentiation, explained in more detail in Section 4.7 and Appendix D, was used as part of the greenhouse gas analysis.

Greenhouse gas emissions were segregated between capped and uncapped emissions. The state has created a comprehensive regulatory program that determines the future allowable emissions that fall under the cap-and-trade cap. Significance was determined by comparing uncapped emissions to SCAQMD's significance threshold of 10,000 metric tons of CO₂ equivalent annually (CO₂e, or carbon dioxide equivalent, is a standard unit for measuring carbon footprints. It expresses the impact of each different greenhouse gas in terms of the amount of CO₂ that would create the same amount of warming). Examples of project emissions that fall under the cap include greenhouse gas emissions from transportation sources (trucks and cars), electricity use (from offsite power generation), and water use (from off-site power generation to convey water). Examples of project emissions that fall outside the cap include waste generation from landfill emissions caused by waste generated onsite and the use of refrigerants.

Mitigation for the proposed project includes increased waste diversion requiring 75 percent of all waste to be diverted to landfills and increased energy efficiency by exceeding California's Title 24 requirements (California's energy efficiency standards) by at least 10 percent. Additionally, the Specific Plan requires that on-site solar systems be provided to offset the demand of office space in the WLC, estimated at 13 megawatts of power at buildout. This is the equivalent amount of power used by over 1,700 homes. After mitigation, the remaining emissions from the project have a less than significant impact. A complete listing of mitigation measures can be found in Section 4.7 and Table 1.B in this Executive Summary.

1.6.8 Hazards and Hazardous Materials

An evaluation of Hazards and Hazardous Materials is discussed in Section 4.8 of the EIR. Historic land uses for the project site have included agricultural activities, two dairies, a chicken ranch, and scattered residential uses. Currently, nearly the entire site is used for dryland farming, which typically does not apply pesticides or other agricultural chemicals. The Phase 1 reports did not find significant residual pesticides on the project site and revealed no evidence of recognized environmental conditions on, at, in, or to the project site.

Sempra Energy operates a natural gas compressor facility near the WLC project. The EIR assessed the potential impacts of the facility on the future development of WLC property and found that compliance with existing safety regulations applicable to the Sempra plant plus the Specific Plan's requirement for a 1,000-foot setback between Sempra buildings and future WLC buildings reduced any potential impact to a less than significant level and no mitigation is required.

In addition, a fueling station is required to be constructed within the WLC project area. The EIR assessed the potential impacts of such a facility and found that with the application of a mitigation measure requiring preparation of a risk assessment prior to any project approvals, potential impacts would be reduced to a less than significant level.

1.6.9 Hydrology, Drainage, and Water Quality

The EIR evaluated potential impacts to hydrology, drainage, and water quality (Section 4.9) and found that environmental impacts in these areas were less than significant and do not require mitigation. Potential impacts from construction-related water quality impacts, operation-related water quality impacts, and drainage capacity-related impacts could be mitigated to less than significant. The project would incorporate a number of mitigation measures to reduce these impacts which are detailed in Table 1.B. Among the mitigation measures is MM 4.9.6.1A, which requires the management of flow rates, velocities, and volumes at pre-project levels and the maintenance of historic groundwater recharge (water balance) rates. The project would also be required to implement a Storm Water Pollution Prevention Plan (SWPPP), a Water Quality Management Plan (WQMP), and development of an ongoing Water Quality Sampling Program (WQSP) to protect the San Jacinto Wildlife Area.

1.6.10 Land Use and Planning

The EIR evaluates the WLC project's impact on current on-site and adjacent land uses as well as the project's impacts on existing City land use policies (Section 4.10). The WLC project will replace the present Moreno Highlands Specific Plan, a largely residential, mixed-use project that included 7,700 residential units and 600+ acres of business park and mixed-use designations, with a project proposing 40.6 million square feet of logistics uses.

The EIR concludes that the WLC project is consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and is generally consistent with SCAG's Regional Comprehensive Plan, Compass Plan and Regional Transportation Plan.

The project is consistent with the City's Economic Development Action Plan which encourages the development of job-producing land uses in the eastern portion of the City. See DEIR Section 3.6.1 for 2011 and 2013 Economic Development Action Plan Objectives related to the WLC.

1.6.11 Mineral Resources

The EIR evaluated whether the project site contains any significant mineral resource areas, defined by the State as Mineral Resources Zone 2 areas. See Section 4.11 for the detailed analysis.

Lands within the City of Moreno Valley are designated MRZ-3 and MRZ-4, pursuant to the Surface Mining and Reclamation Act of 1975. These zones are not defined as significant mineral resource areas. No sites have been designated as locally-important mineral resource recovery sites on any local plan.

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The EIR concluded that the development of the WLC project would not result in a loss of statewide, regional or locally important mineral resources and will not have any significant impact regarding such resources. No mitigation is required.

1.6.12 Noise

Project noise impacts were analyzed and the results are described in Section 4.12. As part of the analysis, existing noise levels were measured. Estimates of future noise levels as a result of the project and increases in background noise levels were assessed to determine where significant noise impacts would occur. Generally, project-related noise impacts occur as a result of two types of activity: construction noise and traffic noise occurring as a result of increased project-related vehicle trips. Several measures have been identified that impose operational controls during construction activities to reduce noise impacts or require noise abatement, such as sound walls to reduce impacts from project operation. Examples of operational controls to reduce noise impacts include maintaining minimum distances from homes during nighttime grading activities and limiting the hours of offsite construction.

Examples of noise abatement mitigation measures include the construction of sound walls at various locations and the requirement for noise barriers located along the perimeter of property that faces any residential areas. While most noise impacts were able to be mitigated to a less than significant level, there are a few areas where significant impacts remain, either as a result of construction activities or the infeasibility of mitigation such as sound walls in specific locations, such as where residential access would be blocked. Section 4.12 details the location specific noise impacts and mitigation measures that have been identified for the proposed project. The majority of noise impacts from the WLC in residential areas are the result of passenger vehicles, not trucks. The WLC design directs all truck traffic away from residential areas. Other potential land uses for the project site could generate similar or greater noise impacts. For instance, the current Moreno Highlands Specific Plan would result in significantly more vehicle trips than the proposed World Logistics Center. As a result, Noise impacts would be expected to be higher under that scenario.

1.6.13 Population, Housing and Employment

The EIR evaluated potential impacts to Population, Housing and Employment (Section 4.13) and found impacts to population growth, displacement of housing/people, and cumulative impacts to population and housing were less than significant and did not require mitigation.

An economic study of the Project prepared by David Taussig and Associates (DTA) concluded that the WLC Project could generate approximately 20,307 new on-site jobs within the City. In addition to the projected on-site job creation, the DTA study estimates the WLC Project could generate new off-site jobs (i.e., indirect/induced employment) in all industries of the economy. The DTA study estimated that an additional 7,386 indirect/induced jobs could be created in the County, of which 3,693 jobs were projected to be within the City as a result of Project implementation. While the specific location of the potential additional indirect/induced jobs created within the County cannot be specifically determined, it is reasonable to assume that some percentage of these jobs will be support service jobs and are likely to be located in the WLC Project vicinity, and therefore the City. A stronger jobs base can support improved property values and the general economic well-being of the City.

The WLC project is directly consistent with the City's adopted Economic Development Action Plan, which calls for focused efforts to create more jobs-related land uses, specifically logistics uses in the eastern portion of the City. See DEIR Section 3.6.1 for 2011 and 2013 Economic Development Action Plan Objectives related to the WLC.

The Fiscal and Economic Impact Study prepared by DTA concluded that the WLC project could generate approximately \$11,257,000 in annual revenues while causing the City to annually incur approximately \$5,557,000 in costs resulting in an annual surplus of almost \$5,700,000 once the project is fully built out. These surplus funds could be used to fund police, fire, health and senior programs and services throughout the City. Additional funding surpluses were identified relative to the Moreno Valley Fire Tax which is estimated to generate an additional \$1,800,000 from WLC development for other fire-related needs elsewhere in the City. Including the projected Fire Tax surplus, the build out of the WLC is expected to raise the projected tax surplus to the City of approximately \$7,500,000.

1.6.14 Public Services and Facilities

The EIR evaluated the project's impact on police services, fire protection, schools and parks. See Section 4.14 for the complete analysis. The EIR concluded that as a result of the project's obligation to pay its fair share of applicable City costs the WLC project will not have a significant impact on the City's ability to provide these public services and facilities.

The EIR's Fiscal and Economic Impact Study (Appendix O) estimates that the projected build out of 40.6 million square feet of building will generate more than \$4.7 million for police facilities and more than \$10 million for fire facilities from the Development Impact Fee (DIF) program (using 2013 rates) and more than \$19 million in school fees. In addition, the study estimates that the WLC will generate more than \$11 million every year in taxes, fees, licenses, etc. while requiring \$5.7 million in services, resulting in an annual surplus of nearly \$6 million to the General Fund. A complete analysis is included in the Fiscal and Economic Impact Study.

Notably, the WLC is estimated to generate additional funding for fire services through the Moreno Valley Fire property tax that is separate from General Fund revenue sources. The Moreno Valley Fire property tax averages 5.54 percent of the total property taxes levied in the Center, which yields a total of \$1.8 million in recurring annually surplus that can be spent on fire services in other parts of the City. Adding this \$1.8 million in Moreno Valley Fire property tax surplus to the \$5.7 million General Fund surplus is estimated to yield a total annual recurring surplus of \$7.5 million generated by the WLC.

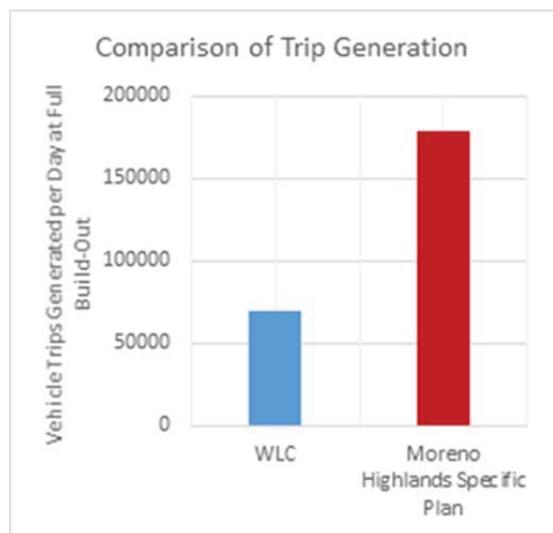
The EIR concluded that the project will not have a significant impact to Public Services and Facilities. No mitigation measures are proposed.

1.6.15 Traffic and Circulation

A comprehensive Traffic Impact Analysis (TIA) was prepared to evaluate the WLC's impacts within Moreno Valley and throughout the region and is discussed in Section 4.15. The traffic analysis encompasses road segments spanning from the project site 75 miles to the west, all the way to the Ports of Los Angeles and Long Beach, 30 miles to the east beyond the City of Banning, 20 miles to the south and 15 miles to the north.

As indicated in the table to the right below, 80 percent of the traffic would be generated from Passenger Cars, 12 percent of the traffic generated by the project would be classified as Heavy-duty Trucks, and about 8 percent of the traffic would be generated by Light and Medium Duty Trucks.

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Type of Vehicle	Number of Daily Trips
Passenger Cars	54,714
Light-duty Trucks (2-axle)	2,385
Medium-duty Trucks (3-axle)	3,181
Heavy-duty Trucks (4-axle)	8,440
Total Daily Trips	68,720

The total number of daily trips generated by the project is 68,720. As shown in the chart above to the left, this represents a 61% reduction, or 100,000 less daily trips generated, compared to the City’s General Plan/zoning designations for the project area (i.e., the Moreno Highlands Specific Plan MHSP).

Located at the eastern end of the City, the WLC will result in a reverse commute travel pattern. The traffic analysis indicates that many residents currently head west out of Moreno Valley for jobs. With thousands of job opportunities created as a result of the project in the eastern portion of the City, future employees will travel in the eastbound direction to the WLC where there is much less traffic. Those who would continue to commute westbound in the morning will have less traffic to deal with as some of the residents that are now or would be headed westbound would be diverted in the eastbound direction traveling to their jobs at the WLC.

1.6.16 Utilities and Service Systems

The EIR evaluated potential impacts to Utilities and Service Systems (Section 4.16) and found that impacts to these systems were generally less than significant and do not require mitigation. Potential impacts to storm water drainage requirements, adequate water supply, and electrical and natural gas facilities were able to be mitigated to less than significant.

The World Logistics Center emphasizes water conservation, and the landscape program is designed to achieve the project’s landscape goals while consuming as little water as possible. This approach represents a significant departure from conventional development strategies, particularly in a large-scale master-planned logistics campus setting. Most of the project will be designed without mechanical irrigation, relying instead on maximizing the collection and harvesting of runoff to be directed to landscape areas. Mitigation measures include use of drought tolerant landscaping, using “dry” cleaning equipment, use of weather-based automatic irrigation controllers, use of irrigation systems primarily at night or early morning, use of recirculation system for any outdoor water feature, use of low-flow sprinkler heads and use of reclaimed water for irrigation if it becomes available. Additional mitigation measures include use of flash water heaters, automatic on/off water facets, water efficient appliances, exceedance of the energy-conservation requirements of title 24 (2008) by 10 percent, LEED Certification, and solar panels to offset the power demand for office space in each building. Mitigation Measures for each of the affected areas are listed in Table 1.B.

1.7 PUBLIC INVOLVEMENT

The EIR process for the proposed project has involved input from the public and affected agencies at several steps. A Notice of Preparation (NOP) was issued on February 26, 2012, to notify state agencies and the public that an EIR was going to be prepared for the WLC project. The NOP was circulated for 30 days as required by CEQA. The distribution list, Notice of Public Scoping Meeting, and response letters are included in Appendix A of the Draft EIR. As of the close of the 30-day NOP public review period, ten responses to the NOP had been received from public agencies, four from conservation organizations, and 14 responses from members of the public.

On March 12, 2012, the City held a public scoping meeting to solicit input on concerns the public had about the project and issues that should be addressed in the EIR. There were 33 individual speakers including one agency (SCAQMD); 33 letters and comment cards were submitted during or subsequent to the scoping meeting.

The Draft EIR was circulated for a 60-day public review period, at which time agencies and the public were invited to comment on the technical studies and analysis of environmental issues in the EIR. The Draft EIR was circulated between February 5 and April 8, 2013, a total of 63 days. All written comments on the Draft EIR received written responses, and the City carefully evaluated all available information on the project. A more thorough discussion of input from the public and affected agencies is presented in Section 2.0, *Introduction*. Table 2.A, in the next section, summarizes the comments received regarding the NOP.

1.8 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

The EIR discusses impacts that would occur to on-site and off-site uses as a result of implementation of the project. This EIR also includes proposed mitigation measures that have been identified to reduce or avoid significant effects that would result from the construction and operation of the proposed on-site uses. *CEQA Guidelines* Section 15123(b)(2) requires that areas of controversy known to the Lead Agency (City of Moreno Valley) be stated in the EIR summary. The following discussion identifies issues raised by other agencies and the public during the 30-day public comment period of the NOP, as well as comments received during the public scoping meeting for the proposed project.

Local residents indicated they understood the desire of the City to add employment during these economic times, but also expressed concerns about the following potential impacts associated with the industrial warehouse uses proposed by the WLC project:

- Loss of views from SR-60 and Gilman Springs Road. This issue is discussed in Section 4.1, *Aesthetics*, of this EIR.
- Short-term and long-term air pollutant emissions including dust, diesel particulates, and health risks from truck exhaust that could negatively affect nearby residential uses. These issues are discussed in Section 4.3, *Air Quality*, of this EIR.
- Indirect impacts on wildlife utilizing the San Jacinto Wildlife Area south of the site. This issue is discussed in Section 4.4, *Biological Resources*, of this EIR.
- Potential loss of cultural (archaeological) resources by grading and development of the site, and suggestions to consult with local Native American tribes per SB 18. These issues are discussed in Section 4.4, *Biological Resources*, and 4.5, *Cultural Resources*, of this EIR.
- Concerns about several geologic faults that cross the project site. This issue is discussed in Section 4.6, *Geology and Soils*, in this EIR.

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- In addition to air quality impacts, concerns were expressed about the project emitting large quantities of greenhouse gases and their influence on global climate change. These impacts are addressed in Section 4.7, *Greenhouse Gases and Global Climate Change*, in the EIR.
- Potential water-related impacts (drainage and water quality of runoff from the project) are addressed in Section 4.9, *Hydrology and Water Quality*, in the EIR.
- Loss of affordable housing identified in the Moreno Highlands Specific Plan currently approved for the project site. This issue is discussed in Section 4.10, *Land Use and Planning*, and Section 4.13, *Population, Housing, and Employment*, of this EIR.
- Short-term and long-term noise impacts that could affect nearby residential uses. These issues are discussed in Section 4.12, *Noise*, of this EIR.
- Project truck traffic causing congestion on local roads, potential of traveling through residential neighborhoods, intersections, and freeway ramps, primarily on Redlands Boulevard, and impacts to vehicular, bicycle, and pedestrian safety. These issues are discussed in Section 4.15, *Traffic and Transportation*, of this EIR.

1.9 SIGNIFICANT IMPACTS

The project will have significant adverse impacts even following adoption of all feasible mitigation measures. The following significant environmental impacts have been identified in the EIR and will require mitigation but cannot be mitigated to a level of insignificance. Sections 4.1 through 4.16 of the EIR identify the following significant impacts of the WLC project after mitigation:

- Aesthetics: Scenic Vistas.
- Aesthetics: Scenic Resources and Scenic Highways.
- Aesthetics: Substantial degradation of the existing visual character or quality of the site and its surroundings.
- Aesthetics: Cumulative Aesthetic Impacts.
- Air Quality: Construction Air Pollutant Emissions.
- Air Quality: Architectural Coating Emissions.
- Air Quality: Operational Air Pollutant Emissions.
- Air Quality: Consistency with Air Quality Management Plan (AQMP).
- Air Quality: Cumulative Air Pollutant Emissions.
- Land Use and Planning: Divide an Existing Neighborhood (impacts on existing residences).
- Noise: Short-Term Construction Noise.
- Noise: Long-Term Traffic Noise.
- Noise: Cumulative Noise Levels.
- Transportation: Off-Site Impacts to TUMF Facilities.
- Transportation: Off-Site Improvements to Roads Outside the Jurisdiction of the City and Not Part of the TUMF Program.

1.10 IMPACTS, MITIGATION, AND LEVEL OF IMPACTS SUMMARY TABLE

Table 1.B provides a summary of the proposed project impacts, proposed mitigation measures, and the level of significance of each impact following the application of identified mitigation measures.

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NOTE TO READER: The mitigation measure summaries have been removed from Revised DEIR Table 1.B World Logistics Center Project Environmental Impact Summary and replaced with the revised mitigation measures in their entirety. For this reason, Original DEIR Table 1.B List of All Mitigation Measures has also been deleted.

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Issues/Impacts	Mitigation Measures	Level of Significance
4.1 Aesthetics		
LESS THAN SIGNIFICANT IMPACTS		
None		
SIGNIFICANT IMPACTS		
Impact 4.1.6.1 Scenic Vistas		
The WLC project will significantly impact viewsheds in the area, including views of the Mt. Russell Range and the Badlands.	<p>4.1.6.1A Each Plot Plan application for development along the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing or planned residential zoned uses) shall include a minimum 250-foot setback measured from the City/County zoning boundary line and any building or truck parking/access area within the project. The setback area shall include landscaping, berms, and walls to provide visual screening between the new development and existing residential areas upon maturity of the landscaping materials. The existing olive trees along Redlands Blvd. shall remain in place as long as practical to help screen views of the project site. This measure shall be implemented to the satisfaction of the Planning Official.</p> <p>4.1.6.1B Each Plot Plan application for development adjacent to Redlands Boulevard, Bay Avenue, or Merwin Street, shall include a plot plan, landscaping plan, and visual rendering(s) illustrating the appearance of the proposed development. The renderings shall demonstrate that views of proposed buildings and trucks can be reasonably screened from view from existing residents upon maturity of planned landscaping and to ensure consistency with the General Plan Objective 7.7. "Effective" screening shall mean that no more than the upper quarter (25%) of a building is visible from existing residences, which shall be achieved through a combination of landscaping, berms, fencing, etc. The location and number of view presentations shall be at the discretion of the Planning Division.</p> <p>4.1.6.1C Prior to the issuance of a certificate of occupancy for buildings adjacent to the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing residences at the time of application) the screening required in Mitigation Measure 4.1.6.1A shall be installed in substantial conformance with the approved</p>	Significant and Unavoidable
Not applicable		

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<p>4.1.6.1D</p>	<p>plans to the satisfaction of the Planning Official.</p> <p>Prior to the issuance of permits for any development activity adjacent to Planning Area 30 (74.3 acres in the southwest portion of the Specific Plan), the entirety of Planning Area 30 shall be offered to the State of California for open space purposes. In the event that the State does not accept the dedication, the property shall be offered to Western Riverside County Regional Conservation Authority or an established non-profit land conservancy for open space purposes. In the event that none of these organizations accepts the dedication, the property may be dedicated to a property owners association or may remain in private ownership and may be fenced and access prohibited.</p>	
<p>Impact 4.1.6.2 Scenic Resources and Scenic Highways</p>		
<p>The WLC project will significantly impact existing viewsheds from SR-60 which is a locally designated scenic route.</p>	<p>Previously referenced Mitigation Measures 4.1.1.6A through 4.1.16D</p>	<p>Significant and Unavoidable</p>
<p>Impact 4.1.6.3 Existing Visual Character and its Surroundings</p>		
<p>The WLC project will fundamentally change views of the area from agriculture to large warehouses.</p>	<p>Each Plot Plan application for development shall include plans and visual rendering(s) illustrating any changes in views of Mount Russell and/or the Badlands, for travelers along SR-60, as determined necessary by the Planning Official. The plans and renderings shall illustrate typical views based on proposed project plans, with the location and number of view presentations to be determined by the Planning Official. These views shall be simulated from a height of six feet from the edge of the roadway travel lane closest to the visual resource. The renderings must demonstrate that the development will preserve at least the upper two thirds (67%) of the vertical view of Mt. Russell from SR-60.</p>	<p>Significant and Unavoidable</p>
<p>Impact 4.1.6.4 Light and Glare</p>		
<p>The WLC project will significantly impact the area by substantially increasing lighting and glare in the area.</p> <p>4.1.6.4A</p> <p>4.1.6.4B</p>	<p>Each Plot Plan application for development adjacent to residential development shall include a photometric plot of all proposed exterior lighting demonstrating that the project is consistent with the requirements of Section 9.08.100 of the City Municipal Code. The lighting study shall indicate the expected increase in light levels at the property lines of adjacent residential uses. The study shall demonstrate that the proposed lighting fixtures and/or visual screening meet or exceed City standards regarding light impacts.</p> <p>Each Plot Plan application for development shall include an analysis of all proposed solar panels demonstrating that glare from panels will not negatively affect adjacent residential uses or negatively affect motorists along perimeter roadways. Design</p>	<p>Less than Significant with Mitigation</p>

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<p>details to meet these requirements shall be implemented to the satisfaction of the Planning Official.</p>		
<p>Cumulative Aesthetic Impacts</p>		
<p>The cumulative effect of development in the region will continue to modify existing viewsheds, especially along SR-60. Cumulative impacts would remain significant and unavoidable.</p>	<p>Previously referenced Mitigation Measures 4.1.6.1A through 4.1.6.1D, 4.1.6.3A, 4.1.6.4A and 4.1.6.4B</p>	<p>Significant and Unavoidable</p>
<p>4.2 Agriculture</p>		
<p>LESS THAN SIGNIFICANT IMPACTS</p>		
<p>Forest Land Zoning</p>		
<p>There are no significant impacts because there are no areas designated as forest land or timberland on the project site.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Loss or Conversion of Forest Land</p>		
<p>There are no forest lands on the project site or in the surrounding area.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Existing Zoning and Williamson Act</p>		
<p>There are no Williamson Act Contracts on or adjacent to the project site.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
<p>SIGNIFICANT IMPACTS</p>		
<p>Impact 4.2.6.1 Farmland Conversion</p>		
<p>The project will convert 25 acres of land designated Unique Farmland by the state to urban uses.</p>	<p>4.2.6.1A Prior to the issuance of any grading permit affecting land designated as “Unique Farmland” (Figure 4.2.2 in the World Logistics Center Environmental Impact Report), an Agricultural Conservation Easement shall be recorded over land of equivalent or better agricultural economic productivity of the offsite easement property compared to the World Logistics Center property. The analysis will include a comparison of the project’s “Unique Farmland” considering its relative economic potential as the best measure of productivity (i.e., net profitability per acre or potential net rental income per acre). It will include a consideration of various important physical factors including location and accessibility, soils and topography, micro and macro climatic conditions, water availability and quality, as well as local practices, good farm</p>	<p>Less than Significant with Mitigation</p>

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<p>Impact 4.2.6.2 Conversion of Farmland to Non-Agricultural Uses</p> <p>The project will convert 2,610 acres of Farmland of Local Importance to urban uses.</p>	<p>management and cultural (growing) costs. The form and content of this easement, as well as the estimates of agricultural productivity, shall be reviewed and approved in advance by the Planning Official.</p> <p>Previously referenced Mitigation Measures 4.2.6.1A and 4.2.6.1B</p>	<p>Less than Significant with Mitigation</p>
<p>Cumulative Agricultural Impacts</p> <p>As urban development continues in the City and surrounding areas, there will be a cumulative loss of agricultural land through conversion to urban uses. This conversion is a long-established historical process based on local and regional economic conditions, resulting in the eventual relocation of farming to more rural and outlying areas (e.g., Coachella Valley, Kern County, etc.).</p>		
<p>4.3 Air Quality</p> <p align="center">LESS THAN SIGNIFICANT IMPACTS</p>		
<p>Odors</p>		
<p>The proposed project involves large warehouses and no uses that would generate substantial odors. The natural gas facilities on site sometimes generate temporary odors from natural gas blow-offs, but these are not considered significant impacts.</p>	<p>No mitigation is required.</p>	<p>Less than Significant.</p>
<p>Long-Term Microscale (CO Hot Spot) Emissions</p>		
<p>The project air quality study determined that project-related traffic would not create any CO hot spots on local roadways through project buildout.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>

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SIGNIFICANT IMPACTS		
Impact 4.3.6.1 Air Quality Management Plan Consistency		
<p>The land uses of the proposed project are not consistent with those used to prepare the most current AQMP. Although the project would substantially improve the jobs/housing balance of the City by introducing more employment-generating uses than new housing, it would exceed applicable thresholds for all criteria pollutants, with the exception of SO_x. Despite the implementation of mitigation measures for both construction and operation, emissions associated with the proposed project cannot be reduced below applicable SCAQMD thresholds.</p>	<p>Implementation of Mitigation Measures 4.3.6.2A through 4.3.6.2D, 4.3.6.3A through 4.3.6.3E, and 4.3.6.4A will help reduce air pollutant emissions of the project, but it will still be inconsistent with the AQMP.</p>	<p>Significant and Unavoidable</p>
Impact 4.3.6.2 Construction Equipment Exhaust Emissions		
<p>Future development within the WLCSP will exceed daily air pollutant significance criteria established by the SCAMQD for construction-related activities.</p>	<p>Construction equipment maintenance records (including the emission control tier of the equipment) shall be kept on site during construction and shall be available for inspection by the City of Moreno Valley.</p> <ul style="list-style-type: none"> a) Off-road diesel-powered construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency Tier 4 off-road emissions standards. A copy of each unit's certified tier specification shall be available for inspection by the City at the time of mobilization of each applicable unit of equipment. b) During all construction activities, off-road diesel-powered equipment may be in the "on" position not more than 10 hours per day. c) Construction equipment shall be properly maintained according to manufacturer specifications. d) All diesel powered construction equipment, delivery vehicles, and delivery trucks shall be turned off when not in use. On-site idling shall be limited to three minutes in any one hour. e) Electrical hook ups to the power grid shall be provided for electric construction tools including saws, drills and compressors, where feasible, to reduce the need for diesel-powered electric generators. Where feasible and available, electric 	<p>Significant and Unavoidable</p>

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	<p>tools shall be used</p> <ul style="list-style-type: none"> f) The project shall demonstrate compliance with South Coast Air Quality Management District Rule 403 concerning fugitive dust and provide appropriate documentation to the City of Moreno Valley. g) All construction contractors shall be provided information on the South Coast Air Quality Management District Surplus Off-road Opt-In “SOON” funds which provides funds to accelerate cleanup of off-road diesel vehicles. h) Construction on-road haul trucks shall be model year 2007 or newer. i) Information on ridesharing programs shall be made available to construction employees. j) During construction, lunch options shall be provided onsite. k) A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints per AQMD Standards. l) Only non-diesel material handling equipment may be used in any logistics building in the WLC. m) Off-site construction shall be limited to the hours between 6 a.m. to 8 p.m. on weekdays only. Construction during City holidays shall not be permitted. <p>4.3.6.2B</p> <p>Prior to issuance of any grading permits, a traffic control plan shall be submitted to and approved by the City of Moreno Valley that describes in detail the location of equipment staging areas, stockpiling/storage areas, construction parking areas, safe detours around the project construction site, as well as provide temporary traffic control (e.g., flag person) during construction-related truck hauling activities. Construction trucks shall be rerouted away from sensitive receptor areas. Trucks shall use State Route 60 using Theodore Street, Redlands Boulevard (north of Eucalyptus Avenue), and Gilman Springs Road. In addition to its traffic safety purpose, the traffic control plan can minimize traffic congestion and delays that increase idling emissions. A copy of the approved Traffic Control Plan shall be retained on site in the construction trailer.</p> <p>4.3.6.2C</p> <p>The following measures shall be applied during construction of the project to reduce volatile organic compounds (VOC):</p> <ul style="list-style-type: none"> a) Non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall 	

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<p>4.3.6.2D</p>	<p>be used in the construction of the project to the maximum extent practicable. If such products are not commercially available, products with a VOC content of 100 grams per Liter or lower for both interior and exterior surfaces shall be used.</p> <ul style="list-style-type: none"> b) Leftover paint shall be taken to a designated hazardous waste center. c) Paint containers shall be closed when not in use d) Low VOC cleaning solvents shall be used to clean paint application equipment. e) Paint and solvent-laden rags shall be kept in sealed containers. <p>No grading shall occur on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 24).</p>	
<p>Impact 4.3.6.3 Localized Construction and Operation Emissions</p>		
<p>Future development within the WLCSP will exceed local significance thresholds of the SCAMQD for trucks and other operational activities.</p>	<p>4.3.6.3A Prior to issuance of occupancy permits for each warehouse building within the WLCSP, the developer shall demonstrate to the City that vehicles can access the building using paved roads and parking lots.</p> <p>4.3.6.3B The following shall be implemented as indicated:</p> <p>Prior to Issuance of a Certificate of Occupancy</p> <ul style="list-style-type: none"> a) Signs shall be prominently displayed informing truck drivers about the California Air Resources Board diesel idling regulations and the prohibition of parking in residential areas. b) Signs shall be prominently displayed in all dock and delivery areas advising of the following: engines shall be turned off when not in use; trucks shall not idle for more than three consecutive minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report air quality violations. c) Signs shall be installed at each exit driveway providing directional information to the City's truck route. Text on the sign shall read "To Truck Route" with a directional arrow. Truck routes shall be clearly marked per the City Municipal Code. <p>On an Ongoing Basis</p> <ul style="list-style-type: none"> d) Tenants shall maintain records on fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles are maintained pursuant to 	<p>Significant and Unavoidable</p>

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	<p>manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.</p> <ul style="list-style-type: none"> e) Tenant's staff in charge of keeping vehicle records shall be trained/certified in diesel technologies, by attending California Air Resources Board approved courses (such as the free, one-day Course #512). Documentation of said training shall be maintained on-site and be available for inspection by the City. f) Tenants shall be encouraged to become a SmartWay Partner. g) Tenants shall be encouraged to utilize SmartWay 1.0 or greater carriers. h) Tenants' fleets shall be in compliance with all current air quality regulations for on-road trucks including but not limited to California Air Resources Board's Heavy-Duty Greenhouse Gas Regulation and Truck and Bus Regulation. i) Information shall be posted in a prominent location available to truck drivers regarding alternative fueling technologies and the availability of such fuels in the immediate area of the World Logistics Center. j) Tenants shall be encouraged to apply for incentive funding (such as the Voucher Incentive Program [VIP], Carl Moyer, etc.) to upgrade their fleet. k) All yard trucks (yard dogs/yard goats/yard jockeys/yard hostlers) shall be powered by electricity, natural gas, propane, or an equivalent non-diesel fuel. Any off-road engines in the yard trucks shall have emissions standards equal to Tier 4 Interim or greater. Any on-road engines in the yard trucks shall have emissions standards that meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025. l) All diesel trucks entering logistics sites shall meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Facility operators shall maintain a log of all trucks entering the facility to document that the truck usage meets these emission standards. This log shall be available for inspection by City staff at any time. m) All standby emergency generators shall be fueled by natural gas, propane, or any non-diesel fuel. n) Truck and vehicle idling shall be limited to three (3) minutes. 	
4.3.6.3C	Prior to the issuance of building permits for more than 25 million square feet of	

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<p>Impact 4.3.6.4 Long-Term Operational Emissions</p> <p>Future development within the WLCSP will exceed daily air pollutant significance criteria established by the SCAMQD for trucks and other operational activities.</p>	<p>logistics warehousing within the Specific Plan area, a publically-accessible fueling station shall be operational within the Specific Plan area offering alternative fuels (natural gas, electricity, etc.) for purchase by the motoring public. Any fueling station shall be placed a minimum of 1000 feet from any off-site sensitive receptors or off-site zoned sensitive uses. This facility may be established in connection with the convenience store required in Mitigation Measure 4.3.6.3D.</p> <p>4.3.6.3D Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area a site shall be operational within the Specific Plan area offering food and convenience items for purchase by the motoring public. This facility may be established in connection with the fueling station required in Mitigation Measure 4.3.6.3C.</p> <p>4.3.6.3E Refrigerated warehouse space is prohibited unless it can be demonstrated that the environmental impacts resulting from the inclusion of refrigerated space and its associated facilities, including, but not limited to, refrigeration units in vehicles serving the logistics warehouse, do not exceed any environmental impact for the entire World Logistics Center identified in the program Environmental Impact Report. Such environmental analysis shall be provided with any warehouse plot plan proposing refrigerated space. Any such proposal shall include electrical hookups at dock doors to provide power for vehicles equipped with Transportation Refrigeration Units (TRUs).</p>	<p>Significant and Unavoidable</p>
	<p>The following measures shall be incorporated as conditions to any Plot Plan approval within the Specific Plan:</p> <ul style="list-style-type: none"> a) All tenants shall be required to participate in Riverside County's Rideshare Program. b) Storage lockers shall be provided in each building for a minimum of three percent of the full-time equivalent employees based on a ratio of 0.50 employees per 1,000 square feet of building area. Lockers shall be located in proximity to required bicycle storage facilities. c) Class II bike lanes shall be incorporated into the design for all project streets. d) The project shall incorporate pedestrian pathways between on-site uses. e) Site design and building placement shall provide pedestrian connections between internal and external facilities. 	<p>Significant and Unavoidable</p>

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	<p>f) The project shall provide pedestrian connections to residential uses within 0.25 mile from the project site.</p> <p>g) A minimum of two electric vehicle-charging stations for automobiles or light-duty trucks shall be provided at each building. In addition, parking facilities with 100 parking spaces or more shall be designed and constructed so that at least three percent of the total parking spaces are capable of supporting future electric vehicle supply equipment (EVSE) charging locations. Only sufficient sizing of conduit and service capacity to install Level 2 Electric Vehicle Supply Equipment (EVSE) or greater are required to be installed at the time of construction.</p> <p>h) Each building shall provide indoor and/or outdoor - bicycle storage space consistent with the City Municipal Code and the California Green Building Standards Code.-Each building shall provide a minimum of two shower and changing facilities for employees.</p> <p>i) Each building shall provide preferred and designated parking for any combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles equivalent to the number identified in California Green Building Standards Code Section 5.106.5.2 or the Moreno Valley Municipal Code whichever requires the higher number of carpool/vanpool stalls.</p> <p>j) The following information shall be provided to tenants: onsite electric vehicle charging locations and instructions, bicycle parking, shower facilities, transit availability and the schedules, telecommunicating benefits, alternative work schedule benefits, and energy efficiency.</p>	Significant and Unavoidable
Impact 4.3.6.5 Impacts to Sensitive Receptors		
The construction and operation of the project would result in the emissions of several toxic air contaminants, the most ubiquitous being diesel particulate matter (diesel PM). The projects estimated cancer risk for sensitive receptors onsite would exceed the maximum cancer risk thresholds.	Implementation of the previously identified Mitigation Measures 4.1.6.1A, 4.3.6.2A through 4.3.6.2D, and 4.3.6.3A through 4.3.6.3E will help reduce short- and long-term project emissions and health risks to sensitive receptors, but not to less than significant levels.	Significant and Unavoidable
Cumulative Air Quality Impacts		
The project will increase short-term local and long-term regional air pollutant	Implementation of the previously identified Mitigation Measures 4.3.6.2A through 4.3.6.2D, 4.3.6.3A through 4.3.6.3E, and 4.3.6.4A will help reduce short- and long-term project emissions	Significant and Unavoidable

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emissions and chronic health risks.	and health risks, but not to less than significant levels.	
4.4 Biological Resources		
LESS THAN SIGNIFICANT IMPACTS		
Adopted Policies and/or Ordinances		
There are no local policies or ordinances regarding the protection of biological resources.	No mitigation required	No Impact
Habitat Fragmentation/Wildlife Movement		
The project will not restrict the movement of wildlife to and from the Badlands and the SJWA/Mystic Lake area, and will protect Drainage 9 through the project area as a natural drainage channel.	No mitigation required	Less than Significant
SIGNIFICANT IMPACTS		
Impact 4.4.6.1 Endangered and Threatened Species		
There are 17 plant and animal species designated as endangered or threatened by state and/or federal authorizes that have the potential to occur within the general vicinity of the WLC project area. Development will remove agricultural land which provides minimal habitat value for most species present.	<p>4.4.6.1A All Plot Plan applications within Planning Areas 10 and 12 (i.e. adjacent to the San Jacinto Wildlife Area as shown in Final EIR Volume 2 Figure 4.1.6B) shall provide a 250-foot setback from the southerly property line. Permitted uses within this setback area include landscaping, drainage and water quality facilities, fences and walls, utilities and utility structures, maintenance access drives, and similar related uses. No logistics buildings or truck access/parking/maneuvering facilities are permitted in this setback area.</p> <p>In addition, logistics buildings within Planning Areas 10 and 12 may not be located within 400 feet of the southerly property line. All development proposals in Planning Areas 10 and 12 shall include a minimum six-foot tall chain link fence or similar barrier to separate warehouse activity from the setback area. This fence/barrier shall have metal mesh installed below and above ground level to prevent animals from moving between the development area and the setback area.</p> <p>Within Planning Areas 10 and 12, all truck activity areas adjacent to the 250-foot buffer area along the southern property line shall be enclosed by minimum 11-foot tall solid walls to reduce noise and lighting impacts on the adjacent property. This measure shall be implemented to the satisfaction of the Planning Official.</p>	Less than Significant

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	<p>A preliminary landscape plan for the 250-foot setback area shall be submitted with all Plot Plan applications for lots adjacent to the California Department of Fish and Wildlife property. Precise landscape plans shall be submitted with any grading permit for said lots and must be approved prior to the issuance of any building permit on said lots. The landscape plan shall be prepared by a licensed landscape architect in consultation with a qualified biologist and shall be consistent with the design standards contained in the World Logistics Center Specific Plan. No plant species listed in Section 6.1.4 of the Western Riverside County Multiple Species Habitat Conservation Plan shall be installed within the setback area. Cottonwood trees shall be planted within the setback area consistent with the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development Division Manager.</p> <p>4.4.6.1B</p> <p>Each Plot Plan application in Planning Areas 10 and 12 shall provide runoff management and water quality facilities adequate to minimize downstream erosion, maintain water quality standards and retain pre-development flows in a manner meeting the approval of the City Engineer. All drainage improvements shall be designed to minimize runoff and erosional impacts on adjacent property. This measure shall be implemented to the satisfaction of the Land Development Division Manager of Public Works.</p>	
<p>Impact 4.4.6.2 Adopted Habitat Conservation Plans</p> <p>The project site is subject to the provisions of SKR HCCP and the MSHCP.</p> <p>4.4.6.2A</p> <p>Each Plot Plan application shall include a focused plant survey of the proposed development site prepared by a qualified biologist to identify if any of the following sensitive plants (i.e., Coulter's goldfields, smooth tarplant, Plummer's' mariposa lily, or thread-leaved brodiaea) are present. If any of the listed plants are found, they may be relocated to the 250-foot setback area outlined in the Specific Plan and discussed in Mitigation Measure 4.4.6.1A. Alternatively, at the applicant's discretion, an impact fee may be paid to the Western Riverside County Regional Conservation Authority (RCA) or other appropriate conservation organizations to offset for the loss of these species. This measure shall be implemented to the satisfaction of the Planning Official.</p> <p>4.4.6.2B</p> <p>Prior to the approval of any tentative maps for development including or adjacent to any Criteria Cells identified in the Western Riverside County Multiple Species Habitat Conservation Plan, the applicant shall prepare and process a Joint Project Review (JPR) with the Riverside County Resource Conservation Agency (RCA). All criteria cells shall be identified on all such tentative maps. This measure shall be implemented to the satisfaction of the City Planning Division and Riverside County</p>		Less than Significant

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<p>Impact 4.4.6.3 Jurisdictional Delineation, Riparian Habitat or Other Sensitive Natural Communities</p> <p>Drainage Features 7, 8, 9, 12, and 15 within the project area are considered riparian/riverine areas.</p>	<p>Resource Conservation Agency (“RCA”).</p> <p>4.4.6.3A Prior to the issuance of grading permits the applicant shall secure a jurisdictional determination from the United States Army Corps of Engineers (USACE) and confirm with the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) if drainage features mapped on the property to be developed are subject to jurisdictional authority. If the features are subject to regulatory protection, the applicant will secure permit approvals with the appropriate agencies prior to initiation of construction. Compensatory riparian habitat mitigation will be provided at a minimum ratio of 1:1 (replacement riparian habitat to impacted riparian habitat) to ensure no net loss of riparian habitat or aquatic resources. It should be noted that this is a minimum recommended ratio but the actual permitting ratio may be higher. These detention basins will be oversized to accommodate the provision of areas of riparian habitat. Maintenance of the basins will be limited to that necessary to ensure their drainage and water quality functions while encouraging habitat growth. Riparian habitat mitigation will be provided concurrent to or prior to impacts. A Compensatory Mitigation Plan will be prepared for all unavoidable impacts and will be consistent with the United States Army Corps of Engineers (USACE)/United States Environmental Protection Agency’s Compensatory Mitigation for Losses of Aquatic Resources; Final Rule and the United States Army Corps of Engineers Standard Operating Procedure for Determination of Mitigation Ratios.</p> <p>The applicant shall consult with United States Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board to establish the need for permits based on the results of a recent jurisdictional delineation and final design plans for each of the proposed facilities. Consultation with the three agencies shall take place and appropriate permits obtained for project-level development. Compensation for losses associated with the altering of drainages on site shall be in agreement with the permit conditions and in coordination with compensation outlined below.</p> <p>Mitigation will consist of onsite creation, offsite creation, or purchase of mitigation credits from an approved mitigation bank. As outlined in the WLC programmatic DBESP report, onsite riparian habitat will be created at a minimum 1:1 ratio due to the poor quality of onsite habitat. New habitat will be created within the onsite detention/infiltration basins to the extent allowed by the resource agencies to reduce storm flows, improve water quality, and reduce sediment transport. Habitat creation will include the installation of mule fat scrub or similar riparian scrub habitat to</p>	<p>Less than Significant</p>

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	<p>promote higher quality riparian habitat, but still maintain the basins for their primary role as detention facilities. The use of these areas as conservation areas would require consent from CDFW and the City of Moreno Valley (MM BIO-2b and MM DBESP 1 through 3).</p> <p>4.4.6.3B As required by the Resource Conservation Agency (RCA), a program-level Determination of a Biological Equivalent or Superior Preservation (DBESP) for impacts to Riverine/Riparian habitat has been prepared and shall be approved by the Resource Conservation Agency prior to project approval. The Determination of a Biological Equivalent or Superior Preservation includes a general discussion of mitigation options for impacts to riverine/riparian areas as well as general location and size of the mitigation area and includes a monitoring program.</p> <p>If impacts to riparian habitat within the World Logistics Center Specific Plan (WLCSP) cannot be avoided at the time of specific development, then a separate project-level Determination of Biologically Equivalent or Superior Preservation (DBESP) shall be prepared to identify project-specific impacts to riparian habitat and incorporate mitigation options identified in Mitigation Measure 4.4.6.3A.</p> <p>A project-level Determination of a Biological Equivalent or Superior Preservation for each specific development shall be prepared to document measures to reduce impacts to riparian/riverine habitats in accordance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The project-level Determination of a Biological Equivalent or Superior Preservation shall include specific measures to reduce impacts to riparian areas and provide mitigation in the form of on-site preservation of riparian areas and/or a combination of compensation through purchase and placement of lands with riparian/riverine habitat into permanent conservation through a conservation easement and/or restoration or enhancement efforts at offsite or onsite locations. Therefore, mitigation required for compensation for impacts to riparian/ riverine areas will require a minimum of 1:1 mitigation ratio of riparian/riverine mitigation land.</p> <p>As outlined in the WLC programmatic DBESP, erosion control improvements will be installed within Drainage 9 to reduce sediment transport, and additional riparian habitat will be enhanced within this drainage following the installation of the erosion control improvements (MM DBESP 4 and 5).</p> <p>4.4.6.3C Prior to issuance of any grading permit for any offsite improvements that support development within the World Logistics Center Specific Plan, the developer shall retain a qualified biologist to prepare a jurisdictional delineation (JD) for any drainage</p>	

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	<p>channels affected by construction of the offsite improvements. This jurisdictional delineation shall be submitted to the U.S. Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW) for review and concurrence. If the offsite improvements will not affect any identified jurisdictional areas, no United States Army Corps of Engineers permitting is required. However, permitting through the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (i.e., Streambed Alteration Agreement) may still be required for these improvements. The applicant shall consult with United States Army Corps of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board to establish the need for permits based on the results of the 2012 jurisdictional delineation and final design plans for each of the proposed facilities. Consultation with the three agencies shall take place and appropriate permits obtained. Compensation for losses associated with any altered offsite drainages shall be in agreement with the permit conditions. Any landscaping associated with these offsite improvements shall use only native species to help protect biological resources residing within or traveling through these drainages per Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Table 6.1.2. This measure shall be implemented to the satisfaction of the City Planning Division in consultation with the U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, and the California Department of Fish and Wildlife.</p>	
<p>Impact 4.4.6.4 Candidate, Non-listed Sensitive, or Special-Status Species</p> <p>The project area contains suitable habitat for sensitive species, including a variety of nesting birds, including burrowing owl, and Los Angeles pocket mouse.</p>	<p>4.4.6.4A</p> <p>Pursuant to the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFG), site preparation activities (removal of trees and vegetation) shall be avoided during the nesting season of potentially occurring native and migratory bird species (generally February 1 to August 31). If site preparation activities must occur during the nesting season, a pre-activity field survey shall be conducted by a qualified biologist prior to issuance of grading permits for such development. The survey shall determine if active nests of species protected by the Migratory Bird Treaty Act or California Fish and Game Code are present in the construction zone. If active nests of these species are found, the developer shall establish an appropriate buffer zone with no grading or heavy equipment activity within of 500 feet from an active listed species or raptor nest, 300 feet from other sensitive or protected bird nests (non-listed), 250 feet from passerine birds, or 100 feet for sensitive or protected songbird nests. All construction activity within the vicinity of active nests must be conducted in the presence of a qualified biological monitor. Construction activity may encroach into the buffer area at the discretion of the biological monitor in consultation with CDFW. In the event no special status avian species are identified</p>	<p>Less than Significant</p>

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	<p>within the limits of disturbance, no further mitigation is required. In the event such species are identified within the limits of ground disturbance, mitigation measure 4.4.6.4B shall also apply. This measure shall be implemented to the satisfaction of the City Planning Division.</p> <p>4.4.6.4B If it is determined that project-related grading or construction will affect nesting migratory bird species, no grading or heavy equipment activity shall take place within the limits established in Mitigation Measure 4.4.6.4A until it has been determined by a qualified biologist that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow. This measure shall be implemented to the satisfaction of the City Planning Division.</p> <p>4.4.6.4C The loss of foraging habitat for golden eagle and white-tailed kite will be mitigated by payment of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) fee and the creation of a landscaped buffer area adjacent to the San Jacinto Wildlife Area property (SJWA). First, the payment of the Western Riverside County Multiple Species Habitat Conservation Plan fee will be required on a project-by-project basis. Second, a 250-foot setback as described in Mitigation Measure 4.4.6.1A will be established within the World Logistics Center Specific Plan area. This area will reduce impacts to raptor species foraging in the adjacent San Jacinto Wildlife Area open space areas.</p> <p>Burrowing Owl</p> <p>4.4.6.4DA pre-construction clearance survey for burrowing owl shall be conducted by a qualified biologist no more than thirty (30) days prior to any grading or ground disturbing activities within the project area.</p> <p>In the event no burrowing owls are observed within the limits of ground disturbance, no further mitigation is required.</p> <p>If construction is to be initiated during the breeding season (February 1 through August 31) and burrowing owl is determined to occupy any portion of the disturbance area during the 30-day pre-construction survey, construction activity shall maintain a 500-foot buffer area around any active nest/burrow until it has been determined that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow. If this avoidance buffer cannot be maintained, consultation with the California Department of Fish and Wildlife (CDFW) shall take place and an appropriate avoidance distance established. No disturbance to active burrows shall occur without appropriate permitting through the Migratory Bird Treaty Act and/or California</p>	

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	<p>Department of Fish and Wildlife.</p> <p>If active burrowing owl burrows are detected outside the breeding season (September through January), or within the breeding season but owls are not nesting or in the process of nesting, active and/or passive relocation may be conducted following consultation with the California Department of Fish and Wildlife. A relocation plan may be required by California Department of Fish and Wildlife if active and/or passive relocation is necessary. The relocation plan will outline the basic process and provides options for avoidance and mitigation. Artificial burrows - may be constructed within the buffer area south of the World Logistics Center Specific Plan. Construction activity may occur within 500 feet of the burrows at the discretion of the biological monitor in consultation with CDFW.</p> <p>A relocation plan may be required by California Department of Fish and Wildlife if active or passive relocation is necessary. Artificial burrows may be constructed within appropriate burrowing owl habitat within the proposed open space/conservation area (Planning Area 30), a 74.3-acre area in the southwest portion of the Specific Plan. This area abuts the Lake Perris State Recreation Area (LPSRA) which is already in conservation. If suitable habitat is not present in Planning Area 30, owls may be relocated to the SJWA, the 250-foot buffer area or other suitable on-site or off-site areas. Construction activity may occur within 500 feet of the burrows at the discretion of the biological monitor.</p> <p>Los Angeles Pocket Mouse</p> <p>4.4.6.4E Prior to the approval of any Plot Plans proposing the development of land including or adjacent to Drainage 9, a protocol survey for the Los Angeles Pocket Mouse (LAPM), including 100 feet upstream and downstream of the affected reach shall be prepared by a qualified biologist and submitted to the City. If the affected drainage is not occupied, the area is considered not to be occupied and development can continue without further action. If the species is found within the specific survey area, no development shall occur until an appropriate mitigation fee is paid or appropriate amount of land set aside on the project site or off site to compensate for any loss of occupied Los Angeles Pocket Mouse habitat. Alternatively, individuals may be relocated to the 250-foot setback zone along the southern boundary of the property identified in Mitigation Measure 4.4.6.1A, or other appropriate areas as determined by the United States Fish and Wildlife Service. If necessary, this measure shall also be coordinated with Mitigation Measure 4.4.6.2B regarding preparation and processing of a Determination of a Biological Equivalent or Superior Preservation report. This measure shall be implemented to the satisfaction of the City Planning</p>	

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	<p>Division.</p> <p>Resource Management</p> <p>4.4.6.4F Prior to approval of any discretionary permits for development within Planning Areas 10 and 12, a Biological Resource Management Plan (BRMP) shall be prepared to prescribe how the 250-foot setback area outlined in Mitigation Measure 4.4.6.1A will be developed and maintained. This plan will identify frequent and infrequent vegetation management requirements (i.e., removal of invasive plants) and the planting and maintaining trees to provide roosting and nesting opportunities for raptors and other birds. The Biological Resource Management Plan will also describe how relocation of listed or sensitive species will occur from other locations as outlined in Mitigation Measures 4.4.6.2A, 4.4.6.4D, and 4.4.6.4E.</p> <p>The Biological Resource Management Plan shall be reviewed and approved by the Planning Official in consultation with the San Jacinto Wildlife Area Manager. The Biological Resource Management Plan shall cover all the land within the 250-foot setback zone within Planning Areas 10 and 12. Implementation of the plan shall be supervised by a qualified biologist, to the satisfaction of the City Planning Division.</p> <p>4.4.6.4G Mitigation Measure 4.4.6.1A specifies that a landscape plan shall be submitted with any development proposal for lots adjacent to the California Department of Fish and Wildlife (CDFW) San Jacinto Wildlife Area (SJWA) property prior to issuance of a precise grading permit. The landscape plan shall be prepared by a licensed landscape architect in consultation with a qualified biologist and shall be consistent with the design standards contained in the Specific Plan. No plant species listed in Section 6.1.4 or Table 6.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) shall be installed within the setback area. In conjunction with development adjacent to the San Jacinto Wildlife Area (SJWA), cottonwood trees shall be planted within the 250-foot setback area, consistent with the World Logistics Center Specific Plan plant palette (per DBESP MM 8).</p> <p>During construction, the runoff leaving construction areas will be directed to onsite detention basins and away from downstream drainage features located offsite. All projects within the WLCSP will be required to prepare a Storm Water Pollution Prevention Plan (as outlined in MM 4.9.6.2B). Regarding the 250-foot setback area, pedestrian and vehicular access to areas of riparian/riverine habitat will be prohibited except for controlled maintenance access. Finally, no grading shall be permitted within conserved riparian/riverine habitat areas except for grading necessary to established or enhance habitat areas (DBESP MM 6, 7, 9, and 10).</p>	

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	<p>4.4.6.4H As outlined in Mitigation Measure 4.4.6.1A, development adjacent to the 250-foot open space setback shall have a six-foot chain link fence or similar barrier to help separate human activity and the buffer area. Any chain link fencing installed on any properties adjacent to the 250-foot buffer area shall have metal mesh installed below and above ground level to prevent animals from accessing new development areas.</p> <p>4.4.6.4I The individual property owner and/or Property Owners Association (POA) as appropriate shall be responsible for maintaining the various onsite landscaped areas, open improved or natural drainage channels, and detention or flood control basins in a manner that provide for fuel management and vector control pursuant to standards maintained by the City Fire Marshall and County Department of Environmental Health- Vector Control Group. This measure requires the individual owner or Property Owners Association (POA) to manage vegetation in and around these areas or improvements so as to not represent a fire hazard as defined by the City Fire Department through the substantial buildup of combustible materials. This measure also requires the individual owner or Property Owners Association to manage vegetation and standing water in drainage channels and basins such that they do not encourage or allow vectors to occur (primarily rats and mosquitoes). Runoff shall not be allowed to stand in channels or basins for more than 72 hours without treatment or maintenance to prevent establishment of mosquitoes per published County vector control guidelines and "Best Management Practices for Mosquito Control on California State Properties" which is available from the California West Nile Virus website at http://www.westnile.ca.gov/resources. This measure shall be implemented by the Property Owners Association in consultation with the City Fire Department and Riverside County Department of Environmental Health – Vector Control Group.</p> <p>4.4.6.4J A Fuel Management Plan shall be prepared on a project-by-project basis for those Planning Areas adjacent to the south and east boundary of the World Logistics Center Specific Plan adjacent to Western Riverside County Multiple Species Habitat Conservation Plan Conservation Areas. The Fuel Management Plan shall be prepared by the project proponent and submitted for approval to the prior to plot plan approval for those projects on the southern and eastern Western Riverside County Multiple Species Habitat Conservation Plan boundary. Per the Western Riverside County Multiple Species Habitat Conservation Plan guidelines, the Fuel Management Plan shall include the following:</p> <ul style="list-style-type: none"> • A plant palette of adequate plant species that may be planted within the Fuel Management Area, which will be approved by a biologist familiar with the plant 	

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	<p>requirements of the area.</p> <ul style="list-style-type: none"> • A list of non-native invasive plants that are prohibited from installation. • Maintenance activities and a maintenance schedule. <p>Fuel modification zones shall be mapped and include an impact assessment as required under California Environmental Quality Act guidelines for a project-level analysis. The plan shall demonstrate that the adjacent Western Riverside County Multiple Species Habitat Conservation Plan Areas are adequately protected from expected fire risks.</p> <p>4.4.6.4K Prior to approval of any plot plans for development adjacent to the SJWA, the applicant shall demonstrate that direct light rays have been contained within the development area, per requirements of the MSHCP Section 6.0 which states, “Night lighting shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting.” This measure shall be implemented to the satisfaction of the City Planning Division.</p>	
Cumulative Biological Impacts		
With implementation of the stated project-specific mitigation and payment of required MSHCP fees, no significant cumulative effect on biological resources would result from development of the WLC project.	Previously referenced Mitigation Measures 4.4.6.1A through 4.4.6.1C, 4.4.6.2A and 4.4.6.2B, 4.4.6.3A and 4.4.6.3B, and 4.4.6.4A through 4.4.6.4K.	Less than Significant
4.5 Cultural Resources		
LESS THAN SIGNIFICANT IMPACTS		
Human Remains		
There is no evidence that the site has been utilized for human burials, and there is state law dealing with human remains that are found during grading or excavation.	No mitigation required.	Less than Significant

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SIGNIFICANT IMPACTS		
Impact 4.5.6.1 Archaeological Resources		
<p>Most of the site has been previously surveyed, and previously identified resources have been surveyed and retrieved according to required protocols. Nine on-site rural residential properties (designated "Light Logistics") have not been previously surveyed and would need to be surveyed prior to development.</p> <p>The City has conducted SB 18 Consultation with local Native American tribes and the Pechanga and Soboba tribes have expressed a desire to consult.</p>	<p>4.5.6.1A</p> <p>Prior to the approval of any grading permit for any of the "Light Logistics" parcels, the parcels shall be evaluated for significance by a qualified archaeologist. A Phase 1 Cultural Resources Assessment shall be conducted by the project archaeologist and an appropriate tribal representative(s) on each of the "Light Logistics" parcel to determine if significant archaeological or historical resources are present.</p> <p>A Phase 2 significance evaluation shall be completed for any of these sites in order to determine if they contain significant archaeological or historical resources. Cultural resources include but are not limited to stone artifacts, bone, wood, shell, or features, including hearths, structural remains, or historic dumpsites. All resources determined to be prehistoric or historic shall be documented using DPR523 forms for archival research/storage in the Eastern Information Center (EIC). If the particular resource is determined to be not significant, no further documentation is required. If prehistoric resources are determined to be significant, they shall be considered for relocation or archival documentation. If any resource is determined to be significant, a Phase 3 recovery study shall be conducted to recover remaining significant cultural artifacts. If prehistoric archaeological/cultural resources are discovered during the Phase 1 survey and it is determined that they cannot be avoided through site design, they shall be subject to a Phase 2 testing program. The project archaeologist in consultation with appropriate tribal group(s) shall determine the significance of the resource(s) and determine the most appropriate disposition of the resource(s) in accordance with applicable laws, regulations and professional practices (per Cultural Report MM CR-1, MM CR-2, MM CR-7 Table 3, pg. 74).</p>	<p>Less than Significant with Mitigation</p>
	<p>4.5.6.1B</p> <p>Prior to the issuance of any grading or ground-disturbing permit for construction of off-site improvements a qualified archaeologist shall be retained to prepare a Phase I cultural resource assessment (CRA) of the project site if an up to date Phase I cultural resource assessment is not available for the site at the time of development per Cultural Report MM CR-5, Table 3, pg. 74).</p> <p>Appropriate tribal representatives as identified by the City shall be invited by the Project Archeologist to participate in this assessment.</p> <p>If archaeological resources are discovered during construction activities, no further excavation or disturbance of the area where the resources were found shall occur until a qualified archaeologist evaluates the find. If the find is determined to be a unique archaeological resource, appropriate action shall be taken to (a) plan</p>	

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	<p>construction to avoid the archeological sites (the preferred alternative); (b) cap or cover archeological sites with a layer of soil before building on the affected project location; or (c) excavate the site to adequately recover the scientifically consequential information from and about the resource. At the discretion of the project archaeologist, work may continue on other parts of the project site while the unique archaeological resource mitigation takes place. This measure shall be implemented to the satisfaction of the Planning Official.</p> <p>If the project archaeologist, in consultation with the monitoring Tribe(s), determines that the find is a unique archaeological resource, the resource site shall be evaluated and recorded in accordance with requirements of the State Office of Historic Preservation (OHP). If the resource is determined to be significant, data shall be collected by the qualified archaeologist and the findings of the report shall be submitted to the City. If the find is determined to be not significant no mitigation is necessary.</p> <p>Should a future project-level analysis show that cultural resource site CA-RIV-3346 will be directly or partially impacted by project-level construction, an Addendum cultural resource report must be prepared and include an analysis of the alternatives associated with mitigation for impacts to this resource following CEQA Guidelines Section 15126.4(b)(3). This information must be included in any project-level CEQA compliance documentation. It should be noted that Phase 3 data recovery is an acceptable mitigation action under CEQA Guidelines Section 15126.4(b)(3)(C) (per Cultural Report MM CR-3, Table 3, pg. 74).</p> <p>Should it be determined through a future project-level EIR analysis that prehistoric cultural resource sites CA-RIV-2993 and/or CA-RIV-3347 shall be directly impacted by future construction, these sites must be Phase 2 tested for significance (per Cultural Report MM CR-4, Table 3, pg. 74).</p> <p>4.5.6.1C</p> <p>Prior to the issuance of any grading permits a qualified archaeologist shall be retained to monitor all grading and shall invite tribal groups to participate in the monitoring. Project-related archaeological monitoring shall include the following requirements per Cultural Report MM CR-6, MM CR-8, Table 3, pg. 74):</p> <ol style="list-style-type: none"> 1. All earthmoving shall be monitored to a depth of ten (10) feet below grade by the Project Archaeologist or his/her designated representative. Once all areas of the development project that have been cut to 10 feet below existing grade have been inspected by the monitor, the Project Archaeologist may, at his or her discretion, terminate monitoring if and only if no buried cultural resources have 	

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	<p>been detected;</p> <ol style="list-style-type: none"> 2. If buried cultural resources are detected, monitoring shall continue until 100 percent of virgin earth within the specific project area has been disturbed and inspected by the Project Archaeologist or his/her designated representative. 3. Grading shall cease in the area of a cultural artifact or potential cultural artifact as delineated by the Project Archaeologist or his/her designated representative. A buffer of at a minimum 25 feet around the cultural item shall be established to allow for assessment of the resource. Grading may continue in other areas of the site while the particular find are investigated; and 4. If prehistoric cultural resources are uncovered during grading, they shall be Phase 2 tested by the Project Archaeologist, and evaluated for significance in accordance with §15064.5(f) of the CEQA Guidelines. Appropriate actions for significant resources as determined by the Phase 2 testing include but are not limited to avoidance or capping, incorporation of the site in green space, parks, or delineation into open space. If such measures are not feasible, Phase 3 data recovery of the significant resource will be required, and curation of recovered artifacts and/or reburial, shall be required. A report associated with Phase 2 testing or Phase 3 data recovery must be delivered to the City and, if necessary, the museum where any recovered artifacts have been curated. 5. No further grading shall occur in the area of the discovery until the City approves specific actions to protect identified resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the City where they would be afforded long-term preservation to allow future scientific study. 6. The developer shall make reasonable efforts to avoid, minimize, or mitigate significant adverse impacts on cultural resources. The State Historic Preservation Office (SHPO) and local Native American tribes will be consulted and the Advisory Council on Historic Preservation will be notified within 48 hours of the find in compliance with 36 CFR 800.13(b)(3). This measure shall be implemented to the satisfaction of the Planning Official. <p>4.5.6.1D Prior to the issuance of any grading permit the project archaeologist shall invite interested Tribal Group(s) representatives to monitor grading activities. Qualified representatives of the Tribal Group(s) shall be granted access to the project site to monitor grading as long as they provide 48-hour notice to the developer of their desire to monitor, so the developer can make appropriate safety arrangements on</p>	

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<p>4.5.6.1E</p> <p>It is possible that ground-disturbing activities during construction may uncover previously unknown, buried cultural resources (archaeological or historical). In the event that buried cultural resources are discovered during grading and no Project Archaeologist or Historian is present, grading operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be retained to determine the most appropriate course of action regarding the resource. The Archaeologist shall make recommendations to the City on the actions that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with §15064.5 of the <i>CEQA Guidelines</i>. Cultural resources could consist of, but are not limited to, stone artifacts, bone, wood, shell, or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of CEQA criteria. If the resources are determined to be unique historic resources as defined under §15064.5 of the <i>CEQA Guidelines</i>, appropriate protective actions for significant resources such as avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds shall be implemented by the project archaeologist and the City.</p>	<p>the site. This measure shall be implemented to the satisfaction of the Planning Official.</p> <p>No further grading shall occur in the area of the discovery until the City and project archaeologist approve the measures to address these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the City where they would be afforded long-term preservation to allow future scientific study.</p>	<p>Less than Significant with Mitigation</p>
<p>Impact 4.5.6.2 Historic Resources</p> <p>Seven on-site rural residential properties (designated "Light Logistics") have not been previously surveyed for historical resources, and would need to be surveyed prior to development.</p> <p>Juan Bautista de Anza crossed the southern portion of the site while exploring California in 1774.</p>	<p>4.5.6.2A</p> <p>If any historic resources are found during implementation of Mitigation Measure 4.5.6.1A, the Project Archaeologist or Historian (as appropriate) shall offer any artifacts or resources to the Moreno Valley Historical Society (MVHS) or the Eastern Information Center/County Museum or the Western Science Center in Hemet as appropriate for archival storage. From the time any artifacts are turned over to the Moreno Valley Historical Society or other appropriate historical group, the developer shall have no further responsibility for their management or maintenance.</p> <p>In addition, the following measure is proposed to acknowledge the route of Juan Bautista de Anza</p>	<p>Less than Significant with Mitigation</p>

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	<p>through the project area as an important historical event:</p> <p>4.5.6.2B As part of construction of the trail segment connecting Redlands Boulevard to the California Department of Fish and Wildlife property, the developer shall contribute \$5,000 to the City for the installation of a historical marker acknowledging the passing of Juan Bautista de Anza through this area during his exploration of California. This measure shall be incorporated into trail plans for this segment which will be subject to review and approval by the City Park and Recreation Department in consultation with the Moreno Valley Historical Society.</p> <p>4.5.6.2C Streets C and E shall follow the historical alignment of Alessandro Boulevard and shall be named Alessandro Boulevard.</p>	
<p>Impact 4.5.6.3 Paleontological Resources</p> <p>The project area is considered moderately sensitive regarding paleontological resources, and fossiliferous materials have been found in the surrounding region in the past.</p>	<p>4.5.6.3A Prior to the issuance of any grading permits, a City-approved Paleontologist shall be retained to conduct paleontological monitoring as needed for all grading related to development. Development monitoring shall include the following actions:</p> <ol style="list-style-type: none"> 1. Monitoring must occur in areas where excavations are expected to exceed twenty (20) feet in depth, in areas where fossil-bearing formations are found during grading, and in all areas found to contain, or are suspected of containing, fossil-bearing formations. 2. To avoid construction delays, paleontological monitors shall be equipped to salvage fossils and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates if they are unearthed. 3. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of specimens. 4. Monitoring may be reduced if the potentially fossiliferous units described herein are not present, or, if present, are determined upon exposure and examination by the Project Paleontologist to have low potential to contain fossil resources. This measure shall be implemented to the satisfaction of the Planning Official. The Project Paleontologist and the Project Archaeologist described in Mitigation Measure 4.5.6.1C may be the same person if he/she meets the qualifications of both positions per Cultural Report MM PR-1, Table 4, pg. 76). <p>4.5.6.3B Prior to the issuance of any permits for the construction of off-site improvements, a qualified paleontologist shall conduct an assessment for paleontological resources on each off-site improvement location. If any site is determined to have a potential for</p>	<p>Less than Significant with Mitigation</p>

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	<p>exposing paleontological resources, the project paleontologist shall monitor off-site grading/excavation, subject to coordination with the City. Development monitoring shall include the following mitigation measures:</p> <ol style="list-style-type: none"> 1. Monitoring must occur in areas where excavations are expected to reach fossil-bearing formations during grading. This monitoring must be conducted by the Project Paleontologist in all areas found to or suspected of containing fossil-bearing formations. 2. To avoid construction delays, the Project Paleontologist shall be equipped to salvage fossils and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates as they are unearthed. 3. The Project Paleontologist shall be empowered to temporarily halt or divert equipment to allow removal of specimens. 4. Monitoring may be reduced if the potentially fossiliferous units described herein are not present, or, if present, are determined upon exposure and examination by the Project Paleontologist to have low potential to contain fossil resources. 	
Cumulative Cultural Impacts		
<p>The project site and surrounding area, especially the uplands associated with Mt. Russell, have yielded cultural resources in the past. As this area develops, there is a potential for impacts to or loss of archaeological, historical, or paleontological resources.</p>	<p>Previously referenced Mitigation Measures 4.5.6.1A through 4.5.6.1E, 4.5.6.2A and 4.5.6.2B, and 4.5.6.3A and 4.4.6.3B.</p>	<p>Less than Significant</p>
4.6 Geology and Soils		
LESS THAN SIGNIFICANT IMPACTS		
Landslides or Rockfalls		
<p>A large older landslide has been mapped primarily off site on the north easterly flanks of Mount Russell, near the southwest portion of the property. The Specific Plan designates 74.3 acres in the southwest corner of the site as open space.</p>	<p>No development will occur in the potential landslide zone, so no mitigation is needed.</p>	<p>Less than Significant</p>

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Soil Erosion or Loss of Topsoil		
On-site soils have a slight erosion hazard, and uncontrolled runoff could result in erosion or loss of topsoil.	The project would be required to adhere to the City's Grading Ordinance, obtain an NPDES Permit, prepare an SWPPP and a WQMP, construction and operational impacts associated with soil erosion hazards are considered to be less than significant, and no mitigation is required.	Less than Significant
Septic Tanks		
The project would not involve the installation of septic tanks or alternative wastewater disposal systems, no impacts would occur.	No mitigation is required.	No Impact
Seismic-Related Ground Failure		
The City's General Plan and project geotechnical report indicates the site has little or no potential for seismically-induced failure or liquefaction.	No mitigation is required.	Less than Significant
SIGNIFICANT IMPACTS		
Impact 4.6.6.1 Fault Rupture		
The eastern portion of the site contains one or more splays of the San Jacinto Fault, and the Casa Loma Fault may be in the general vicinity of the western portion of the site.	Prior to approval of any projects for development between Redlands Boulevard and Theodore Street, south of Dracaea Avenue (projected east from Redlands Boulevard), and the area south of Alessandro from the western boundary along the Mount Russell toe of slope easterly into the site 1,500 feet, the City shall determine if a detailed fault study of the Casa Loma Fault Zone area is required based on available evidence. If necessary, any additional geotechnical investigations shall be prepared by a qualified geologist and determine if structural setbacks are needed, and shall identify specific remedial earthwork and/or foundation recommendations. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and	Less than Significant with Mitigation

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	<p>approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Structures intended for human occupancy shall not be located within any structural setback zone as determined by those studies. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.</p> <p>4.6.6.1B Prior to approval of any projects for development within or adjacent to the San Jacinto Alquist-Priolo Earthquake Fault Zone, the City shall review and approve a geotechnical fault study prepared by a qualified geologist to confirm the alignment and size of any required building setbacks related to the fault zone. If necessary, this study shall identify a “special foundation or grading remediation zone” for the areas supporting structures intended for human occupancy where coseismic deformation (fractures) is observed. This zone shall be determined after subsurface evaluation based on proposed building locations. Specific remedial earthwork and foundation recommendations shall be evaluated as necessary based on proposed building locations. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.</p> <p>This study may involve trenching to adequately identify the location of the Claremont segment of the San Jacinto Fault Zone that crosses the eastern portion of the World Logistics Center Specific Plan property. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.</p>	

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	<p>4.6.6.1C Prior to the approval of grading permits, or permits for construction of off-site improvements, the City shall review and approve plans confirming that the project has been designed to withstand anticipated ground shaking and other geotechnical and soil constraints (e.g., settlement). The project proponent shall submit plans to the City as appropriate for review and approval prior to issuance of grading permits or issuance of permits for the construction of any offsite improvements. This measure shall be implemented to the satisfaction of the City Engineer.</p>	
<p>Impact 4.6.6.2 Ground Shaking Southern California is located in a seismically active area and will continue to be subject to ground shaking resulting from seismic activity on regional and local faults.</p>	<p>4.6.6.2A Prior to issuance of building permits for any portion of the project site, a site-specific, design level geotechnical investigation for each parcel shall be submitted to the City , which would comply with all applicable state and local code requirements, and includes an analysis of the expected ground motions at the site from known active faults using accepted methodologies. The report shall determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults. The report shall also determine final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.</p>	<p>Less than Significant with <u>Mitigation</u></p>
<p>Impact 4.6.6.3 Unstable Soils On-site soils have a moderate to low shrink-swell potential, and there are some moderately expansive soils on site as</p>	<p>4.6.6.3A Each Plot Plan application for development shall include a site-specific, design level geotechnical investigation for each parcel, in compliance with all applicable state and local code requirements, and including an analysis of the expected soil hazards at</p>	<p>Less than Significant with <u>Mitigation</u></p>

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<p>well.</p>	<p>the site. The report shall determine:</p> <ol style="list-style-type: none"> 1. Structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults. 2. The final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements. <p>Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. These investigations shall identify any site-specific impacts from compressible and expansive soils based on the actual location of individual pads proposed in the future, so that differential movement can be further verified or evaluated in view of the actual foundation plan and imposed fill or structural loads. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.</p> <p>Compliance with this measure will ensure that future buildings are designed to protect the structure and occupants from on-site soil limitations, consistent with State Building Code requirements. This measure shall be implemented to the satisfaction of the City Engineer.</p> <p>4.6.6.3B</p> <p>Any cut slopes in excess of five (5) feet in vertical height shall be constructed as “replacement fill slopes” per the project geotechnical report, due to the variable nature of the onsite alluvial soils. This measure shall be implemented to the satisfaction of the City Land Development Division and the City Engineer in consultation with the Project Geologist.</p>	

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	<p>4.6.6.3C During all grading activities, a geotechnical engineer shall monitor site preparation, removal of unsuitable soils, mapping of all earthwork excavations, approval of imported earth materials, fill placement, foundation installation, and other geotechnical operations. Laboratory testing of subsurface materials to confirm compacted dry density and moisture content, consolidation potential, corrosion potential, expansion potential, and resistance value (R-value) shall be performed prior to and during grading as appropriate. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.</p>	
Cumulative Geology and Soils Impacts		
<p>It is reasonable to conclude that all development within this seismically active area will be required to adhere to applicable State regulations, CBC standards, and the design and siting standards required by local agencies.</p>	<p>Previously referenced Mitigation Measures 4.6.6.1A through 4.6.6.1C, 4.6.6.2A, and 4.6.6.3A through 4.6.6.3C.</p>	Less than Significant
4.7 Greenhouse Gases and Global Climate Change		
LESS THAN SIGNIFICANT IMPACTS		
None	Not applicable	Not applicable
SIGNIFICANT IMPACTS		
Impact 4.7.6.1 Greenhouse Gas Emissions		
<p>The proposed project will emit substantial quantities of greenhouse gases during construction and operation, mainly related to truck emissions, that will exceed recommended SCAQMD thresholds for greenhouse gases. These emissions, while generated by this project, are nonetheless considered cumulative impacts (see below).</p>	<p>The project shall implement the following requirements to reduce solid waste and greenhouse gas emissions from construction and operation of project development:</p> <ul style="list-style-type: none"> a) Prior to January 1, 2020, divert a minimum of 50 percent of landfill waste generated by operation of the project. After January 1, 2020, development shall divert a minimum of 75 percent of landfill waste. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis. b) Prior to January 1, 2020, recycle and/or salvage at least 50 percent of non-hazardous construction and demolition debris. After January 1, 2020, recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste 	Less than Significant

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	<p>diverted on an annual basis.</p> <p>Develop and implement a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or co-mingled. Calculations can be done by weight or volume, but must be consistent throughout.</p> <p>c) The applicant shall submit a Recyclables Collection and Loading Area Plan for construction related materials prior to issuance of a building permit with the Building Division and for operational aspects of the project prior to the issuance of the occupancy permit to the Public Works Department. The plan shall conform to the Riverside County Waste Management Department's Design Guidelines for Recyclable Collection and Loading Areas.</p> <p>d) Prior to issuance of certificate of occupancy, the recyclables collection and loading area shall be constructed in compliance with the Recyclables Collection and Loading Area plan.</p> <p>e) Prior to issuance of certificate of occupancy, documentation shall be provided to the City confirming that recycling is available for each building.</p> <p>f) Within six months after occupancy of a building, the City shall confirm that all tenants have recycling procedures set in place to recycle all items that are recyclable, including but not limited to paper, cardboard, glass, plastics, and metals.</p> <p>g) The property owner shall advise all tenants of the availability of community recycling and composting services.</p> <p>h) Existing onsite street material shall be recycled for new project streets to the extent feasible.</p>	Less than Significant
Impact 4.7.6.2 Greenhouse Gas Plan, Policy, Regulation Consistency		
The proposed project could be potentially inconsistent with established Greenhouse Gas plans, policies, or regulations.	Implementation of previously referenced Mitigation Measures 4.3.6.3B, 4.3.6.4A, 4.3.6.3C, 4.3.6.3D, 4.7.6.1A, 4.16.1.6.1A, 4.16.1.6.1B, 4.16.1.6.1C, 4.16.4.6.1A, 4.16.4.6.1B, and 4.16.4.6.1C will help reduce project-related GHG emissions	Less than Significant
Cumulative Greenhouse Gas Impacts		
The proposed project will emit substantial quantities of greenhouse gases during project operation, mainly related to truck emissions, that will exceed recommended	Project-specific energy conservation, air quality, and greenhouse gas Mitigation Measure 4.7.6.1A will help reduce project greenhouse gas emissions, the project will not make a significant cumulative contribution to greenhouse gas emissions.	Less than Significant

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<p>SCAQMD thresholds for greenhouse gases. These emissions are considered cumulative in terms of global climate change.</p>		
<p>4.8 Hazards and Hazardous Materials</p>		
<p>LESS THAN SIGNIFICANT IMPACTS</p>		
<p>Within Two Miles of a Private Airport, Airport Land Use Plan, or Public Airport</p>		
<p>The nearest airport is 7 miles away so, the development of the WLC project area as proposed would not result in airport safety hazards for people working in the WLC project area.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Existing or Proposed School</p>		
<p>There are no existing planned schools on or within a quarter mile of the project site.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
<p>Routine Transport, Use, or Disposal of Hazardous Materials and Reasonable Foreseeable Upset and Accident Conditions</p>		
<p>The transport, use, handling, or disposal of hazardous materials is regulated by various local, state, and federal standards, ordinances, and regulations that would ensure that potential impacts associated with environmental and health hazards related to an accidental release of hazardous materials are less than significant, and no mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
<p>Compliance with established safety laws and regulations regarding natural gas plants is expected to reduce this potential impact to a less than significant level, and no mitigation is required.</p> <p>Local soils would be extensively disturbed during grading, and would employ relatively stringent dust control measures</p>		

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<p>including regular watering, and revegetation as soon as possible after grading. Under these conditions, it is unlikely that <i>Coccidioides immitis</i> spores ("Valley Fever") would survive in the soil. This potential impact appears minimal and no mitigation is recommended.</p>		
Located on a List of Hazardous Materials Sites		
<p>The project site and surrounding areas are not on any list of the hazardous materials sites as defined by Government Code Section 65962.5. In addition, a number of Phase 1 Environmental Site Assessments (ESAs) prepared for various portions of the site indicate that the site does not contain pesticides or other hazardous materials.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
Conflict with Emergency Response Plans		
<p>Compliance with existing regulations for emergency access and evacuation would ensure that impacts related to this issue are less than significant, and no mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
Wildlands Fire Risk		
<p>The Badlands to the east, across Gilman Springs Road, is considered a Very High Fire Hazard Area. The project allows the construction of warehouse buildings which have a low fire potential, and the project will add a new roadway network to facilitate access for fire protection vehicles and services. Fire Station #58 is relatively close to the project site, but future development will generate a need for an additional fire</p>	<p>The WLC Specific Plan identifies a new on-site fire station, and payment of DIF and increased property taxes will fund future fire services. No other mitigation is required.</p>	<p>Less than Significant</p>

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<p>station on the site. New structures will have to comply with current Fire and Building Code regulations.</p>		
SIGNIFICANT IMPACTS		
On-site Conditions Involving Hazardous Materials		
<p>A number of Phase 1 Environmental Site Assessments (ESAs) prepared for various portions of the site indicate that the site does not contain pesticides or other hazardous materials. However, the existing rural residences on site have not been surveyed as yet for hazardous materials.</p>	<p>4.8.6.1A Prior to demolition of any existing structures on the project site, a qualified contractor shall be retained to determine if asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. If asbestos-containing materials and/or lead-based paint are present, prior to commencement of demolition, these materials shall be removed and transported to an appropriate landfill by a licensed contractor. In addition, onsite soils shall be tested for contamination by agricultural chemicals. If present, these materials shall be removed and transported to an appropriate landfill by a licensed contractor. This measure shall be implemented to the satisfaction of the Building Division including written documentation of the disposal of any asbestos-containing materials, lead-based paint, or agricultural chemical residue in conformance with all applicable regulations.</p> <p>4.8.6.1B Prior to the issuance of any discretionary permits associated with the proposed fueling facility ("logistic support" site in the LD zone), a risk assessment or safety study that identifies the potential public health and safety risks from accidents at the facility (e.g., fire, tank rupture, boiling liquid, or expanding vapor explosion) shall be submitted to the City for review and approval. This study shall be prepared to industry standards and demonstrate that the facility will not create any significant public health or safety impacts or risks, to the satisfaction of the City Building and Safety Division and the Fire Prevention Bureau.</p> <p>4.8.6.1C Prior to grading for any discretionary permits for development in Planning Areas 9-12 adjacent to the natural gas compressor plant, the applicant shall prepare a risk assessment report analyzing safety conditions relative to the existing compressor plant and planned development. The report must be based on appropriate industry standards and identify the potential hazards from the compressor plant (e.g., fire, explosion) and determine that the distance from the plant to the closest planned buildings in Planning Areas 9-12 is sufficient to protect the safety of workers from accidents that could occur (see Final EIR Volume 2 Figure 4.1.6B) at the compressor plant. This measure shall be implemented to the satisfaction of the City Building and</p>	<p>Less than Significant with Mitigation</p>

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<p>4.8.6.1D</p>	<p>Safety Division and the Fire Prevention Bureau.</p> <p>Prior to the issuance of any grading permit, the developer shall inform the City of any existing solid waste materials within the development area. In conjunction with grading activities, all solid waste matter within the development area shall be removed by a licensed contractor and disposed of in an approved landfill. A record of the removal and disposal of any waste materials, in compliance with applicable laws and regulations, shall be submitted to the City prior to the issuance of any building permits.</p>	
<p>Cumulative Hazards and Hazmat Impacts</p> <p>The risk to each future project is based on the location and interface between urbanized area and wildland areas. Potential risks associated with development in this area can be effectively reduced through conformance with Fire and Building Code regulations.</p>		
<p>4.9 Hydrology and Water Quality</p>		
<p>LESS THAN SIGNIFICANT IMPACTS</p>		
<p>Seismic Flooding-Related Impacts</p>		
<p>The WLC project area is not identified as being located within the City's mapped inundation area.</p>	<p>No mitigation required</p>	<p>Less than Significant</p>
<p>Seismic-Related Impacts</p>		
<p>The southwest corner of the site has slopes associated with Mt. Russell, but this area is designated as open space and the rest of the WLC area gently sloping and landslides or mudslides would not occur here.</p>	<p>No mitigation is required</p>	<p>Less than Significant</p>
<p>Groundwater</p>		
<p>The proposed WLC project would not interfere with groundwater recharge as the project site is not identified as a</p>	<p>No mitigation is required</p>	<p>Less than Significant</p>

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groundwater recharge area and it will utilize water supplies from EMWD.		
100-Year Flooding-Related Impacts		
The project site does not lie within a 100-year floodplain and does not include housing, so impacts related to this issue are less than significant.	No mitigation is required	Less than Significant
SIGNIFICANT IMPACTS		
Impact 4.9.6.1 Drainage Pattern and Capacity-Related Impacts		
The project will modify local drainage patterns, increase impervious surfaces (roofs, hardscape, etc.), and add landscaped areas with irrigation.	<p>4.9.6.1A Prior to issuance of any building permit within the Specific Plan area, the developer shall construct storm drain pipes and conveyances, as well as, combined detention and infiltration basin(s), bioretention area(s), and spreading area(s) within each proposed watershed, as outlined in the project hydrology plan, to mitigate the impacts of increased peak flow rate, velocity, flow volume and reduce the time of concentration by storing and infiltrating increased runoff for a limited period of time and release the outflow at a rate that does not exceed the pre-development peak flows and velocities for the 2, 5, 10, 25, and 100-year storms and volumes as assessed in the water balance model for historical conditions. For the purpose of this mitigation measure, the term “construct” shall mean to substantially complete construction so as to function for its intended purpose during construction with complete construction prior to occupancy. Field investigations will be conducted to determine the infiltration rate of soils underlying the proposed locations of bioretention areas and detention basins. The infiltration rate of the underlying soils will be used to properly size the bioretention areas and detention basins/infiltration basins to ensure that adequate volumes of runoff, in cumulative total for all bioretention areas and detention basins, are captured and infiltrated. The water balance model will be updated and rerun for the site-specific conditions encountered to confirm the water balance. This measure shall be implemented to the satisfaction of the City Engineer. Energy dissipaters shall be used as the spillways of basins to reduce the runoff velocity and dissipate the flow energy. Drainage weir structures shall be constructed at the downstream end of the watersheds flowing to the San Jacinto Wildlife Area to control the runoff and spread the flow such that the flows exiting the project boundary will return to the sheet flow pattern similar to the existing condition. Detention basins and spreading areas shall be designed to account for the amount of the sediment transported through the project boundary so that the existing</p>	Less than Significant with Mitigation

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	<p>sediment carrying capacity is maintained.</p> <p>4.9.6.1B The bioretention areas and detention/infiltration basins shall be designed to assure infiltration rates. The monitoring plan will follow the guidelines presented by the California Storm Water Quality Association (CASQA) in the California Storm Water Best Management Program (BMP) Handbook, Municipal, January 2003 Section 4, Treatment Control Best Management Programs Fact Sheets TC-11 Infiltration Basin and TC-30 Vegetated Swale).</p> <p>For the Bioretention areas, as needed maintenance activities shall be conducted to remove accumulated sediment that may obstruct flow through the swale. Bioretention areas shall be monitored at the beginning and end of each wet season to assess any degradation in infiltration rates. The maintenance activities should occur when sediment on channels and culverts builds up to more than 3 inches (CASQA 2003). The swales will need to be cultivated or rototilled if drawdown takes more than 72 hours.</p> <p>For the Detention/infiltration Basins, a 3-5 year maintenance program shall be implemented mainly to keep infiltration rates close to original values since sediment accumulation could reduce original infiltration rate by 25-50%. Infiltration rates in detention basins will be monitored at the beginning and end of each wet season to assess any degradation in infiltration rates. If cumulative infiltration rates of all detention basins drops below the minimum required rates, then the detention basins will be reconditioned to improve infiltration capacity by scraping the bottom of the detention basin, seed or sod to restore groundcover, aerate bottom and dethatch basin bottom (CASQA 2003).</p>	
<p>Impact 4.9.6.2 Construction-Related Water Quality</p> <p>The construction and grading phases of the WLC Specific Plan area would temporarily disturb surface soils and removal of vegetative cover, which could potentially result in erosion and sedimentation within the WLCSP area.</p>	<p>4.9.6.2A Prior to issuance of any grading permit for development in the World Logistics Center Specific Plan, the project developer shall file a Notice of Intent (NOI) with the Santa Ana Regional Water Quality Control Board to be covered under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of storm water associated with construction activities. The project developer shall submit to the City the Waste Discharge Identification Number issued by the State Water Quality Control Board (SWQCB) as proof that the project's Notice of Intent is to be covered by the General Construction Permit has been filed with the State Water Quality Control Board. This measure shall be implemented to the satisfaction of the City Engineer.</p> <p>4.9.6.2B Prior to issuance of any grading permit for development in the World Logistics Center</p>	<p>Less than Significant with Mitigation</p>

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	<p>Specific Plan, the project developer shall submit to the State Water Quality Control Board (SWQCB) a project-specific Storm Water Pollution Prevention Plan (SWPPP). The Storm Water Pollution Prevention Plan shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the Storm Water Pollution Prevention Plan shall emphasize structural and nonstructural best management practices (BMPs) to control sediment and non-visible discharges from the site. Best Management Practices to be implemented may include (but shall not be limited to) the following:</p> <ul style="list-style-type: none"> • Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the Best Management Practices are to be periodically inspected by the Regional Water Quality Control Board during construction, and repairs would be made as required. • Materials that have the potential to contribute non-visible pollutants to storm water must not be placed in drainage ways and must be placed in temporary storage containment areas. • All loose soil, silt, clay, sand, debris, and other earthen material shall be controlled to eliminate discharge from the site. Temporary soil stabilization measures to be considered include: covering disturbed areas with mulch, temporary seeding, soil stabilizing binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Stockpiles shall be surrounded by silt fences and covered with plastic tarps. • The Storm Water Pollution Prevention Plan shall include inspection forms for routine monitoring of the site during the construction phase. • Additional required Best Management Practices and erosion control measures shall be documented in the Storm Water Pollution Prevention Plan. • The Storm Water Pollution Prevention Plan would be kept on site for the duration of project construction and shall be available to the local Regional Water Quality Control Board for inspection at any time. <p>The developer and/or construction contractor for each development area shall be responsible for performing and documenting the application of Best Management Practices identified in the project-specific Storm Water Pollution Prevention Plan.</p>	

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<p>Impact 4.9.6.3 Operational-Related Water Quality</p> <p>During the operational phase of the WLC the major source of pollution in storm water runoff would be contaminants such as, a variety of pollutants such as sediment, petroleum products, commonly utilized construction materials, landscaping chemicals, and (to a lesser extent) trace metals such as zinc, copper, lead, cadmium, and iron that have accumulated on the land surface over which runoff passes. These contaminants may lead to the degradation of storm water in downstream channels and require mitigation to reduce impacts to less than significant.</p>	<p>Regular inspections shall be performed on sediment control measures called for in the Storm Water Pollution Prevention Plan. Monthly reports shall be maintained and available for City inspection. An inspection log shall be maintained for the project and shall be available at the site for review by the City of Moreno Valley and the Regional Water Quality Control Board.</p> <p>Prior to discretionary permit approval for individual plot plans, a site-specific Water Quality Management Plan (WQMP) shall be submitted to the City Land Development Division for review and approval. The Water Quality Management Plan shall specifically identify site design, source control, and treatment control Best Management Practices that shall be used on site to control pollutant runoff and to reduce impacts to water quality to the maximum extent practicable. The Water Quality Management Plan shall be consistent with the Water Quality Management Plan approved for the overall World Logistics Center Specific Plan project. At a minimum, the site developer shall implement the following site design, source control, and treatment control Best Management Practices as appropriate:</p> <p>Site Design Best Management Practices</p> <ul style="list-style-type: none"> (a) Minimize urban runoff. (b) Maximize the permeable area. (c) Incorporate landscaped buffer areas between sidewalks and streets. (d) Maximize canopy interception and water conservation by planting native or drought-tolerant trees and large shrubs. (e) Use natural drainage systems. (f) Where soil conditions are suitable, use perforated pipe or gravel filtration pits for low flow infiltration. (g) Construct on-site ponding areas or retention facilities to increase opportunities for infiltration consistent with vector control objectives. (h) Minimize impervious footprint. (i) Construct streets, sidewalks and parking lot aisles to the minimum widths necessary, provided that public safety and a walkable environment for pedestrians are not compromised. 	<p>Less than Significant with Mitigation</p>

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	<p>(j) Reduce widths of street where off-street parking is available.</p> <p>(k) Minimize the use of impervious surfaces such as decorative concrete, in the landscape design.</p> <p>(l) Conserve natural areas.</p> <p>(m) Minimize Directly Connected Impervious Areas (DCIAs).</p> <p>(n) Runoff from impervious areas will sheet flow or be directed to treatment control Best Management Practices.</p> <p>(o) Streets, sidewalks, and parking lots will sheet flow to landscaping/bioretenement areas that are planted with native or drought tolerant trees and large shrubs.</p> <p>Source Control Best Management Practices</p> <p>Source control Best Management Practices are implemented to eliminate the presence of pollutants through prevention. Such measures can be both non-structural and structural.</p> <p><u>Non-structural source control Best Management Practices include:</u></p> <p>(a) Education for property owners, operator, tenants, occupants, or employees;</p> <p>(b) Activity restrictions;</p> <p>(c) Irrigation system and landscape maintenance;</p> <p>(d) Common area litter control;</p> <p>(e) Street sweeping private streets and parking lots; and</p> <p>(f) Drainage facility inspection and maintenance.</p> <p><u>Structural source control Best Management Practices include:</u></p> <p>(g) MS4 stenciling and signage;</p> <p>(h) Landscape and irrigation system design;</p> <p>(i) Protect slopes and channels; and</p> <p>(j) Properly design fueling areas, trash storage areas, loading docks, and</p>	

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	<p>outdoor material storage areas.</p> <p>Treatment Control Best Management Practices</p> <p>Treatment control Best Management Practices supplement the pollution prevention and source control measures by treating the water to remove pollutants before it is released from the project site. The treatment control Best Management Practice strategy for the project is to select Low Impact Development (LID) Best Management Practices that promote infiltration and evapotranspiration, including the construction of infiltration basins, bioretention facilities, and extended detention basins. Where infiltration Best Management Practices are not appropriate, bioretention and/or biotreatment Best Management Practices (including extended detention basins, bioswales, and constructed wetlands) that provide opportunity for evapotranspiration and incidental infiltration may be utilized. Harvest and Reuse Best Management Practice will be used to store runoff for later non-potable uses.</p> <p>Site-specific Water Quality Management Plans have not been prepared at this time as no site-specific development project has been submitted to the City for approval. When specific projects within the project are developed, Best Management Practices will be implemented consistent with the goals contained in the Master Water Quality Management Plan. All development within the project will be required to incorporate on-site water quality features to meet or exceed the approved Master Water Quality Management Plan's water quality requirements identified previously.</p> <p>4.9.6.3B</p> <p>The Property Owners Association (POA) and all property owners shall be responsible to maintain all onsite water quality basins according to requirements in the guidance Water Quality Management Plan and/or subsequent site-specific Water Quality Management Plans, and established guidelines of the Regional Water Quality Control Board. Failure to properly maintain such basins shall be grounds for suspension or revocation of discretionary operating permits, and/or referral to the Regional Water Quality Control Board for review and possible action. This measure shall be implemented to the satisfaction of the City Land Development Division, in consultation with the City Engineer, and Regional Water Quality Control Board.</p> <p>4.9.6.3C</p> <p>Prior to issuance of future discretionary permits for any development along the southern boundary of the World Logistics Center Specific Plan (WLCSP), the project developer of such sites, in cooperation with the Property Owners Association (POA), shall establish and annually fund a Water Quality Mitigation Monitoring Plan (WQMMP) to confirm that project runoff will not have deleterious effects on the adjacent San Jacinto Wildlife Area (SJWA). This program shall include at least</p>	

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<p>Cumulative Hydrology and Water Quality</p> <p>The drainage system for the proposed WLC project would maintain post-development runoff at pre-development levels for off-site downstream properties. Therefore, the proposed WLC project will not make a significant contribution to any cumulatively considerable impacts related to drainage or water quality.</p>	<p>quarterly sampling along the southern boundary of the site (i.e., at the identified outlet structures of the project detention basins) during wet season flows and/or when water is present, as well as sampling of any dry-season flows that are observed entering the San Jacinto Wildlife Area property from the project property, including Drainage 9, which is planned to convey only clean off-site flows from north of the World Logistics Center Specific Plan site across Gilman Springs Road. The program shall also include at least twice yearly sampling after completion of construction, and a pre-construction survey must be completed to determine general water quality baseline conditions prior to and during development of the southern portion of the World Logistics Center Specific Plan. This sampling shall be consistent with and/or comply with the requirements of applicable Storm Water Pollution Prevention Plans (SWPPPs) for the development site.</p> <p>The project developer of sites along the southern border of the World Logistics Center Specific Plan shall be responsible for preventing or eliminating any toxic pollutant (not including sediment) found to exceed applicable established public health standards. In addition, the discharge from the project shall not cause or contribute to an exceedance of Receiving Water Quality Objectives for the potential pollutants associated with the project as identified in Table 4.9.J. Once development is complete, the developer shall retain qualified personnel to conduct regular (i.e., at least quarterly) water sampling/testing of any basins and their outfalls to ensure the San Jacinto Wildlife Area will not be affected by water pollution from the project site. This measure shall be implemented to the satisfaction of the City Land Development Division Manager based on consultation with the project developer, Eastern Municipal Water District, the Regional Water Quality Control Board-Santa Ana Region, and the Mystic Lake Manager.</p>	Less than Significant
<p>Cumulative Hydrology and Water Quality</p> <p>The drainage system for the proposed WLC project would maintain post-development runoff at pre-development levels for off-site downstream properties. Therefore, the proposed WLC project will not make a significant contribution to any cumulatively considerable impacts related to drainage or water quality.</p>	<p>Previously referenced Mitigation Measures 4.9.6.1A, 4.9.6.1B, 4.9.6.2A and 4.9.6.2B, and 4.9.6.3A through 4.9.6.3C. No additional mitigation is required.</p>	Less than Significant

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4.10 Land Use and Planning		
LESS THAN SIGNIFICANT IMPACTS		
Conflict with Applicable Land Use Plans, Policies, or Regulations		
<p>The land uses per se of the project are not consistent with SCAG growth projections and some Compass Plan policies because they are not residential in nature. However, the project will substantially improve the City's job/housing balance which is consistent with these regional plans. The WLC project is consistent with the City General Plan upon approval of the requested General Plan Amendment. The project is consistent with the City's Housing Element. Therefore, the project is consistent with both regional and local land use plans, policies, and regulations.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
Conflict with any Applicable Habitat or Natural Community Conservation Plan		
<p>The project will be required to comply with the requirements of the County's MSHCP and pay its development impact fee.</p>	<p>Previously referenced Mitigation Measures 4.4.6.1A through 4.4.6.1C, 4.4.6.2A and 4.4.6.2B, 4.4.6.3A and 4.4.6.3B, and 4.4.6.4A through 4.4.6.4F related to Biological Resources will be implemented, and no additional mitigation is required.</p>	<p>Less than Significant</p>
Cumulative Land Use and Planning Impacts		
<p>The WLC project would not have significant project-related impacts related to dividing an established community, conflicting with applicable land use plans, policies, or regulations, or conflicting with an approved habitat conservation plan. While the WLC project would represent a shift in land use policy, this policy shift does not represent a significant CEQA impact.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>

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Issues/Impacts	Mitigation Measures	Level of Significance
SIGNIFICANT IMPACTS		
Physically Divide an Established Community		
The WLC is located in the eastern end of the City, so its development would not physically divide an established community. However, development could adversely affect seven existing rural residences onsite, and the land plan cannot accommodate residences within logistics warehousing areas.	No feasible mitigation is available.	Significant and Unavoidable
4.11 Mineral Resources		
LESS THAN SIGNIFICANT IMPACTS		
Loss of Statewide, Regional, or Locally Important Mineral Resources		
The project site and surrounding area do not contain any identified regional or local mineral resources, nor are there any ongoing mineral resource extraction activities in the project area.	No mitigation is required.	No impact
Cumulative Mineral Resources		
The WLC project site does not contain significant forest resources, so it will not make a significant contribution to cumulatively considerable impacts relative to any forest resources.	No mitigation is required.	Less than Significant
SIGNIFICANT IMPACTS		
None	Not applicable	Less than Significant

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Issues/Impacts	Mitigation Measures	Level of Significance
4.12 Noise		
LESS THAN SIGNIFICANT IMPACTS		
Groundborne Vibration		
Project-related earthwork will create groundborne vibration, but the project noise study determined it would not exceed significance criteria for adjacent residential uses.	No mitigation is required.	Less than Significant
Airport Noise		
There are no public airports or private airstrips within two miles of the project site, so there will be no significant airport-related noise.	No mitigation is required.	No Impact
SIGNIFICANT IMPACTS		
Impact 4.12.6.1 Short-Term Construction Noise		
Project construction will create significant noise levels for on-site uses and off site away from the project site due to construction vehicle travel.	<p>4.12.6.1A Prior to issuance of any discretionary project approvals, a Noise Reduction Compliance Plan (NRCP) shall be submitted to and approved by the City. The Noise Reduction Compliance Plan shall show the limits of nighttime construction in relation to any then-occupied residential dwellings and shall be in conformance with City standards. Conditions shall be added to any discretionary projects requiring that the limits of nighttime grading be shown on the Noise Reduction Compliance Plan and all grading plans submitted to the City (per Noise Study MM N-2, pg. 51).</p> <p>4.12.6.1B All construction equipment, fixed or mobile, shall be equipped with operating and maintained mufflers consistent with manufacturers' standards.</p> <p>4.12.6.1C Construction vehicles shall be prohibited from using Redlands Boulevard south of Eucalyptus Avenue to access on-site construction for all phases of development of the Specific Plan (per Noise Study MM N-1, pg. 51).</p> <p>4.12.6.1D No grading shall occur within 2,800 feet of residences south of State Route-60 between 8 p.m. and 6 a.m. on weekdays and between 8 p.m. and 7 a.m. on weekends. These restrictions shall be included as part of the Noise Reduction Compliance Plan per Mitigation Measure 4.12.6.1A (per Noise Study MM N-2, pg. 51).</p>	Significant and Unavoidable

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	<p>51)</p> <p>4.12.6.1E As an alternative to Mitigation Measure 4.12.6.1D, a 12-foot tall temporary construction sound barrier may be installed for residences within 1,580 feet of active nighttime construction areas. The temporary sound barrier shall be constructed of plywood with a total thickness of 15 inches, or a sound blanket wall may be used. If sound blankets are used, they must have a Sound Transmission Class (STC) rating of 27 or greater. This shall be included as part of the Noise Reduction Compliance Plan required in Mitigation Measure 4.12.6.1A, which shall be reviewed and approved by the City prior to implementation (per Noise Study MM N-2 and N-3, pg. 51 and pg. 52).</p> <p>4.12.6.1F As an alternative to Mitigation Measure 4.12.6.1D and 4.12.6.1E, on-site noise measurements of construction areas may be taken by qualified personnel and specific buffer distances between construction activities and existing residences may be proposed based on actual noise levels. These measurements will be incorporated into the Noise Reduction Compliance Plan required in Mitigation Measure 4.12.6.1A, which shall be reviewed and approved by the City prior to implementation (per Noise Study MM N-2, pg. 51).</p> <p>4.12.6.1G Any discretionary approvals for development that proposes grading within 1,580 feet of occupied residential units shall require that all grading equipment be equipped with residential grade mufflers (or better). All stationary construction equipment shall be placed so that emitted noise is directed away from noise-sensitive receptors nearest the site. Additionally, stationary construction equipment shall have all standard acoustic covers in place during operation (per Noise Study MM N-4, pg. 52).</p> <p>4.12.6.1H All material stockpiles in connection with any grading operations shall be located at least 1,200 feet from existing residences (per Noise Study MM N-5, pg. 52).</p> <p>4.12.6.1I All project-related off-site construction shall be limited to 6 a.m. and 8 p.m. on weekdays only. Construction during weekends and City holidays shall not be permitted (per Noise Study MM N-6, pg. 53) to the satisfaction of the Land Development Division/Public Works.</p> <p>4.12.6.1J Prior to issuance/approval of any grading permits, off-site construction activities adjacent to residential uses shall provide for installation of 12-foot temporary sound barriers for construction activities lasting more than one month. The sound barrier will reduce noise levels by approximately 10 dB. The temporary sound barrier may be constructed of plywood with a total thickness of 1.5 inches, or a sound blanket</p>	

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<p>Impact 4.12.6.2 Long-Term Traffic Noise Project operations will create significant long-term noise impacts on site and along a number of off-site roadways. Not all off-site impacts can be mitigated to less than significant levels by installing sound-attenuation improvements.</p>	<p>wall may be used. If sound blankets are used, the curtains must have a Sound Transmission Class (STC) rating of 27 or greater. No off-site construction is permitted during weekday nighttime hours (8 p.m. to 6 a.m.) or during weekends and City holidays except for emergencies (per Noise Study MM N-7, pg. 53).</p>	
<p>4.12.6.2A When processing future individual buildings under the World Logistics Center Specific Plan, as part of the City's approval process, the City shall require the Applicant to take the following three actions for each building prior to approval of discretionary permits for individual plot plans for the requested development: Action 1: Perform a building-specific noise study to ensure that the assumptions set forth in the FEIR prepared for the programmatic level entitlement remain valid. These procedure used to conduct these noise analyses shall be consistent with the noise analysis conducted in the programmatic FEIR and shall be used to impose building-specific mitigation on the individually-proposed buildings. Action 2: If the building-specific analyses identify that the proposed development triggers the need for mitigation from the proposed building, including all preceding developments in the specific plan area, the Applicant shall implement the mitigation identified in the WLC FEIR. Prior to implementing the mitigation, the Applicant shall send letters by registered mail to all property owners and non-owner occupants of properties that would benefit from the proposed mitigation asking them to provide a position either in favor of or in opposition to the proposed noise abatement mitigation within 45 days. Each property shall be entitled to one vote on behalf of owners and one vote per dwelling on behalf of non-owner occupants. If more than 50% of the votes from responding benefited receptors oppose the abatement, the abatement will not be considered reasonable. Additionally, for noise abatement to be located on private property, 100% of owners of property upon which the abatement is to be placed must support the proposed abatement. In the case of proposed noise abatement on private property, no response from a property owner, after three attempts by registered mail, is considered a <i>no</i> vote. At the completion of the vote at the end of the 45 day period, the Applicant shall provide the tentative results of the vote to all property owners by registered mail. During the next 15 calendar days following the date of the mailing, property owners may change their vote. Following the 15-day period, the results of the vote will be finalized and made public. Action 3: Upon consent from benefited receptors and property owners, the Applicant</p>		Significant and Unavoidable

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	<p>shall post a bond for the cost of the construction of the necessary mitigation as estimated by the City Engineer to ensure completion of the mitigation. The certificate of occupancy permits shall be issued upon posting of the bond or demonstration that 50% of the votes from responding benefited receptors oppose the abatement or, if the abatement is located on private property, any property owners oppose the abatement (per Noise Study MM N-8, pg.53).</p> <p>4.12.6.2B Prior to issuance/approval of any building permits, the centerline of Cactus Avenue Extension will be located no closer than 114 feet to the residential property lines along Merwin Street. An alternative is to locate the roadway closer to the residences and provide a soundwall along Cactus Avenue Extension. The soundwall location and height should be determined by a Registered Engineer, and the soundwall shall be designed to reduce noise levels to less than 65 CNEL at the residences. The Engineer shall provide calculations and supporting information in a report that will be required to be submitted to and approved by the City prior to issuing permits to construct the road (per Noise Study, pg. 51, Cactus Avenue Extension, ID #50).</p> <p>4.12.6.2C Prior to the approval of any discretionary permits, cumulative impact areas shown in the WLC EIR Noise Study shall be included in the soundwall mitigation program outlined in Mitigation Measures 4.12.6.2A and 4.12.6.2D (per Noise Study MM N-9, pg. 62).</p> <p>4.12.6.2D Prior to issuance of a building permit, the applicant shall demonstrate that the development maintains a buffer with soundwall for noise attenuation at residential/warehousing interface (i.e., western and southwestern boundaries of the project site). To keep the noise levels at nearby residential areas less than typical ambient conditions, the warehousing property line shall be located a minimum of 250 feet from the residential zone boundary, and a 12-foot noise barrier shall be located along the perimeter of the property that faces any residential areas. The 12 foot noise barrier may be a soundwall, berm, or combination of the two. The height shall be measured relative to the pad of the warehouse. This requirement shall be implemented anytime residential areas are within 600 feet of the warehousing property line to insure that a noise level of 45 dBA (Leq) will not be exceeded at the residential zone. This requirement is consistent with Item 10 of Municipal Code Section 9.16.160 Business park/industrial that states, "All manufacturing and industrial uses adjacent to residential land uses shall include a buffer zone and/or noise attenuation wall to reduce outside noise levels" (per Noise Study MM N-10, pg.62)</p>	

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<p>Impact 4.12.6.3 Long-Term Operational Noise</p> <p>Potential long-term stationary noise impacts would primarily be associated with operations at logistics facilities within the WLCSP area. With implementation of a minimum 250-foot setback from residential uses, potential long-term operational noise impacts would be less than significant.</p>	<p>The project noise assessment determined that operational noise impacts from warehouse activities would not exceed City standards at nearby residential areas with implementation of the 250-foot setback requirement.</p>	<p>Less than Significant with Mitigation</p>
<p>Impact 4.12.6.4 Long-Term Utility Noise</p> <p>Noise generated by SCGC blow-down events has the potential to cause permanent hearing loss in persons in the developed area of the project. This is a significant impact and mitigation is required.</p>	<p>4.12.6.4A Prior to the issuance of building permits for projects within 1,300 feet of the Southern California Gas Company (SCGC) and San Diego Gas and Electric (SDG&E) blow-down facilities, documentation shall be submitted to the City confirming that sound attenuation devices and/or improvements for the blow-down facilities providing at least a 40 dB reduction in noise levels during blow-down events are available and will be installed for all planned blow-down events. It shall be the responsibility of the developer to fund all sound attenuation improvements to the blow-down facilities required by this measure. It shall also be the responsibility of the developer to coordinate with San Diego Gas and Electric and/or Southern California Gas Company regarding the installation of any sound attenuation devices or improvements on the blow-down facilities at either the San Diego Gas and Electric compressor station or the Southern California Gas Company pipelines. This measure shall be implemented to the satisfaction of the City Land Management Division (per Noise Study MM N-11, pg.65).</p>	<p>Less than Significant with Mitigation</p>
<p>Impact 4.12.6.5 Cumulative Noise Impacts</p> <p>Traffic noise level increases from the existing baseline condition and the future (2022 and 2035) time horizons are attributable to the intermingled effects of both the cumulative development projects in the project vicinity and region as well as the proposed project. This is a significant impact and mitigation is required.</p>	<p>Previously referenced Mitigation Measures 4.12.6.1A through 4.12.6.1I, 4.12.6.2A through 4.12.6.2C, 4.12.6.3A, and 4.12.6.4A will be implemented, but cumulative noise impacts will still be significant.</p>	<p>Significant and Unavoidable</p>

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4.13 Population, Housing, and Employment		
LESS THAN SIGNIFICANT IMPACTS		
Population Growth		
The project proposes to develop logistics warehouses which will result in minimal direct population increase in the City, although some workers may move to the City to work at this project, and some local residents will also work at this project. The project will not necessitate extension of major infrastructure and the project will not remove obstacles that will result in substantial population growth.	No mitigation is required.	Less than Significant
Displace Substantial Housing/People		
The existing seven rural residences on the site will eventually convert to "Light Logistics" uses. The project will eliminate the potential for the site to provide 388 units of affordable housing that were proposed under the Moreno Highlands Specific Plan. However, the City can meet its regional housing goals without these units, and the project is consistent with the City's current Housing Element.	No mitigation required.	Less than Significant
SIGNIFICANT IMPACTS		
None	Not applicable	Not applicable
Cumulative Population, Housing, and Employment Impacts		
Implementation of the proposed WLC project would improve the City's jobs/housing ratio by creating thousands of new construction and permanent jobs in the City. Therefore, it will not result in cumulatively considerable impacts to	No mitigation is required.	Less than Significant

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population or housing.		
4.14 Public Services and Facilities		
LESS THAN SIGNIFICANT IMPACTS		
Police Protection		
As development under the WLCSP, the need for police services will increase. Future projects will pay applicable development impact fees and contribute property taxes to fund needed police services.	No mitigation is required.	Less than Significant
Fire Protection		
As development under the WLCSP, the need for fire services will increase. Under the WLCSP, a new fire station site will be contributed to the City. Future projects will pay applicable development impact fees and contribute property taxes to fund needed police services.	No mitigation is required.	Less than Significant
Schools		
Future industrial development will contribute no new students to local schools. Payment of the school impact fees to the MVUSD and SJUSD will reduce potential impacts to school services and facilities to less than significant levels.	No mitigation is required.	Less than Significant
Parks, Recreation, Trails		
Development under the WLCSP is logistics warehousing which will not generate new City residents who require additional parks and trails. The WLCSP proposes trail connections to Redlands Boulevard, Cactus Avenue, and the State-owned land to the south, plus a loop trail	No mitigation is required.	Less than Significant

Table 1.B: World Logistics Center Project Environmental Impact Summary

Issues/Impacts	Mitigation Measures	Level of Significance
through the WLCSP site.		
New or Physically Altered Recreation and Park Facilities		
Development under the WLCSP is logistics warehousing which will not generate new City residents who require additional or altered parks.	No mitigation is required.	Less than Significant
Cumulative Public Services and Facilities Impacts		
As development occurs, the need for public services will incrementally increase. Anticipated property tax increases and payment of DJF fees to the City will effectively mitigate potential cumulative impacts to public services.	No mitigation is required.	Less than Significant
SIGNIFICANT IMPACTS		
None	Not applicable	Less than Significant
4.15 Traffic and Circulation		
LESS THAN SIGNIFICANT IMPACTS		
Air Traffic Patterns		
The project site is not within two miles of a public airport or private airstrip, and there are no major air traffic patterns over or in the immediate vicinity of the project site.	No mitigation is required.	Less than Significant
Design Hazard Features		
The project site is currently vacant agricultural land with only two major roadways (Theodore Street and Alessandro Boulevard). Under the WLCSP, a complete arterial circulation network will eventually be constructed that will allow full truck access and minimize road-related hazards.	No mitigation is required.	Less than Significant

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Issues/Impacts	Mitigation Measures	Level of Significance
<p>Emergency Access</p> <p>The project site is currently vacant agricultural land with only two major roadways and minimal need for emergency services. Development under the WLCSP will eventually result in the construction of a complete arterial circulation network which will allow full access for emergency vehicles and services.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
<p align="center">Alternative Transportation Policies, Plans, or Programs</p>		
<p>The proposed project will create a complete roadway circulation network, install a loop trail system, have Class II bikeways and sidewalks on all internal arterial streets, and streets can accommodate bus turnouts when needed by the local transit agency.</p>	<p>Carpooling is required under Air Quality Mitigation Measure 4.3.6.4A. No additional mitigation is required.</p>	<p>Less than Significant</p>
<p align="center">SIGNIFICANT IMPACTS</p>		
<p align="center">Impact 4.15.6.1 Existing (2012) With Phase 1 Conditions Traffic and Level of Service</p>		
<p>Existing baseline (year 2012) with Phase 1 intersection levels of service for the study area intersections include 15 study intersections where Phase 1 of the project would have a significant impact. Twelve of these intersections already exceed the threshold of significance under existing conditions and would therefore be considered cumulative impacts and mitigation is required. Phase 1 of the project would cause a direct project impact at the other three intersections and mitigation is required.</p>	<p>4.15.7.4A A traffic impact analysis ("TIA") conforming to the guidelines for traffic impact analysis adopted by the City shall be submitted in conjunction with each Plot Plan application within the World Logistics Center Specific Plan. Prior to the approval of the Plot Plan, the City shall review the traffic impact analysis to determine if any of the traffic improvements listed in Final EIR Volume 2 Tables 4.15.AV through 4.15.BA (TIA Tables 74 through 79) of the traffic impact analysis prepared for the Program Environmental Impact Report are required to be completed prior to the issuance of a certificate of occupancy for each building. If the City determines that any of the improvements within Moreno Valley are required to be constructed in order to ensure that the traffic impacts which will result from the construction and operation of the building will be mitigated into insignificance, then the completion of construction of the improvements prior to the issuance of a Certificate of Occupancy for the building shall be made a Condition of Approval of the Plot Plan. Construction of improvements within the City shall be subject to credit/reimbursement</p>	<p>Significant and Unavoidable</p>

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Issues/Impacts	Mitigation Measures	Level of Significance
	<p>agreement for those DIF and/or TUMF eligible costs. If the City determines that any of the improvements outside Moreno Valley are required to be constructed in order to ensure that the traffic impacts which will result from the construction and operation of the building will be mitigated to a less than significant level, then the payment of any necessary fair share contribution as prescribed in Mitigation Measure 4.15.7.4G prior to the issuance of a Certificate of Occupancy for the building shall be made a Condition of Approval of the Plot Plan. If the City determines that the traffic impacts which will result from the construction or operation of a building will be significantly more adverse than those shown in the Program Environmental Impact Report, further environmental review shall be conducted prior to the approval of the Plot Plan pursuant to Public Resources Code § 21166 and CEQA Guidelines § 15162 to determine what additional mitigation measures, if any, will be required in order to maintain the appropriate levels of service.</p>	
	<p>4.15.7.4B</p> <p>As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require the dedication of appropriate right-of-way consistent with the Subdivision Map Act for frontage street improvements contained within the World Logistics Center Specific Plan Circulation Map, as shown in this Program EIR Figure 3-10 (or Figure 22 in the TIA prepared for this Program EIR). Required dedications shall be made prior to the issuance of occupancy permits for the requested development.</p>	
	<p>4.15.7.4C</p> <p>As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require each project to pay the Development Impact Fee (DIF) as set forth in Municipal Code Chapter 3.42. Required DIF payments shall be made prior to the issuance of occupancy permits for the requested development.</p>	
	<p>4.15.7.4D</p> <p>As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require each project to pay the requisite Transportation Uniform Mitigation Fee (TUMF) as set forth in Municipal Code Sections 3.55.050 and 3.55.060. Required TUMF payments shall be made prior to the issuance of occupancy permits for the requested development.</p>	
	<p>4.15.7.4E</p> <p>In order to ensure that all of the Project's traffic impacts are mitigated to the greatest extent feasible, the Applicant shall contribute its fair share of the cost of the needed traffic improvements that are not within the City as identified in the</p>	

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	<p>World Logistic Center Specific Plan Traffic Impact Analysis (i.e., under the jurisdiction of other cities, the County of Riverside or Caltrans, pursuant to Mitigation Measure 4.15.7.4F). As used in this mitigation measure, the Applicant's "fair share" has been determined in compliance with the requirements of the Fee Mitigation Act, Government Code § 66000 et seq., and, pursuant to § 66001(g), does not require that the Applicant be responsible for making up for any existing deficiencies.</p> <p>For example, the intersection of Martin Luther King Blvd. and the I-215 northbound ramps (Intersection 85) in the City of Riverside was identified as a place where the World Logistic Center contributes to cumulatively significant impacts, and where the fair share contribution of the World Logistic Center project as a whole was computed to be 6.2%. If the City of Riverside establishes a fair share contribution program consistent with this Mitigation Measure 4.15.7.4F to improve that intersection, then when a certificate of occupancy is to be issued for a 2-million square feet high-cube warehouse in the World Logistic Center (approximately 5% of the entire World Logistic Center project) the amount of the fair share payment due from the Applicant to the City of Riverside would be computed as follows:</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Amount Due</td> <td style="width: 10%;">=</td> <td style="width: 20%;">Total cost of Improvement</td> <td style="width: 10%;">x</td> <td style="width: 20%;">Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis</td> <td style="width: 15%;">x</td> <td style="width: 10%;">% attributable to the building that is subject to the certificate of occupancy (5%)</td> </tr> </table> </div>	Amount Due	=	Total cost of Improvement	x	Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis	x	% attributable to the building that is subject to the certificate of occupancy (5%)	
Amount Due	=	Total cost of Improvement	x	Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis	x	% attributable to the building that is subject to the certificate of occupancy (5%)			

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Issues/Impacts	Mitigation Measures	Level of Significance
	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>A x B x C = D</p> <p>A= % attributable to the building that is subject to the certificate of occupancy (5%)</p> <p>B= Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis</p> <p>C= Total cost of Improvement</p> <p>D= Amount Due</p> </div> <p>A similar calculation would be done for each subsequent building, with payments for each due at the time of issuance of the certificate of occupancy. As a result, while each building individually would not produce a significant impact, and therefore would not be required to pay any mitigation fees if considered by itself, the total amount of the payments for all of the buildings would be equal to the fair share payment for the entire World Logistic Center to the extent that the responsible jurisdiction has chosen to adopt a fair share contribution funding program consistent with Mitigation Measure 4.15.7.4F.</p> <p>4.15.7.4F</p> <p>The Applicant shall pay a portion of the fair share of the cost of traffic improvements identified in the Transportation Impact Analysis for those significantly impacted road segments and intersections for each warehouse building within the World Logistics Center if the impacted jurisdiction has established a fair share contribution program prior to the approval of a building-specific plot plan. The City shall determine whether a fair share program exists in the impacted jurisdiction and, if one does exist, require that the appropriate fees are paid by the Applicant, consistent with the requirements below, prior to the issuance of a certificate of occupancy for the building in question. If no fair share program exists or if the existing programs are not consistent with the requirements below, then no payment of fees shall be required. The impacts are to be determined on a road segment or intersection basis. Nothing in this condition requires the payment of a traffic impact fee imposed by another jurisdiction which covers improvement to facilities where the project does not have a significant impact. Fair-share contributions will be determined on a building-by-building basis as a share of the impact of the Project as a whole (for each segment or intersection where the World Logistics Center project as a</p>	

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Issues/Impacts	Mitigation Measures	Level of Significance
	<p>whole has a significant impact identified in the Programmatic Environmental Impact Report) as determined by the Traffic Impact Analysis and will be due as each certificate of occupancy is issued. The fair share payments for the significantly impacted road segments and intersections identified in the Programmatic Environmental Impact Report will be required even though the impact resulting from a specific building does not, by itself, cause a significant impact.</p> <p>4.15.7.4G City shall work directly with Western Riverside Council of Governments to request that Transportation Uniform Mitigation Fee funding priorities be shifted to align with the needs of the City, including improvements identified in the World Logistics Center Specific Plan traffic impact analysis. Toward this end, City shall meet regularly with Western Riverside Council of Governments.</p>	
<p>Impact 4.15.6.2 Existing (2012) With Project (Buildout) Conditions Traffic and Level of Service Impacts</p> <p>When project traffic under buildout conditions is overlaid on existing roadway and freeway conditions, significant project-specific and cumulative traffic impacts will occur. Local and regional roadway and intersection impacts can be effectively mitigated, as outlined in the project TIA and described in the mitigation measures to the right.</p> <p>At this time, there is no effective mitigation for anticipated project impacts on local freeways. In addition, the City cannot control the timing of improvements required at locations outside of the City of Moreno Valley.</p>	<p>Implementation of previously identified Measures 4.15.7.4A through 4.15.7.4G as they apply to development that occurs from project opening until Buildout.</p>	<p>Significant and Unavoidable (see Cumulative Impacts)</p>
<p>Impact 4.15.6.3 Year 2022 with Project (Phase 1) Conditions Traffic and Level of Service Impacts</p> <p>The project will contribute significant amounts of traffic onto roadways and at intersections in the City of Moreno Valley and other cities, and area freeways, during Phase 1 development (approx. 2013 to 2022).</p>	<p>Implementation of previously identified Measures 4.15.7.4A through 4.15.7.4G as they apply to development that occurs from project opening until Year 2022 (considered to be Phase 1).</p>	<p>Significant and Unavoidable</p>

Table 1.B: World Logistics Center Project Environmental Impact Summary

Issues/Impacts	Mitigation Measures	Level of Significance
Impact 4.15.6.4 Cumulative Impacts - General Plan Buildout (Year 2035) With Project Conditions Traffic and Level of Service Impacts		
The project will contribute significant amounts of traffic onto roadways and at intersections in the City of Moreno Valley and other cities, and area freeways, after completion of development under the WLCSP (i.e., after 2022).	Implementation of previously identified Measures 4.15.7.4A through 4.15.7.4G for development as it occurs during development under the WLCSP.	Significant and Unavoidable
4.16 Utilities and Service Systems		
LESS THAN SIGNIFICANT IMPACTS		
Construction or Expansion of Water Treatment Facilities		
The project can connect to the existing water supply and will not require the construction of any new water storage or treatment facilities.	No mitigation is required.	Less than Significant
Cumulative Water Supply		
The EMWD has determined that it will be able to provide adequate water supply to meet the potable water demand for the project area, including existing and future users, when planned groundwater storage improvements are completed.	No mitigation is required.	Less than Significant
Wastewater Treatment Requirements		
Expected wastewater flows from the proposed WLC project will not exceed the capabilities of the serving treatment plant.	No mitigation is required.	No Impact
Wastewater Treatment Capacity and/or New or Expanded Wastewater Facilities		
The proposed WLC project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, which could cause significant environmental effects.	No mitigation is required.	Less than Significant

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Issues/Impacts	Mitigation Measures	Level of Significance
<p>Cumulative Wastewater Treatment</p> <p>The proposed project, in conjunction with planned and future development within the service area, will incrementally increase the need for wastewater treatment over the long-term. However, the project itself would not require the construction of new wastewater treatment facilities or expansion of existing facilities.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
<p>Solid Waste Facilities</p> <p>Adequate daily surplus capacity exists at the receiving landfill, so project development would not significantly impact current operations or the expected lifetime of the landfill serving the project area.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
<p>Solid Waste Reduction</p> <p>The project would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991) and other applicable local, state, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to the Badlands Sanitary Landfill is reduced in accordance with existing regulations.</p>	<p>Implementation of previously identified Air Quality Mitigation Measure 4.3.6.4B will help reduce long-term production of solid waste from the site, and no additional mitigation is required.</p>	<p>Less than Significant</p>
<p>Cumulative Solid Waste</p> <p>The proposed project, in conjunction with planned development in the surrounding region, will contribute increased volumes of solid waste to local landfills. However, these volumes will not exceed the capabilities of the County's waste management system. Consequently, cumulative impacts associated with solid waste within the City would be considered</p>	<p>Implementation of previously identified Air Quality Mitigation Measure 4.3.6.4B will help reduce long-term production of solid waste from the site.</p>	<p>Less than Significant</p>

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Issues/Impacts	Mitigation Measures	Level of Significance
less than significant.		
Cumulative Energy Facilities and Consumption		
<p>The WLC project, in conjunction with planned development in the region, will increase energy consumption as development occurs. The project will adhere to Title 24 and the California Green Building Code, and will exceed Title 24 energy consumption guidelines by at least 10 percent. Therefore, the project will not make a significant contribution to energy facilities or consumption.</p>	<p>Implementation of project as designed (i.e., with sustainability outlined in WLCSP) and allowance for future “solar ready” buildings (PV installations), plus implementation of Mitigation Measures 4.16.4.6.1A and 4.16.4.6.1C will reduce project’s contribution to cumulative energy consumption to less than significant levels.</p>	Less than Significant
SIGNIFICANT IMPACTS		
Impact 4.16.1.6.1 Adequate Water Supply		
<p>The Water Supply Assessment prepared for the project by Eastern Municipal Water District determined there were sufficient supplies of water to serve the proposed project. However, the supply of water imported from the State is not currently guaranteed, so there may be significant impacts related to long-term water supply.</p>	<p>4.16.1.6.1A Prior to approval of a precise grading permit for each plot plan for development within the World Logistics Center Specific Plan (WLCSP), the developer shall submit landscape plans that demonstrate compliance with the World Logistics Center Specific Plan, the State of California Model Water Efficient Landscape Ordinance (AB 1881), and Conservation in Landscaping Act (AB 325). This measure shall be implemented to the satisfaction of the Planning Division. Said landscape plans shall incorporate the following:</p> <ul style="list-style-type: none"> • Use of xeriscape, drought-tolerant, and water-conserving landscape plant materials wherever feasible and as outlined in Section 6.0 of the World Logistics Center Specific Plan; • Use of vacuums, sweepers, and other “dry” cleaning equipment to reduce the use of water for wash down of exterior areas; • Weather-based automatic irrigation controllers for outdoor irrigation (i.e., use moisture sensors); • Use of irrigation systems primarily at night or early morning, when evaporation rates are lowest; • Use of recirculation systems in any outdoor water features, fountains, etc.; 	Less than Significant with Mitigation

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Issues/Impacts	Mitigation Measures	Level of Significance
	<ul style="list-style-type: none"> • Use of low-flow sprinkler heads in irrigation system; • Provide information to the public in conspicuous places regarding outdoor water conservation; and • Use of reclaimed water for irrigation if it becomes available. <p>4.16.1.6.1B All buildings shall include water-efficient design features outlined in Section 4.0 of the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development Division/Public Works. These design features shall include, but not be limited to the following:</p> <ul style="list-style-type: none"> • Instantaneous (flash) or solar water heaters; • Automatic on and off water facets; • Water-efficient appliances; • Low-flow fittings, fixtures and equipment; • Use of high efficiency toilets (1.28 gallons per flush [gpf] or less); • Use of waterless or very low water use urinals (0.0 gpt to 0.25 gpf); • Use of self-closing valves for drinking fountains; • Infrared sensors on drinking fountains, sinks, toilets and urinals; • Low-flow showerheads; • Water-efficient ice machines, dishwashers, clothes washers, and other water-using appliances; • Cooling tower recirculating system where applicable; • Provide information to the public in conspicuous places regarding indoor water conservation; and • Use of reclaimed water for wash down if it becomes available. <p>4.16.1.6.1C Prior to approval of a precise grading permit for each plot plan, irrigation plans shall be submitted to and approved by the City demonstrating that the development will have separate irrigation lines for recycled water. All irrigation systems shall be designed so that they will function properly with recycled water if it becomes</p>	

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Issues/Impacts	Mitigation Measures	Level of Significance
<p>Impact 4.16.1.6.2 Storm Water Drainage Requirements</p> <p>The development of the proposed WLC project would introduce a substantial amount of impervious surfaces on the site, which could result in significant increases in off-site runoff.</p>	<p>available. This measure shall be implemented to the satisfaction of the City Planning Division and Land Development Division/Public Works.</p> <p>4.16.1.6.2A Each Plot Plan application for development shall include a concept grading and drainage plan, with supporting engineering calculations. The plans shall be designed such that the existing sediment carrying capacity of the drainage courses exiting the project area is similar to the existing condition. The runoff leaving the project site shall be comparable to the sheet flow of the existing condition to maintain the sediment carrying capacity and amount of available sediment for transport so that no increased erosion will occur downstream. This measure shall be implemented to the satisfaction of the City Land Development Division/Public Works.</p>	<p>Less than Significant with Mitigation</p>
<p>Cumulative Impacts to Water Supply Services</p> <p>The proposed WLC project would connect to existing conveyance infrastructure and adequate treatment capacity is available, so the proposed WLC project would not make a significant contribution to any cumulatively considerable impacts on water supply or infrastructure.</p>	<p>Mitigation not required</p>	<p>Less than Significant with Mitigation</p>
<p>Impact 4.16.4.6.1 Construction or Expansion of Electrical and Natural Gas Facilities</p> <p>Based on calculations contained Tables 4.16.I and 4.16.J, the proposed WLC project would consume approximately 376,426 megawatt-hours (MWh) of electricity and almost 14.6 million cubic feet of natural gas per year. Therefore, the proposed project may induce the need to construct new electrical and natural gas facilities. This is a significant impact that requires mitigation.</p>	<p>4.16.4.6.1A Each application for a building permit shall include energy calculations to demonstrate compliance with the California Energy Efficiency Standards confirming that each new structure meets applicable Building and Energy Efficiency Standards. The plans shall also ensure that buildings are in conformance with the State Energy Conservation Efficiency Standards for Nonresidential buildings (Title 24, Part 6, Article 2, California Administrative Code). This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions. Plans shall show the following: Energy-efficient roofing systems, such as “cool” roofs, that reduce roof temperatures significantly during the summer and therefore reduce the energy requirement for air conditioning. Cool pavement materials such as lighter-colored pavement materials, porous materials, or permeable or porous pavement, for all roadways and walkways not within the public right-of-way, to minimize the absorption of solar heat and</p>	<p>Less than Significant with Mitigation</p>

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Issues/Impacts	Mitigation Measures	Level of Significance
	<p>subsequent transfer of heat to its surrounding environment.</p> <p>Energy-efficient appliances that achieve the 2008 Appliance Energy Efficiency Standards (e.g., EnergyStar Appliances) and use of sunlight-filtering window coatings or double-paned windows.</p> <p>4.16.4.6.1B Prior to the issuance of any building permits within the World Logistics Center Specific Plan, each project developer shall submit energy calculations used to demonstrate compliance with the performance approach to the California Energy Efficiency Standards to the Building and Safety and Planning Divisions that shows each new structure meets the applicable Building and Energy Efficiency Standards. Plans may include but are not necessarily limited to implementing the following as appropriate:</p> <ul style="list-style-type: none"> • High-efficiency air-conditioning with electronic management system (computer control). • Variable Air Volume air distribution. • Outside air (100 percent) economizer cycle. • Staged compressors or variable speed drives to flow varying thermal loads. • Isolated High-efficiency air-conditioning zone control by floors/separable activity areas. • Specification of premium-efficiency electric motors (i.e., compressor motors, air handling units, and fan-coil units). • Use of occupancy sensors in appropriate spaces. • Use of compact fluorescent lamps in place of incandescent lamps. • Use of cold cathode fluorescent lamps. • Use of Energy Star exit lighting or exit signage. • Use of T-8 lamps and electronic ballasts where applications of standard fluorescent fixtures are identified. • Use of lighting power controllers in association with metal-halide or high-pressure sodium (high intensity discharge) lamps for outdoor lighting and parking lots. 	

Table 1.B: World Logistics Center Project Environmental Impact Summary

Issues/Impacts	Mitigation Measures	Level of Significance
	<ul style="list-style-type: none"> • Use of skylights (may conflict with installation of solar panels in some instances). • Consideration of thermal energy storage air conditioning for spaces or hotel buildings, meeting facilities, theaters, or other intermittent-use spaces or facilities that may require air-conditioning during summer, day-peak periods. <p>4.16.4.6.1C Prior to the issuance of a building permit, new development shall demonstrate that each building has implemented the following:</p> <ol style="list-style-type: none"> 1) Install solar panels with a capacity equal to the peak daily demand for the ancillary office uses in each warehouse building; 2) Increase efficiency for buildings by implementing either 10 percent over the 2008 Title 24's energy saving requirements or the Title 24 requirements in place at the time the building permit is approved, whichever is more strict; and 3) Require the equivalent of "Leadership in Energy and Environmental Design Certified" for the buildings constructed at the World Logistics Center based on Leadership in Energy and Environmental Design Certified standards in effect at the time of project approval. <p>This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions.</p>	

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1.11 ALTERNATIVES TO THE PROPOSED PROJECT

In compliance with *CEQA Guidelines* (Section 15126.6), an EIR must describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the project objectives as listed in Table 1.C and would avoid or substantially lessen significant effects of the project. The EIR need not consider every conceivable alternative; rather it must consider a reasonable range of potentially feasible alternatives. This EIR evaluates a “No Project/No Build” as well as a “No Project” alternative (i.e., development according to the General Plan and zoning) in order to allow decision-makers to compare the effect of approving the project to the effect of not approving the project. A more detailed description of each project alternative as well as an analysis of the potential environmental impacts associated with the construction and operation of each is provided in Section 6.0 *Alternatives*. It should be noted that, for all of the alternatives, the 1,084 acres owned by the California Department of Fish and Wildlife (CDFW) and San Diego Gas & Electric (SDG&E) would be designated as Open Space in the City’s General Plan, similar to the proposed project.

1.11.1 No Project/No Development

CEQA requires an analysis of the environmental effects of not developing the proposed project. This allows the reviewer to see what the results of not developing the project site would be and also outlines existing or baseline conditions on the site. With the No Development Alternative, no development would occur and the majority of the site would remain in dry farming, with a small amount in rural residential uses.

1.11.2 No Project/Existing General Plan Alternative

Pursuant to CEQA (§15126.6[e][2]), this No Project Alternative discusses what would reasonably be expected to occur on the site based on current plans and consistent with available infrastructure and community services in the foreseeable future. This alternative would result in development of the project with the land uses currently shown in the City’s General Plan (i.e., the Moreno Highlands Specific Plan or MHSP). The approved 3,038-acre MHSP is a master planned, mixed-use community, consisting of up to 7,763 residential dwelling units on approximately 2,435 acres and approximately 603 acres of business, retail, institutional, and other uses. The 1,084 acres owned by the CDFW and SDG&E are currently designated as Residential, Public Facilities, and Open Space in the City’s General Plan and would be designated as permanent Open Space under this alternative, similar to the proposed project.

1.11.3 Alternative 1: Reduced Density

This alternative would develop approximately 29 million square feet of logistics warehousing (approximately 30% less than under the proposed project) on the 2,610 acres of land under the Specific Plan, including 74.3 acres for open space. The 1,084 acres owned by the CDFW and SDG&E would be designated as Open Space in the City’s General Plan, similar to the proposed project.

1.11.4 Alternative 2: Mixed Use A Alternative

This alternative would result in development of the entire property with a mix of 1,410 acres of logistics warehousing (22 million square feet), 1,000 acres of light manufacturing, assembly, or business park uses (20 million square feet), 50 acres of retail commercial uses (500,000 square feet), 100 acres of professional or medical office uses (1 million square feet), and 150 acres of open space.

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The 1,084 acres owned by the CDFW and SDG&E would be designated as Open Space in the City’s General Plan, similar to the proposed project.

1.11.5 Alternative 3: Mixed Use B Alternative

This alternative would develop the project site similar to the land use plan of the MHSP but with 10 million square feet of logistics warehousing on the 603 acres proposed for business, retail, institutional, and other uses under the MHSP.

1.11.6 Alternative Sites

This alternative would relocate development under the proposed project to another site in the surrounding region. This analysis included potential sites in nearby cities and several unincorporated sites in the general project area. Due to the size and nature of the project, no feasible alternative sites were found in any of the eleven (11) jurisdictions evaluated.

1.11.7 Comparison of Project Alternatives

The following discussion compares the impacts of each alternative with the impacts of the proposed project, as detailed in Section 4.0 of this EIR. Table 1.C compares the impacts of the alternatives with those of the proposed project. This table identifies whether the alternative results in (1) a reduction of the impact; (2) a greater impact than the project; or (3) the same impact as the project.

Table 1.C: Comparison of Alternatives to the Proposed Project

Environmental Issue	Proposed Project	No Project/ No Build	No Project/ Existing General Plan	Alt. 1 Reduced Density	Alt. 2 Mixed Use A	Alt. 3 Mixed Use B
Aesthetics	SIG	NI	←LTS	=	=	←LTS
Agricultural and Forest Resources	LTS/mit	NI	=	=	=	=
Air Quality	SIG	NI	SIG	←SIG	→SIG/+	SIG
Biological Resources	LTS/mit	NI	=	=	=	=
Cultural Resources	LTS/mit	NI	=	=	=	=
Geology and Soils	LTS/mit	NI	=	=	=	=
Global Climate Change	LTS/mit	NI	LTS	LTS/mit	LTS/mit	LTS/mit
Hazards and Hazardous Materials	LTS/mit	NI	=	=	=	=
Hydrology and Water Quality	LTS/mit	NI	=	=	=	=
Land Use and Planning	SIG	NI	LTS	=	=	=
Mineral Resources	NI	=	=	=	=	=
Noise	SIG	NI	←SIG	←SIG	←SIG	←SIG
Population, Housing, and Employment	LTS	NI	+	=	=	+
Public Services (police, fire, schools, parks)	LTS/mit	NI	=	=	=	=

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Table 1.C: Comparison of Alternatives to the Proposed Project

Environmental Issue	Proposed Project	No Project/ No Build	No Project/ Existing General Plan	Alt. 1 Reduced Density	Alt. 2 Mixed Use A	Alt. 3 Mixed Use B
Transportation and Traffic	SIG	NI	→SIG	←SIG	→SIG+	→SIG
Utilities and Service Systems (water, wastewater, etc.)	LTS/mit	NI	=	=	=	=

Proposed Project

NI: No Impact

LTS/mit: Less than Significant Impact with Mitigation

LTS: Less than Significant Impact

SIG: Significant Impact with or without Mitigation

Project Alternatives

= Compared with the proposed project, no change in the significance of impact will occur.

→ Compared with the proposed project, the significance of the impact is increased.

← Compared with the proposed project, the significance of the impact is reduced.

+ Compared with the proposed project, a new impact has been identified.

←SIG Compared with the proposed project, the volume or extent of the impact is reduced, yet still significant.

1.11.8 Environmentally Superior Alternative

As shown above in Table 1.C, the No Project/Existing General Plan Alternative has mixed impacts relative to the proposed project; it reduces aesthetic impacts to less than significant levels but worsens the jobs/housing ratio by introducing more housing than employment-generating uses. The Reduced Density Alternative incrementally reduces a number of impacts of the proposed project (e.g., traffic, air quality, and noise) but cannot reduce them to less than significant levels even with mitigation. The Mixed Use A Alternative substantially increases traffic and related impacts compared to the project impacts, but it does not create any additional significant impacts. The Mixed Use B Alternative would incrementally increase traffic and would not improve the jobs/housing balance. In addition, this alternative would also worsen the jobs/housing ratio of the City by allowing the construction of many more homes than job-creating land uses. Regarding air quality impacts (criteria pollutants), development of any land uses would likely exceed SCAQMD thresholds mainly due to the size of the proposed project site.

The *CEQA Guidelines* (Section 15126.6 (e[2])) requires that an environmentally superior alternative be identified in the EIR. Based on the analysis in Section 6.0 *Alternatives* and the summary contained in Table 1.C, Alternative 1 – Reduced Density – is the only alternative that reduces traffic, air quality, and related impacts by reducing the total square footage of warehousing by approximately 30 percent. Alternative 3 - Mixed Use B - is the only alternative that would reduce a significant impact of the proposed project (i.e., aesthetics – views). However, it would worsen the jobs/housing balance of the City over the long term. For these reasons, Alternative 1 – Reduced Density - has been deemed to be environmentally superior to the proposed project. However, none of the alternatives achieves the objectives of the project to nearly the same degree as the proposed project.

Table 1.D compares Alternative 1 to the project objectives and indicates that Alternative 1 does not meet most of the major goals of the proposed project mainly because of the reduced total square footage by 30 percent, which also reduces the amount of new employment and property tax revenues generated to the City.

Note: The objectives outlined in this table did not correspond to the Project Objectives outlined in the Project Description of the DEIR, therefore, they are being corrected at this time. In addition, some numerical changes result from the changes to the Specific Plan area.

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Table 1.D: Comparison of the Environmentally Superior Alternative to the Project Objectives

Project Objectives	Degree to Which Alternative 1 Satisfies the Project Objectives
Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.	Not to the Same Degree as the Proposed Project. This alternative would provide only 16,797 new employees compared to 24,000 from the proposed project (30% less).
Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan.	Not to the Same Degree as the Proposed Project. The alternative introduces substantially less employment-generating uses on the site which is not consistent with the City's Economic Strategic Plan.
Create a major logistics center with good regional and freeway access.	Not to the Same Degree as the Proposed Project. The alternative would allow 28 MSF of logistics warehousing near the SR-60 Freeway but it would be less attractive as a major regional logistics center compared to the proposed project.
Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.	Meets Objective. Development of the project area under this alternative would most likely proceed under some form of specific plan, which would help ensure future development was consistent with a comprehensive plan for the area.
Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings.	Meets Objective. The alternative would develop a smaller amount of logistics warehousing compared to the proposed project, but it would still be master planned, most likely under a specific plan.
Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach.	Not to the Same Degree as the Proposed Project. The alternative would allow 28 MSF of logistics warehousing vs. 40.6 MSF for the proposed project.
Create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity.	Not to the Same Degree as the Proposed Project. The alternative would not provide nearly as much new warehouse capacity to form a regional port-oriented logistics center compared to the proposed project.
Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.	Not to the Same Degree as the Proposed Project. The alternative would produce 30% less employment than under the proposed project, and would also provide less property tax revenue and be able to pay for less public improvements and infrastructure compared to the proposed project.
Encourage new development consistent with regional and municipal service capabilities.	Not to the Same Degree as the Proposed Project. It is unclear if a substantially reduced logistics warehousing project could afford to provide the necessary infrastructure to support the planned development compared to the proposed project.
Significantly improve the jobs/housing balance and help reduce unemployment within the City.	Not to the Same Degree as the Proposed Project. This alternative would provide only 16,797 new employees compared to 24,000 from the proposed project (30% less).
Provide thousands of construction job opportunities during the project's buildout phase.	Not to the Same Degree as the Proposed Project. The alternative would not provide as much work for as many construction workers compared to the proposed project.
Provide appropriate transitions or setbacks between on-site and off-site uses.	Meets Objective. A smaller logistics warehouse project may be able to provide equal or greater transitions and buffers from existing off-site residential uses compared to the proposed project.

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NOTE TO READERS

The Programmatic Draft Environmental Impact Report (DEIR) for the World Logistics Center Specific Plan (WLCSP) was originally circulated for public review from February 4 to April 8, 2013. Since that time, a number of changes have been made to the WLCSP. The original DEIR has also been revised to account for the changes to the WLCSP and to respond to the many comments received on the DEIR.

The primary change in the WLC Project is the total Specific Plan area has been reduced from 2,710 acres to 2,610 acres and the proposed development reduced from 41.6 million to 40.6 million square feet (both a 3.7 percent reduction) due to the removal of 100 acres in the southwest corner of the Specific Plan. In addition, the Specific Plan land use plan was divided into sixteen (16) Planning Areas based on traffic impact zones which allows for more accurate estimates of potential traffic and air quality impacts of the WLC Project. The revised Specific Plan (September 2014) also now shows a specific location for a “Clean Fueling” facility in Planning Area (PA) 7 at the northeast corner of Theodore Street and Eucalyptus Avenue. In the original WLCSP, a trail was proposed along the edge of the Open Space area in the southwestern portion of the site to connect to existing trails along Redlands Boulevard and Cactus Avenue to the west and planned trails within the San Jacinto Wildlife Area and Mystic Lake to the south. In response to changes to the proposed project and concerns expressed by Native Americans, the trail in the revised WLCSP has been moved away from the northern boundary of the Open Space area (now Planning Area 30) to reduce potential impacts to the Mt. Russell foothills. The WLCSP phasing plan or schedule was also revised or extended from 10 to 15 years, so that Phase 1 runs from 2015 to 2022 and Phase 2 runs from 2023 to 2030. Please refer to FEIR Volume 1 Section 1.4 and Section 3.0, Project Description, in this revised DEIR for a more detailed description of changes to the WLC project.

The technical studies that supported the analysis of environmental impacts in the DEIR were also modified to address changes in the WLCSP and in response to the many comments on the EIR and technical studies. The following studies were revised: agriculture, air quality, biology, cultural resources, greenhouse gases, hydrology/water quality, noise, economic and fiscal impacts, traffic, and utilities. An additional study on agricultural resources was prepared as an independent assessment of onsite resources using the state LESA model (see Section 4.2 in this document). For details on the changes to the technical studies, please refer to FEIR Volume 1 Section 1.6 and the introductory paragraphs of each environmental analysis section of this revised DEIR (Sections 4.1 through 4.16).

In summary, the WLCSP DEIR has been revised based on changes to the WLC project, technical studies, and the many comments received on the DEIR and its related technical studies. Changes to the DEIR document are shown in double underline if they are additions to the original text, and shown as if they are deletions to the original text.

2.0 INTRODUCTION AND PURPOSE

This programmatic Environmental Impact Report (EIR) has been prepared to evaluate the environmental impacts associated with the proposed World Logistics Center Project (“proposed project” or “project”) in Rancho Belago, the eastern portion of the City of Moreno Valley (“City”), and to identify mitigation measures to avoid or minimize significant environmental impacts. The City is the “public agency which has the principal responsibility for carrying out or approving the project” and, as such, is the “Lead Agency” for this project under the California Environmental Quality Act (CEQA) of 1970 (*CEQA Guidelines* section 15367). CEQA requires the Lead Agency to consider the information contained in the EIR prior to taking any discretionary action. The EIR is also a public disclosure document available to agencies and the public for review and comment prior to the consideration of the proposed project by the City, and is intended to serve as an informational document to be considered by the City, Responsible Agencies, and Trustee Agencies during deliberations on the proposed project. The project approvals associated with the proposed project are described in Section 3.0.

This section of the EIR outlines the document’s format; describes the purpose of the EIR; summarizes public review of the EIR; describes the Mitigation Monitoring and Reporting Program (MMRP); identifies the environmental issues discussed in the EIR; and defines the parameters and data to be used in the analysis of cumulative impacts.

2.1 DOCUMENT FORMAT

To assist the reader’s review of the document, the following describes the format of this EIR.

- Section 1.0 Executive Summary* provides a summary of the EIR document and (in Table 1.B) identifies potentially significant impacts, mitigation measures, and the level of significance of each impact following mitigation.
- Section 2.0 Introduction and Purpose* outlines the EIR document’s format including technical appendices; describes the purpose of the EIR including the legal purpose of CEQA, the intended use of EIR, and the EIR’s incorporated documents and referenced technical reports; summarizes the public review of the EIR to date; describes the role of the MMRP to be provided in the Final EIR; identifies the sixteen environmental issues that are discussed; and defines the cumulative analysis provided in the EIR.
- Section 3.0 Project Description* provides a detailed description of the geographical setting, project location, project setting, City of Moreno Valley General Plan designations, World Logistics Center Specific Plan land use designations, zoning designations, project characteristics, project objectives, and discretionary actions required to implement the proposed project. This section also explains the other areas in addition to the Specific Plan that are part of the proposed project (i.e., off-site improvement areas, California Department of Fish and Wildlife property, and public facilities lands).
- Section 4.0 Existing Setting, Impacts, and Mitigation Measures* evaluates the impacts associated with the proposed project. This section is organized by sixteen issue areas with each following the framework:
- *Existing Setting.* Information in the existing setting contains a discussion of the local and regional environment conditions (environmental and man-made) in existence at the time this EIR was prepared. Existing setting information provides the reader with the “baseline” from which future impacts are analyzed, and provides a standard against which to measure these impacts.

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- *Existing Policies and Regulations.* Regulatory requirements and policies (federal, state, and local) applicable to the issue area are summarized.
- *Methodology.* A brief summary of the methods and resources utilized in the preparation of the environmental analysis.
- *Thresholds of Significance.* Determinations regarding the significance of potential impacts resulting from implementation of the proposed project are provided. These thresholds represent the criteria used in this programmatic EIR to determine whether identified impacts are significant.
- *Less than Significant Impacts.* Potential issues for which the proposed project was determined to have no impact or a less than significant impact are identified. For these issues, either no mitigation would be required or adherence to established regulations, standards, and policies would reduce potential impacts to a less than significant level.
- *Significant Impacts.* Potential impacts from implementation of the proposed project are identified. Each of these issues contains an impact analysis, mitigation measures, and significance after mitigation discussion.
 - *Impact Analysis.* An analysis of potential programmatic impacts of the proposed project is presented in this section. This discussion focuses on the impacts of implementation of the proposed project, and includes potential short-term/long-term and direct/indirect project impacts, and consistency with applicable planning documents or regulations.
 - *Project Design Features.* Characteristics of the WLC Specific Plan or other aspects of the WLC project that help reduce potential environmental impacts.
 - *Mitigation Measures.* The measures proposed to mitigate any potential impacts of the proposed project are identified.
 - *Level of Significance after Mitigation* provides a conclusion as to whether implementation of the proposed project will reduce the project-related and cumulative impacts to a level that is less than significant.
- *Cumulative Impacts.* This discussion focuses on the potential environmental effect of the proposed project combined with the effects of reasonably foreseeable cumulative projects within the project study area.

Section 5.0 *Other CEQA Topics* contains discussions of additional topics required by CEQA, including effects found not to be significant, unavoidable effects of the proposed project, and significant irreversible environmental changes. The proposed project's consistency with regional plans (discussed in Section 4.10) and potential to induce growth (discussed in Sections 4.13) are summarized in this section.

Section 6.0 *Alternatives* contains discussion of alternatives to development of the proposed project. As allowed by CEQA, the impacts of these alternatives are evaluated at a more general level than the analyses of the proposed project that is contained in Section 4.0. This section also evaluates the proposed effects of the No Project Alternative and identifies the environmentally superior alternative.

Section 7.0 This section lists the organizations and persons consulted in preparation of the EIR.

Section 8.0 This section contains all the references cited in the EIR, acronyms and abbreviations used in the document, and definitions of terms used, including those specific to the proposed WLC project.

Appendices The Appendices contain a copy of the NOP, NOP mailing list, NOP comment letters and responses, public scoping meeting information, all of the various technical

studies that support the EIR analysis, referenced materials, and other relevant correspondence received during the course of the analysis of the proposed project.

2.2 PURPOSE OF CEQA AND THE ENVIRONMENTAL IMPACT REPORT

According to Section 15002 of *CEQA Guidelines*, the basic purposes of CEQA are to:

- Inform government decision-makers and the public about the potential significant environmental effects of proposed activities;
- Identify ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governing agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

CEQA requires that a project be reviewed to determine the environmental effects that would result if the project were approved and implemented. The City has the responsibility for preparing, processing, and determining whether to approve the proposed project and certify this EIR. As Lead Agency, the City has the authority to make decisions regarding discretionary actions relating to implementation of the proposed project.

2.2.1 Program EIR

This EIR will serve as a Program EIR pursuant to the *State CEQA Guidelines* Section 15168, which states that a Program EIR is appropriate for a project that involves "... a series of actions that can be characterized as one large project and are related either:

- (1) Geographically;
- (2) A logical parts in the chain of contemplated action;
- (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

Section 15168 of the *CEQA Guidelines* explains how a Program EIR relates to future activities within the project area:

- "(c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
- (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
 - (2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

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- (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the program.
 - (4) Where the subsequent activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.
 - (5) A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.
- (d) Use with Subsequent EIRs and Negative Declarations. A program EIR can be used to simplify the task of preparing environmental documents on later parts of the program. The program EIR can:
- (1) Provide the basis in an Initial Study for determining whether the later activity may have any significant effects.
 - (2) Be incorporated by reference to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.
 - (3) Focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before.
- (e) Notice with Later Activities. When a law other than CEQA requires public notice when the agency later proposes to carry out or approve an activity within the program and to rely on the program EIR for CEQA compliance, the notice for the activity shall include a statement that:
- (1) This activity is within the scope of the program approved earlier, and
 - (2) The program EIR adequately describes the activity for the purposes of CEQA.”

2.2.2 World Logistics Center EIR

As previously noted, CEQA requires the Lead Agency to consider the information contained in the EIR prior to taking any discretionary action on a project. This EIR provides information to the Lead Agency and other public agencies, the general public, and decision-makers regarding the potential environmental impacts from the construction and operation of the proposed project. The purpose of the public review of the EIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. Section 15151 of the *CEQA Guidelines* states the following regarding standards from which adequacy is judged:

“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 experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the *CEQA Guidelines*, and provides the information needed to assess the environmental consequences

of a proposed project. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

Under CEQA (PRC Section 21002.1[a]):

“The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the proposed project, and to indicate the manner in which those significant effects can be mitigated or avoided.”

Note: The following revisions are based on project changes outlined in the WLC Specific Plan.

This programmatic EIR has been prepared to evaluate the potential environmental impacts associated with the entitlement, construction and operation of the proposed 40.4 million square feet of logistics warehouse facilities (i.e., the World Logistics Center), as well as its associated infrastructure, designation of the CDFW property as permanent open space, and designation of the Natural Gas Compressor Plant as Public Facility, along with related entitlements. As permitted under the *CEQA Guidelines* (Section 15084[d-e]), LSA Associates, Inc. (LSA) has prepared the EIR under the direction of professional City planning staff. However, prior to certification, the Planning Commission and the City Council must independently review the methodologies used, and conclusions reached in the EIR. The City is undertaking an independent review of this EIR by having City planning staff work with LSA on the EIR, and by employing a third-party consultant to independently review the EIR. If certified by the City, the information included in and the conclusions reached in the EIR will therefore represent the City’s independent judgment.

This programmatic EIR has been prepared utilizing information from City planning and environmental documents, applicant-provided technical studies, and other publicly-available data. Alternatives to the proposed project are also discussed and mitigation measures that would offset, minimize, or otherwise avoid significant environmental impacts from the proposed project have been identified. This EIR has been prepared in accordance with CEQA, California Public Resources Code §21000 *et seq.*; the *Guidelines for California Environmental Quality Act* (California Code of Regulations, Title 14, Chapter 3); and the rules, regulations, and procedures for implementing CEQA as adopted by the City. The objective of the EIR is to inform City decision-makers, representatives of other affected/responsible agencies, the public, and other interested parties of the potential environmental consequences that may be associated with the approval and implementation of the proposed project.

2.3 REGIONALLY SIGNIFICANT PROJECT

When an EIR is prepared for any project that is considered to be of statewide, regional, or area-wide significance, as defined by *CEQA Guidelines* Section 15206, then the Draft EIR must be submitted to the State Clearinghouse and the appropriate metropolitan area council of governments for review and comment. A project is considered to be of statewide, regional, or area-wide significance if it meets any of the following criteria:

- (1) A proposed local general plan, element, or amendment thereof for which an EIR was prepared.
- (2) A project has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located. Projects of this nature would include:
 - (a) A proposed residential development of more than 500 dwelling units.
 - (b) A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.

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- (c) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
 - (d) A proposed hotel/motel development of more than 500 rooms.
 - (e) A proposed industrial, manufacturing, processing plant, or industrial park planned to employ more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.
- (3) A project which would result in cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 (Williamson Act) for any parcel of 100 or more acres.
 - (4) A project for which an EIR has been prepared that is located in and would substantially affect areas of critical environmental sensitivity.
 - (5) A project which would substantially affect sensitive wildlife habitats and habitats for endangered, rare, or threatened species.
 - (6) A project that would interfere with the attainment of regional water quality control standards as stated in the approved area-wide waste treatment management plan.
 - (7) A project that would provide housing, jobs, or occupancy for 500 or more persons within 10 miles of a nuclear power plant.

The World Logistics Center Project, as proposed, would be considered a “project of statewide, regional or area-wide significance” per criteria 2(e). In addition, the Southern California Association of Governments (SCAG) indicated in its NOP letter that this project was regionally significant. Therefore, the NOP, Draft EIR, and NOC will be transmitted to the State Clearinghouse and the appropriate metropolitan area council of governments, which in this case is the Western Riverside Council of Governments (WRCOG), for review and comment.

2.4 INCORPORATED DOCUMENTS

CEQA (§15150) permits the incorporation by reference of all or portions of other documents that are generally available to the public. Any document incorporated by reference shall be made available to the public for inspection at a public place or public building and requires that the EIR state where the incorporated documents will be made available for public inspection. The following documents have been incorporated by reference:

- *City of Moreno Valley General Plan, various elements*, adopted by City Council Resolution No. 2006-83, July 11, 2006, and last updated October 2006.
- City of Moreno Valley General Plan Final Environmental Impact Report, certified July 2006.
- City of Moreno Valley General Plan Land Use Map, last updated August 2010.
- City of Moreno Valley Zoning Atlas, last updated November 2011.
- City of Moreno Valley Municipal Code (various chapters), last updated February 2012.
- Moreno Highlands Specific Plan EIR, adopted 1992.

2.5 TECHNICAL REPORTS

Various technical or project-related reports have been prepared to assess specific issues that may result from the construction and operation of the proposed project. As relevant, information from the following documents and technical reports has been integrated into the EIR as appendices.

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- “The World Logistics Center Specific Plan” (Highland Fairview) original dated January 30, 2013, revised dated September 2014.
- “An Agricultural Industry Analysis of the Inland Empire” (Andrew Chang & Co.), original dated March 2012, revised September 2014.
- “Agricultural Resources Assessment for the WLCSP” (Parsons Brinckerhoff), original dated March 2012, revised December 2013.
- “Agricultural Assessment for the WLCSP” (Cushman and Wakefield) new report dated December 20, 2013 (prepared for Final EIR in response to comments) and revised September 2014.
- “Air Quality, Greenhouse Gas, and Health Risk Assessment for the WLCSP” (MBA), original dated January 2013, revised April 2015.
- “Habitat Assessment, MSHCP Consistency Analysis, and JPR Review” (MBA), original dated December 20, 2012, revised September 2014.
- “Delineation of Jurisdictional Waters and Wetlands” (MBA), original dated November 2012, revised September 2014.
- “Phase I and Phase II Cultural Resources Assessment” (MBA), original dated May 2012, revised September, 2014.
- “Preliminary Geotechnical Investigation” (Leighton), original dated March 23, 2012, revised September 2014.
- “Supplemental Geotech Assessment for Offsite Improvements Related to the WLCSP” (Leighton), original dated March 23, 2013, revised September 2014.
- “Phase 1 Environmental Site Assessments” (various dates, LOR Geotechnical) (not revised).
- “Draft Master Plan of Drainage Study” (CH2MHill) original dated November 2012, revised dated September 2014.
- “Preliminary Water Quality Management Plan” (CH2MHill) original dated November 2012, revised September 2014.
- “Noise Assessment for the WLCSP” (Mestre Greve Associates) original dated January 2013, revised September 2014.
- “Traffic Impact Assessment (TIA) for the WLCSP” (Parsons Brinckerhoff) original dated January 2013, revised September 2014.
- “NAIOP Assessment of Available High-Cube Trip Generation Rates” (Kunzman Associates), December 20, 2011.
- “Water Supply Assessment for the WLCSP” (Eastern Municipal Water District), March 21, 2012.
- “Highlands Water Budget” (CH2MHill), original dated December 2012, revised September 2014.
- “Water System Modeling Results” (CH2MHill), original dated December 2012, revised dated October 22, 2013.
- “Sewer and Reclaimed Wastewater Memorandum” (CH2MHill), original dated April 25, 2012, revised September 2014.
- “Dry Utilities – Technical Memorandum” (Utility Specialists), original dated December 20, 2012, revised September 2014.
- “Electrical System Forecast of Utility Infrastructure” (MVU Engineering), original dated December 2012, revised September 2014.
- “Fiscal and Economic Impact Study for the World Logistics Center” (David Taussig and Associates), original dated January 15, 2013, revised September 2014.

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In addition to their inclusion in their entirety as appendices to this EIR, these documents are available for review at the following location:

Moreno Valley City Hall
Community & Economic Development Department
Planning Division
14177 Frederick Street
Post Office Box 88005
Moreno Valley, California 92552
Phone: (951) 413-3238
Monday–Thursday 7:30 a.m.– 5:30 p.m.
Friday 7:30 a.m. – 4:30 p.m.

2.6 PUBLIC REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

This EIR was distributed to responsible and trustee agencies, other affected agencies, and interested parties. Additionally, in accordance with Public Resources Code Section 21092(b)(3), the EIR was provided to all parties who previously requested copies. The Notice of Completion (NOC) and Notice of Availability (NOA) of the EIR was distributed for a 63-day public review period in excess of the 45 days typically suggested by CEQA. During the public review period, the EIR and technical appendices were made available for review.

Written comments regarding this EIR were addressed to:

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and
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Email: RichardSa@moval.org
Markg@moval.org

After the public review period, written responses to all significant environmental issues raised were prepared and included in the Final EIR Volume 1 – Response to Comments. These responses will be available for review for a minimum of 10 days prior to the public hearings before the City of Moreno Valley Planning Commission and City Council, at which time the certification of the Final EIR will be considered. The Final EIR (which includes the Draft EIR, the public comments and responses to the Draft EIR, and findings) will be included as part of the environmental record for consideration by the City decision-makers. The City will respond as appropriate to comments made at public hearings on the WLC Project and EIR.

2.6.1 Notice of Preparation

The City initiated the environmental process without completion of an Initial Study. The City determined that, due to the nature and size of the proposed project, all environmental topics warranted further environmental review in an EIR. The City circulated over 40 copies of the Notice of Preparation (NOP) for the World Logistics Center EIR to state, regional, and local agencies, and nine

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copies to owners of adjacent properties on February 26, 2012, for a 30-day review period.¹ The NOP was distributed to the State Clearinghouse, as well as agencies and organizations that may provide comment on the proposed project as well as the potential environmental impacts that may result from the construction and operation of the proposed on-site uses.

Comments received regarding the NOP were used to help identify impacts that could result from implementation of the proposed project. The City received 27 comment letters to the NOP and six comment cards from the public Scoping Meeting. In addition, 30 individuals spoke at the Scoping Meeting. The NOP and comment letters received regarding the NOP are included in Appendix A of the EIR. Table 2.A provides a brief summary of NOP comment letters, Table 2.B lists City-identified issues from the scoping process, and Table 2.C lists Senate Bill (SB) 18 Native American consultation contacts.

Table 2.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments*	Addressed in Section(s) of the EIR
Governor's Office of Planning and Research	2/22	Scott Morgan. This letter acknowledges receipt of the NOP and identified the 30-day review period (2/22–3/22). OPR issued State Clearinghouse No. 2012021045	(2.0) Introduction
California Department of Transportation (Caltrans)	2/29	Daniel Kopulsky. Must prepare a traffic impact study according to the Caltrans' Guide for the Preparation of Traffic Impact Studies. Also must prepare a drainage study and identify impacts to state drainage facilities. Existing capacity of the state drainage systems cannot be exceeded.	(4.15) Traffic
California Native American Heritage Commission (NAHC)	3/7	Dave Singleton. NAHC Sacred Lands File did not identify any resources within project area, but did list the following local tribes: Pechanga Band; Ramona Band; Santa Rosa Band; Morongo Band; San Manuel Band; Serrano Nation; Cahuilla Band; and Soboba Band (see Table 2.C).	(4.5) Cultural
Morongo Band	2/22	Franklin Dancy. Tribe indicated site was in its traditional use area and requested to be notified if human remains are found and the Morongo Band is determined to be the Most Likely Descendant, or if Native American artifacts are found during excavation/grading. They also requested that they be consulted if a Treatment Plan is needed for significant cultural resources on site.	(4.5) Cultural
Pala Tribe	3/8	Shasta Gaughen, Ph.D. Determined project was outside of traditional tribal area.	(4.5) Cultural
California Department of Fish and Wildlife (CDFW)	3/22	Jeff Brandt. EIR should address County's MSHCP, the San Jacinto Wildlife Preserve (SJWP), State jurisdictional areas and permitting, water resources, greenhouse gases, direct, indirect, and cumulative biological impacts.	(4.4) Biology (4.9) Hydrology
California Department of Parks and Recreation	3/21	Ron Krueper. Concerned about impacts to Lake Perris State Recreational Area to southwest. Also must evaluate MSHCP and keeping Davis Road closed to traffic.	(4.4) Biology (4.14) Services
Southern California Association of Governments (SCAG)	3/19	Jacob Lieb. Encouraged EIR to use data from Regional Transportation Plan (RTP) for jobs, housing, and employment. Project is regionally significant.	(4.10) Land Use (4.13) Population & Housing

¹ The Notice of Preparation 30-day public review period was from February 25 to March 26, 2012. City of Moreno Valley.

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Table 2.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments*	Addressed in Section(s) of the EIR
South Coast Air Quality Management District (SCAQMD)	3/23	Ian MacMillan. All air quality studies need to provide actual CalEEMod files, and evaluate construction and occupancy impacts for criteria pollutants, LSTs, Health Risk Assessment, dust (PM ₁₀ and PM _{2.5}), and use Western Riverside Council of Governments (WRCOG) “Good Neighbors” guidelines for distribution centers.	(4.3) Air Quality
Eastern Municipal Water District (EMWD)	3/22	Joseph Lewis. Need to address water resources.	(4.9) Hydrology (4.16) Utilities
Sierra Club, San Gorgonio Chapter, Moreno Valley Group	3/26	George Hague. EIR needs to address environmental justice and notices should be in Spanish. Also NOP insufficient and public needs more time to review. Need to evaluate SJWP, MSHCP, loss or transfer of 7,700 housing units elsewhere in the City from loss of Moreno Highlands project, local and regional traffic impacts, air quality impacts on wildlife, especially diesel particulates. Trails, LEED certification, transit, alternative access, rail, March Inland Port, infrastructure, loss of logistics from Panama Canal expansion, impacts to existing onsite homes, possible truck stop, “toxic” runoff, groundwater, Water Supply Assessment, green-solar design, 90% offsets with Tier III trucks, loss of agricultural land, raptors and foraging land, parking, alternative fuels, truck routes through the City, noise barriers during construction, burrowing owls, greenhouse gases, global climate change effects, and reasonable range of alternatives. Suggested references.	(2.0) Introduction (3.0) Project Description (4.1) Aesthetics (4.2) Agriculture (4.3) Air Quality (4.4) Biology (4.5) Cultural (4.6) Geology (4.7) Greenhouse Gases (4.8) Hazards (4.9) Hydrology (4.10) Land Use (4.12) Noise (4.13) Population & Housing (4.14) Services (4.15) Traffic (4.16) Utilities (5.0) Other Topics (6.0) Alternatives
Friends of San Jacinto Valley	3/22	Tom Paulek. Concerned about CDFW land and impacts to SJWP and MSHCP analysis.	(4.4) Biology (4.9) Hydrology
San Jacinto Valley Wetlands Foundation	3/19	Michael Marshall. Impact of lights and diesel pollutants on SJWP, also noise and human disturbance too. Traffic, runoff and water quality, groundwater supplies, water use, and MSHCP analysis.	(4.1) Aesthetics (4.3) Air Quality (4.4) Biology (4.9) Hydrology (4.15) Traffic (4.16) Utilities (water)
Residents for a Livable Moreno Valley	3/26	Susan Gilchrist. Impacts to employment and income in the City, loss of 7,700 homes, overall EIR process, biology impacts with CDFW land, SJWP, runoff, lighting, buffers for SJWP and Lake Perris, impacts on biology excess runoff, views, traffic, glut of warehouses in the City and region, need jobs diversity, actual number of employees, will it have a truck stop, alternative fuels, and building setbacks.	(2.0) Introduction (3.0) Project Description (4.1) Aesthetics (4.3) Air Quality (4.4) Biology

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Table 2.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments*	Addressed in Section(s) of the EIR
			(4.7) Greenhouse Gases (4.9) Hydrology (4.10) Land Use (4.13) Population & Housing (4.15) Traffic (4.16) Utilities (5.0) Other Topics
James Devlin	3/15	Devlin Eng. Representing Multivac (local property owners). Concerned about truck traffic through residential areas, concentrate trucks onto Theodore Street, use block walls to reduce noise impacts where houses are adjacent, need landscape buffers along Merwin Street and Redlands Boulevard, add lower intensity land uses along west side of project.	(4.1) Aesthetics (4.10) Land Use (4.12) Noise
Michael McCoy	3/21	Need site plan details, not Specific Plan; too vague, need accurate employment projections, seismic impacts, traffic, air quality, rail access, biological resources, drainage, and definition of high cube.	(3.0) Project Description (4.3) Air Quality (4.4) Biology (4.6) Geology (4.9) Hydrology (4.13) Population & Housing
Michael McKibben	3/25	NOP too short. Geologic and seismic constraints (San Jacinto, Casa Loma, and Farm Road Faults), Alquist Priolo earthquake zones, hazards, FEMA flooding, suggested references.	(4.6) Geology and Soils (4.9) Hydrology
Thomas Ketcham	3/12	Supports creation of new local jobs but not at expense of residents and environment. Skechers mainly transferred jobs from Ontario warehouse and Cabazon Outlet Mall. Also concerned that previous project by Highland Fairview (HF), called Aquabella, has cost the City a lot in terms of improvements while HF has not made its required improvements, and commenter is worried HF might do the same thing on this project. City does not need more debt. Project will generate jobs but does not need or want 100% warehouse jobs, need a mix. Already adequate of space and land for more warehouses in southern end of town where they are more appropriate. Also March JPA has space for warehouses too. City services, police, fire, street maintenance, and street landscaping should not be sacrificed “chasing” new jobs and more growth.	(3.0) Project Description (4.13) Population & Housing (4.14) Services (4.15) Traffic (4.16) Utilities (5.0) Other Topics
Ann McKibben	3/26	Aesthetics, open space, lighting on SJWP, Dark Skies, loss of agricultural land, air quality, biology, MSHCP, open space, energy and conservation, greenhouse gas emissions, water quality, land use and planning, noise, recreation, traffic, cumulative, and alternatives.	(4.1) Aesthetics (4.2) Agriculture (4.3) Air Quality (4.4) Biology (4.7) Greenhouse

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Table 2.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments*	Addressed in Section(s) of the EIR
			Gases (4.8) Hazards (4.9) Hydrology (4.10) Land Use (4.12) Noise (4.14) Services (4.15) Traffic (5.0) Other Topics (6.0) Alternatives
Gerald Budlong	3/22	Aesthetics, views, geology and soils, Casa Loma Fault, land use and planning, population and housing, widening of Panama Canal, public services, biology (SJWP), transportation, rail alternatives, and utilities (water and gas lines).	(4.1) Aesthetics (4.3) Air Quality (4.4) Biology (4.10) Land Use (4.14) Services (4.15) Traffic (4.16) Utilities (5.0) Other Topics (6.0) Alternatives
Duncan Bush	3/13	On-site property owner, concerned about local and regional traffic impacts, public services, and cumulative impacts.	(4.13) Population & Housing (4.14) Services
Dave Simpson	3/13	Panama Canal to be expanded so west coast logistics will decline, new warehouses only transfer jobs from other cities (e.g., Skechers project and Ontario).	(3.0) Project Description (4.13) Population & Housing
Joshua Freeman	3/27	Quality of jobs and impacts on schools.	(3.0) Project Description (4.13) Population & Housing (4.14) Services
Ned and Dawn Newkirk	3/21	What will happen to existing homes on site and what will be the traffic impacts?	(4.10) Land Use (4.15) Traffic
Scott Simpson	3/26	Concerned about water use, loss of views, air quality, increased lighting, recreation, biological impacts on SJWP, and economics to City.	(4.1) Aesthetics (4.3) Air Quality (4.4) Biology (4.10) Land Use (4.13) Population & Housing (4.14) Services (4.16) Utilities

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Table 2.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments*	Addressed in Section(s) of the EIR
Ron Roy	ND	Actual jobs (Skechers did not provide the jobs promised). Lease terms, amount of automation, no rail available for logistics, City mostly residential—do we need so much of one kind of employment? Gas costs for freight, traffic impacts (SR-60), changes to job base, visual impacts and loss of open space, and change in City identity.	(3.0) Project Description (4.1) Aesthetics (4.10) Land Use (4.13) Population & Housing (4.15) Traffic
Tom Thornsley	3/25	Air quality, aesthetics, drainage into SJWP, energy and conservation, water quality, land use, population, housing, employment changes, recreation, transportation, utilities, alternatives, and economic impacts.	(4.1) Aesthetics (4.3) Air Quality (4.4) Biology (4.9) Hydrology (4.10) Land Use (4.13) Population & Housing (4.14) Services (4.15) Traffic (4.16) Utilities (6.0) Alternatives
D. and M. Moreno	3/21	Fix local roads, project will reduce property values, air quality, and noise impacts.	(3.0) Project Description (4.1) Aesthetics (4.3) Air Quality (4.12) Noise (4.15) Traffic
Scoping Meeting Comment Cards			
Jaeger Jones	3/12	HF track record proves this project will not benefit City.	
Sandra Williams	3/12	Should consider less polluting projects within the City that still bring jobs; should not count on only warehouses.	(4.3) Air Quality (4.10) Land Use (6.0) Alternatives
Amber Reilly	3/12	Concerned about traffic, air quality, and local owls	(4.3) Air Quality (4.4) Biology (4.15) Traffic
Peggy Hadaway	3/12	Concerned about actual number of new jobs that will be created and air pollution. Need more variety of new jobs, not just warehousing.	(4.3) Air Quality (4.10) Land Use
George Hague (local Sierra Club representative)	3/12	EIR must look at viable alternatives that reduce impacts on SR-60. What will be transitional uses along the project boundaries to minimize impacts on adjacent residents? Need to clearly define “high cube” and project objectives. Scoping meeting is premature before Specific Plan is ready for the public to review. Does developer control all the land within the SP area? Will there be a truck stop and what would be the impacts of that facility? What level of LEED will be achieved? Project will displace not replace 7,700 housing units so this must be analyzed in EIR (i.e., where those units will be transferred to	(3.0) Project Description (4.1) Aesthetics (4.3) Air Quality (4.10) Land Use (4.15) Traffic (6.0) Alternatives

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Table 2.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments*	Addressed in Section(s) of the EIR
		within the City). EIR must look at toxic diesel particulates in addition to “diesel vapors” (term undefined).	
“Residents for a Livable Moreno Valley” Scoping handout from local residents (at meeting)	3/12	Concerned about relocation of existing jobs rather than creating new jobs here, and not very many new jobs as compared to other uses. Existing zoning would generate more jobs, more sales, and higher property taxes. Displacement vs. replacement of 7,700 housing units. East end of Moreno Valley does not have infrastructure to support this amount of new warehouses. Air pollutant impacts to sensitive receptors. Why change zoning here when General Plan and regional planners anticipates new warehouses in southwest portion of City near I-215?	(4.3) Air Quality (4.10) Land Use (4.13) Population & Housing
Arturo Benitez	3/14	Very concerned about the process and that everything be transparent and “published” so all can participate.	(2.0) Introduction
Charles Robinson	3/15	Need to make provisions to hire local employees (i.e., City residents) on a prioritized basis.	(3.0) Project Description (4.13) Population & Housing
Scoping Meeting Comments (in order of presentation)			
Kenny Bell	3/12	EIR needs to show accurate estimate of job creation, not like the Skechers project.	(4.13) Population & Housing
Susan Nash	3/12	State land south of site must be protected. CDFW open space land within project should not count toward open space requirements for project.	(4.4) Biology
Mike McCoy	3/12	Concerned about seismic safety (Casa Loma and San Jacinto Faults nearby). Impacts of warehouses vs. housing vastly higher, global reductions in logistics due to Panama Canal widening and railroad expansions.	(4.6) Geology
Tom Thornsley (2x)	3/12	Should bring railroad spur into site, should not just rely on trucks, no plans to widen SR-60, would take 10–20 years to complete such a widening. Need accurate economic assessment. Localized flooding and project needs buffers for existing residents.	(4.1) Aesthetics (4.9) Hydrology (4.13) Population & Housing (4.15) Traffic
Cathy Godfree	3/12	Need buffers, open space, zero runoff, reduce flooding, so much more asphalt, Skechers did not take care of flooding on Redlands Boulevard as promised. Trucks get off at Redlands Boulevard and try to enter at Eucalyptus Avenue. Trucks park on Redlands Boulevard waiting to enter project block traffic. Will there be a truck stop? Will need big setbacks to not block views off Merwin Street and Bay Avenue	(4.1) Aesthetics (4.9) Hydrology (4.15) Traffic
Andrew Jones	3/12	Skechers is a nice project, new ones should also be attractive, low water use and runoff.	(4.1) Aesthetics (4.9) Hydrology
Nanette Bartenee	3/12	On board of “Friends of San Jacinto Valley” SJWP is world-famous raptor habitat. Need good alternatives analysis for regional impacts.	(4.4) Biology (6.0) Alternatives
Frank Wright	3/12	Need more jobs but this project will generate a lot of traffic and will need to widen freeways.	(4.13) Population & Housing (4.15) Traffic

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Table 2.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments*	Addressed in Section(s) of the EIR
Ian McMillian (SCAQMD)	3/12	Works for SCAQMD. Project represents 25% of all planned warehouse space in region, big concern about diesel particulates and other pollutants. He would like to work with developer regarding alternative fuels for trucks.	(4.3) Air Quality (4.7) Greenhouse Gases
Rick Tendell (2x)	3/12	Need environmental design studies (compressed natural gas, hydrogen fuel cells, solar, etc.). Maybe even fuel trucks.	(4.7) Greenhouse Gases
Jim Randonoth	3/12	Skechers laid off 600 people in Ontario when it opened, what will all these projects do to regional employment?	(4.13) Population & Housing
Peggy Hadaway	3/12	Our Quality of Life will deteriorate from more warehouses. Need to bring in more varied employment and is concerned about air pollution.	(4.3) Air Quality (4.13) Population & Housing
Dave Slawson	3/12	Air quality, traffic, groundwater, noise	(4.3) Air Quality (4.9) Hydrology (4.12) Noise (4.15) Traffic
John Escobell	3/12	Need to offer some program for local hiring first.	(4.13) Population & Housing
Cody Muser	3/12	Project needs to be Gold LEED certified.	(4.7) Greenhouse Gases
Tom Thornsley	3/12	SP needs to come out with EIR. Need building plans to be able to estimate impacts to local residents.	(2.0) Introduction
Deanna Reader	3/12	Need an unbiased evaluation of impacts. Traffic will be massive, Skechers was poor first example. Keep traffic on Theodore. Panama Canal expansion will change west coast logistics needs, port at capacity.	(2.0) Introduction (4.13) Population & Housing (4.15) Traffic
George Hague (4x)	3/12	EIR must look at viable alternatives that reduce impacts on SR-60. What will be transitional uses along the project boundaries to minimize impacts on adjacent residents? Need to clearly define "high cube" and project objectives. Scoping meeting is premature before Specific Plan is ready. Does developer control all the land within the SP area? Will there be a truck stop and what would be the impacts of that facility? What level of LEED will be achieved? Project will displace not replace 7,700 housing units so this must be analyzed in EIR (i.e., where those units will be transferred to within the City). EIR must look at toxic diesel particulates in addition to "diesel vapors" (term undefined).	(3.0) Project Description (4.1) Aesthetics (4.3) Air Quality (4.10) Land Use (4.15) Traffic (6.0) Alternatives
Lorenzo Fiero	3/12	Alessandro already has lots of trucks and is half destroyed. Other streets have lots of potholes, flooding; this end of the City has poor public services. What will happen with construction and (even worse) project trucks operating on local streets?	(4.9) Hydrology (4.15) Traffic
Dawn Luoker	3/12	Local employment, traffic impacts on local streets to west, must involve Caltrans, need to see plans, also what about the results of the "community survey?" (Note: did not identify what survey.)	(2.0) Introduction (4.13)

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Table 2.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments*	Addressed in Section(s) of the EIR
			Population & Housing (4.15) Traffic
Dan Newkirk	3/12	Must identify impacts on properties within the project (houses).	(3.0) Project Description (4.10) Land Use (4.13) Population & Housing
Brad Singer	3/12	With SoCal Audubon Club. Need to look at short- and long-term impacts of project, especially for local wildlife and SJWP, with gyre falcons and other raptors.	(4.4) Biology
Chris (no last name provided)	3/12	City needs growth and project will have to comply with all the various state environmental laws. Need to plan for our kids and grandkids.	(2.0) Introduction (5.0) Other Topics
Craig Gibbons	3/12	Need 1 mile buffer between project and habitat. Need to plan well because this is the last largest undeveloped part of City.	(4.4) Biology
Raul Wilson	3/12	14.5% unemployment, City needs jobs. Skechers took 3 years to approve, 18 months to build, need what's good for local residents and workers.	(4.13) Population & Housing
Lori Nickels	3/12	Area has historical significance. In 1775 Juan Bautista de Anza came by Mystic Lake and Juan Bautista National Trail runs nearby. Need to contact National Park Service. Served 13 years on RCTC, no way you will get a rail spur out here.	(4.5) Cultural (4.14) Services (4.15) Traffic
Tom Gerald	3/12	Was on original General Plan committee, SJWP is a national treasure and project needs to be compatible.	(4.4) Biology
Chris Bauk	3/12	Project will provide jobs; maybe now can take Davis Road south to Ramona Parkway.	(4.4) Biology (4.15) Traffic
Lacy Sikes	3/12	Unemployment equals crime so this project will help.	(4.14) Services
Marshall Scott	3/12	Wants to see more detailed plans; sad to see whole area agriculture lost since early days.	(4.2) Agriculture
Lewis Miramontes	3/12	Need to protect Old Moreno, houses along Redlands Boulevard, on Merwin Street, and Bay Avenue, etc. Need to keep employment local.	(4.10) Land Use (4.13) Population & Housing

* Notes: All NOP response letters are included in Appendix A of the EIR.
 GHG = greenhouse gases
 HF = Highland Fairview (project applicant)
 LEED = Leadership in Energy and Environmental Design
 MSHCP = Western Riverside County Multiple Species Habitat Conservation Plan
 ND = No Date
 NOP = Notice of Preparation
 RTP = Regional Transportation Plan (SCAG)
 SJWP = San Jacinto Wildlife Preserve
 WSA = water supply assessment

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Table 2.B: City-Identified Issues from Scoping Process

Issue	Addressed in Section(s) of the EIR
1. Number of jobs anticipated by the project; provide an independent analysis.	(4.13) Population & Housing
2. Identify impacts on local unemployment, including skill levels required.	(4.13) Population & Housing
3. Seismic safety related to the Casa Loma and San Jacinto fault lines.	(4.6) Geology
4. Impacts of current land use plan versus the proposal.	(4.10) Land Use
5. Potential impact of railroad and Panama Canal expansions on local demand for logistics.	(3.0) Project Description
6. Clear explanation of “high cube warehouse.”	(3.0) Project Description
7. Identify potential for rail spur to serve project.	(4.15) Traffic
8. Provide an economic assessment of the project (fiscal/cost benefit analysis)	(4.13) Population & Housing
9. Identify flooding impacts before and after project.	(4.9) Hydrology
10. Provide buffers to adjacent housing and wildlife areas.	(4.4) Biology
11. Do not use existing permanent open space as buffer.	(4.4) Biology
12. Identify impact on viability of adjacent residential areas with logistics adjacency.	(4.10) Land Use
13. Include list of other uses allowed in addition to logistics, and their impacts.	(4.10) Land Use
14. Include manufacturing and high tech as permitted uses.	(3.0) Project Description (4.10) Land Use
15. Impacts on views from Moreno neighborhood.	(4.1) Aesthetics
16. Include description of “net zero storm water treatment” and implementation.	(4.9) Hydrology
17. Potential for trucks to exit onto Redlands and need to turn around to access project.	(4.15) Traffic
18. Provide alternatives for waiting trucks rather than parking on off ramps and local streets.	(4.15) Traffic
19. Provide “solid” alternatives analysis to provide viable options.	(6.0) Alternatives
20. Include requirement for solar panels on building roofs.	(4.7) Greenhouse Gases
21. Include assessment on regional air quality including criteria pollutants.	(4.3) Air Quality
22. Work with SCAQMD on implementation of new truck technologies to reduce emissions.	(4.3) Air Quality
23. Identify air quality impacts specifically on children, elderly residents, and wildlife.	(4.3) Air Quality
24. Identify diesel emission impacts on workers in project area.	(4.3) Air Quality
25. Provide impact on wildlife by species.	(4.4) Biology
26. Identify light and noise impacts on wildlife area.	(4.4) Biology
27. Identify impact on groundwater.	(4.9) Hydrology
28. Identify noise impacts.	(4.12) Noise
29. Identify specific green technologies to be included in project.	(3.0) Project Description (4.7) Greenhouse Gases
30. Include potential for use of CNG, hydrogen fuel cell, solar electricity to supply trucks.	(4.7) Greenhouse Gases
31. Identify amount of traffic on local roads, specifically truck traffic.	(4.15) Traffic
32. Identify impacts on Alessandro pavement quality.	(4.15) Traffic

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Table 2.B: City-Identified Issues from Scoping Process

Issue	Addressed in Section(s) of the EIR
33. Include potential diversion of truck traffic from Alessandro.	(4.15) Traffic
34. Identify impacts on wildlife, including owls and other raptors.	(4.4) Biology
35. Identify globally significant raptor habitat & impacts on grazing areas within project area.	(4.4) Biology
36. Identify impact on public services and funding.	(4.14) Services
37. Provide a comprehensive plan for review prior to completing environmental.	(3.0) Project Description
38. Identify all public improvements, including parks, to be provided by project.	(4.14) Services
39. Identify all impacts on current residents within project area.	(4.10) Land Use
40. Identify any use of roadways through the adjacent wildlife area.	(4.4) Biology
41. Identify where 7,700 housing units currently planned for project area will be replaced.	(4.13) Population & Housing
42. Identify traffic impact of relocated planned housing units.	(4.13) Population & Housing (4.15) Traffic
43. Impacts on route and historic views from Juan Bautista de Anza 1775 exploration.	(4.14) Services (trails)
44. Contact National Park Service related to Juan Bautista de Anza trail impacts.	(4.14) Services (trails)
45. Identify impact on crime rates.	(4.14) Services (police)

Source: Memo from John Terrell, March 13, 2012

Table 2.C: SB 18 Native American Consultation Contacts

Agency/Tribe	Date¹	Comments	Desire to Consult?
California Native American Heritage Commission (NAHC)	2/28	City notified NAHC that they would be contacting local tribes that may have an interest in this project. City has contacted these tribes and awaits reply during the SB 18 consultation period (90 days – ends May 30 - see Appendix A).	—
	3/7	NAHC sent letter requesting City contact local tribes and provided tribal contacts.	
	4/9	NAHC sent a second letter with a list of tribes and tribal representatives to contact.	
Cahuilla Tribe	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	4/19	Tribe sent letter requesting consultation.	
Los Coyotes office	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	—	No response from tribe within the 90-day noticing period.	
Morongo	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	2/22	Tribe sent letter providing information to be included in the EIR but did not request consultation.	
	10/2	City sends additional letter regarding consultation.	
Pala Band	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	3/8	Tribe sent letter indicating site was outside of Traditional Tribal Area and deferred to tribes in closer proximity.	
Pechanga	2/29	City letter asking if tribe wished to consult on the WLC project.	Yes

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Table 2.C: SB 18 Native American Consultation Contacts

Agency/Tribe	Date ¹	Comments	Desire to Consult?
	3/16	Tribe sent letter providing information on cultural resources in the area, suggested mitigation language for EIR, and requested consultation on the project.	
	5/30	City met on site with tribe to consult regarding project activities.	
	10/2	City sends additional letter on consultation and EIR process.	
Ramona Band	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	4/19	City sent consultation notification reminder to tribe. No response received from tribe within the 90-day noticing period.	
Rincon Band of Luiseño Indians	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	3/23	Tribe sent letter indicating site was not within the historic boundaries of the tribe, and referred the City to the Soboba Band of Luiseno Indians for further comment.	
San Manuel	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	4/19	City sent consultation notification reminder to tribe. No response received from tribe within the 90-day noticing period.	
Santa Rosa	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	4/19	City sent consultation notification reminder to tribe. No response received from tribe within the 90-day noticing period.	
Serrano Nation	2/29	City letter asking if tribe wished to consult on the WLC project.	No
	4/19	City sent consultation notification reminder to tribe. No response received from tribe within the 90-day noticing period.	
Soboba	2/29	City letter asking if tribe wished to consult on the WLC project.	Yes
	4/16	Tribe sent letter with input on EIR regarding cultural resources.	
	4/19	City sent follow-up letter again to verify tribe's desire to consult.	
	4/30	Tribe sent follow-up letter again requesting consultation.	
	10/2	City sends letter discussing consultation and EIR process.	
	10/8	Tribe wants to be present during ground disturbing activities.	
	11/27	City met on site with tribe consult regarding project activities.	

Source: City Planning Department 2012 records on tribal correspondence (see DEIR Appendix A)

¹ NOP notices mailed February 21 so some tribes were responding to that notice before they received official SB 18 notice.

SB 18 Consultation. It should be noted that the city met with the Pechanga Tribe on May 30, 2012, and with the Soboba Tribe on November 27, 2012. No other Native American entities requested a government-to-government consultation meeting.

2.6.2 Public Scoping Meeting

A public Scoping Meeting was held at the City of Moreno Valley City Hall in the City Council Chambers on March 12, 2012, 6:00 p.m. There was one agency staff representative (from the Air Quality Management District) and over 150 individual members of the public in attendance. City staff and the developer briefly described the project, and then comments from the public were solicited. Local residents brought up essentially every major environmental concern, including traffic, truck traffic, air quality, noise, loss of views, and impacts to the nearby wildlife area. Copies of the written

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scoping comment forms are included in Appendix A and a list of commenters is provided as part of previously referenced Table 2.A.

2.7 MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) will be prepared for this EIR to comply with the requirements of State law (Public Resources Code Section 21081.6). When mitigation measures are required to avoid or reduce the severity of significant impacts, State law requires the adoption of an MMRP. The monitoring program is intended to ensure compliance during implementation of the program. An MMRP will be adopted by the City Council concurrent with certification of the Final EIR for the proposed WLCSP project. A copy of the MMRP, revised to reflect all changes in the DEIR that resulted from changes in the project description, technical studies, and response to comments on the DEIR, is included in the Final EIR Volume 1 Response to Comments.

2.8 POTENTIAL IMPACTS OF THE PROJECT DISCUSSED IN THE EIR

This EIR focuses on the areas of concern identified in the NOP and comments submitted regarding the NOP. The following sixteen environmental topics are addressed in this EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality, including Human Health
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions, Energy Conservation, and Global Climate Change
- Hazards and Hazardous Materials
- Hydrology, and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population, Housing, and Employment
- Public Services and Facilities
- Transportation and Traffic
- Utilities and Service Systems

2.9 EFFECTS FOUND NOT TO BE SIGNIFICANT

As required under CEQA (Section 15128), an EIR is to contain a statement supporting the Lead Agency’s determination that some of the possible effects of a project are not significant and, therefore, are not discussed in detail in the EIR. In this case, the proposed project is not consistent with the City’s General Plan or the currently approved Moreno Highlands Specific Plan and the respective EIRs prepared for each. Due to the size and scope of the project, the City determined that all potential environmental issues outlined above would be evaluated in this EIR. Section 4.0 of the EIR determined that only mineral resources and forest resources would not be significantly affected by the proposed project.

2.10 CUMULATIVE IMPACTS

2.10.1 Definition of Cumulative Impact

CEQA defines cumulative effects as “two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts.” (*State CEQA Guidelines* Section 15130). The *Guidelines* further state that the individual effects can be the various

changes related to a single project or the changes involved in a number of other closely related past, present, and reasonably foreseeable future projects (Section 15335). Substantial changes are anticipated to occur as the result of warehousing and employment growth of the proposed project, as well as growth in population, housing, and employment from development of other projects in the City of Moreno Valley and the surrounding region. Section 15130 of the *State CEQA Guidelines* requires that an EIR include a discussion of the potential cumulative impacts of a proposed project. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period of time.

With respect to the analysis of cumulative impacts, CEQA generally requires the following:

- (a) *Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.*
- (b) *The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.*

Pursuant to *CEQA Guidelines*, Section 15130, the assessment of cumulative impacts contained in EIRs is typically based on either: (i) past, present, and probable future projects, which are either approved or being considered for approval by the City or other municipalities (or anticipated to be submitted for consideration, including projects in the design phase or under construction); or (ii) growth projections set forth in regional plans, including regional modeling plans.

Due to the size of the proposed project and its potential future new land use and employment implications for the City, the cumulative analysis for this EIR will use the City's General Plan growth projections. It is expected that the cumulative impact analysis set forth in this EIR will be conservative and would tend to overstate (rather than understate) cumulative impacts.

The significance of a cumulative impact may be greater than the effects resulting from the individual actions if the effects of more than one action are additive. Thus, as set forth above, this section evaluates the proposed project together with (i) the reasonably foreseeable potential effects of other closely related past, present, and reasonably foreseeable or probable future development in the area of the project, and (ii) growth projections set forth in regional plans.

Criteria for evaluating the significance of adverse effects are identified for each environmental issue in Section 4.0. These criteria, which are based on resource sensitivity, quality, and quantity, are also instructive when evaluating whether the environmental effect resulting from implementation of a particular project is cumulatively considerable. The timing and duration of each activity is also an important consideration for evaluating the potential cumulative effects of activities that may occur only for a limited period. In such cases, a cumulative effect may occur only when two or more of the activities are occurring simultaneously.

Because of the nature of individual environmental factors, the cumulative "universe" for every issue addressed in this EIR will not be identical. For example, the cumulative universe for air quality impacts is reasonably assumed to be the entire South Coast Air Basin, which is much larger than the cumulative universe for public service impacts (i.e., the service area of the various service providers.) The individual cumulative areas for the issues addressed in this EIR are provided within the cumulative impacts discussion in the respective impact sections, but range from the City of Moreno Valley to the County to the entire SCAG region when necessary.

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To summarize, in determining the cumulative impacts of a proposed project with other area projects, the *CEQA Guidelines* provide that an EIR may either consider a list of past, present, and probable future projects, or it may consider a summary of projections method. This EIR utilizes the summary of projections method due to the size of the project and its growth implications for the City as a whole.

2.10.2 City of Moreno Valley Growth Projections

The Moreno Valley General Plan establishes policies to guide future development within the City and its implementation is long-term in nature. The Regional Growth Projections Method is the appropriate methodology in evaluating cumulative impacts because it provides general growth projections for the region and considers long-term growth. Table 2.D summarizes the cumulative growth information from the Final Program EIR for the City General Plan Update from July 2006 (Section 7, *Cumulative Impacts*). Table 2.D shows that the City expects to grow at an average annual rate of 2–3 percent from 2000 to 2030, with a population at that point of 238,703 persons and 71,619 households. The City will comprise approximately 7 percent of the County’s population and housing stock at that time.

Table 2.D: General Plan Growth Projections for Moreno Valley (2000–2030)

Jurisdiction	Population		Households	
	2000	2030	2000	2030
City of Moreno Valley	142,655	238,703	39,264	71,619
Average Annual Increase	—	+2.24%	—	+2.75%
Riverside County	1,850,231	3,143,468	509,311	1,127,780
Average Annual Increase	—	+2.33%	—	+4.05%
City (Percent of County)	7.7%	7.6%	7.7%	6.4%

Sources: SCAG, 2008 RTP Growth Forecast, Table 7-1, General Plan Final EIR, Section 7.0, Cumulative Impacts.

2.10.3 Regional Growth Projections

The SCAG estimates regional growth for the Riverside County area for the purposes of planning and public policy development. The most recent set of growth projections are provided in the most recent *Regional Transportation Plan (RTP) Growth Forecast*, based on extensive analyses of the regional economic and demographic conditions. The *Draft 2012 RTP Growth Forecast* provides estimates and forecasts of employment, population, and housing for the period between 2011 and 2035. Consistent with the projections shown in previously referenced Table 2.D, Table 2.E shows that the population, housing, and employment of the City are expected to increase consistent with overall regional trends for that period (i.e., approximately 2–3% per year).

According to SCAG projections, the population of Moreno Valley is expected to increase by about 60,749 persons or approximately 31.2 percent between 2011 and 2035 to approximately 255,200 persons. By comparison, the population of Riverside County is projected to increase by 1.1 million persons or approximately 50 percent between 2011 and 2035 to approximately 3,324,000 persons. The number of households is estimated to increase approximately 30.9 percent in Moreno Valley and 35.7 percent in Riverside County over this same time period.

The number of jobs in Moreno Valley is estimated to increase by approximately 156 percent from 2011 to 2035. Over this same time period, jobs in Riverside County are expected to increase by 125 percent. At present, Moreno Valley has a relatively low jobs-to-housing ratio of 0.45 compared to the overall regional ratio of 1.14 (i.e., 1.14 jobs for each 1 housing unit). SCAG’s Compass Blueprint Plan and the Regional Transportation Plan encourages “bedroom” communities (i.e., those with more housing than jobs) to encourage jobs growth instead of housing growth, which will eventually help

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balance these factors across the region and help reduce commuter traffic. These plans forecast that the City's ratio of jobs to housing will increase in the future but will still be less than 1.0 (estimated 0.89 by 2035), compared to a projected ratio of 1.14 for the County and 1.29 for the entire SCAG area. The City's jobs/housing ratio is expected to still be less than 1.0 by 2035, but to achieve that ratio, the City would need to attract over 34,000 jobs in the next 20 years, compared to attracting 17,000 new houses during that same period.

Table 2.E: Regional Population, Housing, and Employment Forecasts through 2035

Forecast Category	2011	2020	2035
Population			
City of Moreno Valley	194,451 ⁶	213,700	255,200
Riverside County	2,205,731 ⁶	2,592,000	3,324,000
SCAG	18,163,664	19,663,000	22,091,000
Housing Units			
City of Moreno Valley	55,635	60,000	72,800
Riverside County	804,913	834,000	1,092,000
SCAG	6,348,741	6,458,000	7,325,000
Employment			
City of Moreno Valley	25,120 ⁵	48,000	64,400
Riverside County	551,492 ⁵	939,000	1,243,000
SCAG	7,224,670	8,414,000	9,441,000
Jobs/Housing Ratio			
City of Moreno Valley	0.45	0.80	0.89
Riverside County	0.69	1.13	1.14
SCAG	1.14	1.30	1.29

Sources:

- (1) 2010 Employment is based on 2010 data presented in *Profile of the City of Moreno Valley*, Southern California Association of Governments, May 2011.
- (2) *Draft 2012 RTP Growth Forecast*, Southern California Association of Governments, <http://www.scag.ca.gov/forecast/index.htm>, date accessed March 15, 2012.
- (3) *Table 2: City/County Population and Housing Estimates, 1/1/2011*, State of California Department of Finance.
- (4) *Table 1: Population, Age and Sex Characteristics, April 1, 2010, Incorporated Cities and Census Designated Places (CDP) by County in California*. State of California, Department of Finance, Sacramento, California, May 19, 2011.
- (5) 2011 Employment data for the City and County is based on the California Employment Development Department, Labor Market Information Division, as reported by *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California*, December 11, 2013.
- (6) *2011 Employment and Housing data for City and County based on the E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011–2013, with 2010 Benchmark*, State of California Department of Finance, <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>, website accessed February 7, 2014.

2.10.4 Analysis of Cumulative Impacts

The analysis of each environmental issue or topic (EIR Sections 4.1 through 4.16) also discusses the cumulative impacts of the proposed project. Implementation of the mitigation measures identified in each specific section of this EIR will reduce the cumulative impact of the project to the extent feasible. In many cases, the mitigation measures result in reducing the project's cumulative impact to a less than significant level. For other impacts, the implementation of the identified mitigation measures will not avoid a significant cumulative impact. The sixteen subsections of Section 4.0 (i.e., 4.1 through 4.16) identify those significant, unavoidable cumulative impacts that will not be reduced to a less than significant level by implementation of the identified mitigation measures presented in each of those sections. In addition, the analyses indicate to what degree the project makes a significant contribution

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to cumulatively considerable impacts for each environmental issue (air quality, biological resources, etc.).

It should be noted that the project Traffic Impact Assessment developed an extensive list of cumulative projects to more accurately estimate potential traffic impacts over time on local roadways and intersections (see Section 4.15, *Transportation*).

NOTE TO READERS. *A number of comments were raised on the Draft EIR about the validity of the growth projections used as the basis for the assessment of cumulative impacts of the WLC project. Some comments referred to a number of General Plan Amendments the City had approved since the last General Plan Update. In addition, some comments stated that the General Plan did not account for recent approvals of several warehouse projects, both within the City and in other nearby jurisdictions. However, the City's General Plan was updated in 2006, and SCAG's Regional Transportation Plan (RTP) was last updated in May 2008, although the Growth Forecasts that accompany the RTP were last updated in 2012 (Draft 2012 RTP Growth Forecast, Southern California Association of Governments, March 15, 2012). Both of these do constitute current applicable local and regional planning documents upon which to base the analysis of cumulative impacts in the programmatic WLCSP EIR. Therefore, there are no changes to the growth projections that are the basis for the cumulative impact analysis in this EIR.*

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plan 73

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NOTE TO READERS: *The original Specific Plan was prepared in December 2012 and was analyzed in the Programmatic Draft EIR that was circulated for public review from February 4 to April 8, 2013. In response to comments received on the public review of the DEIR, the Specific Plan was revised to change the Specific Plan boundary resulting in a loss of 100 acres and 1 million square feet of potential development. In addition, the phasing was extended from ten to fifteen years so Phase 1 is from 2015 to 2022 and Phase 2 is 2023 to 2030 instead of the project completing development in 2022 as analyzed in the original DEIR. Changes to the Project Description are shown in double underline for added text and in strikeout for text to be deleted, plus notes about the reasons for the various changes. The revised figures are included in this section rather than the original figures to provide the most accurate project information for the reader.*

3.0 PROJECT DESCRIPTION

The project description is provided in this section of the EIR in conformance with *CEQA Guidelines* Section 15124. It discusses the geographic setting, project location, project setting, City of Moreno Valley General Plan designations, World Logistics Center (WLC) Specific Plan designations, zoning designations, project characteristics, project objectives, and discretionary actions required to implement the proposed project. The project description is used as the basis for analyzing the proposed project's impacts on the existing physical environment in Section 4.0 of the EIR.

The term "World Logistics Center Project" refers to all related development and planning activities currently proposed by Highland Fairview in the Rancho Belago area of the eastern end of the City of Moreno Valley. The WLC property is generally located south of SR-60, east of Redlands Boulevard, west of Gilman Springs Road, and north of Mystic Lake and the San Jacinto Wildlife Area. The terms "Project Site" or "Project Area" refer to the entire 3,714-acre area covered by the project entitlements, which encompasses: (a) the General Plan Amendment and the Zone Change (including the revised WLC Specific Plan Area (2,610 acres); (b) the CDFW Conservation Buffer Area (910 acres); and (c) the Public Facilities Lands area (194 acres). Additional acreage that was evaluated in the EIR but that is not in the Project Area is the Off-site Improvement Area of 104 acres. See Section 3.4 for more details on these specific areas.

3.1 PROJECT LOCATION

The project is located in "Rancho Belago," the eastern portion of the City of Moreno Valley, in northwestern Riverside County. The project site is immediately south of SR-60, between Redlands Boulevard and Gilman Springs Road (the easterly city limit), extending to the southerly city limit. Figure 3.1 depicts the location of the proposed project within the region and the City of Moreno Valley. The major roads that currently provide access to the project site are Redlands Boulevard, Theodore Street, Alessandro Boulevard, and Gilman Springs Road.

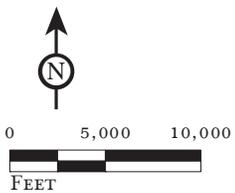
The WLC project area is located in portions of Sections 1, 12, and 13 of Township 3 South, Range 3 West; and portions of Sections 6, 7, 8, 9, 16, 17, 18, 19, 20, and 21 of Township 3 South, Range 2 West, as depicted on the U.S. Geological Survey (USGS) 7.5-minute series *Sunnymead* and *El Casco, California* quadrangles. Figure 3.2 depicts the proposed project boundary on the applicable USGS quad sheets.

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FIGURE 3.1

LSA



World Logistics Center Specific Plan Project
Environmental Impact Report

Regional Location

SOURCE: USGS DEM; Thomas Bros, 2009

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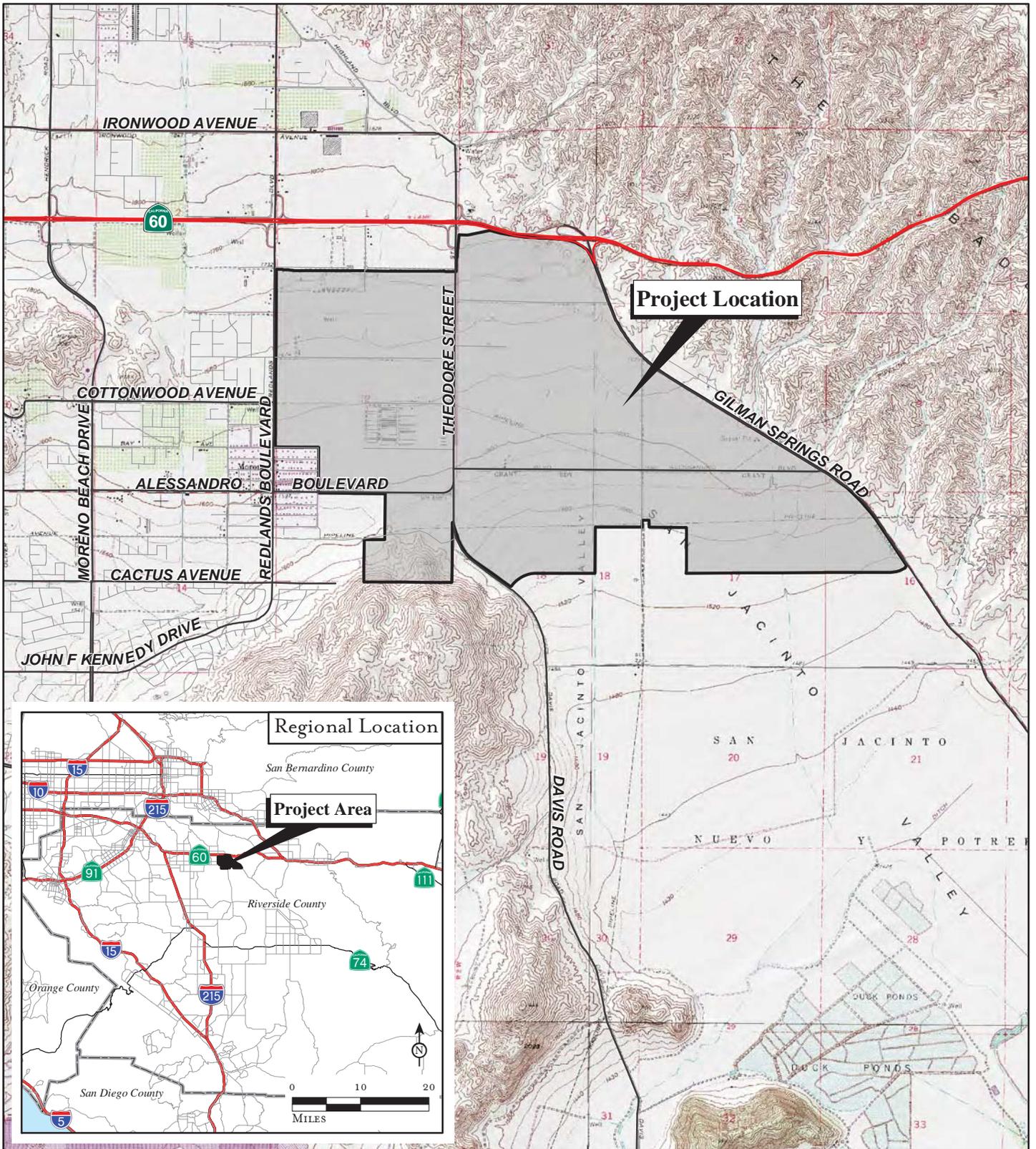
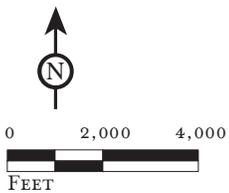


FIGURE 3.2

LSA



World Logistics Center Specific Plan Project
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Regional and Project Location

SOURCE: USGS 7.5' Quads: El Casco, Lakeview and Perris (1979), Sunnymead (1980), CA; Riverside County, 2011.

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3.2 PROJECT SETTING AND HISTORY

3.2.1 Project Setting

The project site slopes gently (approximately 2%) from north to south, with elevations ranging from approximately 1,760 feet above mean sea level (amsl) at the northeast corner to 1,480 feet amsl at the southeast corner. Soils within the proposed project consist of disturbed top soil and natural soils, with a mixture of various silty clays, sandy silts, silty sands, and sands.

3.2.2 On-site Land Uses

The project area is largely vacant undeveloped marginal agricultural land, with seven occupied single-family homes and associated ranch/farm buildings in various locations on the property. In the 1920s, several farm buildings and related houses were constructed on the property and, in the 1940s, a stock farm operated on a portion of the site that was later expanded into a commercial horse farm and training facility that operated until the mid-1990s. The overall project site has been farmed by a variety of owners since the early 1900s and has supported dry (non-irrigated) farming, livestock grazing, and limited citrus groves. Much of the site continues to be used for dry farming today.

San Diego Gas & Electric (SDG&E) operates a natural gas compressor plant, known as the Moreno Compressor Station, on 19 acres in the south-central portion of the site. The Southern California Gas Company (SCGC) operates a metering and pipe cleaning station on two separate parcels (totalling 1.5 acres) in the south-central portion of the site south of Alessandro Boulevard along existing Virginia Street. The site contains a variety of overhead and underground utility lines associated with oil, natural gas, and electrical service.

At present, the project site contains a number of unimproved drainage features, but it does not contain any improved flood control facilities. As Figure 3.3 illustrates, the project vicinity is largely vacant agricultural land with scattered utility facilities and seven rural residential properties.

3.2.3 Surrounding Land Uses

Developed properties in the vicinity include a logistics building to the northwest (Skechers) and several residential neighborhoods along Redlands Boulevard along the western boundary of the project site. An area of the City known as “Old Moreno” is situated near the southwest portion of the project site, around the intersection of Redlands and Alessandro Boulevards. The homes along Bay Avenue, Merwin Street, and Redlands Boulevard constitute the closest off-site “sensitive receptors” to the project site (i.e., they are across the street from the property). Figure 3.3 shows the land uses on and around the project site.

The major roadways that currently provide access to the project area are SR-60 to the north, Redlands Boulevard to the west, Alessandro Boulevard (which traverses the site east-west), Gilman Springs Road to the east, and Theodore Street (which traverses the site north-south). Redlands Boulevard and Theodore Street are north-south arterial roadways that intersect with SR-60. Alessandro Boulevard is an east-west thoroughfare that runs through Moreno Valley from Interstate 215 (I-215) on the west to Gilman Springs Road on the east. Gilman Springs Road runs northwesterly-southeasterly connecting SR-60 to the Hemet-San Jacinto area.

Highland Fairview Corporate Park (HFCP) is located northwest of the project area between Redlands Boulevard and Theodore Street. It is currently under development and the first phase was completed in late 2011 (i.e., the Skechers logistics warehouse). The area north of SR-60 is largely undeveloped with clusters of low-density residential development.

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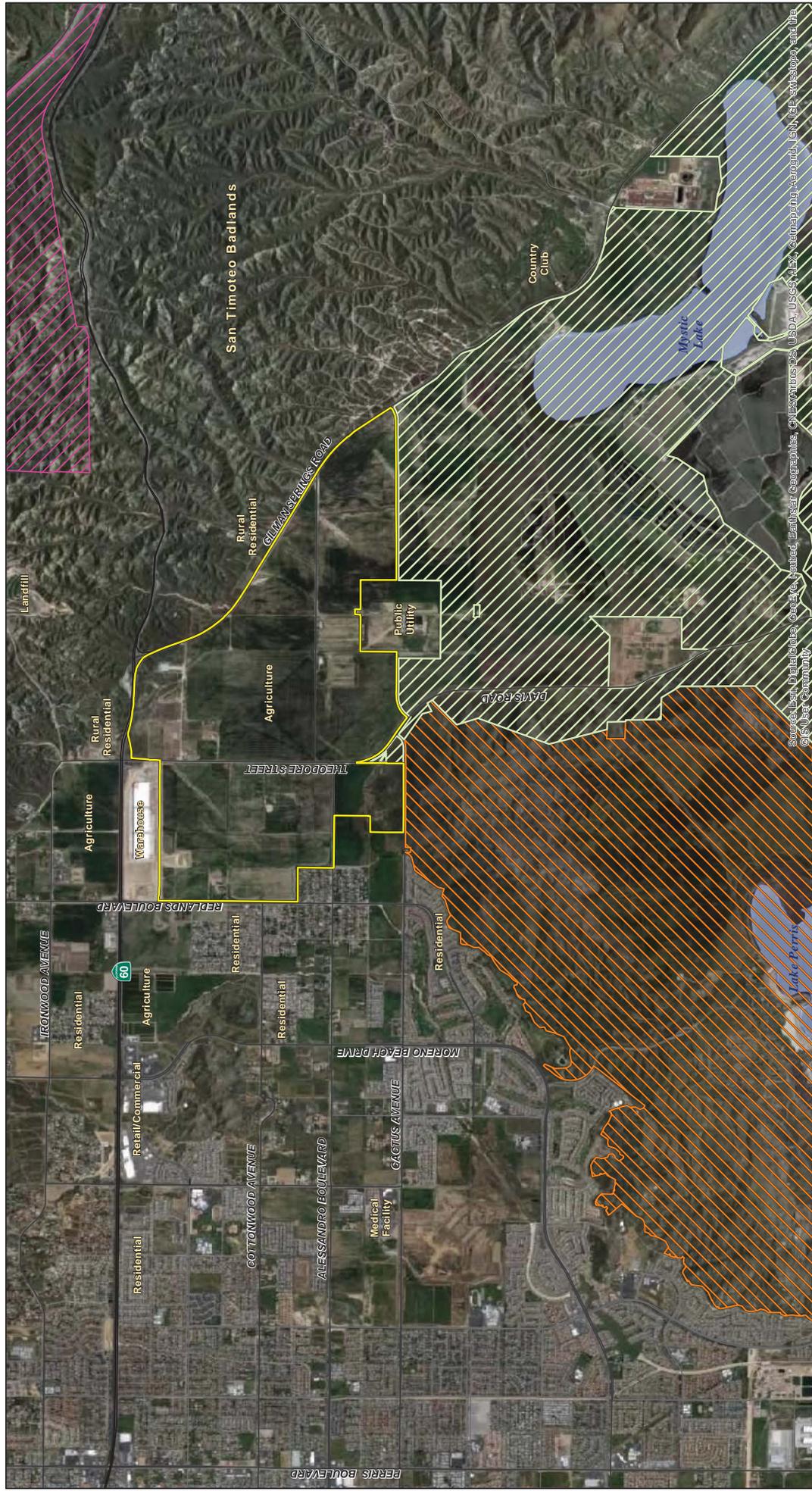
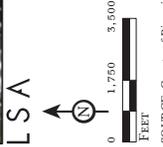


FIGURE 3.3

- Project Boundary
- San Jacinto Wildlife Area (CDEW)
- Lake Perris State Recreation Area
- Norton Younglove Reserve
- Waterbody



World Logistics Center Specific Plan Project
 Environmental Impact Report
 Existing Land Use

SOURCE: County of Riverside, 2003 & 2011; California Dept. of Fish and Game, 2011; Google Earth, 2011
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Near the southwest boundary of the project site is an existing residential neighborhood at the intersection of Redlands Boulevard and Alessandro Boulevard; a small market and a post office are also located near this intersection. This area is referred to as “Old Moreno.” The Moreno Valley Ranch and Golf Club residential community is approximately one mile southwest of the project area.

There is little development adjacent to the east and south boundaries of the project area. The area east of the project site across Gilman Springs Road is commonly referred to as the Badlands, a rugged area that separates the City of Moreno Valley from San Timoteo Canyon and the City of Beaumont. Due to its steep slopes and canyons, the Badlands area has experienced little development; however, there are approximately ten single-family homes in the area east of Gilman Springs Road near the project site. The Badlands Sanitary Landfill, operated by the County of Riverside Waste Management Department, is located approximately 1.5 miles northeast of the project area.

Immediately south of the proposed project is the San Jacinto Wildlife Area (SJWA), which includes an “Upland Game Hunting Area,” and Mystic Lake. These lands are state-owned and access to these areas is restricted. The Lake Perris State Recreation Area is west of the SJWA and is owned and operated by the California State Parks Department and contains approximately 6,000 acres of open space land, which is used both for recreation and preservation of the natural southern California landscape.

The closest large-scale commercial development is located on the south side of SR-60 at Moreno Beach Drive, approximately 1.25 miles to the west of the proposed project. This shopping complex includes a Walmart and Target along with restaurants and ancillary commercial and service uses, and the Moreno Valley Auto Center. The central core of Moreno Valley, which includes residential neighborhoods and more extensive commercial activity, is located approximately three miles west of the project area.

March Air Reserve Base (MARB) is located approximately seven miles southwesterly of the proposed project. The MARB is under the authority of the March Joint Powers Authority (MJPA), which acts as the land use authority as well as the March Inland Port Airport Authority for reuse of the former March Air Force Base.

3.2.4 Local History

In 1774, the Spanish explorer Juan Bautista de Anza traveled through this area, passing by Mystic Lake and traveling around the Mount Russell Range on his exploration of Alta California.

The project area was first developed in the late 1890s; prior to this, the property had been part of the *San Jacinto Nuevo y Potrero Rancho*. This Rancho, a subdivision of the massive San Jacinto Rancho (originally 8 square leagues in size or more than 50 square miles) lay vacant during the Spanish era and was not part of any rancho until 1842. Once defined, the old road from Temecula to San Jacinto was expanded such that a road was established between San Jacinto and the Box Springs area of the City of Riverside and points beyond. This road probably ran along the track now covered by Gilman Springs Road, headed to Box Springs across what is now Moreno Valley, thence to Riverside and points west. Because of the lack of reliable water, it is unlikely that the project area was used during the early historic period for anything except springtime grazing of sheep and cattle.

During the historic era, most of the parcels in the project area have been used sporadically for dry-land crops and the occasional irrigated farming plots. Horses were raised on one farm in the northwest corner of the site. Although plans were made to bring water from Big Bear to the project area as part of a regional California land boom scheme (circa 1891), the plan was never completed because the issue of water rights was adjudicated in favor of the City of Redlands.

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The Moreno Valley area supported numerous military facilities from the early 1900s to today, with the March Air Reserve Base still functioning near I-215 on the west side of town. From the 1970s through the 1990s, Moreno Valley was one of the fastest-growing residential communities in the nation, and incorporated in 1984. In 1992, the City approved a master planned, mixed-use community called “Moreno Highlands Specific Plan” on most of the project site, but no uses within this community were ever built.

3.3 GENERAL PLAN AND ZONING DESIGNATIONS

3.3.1 Designations on the Project Site

The Community Development Element of the City’s General Plan currently designates the project area as a mix of residential, commercial, business park, and open space land uses. The currently approved 3,038-acre Moreno Highlands Specific Pan (MHSP) proposes a master planned, mixed-use community consisting of up to 7,763 residential dwelling units on approximately 2,435 acres and approximately 603 acres of business, retail, institutional, and other uses. Table 3.A is a summary of land uses of the MHSP. Figure 3.4 depicts the City General Plan land use designations for the area.

Table 3.A: Moreno Highlands Specific Plan (Current Land Use Designations)

Land Use	Acreage
Residential Community	
Residential (7,763 du)	1,359.3
Parks and Open Space	701.9
Neighborhood Commercial	10.0
Cemetery	16.5
Public Facilities	347.7
Planned Business Center	
Business Park	360.8
Mixed Use	80.5
Community Commercial	16.0
Parks and Open Space	77.9
Public Facilities	67.4
Project Total	3,038.0

Adopted by City Council March 17, 1992

As a result of a variety of factors, the Moreno Highlands Specific Plan has not been implemented.

The City’s 2006 Housing Element identified the Moreno Highlands Specific Plan as a potential source of vacant land that could accommodate possible future residential growth in the City. In 2011, the City updated its Housing Element and anticipated possible land use changes from mixed use and residential to jobs producing warehouses in the eastern part of the City. The 2011 Housing Element concluded that redesignating the entire land area east of Redlands to the eastern City border for warehouse uses would not impede the City’s Housing Element Objectives. The State Department of Housing and Community Development certified the City’s Housing Element as being in compliance with State law on February 22, 2011. The proposed project is consistent with the City’s current Housing Element.

Highland Fairview currently owns or controls development rights on 1,754 acres or 46 percent of the total 3,714 acres within the WLC project area and 67 percent of the WLCSP area. The remainder of the project area property is owned by private individuals or entities such as the San Diego Gas & Electric Company, Southern California Gas Company, Metropolitan Water District, and California Department of Fish and Wildlife. Figure 3.5 depicts the property ownership within the WLC project area.

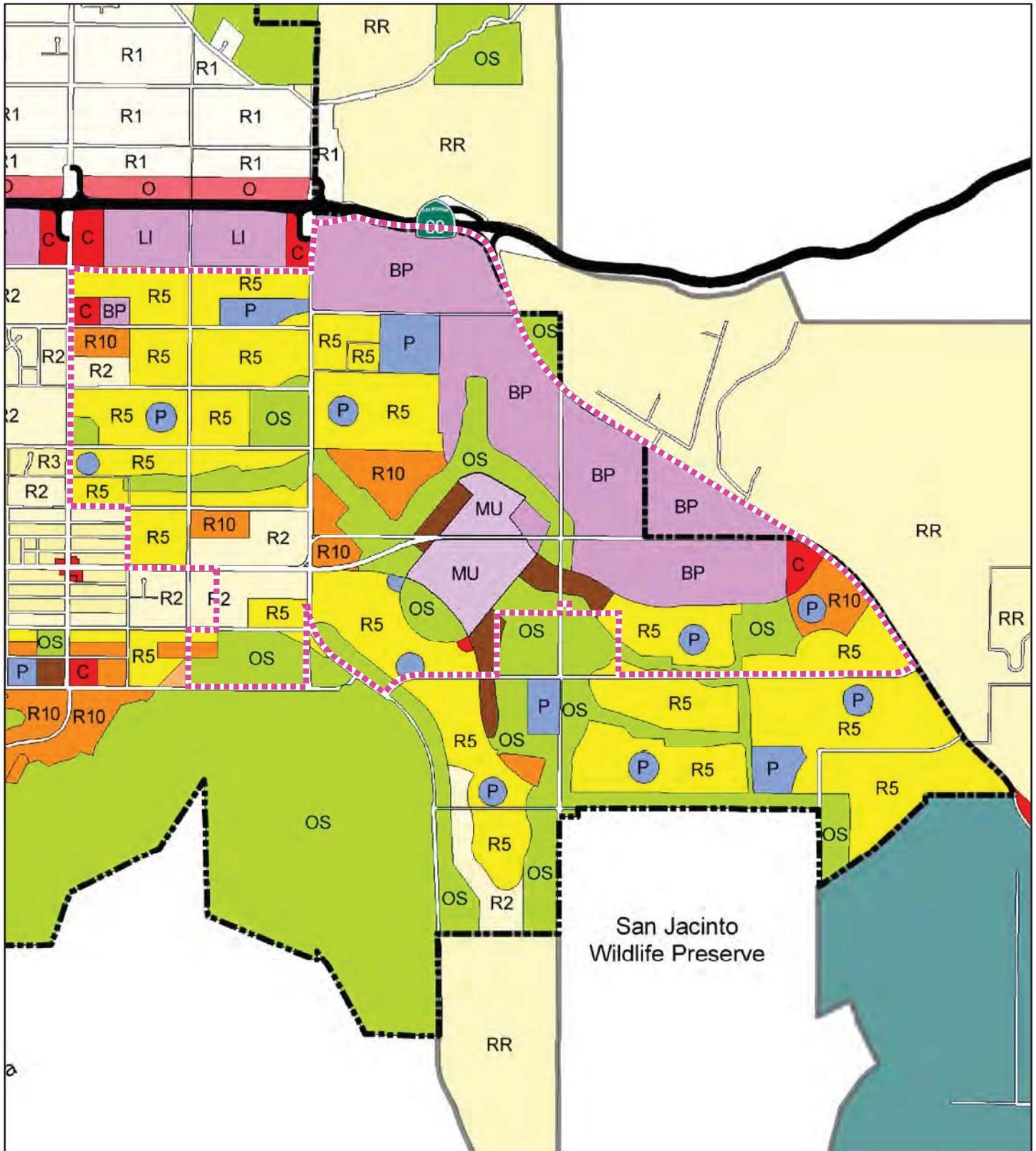
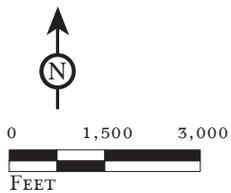


FIGURE 3.4

LSA



- Project Boundary
- Highways
- City Boundary
- Sphere of Influence

Land Use

- Residential: Max. 1 du/ac
- Mixed Use
- Residential: Max. 2 du/ac
- Residential: Max. 3 du/ac
- Residential: Max. 5 du/ac
- Residential: Max. 10 du/ac
- Residential: Max. 20 du/ac
- Office

- Commercial
- Business Park/Light Industrial
- Open Space
- Public Facilities
- Floodplain

*World Logistics Center Specific Plan Project
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General Plan Land Uses*

SOURCE: Riverside County and City of Moreno Valley, August, 2010.

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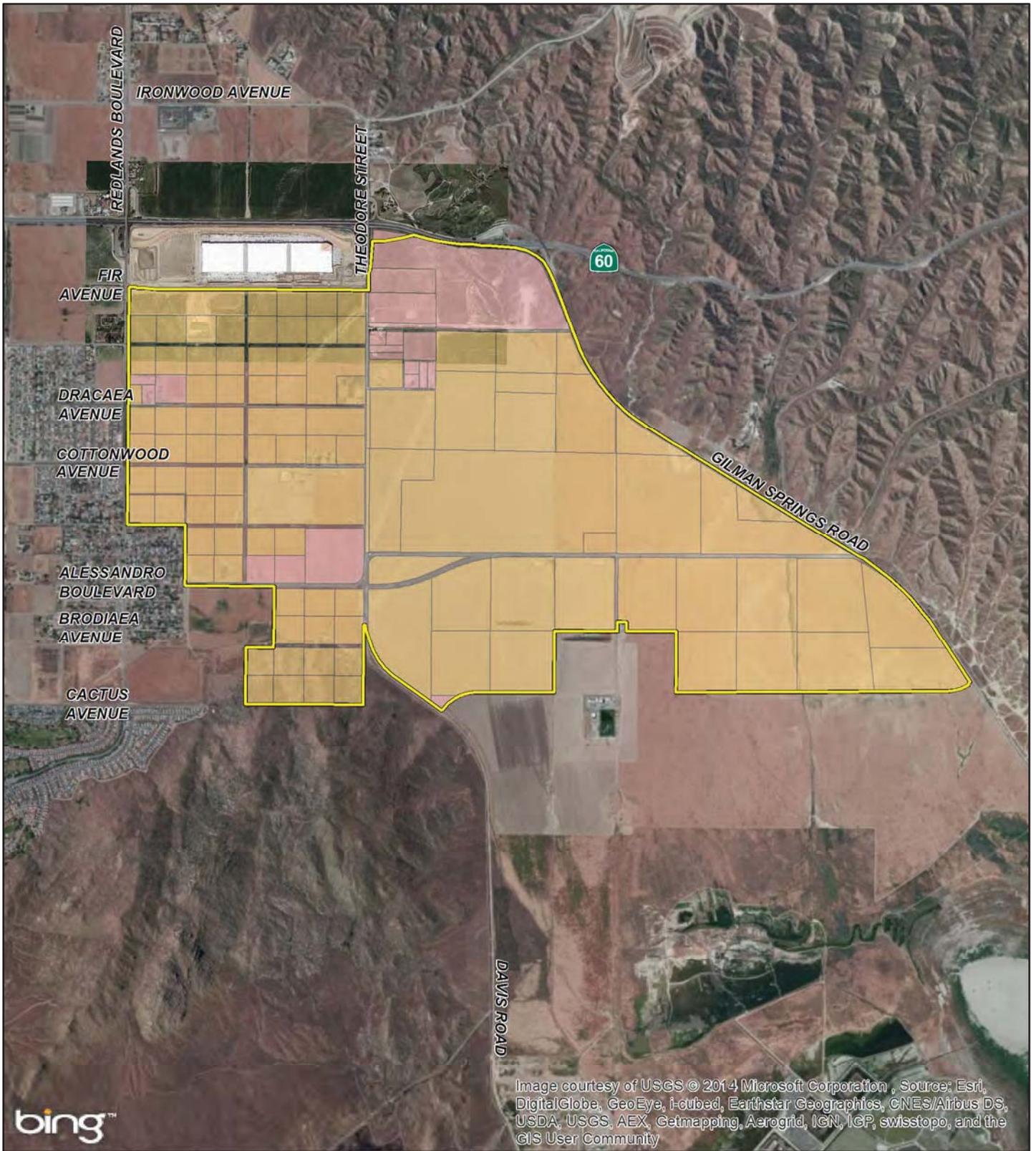
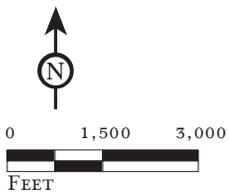


FIGURE 3.5

LSA



- Project Boundary
- Area Not Held by Highland Fairview
- Area Held by Highland Fairveiw

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Property Ownership

SOURCE: ESRI World Imagery, 2010; Bing Maps, 2010; Google Maps, 2011.

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An 85-acre parcel located on the west side of Gilman Springs Road near Alessandro Boulevard is within an unincorporated area of Riverside County and within the City Sphere of Influence adopted in 1985. The project will request a pre-annexation General Plan land use designation and zoning of Logistics Development (LD) within a Specific Plan for this parcel, and this EIR will be the environmental documentation used by the Local Agency Formation Commission (LAFCO) to complete the annexation action. The County's land use designation currently applicable to this parcel is W-2-2½. The W-2 area allows single-family residential and light agriculture (the suffix indicates minimum parcel size in acres) and the City's current General Plan land use designation for the site is Business Park (BP) under the MHSP.

The General Plan Amendment and Zone Change includes approximately 910 acres of land owned by the CDFW that are part of the San Jacinto Wildlife Area (SJWA). Much of this property is designated for residential development in the MHSP. The CDFW parcels were acquired by the State beginning in 1992 to act as a buffer from future development to the north (the MHSP) and to further the CDFW goal of eventually preserving approximately 20,000 acres of restored wetlands and ponds. The land around Mystic Lake was originally purchased as mitigation for habitat loss as a result of construction of the state water project.

The SJWA was the first state wildlife area to utilize reclaimed water to create and enhance wetlands, and improvements are ongoing. Waterfowl, wading birds, and quail are among the many animals found in this area. It also supports a number of private hunting clubs around its northwestern perimeter.

The following information was added at the request of the Metropolitan Water District of Southern California (Letter C-2) regarding the Inland Feeder.

The figure showing the location of the Inland Feeder can be found at the end of comment Letter C-2 from the Metropolitan Water District of Southern California.

“Metropolitan owns property and owns and operates facilities on and adjacent to the site of the proposed project. As shown on the attached map, Metropolitan's irregularly shaped fee-owned property (APN 422-040-009 and 422-040-015), Inland Feeder Tunnel, and appurtenant tunnel access structure are located within the proposed specific plan area. In addition, Metropolitan's 145-inch-inside-diameter Inland Feeder pipeline and appurtenant structures extend through the specific plan area in the street rights-of-way for Eucalyptus Avenue, Theodore Street, and Davis Road. Metropolitan also has a 110-foot-wide easement along Davis Road.”

3.3.2 Existing Conditions and Land Use Designations in Surrounding Areas

3.3.2.1 South of SR-60/East of Redlands Boulevard

Existing Conditions. This area is currently used mainly for dry farming, with several scattered rural residences. The only major improvements are several natural gas facilities and two local roadways (Alessandro Boulevard and Theodore Street).

Existing Land Use Designations. The Highland Fairview Corporate Park (HFCP) project is currently under development and Phase 1 (Skechers' North American Operational Headquarters) was completed in late 2011. HFCP is located immediately northwest of the project area, on the north side of Eucalyptus Avenue between Redlands Boulevard and Theodore Street. The HFCP project was

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approved by the City of Moreno Valley in 2009. The City General Plan land use designation for the site is a mixture of Commercial (C) and Business Park/Light Industrial (LI).

3.3.2.2 North of SR-60

Existing Conditions. This area is relatively rural at present with mixed light industrial uses along the freeway and scattered residences farther away from the freeway.

Existing Land Use Designations. The land located on the north side of SR-60 and westerly of Theodore Street is within the City of Moreno Valley and has a land use designation of Office (O) and Residential (R1—density of one dwelling unit per acre). The area easterly of Theodore Street is in an unincorporated area of Riverside County with land use designations of Scenic Highway Commercial (C-P-S) and Controlled Development Area (W-2). The W-2 area allows single-family residential and light agriculture (the suffix indicates a 2-acre minimum parcel size); and the C-P-S district allows certain wholesale and retail commercial uses. This county territory is within the City's Sphere of Influence; the City land use designation for the area is Rural Residential (RR) and Residential (R1).

3.3.2.3 East of Gilman Springs Road

Existing Conditions. This area currently contains scattered rural residences east and a golf course southeast of the WLC project area.

Existing Land Use Designations. The Badlands area, lying easterly of Gilman Springs Road, is within the jurisdiction of the County of Riverside and has a land use designation of Controlled Development Area (W-2, W-2-1, and W-2-20). Allowed uses include single-family residential and light agriculture (the suffix indicates minimum parcel size in acres). A portion of this county territory is within the City's Sphere of Influence. The City land use designation for the area is Rural Residential (RR).

3.3.2.4 Southern Boundary

Existing Conditions. All the land south of the WLC project site is part of the Mystic Lake/San Jacinto Wildlife Area property, and currently provides various open space uses related to the presence of wildlife around the lake.

Existing Land Use Designations. The lands south of the project are within the San Jacinto Wildlife Area and the Lake Perris State Recreation Area, and are designated either Open Space (OS) or public facilities (PF).

3.3.2.5 West of Redlands Boulevard

The following change has been made to update the DEIR with the most current information.

Existing Conditions. The land north of Eucalyptus Avenue (currently Fir Avenue) was recently approved for industrial warehousing (West Ridge Project) but the City approval of an EIR for that project had been challenged in court. As of the printing of this EIR the court challenge has been settled and the project sold. The new owners are currently processing a plot plan with the City. The land south of Fir Avenue is planned for suburban residential uses. There are residential

neighborhoods along the west boundary of the project site, west of Redlands Boulevard south of Eucalyptus Avenue, and east of Redlands Boulevard south of Cottonwood Avenue.

Existing Land Use Designations. The City land use designations for the residential areas west of Redlands Boulevard are Residential R2 and R3 (maximum density of 2 and 3 dwelling units per acre, respectively). Residential areas southerly of the site along Alessandro Boulevard are subject to City land use designations of R2 and R5 (maximum density of 2 and 5 dwelling units per acre respectively).

Table 3.B summarizes on-site and adjacent land uses for the project site.

Table 3.B: On-site and Adjacent Land Use Designations

Location	Jurisdiction	Current Land Uses	General Plan Land Uses	Zoning Designations
On site	City of Moreno Valley	Agriculture/dry farming, rural residential	Moreno Highlands Specific Plan	Moreno Highlands Specific Plan
North	County and City of Moreno Valley	SR-60, rural residential north of freeway	County W-2, C-P-S City RR, R1	County W-2, C-P-S City O, R1
South	County and State of California	Agriculture, San Jacinto Valley Wildlife Area	MHSP and OS (City and County)	MHSP and OS (City and County)
East	Riverside County	Gilman Springs Road, rural residential	RR (City)	W-2, W-2-1 and W-2-20 (County)
West	City of Moreno Valley	Residential, Industrial ¹	R2, R3, R5, and LI	R2, R3, R5, and LI

Sources: City of Moreno Valley General Plan Land Use Map, adopted August 2010; City of Moreno Valley Zoning, online data accessed March 2012. County of Sphere of Influence, data from Transportation Land Management Agency (TLMA), County website accessed March 2012.

¹ approved Westridge project

3.4 PROJECT CHARACTERISTICS

The Specific Plan being evaluated in this EIR covers 2,610 acres and proposes a maximum of 40.4 million square feet of “high-cube logistics” warehouse distribution uses classified as “Logistics Development” (LD) and 200,000 square feet (approximately 0.5%) of warehousing-related uses classified as “Light Logistics” (LL). The lands within the WLC Specific Plan that are designated LL are existing rural lots, some containing residential uses, that will become “legal, non-conforming uses” once the WLC Specific Plan is approved. In addition, the LD designation includes land for two special use areas; a fire station and a “logistics support” facility for vehicle fueling and sale of convenience goods (3,000 square feet is assumed for planning purposes for the “logistics support”). The components of the proposed project are discussed below and are shown in Figure 3.6.

3.4.1 Project Terms

The following terms and areas are defined here for the purposes of analysis in the EIR:

- **World Logistics Center Project:** The term refers to all related development and planning activities currently proposed by Highland Fairview in the Rancho Belago area of the eastern end of the City of Moreno Valley. The WLC property is generally located south of SR-60, east of Redlands Boulevard, west of Gilman Springs Road, and north of Mystic Lake and the San Jacinto Wildlife Area.

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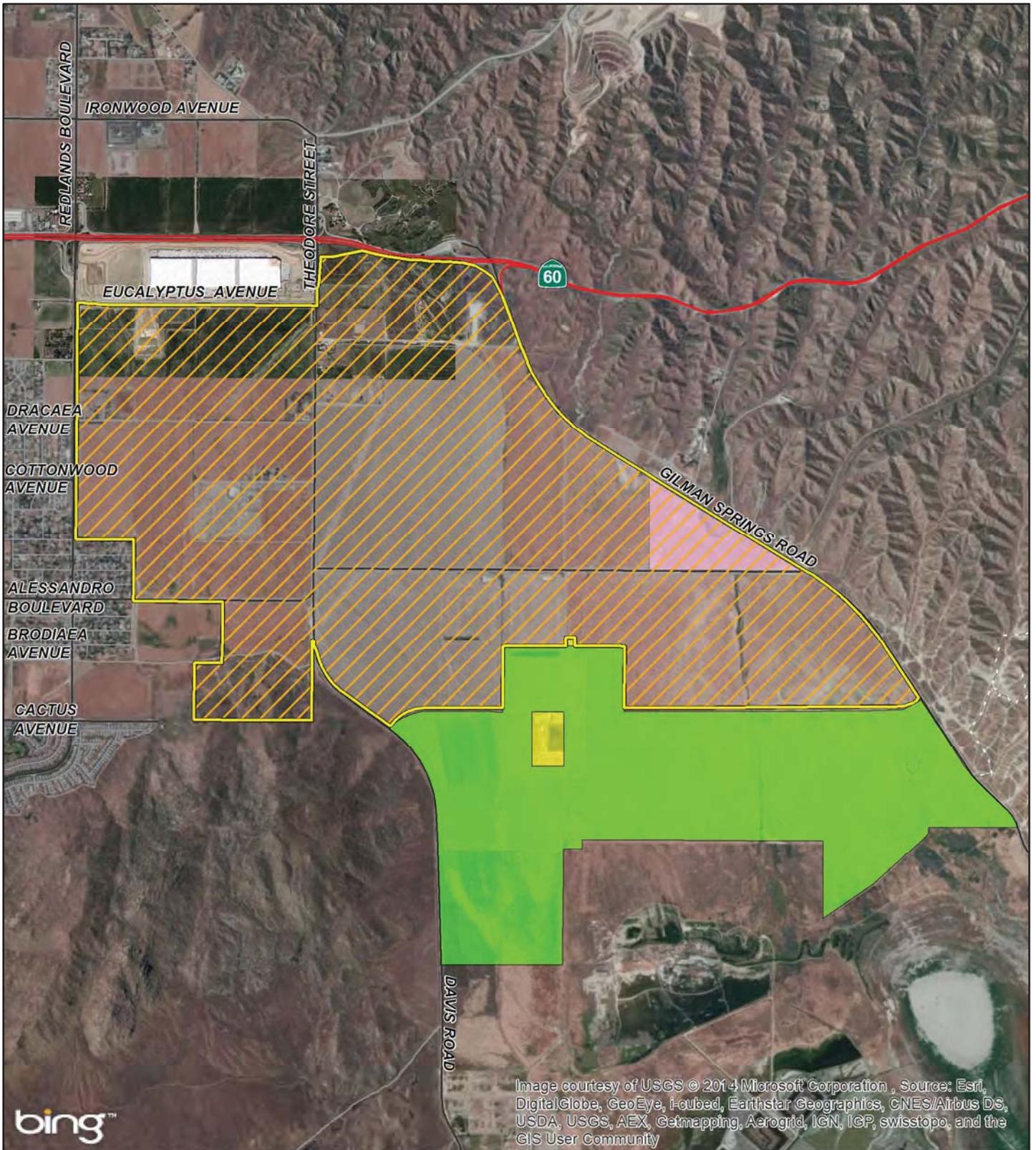
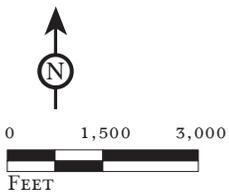


FIGURE 3.6

LSA



-  Project Boundary
-  Specific Plan
-  CDFW Land - Open Space
-  Public Utility
-  Annexation Area

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Component Areas

SOURCE: ESRI World Imagery, 2010; Bing Maps, 2010; Google Maps, 2011.

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- **Project Site or Project Area:** This term refers to the entire 3,818 acre area covered by the EIR encompassed by: (a) the Specific Plan Area (2,610 acres); (b) the CDFW Conservation Buffer Area (910 acres); (c) the Public Facilities area (194 acres); and (d) the Off-site Improvement Area on 104 acres.
- **CDFW Conservation¹ Buffer Area:** This term refers to a 910-acre parcel owned by the State of California as part of the San Jacinto Wildlife Area (SJWA). This land is within the City of Moreno Valley and is included in the approved Moreno Highlands Specific Plan. That plan designates this property for a broad mix of urban uses including suburban residential, schools, parks, and roads. This land was purchased by the State in 1991 as additional upland habitat for the SJWA and also to act as a buffer between the sensitive biological resources of the SJWA and the future urban development under the Moreno Highlands Specific Plan. This land has been actively farmed for many decades and most of it remains in active production. The southwestern portion contains areas of non-native grasslands, although aerial photographs show that this area has been intermittently tilled over the last 80 years. This property is included in the General Plan Amendment and the Zone Change to replace the current urban land uses that are permitted and to replace them with Open Space and Public Facility designations. This property is **not** within the proposed World Logistics Center Specific Plan (i.e., not in the area planned for development). This Conservation Buffer Area is a large part of the “Other Project Areas” described herein.
- **Other Project Areas:** The San Diego Gas & Electric Company (SDG&E) and the Southern California Gas Company (SCGC) own a total of 194 acres of land immediately south of the Specific Plan site. These properties are included in the proposed General Plan Amendment and the Zone Change to designate them for Open Space and Public Facilities uses. These designations are consistent with present uses. These properties are not within the proposed World Logistics Specific Plan. Approximately 174 acres of the land owned by SDG&E will be designated as Open Space. Nineteen acres of SDG&E land and one acre of SCGC land will be designated as Public Facilities.
- **Off-site Improvement Areas:** Development under the Specific Plan will require construction of a number of off-site infrastructure improvements covering approximately 104 acres of land adjacent to the Specific Plan Site including, but not limited, to the following facilities (see Figure 3.7):
 - Debris basins easterly of Gilman Springs Road;
 - Water reservoirs and access roads located northeast, north, and west of the project site;
 - SR-60 interchange improvements; and
 - Roadway, water, sewer, drainage, and utility improvements extending north and west from the project.
- **Specific Plan Site:** Approximately 2,610 acres of the project area are included in the proposed WLC Specific Plan, located generally south of SR-60, east of Redlands Boulevard, west of Gilman Springs Road, and north of the San Jacinto Wildlife Area.
- **WLC Specific Plan:** The revised WLC Specific Plan proposes a master-planned logistics campus to include up to 40.4 million square feet of high-cube logistics warehousing, up to 200,000 square feet of light logistics uses, and 74.3 acres of Open Space in the southwest corner of the site. The Specific Plan includes extensive development standards, design guidelines, and review procedures for all development within the project.
- **Annexation Area:** This term refers to an 85-acre parcel located adjacent to Gilman Springs Road that is to be annexed into the City of Moreno Valley. The parcel is already within the City’s Sphere of Influence, adopted on November 21, 1985.

¹ Although there were many comments suggesting the term “buffer” be removed from the name of this area, it accurately reflects the purpose of its purchase by the State Conservation Board. However, it should be noted that this land is, and will remain, part of the SJWA.

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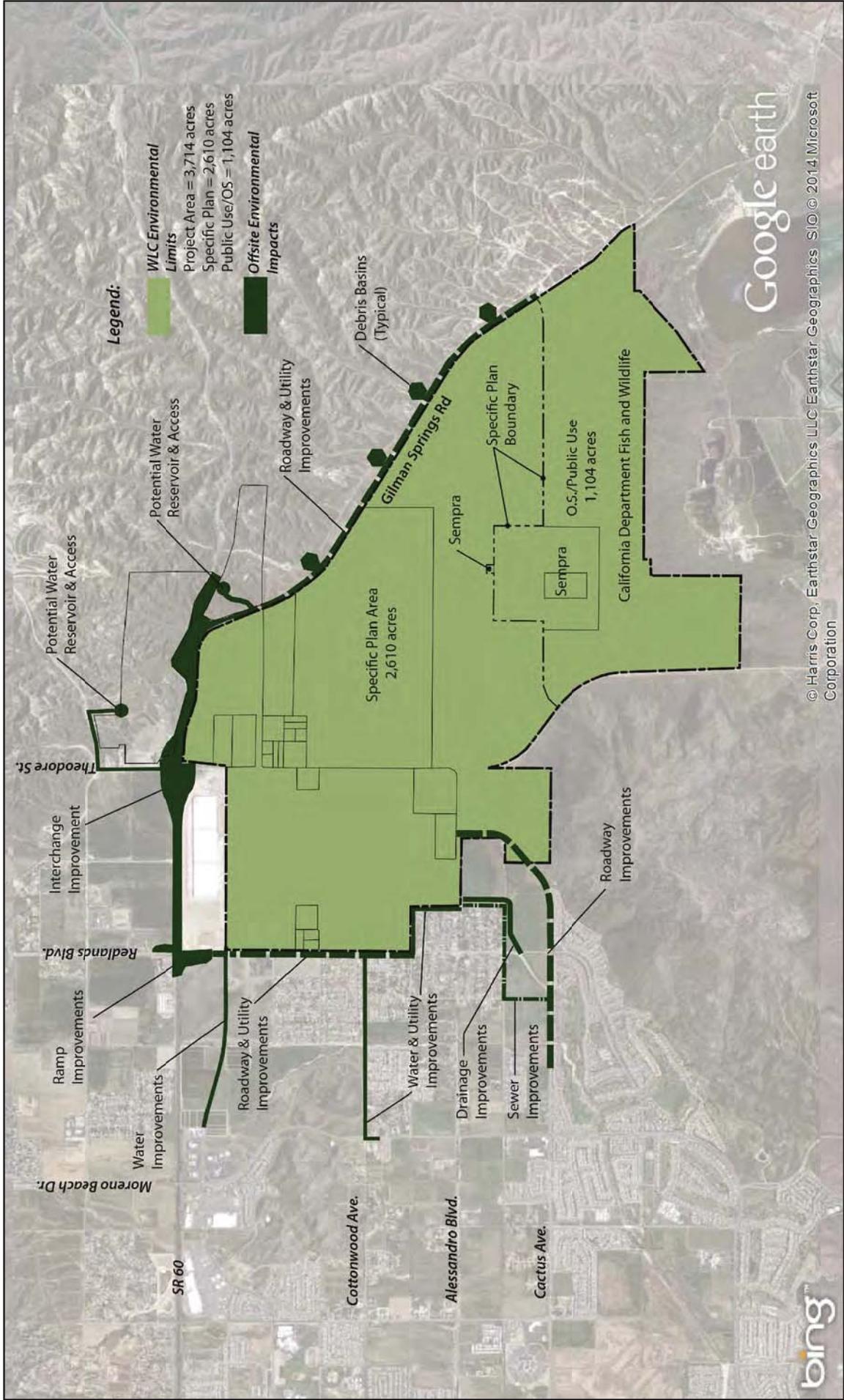
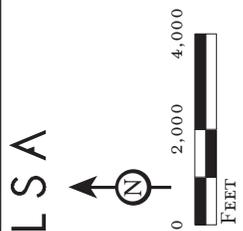


FIGURE 3.7



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- **Tentative Parcel Map Area:** A Tentative Parcel Map is being processed to subdivide 1,539 acres of the project for financing purposes only. This property is owned by the project applicant. Approval of the map will confer no development rights to the property.
- **General Plan Amendment:** One of the proposed entitlements is a General Plan Amendment (GPA) that will permit the establishment of logistics land uses on 3,487 acres of property located east of Redlands Boulevard and south of SR-60. The following General Plan Elements will be amended: Community Development; Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and General Plan Goals and Objectives. The GPA will replace the current Moreno Highland Specific Plan/General Plan Designations with the following land use designations: (a) 2,383 acres for high cube logistics development; (b) 1,084 acres of Open Space; and (c) 20 acres for Public Facilities. The General Plan land use designation for the site would become Business Park/Light Industrial (BP).
- **Zone Change:** The project includes a Zone Change covering, 3,714 acres, which will designate 1,084 acres of land for Open Space (CDFW and SDG&E properties), 20 acres for Public Facilities (SDG&E and SCGC properties), and 2,610 acres for the World Logistics Center Specific Plan. The specific land use zones would be Logistics Development (LD) and Light Logistics (LL).
- **State Lands:** Refers to lands owned by the State of California and includes the San Jacinto Wildlife Area (SJWA) located south of the Specific Plan Site, and the Lake Perris State Recreation Area (LPSRA) located southwesterly of the Specific Plan Site.
- **Moreno Highlands Specific Plan (MHSP):** This term refers to the currently approved Specific Plan that covers 3,038 acres of the project area. This Specific Plan permits the development of a master planned, mixed-use community consisting of up to 7,763 residential dwelling units and approximately 603 acres of business, retail, institutional, and other uses.

NOTE: Several commenters indicated that any mention of the current MHSP land plan should include the loss of 1,000 acres of land in the south end of that property that was purchased by the state for conservation as part of the SJWA, which is referred to in this document as the State Conservation Buffer Area.

- **Proposed Project or World Logistics Center Project:** General term applied to all of the entitlements outlined above that are addressed in this EIR, including:
 - WLC Specific Plan..... 2,610 acres
 - General Plan Amendment 3,714 acres
 - Zone Change 3,714 acres
 - Tentative Parcel Map..... 1,539 acres
 - Annexation..... 85 acres
 - Off-site improvements 104 acres

3.4.2 Logistics Warehousing Development

Logistics warehouses are used primarily for the storage and/or consolidation of manufactured goods (with no manufacturing) prior to their distribution to secondary retail outlets. These facilities consist of large buildings typically larger than 500,000 square feet in size, often subdivided for multiple tenants, with typical ceiling heights of 24 feet or more, and can be characterized by highly automated material handling systems supported by truck activities frequently during off-peak hours, and good freeway access. Goods imported through the Ports of Long Beach and Los Angeles as well as other locations

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are delivered via truck to the proposed distribution centers and distributed via truck to both in and out of state locations, thus benefiting both local and interstate commerce.

High-cube warehouse and logistics facilities include ancillary office and maintenance space along with the outdoor storage of trucks, trailers, and shipping containers. High cube-logistics warehouses provide businesses with a centralized location to sort, organize, and often transfer products from one shipping process to another where multiple forms of transport are available.

High-cube logistics warehouses are generally constructed with vertical-lift dock-high roll up doors to allow access for the loading and unloading of products from truck/trailers. Building interiors are typically large and open to accommodate the temporary storage and consolidation of the products to be distributed. Parking is provided for trucks and trailers in addition to parking for passenger vehicles in accordance with local standards.

3.4.3 Open Space Properties

The California Department of Fish and Wildlife (CDFW) owns 910 acres of vacant open space land within the project area. This area is the most northerly end of the San Jacinto Wildlife Area and all of it is being actively farmed. Section 4.4, *Biological Resources*, explains the importance of the SJWA in more detail, but generally supports a diversity of birds and other wildlife in and around Mystic Lake. This land was purchased by the State as a “buffer” between Mystic Lake and approved development under the Moreno Highlands Specific Plan within the City of Moreno Valley. This land is currently actively farmed and provides raptor foraging habitat in the northern portion of the SJWA. This land is designated as permanent open space on the proposed General Plan Amendment and Zone Change.

SDG&E owns and maintains 174 acres of open space around its 19-acre Moreno Compressor Station plant. The WLC project proposes this land be designated as permanent Open Space under the City General Plan and zoning.

The Specific Plan includes 74.3 acres of land designated as open space in the southwest corner of the property. It should be noted that Mount Russell and the Mount Russell Range are immediately southwest of the project area, along with the Lake Perris State Recreational Area. No development is proposed for the 74.3 acres designated as Open Space within the Specific Plan.

3.4.4 Moreno Compressor Plant and Public Facilities

SDG&E operates a regional natural gas compression-transmission facility on 19 acres in the south-central portion of the site. This site is bounded on three sides by the CDFW property identified in Specific Section 3.4.3. The project proposes to designate this facility as “Public Facility” under the City General Plan and zoning, and does not propose or anticipate any further development of this site. Any proposal to expand the existing facilities at the site would require separate evaluation under CEQA.

A one-acre natural gas facility operated by SCGC is located just north of the Moreno Compressor Facility. It is also proposed to be designated as “Public Facility” as part of the project.

3.4.5 Annexation Area

Approximately 85 acres of land within the project area are within an unincorporated area of Riverside County and within the City’s Sphere of Influence. The proposed project includes the completion of the annexation process for this land. This property is located just west of Gilman Springs Road and north of Alessandro Boulevard and is currently dry farmed similar to the land surrounding it. The project includes

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approval of a pre-annexation General Plan and zoning land use designations of Logistics Development (LD) within the Specific Plan for this parcel. This EIR will be the environmental documentation used by the LAFCO to complete the annexation action, which commenced when the property was included in the City's Sphere of Influence in 1985. The County's land use designation currently applicable to this parcel is W-2-2½, which allows single-family residential and light agriculture, while the City's current General Plan land use designation for the site under the MHSP is Business Park (BP).

3.4.6 World Logistics Center Specific Plan

The proposed project includes a Specific Plan to implement the new General Plan Amendment and to set forth comprehensive land use regulations governing the proposed project. The Specific Plan is a master plan for the future development of up to 40.6 million square feet of building area on 2,610 acres, providing for mainly high-cube logistics and distribution facilities. This programmatic EIR provides a streamlined environmental review process for future development projects in the WLC Specific Plan area, including site-specific subdivisions and development entitlements that are consistent with the overall plan. Subsequent projects that the City determines to be within the scope of the EIR may be approved pursuant to the procedures set forth in *CEQA Guidelines* Sections 15162 and 15177.

The following sections provide a summary of key elements of the Specific Plan, and Table 3.C provides a summary of the land uses of the Specific Plan and other areas addressed by the project.

Table 3.C: WLC Project Characteristics (updated September 2014)

Area/Land Use	Original Project		Revised Project	
	Acres	Square Footage	Acres	Square Footage
World Logistics Center Specific Plan (WLCSP)				
LD Logistics Development ¹	2,606	41,400,000	2,382.8	40,400,000
LL Light Logistics	29	200,000	37.1	200,000
OS Open Space	75	—	74.3	—
ROW ²	—	—	115.8	
WLCSP Total	2,710	41,600,000	2,610.0	40,600,000
Other Project Areas				
California Department of Fish and Wildlife	910	—	910	—
San Diego Gas and Electric – Open Space	174	—	174	—
San Diego Gas and Electric – Facility	19	—	19	—
Southern California Gas Company – Facility	1	—	1	—
Other Areas Total	1,104	—	1,104	—
Off-site Improvement Areas	104	—	104	—
TOTAL WLC PROJECT AREA	3,918	41,600,000	3,818	40,600,000
Floor Area Ratio (FAR)³	NA	0.352	NA	0.357

¹ Included in LD zone 3,000 square feet of "logistics support" in Planning Area 22 at northeast corner of Theodore and Eucalyptus.

² Right-of-Way included in each land use category

³ Floor Area Ratio (FAR) is gross building area divided by gross site area

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NOTE: The following changes are due to revisions to the Specific Plan size, land plan, and phasing.

3.4.6.1 Land Use Plan/Planning Areas

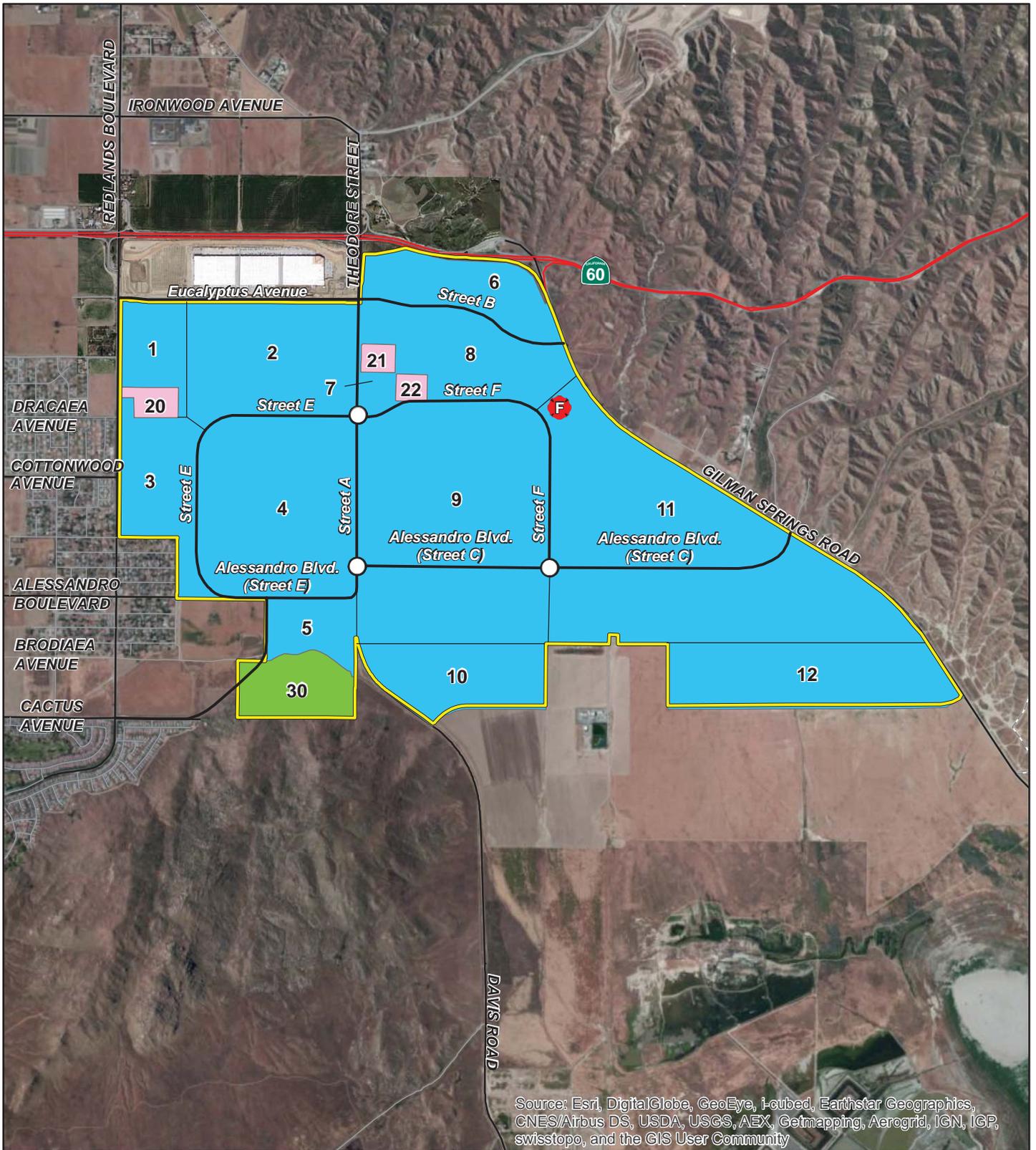
The WLC Specific Plan is a master plan for the development of up to 40.6 million square feet of development emphasizing modern high-cube logistics distribution facilities. The following information summarizes Section 2.0, *Land Use Plan*, of the WLC Specific Plan (see Appendix B), including three proposed land use designations, as shown in Figure 3.8.

High Cube-Logistics Development (LD). The WLC Specific Plan project proposes to develop approximately 2,383 acres with up to 40.4 million square feet of high cube logistics warehouse space. This represents approximately 99.5 percent of the total building area of the WLC Specific Plan project. Land uses allowed under this classification include high cube logistics warehouse buildings of 500,000 square feet or greater. High cube logistics warehouses are characterized by a high level of automated material handling systems and typical truck activities outside of the peak hour. High cube logistics warehouses are generally used for the storage of manufactured goods prior to their distribution to retail outlets (see Section 4.15 and Appendix J of this EIR). Warehouses permitted in the LD portion of the WLC would be no smaller than 500,000 square feet, with a maximum height of 80 feet. The Specific Plan prohibits buildings over 60 feet in height along the western, northern, and southern boundaries of the site (see Figure 3.9).

Warehousing and logistics activities consistent with the storage and processing of manufactured goods and materials prior to their distribution to other facilities and retail outlets will be permitted throughout the Specific Plan. Refrigerated warehouse space is not an allowed use within the Specific Plan area (see Mitigation Measure 4.3.6.3E). Ancillary office and maintenance space is included along with the outdoor storage of trucks, trailers, and shipping containers. LD land uses provide a location for businesses to sort, organize, and transfer products from one shipping process to another.

Special Uses. Two “special use” areas are proposed within the land designated LD within the WLCSP. The first special use is at least one City fire station in Planning Area 11 east of Street F and west of Gilman Springs Road, although the City Fire Chief has not determined the specific site yet. The second special use area is for “logistics support” which will provide alternative fueling services for onsite users. The WLCSP encourages the development of warehousing that uses trucks powered by non-diesel fuels such as natural gas. The Specific Plan requires that smaller on-site service vehicles associated with these same buildings will use non-diesel fuels such as compressed natural gas (CNG) (WLCSP Section 12.3). The use of LNG/CNG will substantially reduce vehicular emissions from the WLC project, including diesel particulate matter (DPM) and other diesel-related pollutants. This facility will include a maximum of 3,000 square feet of building area for diesel and LNG/CNG fuel sales, and for a small convenience store on a minimum of a 1 acre plot. This facility will be located a minimum of 250 feet away from any residential uses (see Specific Plan Section 2.2.5, Land Use Plan for more information on this facility). Other permitted uses within the “logistics support” area include construction yards within, or immediately adjacent to approved construction sites, cellular transmission facilities and structures and public utility uses and structures.

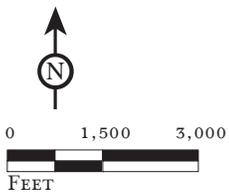
NOTE: Diesel Emissions and Project Operation Restrictions. All medium-heavy duty trucks and heavy-heavy duty trucks entering logistics sites will be required to meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Year 2010 diesel engines are generally considered to be as “clean” in terms of emissions compared to natural gas engines. Facility operators must maintain a log of all trucks entering the facility to document that on average, the daily truck fleet meets the emission standards contained in this mitigation. This log shall be available for inspection by City staff at any time. All service yard trucks (hostlers, yard goats, etc.), pallet jacks, forklifts, and other on-site equipment used during operation shall be powered by electricity, natural gas, and/or propane. Electrical power sources shall be provided for service equipment.



Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

FIGURE 3.8

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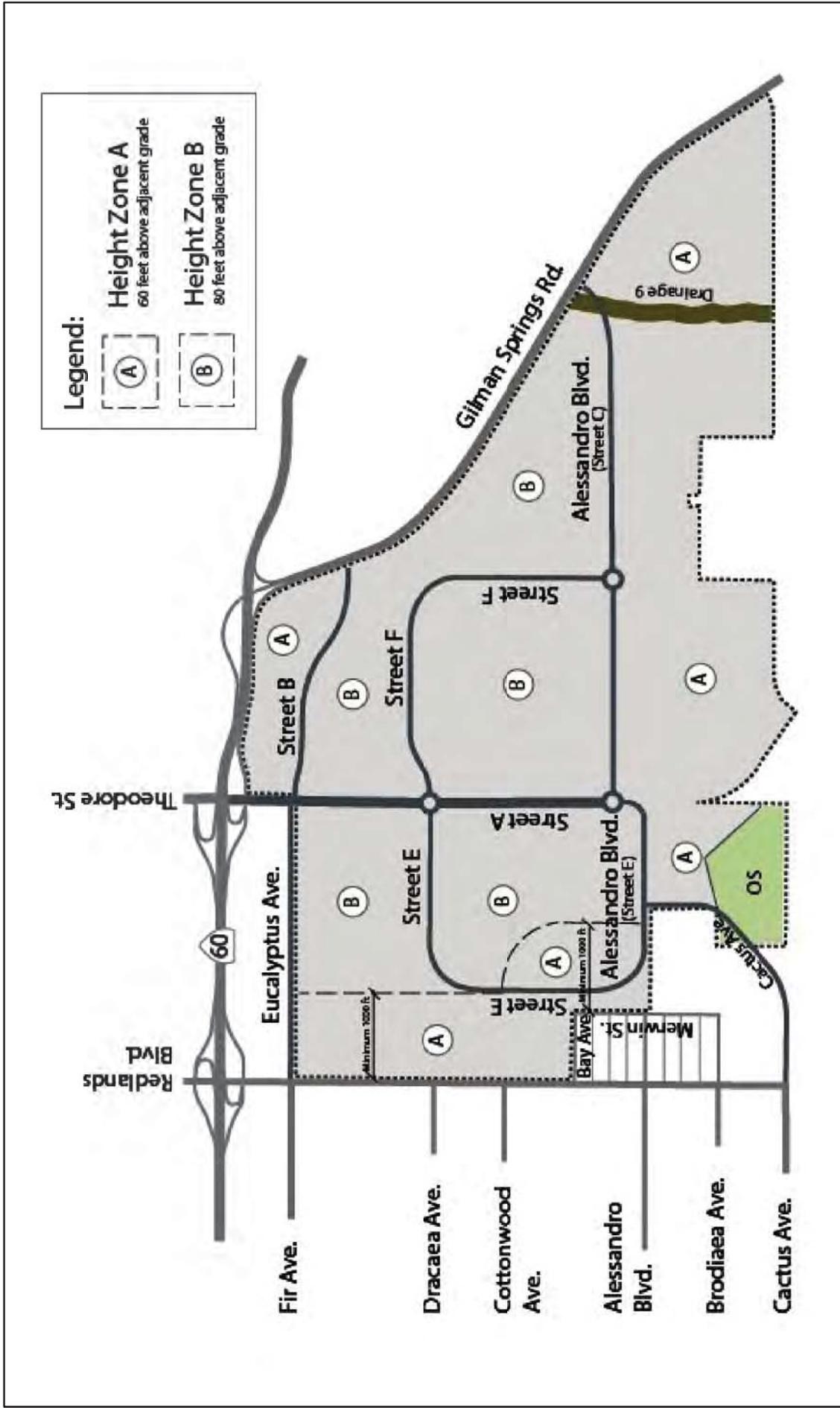
- Project Boundary
- Light Logistics
- Logistics Development
- Open Space
- F Fire Station Site
- 1 Planning Area Number

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Specific Plan Land Uses

SOURCE: ESRI World Imagery, 2010; Bing Maps, 2010; Google Maps, 2011.

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FIGURE 3.9

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Light Logistics Uses (LL). This category provides for the storage of materials such as general warehouse, self-storage, or vehicle storage uses, and would also include related office and/or maintenance areas. The WLC Specific Plan applies this designation to approximately 37 acres of existing lots that are not large enough for LD buildings (minimum 500,000 square feet). Buildout of these areas could support up to 200,000 square feet of building area or 0.5 percent of the planned development of the site. Some of these lots are currently improved with residential uses and/or agricultural uses. Under the Specific Plan, the residential and agricultural uses would become legal, non-conforming uses.

Open Space (OS). Approximately 74.3 acres in the southwest corner of the project area is designated for open space use in the Specific Plan. This property is adjacent to Mount Russell and the Lake Perris State Recreational Area. The Specific Plan restricts this property to passive open space and recreation uses. According to the WLC Specific Plan Section 2.4 the entire Open Space in Planning Area 30 will be offered for dedication in fee to the State of California for expansion of its adjacent ownership, or other public or private conservation organizations (see DEIR Section 4.1.6.1 for details). It should be noted that the only improvement planned for this area is the extension of Cactus Avenue.

Planning Areas. The Specific Plan land use plan is divided into sixteen (16) Planning Areas based on traffic impact zones which allows for more accurate estimates of potential traffic and air quality impacts of the WLC Project. The specific land use of each planning area is outlined in Table 3.D. Planning Areas (PA) 1-12 are designated as Logistic Development (LD), PA 20-22 are designated as Light Logistics (LL), PA 7 has been specified as an alternative fueling station (refer to DEIR Section 3.4.7.5 for more information), and PA 30 is Open Space (OS). The previous Figure 3.8 shows the locations of the new planning areas for the WLCSP on the revised land use plan.

NOTE: The following table and figure have been added to show planning areas in the Specific Plan.

Table 3.D: WLC Project Land Uses by Planning Areas (all new from original DEIR)

Planning Area (PA)	Land Use Designation	Area (acres)	Building (square feet)
Logistics Development (LD)			
1	LD	77.8	1,100,000
2	LD	193.5	4,200,000
3	LD	120.3	1,600,000
4	LD	301.5	5,600,000
5	LD	64.2	600,000
6	LD	115.3	500,000
7	LD	10.3	50,000
8	LD	142.9	2,150,000
9	LD	485.8	10,400,000
10	LD	139.9	2,200,000
11	LD	500.0	8,000,000
12	LD	231.3	3,500,000
Subtotal		2,382.8	40,400,000
Light Logistics (LL)			
20	LL	16.1	45,500
21	LL	10.5	77,250
22	LL	10.5	77,250
Subtotal		37.1	200,000

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Table 3.D: WLC Project Land Uses by Planning Areas (all new from original DEIR)

Planning Area (PA)	Land Use Designation	Area (acres)	Building (square feet)
Open Space (OS)			
30	OS	74.3	—
Other			
ROW		115.8	—
Total		2,610.0	40,600,000

Source: WLCSP September 2014

3.4.6.2 Circulation System

The revised General Plan Circulation Element (as amended by the proposed WLC project) and the Specific Plan’s Circulation Plan (Specific Plan Section 3.1) provides for the movement of vehicles in and around the World Logistics Center area. It provides the details of the road/street designations, right-of-way design, and road improvement thresholds. This section addresses the interface of the planning area with existing roadways as defined in the City General Plan.

Four key roadways will provide access to the proposed project: Theodore Street, Eucalyptus Avenue (between Redlands Boulevard and Theodore Street), Gilman Springs Road, and Alessandro Boulevard (between Gilman Springs and the proposed extension of Cactus Avenue), as depicted in previously referenced Figure 3.6. The Specific Plan identifies five points of access for project traffic: (1) Eucalyptus Avenue at Redlands Boulevard; (2) Theodore Street at SR-60; (3) Street B at Gilman Springs Road; (4) Street C at Gilman Springs Road; and (5) Cactus Avenue Extension extended to Cactus Avenue (no trucks, passenger vehicles only). Primary vehicular access to the project would be from SR-60 at Theodore Street and interchange improvements are planned to accommodate the increase in traffic volumes.

The Traffic Section of the DEIR provides that Transportation Management Plans (TMPs) may be included with each future building-specific project proposal in order to address project parking requirements in order to support “green building” or sustainable concepts. The number of required parking spaces may be modified subject to the approval of a TMP based on the provision of carpooling, van pools, staggered work hours or other facilities and programs. TMP applications would be processed in connection with future project-specific development applications.

Street Improvements. The following roadways lie on the project perimeter. Future improvements to project-affected roadways will be completed in accordance with City General Plan standards. Figure 3.10 provides the WLCSP Circulation Plan and Figure 3.11 shows the typical street cross-sections.

- **State Route 60.** SR-60 is a State freeway that currently has two mixed-flow lanes in each direction. Future improvements are planned by Caltrans to add a separate truck lane eastbound on the freeway through the Badlands including a dedicated truck lane in the future. SR-60 provides primary access to the project area.
- **Redlands Boulevard.** Redlands Boulevard is a designated truck route between SR-60 and Eucalyptus Avenue only; therefore, truck travel would be prohibited on Redlands Boulevard south of Eucalyptus Avenue. The ultimate street section is a 4-lane Divided Arterial.
- **Eucalyptus Avenue (west of Theodore Street).** Eucalyptus Avenue is a 4-lane Divided Arterial within an ultimate right-of-way of 110 feet. Improvements on the north side of the street (two westbound lanes, a raised median, and one eastbound lane) were recently completed by the HFCP project.

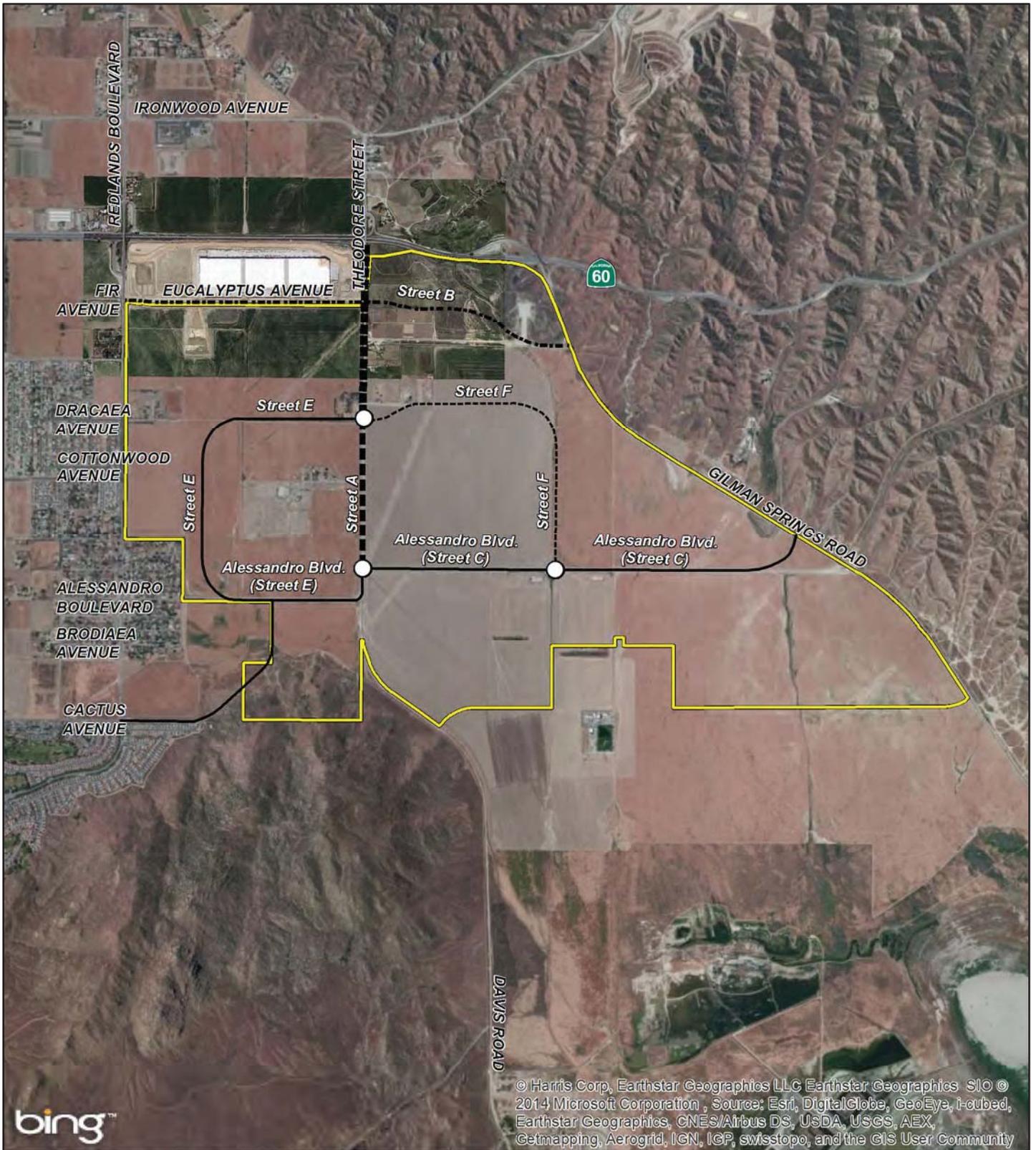
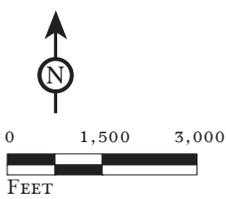


FIGURE 3.10

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- Project Boundary
- Traffic Circle
- 6-Lane Divided (Wide Median)
- 4-Lane Divided (Wide Median)
- 4-Lane Divided (Std. Median)
- 4-Lane Undivided
- 2-Lane

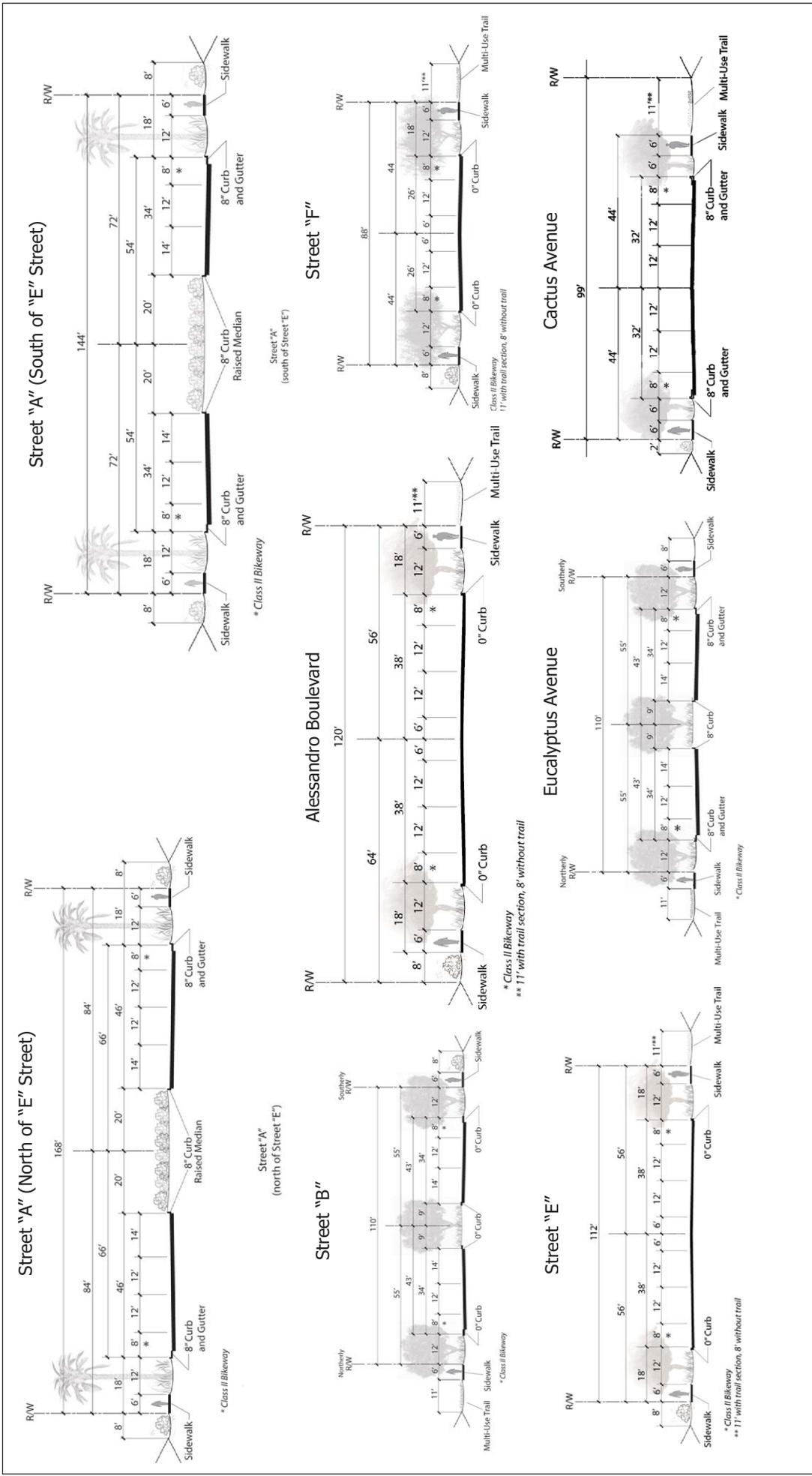
See figure 3.11 for typical roadway cross sections.

World Logistics Center Specific Plan Project
Environmental Impact Report

Circulation Plan

SOURCE: ESRI World Imagery, 2010; Bing Maps, 2010; Google Maps, 2011.

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LSA FIGURE 3.11

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- **Cactus Avenue (extension east of Redlands Boulevard).** This is proposed to be a 4-lane undivided north-south roadway connecting existing Cactus Avenue with the westerly internal loop street (Street "E"). The intersection with Street "E" and would be designed to prohibit large trucks from using Cactus Avenue Extension to prevent their travel through adjacent residential neighborhoods. Special design features and signage will reinforce this restriction.
- **Gilman Springs Road.** At project opening year 2013, Gilman Springs Road will remain in its current condition (i.e., a two-lane undivided roadway) and future improvements would occur based on demand. The ultimate street section is a Divided Major Arterial with six through lanes and a raised median. Gilman Springs Road is a City-designated truck route. However, because Gilman Springs Road is partially a Riverside County facility and is thus partially outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made outside of its jurisdiction.

The following roadways within the Specific Plan are classified as Arterials (see Figure 3.11). Access rights and intersections with other streets or highways are limited:

- **Theodore Street (Street A).** Theodore Street is a north/south Arterial and is the primary truck route to and from SR-60. The ultimate street section is a four- to six-lane Divided Arterial within a 144-foot right-of-way including a landscaped median. Traffic roundabouts are proposed at the two key intersections along Theodore Street within the project.
- **Street B (Eucalyptus Avenue east of Theodore Street).** This roadway will ultimately extend through the project from Theodore Street to Gilman Springs Road. The proposed street section is currently a four-lane Divided Arterial with a 122-foot right-of-way and a standard median.
- **Streets C and E.** The WLCSP circulated for public review with the Draft EIR showed these roadways would be four-lane Minor Arterials each within a 112-foot right-of-way with no median. Traffic roundabouts were proposed at key intersections within the project to facilitate efficient movement of trucks. However, these streets have been realigned northward to maintain the local historical landmark designation of Alessandro Boulevard (see below).
- **Alessandro Boulevard.** Alessandro Boulevard currently runs through the WLC site in an east-west direction, connecting to Gilman Springs Road on the east and traveling through Moreno Valley to the west. The WLCSP circulated for public review with the Draft EIR showed Alessandro Boulevard realigned as Streets C and E (see below). However, this roadway has been designated a City historical landmark, so the WLCSP circulation plan has been modified to retain the name, ROW width, and current alignment of Alessandro Boulevard as an undivided roadway running east-west through the World Logistics Center, still intersecting with Gilman Springs Road on the east and the Cactus Avenue Extension on the west. An existing section of Alessandro Boulevard between Merwin Street and the Cactus Avenue Extension will be closed to vehicular traffic except for emergency vehicles and bicycles and pedestrians access. This is to prevent project traffic, both trucks and passenger vehicles, from traveling through the existing residential neighborhoods to the west.

The smaller roadways within the Specific Plan (Streets F through H) would convey truck and other vehicle traffic in and around the project site. These two-lane roadways will have an ultimate right-of-way of 88 feet.

As Figure 3.10 shows, the Specific Plan proposes traffic roundabouts at the three internal intersections (Theodore Street/Streets E & F, Theodore Street/Alessandro Boulevard, and Street C/Street F).

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Planned Improvements. As part of the analysis of project traffic impacts, it is important to note that development within the WLCSP will make a number of roadway and intersection improvements that are within or adjacent to project property (i.e. onsite improvements). As outlined in the project TIA, these improvements include but are not limited to:

- Gilman Springs/Alessandro Boulevard Intersection;
- Gilman Springs/Eucalyptus Avenue Intersection;
- SR-60 Westbound Ramp/Theodore Street Intersection;
- Redlands Boulevard/Eucalyptus Avenue Intersection;
- Theodore Street/Eucalyptus Avenue Intersection;
- Eucalyptus Avenue from Redlands Boulevard to Theodore Street (south side);
- Extension of Cactus Avenue east onto the WLC property; and
- Internal Streets A through F shown on WLCSP Circulation Plan (DEIR Figure 3-10).

Mobility. Section 3.4, *Non-Vehicular Circulation*, of the Specific Plan indicates that the intent of the mobility, transit, and pedestrian movement section is to ensure that people are able to move from one destination to another with minimal delays, either by walking or using other means of non-motorized travel. This means separating vehicles from pedestrian pathways and incorporating shared modes of travel such as trucks, autos, and bikes in the same right-of-way area where feasible. Bicycles would be able to use the street right-of-way throughout the project area. The Specific Plan states that project site development will support alternative transportation options for employees through implementation of on-site bicycle storage, preferred parking for low-emitting and fuel-efficient cars, carpool high-occupancy vehicles, and access to public transit.

According to Section 3.4.3, *Bicycle Circulation*, the Specific Plan will provide Class II (on-street) bicycle access along all connecting project roadways (i.e., not cul-de-sac streets), as shown in Figure 3.12. These Class II bicycle lanes will be integrated into the City's Bikeway Plan as well as the WRCOG Non-Motorized Transportation Plan, with connectivity to Class II bicycle lanes in the City that are adjacent to the WLC project site.

The Specific Plan requires sidewalks along all project streets (Specific Plan Section 5.2.8). Pedestrian movement relies on sidewalks providing direct access from the street to entry points for properties and buildings. Sidewalks are required to be shown on project-specific plot plans submitted for review by the City. All public street improvement shall meet the standards set forth in Title 24.

Local bus service to the area is provided by the Riverside Transit Agency (RTA). Local bus routes will be extended into the project area when adequate demand is generated as determined by the RTA. All roadways within the WLC area will be designed to accommodate bus access. The need for bus stops, turnouts, etc. will be determined by the RTA during the review of subsequent project-specific applications.

In addition to public sidewalks provided adjacent to project streets, Section 3.4.2 of the Specific Plan, *Multi-Use Trails*, requires the construction of a trail connection between the Redlands Boulevard/Cottonwood Avenue intersection and the existing Cactus Avenue trail connection to the Lake Perris Recreational Area. This new trail will continue along Street E avoiding the Open Space area and connect to a new trail head and a potential trail (by others) to the San Jacinto Wildlife Area at the former Davis Road alignment (see Figure 3.12). Engineering details of the new trail will be provided with project-specific development applications in this portion of the project area.

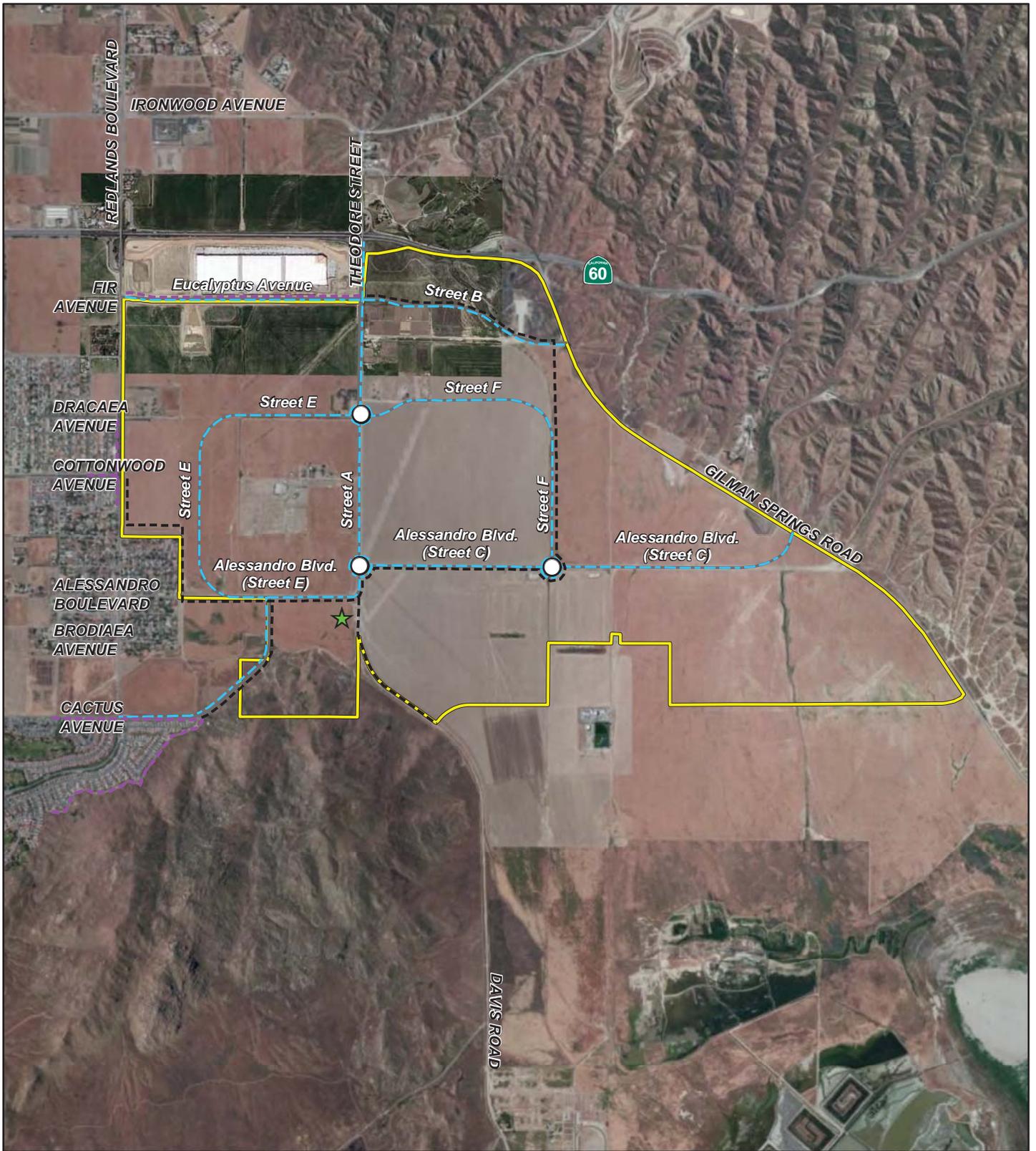
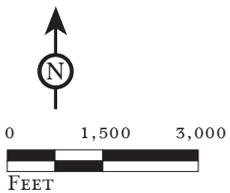


FIGURE 3.12

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- Project Boundary
- Class III Bikeway
- Conceptual Trail Alignment
- Existing Trail Alignment
- ★ Staging Area

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 Non-Vehicular Circulation

SOURCE: ESRI World Imagery, 2010; Google Maps, 2011.

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3.4.6.3 Utilities and Services

The Utilities section of the Specific Plan (Section 3.5) describes the infrastructure systems needed to support the development of the project. This section identifies facilities for potable water, reclaimed water, wastewater, storm drain systems, power, natural gas, and telecommunications. This section also addresses the demand for general City services.

Potable Water. The Eastern Municipal Water District (EMWD) provides water service to the project area. EMWD obtains its water from Metropolitan Water District (MWD) and local groundwater wells.

The 2009 EMWD Water Facilities Master Plan (Master Plan) in conjunction with the Moreno Valley Water Pressure Zone Realignment Study (Realignment Study) evaluated the existing and future water needs and facilities required for the Moreno Valley water system. The Master Plan and Realignment Study analyzed the existing water system operating pressures and flows and recommended improvements to the system including realignment of the 1764 and 1900 pressure zones to 1764, 1860, and 1967 pressure zones. The area is currently served by existing pipelines in the 1764 and 1900 pressure zones that range in size from 8-inch to 21-inch diameter pipes (see Figure 3.13). The Master Plan is included in Appendix M of this EIR. The Master Plan indicates that sufficient water is available for potable use and landscaping under expected conditions over a 20-year period.

The MWD owns and operates a 108-inch transmission line that runs north-south through the project area in Theodore Street, and then east-west in Eucalyptus Avenue, east of Theodore Street. Build-out of the proposed project site will require the construction of new water reservoirs to serve each of three water pressure zones (1967, 1860, and 1764). All three reservoir sites are located outside of the Specific Plan boundary. As development proceeds within the project area, new waterlines, ranging in size from 12 to 24 inches, will be constructed in the existing and future street rights-of-way to connect the future water tanks to the development area. The water system will require a new pump station at the 1764 reservoir and an upgrade to the existing EMWD pump station near Cottonwood Avenue and Redlands Boulevard.

All water facilities will be constructed to EMWD standards and will be subject to a Plan of Service approval by EMWD (Specific Plan Section 3.5.1). Previously referenced Figure 3.13 shows the new water system proposed for the project. The EIR will examine potential impacts of onsite and offsite water improvements including these reservoirs as outlined in Appendix M.

Reclaimed/Recycled Water. As stated in EMWD's Water Supply Assessment (Appendix M), EMWD policy recognizes recycled water as the preferred source of supply for all non-potable water demands, including irrigation of recreation areas, greenbelts, open space common areas, commercial landscaping, and aesthetic impoundment or other water features. The proposed project is near an existing recycled water line and EMWD has indicated that in the future, recycled water may be available for the project. If EMWD determines adequate recycled water supply is available, recycled water will be used on the proposed project to the greatest extent practical. The availability, feasibility, and reliability of recycled water use will be included in EMWD's evaluation of the Plan of Service for the project. Landscape irrigation may use potable water until recycled water facilities are in place. Information on reclaimed water is provided in Appendix N. "Purple" reclaimed water irrigation piping will be installed to certain landscaped areas as needed.

Wastewater. EMWD provides wastewater service to the project area at EMWD's Moreno Valley Regional Water Reclamation Facility (WRF) located in the southwestern portion of the City near Kitching Street and Mariposa Avenue. The WRF has the capacity to treat 16 million gallons per day

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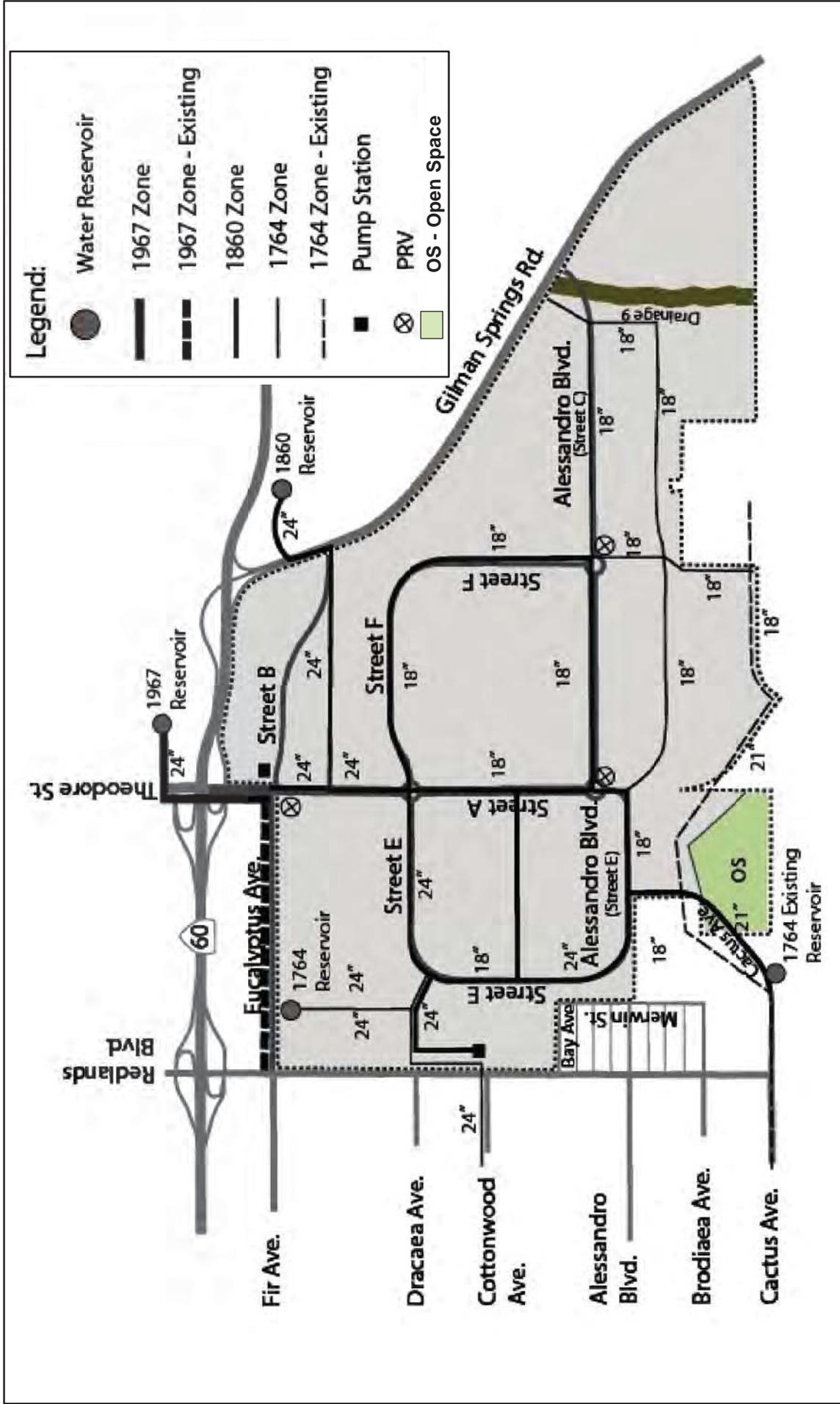
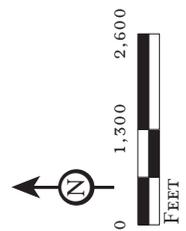


FIGURE 3.13

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(mgd) of wastewater. The analysis provided in Section 4.16, *Utilities and Service Systems*, indicates the WRF has a current excess capacity of 4.5 mgd and the proposed WLCSP would consume 0.3 mgd (6% of excess), so the WLC project does not by itself generate a need for new wastewater treatment facilities.

The primary trunk sewer line serving the project area is located within Redlands Boulevard. This trunk sewer line continues in a southerly direction within Cactus Avenue, JFK Drive, Iris Avenue, and Lasselle Streets conveying wastewater to the WRF (Specific Plan Section 3.5.2). The proposed sewer in Street A and all lines to the west of Theodore (Street A) are a gravity system and run generally southwest to a point of connection at Brodiaea Avenue and Redlands Boulevard. As demand requires, the segment of sewer line within Brodiaea Avenue that is west of Redlands Boulevard will be upsized from a 15-inch to a 21-inch line. The sewer system east of Theodore Street (Street A) will flow by gravity to a future sewer lift station at the southerly project boundary. From there, a force main will carry wastewater in a northwest direction, where it will join the gravity system west of Street A described above. Sewer lines will be located within public street rights-of-way to the greatest degree possible. Some of the buildings may require individual (private) lift stations due to building lengths, location of buildings, and phasing of improvements. Future sewer lines will range in size between 8 and 21 inches, and will be constructed to EMWD standards and will be subject to a plan of service approval. Figure 3.14 shows the proposed sewer/wastewater system for the Specific Plan. Technical studies related to wastewater services are provided in Appendix N.

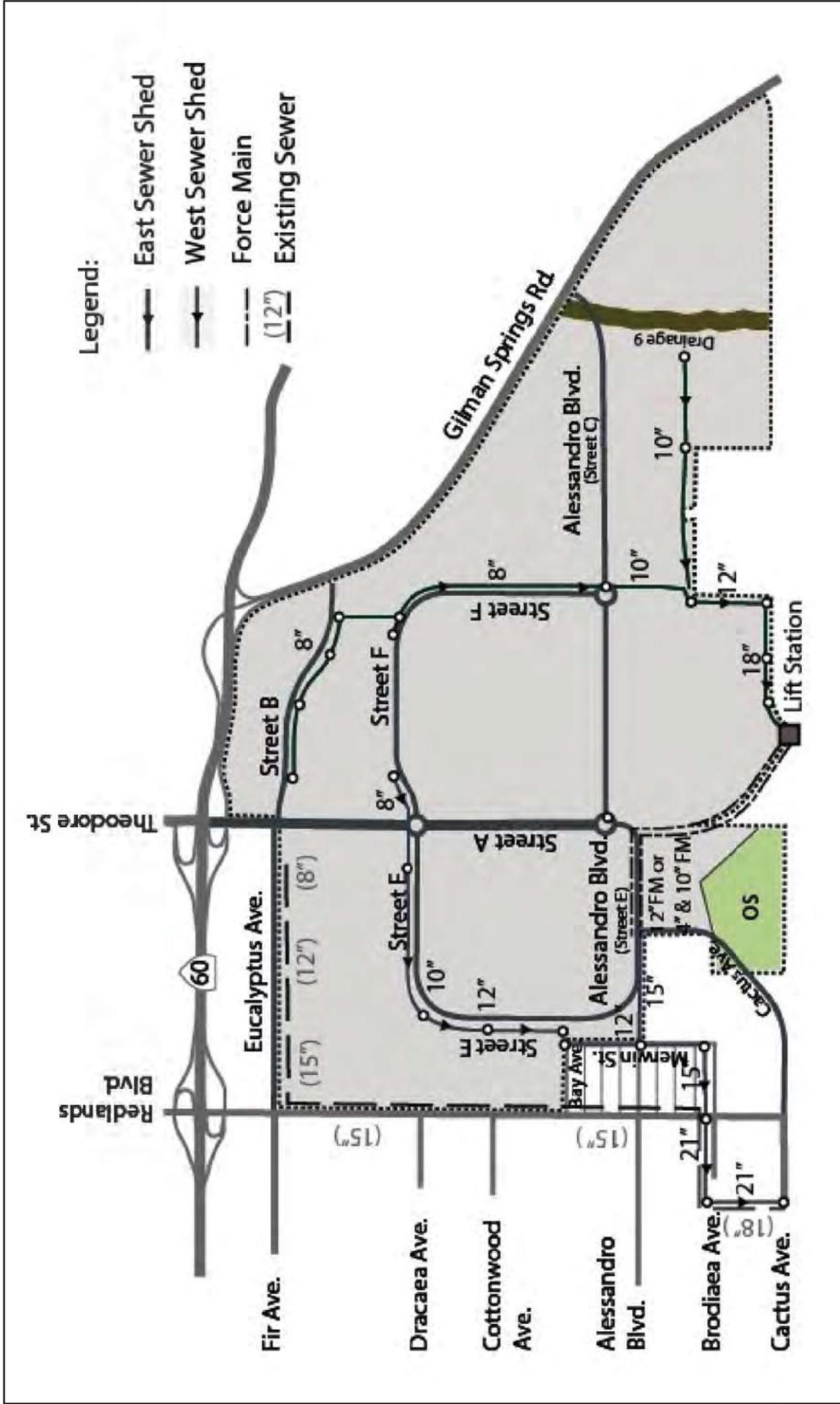
Storm Water Drainage. The project area is within the San Jacinto River watershed, which is part of the larger Santa Ana River watershed. The storm water runoff from the project generally flows in a southerly direction to the San Jacinto River at an average gradient of 1 to 2 percent. A topographic divide located west of Theodore Street (Street A) separates storm water flows to the San Jacinto River into two subareas. Runoff east of the divide flows through the San Jacinto Valley to the San Jacinto Wildlife Area and ultimately to the Gilman Hot Springs hydro-subarea. Runoff west of the divide flows to the Perris Valley Storm Drain and ultimately the Perris Valley hydro-subarea. Both hydro-subareas eventually flow to the San Jacinto River, approximately 10 miles south of the project site (Specific Plan Section 3.5.4).

The Riverside County Flood Control and Water Conservation District (RCFCWCD) is the responsible agency for the project area's regional flood control system. The westerly portion of the project site is located within the Moreno Master Drainage Plan (MMDP). An existing 12-foot by 8-foot reinforced concrete box (RCB) owned and maintained by RCFCWCD is located east of Redlands Boulevard. This facility collects storm water passing under SR-60 and outlets south of Eucalyptus Avenue where it flows through a spreading basin then across agricultural land. Farther south, the agricultural land drains to an RCFCWCD earthen channel at Redlands Boulevard flows to a greenbelt channel located south of Cactus Avenue and east of Redlands Boulevard and ultimately drains to the Perris Valley Storm Channel.

There is no master plan of drainage on the east side of the project site. The existing drainage facilities consist of open ditches along Theodore Street that convey runoff from adjacent areas and lands northerly of SR-60. A series of existing drainage culverts crosses Gilman Springs Road conveying the off-site runoff from the Badlands through the project site. Four of these culverts drain into natural drainage courses which drain to the south. Based on the latest Flood Insurance Rate Map (FIRM) published by the Federal Emergency Management Agency (FEMA), the project site is not located within a 100-year floodplain.

Development according to the Specific Plan will result in the placement of impervious surfaces on the project site, which would substantially increase the potential for runoff from the site. Post-development flows are required to be equal or less than pre-development flows, so the on-site storm

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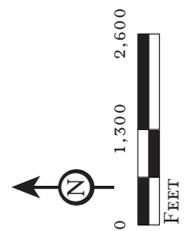


FIGURE 3.14

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water flows will be routed through a new system of underground drainage lines to a series of on-site detention basins. While the increase in impervious surfaces attributable to the proposed project would contribute to a greater volume and higher velocity of storm water flows, the hydrology report for the project indicates that the proposed detention basins would be designed to accommodate runoff and maintain off-site flows at pre-project conditions. Drainage improvements will be phased as needed to ensure that the peak flows at downstream discharge points at the southerly project boundary will not exceed the peak flows for the existing condition (Specific Plan Section 3.5.4). Figure 3.15 shows the proposed drainage system for the Specific Plan area. The drainage study is included in Appendix J.

Drainage from east of Gilman Springs Road flows southwest and south out of the Badlands and flows under Gilman Springs Road through corrugated steel pipe culverts. These culverts are relatively small, and during times of high flow, runoff often causes repeated localized flooding along the roadway. When Gilman Springs Road is improved to its ultimate width by the County, improvements will include the installation of larger culverts where needed to eliminate flooding along the roadway.

Solid Waste. The Specific Plan encourages recycling and reducing waste generation. Examples of the recycling processes identified by the Specific Plan include:

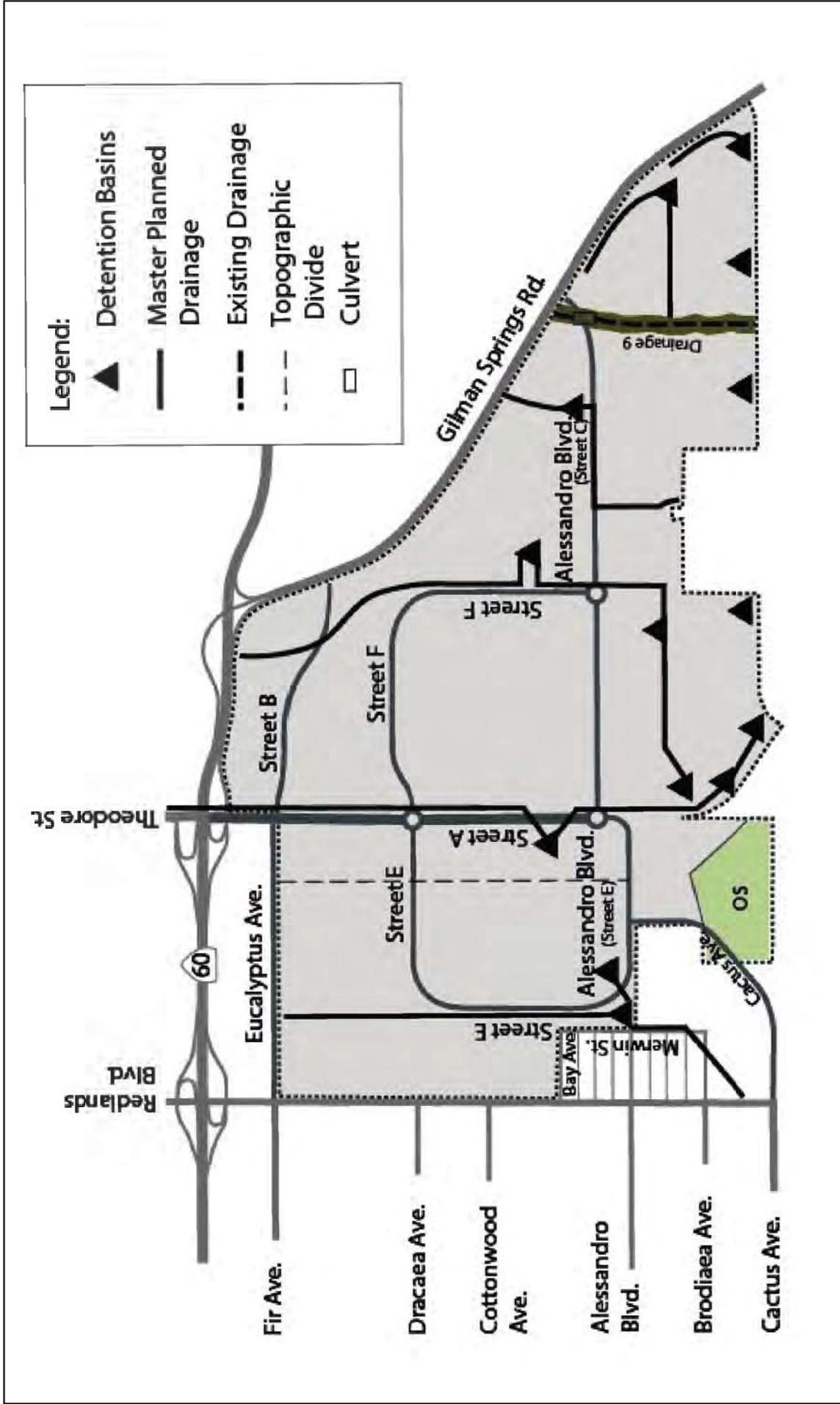
- Support recycling programs to sort and store materials destined for landfills;
- Reuse and recycle construction and demolition waste as much as feasible during building construction;
- Encourage the City of Moreno Valley to support by either implementing or expanding recycling and composting programs for businesses;
- Extend the types of recycling services offered (e.g., to include food and green waste recycling);
- Provide public education and publicity about recycling services conducted at the World Logistics Center; and
- Promote recycling programs aimed at supporting sustainable certification programs such as LEED, CalGreen, or similar sustainability programs.

Energy. Moreno Valley Electric Utility (MVEU) is the electricity provider for the World Logistics Center. While it will not provide service within the Specific Plan area, Southern California Edison (SCE) has existing 12 kV and 115 kV overhead power lines throughout the project area. There are SCE 115 kV power lines along Gilman Springs Road, Eucalyptus Avenue east of Theodore Street, Theodore Street north of Eucalyptus Street, and along Brodiaea Avenue/Davis Road to the south. There are also SCE 12 kV power lines along Gilman Springs Road, Theodore Street, Alessandro Boulevard, Eucalyptus Avenue east of Theodore Street, and Redlands Boulevard. MVEU has an existing underground electrical system at the intersection of Dracaea Avenue and Redlands Boulevard. As the project builds out, the Moreno Beach Substation will be expanded to 112 MW and a new 60 MW substation will be constructed to serve the project. Many of the existing 115 kV and 12 kV lines will be relocated as the Specific Plan is built out. Electrical facilities are shown in Figure 3.16.

Solar Energy. The Specific Plan requires solar photovoltaic (PV) arrays to be installed on the project buildings to offset the electrical power requirements of the office portion of each proposed warehouse building (WLCSP Section 12.7, Solar Commitment).

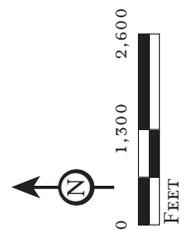
The SCGC is the natural gas provider for the project. An existing 4-inch medium pressure service line is located within Redlands Boulevard. Low-pressure facilities serve the residential area located west of Redlands Boulevard and southwest of Merwin Street and Bay Avenue. Throughout the project, natural gas is transmitted through existing SDG&E underground pipelines serving the Southern

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FIGURE 3.15



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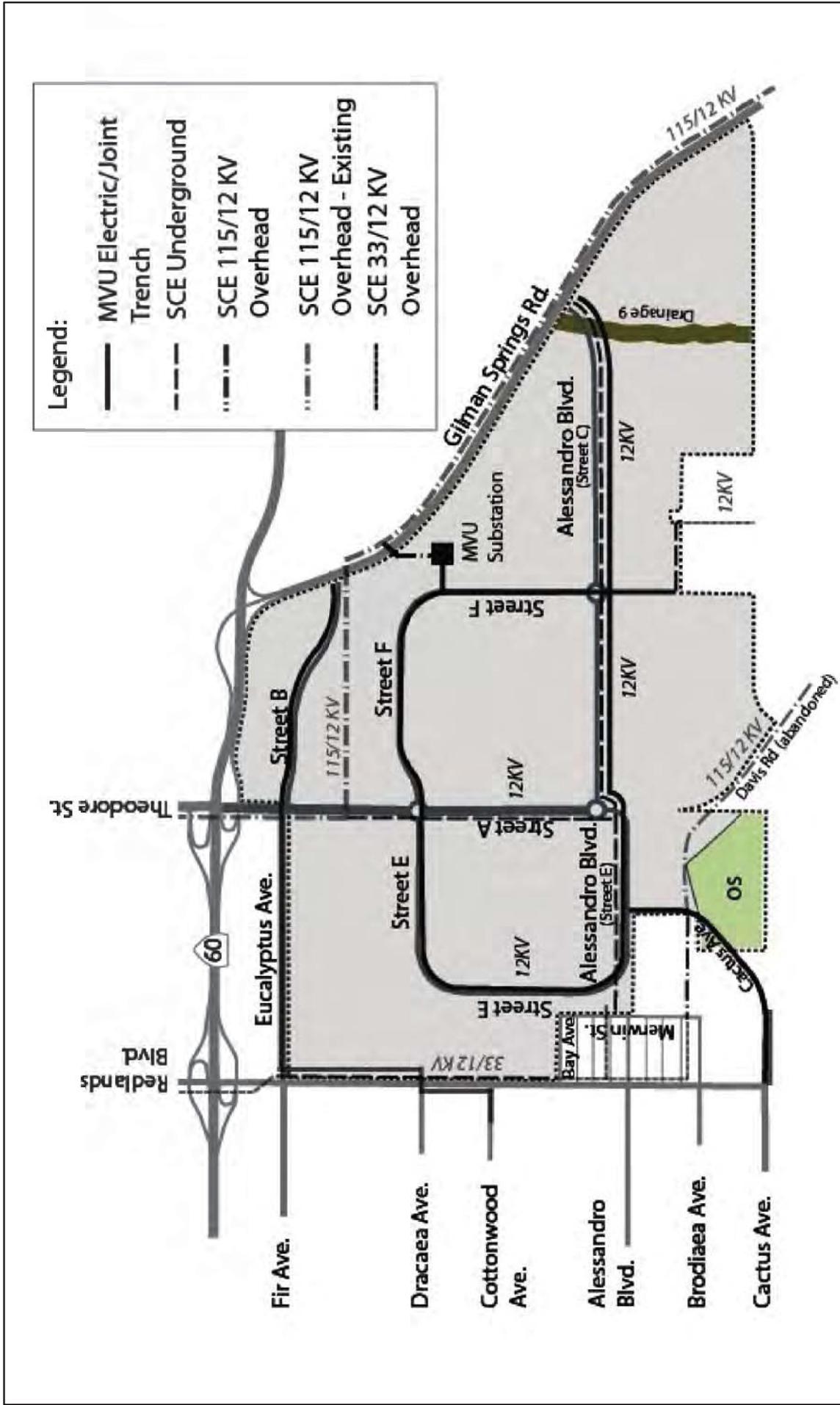
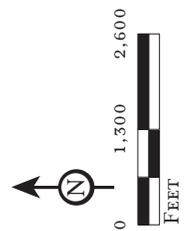


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California region that range in size from 16 inches to 36 inches. Two 30-inch diameter transmission pipelines run in an east-west direction north and south of Alessandro Boulevard. Three transmission pipelines, 16, 24, and 36-inch diameters run in a north-south direction along Virginia Street, south of Alessandro Boulevard. The 36-inch diameter line also extends east from Virginia Street parallel with the 30-inch line that runs south of Alessandro Boulevard. Figure 3.17 shows planned natural gas facilities.

SCGC transmission facilities in the Specific Plan area include a gas line blow-down facility and flow metering station at Alessandro Boulevard and Virginia Street. Farther south on Virginia Street, SDG&E operates the Moreno Compressor Station, which supplies gas to San Diego via 16, 30, and 36-inch transmission pipelines. In addition, Questar, a private utility company, has a 16-inch natural gas transmission line that runs within Alessandro Boulevard from Gilman Springs Road to Theodore Street, where it turns south to Maltby Avenue, and then turns west to Redlands Boulevard.

SCGC has indicated the 4-inch medium-pressure service line that runs in Redlands Boulevard will be extended into the area to service the development. Gas service will be installed in the public street right-of-way or easements as a joint trench with telephone, cable TV, and electrical services. In connection with the development of the property, relocation of some natural gas transmission lines into public street right-of-way or easements will be necessary. SDG&E's Moreno Compressor Station will remain in place.

3.4.6.4 Public Services

Fire protection services in the project area are provided by the Riverside County Fire Department under contract to the City of Moreno Valley. The Fire Department has an existing fire station located on Eucalyptus Avenue just east of Moreno Beach Boulevard. Response times to the project site from this station are approximately five (5) minutes. The Specific Plan indicates a new fire station will be located in the LD zone in the northeast portion of the site. At present, it is proposed in the north end of Planning Area 11, and the Specific Plan requires it to be built during Phase I. Placement of the fire station is subject to review and approval by the Fire Chief (Specific Plan Section 2.2.4 First Station Site). As development progresses, fire protection services within the Specific Plan area will continue to be evaluated through the plan development process, and additional facilities and/or services may be needed in the future.

Police service is provided to the project area by the Riverside County Sheriff's Department under contract to the City of Moreno Valley. At present, the City's main police station is at its design capacity, and additional capacity may be needed in the future. No new police facilities are planned on the project site at this time.

Park facilities and programs are provided by the City of Moreno Valley. There are no local parks in or adjacent to the project site at present and none are planned with the project. The Lake Perris State Recreation Area is located southwest of the project site.

School facilities and services are provided by the Moreno Valley Unified School District. No school sites are existing in or adjacent to the project site and none are planned.

Library facilities and services are provided to local residents by the City of Moreno Valley. No library facilities are proposed to be included in the Specific Plan area.

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3.4.7 Sustainability

Site and building design within the Specific Plan area will incorporate many sustainability and green building concepts. Green building is the practice of increasing building efficiency through site planning, water and energy management, material use, control of indoor air quality, and the use of innovative design concepts. These practices help to improve building operational efficiency, conserve water, reduce waste, and lessen the heat island effect of development.

All buildings within the project will comply with the Title 24 California Building Code. Adopted in 1978 in response to the energy crisis of the 1970s and updated every five years by the California Energy Commission (CEC), California's Title 24 contains the strictest and most energy-efficient building code in the nation. The Title 24 Building Codes are called California's "Green Building" codes because they create energy efficiencies of up to 30 percent in some categories above and beyond the energy efficiencies achieved under the previous versions of Title 24.

The 2013 version of standards went into effect January 1, 2014. The CEC adopted these changes to the Building Energy Efficiency Standards for the following reasons:

1. To provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy.
2. To respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates California reduce its greenhouse gas emissions to 1990 levels by 2020.
3. To pursue California policy that energy efficiency is the resource of first choice for meeting California's energy needs.
4. To act on California's Integrated Energy Policy Report (IEPR) findings that Standards are the most cost-effective means to achieve energy efficiency, that the Building Energy Efficiency Standards will continue to be upgraded over time to reduce electricity and peak demand, and that the Standards will play a role in reducing energy related to meeting California's water needs and in reducing greenhouse gas emissions.
5. To meet the Executive Order in the Green Building Initiative to improve the energy efficiency of nonresidential buildings through aggressive standards.

The Specific Plan requires sustainable development standards so that new development within the project area minimizes energy consumption, conserves water, and uses recycled or sustainable building materials, where feasible. It provides developers with a specific framework for identifying and implementing a variety of practicable and measurable green building design, construction, operations, and maintenance. All new development within the project area will be required to be designed to meet the CEC standards in effect at the time construction commences (WLCSP Section 1.3.2). In addition, buildings within the Specific Plan will be designed to be "solar ready" (i.e., allow the installation of solar photovoltaic systems on the roof of each building) (WLCSP Section 1.2.2, Green Building – Sustainable Development).

The sustainability guidelines for the World Logistics Center serve the following functions to:

- Assist in meeting California's greenhouse gas reduction targets as set forth through Executive Order S-3-05 and Assembly Bill 32 (also known as the Global Warming Solutions Act of 2006);
- Assist in the region's development of a sustainable communities strategy pursuant to Senate Bill 375;
- Assist in meeting other state and local goals and requirements, including Assembly Bill 1385, The Complete Streets Act;

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- Establish practical and innovative solutions for the developer, business, and residential community to improve resource efficiency and reduce consumption of energy, water, and raw materials; and
- Support waste management reduction identified in AB 341.

3.4.7.1 Building Design and Construction

The Specific Plan requires sophisticated construction techniques that will provide pollution prevention and control such as noise, air quality, erosion, and sediment controls. Both site planning and future building design will require best practices for use of recycled materials and products, such as recycled steel, and crushed concrete and pavement materials.

Low-emitting volatile organic compound (VOC) building materials will be required to be used on site. Project design will allow the incorporation of alternative energy sources such as rooftop solar systems (i.e., “solar ready” buildings) or other technologies reasonably available at the time of development. Project design and construction techniques will be employed to reduce the heat island effect, which creates thermal gradient differences between developed and undeveloped areas. Such techniques will include the use of materials that have a low solar reflectance index such as white roofs and light-colored pavements.

All development within the Specific Plan will require the preparation of a waste management plan requiring the diversion of at least 50 percent of waste from landfill. This goal will be achieved through a comprehensive recycling and management program including storage and collection of recyclables, building and material reuse, and careful construction waste management.

The Specific Plan will incorporate the use of passive heating and cooling into the design or modification of the high-cube warehouse development (e.g., white building colors and roof insulation to minimize heat gain, and landscaping to help shade buildings).

Electrical power sources will be provided both indoors and outdoors to accommodate the use of electrical property maintenance equipment (Section 12.4 of the WLCSP).

3.4.7.2 Landscaping

The Specific Plan requires development to install xeriscape or drought-tolerant landscaping that requires minimal irrigation and to utilize on-site runoff into landscaped areas as much as possible for landscape irrigation.

3.4.7.3 Water Usage

Under the requirements of the Specific Plan, the project will employ water reduction and conservation principles, which will include advanced irrigation systems, drought-tolerant plants, the use of mulch, recycled and other permissible alternative sources of water, and turfless plantings with alternative landscaping materials such as rock and other materials that do not require potable water sources. The final design will be used to calculate the site’s water demand. The annual maximum allowable water budget (AMAWB) will be compared to the estimated annual water use (EAWU) to ensure that the design meets EMWD guidelines.

3.4.7.4 Storm Water Quality

Through implementation of the design standards in the Specific Plan, the project will incorporate storm water quality measures including infiltration basins, bioretention facilities, and extended detention basins to reduce pollutants in storm water (Specific Plan Section 5.1.8.5). Future development projects will be required to implement a Water Quality Management Plan (WQMP) in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit Board Order R8-2010-0033. The current approved Riverside County WQMP for Urban Runoff addresses the Municipal Separate Storm Sewer Systems (MS4) NPDES permit. The most recent WQMP for the Santa Ana Region of Riverside County addresses the latest MS4 NPDES permit requirements. Projects identified as a “Priority Development Project” will be required to prepare a project-specific WQMP. The MS4 Permit mandates a Low Impact Development (LID) approach to storm water treatment and management of runoff discharges. Site-specific projects will be designed to minimize imperviousness, detain runoff, and infiltrate, reuse, or evapotranspire runoff where feasible. LID design will be used to infiltrate, evapotranspire, harvest and use, or treat runoff from impervious surfaces, in accordance with the *Design Handbook for Low Impact Development Practices*.

The project should also ensure that runoff does not create any hydrologic conditions of concern. The Regional Water Quality Control Board (RWQCB) continuously updates impairments as studies are completed. The most current version of impairment data should be reviewed prior to preparation of the Preliminary and Final Project-Specific WQMP (WLC Specific Plan Section 5.1.8, *Water Quality Site Design*).

The WLC Specific Plan contains extensive site design, source control, and treatment control Best Management Practices (BMPs) that will be analyzed in detail in Section 4.9, *Hydrology and Water Quality* of this EIR.

3.4.8 Architectural Design Guidelines

Sections 4.1 and 5.3 of the Specific Plan contain the architectural and building design standards that will be applicable to all future off-site conditions and specific on-site development proposals. The design standards provide for attractive, functional, compatible contemporary designs, which can also minimize energy consumption and the production of greenhouse gases, helping to reduce the project’s contribution to global climate change. These Specific Plan sections include typical building elevations, cross-sections, and photographic renderings that illustrate how future development will appear. The architectural guidelines also address project details such as building setbacks, walls, fences, building materials, and colors.

Section 2.0 of the Specific Plan establishes building height limitations throughout the project, as shown in previously referenced Figure 3.9. Building heights are limited to 60 feet for buildings located along the north, west, and southern boundaries of the project and 80 feet along Gilman Springs Road and in the interior. The WLC Specific Plan contains a provision that portions of buildings could be raised an additional 10 percent to accommodate interior facilities (i.e., elevator shafts) and architectural design elements, which may be approved through the administrative variance process.

3.4.9 Landscaping Design Guidelines

Sections 2.5, 4.2, and 5.4 of the Specific Plan provide landscaping guidelines for the project. The intent of these guidelines is to develop a landscape program that reduces the use of mechanical irrigation systems, maximizing the collection and use of rainfall to irrigate carefully designed landscape areas. The Specific Plan includes a plant palette specifically designed for the project site to consume significantly less water than conventional landscaping concepts. The Specific Plan contains an extensive palette of drought-tolerant plants.

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The Specific Plan calls for a more substantial landscape treatment to be installed along the perimeter of the site. These special edge treatment areas will be along the western boundary of the project site, north along SR-60, east along Gilman Springs Road, and along the southern boundary of the project adjacent to the SJWA. These areas have been designed to provide an aesthetic buffer and soften views between the surrounding land uses and the planned warehouse buildings and truck activity areas. Further description of the special edge treatment areas can be found in the Section 2.5 of the WLCSP and DEIR Section 4.1.6 and in DEIR Figure 4.1.6A. For areas not along the perimeter, landscaped areas would be grouped by water needs. Irrigation systems would be designed to irrigate at no more than 70 percent² of the plant groups' reference evapotranspiration rate (minimum required water for the plant groups' survival), and would be designed to minimize water runoff onto sidewalks or streets. The project will direct runoff to landscaped areas and employ techniques to promote percolation and water capture at the root zone, reducing the need for mechanical irrigation.

Section 5.4.2 of the WLCSP requires future development to consider the following water conservation measures: macro and micro climates, solar exposure, prevailing wind conditions; site analysis of, seasonal temperature patterns, soils and drainage, grades, and slopes; use of historical evapotranspiration rates and weather station (CIMIS) data; use of planting zones coordinated according to plant type, climatic exposure, soil condition and slope to facilitate use of zoned irrigation systems; use of low water or drought-tolerant plant species in landscape areas served by potable water; audit of water use and certification by a licensed landscape architect that the irrigation system was installed and operates as designed; use of reclaimed water systems if available and practical, use of best available irrigation technology to maximize efficient use of water, including moisture sensors, multi-program electronic timers, rain shutoff devices, remote control valves, drip systems, backflow preventers, pressure reducing valves and matched output sprinkler heads; use of gate valves to isolate and shut down mainline breaks; design to meet peak moisture demand of all plant materials within design zones, while avoiding flow rates that exceed infiltration rate of soil; design to prevent overspray or discharge onto roadways, non-landscaped areas or adjacent properties; and timing of irrigation cycles to operate at night when wind, evaporation, and human activities are at a minimum.

3.4.10 Lighting Design Guidelines

Section 5.5 of the Specific Plan contains guidelines for site lighting within the Specific Plan. The regulations prohibit direct light spillage onto adjacent properties, especially the San Jacinto Wildlife Area to the south (Specific Plan Sections 4.3 and 5.5), while providing sufficient light for nighttime activities and project security. The project will incorporate the design standards adopted by Ordinance 851 which established stricter controls on outdoor lighting.

3.4.11 Off-site Improvements

Development within the Specific Plan will require various infrastructure improvements, some of them located off site. Local roadways and intersections affected by project traffic will be improved as outlined in the project Traffic Impact Analysis (TIA). Electrical service will be extended from the Moreno Beach substation to the project. Electric power lines along Gilman Springs Road will be relocated when that road is widened. Providing potable water to the site will require the construction of three new reservoirs, one north of SR-60 off of Theodore Street, one east of Gilman Springs Road near the northeast corner of the site one in the northwestern portion of the project (see Figure 3.13). The Cactus extension will extend east through a portion of the Open Space area, then turn north to intersect with Alessandro Boulevard (see Figure 3.10), and a four-inch gas line will be constructed within this street extension (see Figure 3.10). A 21-inch sewer line will be extended to the west from

² Per the California Code of Regulations, Title 23 Waters Division, Department of Water Resources, Ch. 2.7 Model Water Efficient Landscape Ordinance, the County of Riverside Water Efficient Landscape Requirements Ordinance No. 859, and the Eastern Municipal Water District (EMWD) 2010 Urban Water Management Plan, or current Urban Water Management Plan.

the southwest corner of the site (see Figure 3.14) from Cactus Avenue. The existing County drainage channel near the southwest corner of the site will be improved to handle increased flows from project runoff. At such time as traffic demand dictates, the Theodore Street interchange on SR-60 will be reconstructed to accommodate project traffic. All of the off-site improvements needed to support development of the Specific Plan are shown in previously referenced Figure 3.7. This EIR examines the impacts of these off-site improvements on approximately 104 acres of off-site land that they affect.

NOTE: The analysis of environmental impacts from the project, including biological resources, cultural resources, geotechnical constraints, air quality, greenhouse gases, noise, etc., also address development of these offsite improvement areas as well as development of the WLCSP property.

3.4.12 Grading and Excavation

Approximately 42 million cubic yards (cy) of cut and fill will be required to rough/mass grade the entire project site, including remedial grading and overexcavation. Earthwork will balance on site within the Specific Plan, eliminating the need to import or export dirt for the project. See Figure 3.18 for the conceptual grading plan.

3.4.13 Phasing

Development of the Specific Plan is planned over a period of fifteen years, from 2015 through 2030. Under this projected development schedule, the project will absorb an average of approximately 2.7 million square feet of new development each year from 2015 to 2030, with actual development phasing based on future market conditions. Section 8.0 of the Specific Plan, *Project Phasing*, suggests that development will likely occur in two large phases, starting in the western portion of the site south of Eucalyptus Avenue. This phasing concept is based on beginning construction where infrastructure presently exists and expanding southerly and easterly. It is anticipated that Phase 1 would be completed by 2022 and would contain approximately 50% of development or approximately 20,300,000 square feet of logistics warehouse uses. Phase 2 anticipates full development build-out by 2030. Figure 3.19 shows the proposed phasing plan.

As stated in the Specific Plan, project phasing predictions are conceptual. The actual amount and timing of development will be dependent upon numerous factors, many of which are outside the control of the City or the developer, including interest by building users, private developers and local, regional, and national economic conditions. These and other factors acting together will ultimately determine the location and rate at which development within the project area occurs.

City adoption of the project will establish the framework for development of the area in accordance with the Specific Plan, which identifies the type and intensity of land uses permitted within the project. It is anticipated that development of the project would occur over time, as the result of the construction of multiple separate independent projects of varying sizes and configurations. Each of these future projects would be required to be consistent with the General Plan and zoning and would comply with all applicable regulations of the Specific Plan. Table 3.E provides an estimate of the rate at which the project area could be built out, consistent with the Specific Plan, and estimated levels of construction projected to occur during each phase of development. Table 3.E also includes the approximate amount of equipment anticipated to be used during construction of the project.

NOTE: The analysis of environmental impacts from the project, including biological resources, cultural resources, geotechnical constraints, air quality, greenhouse gases, noise, etc., addressed development of these offsite improvement areas as well as development of the WLCSP property.

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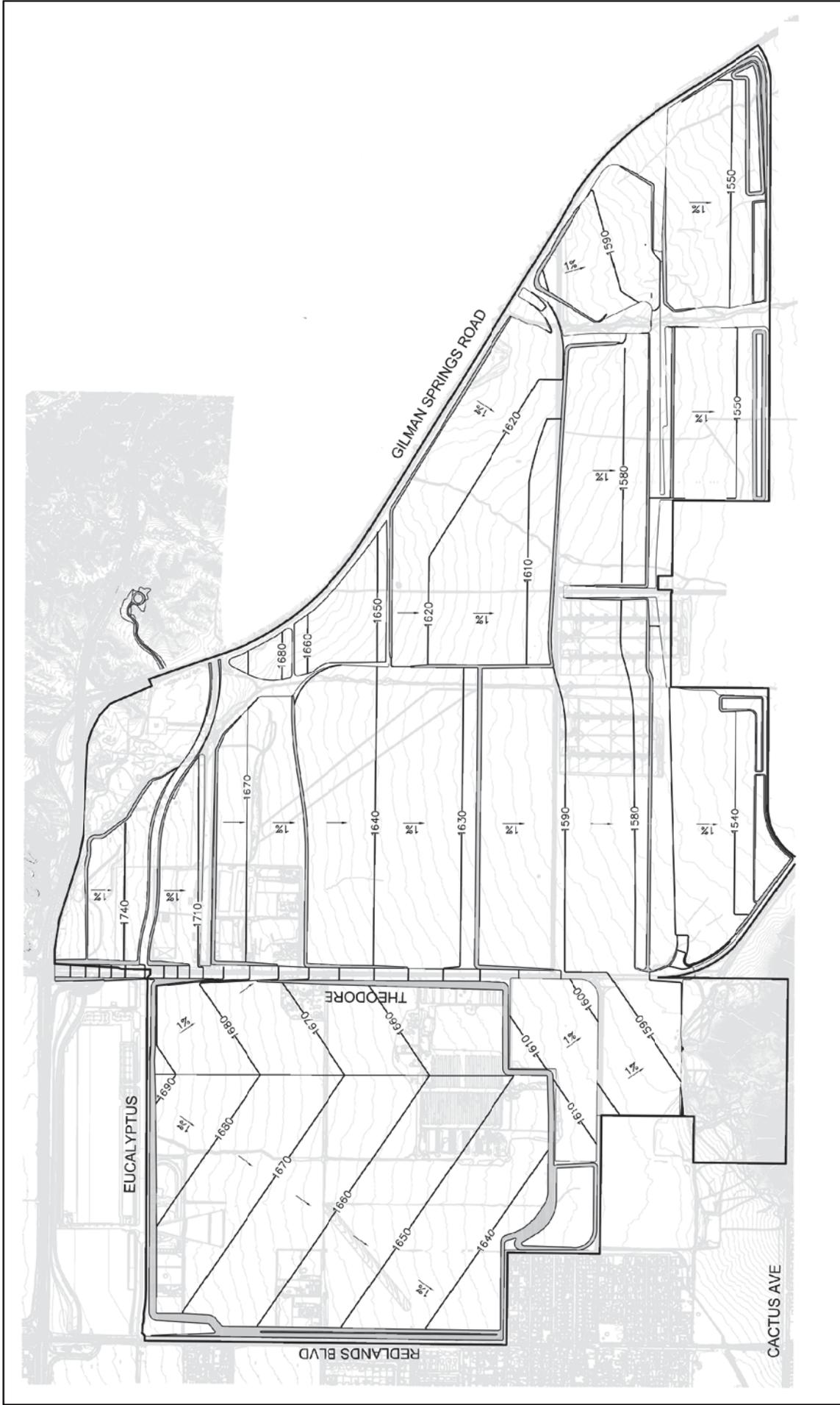
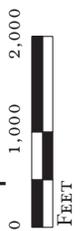
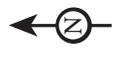


FIGURE 3.18

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SOURCE: RBF Consulting, 2014

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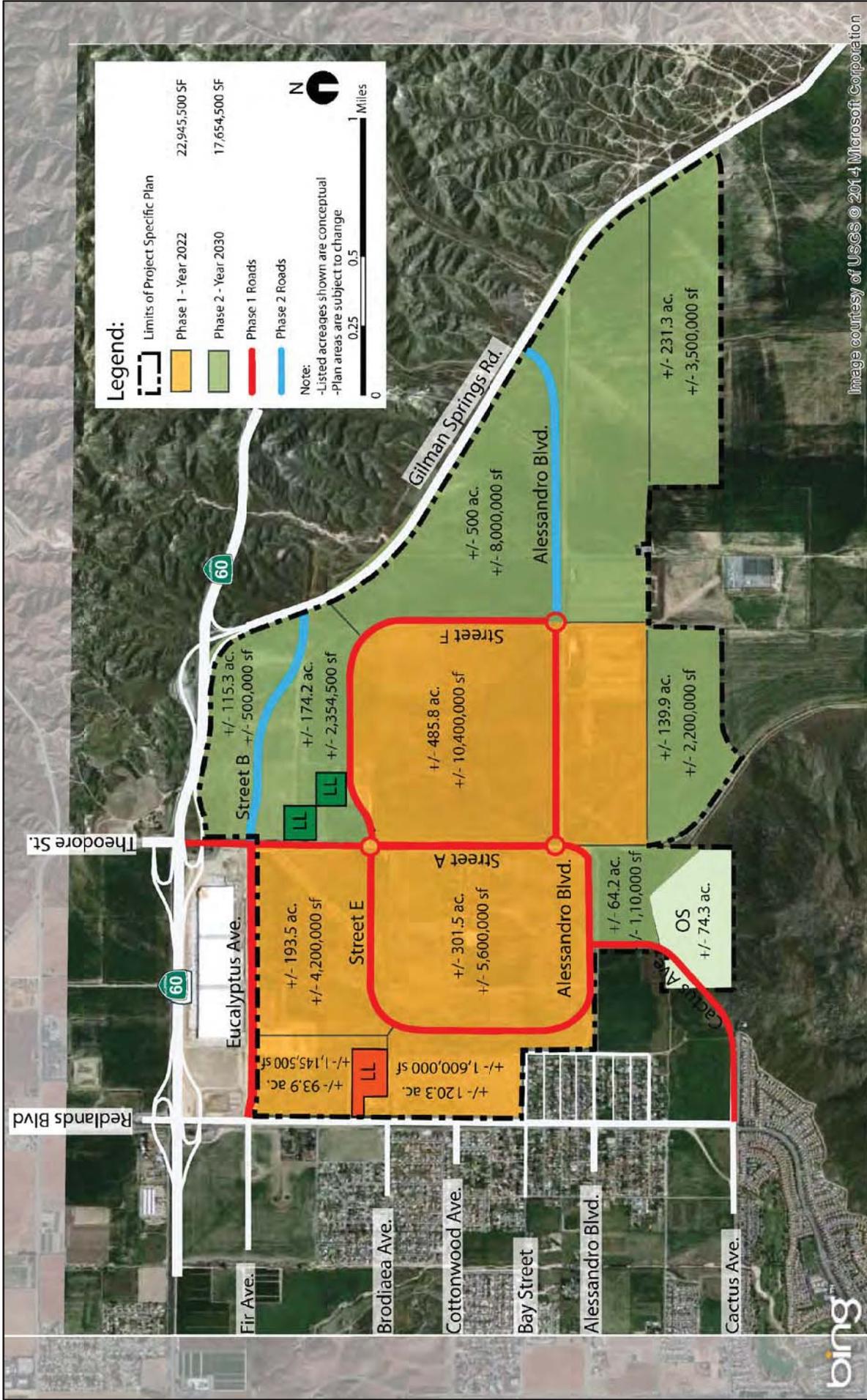


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Table 3.E: Estimated Construction Equipment and Phasing (2015–2030) revised per new phasing plan

Activity/Equipment	#	Duration (months)	Phase 1–		Phase 2–	
			Start	End	Start	End
Mass Grading/Excavation						
Dozers (D8R, D9, D10)	4-21	96	The equipment will be used from January 1 to December 31 during the following years: 2015, 2017, 2019, and 2021		For the years 2022 to 2024 equipment will be used from October 1 to March 31 of the following year.	For the years 2027, 2028, and 2030 equipment will be used from January 1 to June 30.
Scraper (651E)	6-30					
Compactor (824C, 834)	2-6					
Motor Grader (140G)	1-3					
Service/Support Truck	7-27					
Other Dozers (D6M, 550)	2-9					
Other ¹	8-18					
Finish Grading						
Dozer (D6M, 550)	3-9	32	Equipment will be used two months out of the following years 2015, 2017, 2019, and 2021		Equipment will be used two months out of the following years 2022, 2023, 2024, 2025, 2027, 2028, and 2030	
Backhoe (420D)	1-3					
Water Truck	1-3					
Service/Support Truck	1-3					
Building						
Backhoe (590)	6	186	July 1, 2015	December 31, 2021	January 1, 2022	December 31, 2030
Concrete Truck	36					
Excavators (9060, 270, 240, mini)	16					
Material Delivery Trucks	11					
Forklift (420 and 544D)	10					
Case and Skip Loaders ²	28					
Service/Support Truck	24					
Other ³	12					
Utilities						
Excavators ⁴	26-30	186	July 1, 2015	December 31, 2021	January 1, 2022	December 31, 2030
Loaders	8					
Water Truck	17					
Backhoe (420)	2					
Service/Support Trucks	18					
Delivery Trucks	10					
Concrete Trucks	8					
Other ⁵	4-8					
Interchange						
Dozer (D9, D10)	1	18	January 1, 2020	September 30, 2021	--	--
PW Scraper (623)	1					
Excavator (324)	1					
Backhoe (430)	1					
Crane	1					
Concrete Truck	4					
Service/Support Truck	4					
Drill Rig	1					
Dump Truck	5					
RT Wheel Loader (950)	1					

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Table 3.E: Estimated Construction Equipment and Phasing (2015–2030) revised per new phasing plan

Activity/Equipment	#	Duration (months)	Phase 1–		Phase 2–	
			Start	End	Start	End
Concrete Screed Mach.	1					
Skip Loader (414)	1					
Dozer (D5, D6)	1					
Motor Grader (14M)	1					
Curbing						
Curb Machine/Screed	2	62	July 1, 2015 ³	December 31, 2021	January 1, 2022	December 31, 2030
Skip Loader (210)	1					
Concrete Truck	6					
Service/Support Truck	4					
Paving						
Roller/Paving/Blade/Scraper	10	32	January 1, 2015 ⁴	December 31, 2021	January 1, 2022	December 31, 2030
Skip Loader	4					
Bottom Dump Truck	4					
Delivery Truck	7					
Service/Support Truck	6					
Landscaping						
Loader (310G, 210LE, 544J)	6	186	January 1, 2015	December 31, 2021	January 1, 2022	December 31, 2030
Water Truck	2					
Excavator (mini) /Lift (544D)/ Steer (S190R)	6					
Trencher (RT-45)	2					
Service/Support Truck	14					

Source: Highland Fairview, February 2014

1. Includes: Water Puller, 420D Backhoe, water trucks, support trucks
2. Includes: 414, 721, cat skip loader, 310G, 210LE, 544J
3. Includes: boom pump/truck, water truck, trencher, skid steer, water truck
4. Includes: 65,000 lbs to 175,000 lbs, 250G, and cat mini
5. Includes: dump truck, crane, fork lift

3.4.14 Construction Hours

Similar to the Highland Fairview Corporate Park, construction of warehousing buildings within the Specific Plan will occur on a 24 hour-a-day, 7 day-a-week basis. This is necessitated by the extensive use of poured concrete in the construction of building sites and the logistics buildings themselves. Major concrete pours are most efficiently and economically done in the cooler night and early morning hours. Additionally, the large number of concrete delivery trucks necessary for this construction has a minimal traffic impact in the nighttime hours.

The City's Municipal Code contains the following language regarding construction hours:

Section 8.14.040 Hours of Construction. Any construction within the city shall only be as follows: Monday through Friday (except for holidays which occur on weekdays), six a.m. to eight p.m.; weekends and holidays (as observed by the city and described in Chapter 2.55 of this code),

³ Two months a year

⁴ Four weeks a year

seven a.m. to eight p.m., unless written approval is obtained from the city building official or city engineer.

Section 8.21.050 Time of Grading Operations. *Grading and equipment operations shall only be completed between the hours of seven a.m. and six p.m. Monday through Friday, excluding holidays and from eight a.m. to four p.m. on weekends and holidays. The city engineer may, however, permit grading or equipment operations before or after the allowable hours of operation if he or she determines that such operations are not detrimental to the health, safety, or welfare of residents or the general public. Permitted hours of operations may be shortened by the city engineer's finding of a previously unforeseen effect on the health, safety, or welfare of the surrounding community.*

If necessary, future developers within the WLCSP can apply to the City for extended hours of operation under the Municipal Code guidelines, as outlined in Condition of Approval #7 for the Highland Fairview Corporate Center (Skechers):

Construction and Demolition. No person shall operate or cause the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between the hours of eight p.m. and seven a.m. the following day such that the sound there from creates a noise disturbance, except for emergency work by public service utilities or for other work approved by the city engineer or designee.

3.4.15 Specific Plan Implementation

Although financial and economic parameters of a project are not typically included in an EIR, the size and complexity of the Specific Plan project dictate that a certain amount of this information be included in the EIR to demonstrate that the project is feasible and that the City will not incur undue risk relative to the installation of public infrastructure and other facilities and services (Specific Plan Section 11.0).

Funding for the transportation, infrastructure, and other improvements identified in the Specific Plan would be provided by a variety of sources. For example, Highland Fairview would construct certain backbone roads at the outset of project development; future development would install road connections and on-site improvements. All projects would contribute to the City's Development Impact Fee (DIF) program to help fund future roadway improvements in the immediate surrounding City area. In addition, future development would contribute to the County's Transportation Uniform Mitigation Fee (TUMF) program to fund identified regional improvements such as the SR-60 ramps at Redlands Boulevard. The Specific Plan contains a discussion of potential financing measures and mechanisms the City would need to enact, adopt, or participate in for the proposed infrastructure improvements.

One of the available regional infrastructure funding mechanisms is the TUMF managed by the Western Riverside Council of Governments (WRCOG). The primary purpose of the TUMF program is to fund regional transportation improvements. The TUMF program has become a key way to ensure that growth does not create gridlock on regional and local thoroughfares. Under the TUMF program, Western Riverside County is divided into five zones, with the Specific Plan located in the "Central" zone. The TUMF is structured so that 48.7 percent of funds generated in each zone go back to that zone to be programmed for projects. Another 48.7 percent is allocated to regional inter-zone projects programmed by the Riverside County Transportation Commission (RCTC), and 2.6 percent is allocated for regional transit projects programmed by the RTA. TUMF-eligible roadways within the proposed project include Redlands Boulevard, Alessandro Boulevard, Gilman Springs Road, and freeway interchanges at Gilman Springs Road and Redlands Boulevard.

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World Logistics Center Project**

The City of Moreno Valley has implemented a Capital Improvement Program (CIP) that is closely linked to the City DIF program. According to the 2011–2012 CIP, the City has experienced a reduction in DIF as well as other development-related funding sources. The current CIP reflects the new projects that have been funded. DIF funding is collected for “Arterial Streets,” “Interchange Improvements,” and “Traffic Signals.” The CIP describes approximately \$1.66 billion in capital projects through build out of the City.

There are several identified CIP projects within the project area including traffic signals along Alessandro Boulevard at Redlands Boulevard, Sinclair Street, Theodore Street, Virginia Street, and Gilman Springs Road; Eucalyptus Avenue at Redlands Boulevard, Sinclair Street, Theodore Street, Virginia Street, and Gilman Springs Road; SR-60 eastbound ramps at Theodore Street, and westbound ramps at Theodore Street and Redlands Boulevard. Future street improvements within the project area include SR-60 interchanges at Redlands Boulevard and/or Theodore Street, and Gilman Springs Road; although these are included in the City CIP program, the funding sources are TUMF and private developer contributions. Other future CIP identified street improvements include Alessandro Boulevard through the project area, Eucalyptus Avenue, Gilman Springs Road (within the city limits), Theodore Street, and Virginia Street. Updates to the CIP program may include future streets within the WLC project.

3.5 GENERAL PLAN AMENDMENT

Approval of the project includes amendments to the following General Plan text and Elements to incorporate the many aspects of the WLC Specific Plan (also see Figures 3.20a-j):

1. Community Development Element

- a. Revise Land Use Map (Figure 2-2) to include WLCSP land plan
- b. Revise Section 2.1.3

~~... intersection of Virginia Street and Gato del Sol. The acquisition encompasses about one third of the land within the Moreno Highlands Specific Plan.~~

~~Neither of the aforementioned land purchases are likely to be developed as envisioned in the original specific plan, and are likely to remain substantially vacant. In that the Moreno Highlands Specific Plan Development Agreement precludes the City from making unilateral changes to the specific plan land use plan, no changes were recommended for the Moreno Highland Specific Plan as part of the General Plan Update.~~

2. Parks, Recreation and Open Space Element

- a. Revise Open Space Map (Figure 4-1) (page 4-2) to include WLCSP.
- b. Revise Future Parkland Acquisition Areas map (Figure 4-2) (page 4-6).
- c. Revise Master Plan of Trails (Figure 4-3) (page 4-13) to include WLCSP.

3. Circulation Element

- a. Revise discussion on Industrial Development (Section 5.3.2.2).

Industrial and business park development is concentrated in the southern part of the City, located south of Iris Avenue and north of San Michele Road to the Perris city limits, and in the eastern part of the City, generally between Redlands Boulevard and Gilman Springs Road. This development ... (page 5-7)



**FIGURE 9-4
BIKEWAY PLAN**

Bikeway Classification

- Class I
- Class II
- Class III
- Roads
- Highways
- March ARB
- Waterbodies



Date: July 11, 2006
 State Plane NAD83 Zone 6
 File: G:\arcmap\planning\gen_plan_update\sh
 bikeway.mxd

GEOGRAPHIC INFORMATION SYSTEMS

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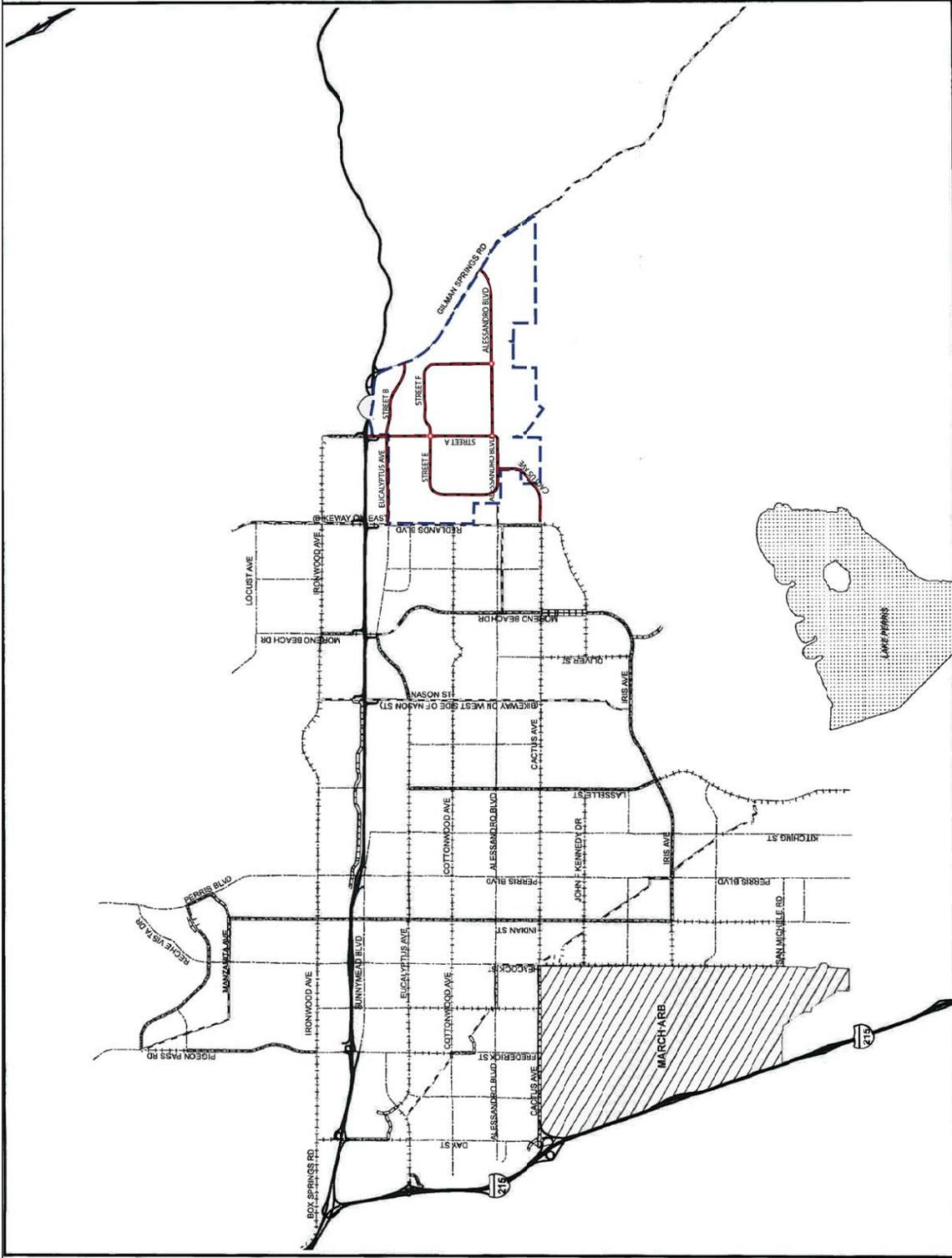


FIGURE 3.20.A
 World Logistics Center Specific Plan Project
 Environmental Impact Report
 General Plan Amendment

LSA

SOURCE: Moreno Valley, September, 2014.
 I:\HFV120\Reports\ER\figs-20a_GeneralPlanAmendment.mxd (10/30/2014)

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**FIGURE 9-1
CIRCULATION PLAN**

Street Classification

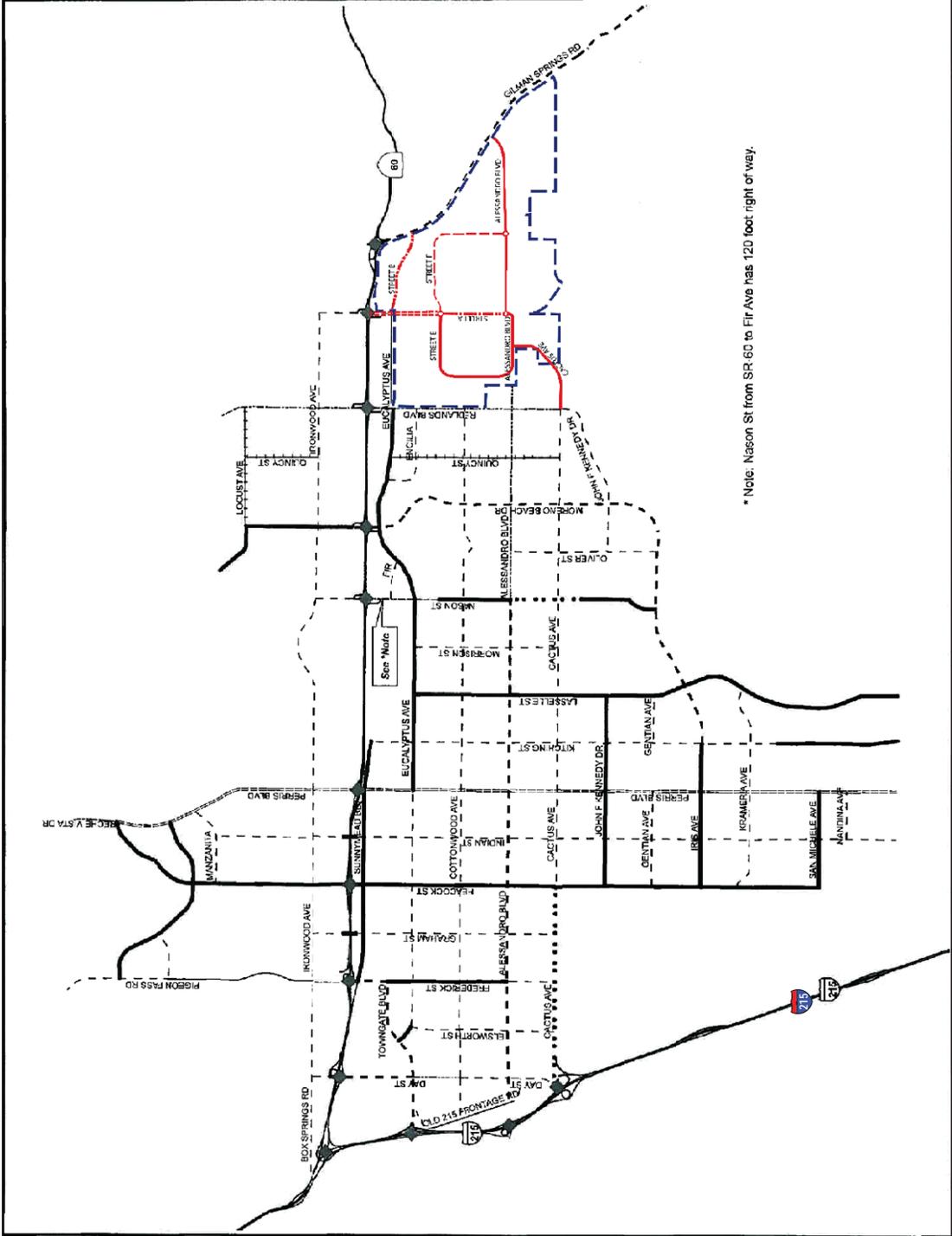
- Freeway
- Divided Major Arterial
- Reduced Cross Section
- Divided Arterial - 8 lane
- Divided Arterial - 4 lane
- Arterial
- Minor Arterial
- Minor Arterial - Pigeon
- Pass Cross Section
- Collector
- Freeway Overpass
- Freeway Interchange



Date: July 11, 2008
 State: California
 File: G:\arcmap\hnp\hnp\plan_updates\circ_plan_fig91.mxd

GEOGRAPHIC INFORMATION SYSTEMS

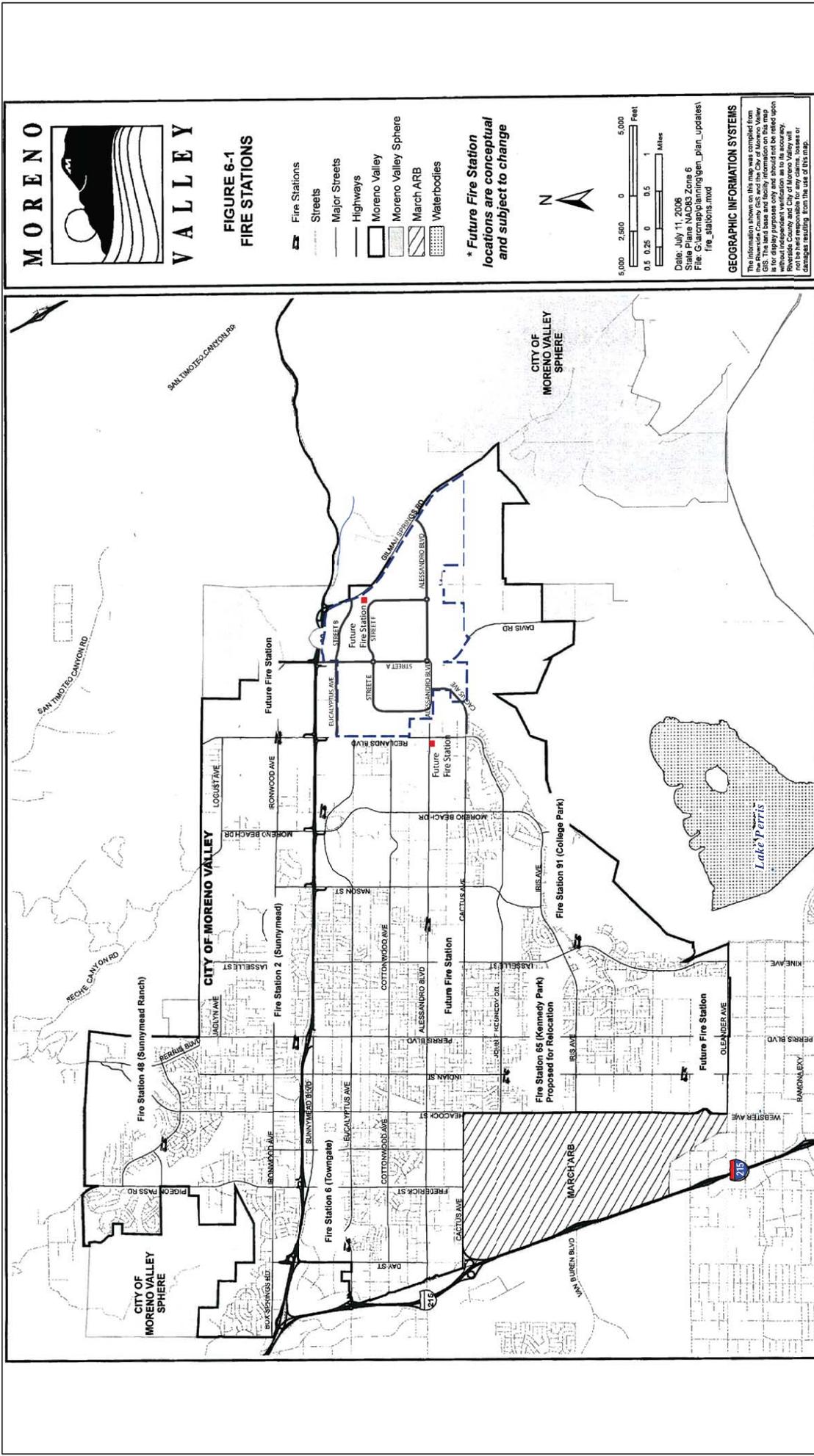
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* Note: Nason St from SR 60 to Fir Ave has 120 foot right of way.

FIGURE 3.20h

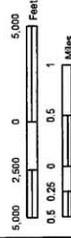
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**FIGURE 6-1
FIRE STATIONS**

- Fire Stations
- Streets
- Major Streets
- Highways
- Moreno Valley Sphere
- March ARB
- Waterbodies

*** Future Fire Station locations are conceptual and subject to change**



Date: July 11, 2008
 State Plane: NAD83 Zone 6
 File: G:\arcmap\planning\gen_plan_updates\fire_stations.mxd

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FIGURE 3.20c

World Logistics Center Specific Plan Project
 Environmental Impact Report
 General Plan Amendment

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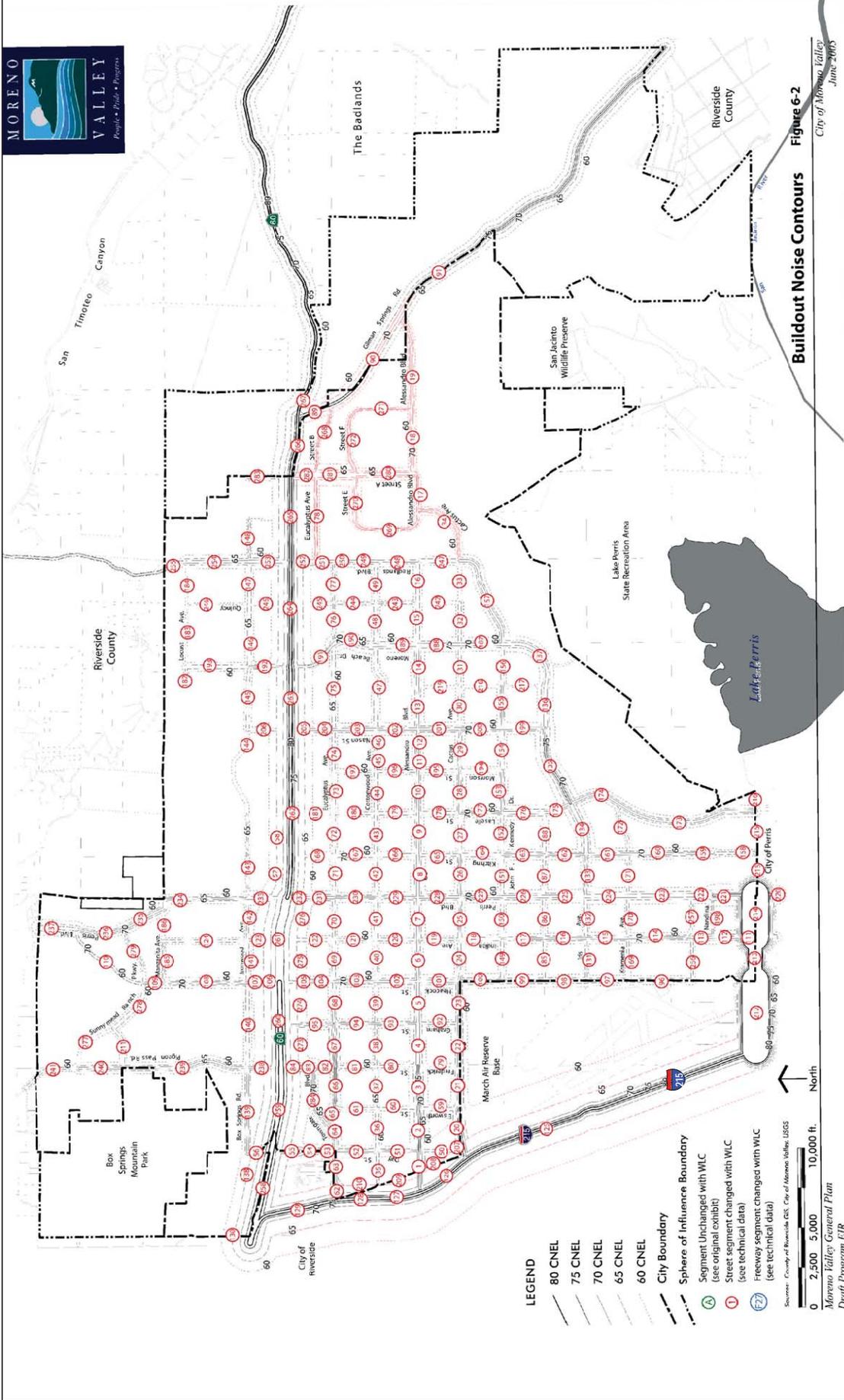


FIGURE 3.20F
World Logistics Center Specific Plan Project
Environmental Impact Report
General Plan Amendment

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Technical Data for Noise Contour Map

Note: Blanks represent segments where noise does not reach that dB level

			Distance from Centerline		
			60dB	65dB	70dB
1 Alessandro Blvd	I-215	Day St	681	361	184
2	Day St	Elsworth	304	141	65
3	Elsworth	Frederick	297	137	64
4	Frederick	Graham	290	134	62
5	Graham	Heacock	306	142	66
6	Heacock	Indian	288	134	62
7	Indian	Perris	292	135	63
8	Perris	Kitching	269	125	58
9	Kitching	Lasselle	258	120	55
10	Lasselle	Morrison	89	41	19
11	Morrison	Civic Center	92	42	19
12	Civic Center	Nason	92	42	19
13	Nason	Oliver	156	72	33
14	Oliver	Moreno Beach	145	67	31
15	Moreno Beach	Quincy	307	149	
16	Quincy	Redlands	91	42	19
17	Cactus	Theodore	191	88	41
18	Theodore	Street F	257	119	55
19	Street F	Gilman Springs	260	120	56
20 Cactus Avenue	I-215	Elsworth	757.5	404.5	207.5
21	Elsworth	Frederick	276	128	59
22	Frederick	Graham	309	143	66
23	Graham	Heacock	266	123	57
24	Heacock	Indian	207	96	44
25	Indian	Perris	185	86	39
26	Perris	Kitching	190	88	41
27	Kitching	Lasselle	165	76	35
28	Lasselle	Morrison	168	78	36
29	Morrison	Nason	200	92	43
30	Nason	Oliver	150	69	32
31	Oliver	Moreno Beach	67	31	14
32	Moreno Beach	Quincy	129	60	27
33	Quincy	Redlands	129	60	27
34	Redlands	Street E	253	117	54
35 Cottonwood Avenue	Frontage Rd	Day St	218	101	
36	Day St	Elsworth	280	135	
37	Elsworth	Frederick	180	87	
38	Frederick	Graham	195	94	
39	Graham	Heacock	210	100	
40	Heacock	Indian	225	108	
41	Indian	Perris	303	145	
42	Perris	Kitching	233	108	

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43	Kitching	Lasselle	253	118	
44	Lasselle	Morrison	273	128	
45	Morrison	Civic Center	203	93	
46	Civic Center	Nason	218	101	
47	Nason	Moreno Beach	296	138	
48	Moreno Beach	Quincy	296	138	
49	Quincy	Redlands	273	128	
50 Day Street	Frontage Rd	Alessandro	108	50	
51	Alessandro	Cottonwood	110	51	23
52	Cottonwood	Eucalyptus	369	184	91
53	Eucalyptus	Gateway	469	241	124
54	Gateway	Campus	501	256	131
55	Campus	SR-60	601	319	161
56	SR-60	Ironwood	420	210	100
57 Elder Avenue	Perris	Kitching	125		
58	E/O	Kitching	75		
59 Elsworth Street	Cactus	Alessandro	163	75	35
60	Alessandro	Cottonwood	77	36	16
61	Cottonwood	Eucalyptus	225	108	
62 Eucalyptus Avenue	I-215	Frontage	721	381	196
63	Frontage	Day St	409	211	110
64	Day St	Towngate	409	211	110
65	Towngate	Elsworth	302	144	
66	Elsworth	Frederick	325	155	74
67	Frederick	Graham	338	161	74
68	Graham	Heacock	358	173	80
69	Heacock	Indian	273	128	
70	Indian	Perris	100	46	
71	Perris	Kitching	94	44	
72	Kitching	Lasselle	259	124	
73	Lasselle	Morrison	279	134	
74	Morrison	Nason	259	124	
75	Nason	Moreno Beach	279	134	
76	Moreno Beach	Quincy	162	75	
77	Quincy	Redlands	194	93	
78	Redlands	Theodore	225	104	
79 Frederick Street	Cactus	Alessandro	120	56	26
80	Alessandro	Cottonwood	192	89	41
81	Cottonwood	Eucalyptus	259	124	
82	Eucalyptus	Towngate	392	194	93
83	Towngate	Sunnymead	601	319	161
84	Sunnymead	SR-60	601	319	161
85 Gentian Avenue	Heacock	Indian	173	80	
86	Indian	Perris	233	108	
87	Perris	Kitching	233	108	
88	Kitching	Lasselle	273	128	
89 Gilman Springs Road	SR-60	Street B	518	240	111

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90	Street B	Alessandro	468	217	100
91	Alessandro	S/O	432	200	93
92	Graham Street	Cactus	186	86	40
93		Alessandro	137	63	29
94		Cottonwood	325	355	75
95		Eucalyptus	345	168	81
96	Heacock Street	San Michele	302	144	
97		Krameria	344	167	80
98		Iris	419	219	99
99		Gentian	419	219	99
100		John F. Kennedy	75	34	16
101		Cactus	55	25	11
102		Alessandro	188	87	40
103		Cottonwood	364	179	86
104		Eucalyptus	364	179	86
105		Sunnymead	484	239	114
106		SR-60	238	110	51
107		Hemlock	209	97	45
108		Ironwood	201	93	43
109		Manzanita	129	104	78
110		Sunnymead Ranch	119	98	24
111	Indian Street	S/O	318	148	68
112		Oleander	446	218	101
113		Nandina	453	225	108
114		San Michele	338	161	74
115		Krameria	386	188	87
116		Iris	365	180	87
117		Gentian	325	155	75
118		John F. Kennedy	58	26	12
119		Cactus	63	29	13
120		Alessandro	165	76	35
121		Cottonwood	218	200	
122		Eucalyptus	273	128	
123		Sunnymead	218	201	
124		Ironwood	218	201	
125	Interstate 215	Oleander	1268	778	413
126		Van Buren	2182	1013	470
127		Cactus	2241	1040	482
128		Alessandro	2152	999	463
129		Eucalyptus	2156	1000	464
130		Box Springs	1780	1155	695
131	Iris Avenue	Heacock	179	86	
132		Indian	181	84	39
133		Perris	91	42	19
134		Kitching	131	61	28
135		Lasselle	145	67	31
136		Nason	277	128	59

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137	Oliver	Moreno Beach	68	31	14	
138	Ironwood Avenue	W/O	Day St	345	168	81
139		Day St	Pigeon Pass	365	180	87
140		Pigeon Pass	Heacock	165	76	35
141		Heacock	Indian	154	71	33
142		Indian	Perris	210	100	
143		E/O	Perris	155	75	
144		W/O	Nason	138	18	
145		Nason	Moreno Beach	102	47	22
146		Moreno Beach	Quincy	41	19	8
147		Quincy	Redlands	41	19	8
148		Redlands	Sinclair	84	39	18
149	John F. Kennedy Drive	Heacock	Indian	279	134	
150		Indian	Perris	116	54	25
151		Perris	Kitching	122	56	26
152		Kitching	Lasselle	235	100	
153		Lasselle	Morrison	364	179	86
154		Morrison	Nason	302	144	
155		Nason	Oliver	344	167	80
156		Oliver	Moreno Beach	18	8	3
157		Moreno Beach	Redlands	204	95	44
158	Kitching Street	N/O	Oleander	224	107	
159		N/O	Nandina	344	167	80
160		S/O	Krameria	124	57	26
161		Krameria	Iris	97	45	20
162		Iris	Gentian	103	47	22
163		Gentian	John F. Kennedy	358	173	80
164		John F. Kennedy	Cactus	30	14	6
165		Cactus	Alessandro	46	21	10
166		Alessandro	Cottonwood	140	65	30
167		Cottonwood	Eucalyptus	296	138	
168		Eucalyptus	Sunnymead	253	118	
169	Krameria Avenue	Heacock	Indian	182	84	39
170		Indian	Perris	182	84	39
171		Perris	Kitching	43	20	9
172		Kitching	Lasselle	69	32	15
173	Lasselle Street	S/O	Krameria	75	34	16
174		Krameria	Iris	98	45	21
175		Iris	Gentian	190	88	41
176		Gentian	John F. Kennedy	392	239	114
177		John F. Kennedy	Cactus	199	92	43
178		Cactus	Alessandro	135	62	29
179		Alessandro	Cottonwood	102	47	22
180		Cottonwood	Eucalyptus	279	107	
181		N/O	Eucalyptus	218	18	
182	Locust Avenue	W/O	Moreno Beach	194	93	
183		Moreno Beach	Quincy	78	36	16

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184	Quincy	Redlands	78	36	16
185 Manzanita Avenue	Heacock	Indian	198	81	
186	Indian	Perris	115		
187 Moreno Beach Drive	John F. Kennedy	Cactus	65	30	14
188	Cactus	Alessandro	206	95	44
189	Alessandro	Cottonwood	208	96	44
190	Cottonwood	Eucalyptus	208	96	44
191	Eucalyptus	SR-60	208	96	44
192	SR-60	Ironwood	242	112	52
193	Ironwood	Locust	108	50	23
194 Morrison Street	John F. Kennedy	Cactus	273	128	
195	Cactus	Alessandro	273	128	
196	Alessandro	Cottonwood	98	45	21
197	Cottonwood	Eucalyptus	210	100	
198 Nandina Avenue	Indian	Perris	155	75	
199 Nason Street	Iris	John F. Kennedy	175	81	37
200	John F. Kennedy	Cactus	175	81	37
201	Cactus	Alessandro	257	119	55
202	Alessandro	Cottonwood	228	105	49
203	Cottonwood	Eucalyptus	419	209	99
204	Eucalyptus	SR-60 Ramps	424	214	104
205	SR-60 Ramps	SR-60	329	159	79
206	SR-60	Ironwood	203	93	
207 Old 215 Frontage Rd	Cactus	Day St	239.5	114.5	
208	Day St	Alessandro	80.5		
209	Alessandro	Cottonwood	179.5	86.5	
210	Cottonwood	Eucalyptus	239.5	114.5	
211 Old Lake Drive	Pigeon Pass	Sunnymead Ranch	240	115	
212 Oleander Avenue	I-215	Heacock	872	962	1062
213	Heacock	Indian	452	512	572
214	Indian	Perris	872	962	1062
215	Perris	Lasselle	76	35	16
216	Lasselle	Lake Perris	38	17	8
217 Oliver Street	Iris	John F. Kennedy	72	33	15
218	John F. Kennedy	Cactus	81	38	17
219	Cactus	Alessandro	20	9	4
220 Perris Boulevard	S/O	Oleander	626.5	326.5	156.5
221	Oleander	Nandina	139	63	29
222	Nandina	San Michele	139	63	29
223	San Michele	Krameria	139	63	29
224	Krameria	Iris	145	67	31
225	Iris	Gentian	278	129	60
226	Gentian	John F. Kennedy	278	129	60
227	John F. Kennedy	Cactus	109	50	23
228	Cactus	Alessandro	111	51	24
229	Alessandro	Cottonwood	366.5	181.5	88.5
230	Cottonwood	Eucalyptus	326.5	156.5	76.5

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231	Eucalyptus	Sunnymead	275	127	59
232	Sunnymead	Elder	516.5	261.5	126.5
233	Elder	Ironwood	486.5	241.5	116.5
234	Ironwood	Manzanita	326.5	156.5	76.5
235	Manzanita	Sunnymead Ranch	421.5	211.5	101.5
236	Sunnymead Ranch	Heacock	376.5	169.5	82.5
237	N/O	Heacock	519	264	129
238 Pigeon Pass Road	SR-60	Ironwood	396.5	181.5	88.5
239	Ironwood	Old Lake	392.5	194.5	93.5
240	Old Lake	Sunnymead Ranch	168	81	
241	N/O	Sunnymead Ranch	203	93	
242 Quincy Street	Cactus	Alessandro	122		
243	Alessandro	Cottonwood	167	74	
244	Cottonwood	Eucalyptus	167	74	
245	Eucalyptus	Ironwood	138		
246	Ironwood	Locust	68		
247 Redlands Boulevard	Cactus	Alessandro	61	28	13
248	Alessandro	Cottonwood	72	33	15
249	Cottonwood	Dracaea	72	33	15
250	Dracaea	Eucalyptus	113	52	24
251	Eucalyptus	Fir	265	123	57
252	Fir	SR-60	265	123	57
253	SR-60	Ironwood	325	151	70
254	Ironwood	Locust	372	172	80
255	N/O	Locust	372	172	80
256 San Michele Road	Heacock	Indian	209	99	
257	Indian	Perris	179	86	
258 SR-60	I-215	Day St	1963	911	422
259	Day St	Pigeon Pass	1998	927	430
260	Pigeon Pass	Heacock	1835	851	395
261	Heacock	Perris	1734	805	373
262	Perris	Nason	1617	750	348
263	Nason	Moreno Beach	1565	726	337
264	Moreno Beach	Redlands	1363	633	293
265	Redlands	Theodore	1344	624	289
266	Theodore	Gilman Springs	1409	654	303
267	E/O	Gilman Springs	1253	581	270
268 Street B	Theodore	Gilman Springs	135	62	29
269 Street E	Alessandro	Street E	119	55	25
270	Street E	Theodore	360	167	77
271 Street F	Alessandro	Street F	113	52	24
272	Street F	Theodore	202	93	43
273 Sunnymead Boulevard	Frederick	Graham	302	144	
274	Graham	Heacock	259	124	
275	Heacock	Indian	194	93	
276	Indian	Perris	179	86	
277 Sunnymead Ranch Parkway	Pigeon Pass	Old Lake	124		

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278	Old Lake	Heacock	302	144	
279	Heacock	Perris	167	80	
280 Theodore Street	Street C	Street F	361	167	77
281	Street F	Eucalyptus	712	330	153
282	Eucalyptus	SR-60	670	311	144
283	SR-60	Ironwood	145	67	31
284 Towngate Boulevard	Eucalyptus	Frederick	341	171	91

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**FIGURE 4-2
FUTURE PARKLANDS
ACQUISITION AREAS**

- Streets
- Major Streets
- Highways
- Future Parkland Acquisition Areas
- Existing Active Parks
- Proposed Active Parks
- San Jacinto Wildlife Area
- State and County Parks
- Badlands Landfill
- Moreno Valley
- Moreno Valley Sphere
- March ARB
- Waterbodies



Date: July 11, 2008
 Drawing Title: Moreno Valley Sphere
 File: C:\moreno\plan\open_plan_updates\future_parklands.mxd

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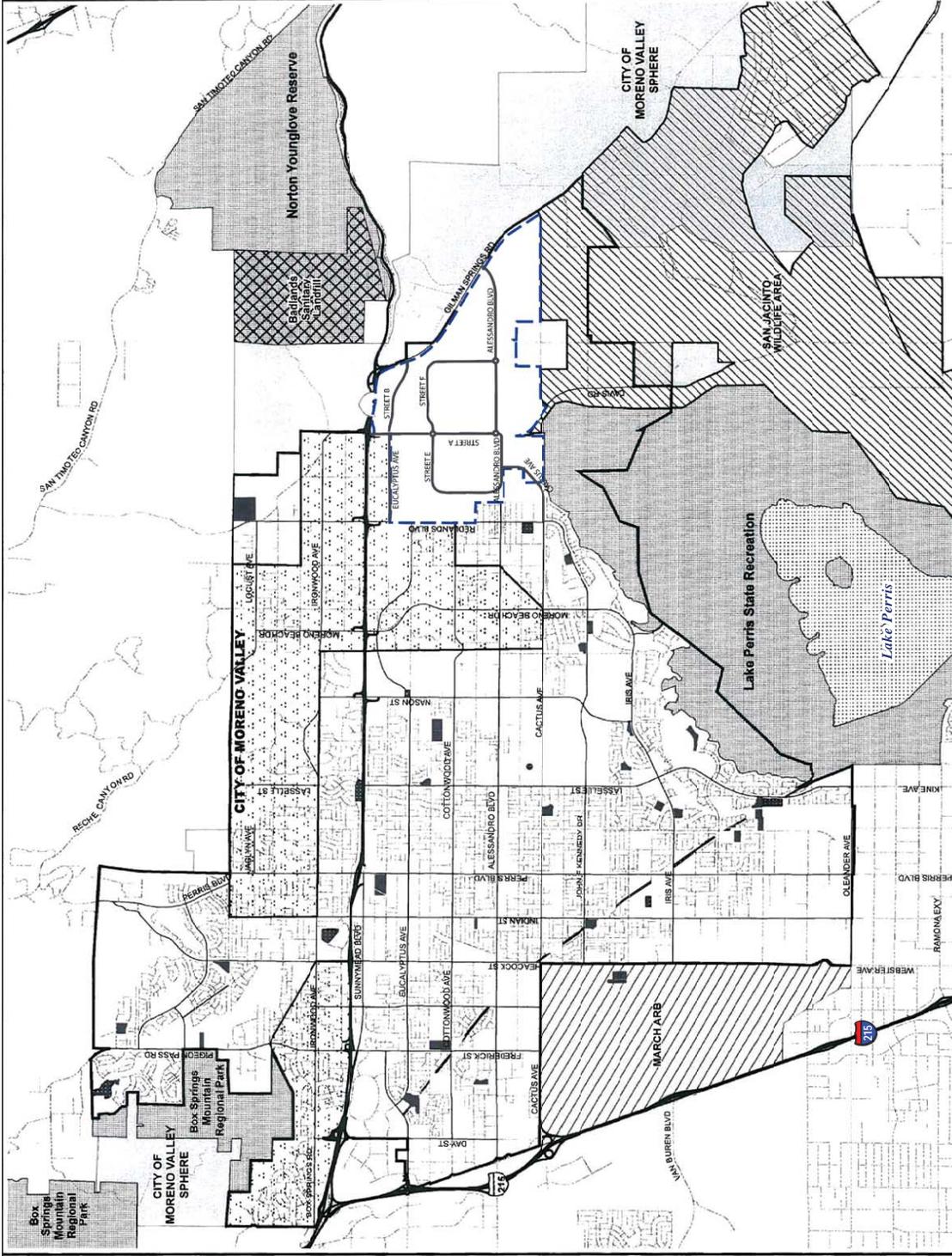


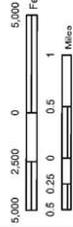
FIGURE 3.20n

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MORENO VALLEY

**FIGURE 7-2
MAJOR SCENIC
RESOURCES**

- Streets
- Major Streets
- Highways
- Scenic Route
- Moreno Valley
- Moreno Valley Sphere
- March ARB
- Waterbodies
- View Corridor



Date: July 11, 2006
 Site: I-215 MAPS Zone 6
 File: G:\arcmap\planning\gen_plan_updates\mfv_scenic.mxd

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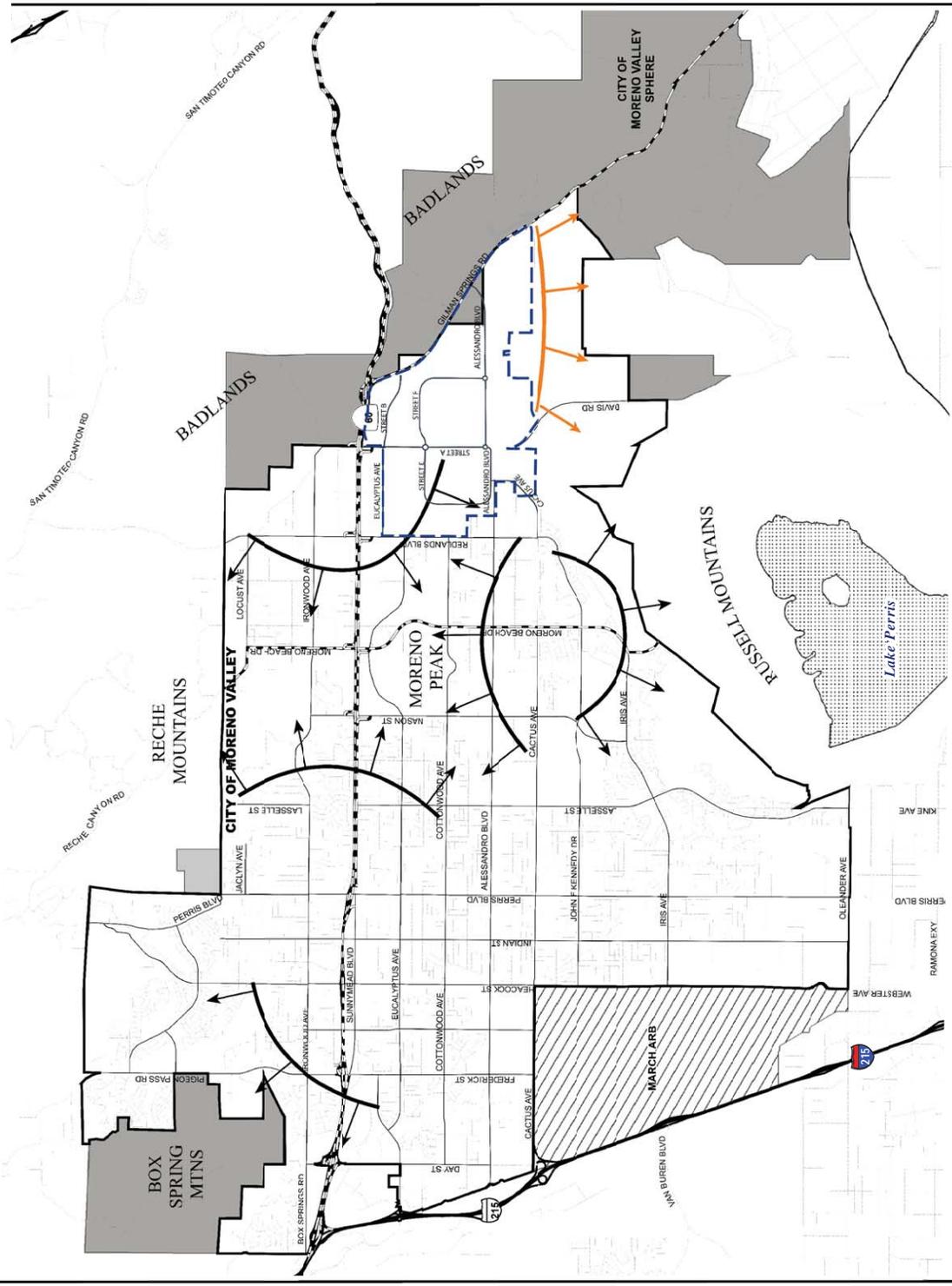


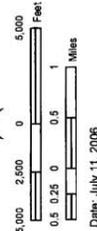
FIGURE 3. 201

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MORENO VALLEY

FIGURE 4-3 MASTER PLAN OF TRAILS

- ⊗ Trail Staging - Existing
 - ⊗ Trail Staging - Proposed
 - Streets
 - Highways
 - - - Improved Trail
 - ⋯ Multisect Trail
 - ⋯ Proposed Trail
 - ⋯ Regional Trail
 - ⋯ State Trail
 - ⋯ Proposed Subject to Feasibility of Freeway Bridge or Underpass
 - ▨ Badlands Landfill
 - ▨ State and County Parks
 - ▨ Moreno Valley
 - ▨ Moreno Valley Sphere
 - ▨ San Jacinto Wildlife Area
 - ▨ Waterbodies
- *Trail locations are approximate



Date: July 11, 2006
 State Plane NAD83 Zone 6
 File: G:\work\planning\gen_plan_updates\master_trails.mxd

GEOGRAPHIC INFORMATION SYSTEMS
 The information shown on this map was compiled from the Riverside County GIS and the City of Moreno Valley GIS. The land base and facility information on this map was derived from GIS data. The City of Moreno Valley and Riverside County and City of Moreno Valley will not be responsible for any errors or omissions or for damages resulting from the use of this map.

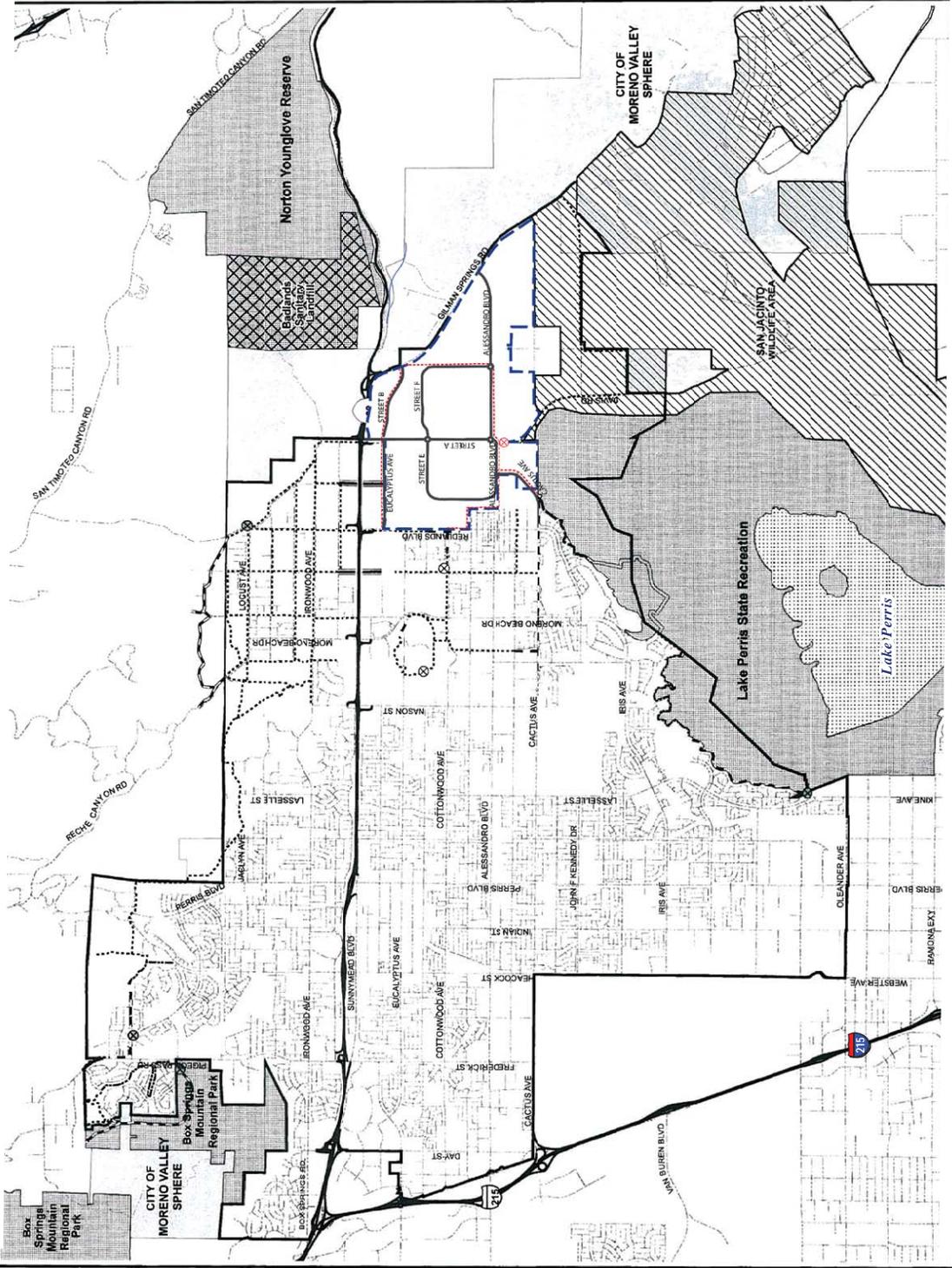


FIGURE 3.20

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4. Safety Element (revise the following to incorporate WLCSP)

- a. Revise Fire Stations map (Figure 6-1) (page 6-8) consistent with WLCSP.
- b. Revise Build-Out Noise Contours map (Figure 6-2) to match WLCSP contours.

5. Conservation Element

- a. Revise Major Scenic Resources map (Figure 7-2)(page 7-13) to incorporate WLCSP.

6. Goals and Objectives

- a. Revise Circulation Plan (Figure 9-1) (page 9-26) to incorporate WLCSP circulation plan.
- b. Revise LOS Standards map (Figure 9-2) (page 9-28) consistent with WLCSP.
- c. Revise Bikeway Plan map (Figure 9-4) (page 9-29) consistent with WLCSP bikeway plan.

3.6 PROJECT OBJECTIVES

The purpose of the proposed project is to provide a new master-planned facility specializing in logistics warehouse distribution services. Section 1.3.1, *Development Goals*, of the WLC Specific Plan outlines the following overall objectives for the proposed WLC Specific Plan:

NOTE: *The indicated minor wording change was made so the objectives would more accurately regarding service to the port which will only represent a small fraction of project trips (see Section 4.15, Transportation).*

- Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.
- Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan.
- Create a major logistics center with good regional and freeway access.
- Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.
- Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings.
- Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach.
- Create a project that will provide a balanced approach to the City's responsibilities of fiscal viability, economic expansion, and environmental integrity.
- Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.
- Encourage new development consistent with regional and municipal service capabilities.
- Significantly improve the City's jobs/housing balance and help reduce unemployment within the City.
- Provide thousands of construction job opportunities during the project's build-out phase.
- Provide appropriate transitions or setbacks between on-site and off-site uses.

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3.6.1 City’s Economic Development Action Plan Objectives

In 2011, the City adopted an Economic Development Action Plan (EDAP) that outlined the following general objectives:

Objectives for Economic Development

- Create jobs locally and address City’s high unemployment rate
- Address the Community’s jobs to housing imbalance
- Strengthen and broaden the local economic foundation by attracting quality businesses
- Enhance City revenue generation from sources such as sales tax, property tax, transient occupancy tax, and utility tax – all aimed at improving quality of life in Moreno Valley

Eastern Moreno Valley–Rancho Belago

- Prime area of Community with large undeveloped areas.
- Skechers USA opening has generated interest by other prospective corporate users.
- Nearly 20-year old Moreno Highlands Specific Plan to expire in 2012
- Highest and Best land uses should be evaluated to address City’s jobs to housing imbalance

Survey of Inland Region Industrial/Business Park Zoning

- Ontario 25.3%
- Perris 21.7%
- San Bernardino 18.0%
- Chino 17.1%
- Fontana 17.0%
- Rancho Cucamonga 15.3%
- Riverside 15.2%
- Corona 11.4%
- Moreno Valley 9.0%

In 2013, the EDAP was replaced and included the following specific objectives related to the World Logistics Center:

World Logistics Center at Rancho Belago

- Collaborate with Highland Fairview in the development of the World Logistics Center—a 41.6 million S.F. master planned corporate park proposed to be developed on 2,700 acres in the Rancho Belago area of eastern Moreno Valley.
- Process an Environmental Impact Report and preliminary development plans for the World Logistics Center in eastern Moreno Valley—south of SR 60 and east of Redlands Boulevard to Gilman Springs Road.
- Assist in the drafting of a Specific Plan that will guide the orderly development for of World Logistics Center.
- Cooperate with Highland Fairview in the formulation of a Development Agreement to create a public-private partnership to help facilitate the development of new public infrastructure in eastern

Moreno Valley associated with the World Logistics Center including roads, trails, utilities, storm water protection and fire protection facilities.

- Work with Highland Fairview in branding the World Logistics Center as one of the largest e-commerce focused development projects in the U.S.

3.7 REQUIRED DISCRETIONARY ACTIONS AND PERMITS

3.7.1 City of Moreno Valley – Current Approvals

This Program EIR is intended to inform the City of Moreno Valley decision-makers and the general public of the environmental consequences of the proposed project. Entitlements being analyzed in this EIR include a General Plan Amendment, adoption of a Specific Plan, a Zone Change, a Development Agreement, a Tentative Parcel Map, and annexation of an 85-acre parcel along Gilman Springs Road. The City of Moreno Valley is the Lead Agency for the proposed project, but discretionary actions may also be required by other agencies (see Section 3.6.3).

The following discretionary actions are anticipated to be taken by the City of Moreno Valley as part of the proposed project:

3.7.1.1 Environmental Impact Report

Before taking action on the project, the City must certify that the EIR prepared for the project is adequate and represents the independent judgment of the City as the Lead Agency under CEQA.

3.7.1.2 General Plan Amendment

The General Plan Amendment proposes a revision to the City General Plan land use designations for 3,714 acres to Business Park/Light Industrial (BP). The General Plan Amendment also includes amendments to several other elements, including the Community Development Element, the Parks, Recreation and Open Space Element, the Circulation Element, the Environmental Safety Element, and the Conservation Element to make them consistent with the proposed project (see previous Section 3.5, *General Plan Amendment*).

3.7.1.3 WLC Specific Plan

The proposed project includes a Specific Plan to implement the amended General Plan and to set forth comprehensive land use regulations governing the development of the proposed project. The World Logistics Center Specific Plan is a master plan for a 2,610-acre site for the development of up to 40.6 million square feet of modern high-cube logistics and related warehouse distribution facilities defined as Logistics Development and Light Logistics. The Specific Plan establishes the master plan of development for the project area, including development standards and use regulations, a master plan for circulation, infrastructure, architectural, landscape and design guidelines and sustainability goals, all of which will be applicable to all development within the area covered by the Specific Plan.

3.7.1.4 Change of Zone

The Change of Zone will establish the World Logistics Center Specific Plan, which will replace most of the Moreno Highlands Specific Plan and rezone several other contiguous properties. The new Specific Plan will become the regulatory land use document for the entire 2,610-acre Specific Plan area. The 910-acre CDFW property and the 174-acre SDG&E property will not be included in the

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Specific Plan but will be rezoned to Open Space to reflect the long-range plans for the properties. The 20 acres of land owned by SDG&E and SCGC that are used for natural gas facilities will be zoned for Public Utility use. The WLC property would then have two land use zones, Logistics Development (LD) and Light Logistics (LL).

3.7.1.5 Development Agreement

The project includes a Development Agreement between the project applicant, Highland Fairview, and the City of Moreno Valley in order to provide certainty for the future development of the project for those parcels owned by Highland Fairview (see Final EIR Appendix H for updated text).

3.7.1.6 Tentative Parcel Map

A Tentative Parcel Map (for financing purposes only) proposes the subdivision of a portion of the project site into large parcels. This map is for financing purposes only and does not create any development rights for the subdivided properties. Subsequent subdivision applications will be required prior to the development of any buildings on the site.

3.7.1.7 Annexation

The project includes the completion of the annexation process for an 85-acre parcel located on the north side of Alessandro Boulevard at Gilman Springs Road. The County has already taken the first step to make this parcel part of the City by including it in the City's Sphere of Influence in 1985. The proposed project includes pre-annexation General Plan land use designations and zoning for this parcel. This EIR will be the environmental documentation used by the Local Agency Formation Commission to complete the annexation process. This project proposes to incorporate this property into the World Logistics Center Specific Plan.

3.7.2 City of Moreno Valley – Future Approvals

While building sizes, configurations and designs will vary, it is anticipated that between 15 and 30 logistics buildings will be developed within the WLC project. Each building may enclose from one to two million square feet and have multiple tenants. Each building will be subject to a discretionary Plot Plan process described in Section 11 of this Specific Plan."

Upon submittal of any site-specific development proposal within or related to the Specific Plan project, the City must determine whether the environmental effects of the proposal are within the levels of environmental effects analyzed in this programmatic EIR. In order to make this determination, the City may require the completion of an initial study (*CEQA Guidelines*, Appendix G Checklist). For each development proposal, the City will make one of the following determinations, as set forth under CEQA:

3.7.2.1 Categorical Exemptions (CE)

The City would adopt a categorical exemption under the following circumstances.

- 1) An assessment of the proposed action relative to the certified Program EIR determined there was no possibility of a significant environmental impact and the proposed action (utility improvements within rights-of-way, etc.) had already been evaluated in the EIR.

3.7.2.2 Negative Declaration (ND)

The City would adopt a negative declaration under the following circumstances.

- 2) If the initial study leads to the conclusion that the proposed project would have no significant environmental effects; or
- 3) If the initial study leads to the conclusion that the project may have potentially significant environmental effects, but all such effects are within levels that were fully reviewed, disclosed, and/or mitigated within this programmatic EIR.

Upon making a negative declaration, no further environmental analysis would be required.

3.7.2.3 Mitigated Negative Declaration (MND)

The City would adopt a mitigated negative declaration if the initial study leads to all of the following conclusions:

- 1) The proposed project could have a significant environmental effect; and
- 2) This potentially significant environmental effect may exceed levels that were fully reviewed, disclosed and/or mitigated within this programmatic EIR; and
- 3) The City, through a review of any associated studies that may accompany the completion of the initial study, concludes that these potentially significant effects can be fully mitigated with mitigation measures in addition to those identified in this programmatic EIR.

Upon making a mitigated negative declaration, no further environmental analysis would be required.

3.7.2.4 Supplemental EIR

A Supplemental EIR would be needed if the City concluded that the proposed project could have significant environmental effects exceeding the levels that were fully reviewed, disclosed, and/or mitigated within this program EIR and that further study is needed to determine if any feasible mitigation measures may be reasonable or prudent to address these environmental effects. Any Supplemental EIR(s) would only cover the environmental topic areas in which potentially significant impacts were identified in the initial study.

The initial study process outlined above will also help the City in determining if any proposed project within the project area qualifies for a partial or full exemption from any further environmental analysis. Specifically, some proposed projects may qualify for a statutory or categorical exemption, as outlined in Articles 18 and 19 of the *CEQA Guidelines*. Other provisions of California law limit the extent of further environmental review required in the case where a city has adopted a specific plan and certified an associated EIR, as would be the case for this project. Notwithstanding, the law also provides that in the event of changed circumstances in the project area or the identification of impacts not previously considered or analyzed, subsequent environmental review (such as a mitigated negative declaration or supplemental EIR) may be required.

3.7.2.5 Subsequent EIR

CEQA Section 15162 requires a Subsequent EIR "If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration or EIR, the Lead Agency shall prepare a subsequent EIR if required under subsection (a). Otherwise, the Lead Agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further

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documentation.” Any changes to the Specific Plan will be subject to the criteria listed below. As required by Section 15162(a), a proposed change in a project will require preparation of a subsequent EIR if:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or a negative declaration due to an involvement of new significant environmental effects, or a substantial increase in the severity of previously identified significant effects; or
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects, or a substantial increase in the severity of the previously identified significant effects; or
3. New information of substantial importance, which was not known and could have not been known with the exercise of reasonable diligence at the time the previous EIR was certified, shows:
 - a. The project will have one or more significant effects not discussed in the previous EIR;
 - b. The significant effects previously examined will be substantially more severe than identified in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives; or
 - d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

If none of the above conditions is met, the preparation of a subsequent EIR is not required.

3.7.2.6 Addendum to WLC EIR

An Addendum to a previously approved EIR may be required if there are minor changes or additions to the previously analyzed project. An Addendum is used:

- To evaluate whether or not there are any new or more severe significant environmental effects associated with the proposed project;
- To review whether there is new information or circumstances that would require preparation of additional environmental documentation in the form of a subsequent or supplemental EIR, or if an Addendum is appropriate; and
- To evaluate the proposed project’s potential environmental impacts in the context of the questions posed in CEQA Section 15162(a).

3.7.3 Actions by Others

Although the City of Moreno Valley is the Lead Agency for the proposed project, a number of other Federal, State, or special purpose agencies may consult this EIR for their own decision-making and actions now or in the future. The following is a list of anticipated discretionary or non-discretionary actions by other agencies; however, it is not exhaustive and may include other agencies and processes in the future as appropriate:

- **County of Riverside**
 - Local Agency Formation Commission (LAFCO): Annexation of 85-acre parcel.

- Flood Control and Water Conservation District: Amend Storm Drain Master Plan.
- ***Other Affected Agencies***
 - Western Riverside Council of Governments: TUMF Contributions.
 - Eastern Municipal Water District: Water Service Agreements.
 - Developer will make “fair share” contributions to established development impact fee programs in the cities of Riverside, Perris, and Redlands for local road and intersection improvements identified in the programmatic Traffic Impact Assessment (TIA) included with the EIR (Final EIR Volume 2 Appendix L-1). This item is subject to review and approval by the City Transportation Division.
- ***State of California***
 - Regional Water Quality Control Board: Water Quality Permitting.
 - Department of Transportation (Caltrans): Encroachment Permits for SR-60 and adopt fair share contribution programs for future development within the WLCSP to contribute funds for local road and intersection improvements identified in the programmatic Traffic Impact Assessment (TIA) included with the EIR (Final EIR Volume 2 Appendix L-1).
 - California Department of Fish and Wildlife: Streambed Alteration Agreements.
- ***Federal Agencies***
 - U.S. Army Corps of Engineers: Clean Water Act Permitting.

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NOTE TO READERS: *This section contains no major revisions based on changes to the WLC Project, revised technical studies, or in response to comments on the Programmatic Draft EIR.*

4.0 ENVIRONMENTAL IMPACT EVALUATION

As stated previously, there are 16 environmental issue areas that are analyzed in this EIR with respect to the proposed project. These issues are:

- | | |
|--|--|
| 4.1 Aesthetics | 4.9 Hydrology and Water Quality |
| 4.2 Agriculture and Forestry Resources | 4.10 Land Use and Planning |
| 4.3 Air Quality | 4.11 Mineral Resources |
| 4.4 Biological Resources | 4.12 Noise |
| 4.5 Cultural Resources | 4.13 Population, Housing, and Employment |
| 4.6 Geology and Soils | 4.14 Public Services |
| 4.7 Greenhouse Gas Emissions, Energy Conservation, and Global Climate Change | 4.15 Transportation and Traffic |
| 4.8 Hazards and Hazardous Materials | 4.16 Utilities and Service Systems |

Within each subsection described in Section 4.0, the following information is presented relative to each environmental issue described:

- Description of the existing setting as it relates to the specific environmental issue;
- A summary of policies and regulations relevant to the specific environmental issue;
- Identification of the thresholds of significance;
- Evaluation of project-specific impacts and a determination of significance based on identified threshold levels;
- Description of design features of the Specific Plan that will help reduce potential impacts;
- Identification of mitigation measures;
- A determination of the level of significance after mitigation measures are implemented; and
- Cumulative impacts.

The environmental analysis provided in Sections 4.1 through 4.16 focuses on changes in the existing physical environment and identifies direct and indirect significant impacts associated with the proposed project. The cumulative impacts for each of the proposed project components are analyzed within the discussion of each component for each threshold.

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NOTE TO READERS. *This section has been revised based on changes to the WLC Specific Plan and in response to comments on the Programmatic DEIR regarding views.*

4.1 AESTHETICS

This section describes the existing aesthetic condition of the project area and analyzes potential impacts of the proposed WLC project relative to views, and light and glare based on the development characteristics outlined in the WLC Specific Plan (September 2014). Although there are no specific building locations or designs proposed at this time, the Specific Plan contains sufficient detail as to the general appearance and locations of buildings to evaluate the potential aesthetic impacts of development.

As a program-level CEQA document, this analysis will be based on the characteristics of buildings that can be built under the WLCSP. This analysis will look at the height, glare and lighting, visual impact, and viewshed impacts of the type of buildings authorized by the design standards and criteria set forth in Section 5.0 of the WLCSP. This section of the WLCSP creates comprehensive design and aesthetic guidelines. Section 4.2.4 of the Specific Plan presents various line-of-sight cross-sections and photographic renderings showing views of various locations around the project site, which are illustrative of the massing and types of buildings authorized by the WLCSP.

Note: The following changes have been made due to revisions to the Specific Plan project area.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The environmental impacts of all of these entitlements on the entire project area are addressed in this EIR and the accompanying technical reports and analyses.

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Information on visual characteristics, both on the site and in the vicinity of the project site, is presented in this section. Potential impacts to aesthetic visual resources and viewshed impacts resulting from the development of the proposed WLC project are based on analyses of site photographs, site reconnaissance, project data from the WLC Specific Plan, line-of-sight cross sections, and photographic renderings. The determinations in this section of the EIR are based, in part, on the City of Moreno Valley General Plan polices related to views and open space.

For the purposes of the following analyses, two general aesthetic terms are defined: scenic vistas and viewsheds.

- **Scenic Vistas.** A scenic vista can be categorized as either containing a panoramic view¹ or a focal view. Panoramic views are typically associated with publicly-accessible vantage points that provide a sweeping geographic orientation not commonly available (e.g., skylines, valleys, mountain ranges, or large bodies of water). Focal views are typically associated with views of natural landforms, public art/signs, and visually important structures, such as historic buildings. Aesthetic components of a scenic vista include three components: scenic quality, sensitivity level, and view access.
- **Viewsheds.** A viewshed is typically defined as the natural environment that is visible from one or more viewing points. CEQA documents most often define viewshed as what portions of the project viewers can see from surrounding areas. A viewshed can be divided into three distinct components: the foreground, midground, and background.

4.1.1 Existing Setting

NOTE: The following changes have been made due to revisions to the Specific Plan.

The approximately 3,714-acre project site is located in Rancho Belago, the eastern portion of the City, and is situated on a gently sloping valley floor directly south of State Route 60 (SR-60) with the Badlands area to the east and northeast, the Mount Russell Range to the southwest, and Mystic Lake and the San Jacinto Wildlife Area to the southeast.

4.1.1.1 On-Site Conditions

Situated within northeastern Moreno Valley, the project site gently slopes to the south and elevations on-site range from 1,760 feet above mean sea level (amsl) near the northeast corner down to 1,480 feet amsl at the southeast corner. The site is largely vacant and supports mainly dry farm agriculture with little ornamental landscaping, lighting, or signage located within the project limits. At present, there are seven rural residences and associated farm structures in three areas on site: one on the east side of Redlands Boulevard in the west-central portion of the site and the others on either side of Theodore Street in the north-central portion of the site. The project site itself contains no scenic resources, although the large areas of agricultural fields do represent a kind of visual “open space” as vacant land and allow existing residences in the area to have unobstructed panoramic views. The site has significant views and scenic vistas of Mount Russell to the south, the Badlands to the north and east, Mount San Jacinto to the east, and the San Jacinto Wildlife Area to the south.

4.1.1.2 Adjacent Land Uses

Land uses adjacent to the project site include the Skechers logistics building to the northwest, and several suburban residential neighborhoods along Redlands Boulevard south of Cottonwood Avenue,

¹ A panoramic view consists of visual access to a large geographic area, for which the field of view can be wide and extend into the distance.

and the “Old Moreno” commercial area at the intersection of Redlands Boulevard and Alessandro Boulevard. The closest residences are within 40 feet of the project property along Bay Street and Merwin Street. An additional residential neighborhood is located several hundred feet west of Redlands Boulevard, south of Eucalyptus Avenue. North of SR-60, there are several rural residences located between Redlands Boulevard and Theodore Street (refer to previously referenced Figure 3.3, *Existing Land Uses*). Much of the surrounding land is vacant and supports agriculture or open space (e.g., Badlands and Mount Russell). It should be noted that the General Plan makes reference to the “rural northeast portion of the City,” which refers to the land north of SR-60, not south of the freeway (J. Terrell, personal communication, November 2012).

4.1.1.3 Existing Viewsheds and Scenic Vistas

As illustrated in Figure 4.1.1, the proposed project site represents a large undeveloped area situated between the Badlands (northeast and east), the San Jacinto Wildlife Area (south), and the Lake Perris Recreational Area (southwest). Views across the site from SR-60 and from Gilman Springs Road are of vacant agricultural land forming the foreground, midground, and background. In the far background from these two roadways are Mystic Lake and the uplands surrounding Lake Perris. The major scenic resources for the project area, as documented in Figure 7-2 of the General Plan Conservation Element, are the Russell Mountains to the southwest, the Badlands to the east and northeast, Moreno Peak to the west, and the Reche Mountains to the far northwest. The existing agricultural fields provide a pleasant low relief foreground over which to view the three surrounding upland areas described above. The Conservation Element does not include the existing agricultural fields as a major scenic resource, although it does acknowledge that “Expanses of open land are found throughout the eastern portion of the study area. These tracts of land allow for uninterrupted scenic vistas from State Route 60, Gilman Springs Road, and other roadways and provide views of the San Jacinto Valley and the ephemeral Mystic Lake” (General Plan page 7-12).

Section 5.11, *Aesthetics*, in the City’s General Plan EIR, indicates the major scenic resources within the Moreno Valley study area are visible from SR-60, a City-designated local scenic road. As SR-60 travels through the eastern part of Moreno Valley, it approaches and eventually passes through the Badlands area. Characterized by steep and eroded hillsides, the Badlands provide a range of hills that act as a visual backdrop to the valley. Similarly, views afforded while traveling west through Rancho Belago, the eastern part of the City, include views of the Badlands to the north and south, and Mystic Lake and the Mount Russell Range to the far south. These resources are highlighted in General Plan EIR Figure 5.11-1, *Major Scenic Resources*. Table 4.1.A provides a summary of the existing viewsheds to and from the project site. Because of these resources, travelers on SR-60 and Gilman Springs Road are considered scenic routes since these visual resources are readily visible from these roadways.

The Conservation Element of the General Plan also states that, “The City of Moreno Valley has the opportunity to designate scenic routes as the basis for preserving outstanding scenic views. Special attention to the location and design of buildings, landscaping, and other features should be made to protect and enhance views from scenic roadways” (General Plan page 7-14). These statements indicate the City acknowledges the eventual conversion of the extensive agricultural fields and their replacement by buildings, but it emphasizes the importance of locating and designing the buildings to maintain existing scenic views (i.e., the surrounding uplands).

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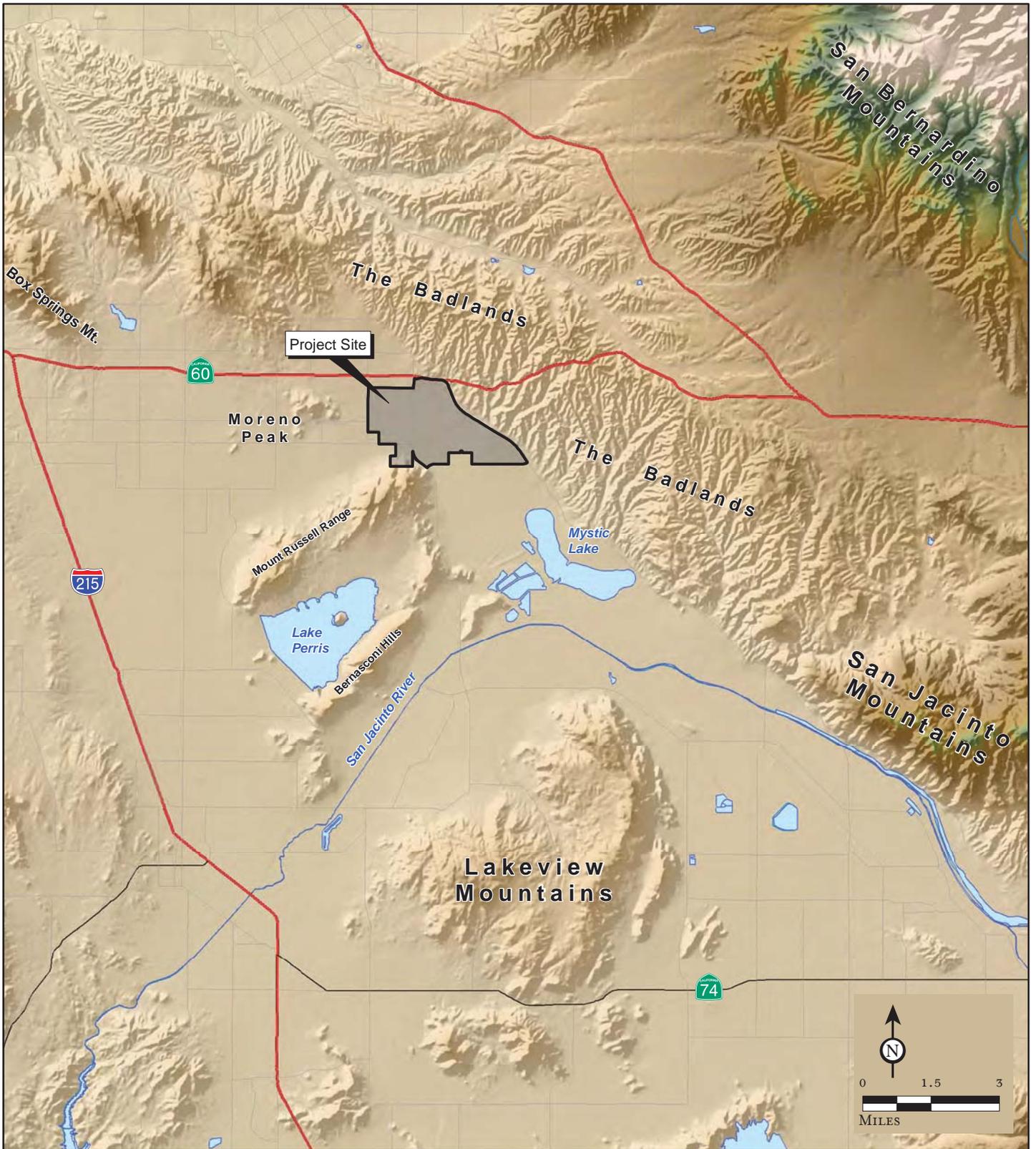
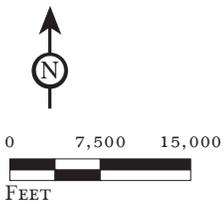


FIGURE 4.1.1

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Natural Landforms

SOURCE: ESRI, USGS DEM.

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Table 4.1.A: Existing Viewsheds

Vantage Point	Characteristics of Views		
	Foreground	Midground	Background
Looking north from the SJWA* land toward the project site	Agricultural fields that are part of SJWA property	Agricultural fields on project site and SDG&E** facility	SR-60 with Badlands rising above
Looking east from existing residential uses along Redlands Boulevard toward the project site	Agricultural fields of the project site and windrow of olive trees along east side of Redlands Boulevard	Agricultural fields of the project site and Gilman Springs Road	Gilman Springs Road with Badlands rising above, and portions of Mount San Gorgonio visible above the Badlands (on a clear day)
Looking south from SR-60 toward the project site	Agricultural fields and related equipment on the project site	Agricultural fields of the project site and the northern SJWA property	Mystic Lake, SJWA, and Mount Russell Range surrounding the Lake Perris State Recreational Area
Looking west from Gilman Springs Road and the Badlands toward the project site	Agricultural fields and related equipment on the project site	Agricultural fields of the project site	Skechers building, scattered rural residential on the project site, and suburban residential at southwest portion of project site

* San Jacinto Wildlife Area.

** San Diego Gas & Electric Natural Gas Compressor Plant.

Source: LSA Associates, Inc. Site Survey, March 2012.

Views from the Project Site. Views to the north from the project site include the new Skechers logistics building and SR-60, while to the northeast, east and southeast, the rugged topography of the Badlands dominates the view. To the south, the view is of the San Jacinto Wildlife Area with partial views of Mystic Lake. To the southwest, views of Mount Russell and the Mount Russell Range predominate, with suburban residential uses visible to the far southwest and west. These views are experienced by travelers on Redlands Boulevard, Theodore Street, and Alessandro Boulevard, and residents of the rural residences on the project site. These represent significant visual resources; SR-60 and Gilman Springs Road are scenic routes because they have unobstructed views of these resources.

Views toward and across the Project Site. Views of the project site from the area north of SR-60 are limited by the SR-60 roadway and existing development. The skyline is dominated by views of the Badlands and of the Mount Russell Range. Views across the site from the northwest are from existing and/or planned non-residential uses. Current views of the site from these areas are of vacant agricultural land and the few scattered residences, and also the Skechers building near the northwest corner of the project site.

Foreground and midground views for the residences along the west and southwest boundaries of the project site are presently of vacant agricultural land, a windrow of olive trees along Redlands Boulevard, scattered palm trees, and scattered rural residences on site. Background views from these areas are of the Badlands, sweeping from the northeast to southeast. The Mount Russell Range dominates the southeasterly view from this area. Mystic Lake and the surrounding SJWA lands are not visible. These areas are also not visible from houses farther north along Redlands Boulevard as they are not elevated enough to see all the way to Mystic Lake, although there may be some limited views in that direction from second-story windows facing east that are not blocked by other residences.

Users of the SJWA south of the site have views of the existing agricultural lands on the project site. Finally, residents in the few homes on the east side of Gilman Springs Road have views of the agricultural lands on the project site.

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Mount Russell, the Badlands, the SJWA, and Mystic Lake represent significant visual resources, and SR-60 and Gilman Springs Road are considered scenic routes because they have relatively unobstructed views of these resources.

This EIR analyzes the viewshed impacts of the project on (i) the residences along the west and southwest portions of the project site; (ii) the motoring public on SR-60 and Gilman Springs Road (designated scenic routes), Redlands Boulevard, Theodore Street, and Alessandro Boulevard; (iii) residences north of SR-60; and (iv) existing residences within the project area.

Figures 4.1.2 and 4.1.3A and B present a photographic key map and representative views of the project site.

4.1.1.4 Lighting and Visibility

The majority of the project area is currently very dark, with little or no ambient nighttime lighting other than from scattered rural residences and the SDG&E compressor facility. There is street lighting and general lighting along the western boundary of the site (i.e., along Redlands Boulevard) and from the Skechers warehouse building. The only other lighting comes from SR-60 along the northern boundary of the site. At present, Gilman Springs Road has no streetlights. Assuming “worst-case” conditions, current ambient light levels in the central and southern portions of the project site are assumed to be at or near zero foot-candles per square foot; this is the same unit of measurement used by professionals when referring to sky glow and nighttime light levels.

4.1.1.5 NOP/Scoping Comments

Many residents commented during the public scoping process that they were concerned about what the project would look like and about night lighting since the area is presently undeveloped and has no significant source of night lighting. Several commenters raised issues with future “night sky” impacts on the area.

4.1.2 Existing Policies and Regulations

4.1.2.1 City of Moreno Valley General Plan Policies

The following policies and goals pertain to aesthetics and are applicable to the proposed project:

Community Development

Objective 2.5 Promote a mix of industrial uses which provide a sound and diversified economic base and ample employment opportunities for the citizens of Moreno Valley with the establishment of industrial activities that have good access to the regional transportation system, accommodate the personal needs of workers and business visitors, and which meets the service needs of local businesses.

Policy 2.5.1 The primary purpose of areas designated Business Park/Industrial is to provide for manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities. 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 FAR should be significantly less.

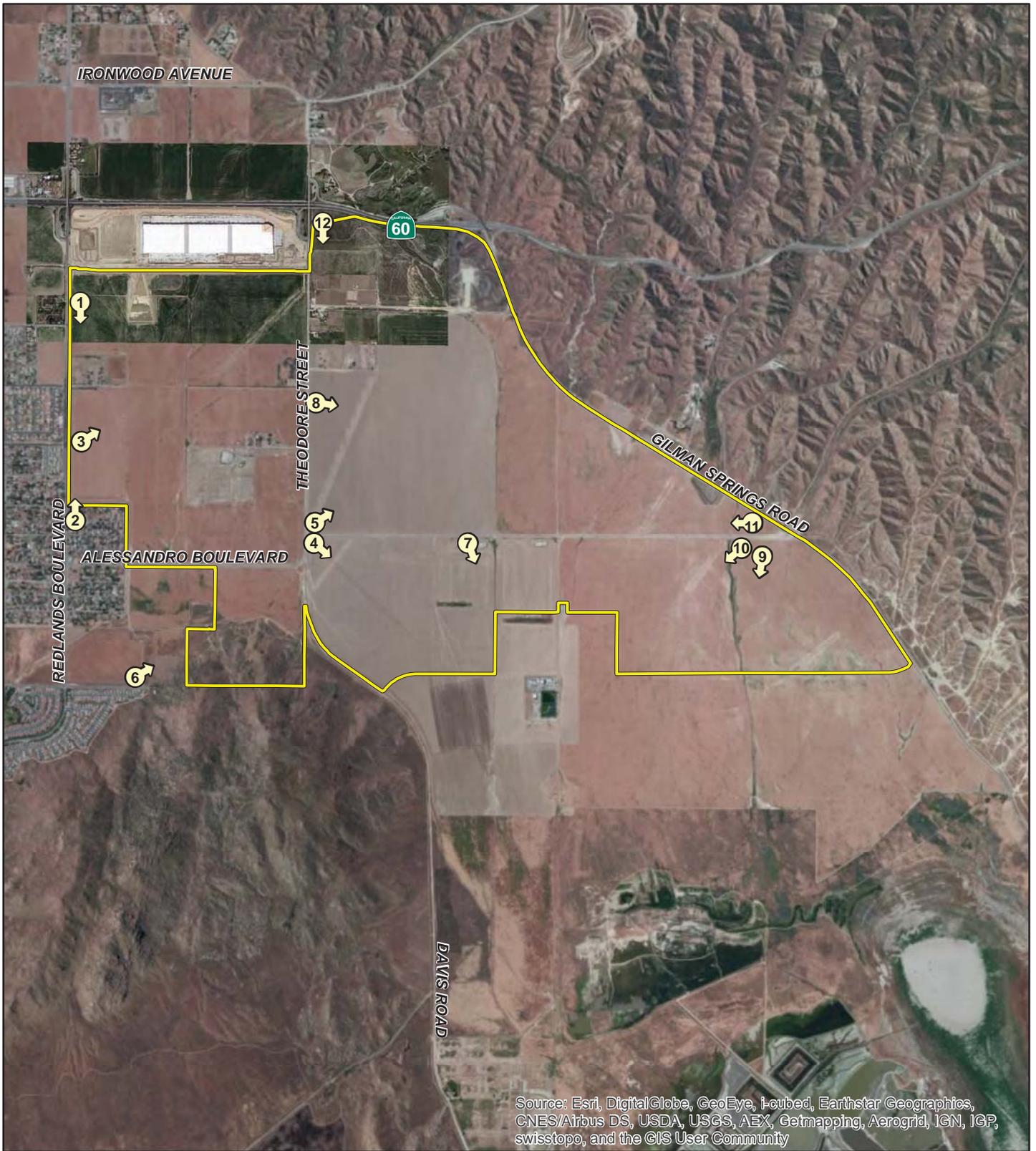
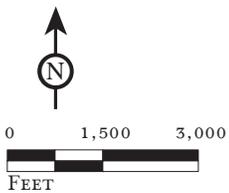


FIGURE 4.1.2

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-  Project Boundary
-  Photograph Location and Direction Taken

World Logistics Center Specific Plan Project
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Site Photograph Locations

SOURCE: ESRI World Imagery & Bing Aerial, 2010; Google Earth, 2011.

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PHOTOGRAPH 1: *View looking south along Redlands Boulevard from Eucalyptus Avenue.*



PHOTOGRAPH 2: *View looking north along Redlands Boulevard from Alessandro Boulevard.*



PHOTOGRAPH 3: *View looking northeast across western portion of site near Redlands Boulevard and Cottonwood Avenue.*



PHOTOGRAPH 4: *View looking southeast from Theodore Street and Alessandro Boulevard.*



PHOTOGRAPH 5: *View looking northeast from Theodore Street and Alessandro Boulevard.*



PHOTOGRAPH 6: *View looking northeast from southwest corner of site.*

LSA

FIGURE 4.1.3A

*World Logistics Center Specific Plan Project
Environmental Impact Report
Site Photographs*

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PHOTOGRAPH 7: *View of SDG & E Natural Gas Compressor facility (central portion of site).*



PHOTOGRAPH 8: *View of agricultural fields (typical) in central and eastern portions of site.*



PHOTOGRAPH 9: *View looking southwest toward Mystic Lake from near Gilman Springs Road.*



PHOTOGRAPH 10: *View looking southwest toward Lake Perris area from near Gilman Springs Road (SDG & E facility at right).*



PHOTOGRAPH 11: *View looking west along Alessandro Boulevard from near Gilman Springs Road.*



PHOTOGRAPH 12: *View looking south along Theodore Street from the SR-60 Freeway bridge.*

LSA

FIGURE 4.1.3B

*World Logistics Center Specific Plan Project
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Site Photographs*

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- Policy 2.5.2** Locate manufacturing and industrial uses to avoid adverse impacts on surrounding land uses.
- Policy 2.5.3** Screen manufacturing and industrial uses where necessary to reduce glare, noise, dust, vibrations, and unsightly views.
- Policy 2.5.4** Design industrial developments to discourage access through residential areas.
- 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.
- Policy 2.10.1** Encourage a design theme for each new development that is compatible with surrounding existing and planned developments.
- Policy 2.10.2** Screen trash storage and loading areas, ground and roof mounted mechanical equipment, and outdoor storage areas from public view as appropriate.
- 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 façades that are aesthetically pleasing.
- Policy 2.10.4** Landscaping and open spaces should be provided as an integral part of project design to enhance building design, public views, and interior spaces, provide buffers and transitions as needed, and facilitate energy and resource conservation.
- Policy 2.10.5** Development projects adjacent to freeways shall provide landscaped buffer strips along the ultimate freeway right-of-way.
- Policy 2.10.6** Buildings should be designed with a plan for adequate signage. Signs should be highly compatible with the building and site design relative to size, color, material, and placement.
- Policy 2.10.7** On-site lighting should not cause nuisance levels or glare on adjacent properties.
- Policy 2.10.8** Lighting should improve the visual identification of structures.
- Policy 2.10.9** Fences and walls should incorporate landscape elements and changes in materials or textures to deter graffiti and add visual interest.
- Policy 2.10.10** Minimize the use and visibility of reverse frontage walls along streets and freeways by treatments such as landscaping, berming, and “side-on” cul-de-sacs.
- Policy 2.10.11** Screen and buffer non-residential projects from adjacent residential property and other sensitive land uses when necessary to minimize noise, glare, and other adverse effects on adjacent uses.
- Policy 2.10.12** Screen parking areas from streets to the extent consistent with surveillance needs (e.g., mounding, landscaping, low profile walls, and/or grade separations).
- Policy 2.10.13** Provide landscaping in automobile parking areas to reduce solar heat and glare.

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Conservation Element

- Objective 7.7** Where practicable, preserve significant visual features, significant views, and vistas.
- Policy 7.7.3** Implement reasonable controls on the size, number, and design of signs to minimize degradation of visual quality.
- Policy 7.7.4** Gilman Springs Road, Moreno Beach Drive, and State Route 60 shall be designated as local scenic roads.
- Policy 7.7.5** Require development along scenic roadways to be visually attractive and to allow for scenic views of the surrounding mountains and Mystic Lake.

4.1.2.2 City of Moreno Valley Municipal Code

On September 11, 2012, the City Council adopted Ordinance 851, which amended various sections of the City Municipal Code, including Section 9.08.100 *Lighting* to address citywide night lighting standards. Among other things, it requires non-residential lighting to be fully shielded and directed away from surrounding residential uses. It also restricts non-residential lighting to not exceed 0.25 foot-candle of light measured from within five feet of any property line.

4.1.3 Methodology

Any evaluation of visual impacts is necessarily subjective; however, community aesthetic values can be used to evaluate changes in views within a particular community. These values are found in General Plan policies, zoning ordinances, and, where specific policies are absent, general design theory and visual analysis methods can be incorporated to evaluate aesthetic impacts. For the purposes of CEQA compliance, this analysis of visual impacts will focus on changes in the visual character of the project site that would result from the development of the proposed on-site uses, including the visual compatibility of on-site and adjacent uses, changes in vistas and viewsheds where visual changes would be evident, and the introduction of sources of light and glare. Impacts to the existing environment of the project site are to be determined by the contrast between the site's visual setting before and after the proposed development. In this analysis, emphasis has been placed on the transformation of the existing undeveloped conditions into urbanized uses. Although few standards exist to singularly define perceptions of aesthetic value, the degree of visual change can be measured and described in terms of visibility and visual contrast, dominance, and magnitude. Visual elevations and line-of-sight cross-sections from various vantage points around the project site are provided in Figures 4.1.4A-I, while computerized photographic renderings showing views of the site from different vantage points around the site are provided in Figures 4.1.5A-K.

NOTE: In Responses to Comments F-8-54 through -56 and G-51-40, the captions on several renderings were found to be incorrect and have since been corrected. In addition, several more renderings have been added to more fully illustrate potential views from areas surrounding the WLC site. These illustrations include one view toward Mt. Russell from SR-60 (traveling westbound on SR-60) and one additional view toward the Badlands and Mt. San Jacinto (traveling eastbound on SR-60).

Current residences southwest of the project site, as well as travelers along SR-60 and Gilman Springs Road are considered sensitive to the visual and aesthetic alteration of the project site. Where possible, the potential aesthetic impacts of the proposed project will be evaluated to determine if or the degree to which the project is consistent with applicable General Plan objectives and policies.

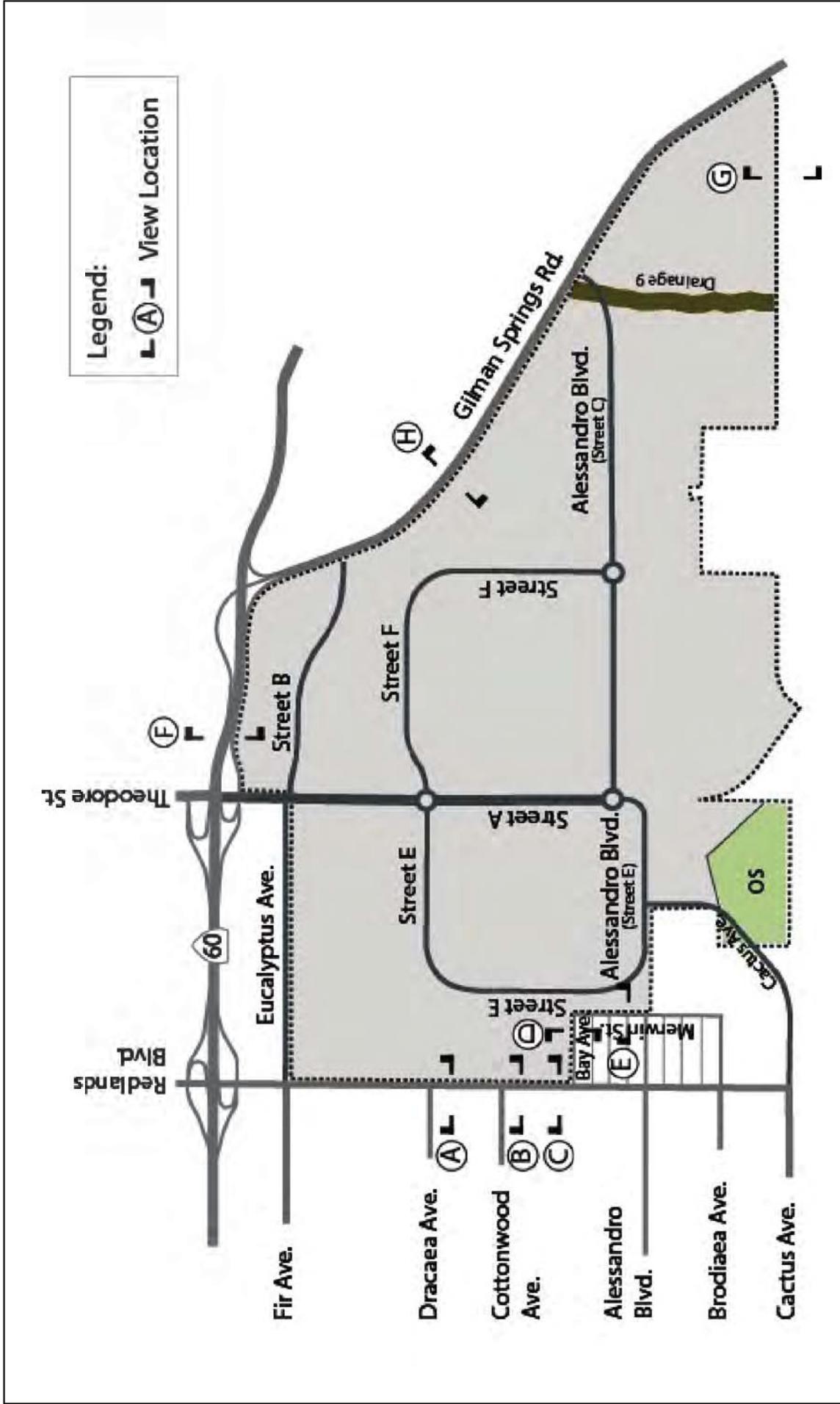
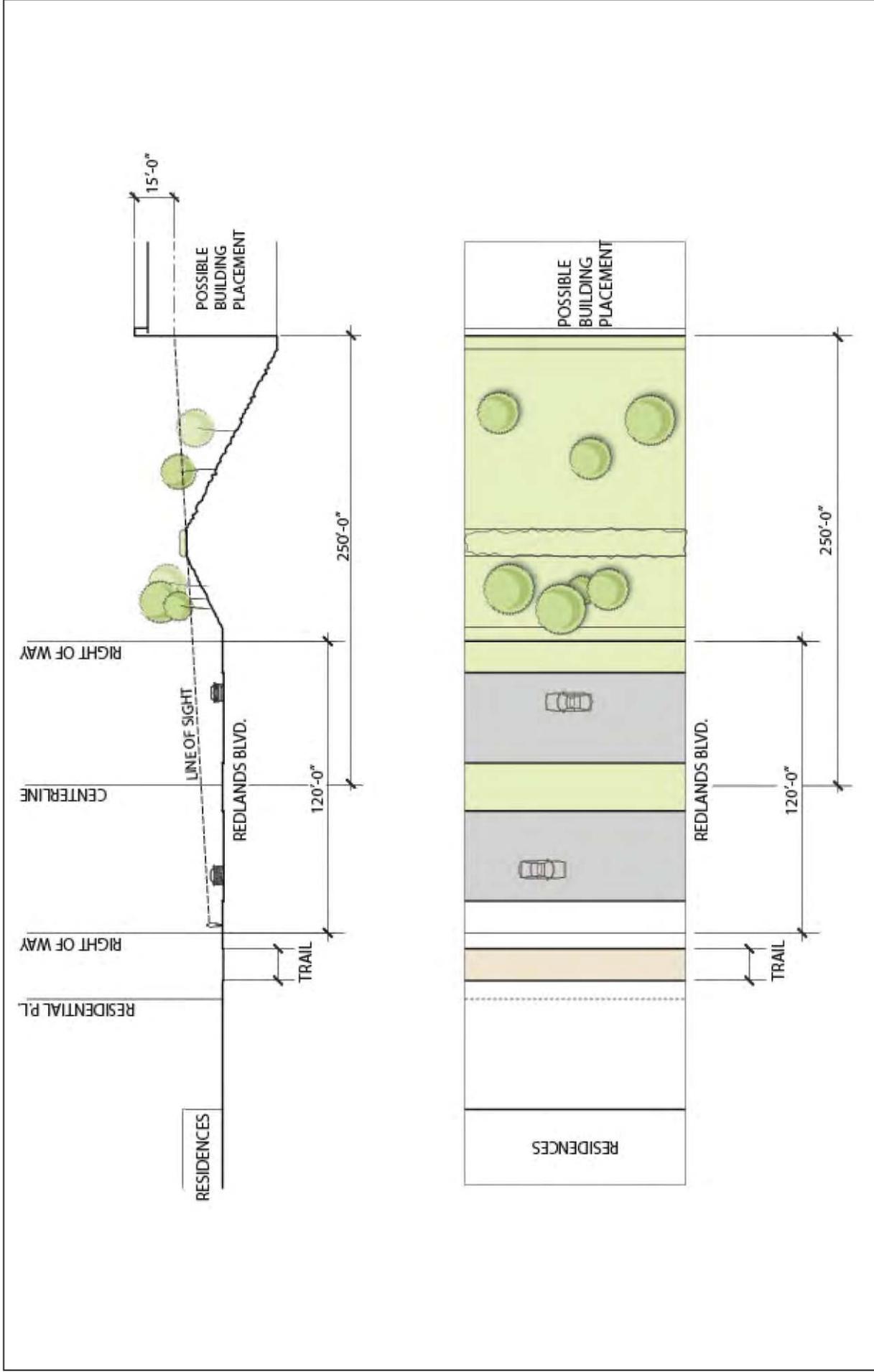


FIGURE 4.1.4

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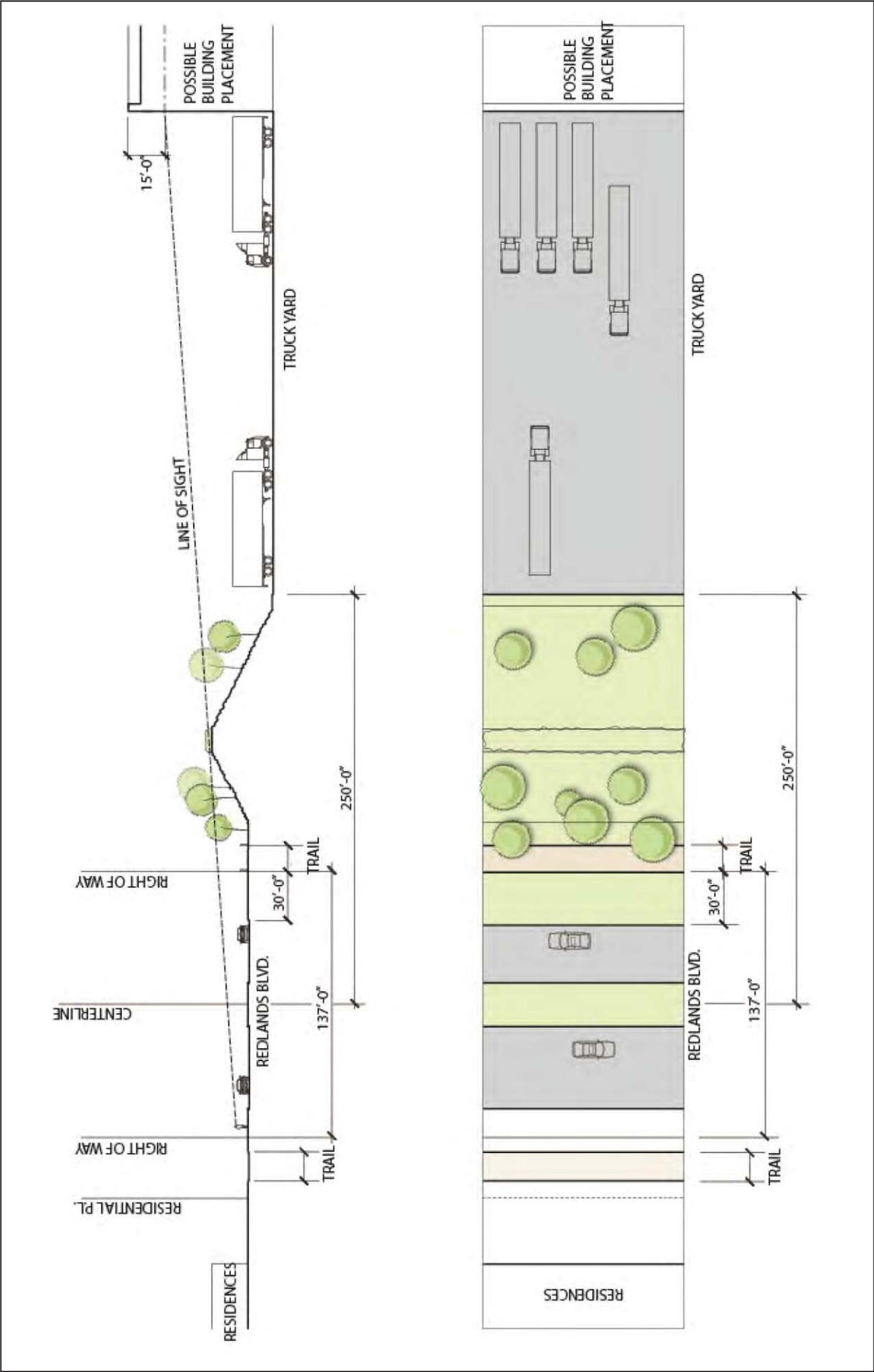


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FIGURE 4.1.4A

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Cross Sections and Line-of-Sight Diagrams
 Redlands Boulevard, Section A

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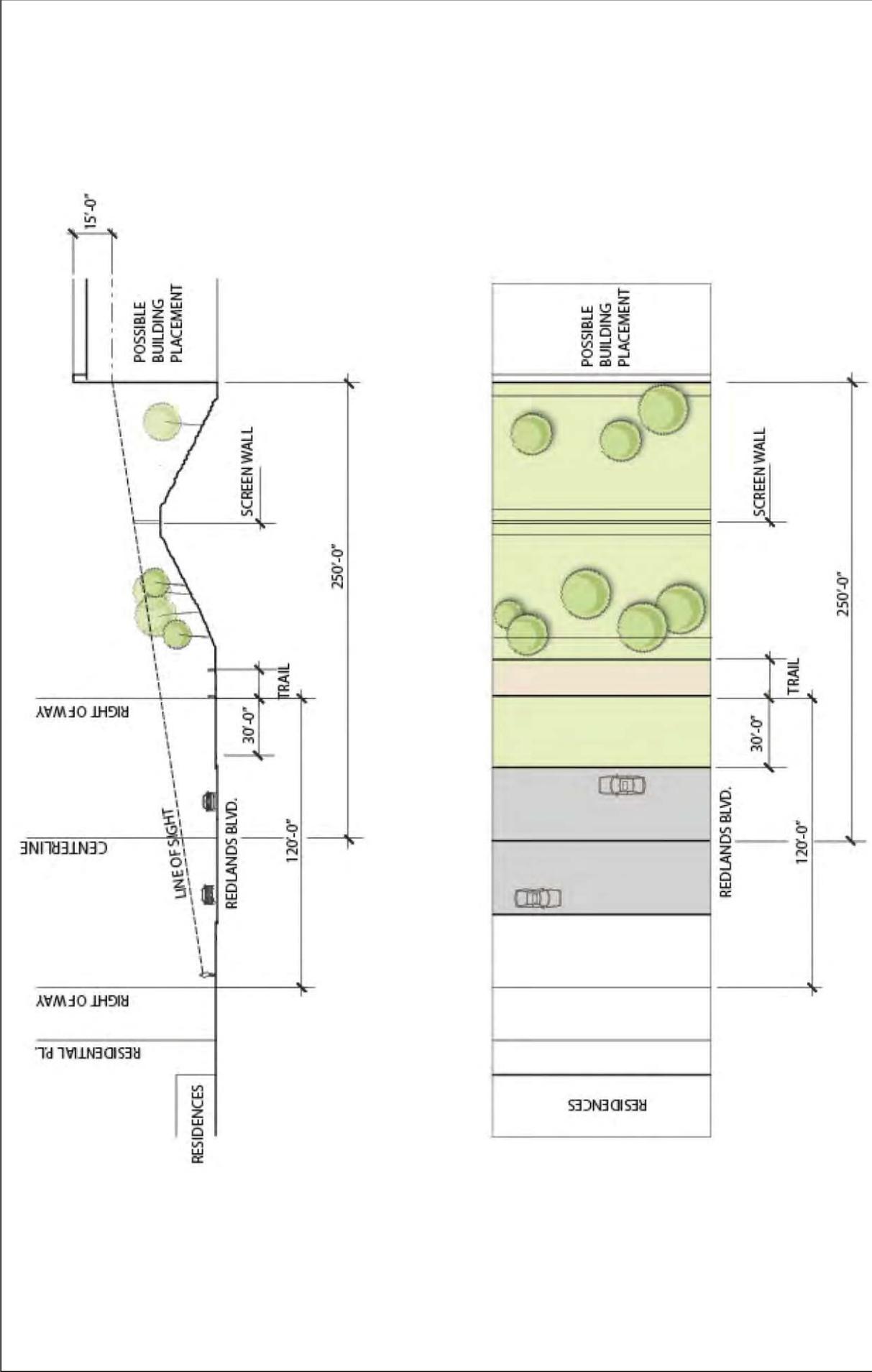


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FIGURE 4.1.4B

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Cross Sections and Line-of-Sight Diagrams
 Redlands Boulevard, Section B

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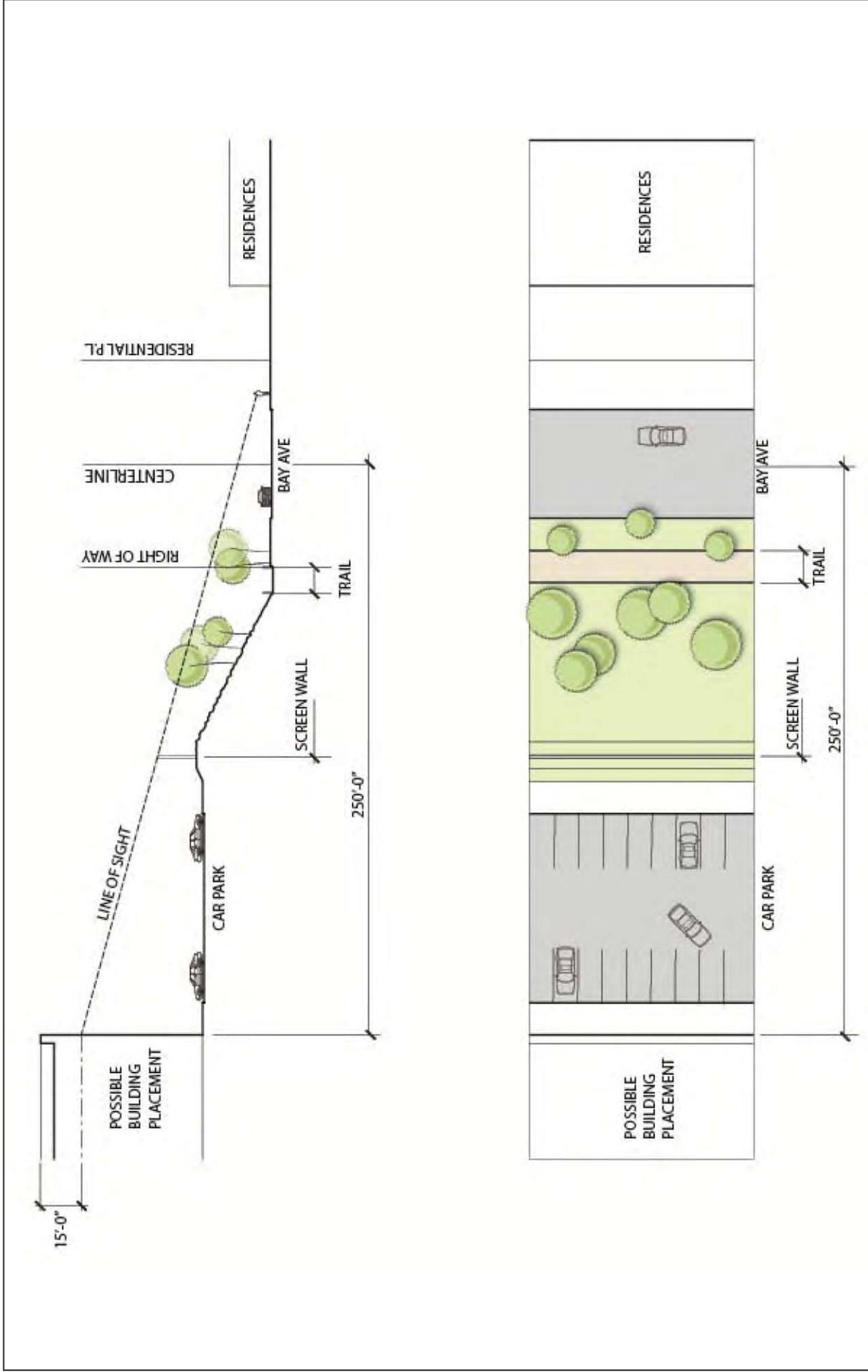


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FIGURE 4.1.4C

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Cross Sections and Line-of-Sight Diagrams
 Redlands Boulevard, Section C

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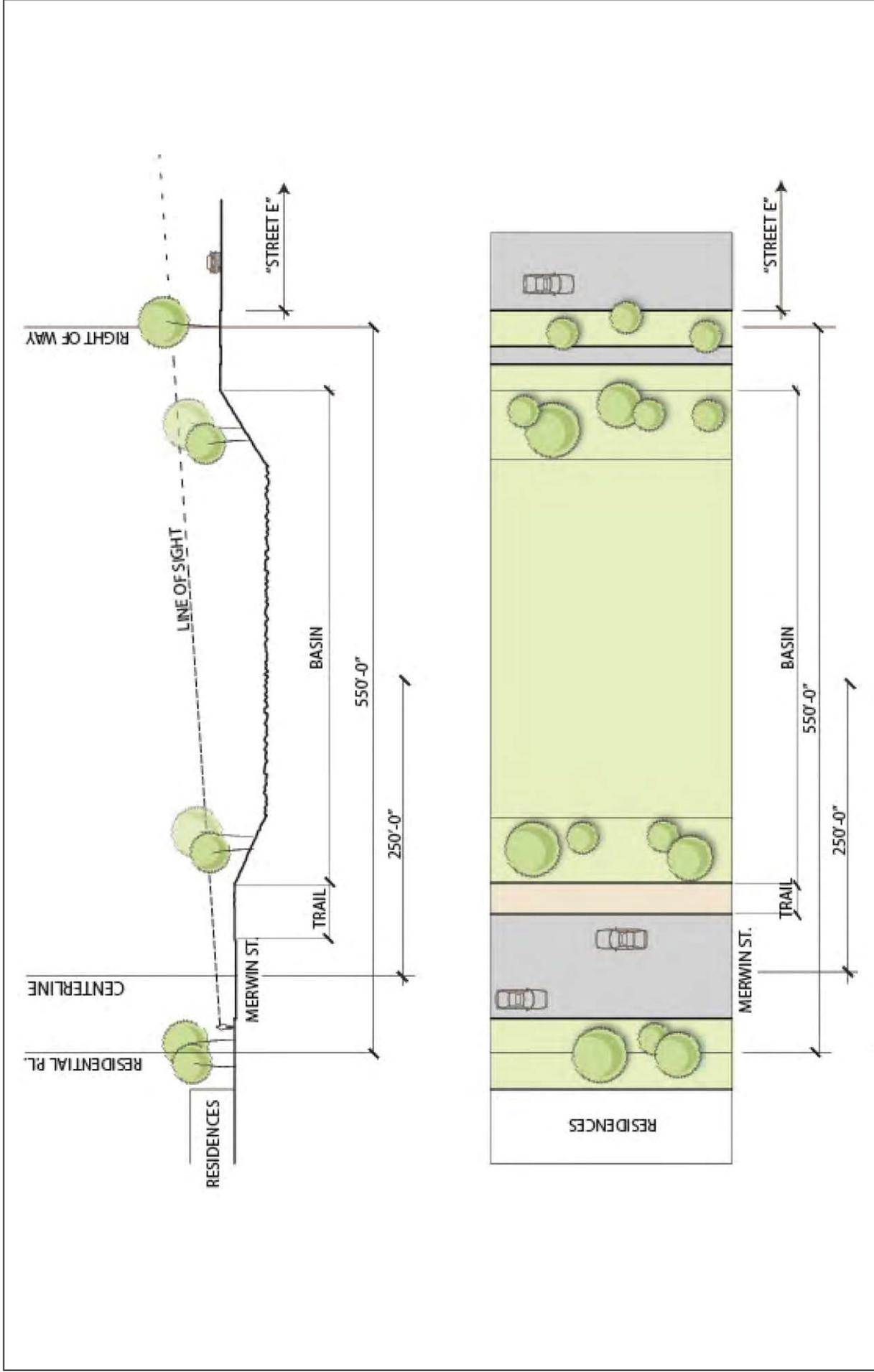


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FIGURE 4.1.4D

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Cross Sections and Line-of-Sight Diagrams
 Bay Street, Section D

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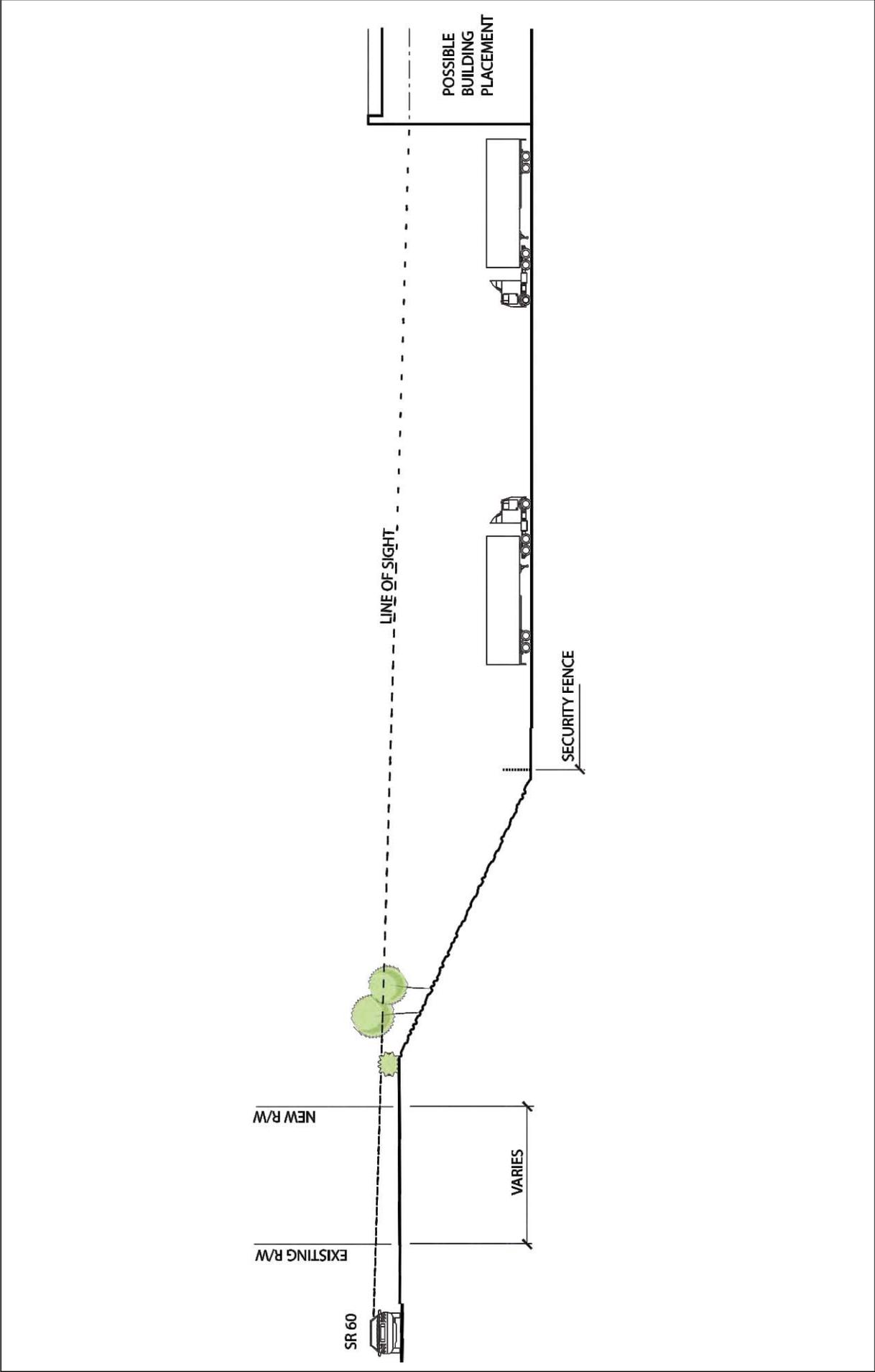


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FIGURE 4.1.4E

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Cross Sections and Line-of-Sight Diagrams
 Merwin Street, Section E

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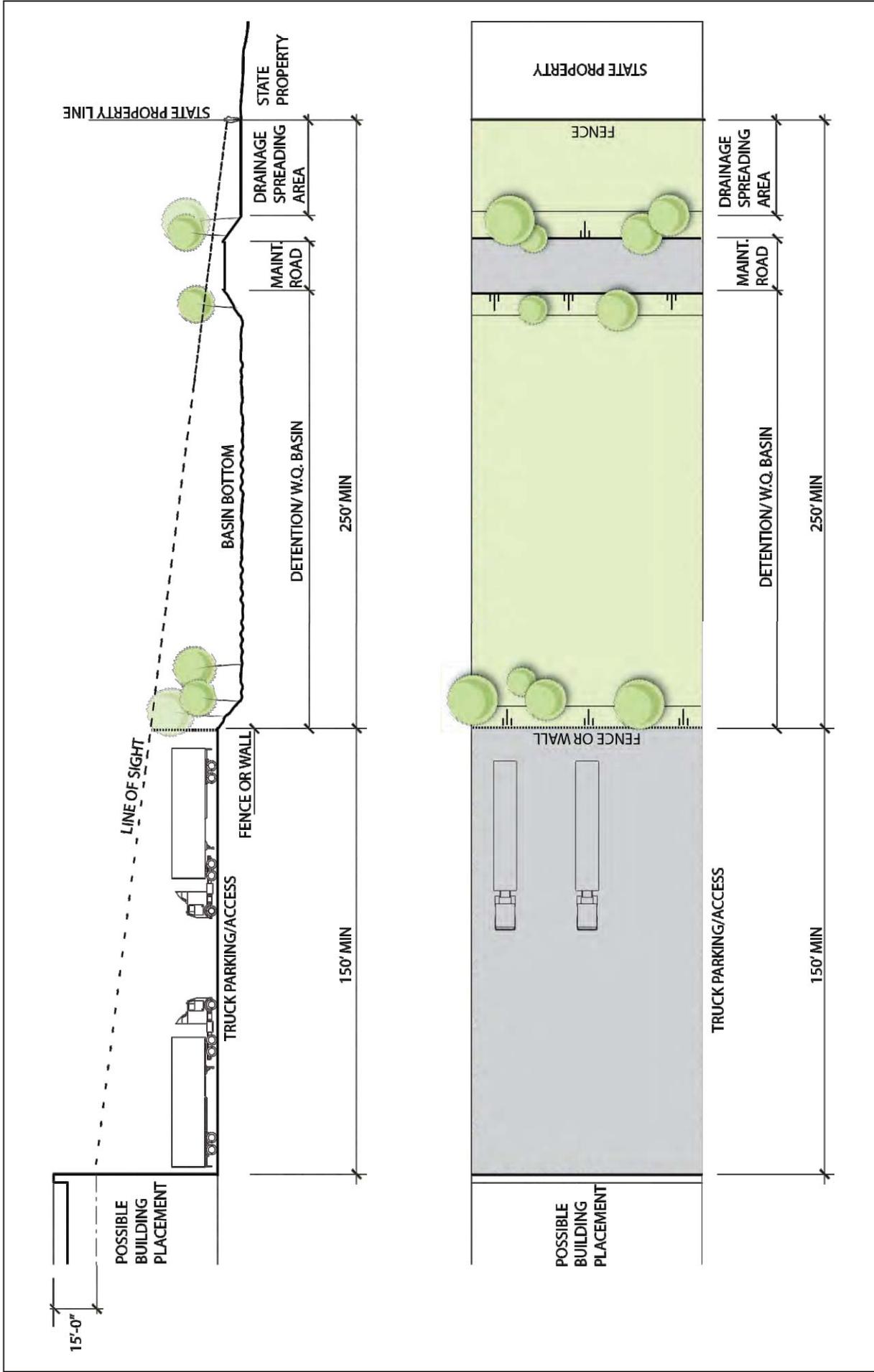
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FIGURE 4.1.4F

World Logistics Center Specific Plan Project
 Environmental Impact Report

Cross Sections and Line-of-Sight Diagrams
 SR-60 Between Theodore and Gilman Springs Road, Section F

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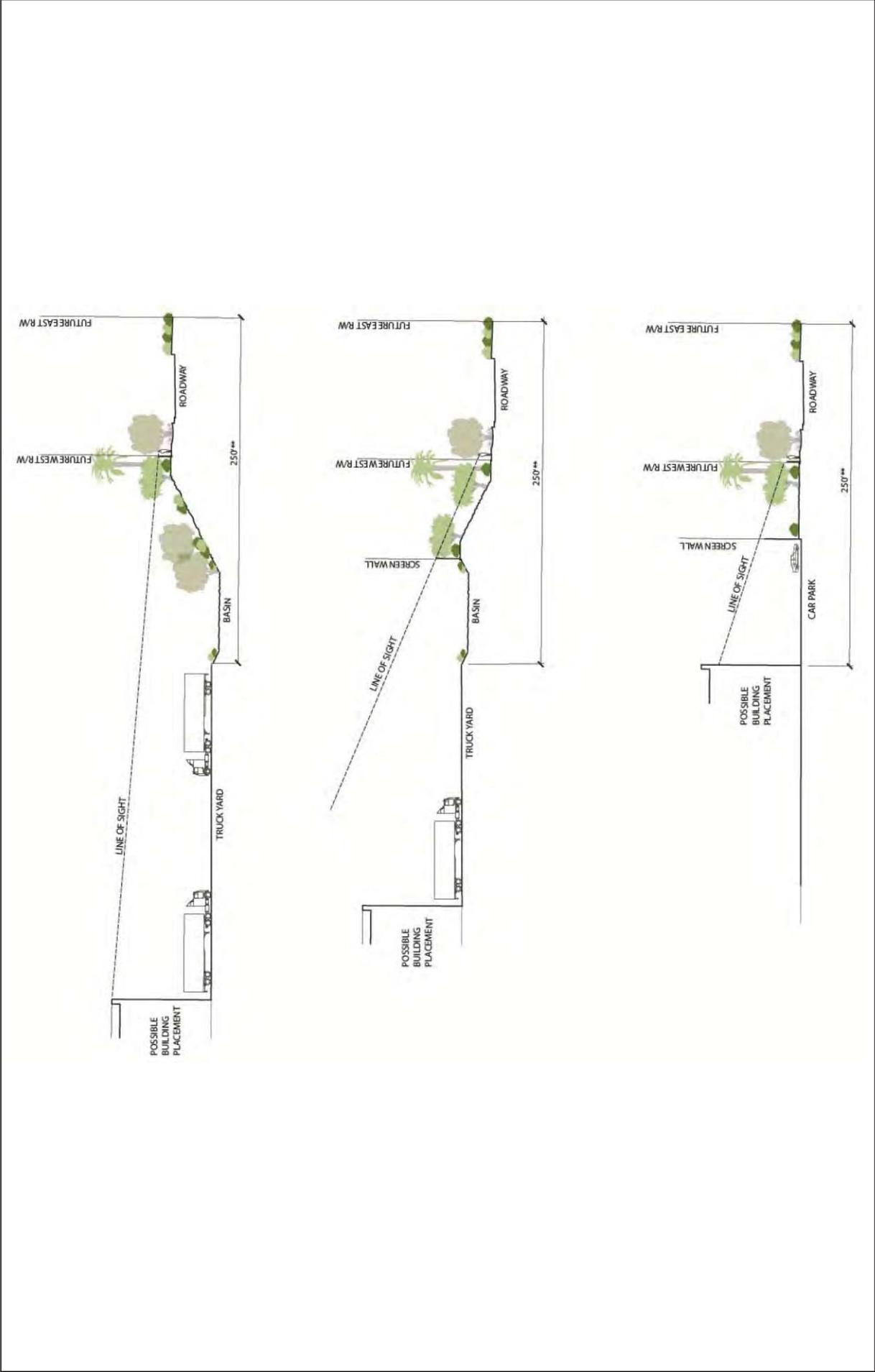


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FIGURE 4.1.4G

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Cross Sections and Line-of-Sight Diagrams
 Southern Boundary, Section G

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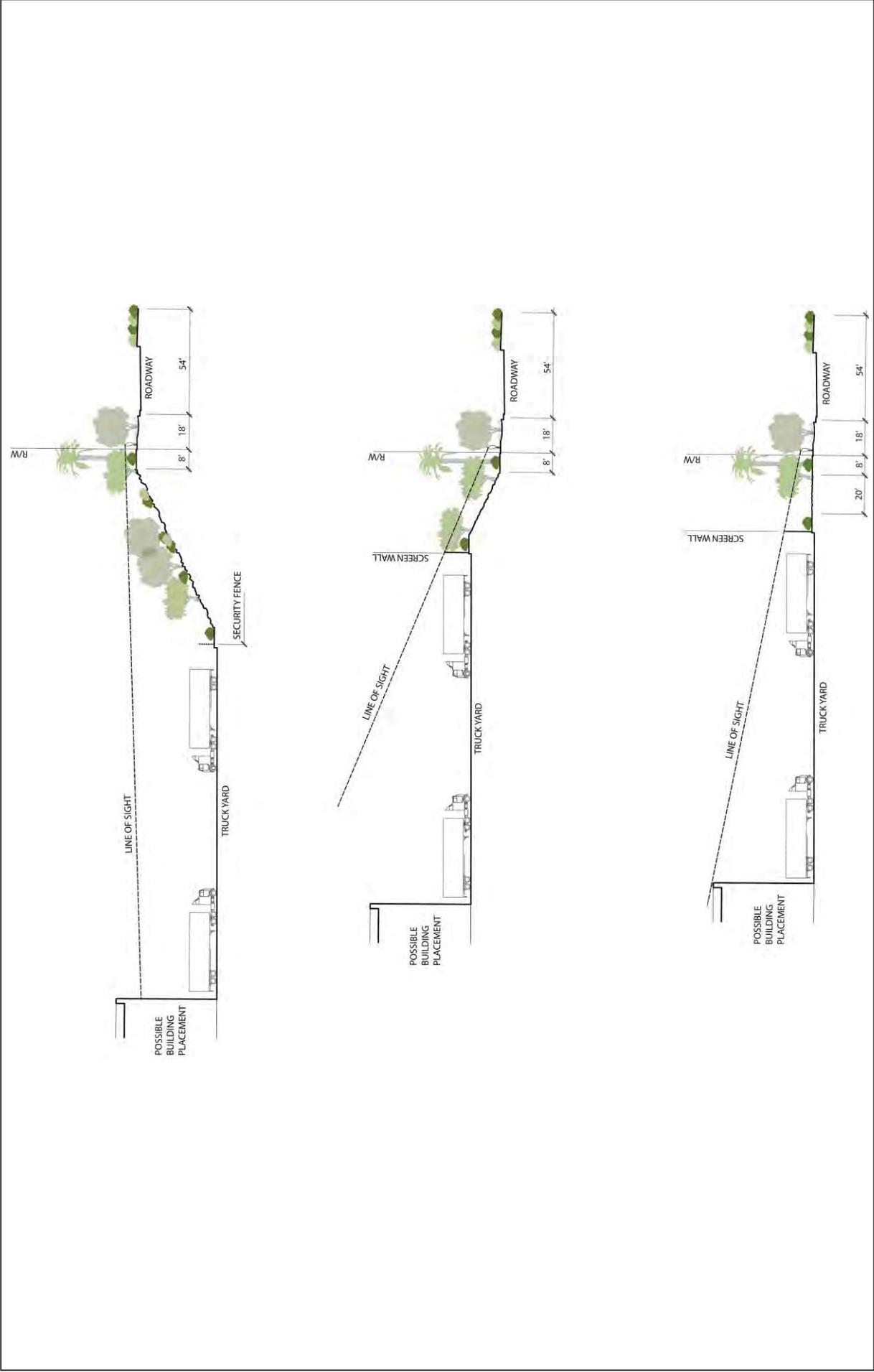
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FIGURE 4.1.4H

***Required setback to truck activity areas. A shorter setback is permitted subject to air quality and noise analyses.*

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Cross Sections and Line-of-Sight Diagrams
 Gilman Springs Road

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FIGURE 4.1.4I

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Cross Sections and Line-of-Sight Diagrams
 All Interior Roadways

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FIGURE 4.1.4J

World Logistics Center Specific Plan Project
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 Cross Sections and Line-of-Sight Diagrams
 Slope Planting Guideline

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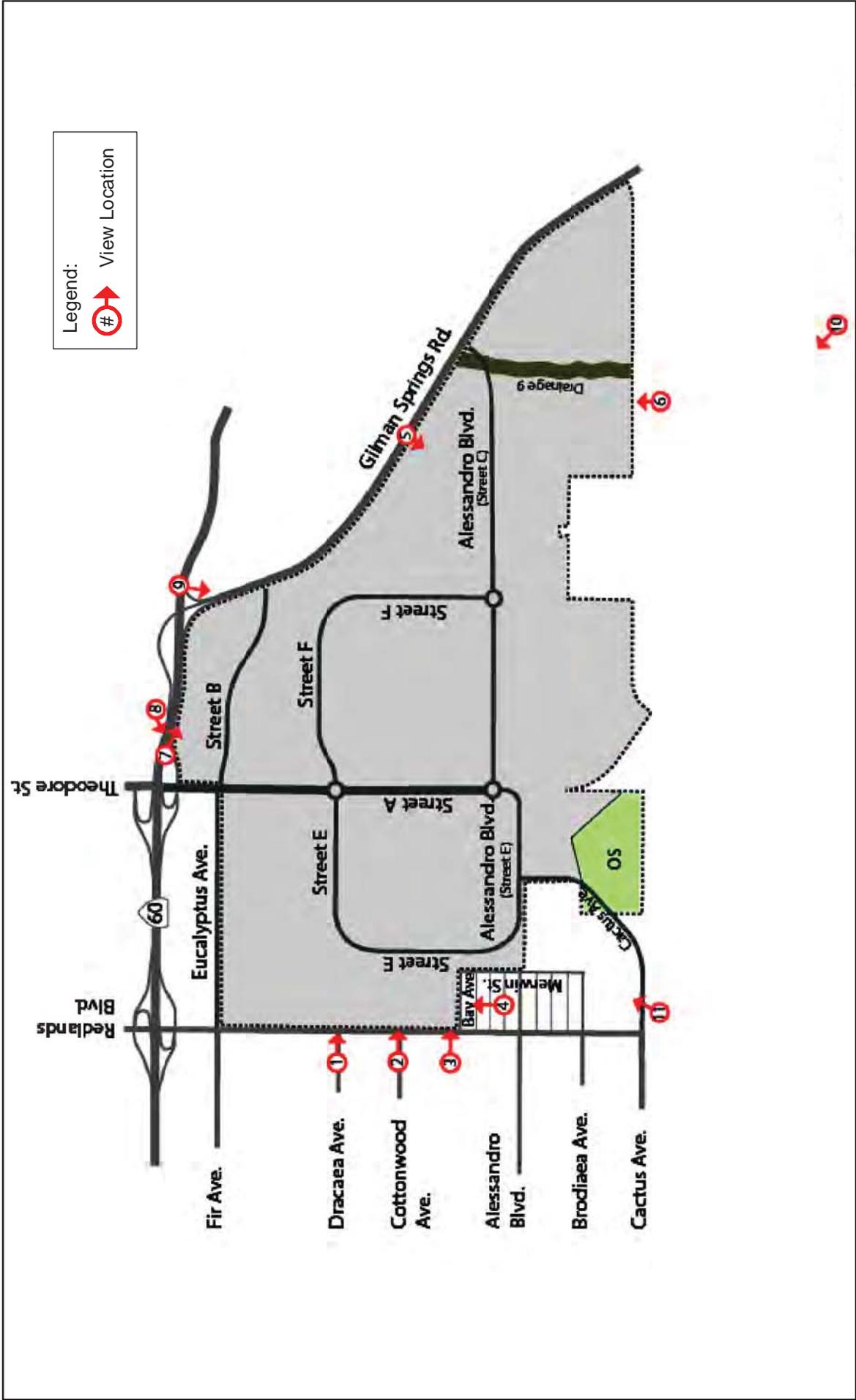
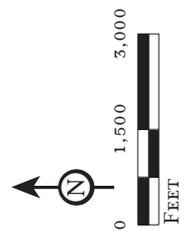


FIGURE 4.1.5A

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VIEW 1: Looking east across Redlands Boulevard at Dracaeca Avenue vegetation at installation.



VIEW 1: Looking east across Redlands Boulevard at Dracaeca Avenue vegetation at maturity.

LSA

FIGURE 4.1.5B

*World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings*

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VIEW 2: Looking east across Redlands Boulevard at Cottonwood Avenue vegetation at installation.



VIEW 2: Looking east across Redlands Boulevard at Cottonwood Avenue vegetation at maturity.

LSA

FIGURE 4.1.5C

World Logistics Center Specific Plan Project
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Computerized Photographic Renderings

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VIEW 3: Looking east across Redlands Boulevard at Bay Avenue vegetation at installation.



VIEW 3: Looking east across Redlands Boulevard at Bay Avenue vegetation at maturity.

LSA

FIGURE 4.1.5D

World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings

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VIEW 4: Looking north across Bay Avenue from east of Redlands Boulevard vegetation at installation.



VIEW 4: Looking north across Bay Avenue from east of Redlands Boulevard vegetation at maturity.

LSA

FIGURE 4.1.5E

World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings

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VIEW 5: Looking east across Gilman Springs Road at vegetation at installation.



VIEW 5: Looking east across Gilman Springs Road at vegetation at maturity.

LSA

FIGURE 4.1.5F

World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings

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VIEW 6: *Looking north from vegetation at installation.*



VIEW 6: *Looking north toward southern Project Boundary vegetation at maturity*

LSA

FIGURE 4.1.5G

*World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings*

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VIEW 7: Looking southeast heading eastbound from SR-60 vegetation at installation.



VIEW 7: Looking southeast heading eastbound from SR-60 vegetation at maturity.

LSA

FIGURE 4.1.5H

World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings

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VIEW 8: Looking southwest heading westbound from SR-60 vegetation at installation.



VIEW 8: Looking southwest heading westbound from SR-60 vegetation at maturity.

LSA

FIGURE 4.1.5I

World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings

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VIEW 9: Looking south across Gilman Springs Road at vegetation at maturity.



VIEW 10: Looking northwest from within San Jacinto Wildlife Area.

LSA

FIGURE 4.1.5J

World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings

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VIEW 11: Looking northeast from the corner of Cactus Avenue and Madrid Avenue.

LSA

FIGURE 4.1.5K

*World Logistics Center Specific Plan Project
Environmental Impact Report
Computerized Photographic Renderings*

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4.1.4 Thresholds of Significance

Appendix G of the *CEQA Guidelines* recognizes the following significance thresholds related to aesthetics. Based on these significance thresholds, a project would have a significant impact on aesthetic resources if it would result in:

- A substantial adverse effect on a scenic vista;
- Substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- Substantial degradation of the existing visual character or quality of the site and its surroundings; and/or
- A new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

4.1.5 Less than Significant Impacts

Due to the size and location of the project, and due to the fundamental and permanent alteration of the aesthetic characteristics of the site, all aesthetic impacts were determined to be potentially significant.

4.1.6 Significant Impacts

4.1.6.1 Scenic Vistas

Impact 4.1.6.1: *The proposed project would have a substantial significant effect on a scenic vista.*

Threshold	Would the proposed project have a substantial adverse effect on a scenic vista?
-----------	---

The proposed project could have a substantial adverse effect on one or more scenic vistas, notably views of the Badlands, Mount Russell and the Mount Russell Range, and Mystic Lake/San Jacinto Wildlife Area. For the proposed project, the nearest sensitive permanent visual receptors would be the existing single-family residences to the west and southwest along Redlands Boulevard. In addition, the views of the motoring public along SR-60, Gilman Springs Road, Redlands Boulevard, Theodore Street, and Alessandro Boulevard would be significantly affected as well. At present, the Skechers building blocks views of the site for travelers on SR-60 who are immediately north of the Skechers building.

One of the development goals of the Specific Plan is to have the heights of the buildings along the north, west and south perimeter of the site, including SR-60, be approximately the same height as the existing Skechers building (i.e., approximately 55 feet above a ground elevation of 1,740 feet amsl). This means, as the site elevation decreases to the south, taller buildings theoretically could be built as long as they do not exceed 1,795 feet elevation (i.e., height above sea level, not building height above ground). This would result in seeing only the buildings adjacent to the freeway for eastbound travelers on SR-60, but it would adversely affect views from other locations around the WLC Specific Plan site regardless of the height comparison to the Skechers building. The motoring public heading westbound on SR-60 would experience impacts to their views of Mount Russell.

Along Gilman Springs Road and away from the perimeter of the site, the Specific Plan allows warehouse buildings that may reach a height of 80 feet. These buildings would have a maximum altitude of 1,795 feet. The potential heights of project buildings, and possible viewshed impacts of future development under the Specific Plan, are shown in previously referenced Figure 4.1.5, which provides computerized photographic renderings of the proposed project building and landscaping.

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As stated previously, the project will allow a maximum of 60-foot tall warehouse buildings along the west, north, and south perimeters of the site, and 80-foot buildings on the “interior” portions of the site and along the eastern perimeter (i.e., Gilman Springs Road). Ground elevations range from 10 to 30 feet lower than Gilman Springs Road, which will help reduce visual impacts of warehouse buildings in the eastern portion of the site. The existing Skechers building at the northwest corner of the site can be seen from almost anywhere on the project site at present, and from surrounding off-site areas. Other warehouse buildings within the project will be at least that prominent when they are built.

Section 5.0 of the WLCSP contains architectural and design guidelines that will encourage the construction of attractive warehouse buildings and surrounding grounds. This is supported by the examples of building designs, materials, colors, and landscaping illustrations in the Specific Plan. The general development, setback, architectural design, and landscaping guidelines of the WLCSP require future development to provide attractive warehouse buildings with native plants and trees to help screen views of the lower portions of the buildings.

The Skechers building is mainly white, and the WLCSP indicates that future warehouse buildings on site will also be white or light colored to minimize energy consumption, provide architectural compatibility, and reflect heat to minimize the urban “heat island” effect (see also Section 5.3.13 Sustainability). Based on current views of the Skechers building, these new buildings will also be visible from various off-site locations (e.g., north of SR-60 and east of Gilman Springs Road). However, white or light-colored buildings, like Skechers, may be more visible at longer distances compared to darker or earth-toned buildings.

General View Impacts from Existing Residences. The Specific Plan establishes a minimum setback of 250 feet along the west boundary of the project site between sensitive receptors (i.e., houses) and buildings or parking/circulation areas within the WLCSP. The Specific Plan also includes specific landscaping and other design criteria for this buffer (see WLCSP Section 4.2, *Offsite Landscaping*). It should be noted that the width of the adjacent street outside of the WLC project boundaries (e.g., Redlands Boulevard, Bay Avenue, and Merwin Street) is included in the 250-foot buffer distance.

The line-of-sight exhibits and the photographic renderings help predict how the WLCSP project will appear as buildings are constructed. Figures 4.1.4A-E include typical cross-sections that show the 250-foot setback as measured from the center line of Redlands Boulevard and Merwin Street, and the center line of Bay Avenue. Not counting the existing street widths, the new landscaping setback/berm areas along the west side of the WLCSP will be approximately 150 feet wide (e.g., from the east side of Redlands Boulevard to the nearest truck activity area). These setbacks, and the proposed landscaping within the setback areas, are shown in previously referenced Figures 4.1.4A-E and 4.1.5A-F (Views 1-5). Section 4.2 of the Specific Plan describes and illustrates how the landscaping will appear both upon installation and at maturity (photographic renderings of these conditions are also shown in Section 4.2, *Offsite Landscaping*).

As development of the proposed project occurs, buildings, associated parking lots, and landscaping will be built on the project site. This will change existing views from virtually every point in and around the project site. Foreground and midground views would consist of trees, ornamental landscaping, and new warehouse buildings. Most background views will be affected as well with limited distant views of the Badlands, Mount San Jacinto, and Mount Russell remaining from some adjacent properties and roadways. Although the warehouse buildings and the single-family residences would be separated by some distance, the proposed project will result in the reduction or elimination of existing background views.

Views from SR-60. The existing Skechers building can be used as a visual reference relative to future views involving the WLCSP. The average floor elevation of the Skechers facility is 1,740 feet amsl. Assuming an average building height of 55 feet, the Skechers building is at an elevation of 1,795 feet amsl compared to the elevation of SR-60 at 1,760 feet amsl adjacent to the Skechers building. This means a person driving on SR-60 cannot see much of the WLCSP property, or Mystic Lake while adjacent to the Skechers building, although the top of Mount Russell is visible from most locations.

Travelers in both directions on SR-60 will have views of the project site until the northernmost portion of the site is developed. As the site develops, the buildings would replace existing flat agricultural fields with industrial buildings, which may block foreground and midground views of travelers in both directions, depending on their locations. There are no site plans at present to show exact building locations or heights, so the determination of impacts must be based on the characteristics of buildings allowed under the Specific Plan. Buildings adjacent to the freeway would be approximately 60 feet in height, while buildings away from the northern perimeter (i.e., the south side of SR-60) could be up to 80 feet tall. If all of the future buildings along the south side of SR-60 block views to the same degree as the Skechers building, this would be a significant visual impact as it would reduce views of Mount Russell, and the Badlands south of SR-60 along Gilman Springs Road.

The height and location of buildings along this portion of the project will have to be designed to allow background views between and over them (i.e., so the mountains and Mystic Lake are not fully or largely obscured by buildings in the future). The conceptual landscape plans for the proposed project show trees will be planted along the south side of SR-60 to soften views of future buildings, but these will not fully obscure views of the buildings or parking areas, as the buildings may be taller than the trees will grow, and the buildings will extend farther into the midground and background views for many travelers. Even with the landscaping proposed by the WLC Specific Plan, development of this area will eventually replace the existing flat agricultural fields with tall industrial warehouse buildings that may completely or partially block views of the lower slopes of Mount Russell and the Badlands. If future buildings were to block views of these major scenic resources substantially (per GP Figure 7-2), the WLC project would result in significant visual impacts along SR-60. The simulated view from SR-60 is shown in Figure 4.1.5J and K (Views 8 and 9).

Views from Gilman Springs Road. Travelers in both directions on Gilman Springs Road will have extensive views across the project site until the easternmost portion of the site is developed. As the site develops, the buildings would replace existing flat agricultural fields with industrial buildings. Buildings constructed in the eastern portion of the site may block foreground and midground views for travelers in both directions, depending on the location of the building and the traveler. There are no site plans at present to show exact building locations or individual building size/mass or heights, so the determination of impacts must be based on the characteristics of buildings allowed under the Specific Plan. Buildings adjacent to the roadway would be approximately 80 feet in height, while buildings away from the eastern perimeter (i.e., the west side of Gilman Springs Road) could be up to 80 feet tall. If all of the future buildings along the west side of Gilman Springs Road block views to the same degree as the Skechers building, this would be a significant visual impact as it would - reduce views of Mount Russell to the west and views of Mystic Lake to the south. The height and location of buildings along this portion of the project will have to be designed to allow background views between and over them (i.e., so the mountains and Mystic Lake are not fully or largely obscured by buildings in the future). The conceptual landscape plans for the proposed project show trees will be planted along the west side of Gilman Springs Road to soften views of future buildings, but these will not fully obscure views of the buildings or parking areas, as the buildings may be taller than the trees will grow, and the buildings will extend farther into the midground and background views for many travelers. Even with the landscaping proposed by the WLC Specific Plan, development of this area will eventually replace the existing flat agricultural fields with tall industrial warehouse buildings, which may completely or partially block views of the lower slopes of Mount Russell and Mystic Lake. If

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future buildings block views of these major scenic resources substantially (per GP Figure 7-2), the WLC project would result in significant visual impacts along Gilman Springs Road. The simulated view from this vantage point is shown in Figure 4.1.5G (View 6).

On-site Views. As the WLC project is developed, views from the various rural residences on site will become increasingly blocked, depending on the relative locations and heights of buildings. Over time, these views will be blocked by new logistics warehouse buildings.

In addition to the cross-sections in the WLCSP, LPA Architects created photographic renderings at nine locations to illustrate existing and future views from various vantage points around the WLC site. The following analysis of views is organized by the corresponding rendering(s). These renderings used actual photographs of the sites and superimposed a rendering of potential future buildings within the WLCSP, consistent with Specific Plan development guidelines. These renderings represent possible architectural treatments under the WLCSP design guidelines.

Views from Residences Southwest of the Site. As the project develops, views of the project site from existing residences southwest of the site will fundamentally change from vacant agricultural land to an urbanized logistics campus with major warehouse buildings, roadways, landscaping, and signage. The change in views would be softened somewhat by landscaping, which will be subject to the architectural and landscaping design guidelines outlined in the Specific Plan. All building proposals will be subject to a discretionary plan review process by the City with the opportunity for the public input and comment.

The WLCSP restricts building heights to 60 feet along the perimeter of the project, with the exception of along Gilman Springs Road, and 80 feet for non-perimeter buildings. The WLCSP also allows for the building office entrances and corners to be slightly higher than the main portions of buildings. By comparison, single-family residences southwest of the proposed project have an approximate maximum height of 18 feet for single-story homes and 30 feet for two-story homes. It should be noted that there is an existing windrow of olive trees along the east side of Redlands Boulevard between Cottonwood Avenue north to 700 feet north of Dracaea Avenue (almost 1,800 feet or a third of a mile in total). This windrow would help soften views of the WLCSP site from the homes west of the windrow for as long as the windrow remains in place.

The WLCSP requires that a landscaped berm be installed along the Redlands Boulevard right-of-way to soften project views from residential areas to the west. The Specific Plan requires that all truck accessways and loading areas be at least 250 feet from residential properties along Redlands Boulevard, Bay Avenue, and Merwin Street. The Specific Plan includes renderings of potential future buildings, which illustrate that future buildings will be largely screened by the landscaped berm and other landscaping. While the Specific Plan requires the use of native, drought-tolerant species throughout the project site, the areas adjacent to residential uses along Redlands Boulevard, Bay Avenue, and Merwin Street will receive a more extensive landscape treatment (WLCSP Section 4.2.4 refers these as special edge treatment area). However, landscaping will take a number of years to mature to a height that would soften views from residential areas. Even with the setbacks, berms, walls, and landscaping required by the WLC Specific Plan, the proposed development will fundamentally change views generally available to the public in this area (i.e., area residents driving or walking along Redlands Boulevard, Bay Avenue, and Merwin Street). This is a significant impact and requires mitigation. The photographic renderings for the project show proposed landscaping upon installation and at maturity (assumed to be approximately 15 years) for each rendered location (refer to Figures 4.1.5B-F, Views 1-5).

Views from the South. The existing view from the San Jacinto Wildlife Area north toward the Badlands will eventually be blocked by future buildings, resulting in visual impacts from this area. Buildings in this area will be setback from the SJWA boundary a minimum of 400 feet and limited in height to 60 feet, Figure 4.1.6A shows the location of three special edge treatment areas. Cross section and line of site diagrams are shown for the edge treatments in Figures 4.1.4A through 4.1.4I. Additional information on the Southern Boundary is shown in Figure 4.1.6B.

Views from the East. Permanent views from existing residences east of Gilman Springs Road will fundamentally change. The views they now have of the agricultural fields on the project site will eventually be replaced by a view of an urbanized area consisting of warehouse buildings, parking areas, streets, and ornamental landscaping. The proposed buildings will not block views of the Mount Russell Range to the southwest but may block or partially block views of the Mystic Lake area.

Transient/Motorist Views along Gilman Springs Road. Transient views for travelers on Gilman Springs Road will fundamentally change over time, as future buildings within the WLCSP will be visible to travelers in both directions, replacing existing views of agricultural fields. Eventually buildings within the Specific Plan may block or partially block views of the lower slopes of the Mount Russell Range, as well as distant views of Mystic Lake for southbound drivers. This is a potentially significant impact requiring mitigation.

Transient/Motorist Views along SR-60. Transient views for travelers on SR-60 will fundamentally change over time, as future logistics buildings will be visible to travelers in both directions as development occurs in the project area, replacing existing views of agricultural fields. Eventually buildings within the Specific Plan may block or partially block views of the lower slopes of the Badlands and the lower slopes of the Mount Russell Range, as well as views of Mystic Lake southbound depending on the driver's location and viewing angle. Mystic Lake is not visible for travelers along SR-60; therefore buildings will not block views of the lake for those traveling along SR-60.

Views from the North. Permanent views for residences north of SR-60 will change, and the upper portions of some of the future logistics buildings closest to SR-60 may be visible above the freeway. For residences that are elevated, views across the freeway may be more extensive and residents may see more of the WLC project as it develops. The proposed buildings are not expected to block views of the Mount Russell Range to the south or the Badlands to the southeast, but may eventually completely or partially block distant views of the vacant agricultural land and of Mystic Lake.

Views related to Off-site Improvements. Most project-related infrastructure improvements will not change existing views except for the future Theodore Street/SR-60 interchange improvements. When this interchange is rebuilt, views from some homes northwest of the intersection (i.e., looking southeast) may be incrementally affected by a larger, possibly higher bridge structure, depending on the ultimate design.

Construction of three off-site reservoir tanks will affect views of neighbors living near the new tanks. A new 1860 Zone tank southeast of SR-60/Gilman Springs Road and a new Zone 1967 tank just east of Theodore Street/Ironwood Avenue may be visible to some residents living northwest of Theodore Street/SR-60. In addition, a new 1764 Zone tank off of Cottonwood Avenue west of Redlands Boulevard may be visible to some residents living off of or driving along Cottonwood Avenue (see previously referenced Figure 3.13, *Water System*). However, views of a water tank are incremental and generally consistent with suburban areas, so these changes in views would not be considered significant.

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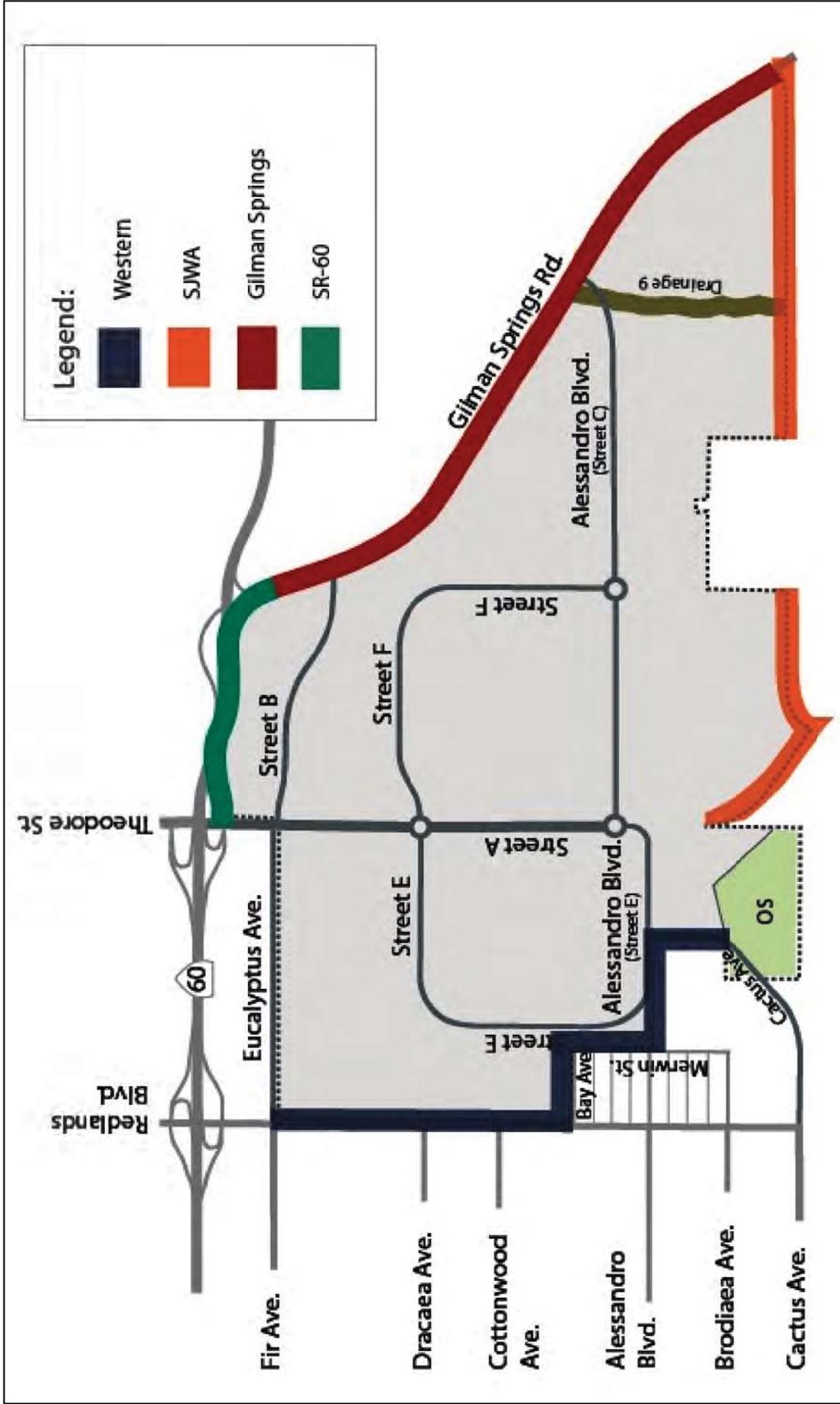


FIGURE 4.1.6A

L S A



No Scale

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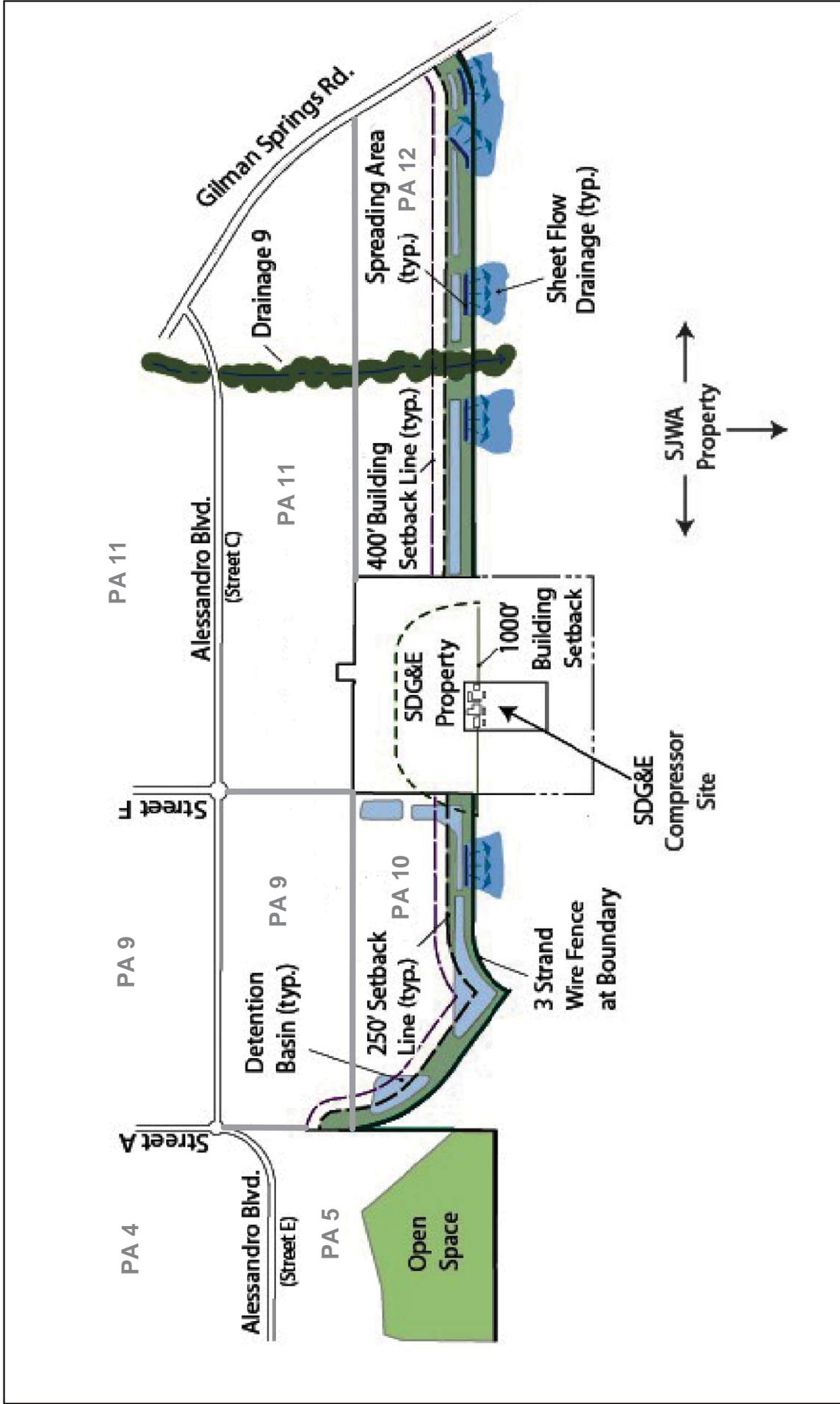


FIGURE 4.1.6B

LSA



PA # Planning Area

No Scale

SOURCE: HF, September, 2014.

F:\HFV\201\Reports\EIR\fig4-1-6B_SouthernEdgeTreatment.mxd (2/10/2015)

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General Plan Policies. These anticipated visual changes, while substantial, are generally consistent with General Plan Objective 7.7 in the Conservation Element regarding visual resources, which states, “Where practicable, preserve significant visual features, significant views, and vistas.” Based on the analysis in the preceding section, the WLCSP can preserve significant visual features, significant views, and vistas if the size and location of buildings developed under the WLCSP can be controlled so as to not substantially block views of Mount Russell, the Badlands, and Mystic Lake. The views from all areas surrounding the WLC site will fundamentally change as development occurs, but views of major scenic resources (i.e., Mount Russell, the Badlands, and Mystic Lake) may be largely preserved through careful limitations on the height and location of future buildings. The WLCSP outlines how future development will be made visually attractive and, through careful limitations on the height and location of future buildings, views of the surrounding mountains and Mystic Lake can be preserved through mitigation of individual buildings.

Impact Summary: Scenic Vistas. The implementation of the proposed project will obstruct and/or substantially affect scenic views for residents living within, or in the vicinity of, the project, and for travelers on SR-60, Gilman Springs Road, Redlands Boulevard, Theodore Street, and Alessandro Boulevard. Many of the views of the motoring public while on local roadways will fundamentally change instead of views of open agricultural land, these residents and motorists will view new logistics buildings and the associated parking areas, roadways, infrastructure, and landscaping. Therefore, the project will have a significant visual impact. The degree to which these buildings may block views of major scenic resources (i.e., Mount Russell, the Badlands, and Mystic Lake) will depend on the location and heights of buildings. This impact requires mitigation; however, this change in views, while substantial, is anticipated in the City’s General Plan, which allows development within the project area. At present, the General Plan allows development of a mixed-use residential community (i.e., Moreno Highlands Specific Plan), which would mainly be one-story and two-story buildings (approximate maximum height 35 feet). The WLCSP proposes to instead develop the site with logistics warehouse buildings (maximum height 60–80 feet), so this change in itself would represent a significant visual impact. In addition, the eventual change in views from existing (baseline) conditions is substantial and is considered a significant visual impact on scenic vistas.

Project or Specific Plan Design Features. The WLC Specific Plan contains design guidelines for architecture and landscaping within the site, which will guide the design of all project buildings toward attractive and visually appealing treatments. Section 2.0 of the Specific Plan indicates that warehouse uses will occur throughout the site, except for in the 74.3 acres at the southwest corner of the site designated for Open Space (OS). Section 5.0 of the Specific Plan outlines the design standards to be applied to development within the project site, including Site Plan Guidelines (5.2), Architecture (5.3), Landscaping (5.4), and Lighting (5.5).

Specific Plan Section 5.1 indicates the project will utilize “Sustainable Design” to reduce pollution and conserve natural resources by considering renewable energy systems, minimizing the use of potable water, use atriums, skylights and internal courtyards to provide daylighting, orienting buildings to screen loading and service areas, collecting rainwater to irrigate drought-tolerant landscaping, providing landscaped outdoor plazas or entries, screening all truck yards from public view, etc.

Specific Plan Section 5.2 indicates building designs should “employ clean, simple, geometric forms and coordinated massing that produce overall unity, scale, and interest.” They should have appropriate façades, fenestration, glazing materials, roofs, colors, etc. Appropriate building design includes visible vertical support, visible structural base, functional and straightforward elements, columns integrated into the façade, and proper structural scale. The visual examples of what are appropriate and what are not also helps the reader to understand how the future buildings will appear.

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NOTE: The following mitigation measures relative to views have been revised largely in Responses to Comments F-13-6 and F-13-21 in Letter F-13 from Johnson & Sedlack on behalf of the Sierra Club, Moreno Valley Group & Residents for a Livable Moreno Valley, Responses to Comments G-57-13, G-95-6, G-95-9, G-95-20, G-95-21, G-95-41, and related comments by others.

Mitigation Measures. The sizes, heights, and general locations of buildings on the site are limited by the standards and guidelines contained in the Specific Plan. The following mitigation measures are recommended to reduce project impacts related to the potential loss of public viewsheds:

- 4.1.6.1A** Each Plot Plan application for development along the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing or planned residential zoned uses) shall include a minimum 250-foot setback measured from the City/County zoning boundary line and any building or truck parking/access area within the project. The setback area shall include landscaping, berms, and walls to provide visual screening between the new development and existing residential areas upon maturity of the landscaping materials. The existing olive trees along Redlands Blvd. shall remain in place as long as practical to help screen views of the project site. This measure shall be implemented to the satisfaction of the Planning Official.
- 4.1.6.1B** Each Plot Plan application for development adjacent to Redlands Boulevard, Bay Avenue, or Merwin Street, shall include a plot plan, landscaping plan, and visual rendering(s) illustrating the appearance of the proposed development. The renderings shall demonstrate that views of proposed buildings and trucks can be reasonably screened from view from existing residences upon maturity of planned landscaping and to ensure consistency with the General Plan Objective 7.7. “Effective” screening shall mean that no more than the upper quarter (25%) of a building is visible from existing residences, which shall be achieved through a combination of landscaping, berms, fencing, etc. The location and number of view presentations shall be at the discretion of the Planning Division.
- 4.1.6.1C** Prior to the issuance of a certificate of occupancy for buildings adjacent to the western, southwestern, and eastern boundaries of the project (i.e., adjacent to existing residences at the time of application) the screening required in Mitigation Measure 4.1.6.1A shall be installed in substantial conformance with the approved plans to the satisfaction of the Planning Official.
- 4.1.6.1D** Prior to the issuance of permits for any development activity adjacent to Planning Area 30 (74.3 acres in the southwest portion of the Specific Plan), the entirety of Planning Area 30 shall be offered to the State of California for open space purposes. In the event that the State does not accept the dedication, the property shall be offered to Western Riverside County Regional Conservation Authority or an established non-profit land conservancy for open space purposes. In the event that none of these organizations accepts the dedication, the property may be dedicated to a property owners association or may remain in private ownership and may be fenced and access prohibited.

Level of Significance after Mitigation. After implementation of the proposed mitigation measure(s), adverse effects on scenic vistas would remain significant and unavoidable due to the fundamental change in public views for residents within and surrounding the project site, for travelers on SR-60, Gilman Springs Road, Theodore Street, and Redlands Boulevard,

4.1.6.2 Scenic Resources and Scenic Highways

Impact 4.1.6.2: *The proposed project would have a significant impact on the views of scenic resources for motorists traveling on SR-60 and Gilman Springs Road.*

Threshold	Would the proposed project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway and/or local scenic road?
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The California Department of Transportation (Caltrans) Scenic Highway Program does not identify any State-designated scenic highways¹ near the project site². However, the City of Moreno Valley identifies SR-60 and Gilman Springs Road as local scenic roads.³ According to the City's General Plan EIR, major scenic resources within the Moreno Valley study area are visible from SR-60 and Gilman Springs Road, both of which are City-designated local scenic roadways. It should be noted that Moreno Beach Drive, the other City-designated scenic route (per GP policy 7.7.4), is approximately one mile west of the project site. The proposed project would not be visible from Moreno Beach Drive, so it will not be analyzed further in this document. According to the City's General Plan, the built environment is equally important as natural landforms in terms of scenic values (e.g., buildings, landscaping, and signs).

Section 4.1.6.1 of this EIR determined that the proposed project could have a substantial adverse impact on one or more scenic vistas, including views of the Mount Russell Range and the Badlands for both residents and travelers on SR-60 and Gilman Springs Road.

The project is not required to provide a formal Visual Impact Assessment (VIA) to Caltrans since SR-60 is not a state-designated scenic highway; however, a cursory application of typical VIA requirements is useful in evaluating potential visual impacts of the project relative to travelers on SR-60 just north of the site. According to the Caltrans Handbook, a VIA is typically considered for projects that have the potential to change the "visual" environment. The level of assessment for the VIA can range from "no formal analysis" to a "complex analysis" and is determined by many factors such as numbers of viewer groups affected; existence of scenic resources; degree and totality of the proposed changes in the visual environment; local concerns or project controversy; and cumulative impacts along the transportation corridor.

In order to establish the need and level of study for a VIA, a preliminary evaluation is performed to determine if the project will cause any physical changes to the environment. This preliminary evaluation includes activities such as conducting a site visit to inventory the scenic resources of the project site, estimating potential changes to that character, and identifying viewer groups and public concerns or opposition to the proposal.

The following analysis of visual impacts of the project was conducted with the VIA criteria in mind. Even though a Caltrans VIA was not prepared, the following evaluation of potential impacts to visual resources is based on guidance from the following resource documents:

- Federal Highway Administration (FHWA) Technical Advisory T6640.8;
- FHWA Guidance HI-88-054: Visual Impact Assessment for Highway Projects;
- Title 23 U.S.C. 109 (h); and

¹ A State Scenic Highway is defined as any freeway, highway, road, or other public right-of-way, that traverses an area of exceptional scenic quality.

² *Eligible and Officially Designated Routes*, California Department of Transportation Scenic Highway Program, http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm, website accessed April 4, 2012.

³ *Conservation Element, Figure 7-2 Major Scenic Resources*, City of Moreno Valley General Plan, adopted July 11, 2006.

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- FHWA DOT-FH-11-9694: Visual Impact Assessment for Highway Projects, as published by the American Society of Landscape Architects.

Table 4.1.B provides the thresholds for a qualitative analysis as to what would be considered a minor, moderate, or major visual intrusion along scenic highways.

Table 4.1.B: Visual Intrusion Criteria

Type of Intrusion	Characteristics
Minor	Widely dispersed buildings; natural landscape dominates; wide setbacks and buildings screened from roadway; exterior colors and materials are compatible with environment; or buildings have cultural or historical significance.
Moderate	Increased number of buildings, but complementary to the landscape; smaller setbacks and lack of roadway screening; buildings do not degrade or obstruct scenic view.
Major	Dense and continuous development; highly reflective surfaces; buildings poorly maintained; visible blight; development along ridgelines; or buildings degrade or obstruct scenic view.

Source: *Scenic Highway Guidelines*, California Department of Transportation, March 1996; http://www.dot.ca.gov/hq/LandArch/scenic/guidelines/scenic_hwy_guidelines.pdf, site accessed April 27, 2012. Page 23.

The following analysis is generally based on the visual intrusion criteria from the Caltrans Guidelines for the Official Designation of Scenic Highways. These criteria, as identified in Table 4.1.B, provide for a qualitative analysis as to what would be considered a minor, moderate, or major visual intrusion along scenic highways. Existing views for motorists traveling eastbound and westbound on SR-60 consist of agricultural fields in the foreground and midground, and the Mount Russell Range and Badlands in the background. As previously identified in Figures 4.1.4 and 4.1.5, development of the proposed project would significantly alter the existing view by introducing large industrial buildings adjacent to the freeway. Existing eastbound and westbound views on SR-60 and Gilman Springs Road would be fundamentally altered with the future development of the proposed project. Views of the project buildings would occur for up to 112 seconds or almost two minutes when motorists are traveling at normal freeway speeds (approximately 9,000 feet or 1.7 miles @ 55 mph, Redlands Boulevard to Gilman Springs Road). Views would be even longer during rush hour or times of congestion when freeway speeds are below 55 mph and shorter higher freeway speeds.

According to Figure 5-3 in the WLCSP (Building Height Plan, and Figure 3.9 in the Project Description of this EIR), the north, west, and south perimeter portions of the site will have buildings with heights up to 60 feet, and some of the buildings along the eastern perimeter and south of Street C (southeastern portion of the site but not adjacent to the San Jacinto Wildlife Area), would have heights of up to 80 feet. Since the Skechers building (roof height approximately 1,790 feet amsl) is already visible throughout the project site and from off-site areas to the east, south, and southwest, it is likely that most new buildings will be visible from these areas or possibly even farther away, depending on building heights and locations. The use of light colors and reflective surfaces such as glass and polished metal near office entrances and building corners, such as required in the WLC Specific Plan design guidelines, will enhance the visibility of these buildings.

The proposed sound walls and ornamental landscaping would soften the visual impacts of future buildings, but the proposed project would likely result in at least a partial obstruction of a portion of the Mount Russell Range for motorists traveling on SR-60, so the proposed buildings may obstruct the view of a major scenic feature from a City-designated scenic route. The proposed project meets criteria in both the moderate and major visual intrusion categories. Therefore, it is anticipated that the WLC Specific Plan design guidelines may create a major visual intrusion (i.e., significant impact) for motorists traveling on SR-60 and Gilman Springs Road.

General Plan Policies. These anticipated visual changes, while substantial, are generally consistent with the General Plan policies in the Conservation Element regarding visual resources and scenic routes, as outlined in Section 4.1.2.2 and excerpted below:

Objective 7.7 Where practicable, preserve significant visual features, significant views, and vistas.

Policy 7.7.4 Gilman Springs Road, Moreno Beach Drive, and State Route 60 shall be designated as local scenic roads.

Policy 7.7.5 Require development along scenic roadways to be visually attractive and to allow for scenic views of the surrounding mountains and Mystic Lake.

Based on the analysis in the preceding section, the WLCSP can preserve significant visual features, significant views, and vistas if the size and location of buildings developed under the WLCSP can be controlled so as to not substantially block views of Mount Russell, the Badlands, and Mystic Lake. The views from SR-60 and Gilman Springs Road will fundamentally change, but their views of major scenic resources (i.e., Mount Russell, the Badlands, and Mystic Lake) may be preserved through careful limitations on the height and location of future buildings. The WLCSP outlines how future development along SR-60 and Gilman Springs Road will be made visually attractive and can maintain some view corridors of the surrounding mountains and Mystic Lake through careful limitations on the height and location of future buildings. These are considered significant visual impacts on local scenic roads that will require mitigation.

Project or Specific Plan Design Features. As outlined in the previous section, the WLCSP contains architectural and design guidelines that require the construction of attractive warehouse buildings and surrounding grounds. The WLCSP provides examples of building designs, materials, colors, and landscaping that would be allowed (or not allowed) within the Specific Plan. Section 5.0 of the Specific Plan outlines the design standards to be applied to development within the project site, including Site Plan Guidelines (5.2), Architecture (5.3), Landscaping (5.4), and Lighting (5.5).

Specific Plan Section 5.2.3 indicates the project will utilize “Sustainable Design” to reduce pollution and conserve natural resources by considering renewable energy systems, minimizing the use of potable water, use atriums, skylights and internal courtyards to provide daylighting, orienting buildings to screen loading and service areas, collecting rainwater to irrigate drought-tolerant landscaping, providing landscaped outdoor plazas or entries, screening all truck yards from public view, etc.

Specific Plan Section 5.3.4 indicates building designs should employ clean, simple, geometric forms and coordinated massing that produce overall unity, scale, and interest. They should have appropriate façades, fenestration, glazing materials, roofs, colors, etc. Appropriate building design includes visible vertical support, visible structural base, functional and straightforward elements, columns integrated into the façade, and proper structural scale. The visual examples of what are appropriate and what are not also help the reader understand how the future buildings will appear.

However, even with the extensive design features of the Specific Plan, the resulting change in views from SR-60 and Gilman Springs Road will be significant, and mitigation is required.

Mitigation Measures. Construction of future logistics warehousing according to the development standards and design guidelines of the WLC Specific Plan will help soften building façades, and the installation of ornamental landscaping will help buffer the visual appearance of the buildings from SR-60, but the obstruction of local views will still be significant. Implementation of **Mitigation Measures 4.1.6.1A through 4.1.6.1D** will help reduce these impacts, but not to less than significant levels.

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Level of Significance after Mitigation. Even with implementation of **Mitigation Measures 4.1.6.1A** through **4.1.6.1D**, the loss of views from SR-60 will remain a significant and unavoidable visual impact, but one that is nonetheless consistent with the City’s applicable General Plan policies.

4.1.6.3 Existing Visual Character and Surroundings

Impact 4.1.6.3: *The proposed project will significantly degrade the existing visual character of the project site from open space to an urbanized setting by introducing large high cube logistics warehouse buildings.*

Threshold	Would the proposed project substantially degrade the existing visual character or quality of the site and its surroundings?
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NOTE: The following changes have been made due to revisions made to the Specific Plan project size.

Visual impacts associated with changes to the general character of the project site (e.g., loss of open space), the components of the visual settings (e.g., landscaping and architectural elements), and the visual compatibility between proposed site uses and adjacent land uses would occur. The significance of visual impacts is inherently subjective as individuals respond differently to changes in the visual characteristics of an area. The project site is currently undeveloped with existing agricultural fields throughout the site. Development of the proposed industrial uses on the project site would include approximately 40.6 million square feet of warehouse distribution uses with associated parking areas, ornamental landscaping, and roadway and infrastructure on approximately 2,635 acres. Maximum building heights will range from 60 to 80 feet depending on location within the project and will substantially change the views of both nearby residents and motorists on adjacent roadways.

The proposed project would also change views for travelers on the adjacent portion of SR-60 and Gilman Springs Road by introducing large industrial buildings in place of agricultural vacant land. The proposed buildings closest to the freeway would most likely have an average height of approximately 55 to 60 feet, although the maximum height may be increased by up to 10 percent for portions of some buildings if necessary to accommodate interior facilities (i.e., elevator shafts) and architectural design elements, which would exceed the existing height of the adjacent freeway by approximately 30 feet. Such changes may be approved through the administrative variance process which provides for consideration of alternative standards, such as greater building heights, up to a maximum modification of 10%. The Administrative Variance process is provided in Section 11.3.3.1 of the Specific Plan. Development of the proposed project would substantially and fundamentally change the existing character of the project site from open space to an urbanized setting with many large logistics buildings. The change in the character of the site would constitute a significant alteration of the existing visual character of the WLC project site, regardless of the architectural treatment and landscaping of the site. These impacts would be especially significant for residents of the existing residences on the project site, depending on the timing, location, and size of development in the future.

The proposed WLCSP includes a variety of architectural elements including façade accents such as corner treatments and roof trim. The project also provides variation in wall planes that serve to avoid an institutional appearance and break up the bulk of the buildings. This variation would create shadow lines at various times of the day.

The proposed warehouse buildings and ornamental landscaping would replace the widespread agricultural fields and scattered landscaping plants on the site. Landscaping would be provided in accordance with the Specific Plan Landscaping Guidelines.

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The City recently approved an amendment to the Municipal Code requiring a 250-foot setback between industrial uses (i.e., the closest building and/or parking areas) and residential uses (i.e., Municipal Code Section 9.06). The Specific Plan design guidelines require specific setback distances. These required setbacks are shown in Section 4.2, *Offsite Landscaping*, of the Specific Plan. This section also includes a number of line-of-sight cross-sections and landscaping plans for the setbacks along the west side of the project. These setbacks provide a minimum 250 feet from existing residences to new proposed buildings or truck activity areas, consistent with the intent of Municipal Code Section 9.06.

In summary, the proposed setbacks, landscaping, berms, and walls outlined in the Specific Plan appear sufficient to provide adequate visual screening between proposed warehouse buildings and the existing residential uses. However, mitigation is required to ensure the actual design and appearance of setback areas will effectively screen new development from existing residences and neighboring roadways.

Consistency with General Plan Policies. Sections 4.1.6.1 and 4.1.6.2 evaluated the WLC project relative to the General Plan objectives and policies in the Conservation Element. Table 4.1.C compares the WLCSP project to the General Plan objectives and policies in the Community Development Element:

Table 4.1.C: WLCSP Consistency with Community Development Element

General Plan Objective or Policy	Evaluation of WLCSP Consistency
Objective 2.5: Promote a mix of industrial uses which provide a sound and diversified economic base and ample employment opportunities for the citizens of Moreno Valley with the establishment of industrial activities that have good access to the regional transportation system, accommodate the personal needs of workers and business visitors, and which meets the service needs of local businesses.	Consistent. The WLCSP provides high cube logistics industrial uses near SR-60.
Policy 2.5.1: The primary purpose of areas designated Business Park/Industrial is to provide for manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities. 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 FAR should be significantly less.	Consistent. The WLCSP provides warehousing that is at FAR 0.5, which is much less than the maximum allowed.
Policy 2.5.2: Locate manufacturing and industrial uses to avoid adverse impacts on surrounding land uses.	Consistent. The WLCSP provides setbacks and visual screening from neighboring residential and open space uses, and precludes project traffic through these areas as well.
Policy 2.5.3: Screen manufacturing and industrial uses where necessary to reduce glare, noise, dust, vibrations, and unsightly views.	Consistent. The WLCSP shows that the proposed warehouse buildings will be set back and screened from existing off-site residential uses.
Policy 2.5.4: Design industrial developments to discourage access through residential areas.	Consistent. WLCSP precludes project truck traffic through residential areas to the west and southwest, as outlined in the WLCSP circulation plan (see DEIR Figure 3.10).
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	Consistent. The WLCSP provides high quality architectural and landscaping themes for the proposed buildings and grounds within the project.

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Table 4.1.C: WLCSP Consistency with Community Development Element

General Plan Objective or Policy	Evaluation of WLCSP Consistency
exemplary design.	
<p>Policy 2.10.1: Encourage a design theme for each new development that is compatible with surrounding existing and planned developments.</p>	<p><i>Note: The following changes have been made due to the revisions of the Specific Plan project size.</i></p> <p>Consistent. The WLCSP encompasses 2,610 acres in the last remaining large vacant land in the City. It will create a new logistics center with unique design themes. This development will be set back and visually screened to make it compatible with other development within the project and screened from adjacent residential uses.</p>
<p>Policy 2.10.2: Screen trash storage and loading areas, ground and roof-mounted mechanical equipment, and outdoor storage areas from public view as appropriate.</p>	<p>Consistent. The WLCSP provides design and development guidelines that achieve these requirements.</p>
<p>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 façades that are aesthetically pleasing.</p>	<p>Consistent. The WLCSP contains detailed development and architectural design guidelines intended to provide high quality logistics warehousing development on the project site. The WLCSP design guidelines include secondary accents, roofline variations, setbacks, and façade treatments, consistent with this policy.</p>
<p>Policy 2.10.4: Landscaping and open spaces should be provided as an integral part of project design to enhance building design, public views, and interior spaces, provide buffers and transitions as needed, and facilitate energy and resource conservation.</p>	<p>Consistent. The WLCSP emphasizes landscaping and energy conservation or sustainability concepts as an integral part of project design. The entire southern boundary and the southwest corner of the project will be permanent open space.</p>
<p>Policy 2.10.5: Development projects adjacent to freeways shall provide landscaped buffer strips along the ultimate freeway right-of-way.</p>	<p>Consistent. The WLCSP provides extensive landscaping along the south side of SR-60.</p>
<p>Policy 2.10.6: Buildings should be designed with a plan for adequate signage. Signs should be highly compatible with the building and site design relative to size, color, material, and placement.</p>	<p>Consistent. The WLCSP includes a section on signage to provide a comprehensive plan for signage throughout the project area.</p>
<p>Policy 2.10.7: On-site lighting should not cause nuisance levels or glare on adjacent properties.</p>	<p>Consistent with Mitigation. The WLCSP contains lighting guidelines for future development, but ambient light level impacts will need to be calculated and, if necessary, mitigated through the City's site plan review process for each specific building proposed.</p>
<p>Policy 2.10.8: Lighting should improve the visual identification of structures.</p>	<p>Consistent. The WLCSP includes a section on signage with lighting for a comprehensive plan throughout the project area.</p>
<p>Policy 2.10.9: Fences and walls should incorporate landscape elements and changes in materials or textures to deter graffiti and add visual interest.</p>	<p>Consistent. The WLCSP design guidelines require that fences and walls incorporate landscaping and materials designed to reduce graffiti.</p>
<p>Policy 2.10.10: Minimize the use and visibility of reverse frontage walls along streets and freeways by treatments such as landscaping, berming, and "side-on" cul-de-sacs.</p>	<p>Consistent. The WLCSP design guidelines do not allow reverse frontage walls. The SR-60 freeway frontage along the north side of the project will be fully landscaped.</p>

Table 4.1.C: WLCSP Consistency with Community Development Element

General Plan Objective or Policy	Evaluation of WLCSP Consistency
Policy 2.10.11: Screen and buffer non-residential projects from adjacent residential property and other sensitive land uses when necessary to minimize noise, glare, and other adverse effects on adjacent uses.	Consistent. The WLCSP provides a physical and visual setback to screen new warehouse buildings from existing residential buildings.
Policy 2.10.12: Screen parking areas from streets to the extent consistent with surveillance needs (e.g., mounding, landscaping, low profile walls, and/or grade separations).	Consistent. The WLCSP requires parking areas to be screened consistent with surveillance needs.
Policy 2.10.13: Provide landscaping in automobile parking areas to reduce solar heat and glare.	Consistent. The WLCSP landscaping plan provides for planting vegetation in parking areas that will help provide shade and reduce glare.

Due to the size and nature of the project, development of the WLCSP will eventually degrade the existing visual character of the area to a significant degree.

Project or Specific Plan Design Features. As outlined in previous sections, the WLCSP contains architectural and design guidelines that will encourage the construction of attractive warehouse buildings and surrounding grounds. The WLCSP provides examples of building designs, materials, colors, and landscaping that would be allowed (or not allowed) within the Specific Plan.

NOTE: The following mitigation measure regarding views has been changed in Response to Comment F-8-3 in Letter F-8 from Shute Mihaly & Weinberger LLP, Comment G-33-6 in Letter G-33 from Tom Behrens, Responses to Comments G-95-21, G-96-4, and related comments from others.

Mitigation Measures. Incorporation of the proposed design guidelines, landscaping guidelines, and **Mitigation Measure 4.1.6.1A** will help soften the visual appearance of the buildings from SR-60, Gilman Springs Road, and nearby residences. However, the fundamental change in visual character of the area will still be significant. Even with compliance with the City’s General Plan and Municipal Code development guidelines for industrial development, including the 250-foot setback between industrial and residential land uses, the anticipated fundamental change in views expected in this area will be significant. Due to the heights and mass of buildings needed to accommodate the proposed land uses, no feasible mitigation is available that would reduce these potential impacts to less than significant levels. However, the following measure will help reduce the project’s visual impacts on adjacent residential development:

4.1.6.3A Each Plot Plan application for development shall include plans and visual rendering(s) illustrating any changes in views of Mount Russell and/or the Badlands, for travelers along SR-60, as determined necessary by the Planning Official. The plans and renderings shall illustrate typical views based on proposed project plans, with the location and number of view presentations to be determined by the Planning Official. These views shall be simulated from a height of six feet from the edge of the roadway travel lane closest to the visual resource. The renderings must demonstrate that the development will preserve at least the upper two thirds (67%) of the vertical view of Mt. Russell from SR-60.

Level of Significance after Mitigation. Even with implementation of **Mitigation Measures 4.1.6.1A** through **4.1.6.1D** and **4.1.6.3A** the substantial change in visual character of the project site and surrounding area from development of the proposed project will cause aesthetic impacts to remain significant and unavoidable.

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4.1.6.4 Light and Glare

Impact 4.1.6.4: *The proposed project will introduce a significant new source of light and glare into the project area.*

Threshold	Would the proposed project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?
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Currently, there are few sources of light or glare on the project site and there is little or no impact on adjacent properties. Existing sources of light and glare in the surrounding area include the new Skechers building to the northwest of the project site, SR-60 traffic, streetlights, exterior lighting from the nearby residences, and vehicle headlights from motorists on Gilman Springs Road, Redlands Boulevard, Theodore Street, and Alessandro Boulevard.

Development of the project site would introduce numerous new sources of light and glare into the area in the form of street lighting, parking lots, and security lighting for the buildings and nighttime traffic.

The WLCSP requires that all site lighting be oriented downward so as to not project direct light rays upward into the sky or onto adjacent properties. The development of the project will cause a significant increase in light and glare in the area. This new lighting will incrementally affect nighttime conditions in the area.

The WLC Specific Plan requires energy-efficient lighting in most cases, but does allow mercury or incandescent lighting under some conditions (i.e., limited walkway or entryway applications). In addition, the lighting guidelines of the Specific Plan require high-pressure sodium or light-emitting diodes (LEDs) that produce a very “white” color of light, which allows for accurate color rendition (e.g., compared to low-pressure sodium, which produces an orange-tinged light that skews color rendition).

Exterior surfaces of the concrete tilt-up structure would be finished with a combination of architectural coatings, trim, and/or other building materials such as concrete and brushed metal. The proposed project will incrementally increase the amount of daytime glare in the project area by introducing windows and metal fixtures into the area. All development in the City, which includes light generated from warehouse buildings and parking lots, is required to adhere to lighting requirements contained in the City’s Municipal Code (Section 9.08.100 *Lighting*), which states that any outdoor lighting associated with nonresidential uses shall be shielded and directed away from the surrounding residential uses. Such lighting shall not exceed one-quarter (0.25) foot-candle at property lines and shall not blink, flash, oscillate, or be of unusually high intensity or brightness. Lighting in parking areas and drive aisles must be at least 1.0 foot candle and cannot exceed a maximum of 8.0 foot candles.

Adherence to the City’s Zoning Code would help reduce potential building or parking lighting impacts, but the location of industrial uses adjacent to residential uses would not reduce potential lighting impacts on adjacent residential uses to less than significant levels.

The WLC Specific Plan also allows for the installation of roof-mounted solar panels on future warehouse buildings and these panels may produce unintended glare to the southeast, south, and southwest of the site, depending on the angle of the sun, the number and location of panels, and the degree to which the building parapet blocks views of the panels from surrounding land uses. Without additional information, this impact is determined to be potentially significant and requires mitigation.

Consistency with General Plan Policies. The only General Plan policy that specifically addresses lighting is Policy 2.10.7, which states, “On-site lighting should not cause nuisance levels or glare on adjacent properties.” Due to the amount of new development proposed, the project’s impact relative

to nuisance lighting and glare is potentially significant, even with implementation of the development and lighting design guidelines in the WLCSP. Therefore, mitigation is required.

Consistency with Municipal Code Requirements. The recent changes to the Municipal Code from Ordinance 851 will help control lighting impacts of the proposed project relative to adjacent residential properties. All development within the Specific Plan adjacent to residences along Redlands Boulevard, Bay Avenue, and Merwin Street will be required to demonstrate compliance with the off-site light spillage requirements of Section 9.08.100 of the Municipal Code.

Project or Specific Plan Design Features. The WLCSP contains lighting standards and design guidelines that will require the minimal use of lighting for building visibility and safety at night. The WLCSP provides examples of lighting that would be allowed (or not allowed) within the Specific Plan. However, Section 5.5.1 of the Specific Plan states that, "... lighting in the vicinity of the San Jacinto Wildlife Area shall be designed to confine all direct light rays to the project site and preclude the visibility of direct light rays from the wildlife area" (WLCSP page 5-47).

In addition, Section 5.5 of the Specific Plan includes the following guidelines regarding lighting:

- 5.5.2.2 All exterior on-site lighting must be shielded and confined within site boundaries. No direct rays or glare are permitted to shine onto public streets or adjacent lots.
- 5.5.2.3 Lighting fixtures are to be of clean, contemporary design.
- 5.5.2.4 Lighting must meet all requirements of the City of Moreno Valley.
- 5.5.2.5 Tilted wall fixtures (i.e., light fixtures which are not 90 degrees from vertical) are not permitted. Lights mounted to the roof parapet are not permitted. Wall-mounted light fixtures used to illuminate vehicular parking lots are not permitted.
- 5.5.2.6 Wall-mounted utility lights that cause off-site glare are not permitted. "Shoebox" lights are preferred.

NOTE: The following changes to mitigation for lighting impacts from solar panels have been made in Response to Comment G-95-42 in Letter G-95 from Thomas Thornsley.

Mitigation Measures. Even with compliance with the City's General Plan, Municipal Code, and the Specific Plan's development guidelines for lighting and building materials, the anticipated lighting and glare changes in this area will be potentially significant, especially adjacent to the San Jacinto Wildlife Area. Implementation of **Mitigation Measures 4.1.6.1A** through **4.1.6.1B** will help reduce related visual impacts, while **Mitigation Measures 4.1.6.4A** and **4.1.6.4B**, below, will help reduce light and glare associated with the new buildings near the SJWA. The project will also have to comply with the lighting requirements of City Municipal Code.

In addition, the following measures are recommended to help ensure that potential lighting impacts of the project will remain at less than significant levels:

- 4.1.6.4A** Each Plot Plan application for development adjacent to residential development shall include a photometric plot of all proposed exterior lighting demonstrating that the project is consistent with the requirements of Section 9.08.100 of the City Municipal Code. The lighting study shall indicate the expected increase in light levels at the property lines of

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adjacent residential uses. The study shall demonstrate that the proposed lighting fixtures and/or visual screening meet or exceed City standards regarding light impacts.

- 4.1.6.4B** Each Plot Plan application for development shall include an analysis of all proposed solar panels demonstrating that glare from panels will not negatively affect adjacent residential uses or negatively affect motorists along perimeter roadways. Design details to meet these requirements shall be implemented to the satisfaction of the Planning Official.

Level of Significance after Mitigation. Light and glare impacts of the proposed project can be reduced to less than significant levels by compliance with the lighting requirements of the City Municipal Code and implementation of **Mitigation Measures 4.1.6.4A** and **4.1.6.4B**.

4.1.7 Cumulative Impacts

Significant Cumulative Impact: The proposed project, in combination with other projects in the eastern portion of the City and along SR-60 and Gilman Springs Road, would have a cumulatively significant and unavoidable impact related to views, scenic resources, night lighting, and glare in this portion of the City.

The development of the proposed project would partially obstruct views of surrounding mountain vistas from various vantage points in and around the project area. Partial view opportunities would continue to be available over future buildings, along roadways, between development areas, etc. Development of lands within the City, particularly along SR-60, would result in the cumulative conversion from open space to urbanized land uses. The proposed project would continue the development of logistics uses along the south side of SR-60 east of the City's Auto Center. The proposed project, in conjunction with other cumulative projects, would be developed in a manner consistent with existing development trends in the City. Since other projects in the area will include similar distribution uses, it can be anticipated that such uses would have a similar design and massing as the proposed project. Since the proposed project would affect views of the surrounding mountains, it is reasonable to conclude that similar warehouse distribution uses would also obstruct views of the surrounding mountains. However, the analysis in Section 4.1.6.1 determined visual impacts, though substantial, were consistent with applicable General Plan policies (Policy 7.7.4 in the Conservation Element). Based on this analysis, the proposed project, in combination with other cumulative projects in the surrounding area, will have a cumulatively significant and unavoidable impact related to aesthetics (i.e., views, scenic resources, and lighting) in this portion of the City.

The proposed, existing, and future development within the planning area will increase the amount of light and glare in the area. The cumulative lighting-related impacts of this new development would be reduced through the adherence to applicable City Municipal Code lighting standards. However, this project, in combination with the Auto Center and other approved high cube logistics developments in this portion of the City, will result in cumulatively considerable light and glare impacts, and the proposed project will make a significant contribution to that cumulative impact.

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NOTE TO READERS. *This section has been revised based on responses to comments on the Programmatic DEIR regarding calculation of and mitigation for loss of agricultural land, changes to the WLC Specific Plan, and changes to related technical studies.*

4.2 AGRICULTURAL AND FORESTRY RESOURCES

This section discusses possible agricultural and forestry resource impacts attributable to the proposed project. It describes existing agricultural resources and State farmland classifications for the project site. This section focuses on applicable State, regional, and local policies regarding agricultural resources and the conversion of farmland to non-agricultural uses.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The analysis contained in this section is based on the following reference documents:

- *Agricultural Mitigation Bank Memorandum*, County of Riverside Transportation and Land Management Agency, October 2, 2003.
- *Agricultural Resources Assessment for the World Logistics Center Specific Plan Draft Environmental Impact Report*, Parsons Brinckerhoff, original dated February 12, 2012, revised December 2013.
- *California LESA Model*, Agribusiness, Natural Resources & Energy Practice Group of Cushman & Wakefield Western, Inc. (C&WW). December 20, 2013.

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- *A Guide to the Farmland Mapping and Monitoring Program*, California Department of Conservation, Division of Land Resources Protection, 2004 Edition.
- *California Land Evaluation and Site Assessment Model, Instruction Manual*, California Department of Conservation, Office of Land Conservation, 1997.
- *Conservation Element, City of Moreno Valley General Plan*, adopted July 11, 2006.
- Google Maps Street View, imagery dated 2007.
- *Moreno Valley General Plan Environmental Impact Report*, SCH#200091075, certified July 2006.
- *Moreno Valley Municipal Code*, Chapter 9.06, current through February 2012.
- Riverside County Integrated Project website, <http://www.rcip.org/>, accessed April 5, 2012.
- *Riverside County Land Use Conversions, 1998–2000, 2000–2002, 2002–2004, 2004–2006*, California Department of Conservation, Division of Land Resources Protection.
- *Riverside County 2010 Agricultural Production Report*, Riverside County Farm Bureau, 2010.
- *Soil Survey Western Riverside County Area California*, United States Department of Agriculture, November 1971.
- *An Agriculture Industry Analysis of the Inland Empire*, Andrew Chang & Company, LLC. March 12, 2012 (DEIR Appendix C).

The California Land Evaluation and Site Assessment (LESA) Model worksheets prepared for the project are included in Appendix C to this EIR (*Agricultural Resources Assessment for the World Logistics Center Specific Plan Draft Environmental Impact Report*, Parsons Brinckerhoff, original dated February 2012, revised September 2014).

4.2.1 Existing Setting

Most of the land within the project area has been utilized for agricultural purposes since the late 1880s. The area has a history of citrus production and dryland farming incorporating various agricultural activities such as frequent disking, infrequent pesticide application, and very limited irrigation. Due to a variety of local and regional economic factors, agricultural production is no longer a principal characteristic of the Moreno Valley economy.¹

NOTE: The following changes have been made due to revision to the Specific Plan project size.

Based on the project biology study (MBA 2014) and the review of recent aerial photographs, currently approximately 2,452 acres or 94 percent of the 2,610-acre Specific Plan area is currently dry farmed, mainly with winter wheat. The remaining acreage of the Specific Plan area contains rural residences and related building/uses, and disturbed native vegetation in the northeast and southwest portions of the site.

Approximately 897 acres or 81 percent of the 1,104-acre open space properties that are owned by the State and public utility companies and located south of the Specific Plan site are in active agriculture; they are also being dry farmed primarily with winter wheat. The remaining land in this area includes disturbed native vegetation associated with Mystic Lake and public facilities, such as the two natural gas facilities.

¹ Conservation Element, City of Moreno Valley General Plan.

Adjacent to the project area, suburban residential uses are located to the west, open space and scattered rural residential uses are located to the east, and State-owned open space properties, such as the Lake Perris Recreation Area and the San Jacinto Wildlife Area, are located to the southwest and south, respectively.

4.2.1.1 State Designated Farmland

The California Government Code (Section 65570) requires the collection and reporting of agricultural land use acreage and conversion by June 30 of each even-numbered year. Utilizing data from the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey and current land use information, the California Department of Conservation (DOC), the Farmland Mapping and Monitoring Program (FMMP)¹ compiles important farmland maps for each county within the State. Maps and statistics are produced biannually using a process that integrates aerial photo interpretation, field mapping, a computerized mapping system, and public review. These maps delineate land use in eight mapping categories (and one overlay category) and represent an inventory of agricultural soil resources within Riverside County (see Figure 4.2.1). The categories of land shown on these maps are listed below.

- **Prime Farmland:** Land that has the best combination of physical and chemical characteristics for the production of crops. It has the soil quality, growing season, and moisture to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods.
- **Farmland of Statewide Importance:** Land that is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store moisture.
- **Unique Farmland:** Land of lesser-quality soils used to produce specific high economic value crops. It has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained high quality or high yields of a specific crop when treated and managed according to current farming methods. It is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Examples of Unique Farmland crops include oranges, olives, avocados, rice, grapes, and cut flowers.
- **Farmland of Local Importance:** Land of importance to the local agricultural economy, as determined by each county's board of supervisors and local advisory committees, i.e., dairies, dry land farming, aquaculture, and uncultivated areas with soils qualifying for Prime Farmland and Farmland of Statewide Importance.

Farmland of Local Importance in Riverside County, including the City of Moreno Valley, is defined as:

- Lands with soils that would be classified as Prime and Statewide Farmland but lack available irrigation water.
- Lands planted with dry land crops of barley, oats, and wheat.
- Lands producing major crops for Riverside County but that are not listed as Unique crops. These crops are identified as returning one million or more dollars on the 1980 Riverside County Agriculture Crop Report. Crops identified are permanent pasture (irrigated), summer squash, okra, eggplant, radishes, and watermelons.
- Dairylands, including corrals, pasture, milking facilities, hay and manure storage areas if accompanied with permanent pasture, or hayland of 10 acres or more.

¹ A Guide to the Farmland Mapping and Monitoring Program, California Department of Conservation, Division of Land Resources Protection, 2004 Edition.

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- Lands identified by city or county ordinance as Agricultural Zones or Contracts, which includes Riverside City “Proposition R” lands.
- Lands planted with jojoba, which are under cultivation and are of producing age.
- **Grazing Land:** Land on which the existing vegetation, whether grown naturally or through management, is suitable for grazing or browsing of livestock.
- **Urban and Built-up Land:** Land used for residential, industrial, commercial, construction, institutional, and public administrative purposes such as railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. Highways, railroads, and other transportation facilities also are included in this category.
- **Other Land:** Land not included in any of the other mapping categories. Common examples include low-density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres.
- **Water:** Water areas with an extent of at least 40 acres.
- **Land Committed to Nonagricultural Use:** This optional designation is an overlay to the standard farmland categories and represents existing farmland and grazing land and vacant areas that have a permanent commitment for development. Examples of Land Committed to Nonagricultural Use would include an area undergoing permanent infrastructure installation or for which bonds or assessments have been issued for public utilities. Such lands represent planning areas where there are commitments for future nonagricultural developments that are not reversible by a simple majority vote by a city council or board of supervisors.

Figure 4.2.2 details farmland designations on the project area. Approximately 2,201 acres, or 59 percent of the 3,714-acre project area, are designated as Farmland of Local Importance. Approximately 25 acres at the southeast corner of Theodore and Eucalyptus Streets are designated Unique Farmland. Imagery dated 2007 shows fallow fields with ruderal vegetation in this area, although some plowing appears to have occurred and several greenhouses stood on the site at that time.¹ Approximately 400 acres located in several areas of the project area are designated X (Other Land) with the largest acreages in the northeast corner, southwest, and south central portions of the project area. Although there are seven scattered rural residences on the project site, a “worst-case” assumption is that 2,200 acres of the WLC project site are considered Farmland of Local Importance with 25 acres classified as Unique Farmland by the State.

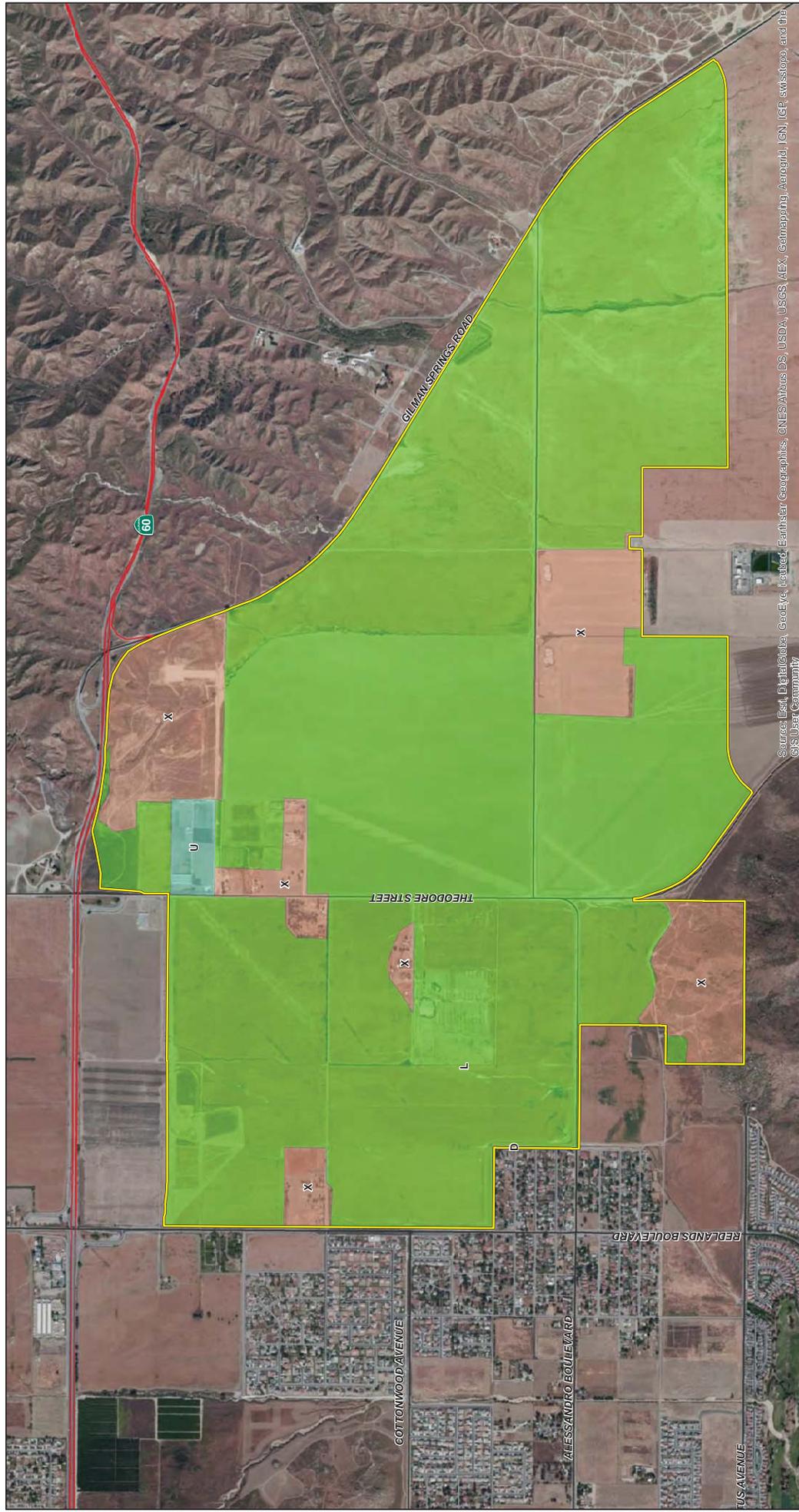
4.2.1.2 California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, also referred to as the Williamson Act, is a non-mandated State program administered by counties and cities for the preservation of agricultural land. This program enables local governments to enter into contracts with private landowners to restrict specific parcels of land to agricultural or related open space use. In return, landowners receive much lower property tax assessments than normal because the assessments are based upon farming and open space uses rather than full market value.

Participation in the program is voluntary on the part of both landowners and local governments, and it is implemented through the establishment of Agricultural Preserves and the execution of Williamson Act contracts. Individual property owners enter into a contract that restricts or prohibits development

¹ Google Maps Street View, dated 2007, viewed April 3, 2012.

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LSA **FIGURE 4.2.2**

- Farmland**
- Project Boundary
 - D - Urban and Built-Up Land
 - L - Farmland of Local Importance
 - U - Unique Farmland
 - X - Other Land

SOURCE: ESRI, World Imagery, 2010; Department of Conservation, Farmland Mapping & Monitoring Program (FMMP), 2010.
 I:\HFV120\Reports\EIR\fig4-2.2_Farmland.mxd (1/30/2014)

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Geomapping, AeroGRID, IGN, IGP, swisstopo, and the
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of their property to non-agricultural uses during the term of the contract in return for lower property taxes. Initially signed for a minimum ten-year period, the contracts are automatically renewed each year for a successive minimum ten-year period unless a notice of non-renewal is filed, or a contract cancellation is approved by the local government.

The nearest parcel that is under Williamson Act contract is approximately 1.5 miles to the southeast of the project site just west of Gilman Springs Road (see Figure 4.2.3). This property is outside of Moreno Valley city limits but within the city's sphere of influence. There are no Williamson Act Conservation contracts¹ within the project area.

4.2.1.3 General Plan, Specific Plan, and Zoning Designations

General Plan. The City's 2006 General Plan Land Use Element has no "agricultural" land use designation.² The EIR accompanying the City's 2006 General Plan determined that the conversion of agricultural land to nonagricultural uses throughout the City represented a significant cumulative impact. As the transition from agricultural to urban and suburban uses continues, the extent to which agriculture and supporting economic activities contribute to the economic base of the City is reduced. In its adoption of the 2006 General Plan, the City recognized that these losses were offset by the economic activities and social benefits that typically accompany urban development. In connection with the City's conclusion that a significant cumulative impact would result from implementation of the General Plan, the City adopted findings and facts and a Statement of Overriding Considerations indicating that social and economic factors outweighed the significant cumulative impacts associated with conversion of agricultural land to non-agricultural use.

Most of the project area is within the current Moreno Highlands Specific Plan and is designated for a mix of Business Park, Open Space, Residential, Commercial, Mixed Use, and Public Facilities land uses (see Section 4.10, *Land Use and Planning*). The land uses proposed in the WLCSP are Logistics Development (LD), Light Logistics (LL), and Open Space (OS).

4.2.1.4 NOP/Scoping Comments

During the NOP/scoping process, some local residents expressed concern over the loss of agricultural land on the project site.

4.2.2 Existing Policies and Regulations

4.2.2.1 City of Moreno Valley General Plan Policies

The City of Moreno Valley's General Plan does not designate any land for agricultural production or preservation, but growing crops is permitted in all of the City's zoning categories. Where practical, the City encourages incorporation of crops, such as existing tree groves, into the design of proposed development projects allowing continuation of the agricultural character of the area as well as providing a buffer between different types of land uses.

The following City General Plan goals and policies pertain to and are applicable to the proposed project.

¹ Department of Conservation, FMMP, 2008.

² City of Moreno Valley General Plan, adopted July 2006.

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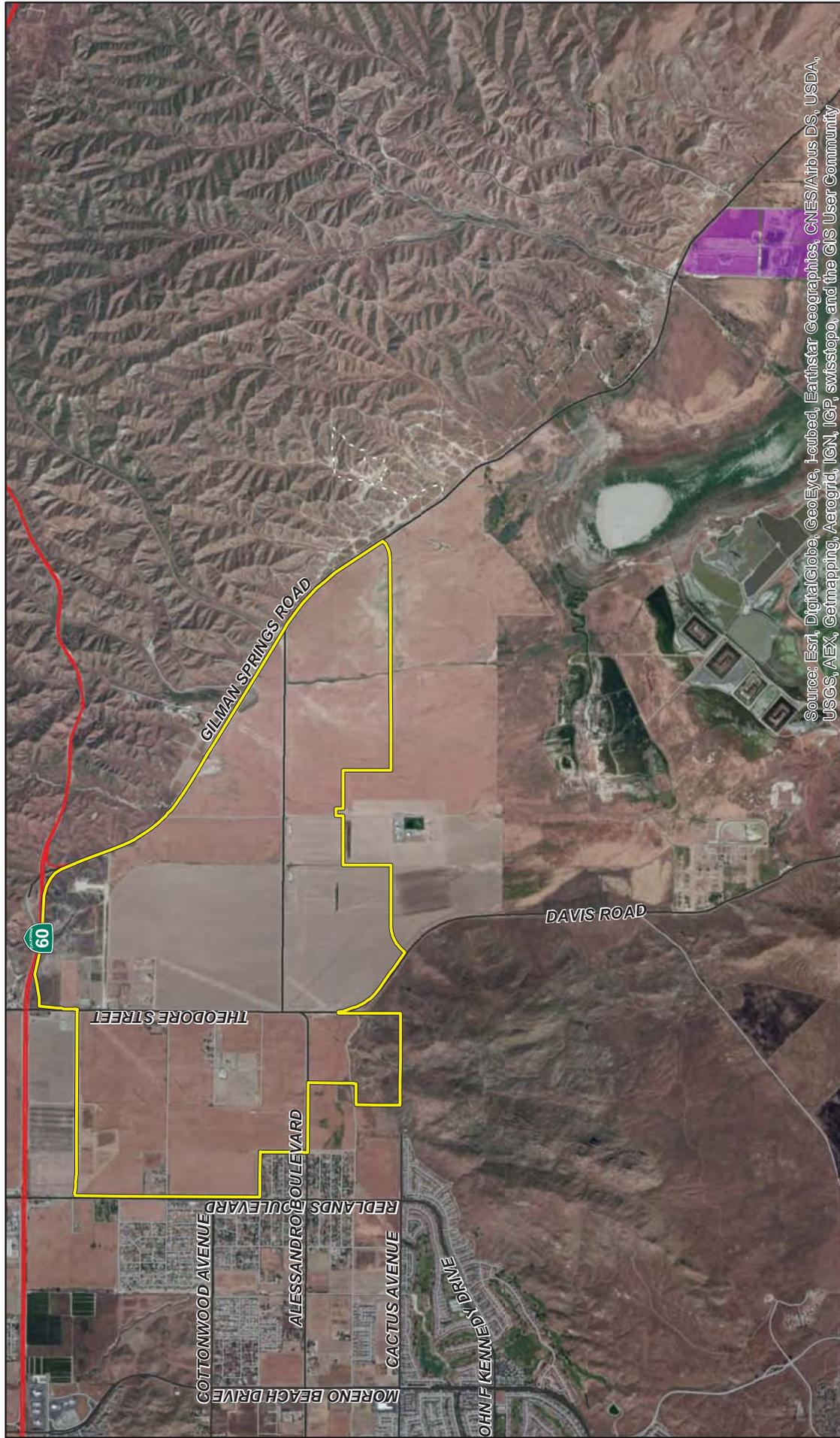


FIGURE 4.2.3

LSA





 0 2,000 4,000
 FEET

 Project Boundary
 Williamson Act Land

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9.1 Ultimate Goals

- VIII. Recognize the need to conserve natural resources while accommodating growth and development.

9.4.2 Parks, Recreation, and Open Space Element Objectives and Policies

- Objective 4.1 Retain agricultural open space as long as agricultural activities can be economically conducted, and are desired by agricultural interests, and provide for an orderly transition of agricultural lands to other urban and rural uses.

4.2.3 Thresholds of Significance

Appendix G of the *CEQA Guidelines* recognizes the following significance thresholds related to agricultural resources. Based on these significance thresholds, potential impacts to agricultural resources could be considered significant if the proposed project would:

- Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]);
- Result in the loss of forest land or conversion of forest land to non-forest use;
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use; and/or
- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use.

4.2.4 Methodology

The methodological analysis underlying this section of the EIR consists of the following:

- First, analyze the FMMP data to determine if portions of the 3,714-acre project area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.
- Second, evaluate the current General Plan land use designations, Specific Plan proposal, and zoning applicable to the site to determine the existence of any conflicts between the project and any potential existing agricultural General Plan and zoning designations applicable to the site.
- Finally, use the California Land Evaluation and Site Assessment (LESA) model, developed by the State Department of Conservation, as a guide to quantify any potential impacts the proposed project may have on agricultural resources. Utilization of the LESA model is currently considered to be the most reliable method by which to determine a project's potential impacts on agricultural resources.

In the late 1980s and the early 1990s, the DOC and the State Legislature began exploring ways by which local agencies could analyze the specific impacts of local projects related to the conversion of farmland in a manner that was consistent throughout the State. At that time, reference to the FMMP maps was the only widely utilized methodological approach to analyzing conversion impacts. Oftentimes, the FMMP maps were outdated and/or did not contain specific data on local conditions that could better assess whether local land contains viable farmland. Federal and State agencies were and are cognizant of the fact that determining the true significance of agricultural conversions is

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a function of understanding the specific characteristics affecting a particular site proposed for conversion. In order to create a more site-specific methodological approach to assessing agricultural impacts, following the preparation of several State and Federal studies, the DOC developed the LESA model as an optional method by which local agencies could assess the impacts of land conversion on agricultural resources. (See, e.g., Stats. 1993, Ch. 812; Pub. Res. Code § 21095; California Agricultural Land Evaluation and Site Assessment Model, Instruction Manual, 1987.) Because of its use of localized input factors, the LESA model is generally recognized as the preferred methodological tool to assess the significance of a proposed project's impacts on agricultural resources.

4.2.5 Less than Significant Impacts

The following potential impacts were determined to be less than significant. In each of the following issues, either no impact would occur or adherence to established regulations, standards, and policies would reduce potential impacts to a less than significant level. In either instance, no mitigation would be required.

4.2.5.1 Forest Land Zoning

Threshold	Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
-----------	---

According to the California Department of Forestry and Fire Protection, there are no areas designated as forest land or timberland on the project site. Therefore, no significant impacts would occur from the implementation of the project.

4.2.5.2 Loss or Conversion of Forest Land

Threshold	Would the project result in the loss of forest land or conversion of forest land to non-forest use?
-----------	---

There are no areas of forest lands on the project site. Therefore, no significant impacts would occur from the implementation of the project.

4.2.5.3 Existing Zoning and Williamson Act

Threshold	Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?
-----------	--

NOTE: The following changes have been made due to revision to the Specific Plan project size.

While some portions of the 3,714-acre project site are currently used for agriculture, there are no Williamson Act contracts (see previously referenced Figure 4.2.3) on either the project site or any adjacent properties. Because the project would not conflict with any Williamson Act contracts, the impacts related to this issue would be less than significant and no mitigation is required.

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NOTE: The following changes have been made due to revision to the Specific Plan project size.

Approximately 25 acres of the project site are designated Unique Farmland. Under the proposed Specific Plan, this land will eventually be converted to non-agricultural use, which would result in a significant and unavoidable impact relative to “designated” farmland conversion. In addition, the project would result in the conversion of 2,585 acres of land designated as Farmland of Local Significance within the Specific Plan area (total 2,610 acres total minus 25 acres of Unique Farmland and 384.0 acres designated as Other). The 1,104 acres of open space and utility lands south of the Specific Plan site are not proposed for development and it is expected they will remain in their existing condition (i.e., dry farming).

Project or Specific Plan Design Features. Section 12.5 of the Specific Plan contains a “right to farm” provision that will allow farming to continue on vacant land within the WLCSP until such time as it converts to developed uses. This provision will help protect onsite farming from “nuisance” claims by new landowners or tenants (e.g., dust and noise).

Mitigation Measures. Consideration was given to the contribution to an agricultural mitigation bank as potential project-related mitigation. The County of Riverside considered the establishment of an Agricultural Mitigation Bank to mitigate the loss of farmland during the adoption process of the Riverside County General Plan in 2003; however, purchase of credits in such a bank to mitigate the loss of agricultural lands as part of the Draft EIR for the County General Plan (refer to Mitigation Measures 4.2.2A, B, and C in the Draft EIR of the Riverside County Integrated Project) were specifically removed from the General Plan during the public hearings on the General Plan.¹ Since potential mitigation for regional loss of agriculture has already been considered and rejected by the County, such mitigation would be even more infeasible on a citywide basis.

The DEIR originally contained the following text. In 2009, a regional agricultural conversion report was prepared by CBRE Consultants² for an unrelated development project in the City of Perris and a similar study was prepared in 2011 for this project by Andrew Chang and Company (ACC 2012). The ACC³ and CBRE reports both concluded that the agriculture industry will continue to decline in the Inland Empire and identified three main reasons for the decline: 1) the more affordable housing market in the region compared to Los Angeles and Orange Counties, 2) the competition for cheaper farm labor from areas like the South Central Valley, and 3) lower water allocations to agriculture because of the growing urban population that receives priority for the water. The reports also noted that the agriculture industry within the Inland Empire is very small, making up only 4.1 percent of California’s total agricultural industry and only 1 percent of the regional economy in 2010. There is a clear pattern of agricultural decline from 2006 to 2010. Over these four years, 24,000 acres of farmland were removed in the Inland Empire to make way for urban land uses. Agricultural production levels were 28 percent lower in 2010 than they were in 2004. The combination of the small size of the Inland Empire’s agricultural industry and the three key economic constraints caused these studies to conclude that the agriculture industry in the Inland Empire is in decline. The ACC report concluded that the agriculture industry within the Inland Empire will become less competitive and continue to decline regardless of whether or not this project is developed. Under these circumstances, no mitigation that would artificially preserve or prolong agricultural activities (i.e., other than current market forces) in the project area and/or on the project site would be feasible or necessary.

¹ Riverside County Integrated Project website, <http://www.rcip.org/>, accessed April 5, 2012.

² Economic Viability of Agriculture in the East Inland Empire. CBRE Consulting. 2009.

³ Agriculture Industry Analysis of the Inland Empire, Andrew Chang and Company, 2012.

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The DEIR originally concluded there were no feasible mitigation measures to preserve agriculture over the long term on the project site in a regional context; however, the following Mitigation Measure 4.2.6.1A was recommended to preserve a part of the local heritage of farming for the Moreno Valley community for future generations:

Subsequent to circulation of the DEIR, it was determined that the new mitigation measure outlined below would sufficiently mitigate the loss of Unique Farmland, and so Mitigation Measure 4.2.6.1A for a “heritage farm” was no longer required.

The following mitigation measure has been added to the EIR in Response to Comment F-3-27 in Letter F-3 from California Clean Energy Committee, Comments F-7A-9, F-7A-39, and F-7A-63, in Letter F-7A from Lozeau Drury LLP, Response to Comment F-9A-43 in Letter F-9A from the Sierra Club, Response to Comment F-11-34 in Letter F-11 from the Sierra Club, Response to Comment F-13-06 in Letter F-13 from the Sierra Club et al, and related comments from others. The Response to Comment F-7A-39 outlines the changes made to the agricultural resources assessment for the project (FEIR Volume 2 Appendix C-2). In addition, a new MM 4.2.6.1A has been added to the FEIR Volume 2 requiring the acquisition of a conservation easement be recorded over land of comparable productive value to preserve offsite farmland or equal or more agricultural productivity compared to the unique farmland (refer to Response to Comment F-7A-39). It should be noted that the revised agricultural assessments determined the loss of farmland of local importance was in fact not significant under CEQA based on the results of the revised LESA model (see FEIR Volume 2 Appendices C-1 and C-4 for more information).

4.2.6.1A Prior to the issuance of any grading permit affecting land designated as “Unique Farmland” (Figure 4.2.2 in the World Logistics Center Environmental Impact Report), an Agricultural Conservation Easement shall be recorded over land of equivalent or better agricultural economic productivity of the offsite easement property compared to the World Logistics Center property. The analysis will include a comparison of the project’s “Unique Farmland” considering its relative economic potential as the best measure of productivity (i.e., net profitability per acre or potential net rental income per acre). It will include a consideration of various important physical factors including location and accessibility, soils and topography, micro and macro climatic conditions, water availability and quality, as well as local practices, good farm management and cultural (growing) costs. The form and content of this easement, as well as the estimates of agricultural productivity, shall be reviewed and approved in advance by the Planning Official.

Level of Significance after Mitigation. The eventual conversion of 25 acres of Unique Farmland is a significant impact of the project resulting from the basic project objectives. However, implementation of the additional Mitigation Measure 4.2.6.1A will reduce this impact to a less than significant level.

4.2.6.2 Conversion of Farmland to Non-Agricultural Uses

Impact 4.2.6.2: *The project would convert approximately 2,226 acres of land currently being farmed, which includes 2,201 acres of land designated as Farmland of Local Importance, to non-agricultural uses.*

Threshold	Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use, or conversion of forest land to non-forest use?
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In addition to the FMMP designations, Riverside County has established a program through which it classifies various land within the County as Locally Important Farmland. While the County has

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established criteria by which Locally Important Farmland is categorized, a small portion of that land has been so designated due simply to the historical use of the land.

The factors used by Riverside County to define Locally Important Farmland are as follows:

- Lands with soils that would be classified as Prime and Statewide Farmland but lack available irrigation water.
- Lands planted with dry land crops of barley, oats, and wheat.
- Lands producing major crops for Riverside County but that are not listed as Unique crops. These crops are identified as returning one million or more dollars on the 1980 Riverside County Agriculture Crop Report. Crops identified are permanent pasture (irrigated), summer squash, okra, eggplant, radishes, and watermelons.
- Dairylands, including corrals, pasture, milking facilities, and hay and manure storage areas if accompanied with permanent pasture or hayland of 10 acres or more.
- Lands identified by city or county ordinance as Agricultural Zones or Contracts, which includes Riverside City “Proposition R” lands.
- Lands planted with jojoba which are under cultivation and are of producing age.

The majority of the proposed project site is currently designated Farmland of Local Importance by the County. None of the above factors supports maintaining the property as farmland; it is likely that the property was designated as Locally Important Farmland based simply on the agricultural uses that at one time existed on the property. The County’s maps do not reflect the City’s General Plan Land Use Map, which shows no agricultural designations in the City.

NOTE: The following changes have been made in response to Comment G-95-54 in Letter G-95 from Thomas Thornsley.

Implementation of the project would result in the permanent conversion of approximately 2,226 acres currently used for dry farming to non-agricultural uses. While this could have an effect on accelerating the loss of other existing agricultural land, the state conservation lands to the south could be continued for agricultural production. Likewise, there is no other agricultural use in the Zone of Influence (term used in the State LESA Model) and a majority of the land in that zone is vacant (i.e., in the Badlands to the east and portions of the San Jacinto Wildlife Area and the Lake Perris State Recreation Area to the south). The conversion of agricultural lands to urban uses is supported by the City’s General Plan policies, as discussed above. The entire project site and adjacent lands have been designated for urban uses for nearly 20 years by the City. Nevertheless, much of the Specific Plan area is designated Farmland of Local Importance and will be permanently converted to non-agricultural urban uses. Therefore, the project will cause significant, unavoidable impacts related to conversion of locally important farmland (see previously referenced Figure 4.2.2).

The farming that is currently conducted on the CDFW property south of the Specific Plan area is expected to continue for the foreseeable future. The existing vacant land adjacent to the SDG&E compressor plant property is not currently being farmed, but is expected to remain vacant for the foreseeable future.

The following information was added to the LESA Model analysis in Response to Comment F-7A-39 and related comments by others, and also due to changes in the two technical studies on agricultural resources (FEIR Volume 2 Appendices C-1 and C-4).

The LESA Model. The conversion of agricultural land to non-agricultural uses is a result of various economic and demographic factors. Increased costs for water and a continuing demand for housing and commercial development in the City and region have provided the primary impetus for this agricultural land conversion. Although the project results in a significant impact related to the conversion of farmland to non-agricultural use, this EIR also refers to the State LESA model as an analytical tool by which the project's impacts on agricultural conversion can be assessed, and to further gauge the level of significance of that farmland conversion. Appendix G of the *CEQA Guidelines* states as follows: "In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation (DOC) as an optional model to use in assessing impacts on agriculture and farmland."¹ Further, the LESA model was specifically created by the DOC in order to provide "specific guidance concerning how agencies should address farmland conversion impacts." Because of its use of localized inputs as part of the model, the LESA model is generally considered the preferred methodological tool by which to assess the significance of a proposed project's impacts related to agricultural resources.

The LESA model is intended to provide lead agencies with a methodology to identify potentially significant impacts that may result from agricultural land conversions. The model is a method of rating the relative quality of land resources and potential impacts to agricultural resources.

The LESA Model uses six different factors (two based on soil resource quality and four based on on-site and adjacent land characteristics) to develop a weighted score that identifies the significance of potential impacts to agricultural resources. The Land Evaluation (LE) scoring utilizes two soil factors. The Land Capability Classification (LCC) indicates the suitability of soils for most kinds of crops and the risk of damage when they are used in agriculture, while the Storie Index provides a numeric rating (0–100) of the relative degree of suitability or value of a given soil for intensive agriculture. The Site Assessment (SA) scoring considers the size of the site to be converted, water supply restrictions in drought and non-drought years, and the presence (or absence) of adjacent agricultural, habitat, or parkland uses.

By assessing and weighing a variety of soil, water, and land use characteristics, it is possible that the conversion of a large parcel containing poor soils and with limited access to water would not result in a significant impact, while the conversion of a much smaller well-watered parcel with quality soils could be considered significant. To ensure potential impacts to adjacent agricultural activities are appropriately considered, the LESA model requires an examination of land use on all parcels within a Zone of Influence (ZOI) that extends a minimum 0.25 mile from the boundary of the site. For any site evaluated using the LESA model, the factors are rated, weighed, and combined, resulting in a single numeric score that becomes the basis for determining a project's potential significance.²

WLC Project Assessment

DEIR Assessment. To assess potential agricultural resource impacts that may result from development of the proposed site, the LESA model was run as part of the original DEIR for the entire 3,818-acre project area.³ The total LESA score for the project is 63.51, which is considered significant unless the LE and SA sub-scores fall below 20 (see Table 4.2.A). The LE sub-score is 43 and the SA sub-score is 20.5, indicating a significant impact. The worksheets detailing the variables considered

¹ *California Land Evaluation and Site Assessment Model*, Instruction Manual, State of California Department of Conservation, Office of Land Conservation, 1997.

² *California Land Evaluation and Site Assessment Model*, Instruction Manual, State of California Department of Conservation, Office of Land Conservation, 1997.

³ *Agricultural Resources Assessment for the World Logistics Center Specific Plan Draft Environmental Impact Report*, Parsons Brinckerhoff, February 2012.

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during the evaluation of each site are included in the *Agricultural Resources Assessment for the World Logistics Center Specific Plan* (DEIR Appendix C). This was the conclusion of the DEIR that was circulated for public review.

Table 4.2.A: LESA Model Significance Determination

Total LESA Score	Scoring Decision
0–39 Points	Not considered significant
40–59 Points	Considered significant <i>only</i> if LE and SA sub-scores are each <i>greater</i> than or equal to 20 points
60–79 Points	Considered significant <i>unless</i> either LE or SA sub-score is <i>less</i> than 20 points
80–100 Points	Considered significant

Source: California Land Evaluation and Site Assessment Model, Instruction Manual, State of California Department of Conservation, Office of Land Conservation, 1997.

Revised WLCSP Assessment. In response to comments regarding agricultural impacts, the LESA Model assessment prepared by Parsons Brinckerhoff (PB)(DEIR Appendix C-1) was revised to account for the smaller WLCSP project site (2,610 acres instead of 2,710 acres) and delete the CDFW Conservation Buffer Area, and to address Response to Comment F-7A-39 and related comments by others. In addition, an independent analysis was conducted on the subject by the Agribusiness, Natural Resources & Energy Practice Group of Cushman & Wakefield Western, Inc. (C&WW). Part of their analysis included the preparation of a LESA Model report to validate assumptions made in the DEIR. The revised PB analysis (FEIR Volume 2 Appendix C-1) and the new C&WW analysis (FEIR Volume 2 Appendix C-4) both determined the WLC project impact on agricultural resources is not considered significant because both the LE and SA sub-scores were less than 20 points (the revised PB report indicated an SA score of 19.5 while the new C&WW report indicated an SA score of 18.5), so mitigation is not required for this impact (i.e., “Conversion of Farmland to Non-Agricultural Uses”). In addition, Mitigation Measure 4.2.6.1A has been added to address the WLC project’s contribution to loss of agricultural resources in western Riverside County.

Project or Specific Plan Design Features. There are no features included in the Specific Plan that address the loss of agriculture on the project site.

Mitigation Measures. As stated above, consideration was given to the contribution to an agricultural mitigation bank as potential project-related mitigation. However, the County, through the adoption of its General Plan, determined that contribution to an agricultural mitigation bank is not feasible and the City of Moreno Valley followed suit in the adoption of its General Plan. **Mitigation Measure 4.2.6.1A** will help reduce impacts to agricultural resources, but development of the Specific Plan site will eventually remove 2,226 acres of locally important farmland from production, and this is considered a significant long-term impact.

Level of Significance after Mitigation. The DEIR concluded that there was no feasible mitigation to reduce the significant impacts resulting from the loss of agricultural land to a less than significant level. However, implementation of, **Mitigation Measure 4.2.6.1A**, to establish an off-site agricultural conservation easement, would mitigate the conversion of agricultural land, to non-agricultural uses. With implementation of these measures, project impacts to agricultural resources are reduced to less than significant levels.

4.2.7 Cumulative Impacts

Significant Cumulative Impact: *Riverside County has experienced a net loss of Unique Farmland over the most recent 2-year reporting period. The project contributes to the cumulative impacts of this net loss by removing an additional 25 acres of Unique Farmland from potential agricultural production in this portion of the County. In addition, it will eventually remove 2,201 acres of land that is designated as Farmland of Local Importance (including all of the land currently being dry farmed, in the project area, from potential agricultural production in this portion of the County).*¹

The DOC Office of Land Conservation publishes a Farmland Conversion Report every two years as part of its FMMP. These reports document land use conversion by acreage for each California county. The most recent data are for the 2008–2010 period,² during which Riverside County experienced a net loss of 3,300 acres of Prime Farmland, 567 acres of Farmland of Statewide Importance, and 1,742 acres of Unique Farmland. The amount of Important Farmland inventoried in Riverside County during the last countywide survey of farmland totaled 428,989 acres.

The cumulative area for agricultural resource impacts is Riverside County. As detailed in Table 4.2.B, the agricultural acreage inventoried in Riverside County by the FMMP has declined in each of the five past reporting cycles. The total planted acreage in Riverside County has fluctuated during the past five years (Table 4.2.C).

Table 4.2.B: Agricultural Acreage Inventoried

	Reporting Period				
	2010	2008	2006	2002	2000
Riverside County	428,989	433,877	444,455	479,278	609,535

Note: Though designated agricultural land, acreage may not necessarily be planted or otherwise used for agricultural uses.
Source: Table A-25 Riverside County 2008-2010 Land Use Conversion, California Department of Conservation, 2012.

Table 4.2.C: Planted Acreage

	Reporting Period				
	2010	2009	2008	2007	2006
Riverside County	209,913	202,066	246,012	214,050	216,219

Source: Riverside County 2010 Agricultural Production Report, 2010.

While agricultural land is a finite resource, the City, through its designation of the site for non-agricultural urban uses in its General Plan, has previously considered that continuing development pressures in the City and region would result in the conversion of agricultural land to non-agricultural uses. The utilization of the property sites for agricultural activity would impede the City from achieving the goals and objectives set forth in its General Plan.

As explained previously, the CBRE and the ACC reports concluded that the agriculture industry within the Inland Empire will become less competitive and continue to decline whether or not the proposed project is developed. Under these circumstances, no mitigation that would artificially preserve or prolong agricultural activities (i.e., other than current market forces) in the project area would be feasible or effective over the long term.

¹ Revision made in response to Comment G-95-57 in Letter G-95 from Thomas Thornsley.

² Table A-25 Riverside County 2008–2010 Land Use Conversion, Farmland Mapping and Monitoring Program, California Department of Conservation Division of Land Resource Protection, http://redirect.conservation.ca.gov/dlrp/fmmp/county_info_results.asp; website accessed April 4, 2012.

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The continuation of agricultural operations on site over the long term is likely not economically viable. The County continues to experience a net loss of Unique Farmland and Farmland of Local Importance, and the development of the project would contribute to the countywide net loss of designated farmland. However, with implementation of Mitigation Measure 4.2.6.1A, the WLC project will not make a significant contribution to cumulative agricultural impacts in western Riverside County.

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NOTE TO READERS. *This section has been revised to reflect changes from the original DEIR as a result of the following:*

- *Reduction of the project size by 100 acres and 1 million square feet of building space from the Specific Plan (in the southwest corner);*
- *Commensurate changes to the Traffic Impact Assessment (TIA, see Section 4.15);*
- *Updated trip lengths based on the revised TIA;*
- *Updated CalEEMod computer program with updated emission factors;*
- *Revised mitigation in response to comments;*
- *Change in project construction phasing (from 10 to 15 years);*
- *Updated EMFAC2014 emission factor model;*
- *Updated OEHHA health risk methodology; and*
- *Use of the latest Health Effects Institute (HEI) research that demonstrates that new technology diesel exhaust does not cause cancer.*

In January 2015, the results of a 5½-year study, led by the Health Effects Institute, were published regarding the health effects of new technology diesel exhaust and particularly the risk of cancer from exposure to diesel exhaust. The study found that new technology diesel exhaust does not cause cancer.

The HEI study distinguishes between older Traditional Diesel Engines (TDE) (exhaust from engines that are older than model year 2007) and new technology diesel exhaust (NTDE) (exhaust from engines model year 2007 or newer), which is 90-99% cleaner than TDE. The revised mitigation measures contained in this section require that all diesel trucks accessing the project during operation be model year 2010 or newer and that all off-road equipment meet Tier 4 engine standards. The results of the HEI Study indicate that the project mitigation requiring the application of Model Year 2010 engines as well as the use of Tier 4-compliant off-road construction equipment are not expected to result in emissions that would be associated with the formation of cancer in exposed individuals.

The DEIR contained an air quality analysis prepared before the release of the HEI study. As a result, the DEIR analysis assumed that any diesel exhaust, including NTDE, could cause cancer. For comparison to the DEIR, the following discussion analyzes the health risks which would occur if NTDE could cause cancer, which, as noted above, it does not. This is only for informational purposes and does not reflect the health risks associated with the World Logistics Center project.

HEI is an independent, non-profit research institute funded by the U.S. Environmental Protection Agency (EPA) and industry, and supported by the California Air Resources Board (CARB), the U.S. Federal Highway Administration, the US Department of Energy, Engine Manufacturers Association, American Petroleum Institute and the Coordinating Research Council to provide credible, high quality science on air pollution and health for air quality decisions.

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These changes also resulted in updates to the traffic and air quality technical studies and proposed mitigation measures. In addition, this section has been revised in response to public comments received on the Programmatic DEIR.

4.3 AIR QUALITY

This section analyzes the proposed project's potential air quality impacts and provides a discussion of the proposed project, the physical setting of the project area, and the air quality regulatory framework. The air quality analyses evaluate potential air quality impacts by examining the short-term construction as well as long-term operational impacts associated with the project and by evaluating the effectiveness of the identified mitigation measures. Modeled air quality levels are based upon vehicle data and project trip generation included in the project's *Traffic Impact Analysis* and peak turn volumes generated for the proposed project combined with emission factors from the CARB. The evaluation was prepared in accordance with appropriate standards, utilizing procedures and methodologies as recommended by the South Coast Air Quality Management District (SCAQMD), the California Office of Environmental Health Hazards Assessment (OEHHA), and CARB. Air quality data posted by the SCAQMD, CARB, and the EPA web sites are included to document the local air quality environment and are incorporated herein by reference.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The analysis contained in this section is based on the following technical studies prepared for the proposed project:

- *Air Quality, Greenhouse Gas, and Health Risk Assessment Report* (Michael Brandman Associates – First Carbon Solutions [MBA-FCS], original dated January 29, 2013 and revised April 2015) contained in Appendix D of this EIR; and
- *Traffic Impact Analysis Report, The World Logistics Center*, (Parsons Brinkerhoff, Inc., original dated January 28, 2013 and revised September 2014) contained in Appendix L of this EIR.

In addition to these project-specific technical studies, the analysis contained in this section is also based on the following reference documents:

- *CEQA Air Quality Handbook*, South Coast Air Quality Management District, 1993;
- *Final EIR City of Moreno Valley General Plan*, July 2006;
- *Conservation Element*, City of Moreno Valley General Plan, adopted July 11, 2005;
- *Final 2012 Air Quality Management Plan*, South Coast Air Quality Management District ;
- Health Effects Institute, 2015: HEI Research Report 184, Advanced Collaborative Emissions Study (ACES); Lifetime Cancer and Non-Cancer Assessment in Rats Exposed to New-Technology Diesel Exhaust, January, 2015; and
- Other reference material, as cited herein and in the *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*.

4.3.1 Existing Setting

The project site is located in the South Coast Air Basin (Basin), a geographic area that encompasses the coastal plain and connecting broad inland valleys and low hills. The Pacific Ocean forms the southwestern border of the Basin, with mountain ranges forming the remainder of the border. The Basin includes Orange County and the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. The Basin is under the jurisdiction of the SCAQMD.

Note: The following text has been added to help the reader better understand the complex topic of air quality.

The air quality in the air basin has been steadily improving over the last couple of decades as measured in air pollutant concentrations by the SCAQMD. A concentration of a pollutant is a measure of the amount of a pollutant in the air. Some pollutants are measured in parts per million (ppm) and some are measured in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

When sensitive people, such as children, pregnant women, and the elderly, breathe in air pollutants, they can experience health effects. These health effects differ based on the type of pollutant, the length of time someone is exposed, pre-existing health conditions, and the concentration of the pollutant. In general, health effects can include coughing, sore throat, chest pain, difficulty breathing, eye irritation, reduced lung function, asthma aggravation, chronic lung diseases, cancer, and lung damage.

Federal, state, and local agencies enact rules and regulations to reduce air pollutant emissions to protect the health of sensitive individuals. The EPA sets federal ambient air quality standards and the CARB sets state ambient air quality standards. When concentrations of pollutants exceed the standards, sensitive individuals may experience health effects.

Ozone is a pollutant formed in the air when emissions of volatile organic compounds (VOC) and nitrogen oxides (NO_x) combine in the presence of sunlight. Ozone is a pollutant of concern in the air basin because ozone levels exceed the ozone standards.

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As shown in Figure 4.3.1, ozone concentrations in the basin have generally decreased over the past twenty years for 1-hour and 8-hour averaging time periods as defined by the State and/or federal ambient air quality standards. The 1-hour and 8-hour concentration refers to the average of the concentration over a 1-hour and 8-hour time period, respectively.

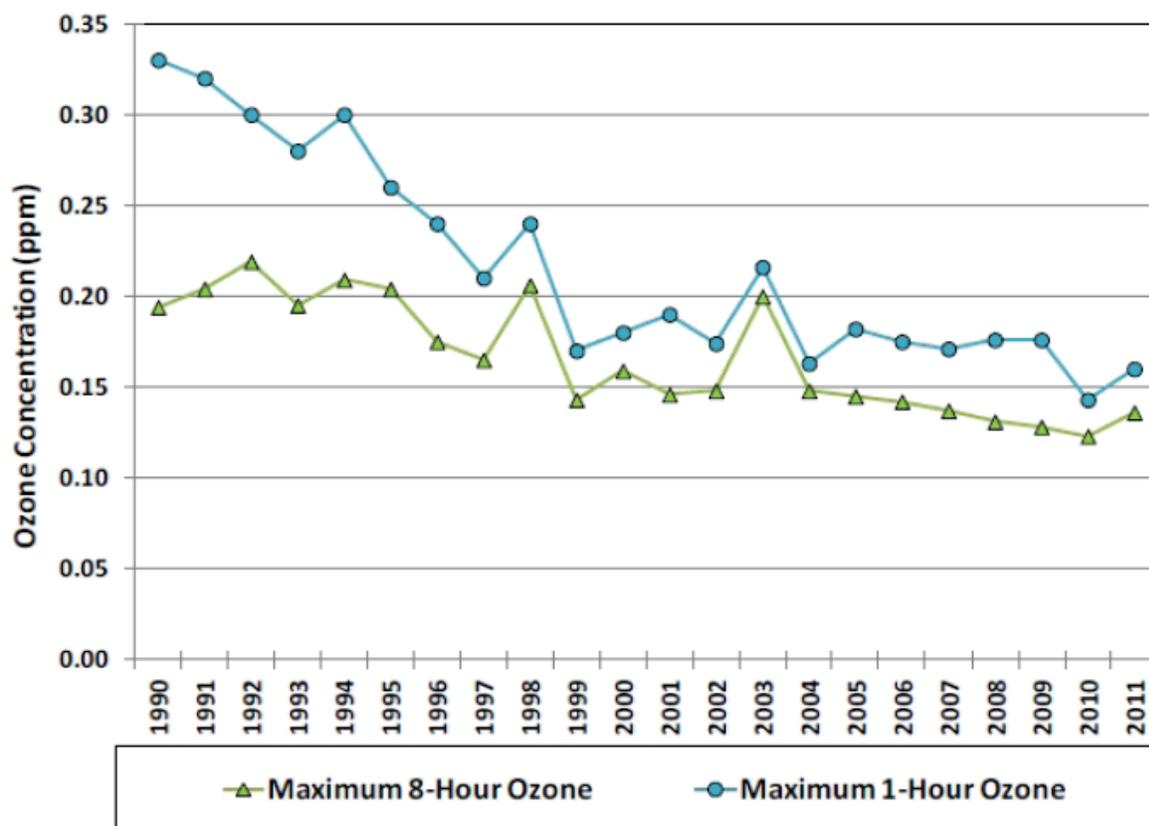


Figure 4.3.1: Ozone Concentration Trends in the South Coast Air Basin

As shown in Figure 4.3.2, the main source of NO_x and VOC emissions in the basin are from on-road motor vehicles, not from the operation of buildings. Although vehicle miles traveled in the basin continue to increase, ozone concentrations are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with cleaner and lower-emitting vehicles. VOC and NO_x are ozone precursors; therefore, if those emissions decrease, it follows that ozone concentrations would also decrease.

Emissions of NO_x in the air basin are expected to decrease in the future despite future growth in population, and vehicle miles traveled, as shown in Figure 4.3.3.

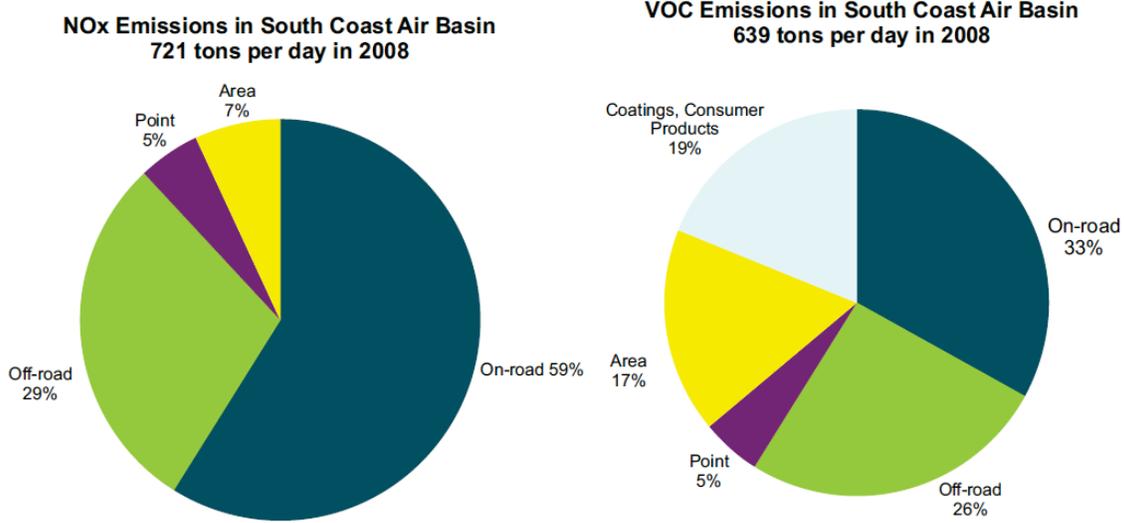


Figure 4.3.2: Ozone Precursor Emissions (VOC and NOx) in the South Coast Air Basin

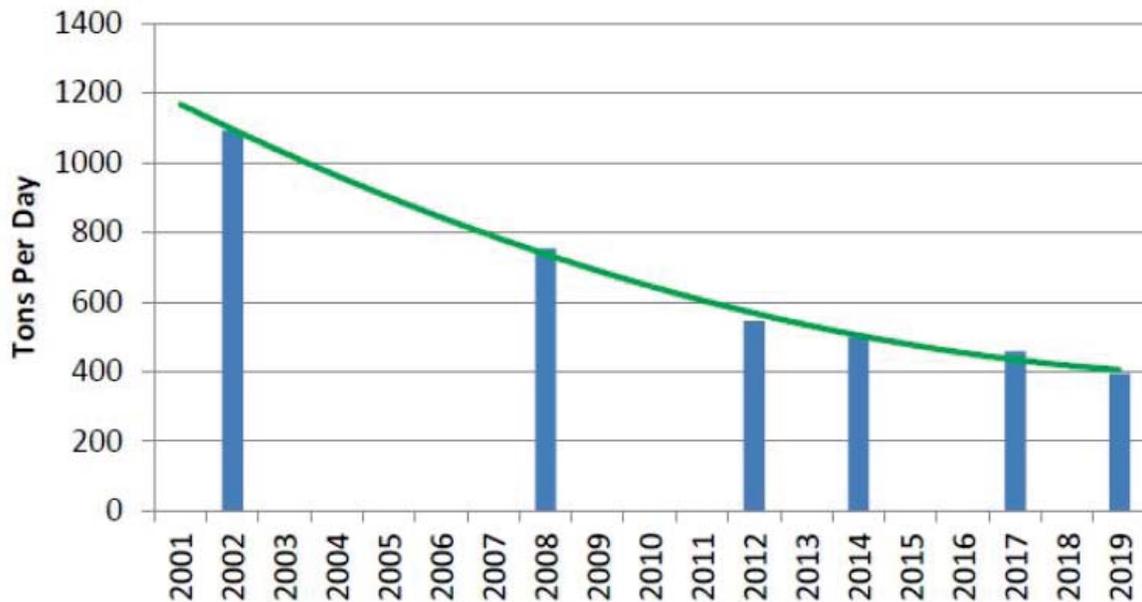


Figure 4.3.3: NOx Emissions Forecast in the South Coast Air Basin

Another pollutant of concern is particulate matter (PM). PM is a mixture of small particles and liquid droplets suspended in the air. It is made up of components such as chemicals, metals, soil, or dust particles. The size of these particulates is linked to their potential for causing health problems. Ultrafine particles are less than 0.1 in micron in diameter, fine particles are less than 2.5 microns in diameter (PM_{2.5}), and coarse particles are larger than 2.5 microns and smaller than 10 microns in diameter (PM₁₀). The CARB and EPA have established standards for PM_{2.5} and PM₁₀ but not for ultrafine particles. PM_{2.5} and PM₁₀ are a concern in the air basin because sometimes the concentrations exceed the standards. PM_{2.5} is often used as a marker for toxic air pollutants such as diesel PM.

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As shown in Figure 4.3.4, PM_{2.5} emissions are expected to decrease in the Basin and then level out after the year 2014.

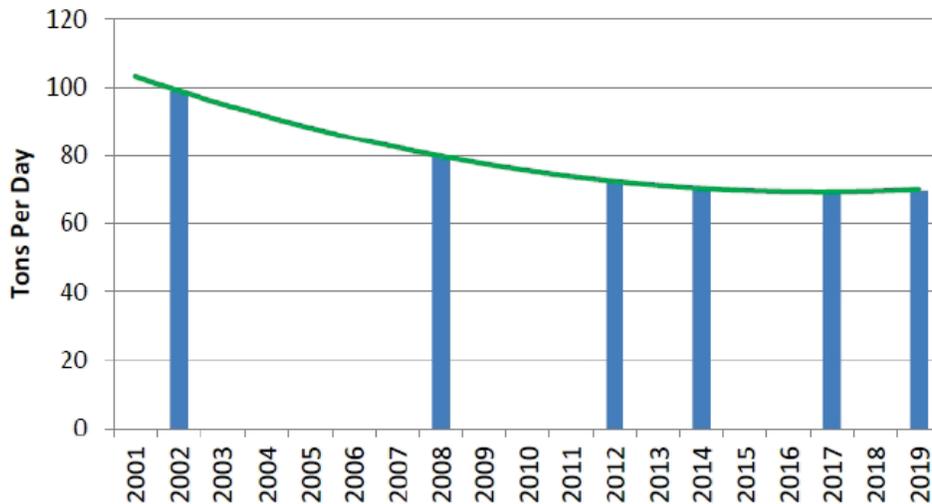


Figure 4.3.4: PM_{2.5} Emissions Forecast in the South Coast Air Basin

As shown in Figure 4.3.5, PM₁₀ and PM_{2.5} annual concentrations have continued to decrease since 1990 within the air basin as a whole.

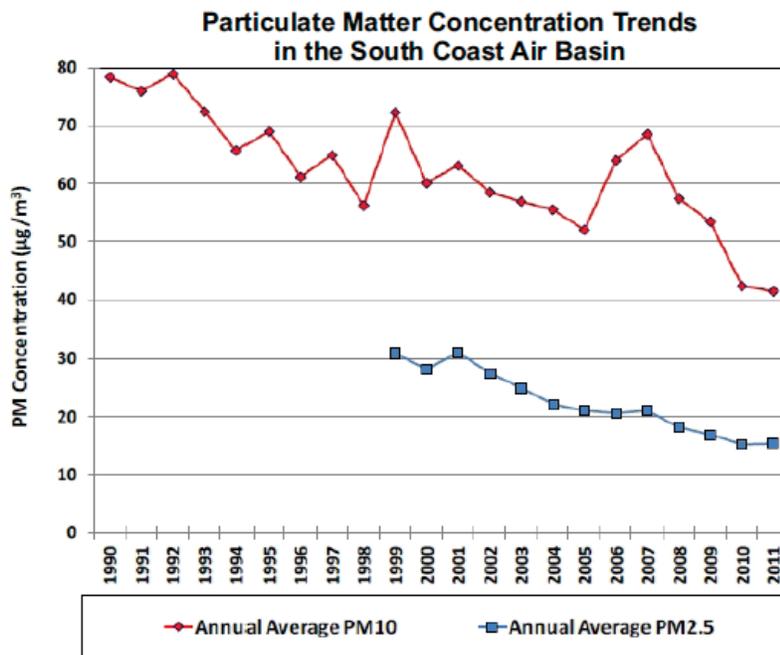


Figure 4.3.5: Particulate Matter Concentration Trends in the South Coast Air Basin

Figure 4.3.6 provides an additional view of PM_{2.5} trends specifically in the Inland Empire. As shown, there is a marked decreasing trend in PM_{2.5} concentrations in Riverside-Rubidoux, Fontana, and San Bernardino from 2001 to 2012 and at Mira Loma from 2006 to 2012. The relevance of these trends is

that PM_{2.5} levels have displayed a decreasing trend in the Inland Empire despite increases in urban development including the development of large warehouse complexes since 2001.

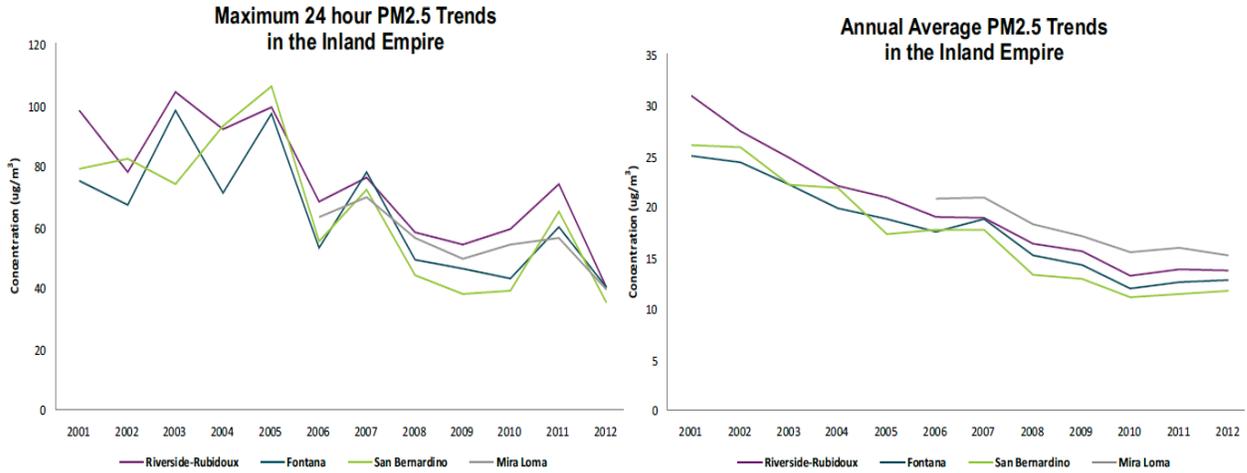


Figure 4.3.6: PM_{2.5} Concentration Trends in the Inland Empire

Part of the success in the decreasing NO_x and PM emissions are standards placed on motor vehicles. Figure 4.3.7 demonstrates the changes in U.S. heavy duty diesel emission standards for NO_x and PM. The project would incorporate mitigation that would require that all heavy duty diesel trucks accessing the project incorporate 2010 emissions standards. As shown below, the 2010 standards are only a fraction of the older standards, at 0.2 grams per horsepower hour (g/HP-hr) of NO_x and 0.01 g/HP-hr of PM. The text in blue represents the off-road construction standards; 2011 is Tier 4 Interim and 2014 is Tier 4 Final.

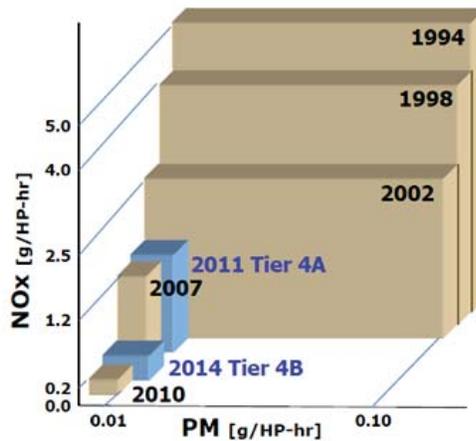


Figure 4.3.7: Changes in U.S. Heavy-Duty Diesel NO_x and PM Emission Standards

4.3.1.1 Climate and Meteorology

Air quality in the project area is not only affected by various emission sources (mobile, industry, etc.), but also by atmospheric conditions such as wind speed, wind direction, temperature, rainfall, and amount of sunshine. The combination of topography, low atmospheric mixing height, abundant sunshine, and emissions from the second largest urban area in the United States combine to give the Basin one of the worst air pollution problems in the nation.

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Winds in the Basin are predominantly of relatively low velocities, averaging about 4.0 miles per hour (mph). These low average wind speeds, together with a persistent temperature inversion, limit the vertical dispersion of air pollutants throughout the Basin. Strong, dry, north or northeasterly winds, known as Santa Ana winds, occur during the fall and winter months, dispersing air contaminants. These conditions tend to last for several days at a time.

During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas of Los Angeles County are transported predominantly inland into Riverside and San Bernardino Counties. In the winter, the greatest pollution problems are carbon monoxide (CO) and oxides of nitrogen (NO_x), because of extremely low inversions and air stagnation during the night and early morning hours that trap emissions principally from mobile sources. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO_x to form photochemical smog.

4.3.1.2 Regional Air Quality

Both the State of California and the Federal government have established health-based ambient air quality standards (AAQS) for six air pollutants. These pollutants are known as “criteria pollutants.”

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen dioxide (NO₂)
- Ozone (O₃)
- Particulate matter with a diameter of 10 microns or less (PM₁₀)
- Sulfur dioxide (SO₂)

Federal standards for 8-hour ozone and for fine particulate matter less than 2.5 microns in diameter (PM_{2.5}) have also been adopted. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety and are listed in Table 4.3.A. Table 4.3.B lists the health effects of these criteria pollutants and their potential sources.

Note: Episode criteria and smog alerts are no longer used by the CARB or the SCAQMD; the EPA's Air Quality Index is now used. Therefore, the following text has been deleted and information regarding the Air Quality Index has been added.

The **Air Quality Index** is an index developed and reported by the United States EPA for reporting daily air quality. It indicates how clean or polluted the air is and what associated health effects might be a concern. The Air Quality Index focuses on health effects that may be experienced within a few hours or days after breathing polluted air. Descriptions for the various levels in the Air Quality Index are shown in Table 4.3.C.

The federal 8-hour ambient air quality standard for ozone is 75 ppb and the California standard is 70 ppb. The California 1-hour standard for ozone is 90 ppb (there is no federal 1-hour standard). As shown in the table, to achieve the federal ambient air quality standard for ozone, the Air Quality Index would need to be below 101. To achieve the state 8-hour ambient air quality standard for ozone, the Air Quality Index would need to be below 84.

In the Moreno Valley area in 2010 and 2011, the air quality index was greater than 150 for one day for each year. That means the air was unhealthy for one day in 2010 and one day in 2011. If the future years follow that trend, then one day during each of the construction years would cease construction activities.

Indirect sources of pollution are generated when minor sources collectively emit a substantial amount of pollution. Examples of this would be the motor vehicles at intersections, malls, and on highways. The California Clean Air Act (CCAA) provides the SCAQMD with the authority to manage transportation

activities at indirect sources. The SCAQMD also regulates stationary sources of pollution throughout its jurisdictional area. Direct emissions from motor vehicles are regulated by the CARB.

The narrative below describes the pollutant characteristics, mechanisms of pollutant origination, and health effects for the criteria pollutants (i.e., pollutants specifically regulated under the Federal Clean Air Act [CAA] and/or the California Clean Air Act [CCAA]) and other pollutants of concern. Because the concentration levels of the AAQS were set with an adequate margin to protect public health and safety, these health effects will not occur unless the standards are exceeded by a large margin or for a prolonged period of time. State AAQS are more stringent than Federal AAQS. An additional discussion of health effects is contained in the *Air Quality, Greenhouse Gas, and Health Risk Assessment* (2015).

- *Carbon Monoxide*

- Description and Properties: CO is colorless, odorless toxic gas produce by incomplete combustion of carbon-containing fuels (e.g., gasoline, diesel fuel, and biomass). CO is a primary pollutant, meaning it is emitted directly into the air (unlike secondary pollutants such as ozone that are formed by the reactions of other pollutants). CO levels tend to be highest during the winter months when the meteorological conditions support the accumulation of the pollutants. This occurs when relatively low inversion levels trap pollutants near the ground and concentrated the CO (EPA 2006c). Because CO is somewhat soluble in water, normal winter conditions of rainfall and fog can suppress CO conditions.
- Health Effects: CO is essentially inert to plants and materials but can have significant effects on human health. CO gas enters the body through the lungs, dissolves in the blood, and replaces oxygen as an attached hemoglobin. This binding reduces available oxygen in the blood and; therefore, reduces oxygen delivery to the body's organs and tissues. Effects on humans range from slight headaches to nausea to death. Elevated levels of CO can also cause visual impairments, reduced manual dexterity, poor learning ability, reduced work capacity, and trouble performing complex tasks.
- Sources: The major sources of CO are on-road vehicles, aircraft, and off-road equipment, or any source that burns fuel including residential heaters and stoves. Since most of the CO sources are the indirect result of urban development, most emissions and unhealthy CO levels occur in major urban areas.

- *Ozone*

- Description and Physical Properties: O₃ is known as a photochemical pollutant. Ozone is not emitted directly into the atmosphere, but is formed by a complex series of chemical reactions between reactive organic gases (ROG) or volatile organic compounds (VOC), NO_x, and sunlight. ROG and NO_x are emitted from automobiles, solvents and fuel combustion, the sources of which are widespread throughout the SCAQMD. Significant ozone formation generally requires an adequate amount of precursors in the atmosphere and several hours in a stable atmosphere with strong sunlight. The conditions conducive to the formation of ozone include extended periods of daylight (solar radiation) and hot temperatures. These conditions are prevalent during the summer when thermal inversions are most likely to occur. As a result, summertime conditions of long periods of daylight and hot temperatures form ozone in the greatest qualities. During the summer, thermal inversions trap ozone from dispersing vertically, high concentrations of this pollutant are prevalent.

Note: Table 4.3.C in the original DEIR was entitled "Attainment Status of Criteria Pollutants in the South Coast Air Basin" and has been moved to later in this section and renumbered Table 4.3.D.

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Table 4.3.A: Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		Federal Standards ²		Method ⁷	Footnotes
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ⁶		
Ozone (O ₃)	1-Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry	California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, suspended particulate matter (PM ₁₀ and PM _{2.5}) and visibility-reducing particles, are values that are not to be exceeded. All others are not to be equated or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
	8-Hour	0.070 ppm (137 µg/m ³)	Gravimetric or Beta Attenuation	0.075 ppm (147 µg/m ³) 150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
Respirable Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	50 µg/m ³	Gravimetric or Beta Attenuation	—	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth-highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM ₁₀ , the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m ³ is equal to or less than one. For PM _{2.5} , the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current federal policies.
	24-Hour	20 µg/m ³	No Separate State Standard	—	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
Fine Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
	8-Hour	9.0 ppm (10 mg/m ³)	Non-Dispersive Infrared Photometry	9 ppm (10 mg/m ³) 35 ppm (40 mg/m ³)	None	Non-Dispersive Infrared Photometry (NDIR)	
Carbon Monoxide (CO)	1-Hour	20 ppm (23 mg/m ³)	Infrared Photometry (NDIR)	—	None	—	Any equivalent procedure which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	Gas Phase Chemiluminescence	53 ppb (100 µg/m ³) 100 ppb (188 µg/m ³) (see footnote 8)	Same as Primary Standard	Gas Phase Chemiluminescence	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (67 µg/m ³)	Gas Phase Chemiluminescence	—	None	—	National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
	1-Hour	0.18 ppm (339 µg/m ³)	Ultraviolet Fluorescence	0.030 ppm (for certain areas) (see footnote 9) 0.14 ppm (for certain areas)	None	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)	
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	—	—	—	National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
	24-Hour	0.04 ppm (105 µg/m ³)	Atomic Absorption	75 ppb (186 µg/m ³) (see footnote 9)	Same as Primary Standard	High-Volume Sampler and Atomic Absorption	
Lead ¹⁰	3-Hour	—	Atomic Absorption	—	—	—	Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.
	1-Hour	0.25 ppm (655 µg/m ³)	Atomic Absorption	1.5 µg/m ³ 0.15 µg/m ³	—	—	
Sulfur Dioxide (SO ₂)	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	—	—	To attain this standard, the 3-year average of the 98 th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100 ppm effective January 22, 2010. Note that the EPA standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standards of 65 ppb and 100 ppb are identical to 0.065 ppm and 0.100 ppm, respectively.
	Rolling 3-Month Average ¹¹	—	Atomic Absorption	—	—	—	
Visibility-Reducing Particles	8-Hour	Extinction coefficient of 0.23 per kilometer - visibility of ten miles or more (0.07-30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.	Beta Attenuation and Transmittance through Filter Tape	—	—	—	On June 2, 2010, the U.S. EPA established a new 1-hour SO ₂ standard, effective August 23, 2010, which is based on the 3-year average of the annual 98 th percentile of 1-hour daily maximum concentrations. EPA also proposed a new automated Federal Reference Method (FRM) using the ultraviolet technology, but will retain the older pararosaniline methods until the new FRM have adequately permeated State monitoring networks. The EPA also revoked both the existing 24-hour SO ₂ standard of 0.14 ppm and the annual primary SO ₂ standard of 0.030 ppm, effective August 23, 2010. The secondary SO ₂ standard was not revised at that time; however, the secondary standard is undergoing a separate review by EPA. Note that the new standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the new primary national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
Sulfates Hydrogen Sulfide	24-Hour	25 µg/m ³	Ion Chromatography	—	—	—	The CARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
	1-Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence	—	—	—	
Vinyl Chloride ¹⁰	24-Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography	—	—	—	National lead standard, rolling 3-month average; final rule signed October 15, 2008.

Source: California Air Resources Board, 2013.

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Table 4.3.B: Summary of Health Effects of the Major Criteria Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O ₃)	<ul style="list-style-type: none"> Atmospheric reaction of organic gases (ROG or VOC) with nitrogen oxides in the presence of sunlight. 	<ul style="list-style-type: none"> Breathing difficulty. Lung tissue damage. Damage to rubber and some plastics.
Nitrogen Dioxide (NO ₂)	<ul style="list-style-type: none"> Motor vehicle exhaust. Heavy construction equipment exhaust. Farming equipment exhaust. Residential heating. 	<ul style="list-style-type: none"> Lung irritation and damage. Formation of acid rain.
Carbon Monoxide (CO)	<ul style="list-style-type: none"> Motor vehicle exhaust. Heavy construction equipment exhaust. Farming equipment exhaust. Residential heating. 	<ul style="list-style-type: none"> Reduced tolerance for exercise. Impairment of mental function. Impairment of fetal development. Death at high levels of exposure. Aggravation of some heart diseases (angina).
Suspended Particulate Matter (PM _{2.5} and PM ₁₀)	<ul style="list-style-type: none"> Motor vehicle exhaust (PM_{2.5}). Equipment and industrial sources (PM_{2.5}). Residential and agricultural burning (PM_{2.5} and PM₁₀). Atmospheric chemical reactions (PM_{2.5} and PM₁₀). Road dust (PM₁₀). Windblown dust (Agriculture [PM₁₀]) Construction (Fireplaces [PM₁₀]) 	<ul style="list-style-type: none"> Reduced lung function. Aggravation of the effects of gaseous pollutants. Aggravation of respiratory and cardiorespiratory diseases. Increased cough and chest discomfort. Soiling. Reduced visibility.
Sulfur Dioxide (SO ₂)	<ul style="list-style-type: none"> Coal/oil- burning power plants. Industries, refineries, and diesel engines. 	<ul style="list-style-type: none"> Increased lung disease. Breathing problems for asthmatics. Formation of acid rain.
Lead (Pb)	<ul style="list-style-type: none"> Metal smelters. Resource recovery. Leaded gasoline. Deterioration of lead paint. 	<ul style="list-style-type: none"> Learning disabilities. Brain and kidney damage.

Source: California Air Resources Board 2009 (<http://www.arb.ca.gov/research/health/fs2/fs2.htm>).

Table 4.3.C: Air Quality Index Descriptions (new table)

Air Quality Index Levels of Health Concern	Air Quality Index Numerical Range	Ozone Concentration for Air Quality Index (ppb)		Meaning
		8-Hour	1-Hour	
Good	Low: 0 High: 50	—	—	Air quality is considered satisfactory, and air pollution poses little or no risk.
Moderate	Low: 51 Std: 84* High: 100	Low: 59 Std: 70*	Low: 85	Air quality is acceptable; however, for some pollutants there may be a moderate health concern for a very small number of people who are unusually sensitive to air pollution.
Unhealthy for Sensitive Groups	Low: 101 High: 150	Low: 75 (also the federal standard)	Low: 125	Members of sensitive groups may experience health effects. The general public is not likely to be affected. People with heart or lung disease, children, and older adults are considered sensitive and are at greater risk. For ozone, people who are active outdoors are also considered sensitive.
Unhealthy	Low: 151 High: 200	Low: 95	Low: 165	Everyone may begin to experience health effects; members of sensitive groups may experience more serious health effects.
Very Unhealthy	Low: 201 High: 300	Low: 115	Low: 205	Health alert: everyone may experience more serious health effects
Hazardous	Low: 301 High: 500	Low: 374	Low: 405	Health warnings of emergency conditions. The entire population is more likely to be affected.

ppb = parts per billion (a measure of concentration) * Std = 8-hour California ozone ambient air quality standard

Source: MBA-FCS 2015

- Health Effects: Health effects of ozone can include respiratory system irritation, reduction of lung capacity, asthma aggravation, inflammation and damage to lung cells, aggravated cardiovascular disease, and permanent lung damage. The greatest health risk is to those who are more active outdoors during smoggy periods, such as children, athletes, and outdoor workers. Ozone also damages natural ecosystems such as forests, foothill communities, and damages agricultural crops and some man-made materials such as rubber, paint, and plastics.
- Sources: Ozone is a secondary pollutant, thus is not emitted directly in the lower level of the atmosphere. The sources of ozone precursors (ROG and NO_x) are discussed above in the description of ozone.
- *Oxides of Nitrogen*
 - Description and Physical Properties: During combustion of fossil fuels, oxygen reacts with nitrogen to produce NO_x (NO, NO₂, NO₃, N₂O, N₂O₃, N₂O₄, and N₂O₅). Atmospheric deposition of NO_x occurs when atmospheric or airborne nitrogen is transferred to water, vegetation, soil, or other materials. Acid deposition involves the deposition of nitrogen and/or sulfur acidic compounds that can harm natural resources and materials. NO_x is also an ozone precursor. When NO_x and ROG are released in the atmosphere, they can also be a precursor to PM₁₀ and PM_{2.5}.
 - Health Effects: The EPA has concluded that the only form of NO_x that exists at a level high enough to cause public health concerns is nitrogen dioxide (NO₂) (EPA 1997). Nitrogen dioxide is a brown gas with a strong odor. NO_x can react with moisture, ammonia, and other compounds to form nitric acid and related particles. The main human health concerns of nitrogen dioxide include lung damage, increased incidence of chronic bronchitis, eye and mucus membrane damage, negative effects on the respiratory system, pulmonary dysfunction, and premature death. Small particles can penetrate deeply into the sensitive tissue of the lungs and can cause or worsen respiratory disease such as emphysema, asthma, and bronchitis, and can also aggravate existing heart disease (EPA 2005b). Because NO_x is an ozone precursor, the health effects associated with ozone are also indirect health effects associated with unhealthy levels of NO_x emissions.
 - Sources: A major source of NO_x includes stationary source fuel combustion (i.e. manufacturing and industrial, food and agricultural processing, and service commercial uses). Additionally, NO_x emission sources include motor vehicles internal combustion engines and electric utility and industrial boilers powered by fossil fuel combustion. Natural sources of NO_x include lightning, soils, wildfires, stratospheric intrusion, and the oceans. Natural sources accounted for approximately seven percent of 1990 emissions of NO_x for the United States. On-road vehicles also contribute to NO_x emissions.
- *Sulfur Dioxide*
 - Description and Physical Properties: Sulfur dioxide (SO₂) is a colorless, pungent gas. At levels greater than 0.5 ppm, the gas has a strong odor, similar to rotten eggs. Sulfuric acid is formed from sulfur dioxide, which is an aerosol particle component that affects acid deposition. Sulfur oxides (SO_x) include sulfur dioxide and sulfur trioxide (SO₃). The gas can also be produced in the air by dimethylsulfide and hydrogen sulfide. Sulfur dioxide is removed from the air by dissolution in water, chemical reactions, and transfer to soils and ice caps. Historically, sulfur dioxide was a pollutant of concern. However, with the successful application of regulations at the State and local level, the levels of sulfur dioxide have been reduced dramatically in the past several decades. The CARB, the State regulatory agency charged with regulating air pollution in the State, demonstrates that sulfur dioxide levels in the State are well below the maximum standards (CARB 2006b, Page 107, 408, and 409). Although sulfur dioxide concentrations have been reduced to levels well below State and Federal standards, further reductions are desirable because sulfur dioxide is a precursor to

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sulfate and PM₁₀. Sulfates are a particulate formed through the photochemical oxidation of sulfur dioxide.

- Health Effects: Sulfur dioxide is a soluble gas; therefore, it can be absorbed in the mucous membranes of the respiratory tract and nose. Long-term exposure of high levels of sulfur dioxide can cause irritation of existing cardiovascular disease, respiratory illness, and changes in the defenses in the lungs. When people with asthma are exposed to high levels of sulfur dioxide for short periods of time during moderate activity, effects may include wheezing, chest tightness, or shortness of breath (EPA 2000).
- Sources: Anthropogenic, or human caused, sources include fossil-fuel combustion, mineral ore processing, and chemical manufacturing. Volcanic emissions are a natural source of sulfur dioxide.
- *Lead*
 - Description and Physical Properties: Lead (Pb) is a solid heavy metal that can exist in air pollution as an aerosol particle component. An aerosol is a collection of solid, liquid, or mixed-phase particles suspended in the air. Lead was first regulated as an air pollutant in 1976. Leaded gasoline was first marketed in 1923 and was used in motor vehicles until around 1970. The exclusion of lead from gasoline helped to decrease emissions of lead in the United States from 219,000 to 4,000 short tons per year between 1970 and 1997. Even though leaded gasoline has been phased out in most countries, some still use leaded gasoline. The mechanisms by which lead can be removed from the atmosphere (sinks) include deposition to soils, ice caps, and oceans, and inhalation.
 - Health Effects: Lead accumulates in bones, soft tissue, and blood and can affect the kidneys, liver, and nervous system. The more serious effects of lead poisoning include behavior disorders, mental retardation, and neurological impairment. Low levels of lead in fetuses and young children can result in nervous system damage, which can cause learning deficiencies and low IQs. Lead may also contribute to high blood pressure and heart disease.
 - Sources: Lead-ore crushing, lead-ore smelting, and battery manufacturing are currently the largest sources of lead in the atmosphere in the United States. Other sources include dust from soils contaminated with lead-based paint, soil waste disposal, and crustal physical weathering.
- *Particulate Matter (PM₁₀ and PM_{2.5})*
 - Description and Physical Properties: Particulate matter is a generic term that defines a broad group of chemically and physically different particles (either liquid droplets or solids) that can exist over a wide range of sizes. Examples of atmosphere particles include those produced from combustion (diesel soot or fly ash), light produced (urban haze), sea spray produced (salt particles), and soil-like particles from re-suspended dust. In discussions of air pollution, particulate matter is typically divided up into two size categories: PM₁₀ and PM_{2.5} because of the adverse health effects associated the smaller-sized particles. PM₁₀ refers to particulate matter that is 10 microns or less in diameter (1 micron is one-millionth of a meter, also known as a micrometer [μm]). PM_{2.5} refers to particulate matter that is 2.5 microns or less in a diameter. Soil dust consists of the minerals and organic material found in soil being lifted up into the air by winds (e.g., fugitive dust).
 - Health Effects: Particulate matter can be inhaled directly into the lungs where it can be absorbed into the bloodstream. It is a respiratory irritant and can cause direct pulmonary effects such as coughing, bronchitis, lung disease, respiratory illnesses, increased airway reactivity, and exacerbation of asthma. Relatively recent mortality studies have shown a statistically significant direct association between mortality and daily concentrations of particulate matter in the air. Non-health effect includes reduced visibility and soiling of property.

- Sources: Particulate matter originates from a variety of stationary and mobile sources. Stationary sources include fuel combustion for electrical utilities, residential space heating, and industrial processes; construction and demolition; metals, minerals, and petrochemicals; wood products processing; mills and elevators used in agriculture; erosion from tilled lands; waste disposal and recycling. Mobile or transportation-related sources include particulate matter from highway vehicles and non-road vehicles and fugitive dust from paved and unpaved roads. Secondary particulate matter is formed in the atmosphere through chemical reactions that can involve ROG, SO_x, NO_x, and ammonia.
- *Diesel Particulate Matter*
 - Description and Physical Properties: Diesel particulate matter (DPM) is a source of PM_{2.5} because the size of diesel particles are typically 2.5 microns and smaller. In 1998, DPM made up about 6 percent of the total PM_{2.5} inventory nationwide (EPA 2002). Diesel exhaust is a complex mixture of thousands of particles and gases that is produced when an engine burns diesel fuel. DPM includes the particles-phase constituents in diesel exhaust. Organic compounds account for 80 percent of the total particulate matter mass, which is composed of compounds such as hydrocarbons and their derivatives, and polycyclic aromatic hydrocarbons (PAHs) and their derivatives. Fifteen PAHs are confirmed for carcinogenicity, a number of which are found in diesel exhaust (NTP 2005b). The chemical composition and particle sizes of diesel PM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), expected load, engine emission controls, fuel formulations (high/low sulfur fuel), and the year of the engine (EPA 2002).
 - Cancer Health Effects: Human studies on the carcinogenicity of diesel particulate matter demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure (NTP 2005b). Several occupational and ambient studies have documented the health effects due to exposure to diesel PM. The California Office of Environmental Health Hazards Assessment (OEHHA), in its role in assessing risk from environmental factors reviews such studies and makes recommendations on the way environmental risk should be evaluated through programs like the AB2588 Hot Spot Program. In its comprehensive assessment of diesel exhaust, OEHHA analyzed more than 30 studies of people who worked around diesel equipment, including truck drivers, 1950's era railroad workers, and equipment operators. The studies showed these workers were more likely to develop lung cancer than workers who were not exposed to diesel emissions. These studies provided strong evidence that long-term occupational exposure to diesel exhaust increases the risk of lung cancer. However, all of these studies were based on exposure to exhaust from traditional diesel engines and prior to the advent of highly efficient emissions controls like the diesel particulate filter. Based on these studies, CARB identified diesel exhaust a toxic air contaminant in 1998.
 - More recently, in January 2015, a major new study evaluated the health impacts of “new technology diesel exhaust” (NTDE). Beginning in 2001, USEPA and CARB begin issuing a series of regulations that require new diesel-powered vehicles and equipment to use the latest emissions control technology. This technology relies on two components. The first is a diesel particulate filter, which is capable of reducing particulate matter emissions by over 90% (required for new engines beginning in 2007). The second technology is selective catalytic reduction, which reduces emissions of nitrogen oxides by over 90% (required for new engines beginning in 2010). Diesel emissions from engines equipped with this technology are referred to as NTDE. As a result of the advances in emission control technology, USEPA, CARB, and other government and industry stakeholders commissioned a series of studies called the Advanced Collaborative Emissions Study (ACES). ACES has been guided by an ACES Steering Committee consisting of representatives of HEI and the Coordinating Research Council (CRC: a nonprofit organization that directs engineering and environmental studies on the interaction between automotive or other mobility equipment and petroleum products), along with the U.S. Department of Energy, U.S. EPA, engine manufacturers, the

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petroleum industry, CARB, emission control manufacturers, the National Resources Defense Council, and others. The Health Effects Institute (HEI), funded in part by USEPA, was selected to oversee Phase 3 of ACES.

- Phase 3 of ACES evaluated whether emissions from new technology diesel engines cause cancer or other health effects. Specifically, it evaluated the health impacts of a 2007-compliant engine equipped with a diesel particulate filter. HEI found:
 - "Lifetime inhalation exposure of rats exposed to one of three levels of NTDE from a 2007-compliant engine, for 16 hours per day, 5 days a week, with use of a strenuous operating cycle that more accurately reflected the real-world operation of a modern engine than cycles used in previous studies, did not induce tumors or pre-cancerous changes in the lung and did not increase tumors that were considered to be related to NTDE in any other tissue. A few mild changes were seen in the lungs, consistent with long-term exposure to NO₂, a major component of NTDE, which is being further substantially reduced in 2010-compliant engines". (Page 1)
 - "Using appropriate statistical approaches to analyze the data from more than 100 endpoints in the broad areas of histology, serum chemistry, systemic and lung inflammation, and respiratory function, the investigators confirmed the a priori hypothesis, namely, that NTDE would not cause an increase in tumor formation or substantial toxic health effects in rats, although some biologic effects might occur". (Page 3)
 - "The overall conclusion was that chronic exposure of rats to NTDE did not produce tumors in the lung, in marked contrast to the effects of chronic exposure to TDE observed in multiple previous rat studies, in which lung tumors, as well as inflammation and the deposition of soot in the lung, were observed. Rather, the effects of NTDE in the lung more closely resembled changes noted after long-term exposures to gaseous oxidant pollutants, in particular NO₂, and to TDE from which particles have been filtered out. It is possible that components of NTDE other than NO₂ may have contributed to the effects reported, but the low levels of other components suggest that they would not be primarily responsible" (Page 3)
 - "Some mild histologic changes were found in the lung; however, these were not pre-cancerous lesions, previously described in long-term exposure studies of rats to TDE. Rather, the histologic changes — periacinar epithelial hyperplasia, bronchiolization, accumulation of macrophages, and periacinar interstitial fibrosis — were confined to a small region, the centriacinus, which is involved in gas exchange." (Page 3)
 - "The histologic changes in the lungs were consistent with previous findings in rats after long-term exposure to NO₂ — a major component of the exposure atmosphere, which is being substantially further reduced in 2010-compliant engines." (Page 4)
 - "The present findings strongly support the premise that advances in engine, fuel, and combustion technologies have substantially reduced the potential health impacts of DE and that estimates of hazard and risk based on laboratory or epidemiologic studies of the health impacts of TDE exposures most likely do not reflect either the hazards or the risks from NTDE". (Page 40)
 - "As shown, the ACES Phase I study (Khalek et al. 2009) found that emissions from 2007-compliant engines were reduced more than 90% compared with those from a 2004 engine; emissions of hydrocarbons and other air toxics by 2007-compliant engines were also lower by more than 80% than those of older engines" (Page 154)
- The HEI study clearly demonstrates that the application of new emissions control technology to diesel engines have virtually eliminated the health impacts of diesel exhaust.

- Non-Cancer Health Effects: Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and can cause coughs, headaches, light-headedness, and nausea. Diesel exhaust is a major source of ambient particulate matter pollution as well, and numerous studies have linked elevated particle levels in the air to increase hospital admission, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems (OEHHA 2002). The HEI study discussed above also evaluated non-cancer health effects. The study found NTDE would not cause an increase in substantial toxic health effects in rats, although some biologic effects might occur.
- Sources: Diesel exhaust.
- *Visibility-Reducing Particles*
 - Description and Physical Properties: Visibility-reducing particles (VRP) are suspended particulate matter that reduces visibility. Visibility is the distance through the air that can be seen without the use of instrumental assistance. The distance that can be seen is limited by the amount of gases and aerosol particles in the way. The EPA implemented a Regional Haze Rule in 1999 to attempt to protect visibility in 156 national parks and wilderness areas in the United States. The regulation requires states to establish goals for improving their areas and to work together with other states as the pollution is often transported over long distances (EPA 1999).
 - Health Effects: The human health effects of VRP are those of pollution (particulate matter, oxides of nitrogen, and sulfur dioxide) discussed above.
 - Sources: The sources are other pollutants (particulate matter, oxides of nitrogen, and sulfur dioxide) as discussed above.
- *Vinyl Chloride*
 - Description and Physical Properties: Vinyl chloride, or chloroethene, is a chlorinated hydrocarbon and colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products, including pipes, wire and cable coatings, and packaging materials. Vinyl chloride is formed when other substances such as trichloroethylene and tetrachloroethylene are broken down. This can occur when plastics containing these substances are left to decompose in solid waste landfills. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites due to microbial breakdown of chlorinated solvents. In 1978, the CARB established a State ambient air quality standard for vinyl chloride. The standard was set at 0.01 ppm for a 24-hour duration because that was the lowest level that could be detected at that time. In 1990, the CARB identified vinyl chloride as a toxic air contaminant and estimated a cancer unit risk factor.
 - Health Effects: Short-term exposure to high levels of vinyl chloride in air causes central nervous system effects, such as dizziness, drowsiness, and headaches (CARB 2005). Epidemiological studies of occupationally exposed workers have linked vinyl chloride exposure to development of a rare cancer, liver angiosarcoma, and have suggested a relationship between exposure and lung and brain cancers.
 - Sources: Manufacturing of PVC plastic and vinyl products.
- *Hydrogen Sulfide*
 - Description and Physical Properties: Hydrogen sulfide (H₂S) is a flammable, colorless, poisonous gas that smells like rotten eggs.
 - Health Effects: High levels of hydrogen sulfide can cause immediate respiratory arrest. It can irritate the eyes and respiratory tract and cause symptoms like headache, nausea, vomiting, and cough. Long exposure to hydrogen sulfide can cause pulmonary edema.
 - Sources: Hydrogen sulfide and other reduced sulfur compounds form by the anaerobic decomposition of manure some types of bacteria found in animal and human by-products

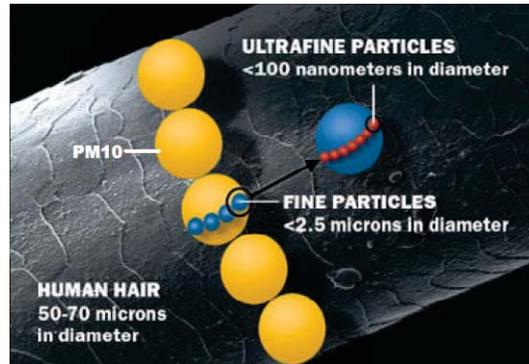
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produce hydrogen sulfide during reduction of sulfur-containing compounds, such as proteins. Manure, storage tanks, ponds, anaerobic lagoons, and land application sites are the primary sources of hydrogen sulfide emissions. Anthropogenic sources include the combustion of sulfur containing fuels (oil and coal) and organic matter that undergoes putrefaction. It is used in the production of heavy water for nuclear reactors, the manufacture of chemicals, in metallurgy, and as an analytical reagent.

- *Reactive Organic Gases and Volatile Organic Compounds*
 - Description and Physical Properties: Reactive organic gases (ROG), or volatile organic compounds (VOC), are defined as any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. ROG consist of nonmethane hydrocarbons and oxygenated hydrocarbons. Hydrocarbons are organic compounds that contain only hydrogen and carbon atoms. Nonmethane hydrocarbons are hydrocarbons that do not contain the unreactive hydrocarbon, methane. Oxygenated hydrocarbons are hydrocarbons with oxygenated functional groups attached.
 - It should be noted that there are no State or Federal ambient air quality standard for ROG because they are not classified as criteria pollutants. They are regulated, however, because a reduction in ROG emissions reduces certain chemical reactions that contribute to the formation of ozone. ROG are also transformed into organic aerosols in the atmosphere, which contribute to higher PM₁₀ and lower visibility.
 - Health Effects: Although health-based standards have not been established for ROG, health effects can occur from exposures to high concentrations because of interference with oxygen uptake. In general, concentrations of ROG are suspected to cause eye, nose, and throat irritation; headaches, loss of coordination, nausea, damage to liver, kidney, and the central nervous system (EPA 2005). There are many ROG that have been classified as toxic air contaminants. A particular ROG of concern is benzene, which is described in more detail below. The EPA maintains a list of all air substances that have been classified as hazardous to humans and/or animals, and includes ROG, pesticides, herbicides, and radionuclides (EPA 2006d).
 - Sources: The major sources of ROG are on-road motor vehicles and solvent evaporation.
- *Benzene*
 - Description and Physical Properties: Benzene is an ROG. It is a clear or colorless light-yellow, volatile, highly flammable liquid with a gasoline-like odor. The EPA has classified benzene as a “Group A” (human) carcinogen.
 - Health Effects: Short-term (acute) exposure of high doses from inhalation of benzene may cause dizziness, drowsiness, headaches, eye irritation, skin irritation, and respiratory tract irritation, and at higher levels, unconsciousness can occur. Long-term (chronic) occupational exposure of high dose by inhalation has caused blood disorders, including aplastic anemia and lower levels of red blood cells (EPA 1992). Occupational exposure to benzene has been shown to cause leukemia (mainly acute myelogenous leukemia) (NTP 2005). Studies have also found that benzene exposure increased the risks of lymphatic and hematopoietic cancer (cancers of lymphatic system and of organs and tissues involved in the production of blood), total leukemia, and specific histologic types of leukemia (NTP 2005).
 - Sources: Benzene is emitted into the air from gasoline services station (fuel evaporation), motor vehicle exhaust, tobacco smoke, and from burning oil and coal. Benzene is also used as a solvent for paints, inks, oils, waxes, plastic, and rubber. It is used in the extraction of oils from seeds and nuts. It is also manufactured for detergents, explosives, dyestuffs, and pharmaceuticals.

Ultrafine Particles. Ultrafine particles are particulate matter (PM) that exists in the ambient air and are less than 0.1 micrometer (μm or microns) in diameter. Ultrafine particles (UFP or $\text{PM}_{0.1}$) are included in the group called $\text{PM}_{2.5}$, particulate matter less than 2.5 micrometers in diameter.

The picture to the right displays the relative size of the particles compared with a human hair, with PM_{10} (particulate matter less than 10 micrometers in diameter) indicated as yellow circles, $\text{PM}_{2.5}$ shown as blue circles, and ultrafine particles shown as red circles.



The CARB or the EPA have not set an ambient air quality standard for ultrafine particles because health effect evidence and measurements are currently limited. In its recent revisions to the national ambient air quality standards for particulate matter, the EPA states, “In considering both the currently available health effects evidence and the air quality data, the Policy Assessment concluded that this information was still too limited to provide support for consideration of a distinct PM standard for ultrafine particles” (EPA 2013,¹ page 3122).

The EPA indicates that evidence and research regarding health effects from short-term and long-term exposure to ultrafine particles are still too limited to establish a standard for ultrafine particles. In addition, the EPA reports that the studies that do exist have reported inconsistent and mixed results. The following is an excerpt from the Federal Register illustrating this point:

“New evidence, primarily from controlled human exposure and toxicological studies, expands our understanding of cardiovascular and respiratory effects related to short-term ultrafine particle exposures. However, the Policy Assessment concluded that this evidence was still very limited and largely focused on exposure to diesel exhaust, for which the Integrated Science Assessment concluded it was unclear whether the effects observed are due to ultrafine particles, larger particles within the $\text{PM}_{2.5}$ mixture, or the gaseous components of diesel exhaust. In addition, the Integrated Science Assessment noted uncertainties associated with the controlled human exposure studies using concentrated ambient particle systems, which have been shown to modify the composition of ultrafine particles.

The Policy Assessment recognized that there are relatively few epidemiological studies that have examined potential cardiovascular and respiratory effects associated with short-term exposures to ultrafine particles. These studies have reported inconsistent and mixed results.

Collectively, in considering the body of scientific evidence available in this review, the Integrated Science Assessment concluded that the currently available evidence was suggestive of a causal relationship between short-term exposures to ultrafine particles and cardiovascular and respiratory effects. Furthermore, the Integrated Science Assessment concluded that evidence was inadequate to infer a causal relationship between short-term exposure to ultrafine particles and mortality as well as long-term exposure to ultrafine particles and all outcomes evaluated” (EPA 2013, page 3121).

The Integrated Science Assessment for Particulate Matter concluded that evidence is inadequate to determine a causal relationship between short-term exposures of ultrafine particles to mortality or

¹ U.S. Environmental Protection Agency. 2013. Federal Register. National Ambient Air Quality Standards for Particulate Matter. Website: <http://www.gpo.gov/fdsys/pkg/FR-2013-01-15/pdf/2012-30946.pdf>. Accessed December 17, 2013.

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central nervous system effects, but that the evidence is suggestive of short-term (24-hour) exposures causing cardiovascular and respiratory effects. The assessment also concluded that there is inadequate evidence linking long-term exposure (typically measured in terms of an annual concentration) of ultrafine particles to health effects, including respiratory, developmental, cancer, and mortality. Overall, epidemiological studies of atmospheric PM suggest that cardiovascular effects are associated with smaller particles, but there are few reports that make a clear link between ultrafine particle exposures and increased mortality. In January 2015, a new study¹ on the relationship of mortality to long-term exposure to fine and ultra-fine particles was released. The study found there was a relationship between mortality and both fine and ultra-fine particles exposure.

In its Quantitative Health Risk Assessment for Particulate Matter, the EPA did not assess ultrafine particles, stating “ that there was insufficient data to support a quantitative risk assessment for other size fractions (e.g., ultrafine particles).”²

The availability of measurements of ultrafine particles to support health studies is also limited:

With respect to our understanding of ambient ultrafine particle concentrations, at present, there is no national network of ultrafine particle samplers; thus, only episodic and/or site-specific data sets exist. Therefore, the Policy Assessment recognized a national characterization of concentrations, temporal and spatial patterns, and trends was not possible at this time, and the availability of ambient ultrafine measurements to support health studies was extremely limited. In general, measurements of ultrafine particles are highly dependent on monitor location and, therefore, more subject to exposure error than accumulation mode particles. Furthermore, the number of ultrafine particles generally decreases sharply downwind from sources, as ultrafine particles may grow into the accumulation mode by coagulation or condensation. Limited studies of ambient ultrafine particle measurements have suggested that these particles exhibit a high degree of spatial and temporal heterogeneity driven primarily by differences in nearby source characteristics. Internal combustion engines and, therefore, roadways are a notable source of ultrafine particles, so concentrations of these particles near roadways are generally expected to be elevated. Concentrations of ultrafine particles have been reported to drop off much more quickly with distance from roadways than fine particles (EPA 2013, page 3121).

In addition, it was hypothesized that chemical composition of PM may be a better predictor of health effects than particle size:

In addressing the issue of particle composition, the Integrated Science Assessment concluded that, '[f]rom a mechanistic perspective, it is highly plausible that the chemical composition of PM would be a better predictor of health effects than particle size.' Heterogeneity of ambient concentrations of PM_{2.5} constituents (e.g., elemental carbon, organic carbon, sulfates, nitrates) observed in different geographical regions as well as regional heterogeneity in PM_{2.5}-related health effects reported in a number of epidemiological studies are consistent with this hypothesis (EPA 2013, page 3122).

The SCAQMD's Multiple Air Toxics Exposure Study (MATES-IV) states, “the health impact caused by exposure to UFPs [ultrafine particles] is still not well-understood.” MATES-IV presents measurements of black carbon and ultrafine particles at 10 fixed sites within the Basin. The results indicate that the highest black carbon levels were at more urban sites located near major roadways. Black carbon was not measured in the previous MATES-III; however, elemental carbon levels decreased about 35

¹ Environmental Health Perspectives, January 2015. Associations of Mortality with Long-Term Exposures to Fine and Ultrafine Particles. Species and Sources: Results from the California Teachers Study Cohort.

² U.S. Environmental Protection Agency. 2010. Quantitative Health Risk Assessment for Particulate Matter. EPA-452/R-10-005. Website: <http://www.epa.gov/nscep/index.html>. (Search for the document.) Accessed December 20, 2013.

percent during from 2005 to 2012. Black carbon is a term used for elemental and graphitic components of soot.

The SCAQMD's 2012 Air Quality Management Plan (AQMP) contains a detailed chapter on near roadway exposure and ultrafine particles. The AQMP summarizes current health effect research on ultrafine particles. The potential health effects from ultrafine particle exposure are similar to those of PM_{2.5} and PM₁₀: such as adverse cardio-respiratory responses including elevated blood pressure, and mild inflammatory and prothrombotic (obstruction of circulation) responses. The AQMP indicated that future research and assessment is needed in the following areas:

- *Chemical Composition.* Chemical composition of ultrafine particles depends on many factors, including vehicle technology, fuel, and atmospheric chemical reactions after being emitted. Particle composition may be a factor determining particle toxicity; therefore, knowledge regarding the chemistry is important.
- *Formation.* More research is needed regarding the processes leading to ultrafine particle formation.
- *Standardized Measurement Methods and Procedures.* Currently, there is no standard method for conducting size-classified or particle-number measurements. Characteristics measured in ambient and emission-testing studies are highly dependent on the measurement instrument/protocol used and its setting.
- *Measurements at Hot Spot Locations.* More measurements should be taken at “hot spots” where large numbers of vehicles are operated.
- *Emissions Inventories.* Vehicle emission factors for different particle size ranges and for particle numbers are highly uncertain, and there are no emission inventories for ultrafine particles from motor vehicles. New estimations of ultrafine particle levels should not be derived solely from vehicle emission factors (i.e., EMFAC), but have to include predictions for formation near the tailpipe and in the atmosphere.
- *Air Quality Modeling.* Modeling tools will need to be developed to simulate the formation and transport over a wide range of atmospheric conditions and emissions scenarios. The dispersion near the first few hundred meters of the roadway needs to be better understood.
- *Health Effects.* New toxicological and epidemiological studies targeting exposure to controlled and uncontrolled emissions from gasoline and diesel vehicles are needed to better characterize the exposure-response relationships to ultrafine particles and to help develop health guidelines and potential regulations. The health effects of inorganic ultrafine particle emissions from vehicles are only now starting to receive significant attention.
- *Other Sources.* More work is needed to better understand size, composition, and health impact of particles near stationary sources and other processes (rather than just motor vehicles).

Children and Air Pollution. Numerous studies have shown strong links between air pollution exposures and a range of health outcomes. One particular study was carried out over a 10-year experimental time period by the University of Southern California, the Children's Health Study (Gaulderman, 2000)¹. The Children's Health Study, which began in 1992, is a large, long-term, study of the effects of chronic air pollution exposures on the health of children living in Southern California. Children may be more strongly affected by air pollution because their lungs and their bodies are still developing. Children are also exposed to more air pollution than adults since they breathe faster and spend more time outdoors in strenuous activities. About 5,500 children in twelve communities were

¹ Gaulderman, W, et. al. Peters: Association between Air Pollution and Lung Function Growth in Southern California Children. American Journal of Respiratory and Critical Medicine. Vol 162. Page 1383. 2000. Accessed October 22, 2013.

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enrolled in the study; two-thirds of them were enrolled as fourth-graders. Data on the children's health, their exposures to air pollution, and many factors that affected their responses to air pollution were gathered annually until they graduated from high school. The major conclusions reached in the University of Southern California's Children's Health Study are shown below. Note however, that the conclusions provided below were developed based on measurements made in the 1990's when levels of air pollution in the Basin were substantially higher than current levels as shown earlier in Figures 4.3.1 to 4.3.6 and as noted further in Section 4.3.1.4 below and new technology diesel vehicles had not yet been introduced.

- Children exposed to higher levels of particulate matter, nitrogen dioxide, acid vapor and elemental carbon, had significantly lower lung function at age 18, an age when the lungs are nearly mature and lung function deficits are unlikely to be reversed.
- Children who were exposed to current levels of air pollution had significantly reduced lung growth and development when exposed to higher levels of acid vapor, ozone, nitrogen dioxide, and particulate matter, which is made up of very small particles that can be breathed deeply into the lungs.
- Children living in communities with higher concentrations of nitrogen dioxide, particulate matter, and acid vapor had lungs that both developed and grew more slowly and were less able to move air through them. This decreased lung development may have permanent adverse effects in adulthood.
- Children who moved away from study communities had increased lung development if the new communities had lower particulate matter levels, and had decreased lung development if the new communities had higher particulate matter levels.
- Days with higher ozone levels resulted in significantly higher school absences due to respiratory illness. Children with asthma who were exposed to higher concentrations of particulate matter were much more likely to develop bronchitis.
- In the most recent update to the Children's Health Study, researchers discovered that improvements in regional air quality contributed to improved children's lung function. Specifically, combined exposure to two harmful pollutants, nitrogen dioxide (NO₂) and fine particulate matter, fell approximately 40 percent for children in the third study group (2007-2011) compared to the first study group (1994-98). The study followed children from Long Beach, Mira Loma, Riverside, San Dimas and Upland.
- Children's lungs grew faster as air quality improved. Lung growth from age 11 to 15 was more than 10 percent greater for children breathing the lower levels of NO₂ from 2007 to 2011 compared to those breathing higher levels from 1994 to 1998.
- The percentage of children in the study with abnormally low lung function at age 15 dropped from nearly 8 percent for the 1994-98 group, to 6.3 percent in 1997-2001, to just 3.6 percent for children followed between 2007 and 2011.

4.3.1.3 Air Pollution Constituents and Attainment Status

The CARB has many responsibilities with respect to air quality, including the following:

- Coordination and oversight of State and Federal air pollution control programs in California;
- Oversight activities of local air quality management agencies (e.g., the SCAQMD);
- Responsibility for incorporating air quality management plans for local air basins into a State Implementation Plan (SIP) for EPA approval; and

- Maintaining air quality monitoring stations throughout the State in conjunction with local air districts.

The CARB has divided the State into 15 air basins based on meteorological and topographical factors that affect air pollution. An air basin generally has similar meteorological and geographic conditions throughout. The CARB and EPA use the data collected at monitoring stations to classify air basins as attainment, nonattainment, nonattainment transitional, or unclassified, based on air quality data for the most recent three calendar years compared with the AAQS. Nonattainment areas are imposed with additional restrictions, as required by the EPA to attain and maintain air quality standards. The air quality data are also used to monitor progress in attaining and maintaining air quality standards.

Significant authority for air quality control within the various air basins has been given to local air districts that regulate stationary source emissions and develop local nonattainment plans. Table 4.3.D identifies the attainment status¹ for the criteria pollutants in the Basin. The State AAQS are more stringent than the Federal AAQS.

Table 4.3.D: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
O ₃ 1-hour	Nonattainment	N/A
O ₃ 8-hour	Nonattainment	Extreme Nonattainment
PM ₁₀	Nonattainment	Maintenance – serious (San Bernardino County is in nonattainment)
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO ₂	Attainment	Attainment/Maintenance
SO ₂	Attainment	Attainment
Pb	Attainment	Attainment
All others	Attainment/Unclassified	Attainment/Unclassified

Unclassified designation: a pollutant that is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.

Attainment designation: a pollutant is designated attainment if the State standard for that pollutant was not violated at any site in the area during a 3-year period.

Nonattainment: a pollutant is designated nonattainment if there was at least one violation at any site in the area during a 3-year period.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment*, 2015

4.3.1.4 Regional Air Quality Improvements

The SCAQMD website (aqmd.gov) includes historical air quality data dating back to 1994; the year after air pollution emissions thresholds were established. As described on the SCAQMD website,² in 1994 pollutant concentrations in the Basin exceeded three of the six Federal ambient air quality standards. The state sulfate standard was exceeded in some Basin areas. The state lead standard was exceeded in one localized area immediately adjacent to a source of lead emissions. No areas of the Basin exceeded standards for nitrogen dioxide or sulfur dioxide. The Los Angeles and Riverside County areas of the Southeast Desert Air Basin (SEDAB) served by the District exceeded standards

¹ Unclassified designation: a pollutant that is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment; Attainment designation: a pollutant is designated attainment if the State standard for that pollutant was not violated at any site in the area during a 3-year period. Nonattainment: a pollutant is designated nonattainment if there was at least one violation at any site in the area during a 3-year period.

² Historical Air Quality, Summary of 1994 Air Quality, <http://aqmd.gov/smog/AirQualityStandardsComplianceReport/AirQualitySummary94.html>, website accessed December 17, 2012.

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for ozone and PM₁₀. No other standards were exceeded in the District SEDAB areas. The Federal standards were exceeded at one or more locations in the Basin during 142 days in 1994.

Although both Federal and State standards were exceeded for three criteria pollutants during 1994, current air quality represents substantial improvement over historical air quality. Between 1982–1984 and 1992–1994, the number of days on which the Federal ozone standard was exceeded dropped by one third, from 33 percent to 22 percent of days, in the East San Gabriel Valley area, which is exceeded most frequently. Exceedances of the Federal carbon monoxide standard decreased from 11 percent of days in 1982–1984 to 7 percent of days in 1992–1994. A comparison for the same periods cannot be made for PM₁₀ since the first full year of monitoring was 1985. However, between 1985–1987 and 1992–1994, the percent of days exceeding the Federal 24-hour standard decreased from 13 percent to 3 percent.¹

Exceedances of the State nitrogen dioxide standard decreased from 1 percent of days in 1982–1984 to 0.1 percent of days in 1992–1994. The Federal nitrogen dioxide standard has not been exceeded in any area since 1991. There have been no exceedances of lead standards at regular air monitoring stations in the Basin since 1982. The State and Federal sulfur dioxide standards were not exceeded in any of the Basin monitoring areas during either period. Exceedances of the State sulfate standard decreased from 2 percent to 0 percent at the long-term site used in this analysis, though a few sites were exceeded in 1994. The areas of the Basin recording the highest pollutant concentrations have shown a significant decrease in exceedances of the Federal standards over the past decade.

As described in the SCAQMD *December 2000 Air Quality Standards Report*, in a continuing trend of significant long-term improvement in air quality, the Basin did not experience a Stage 1 Episode for the second year in a row in the year 2000. Also, the year 2000 was the second year in the history of ambient air monitoring that the Basin was not the location recording the highest ozone concentration in the nation. Nonetheless, maximum pollutant concentrations in the region still exceed the Federal standards for ozone, carbon monoxide and particulate matter (PM₁₀ and PM_{2.5}) by a wide margin.

Maximum 1-hour average and 8-hour average ozone concentrations in 2000 (0.184 ppm and 0.159 ppm) were 147 percent and 187 percent of the Federal 1-hour and 8-hour standards, respectively. The highest 8-hour average carbon monoxide concentration of 2000 (10.0 ppm) was 105 percent of the Federal standard. Maximum 24-hour average and annual average PM₁₀ concentrations (139 µg/m³ and 60.1 µg/m³) were 92 percent and 119 percent of the Federal 24-hour and annual standards, respectively. Maximum 24-hour average and annual average PM_{2.5} concentrations (119.6 µg/m³ and 28.2 µg/m³) were, respectively, 183 percent and 182 percent of the Federal 24-hour and annual standards.

In 2000, the Federal nitrogen dioxide standard was not exceeded, with a maximum concentration (0.0435 ppm), which was 81 percent of the Federal standard. The maximum 1-hour average nitrogen dioxide concentration (0.21 ppm) was 81 percent of the State standard. State standard for sulfate was exceeded on one day at one location. The maximum 24-hour concentration (26.7 µg/m³) was 107 percent of the State standard. (There is no Federal sulfate standard.) Sulfur dioxide and lead concentrations continued to remain well below the Federal and State standards in 2000.²

As identified in the SCAQMD *December 2000 Air Quality Standards Report*, the number of exceedances recorded in 2000 shows that air quality trends through 2000 are consistent with a continuation of the downtrends reported in previous years. Figure 4.3.8 shows the trend in the percentage exceeding the Federal standards in the Basin. In 2000, there were 43 days on which one or more Federal standards were exceeded somewhere in the Basin, most of which (40 days) were for

¹ Air Quality Trends Through 1994, http://aqmd.gov/smog/trends_8494.html, website accessed May 9, 2012.

² *December 2000 Air Quality Standards Compliance Report*, SCAQMD, <http://aqmd.gov/smog/AQSCR2000/aq00web.pdf>, website accessed December 17, 2012.

ozone alone. Between 1976–1978 and 1998–2000, the three-year average number of days exceeding any of the Federal standards for 1-hour ozone, 8-hour carbon monoxide or 24-hour PM₁₀ in the Basin was reduced by 80 percent. (“All Standards” does not include PM₁₀ until 1985.) The three-year average number of days exceeding the carbon monoxide Federal standard was reduced by 94 percent for the same period. The number of sampling days exceeding the Federal 24-hour PM₁₀ standard decreased 93 percent between 1985–1987 and 1998–2000. (Three-year averages were used to minimize the effect of year-to-year variations due to changes in meteorological conditions.)

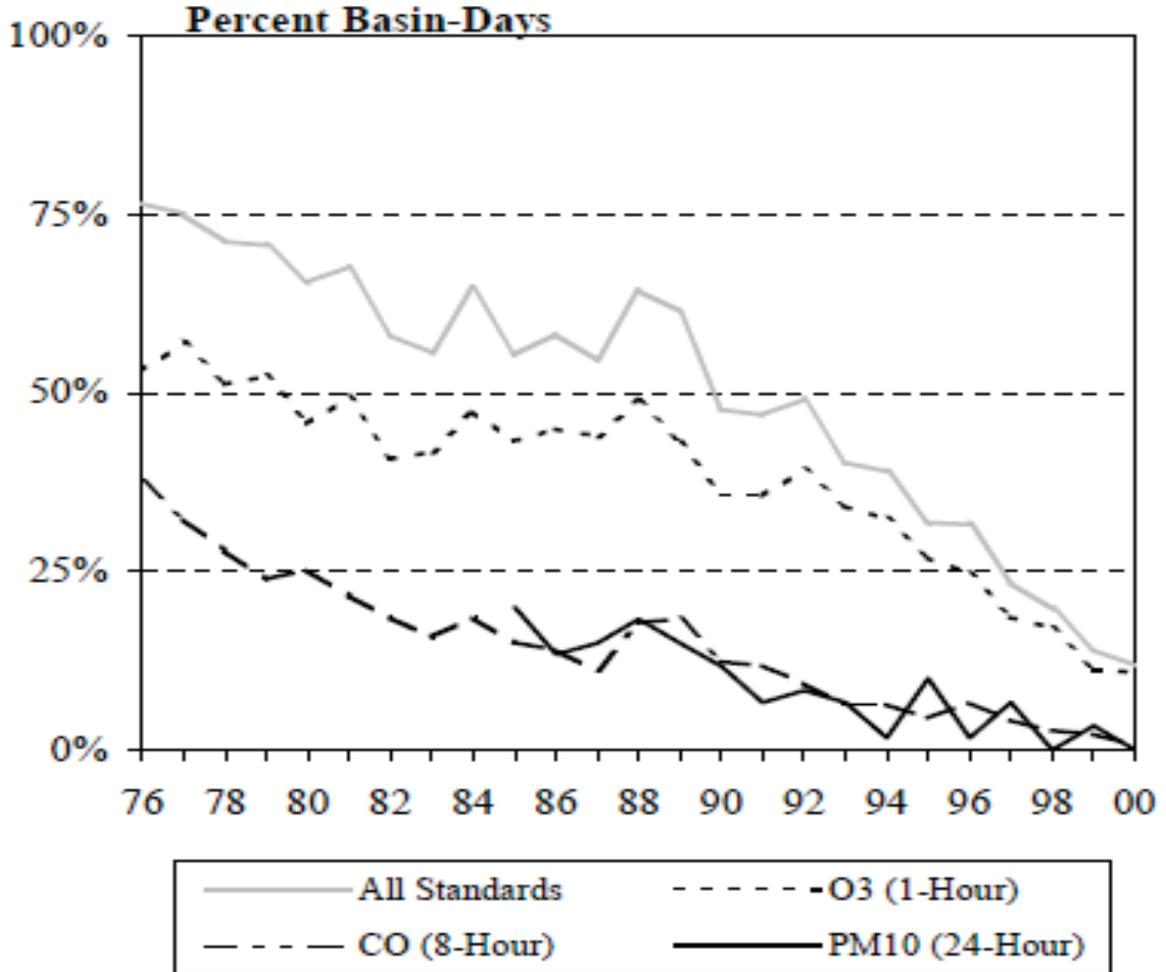


Figure 4.3.8: Percent of Days Basin Exceeds Federal AAQS

Between the periods 1976–1978 and 1998–2000, Stage 1 Episodes decreased 96 percent and health advisories decreased 86 percent. Exceedances of 1-hour and 8-hour Federal standards decreased 76 percent and 47 percent, and State standard exceedances decreased 49 percent as shown in Figure 4.3.9.

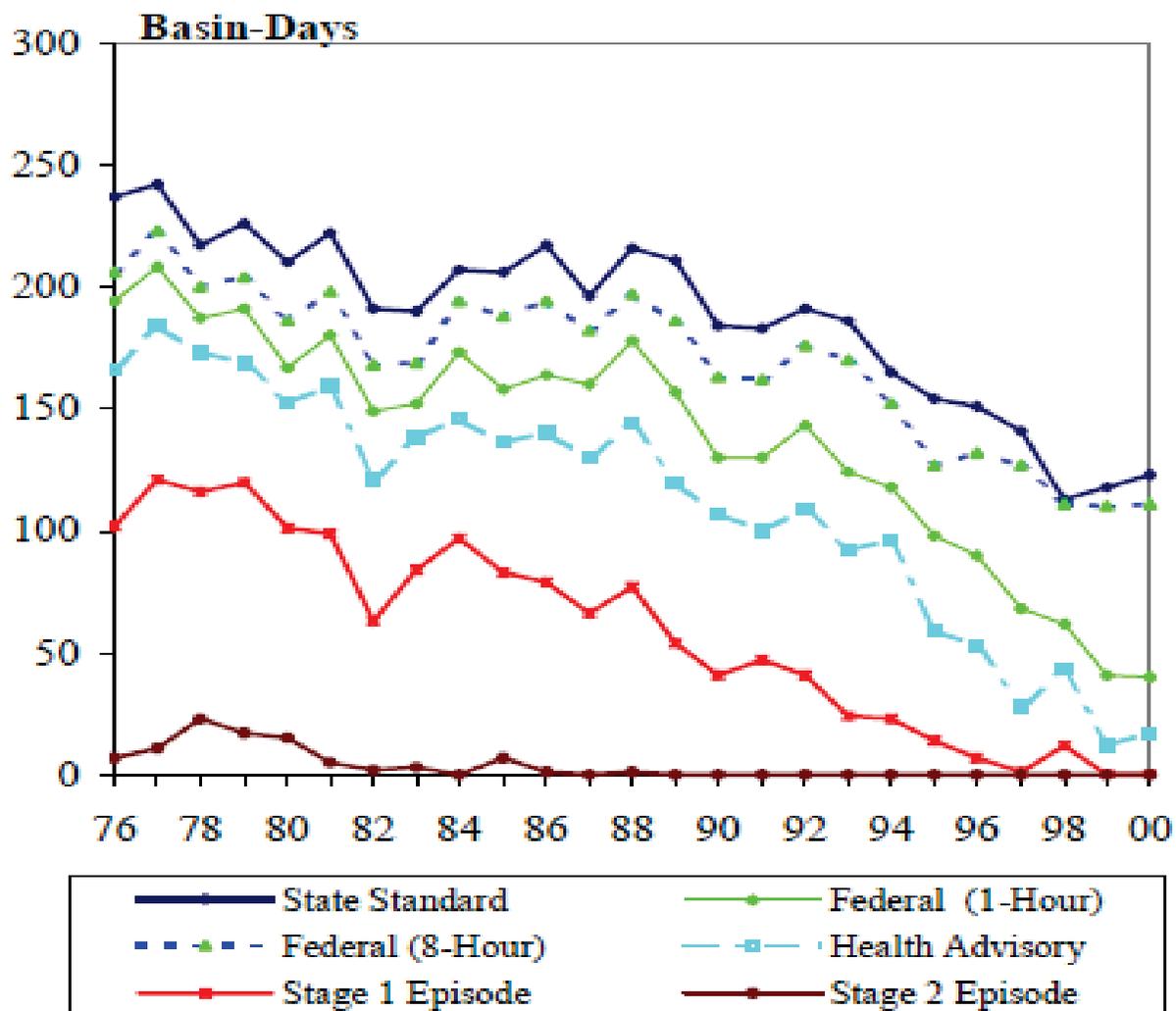
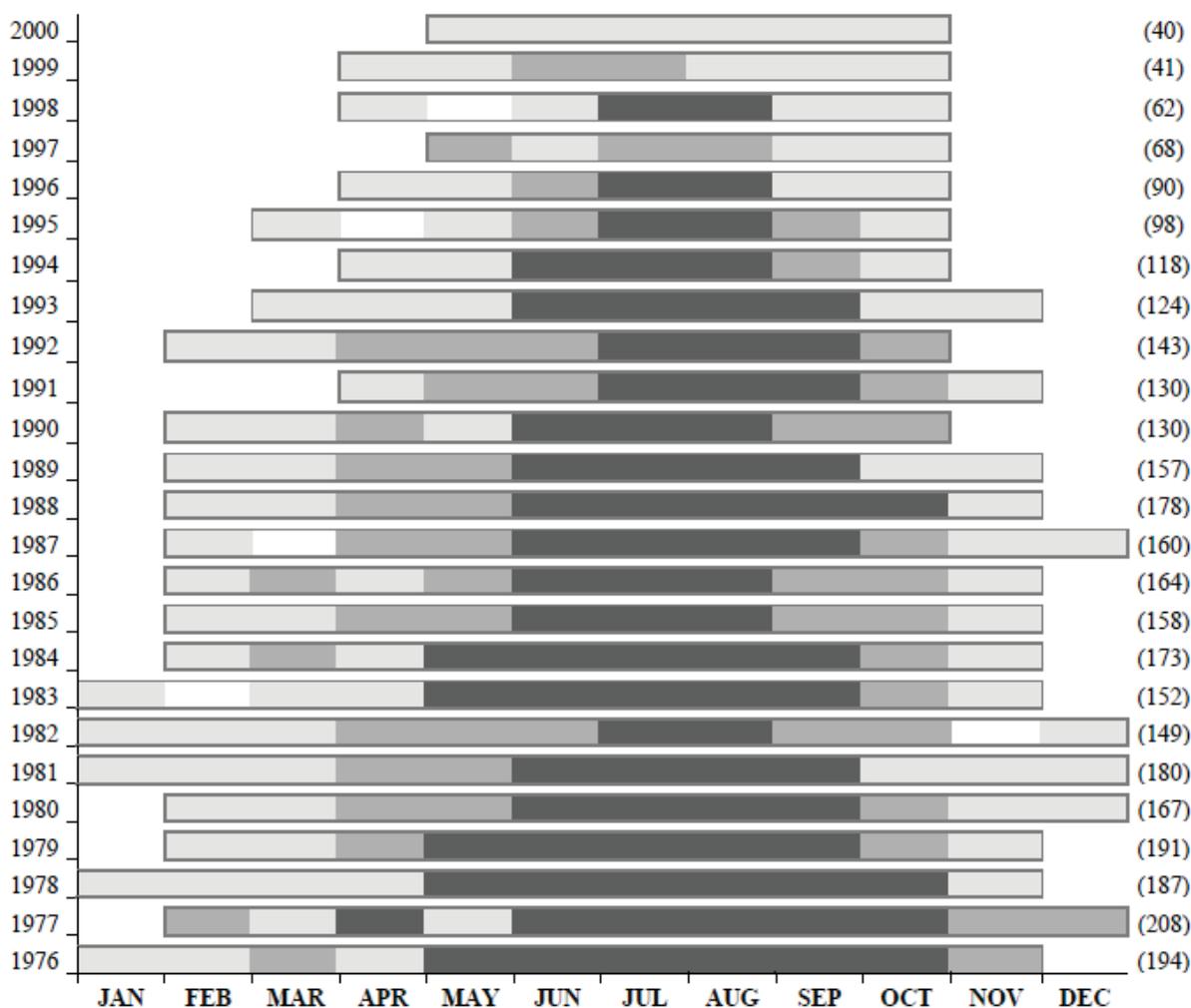


Figure 4.3.9: Exceedances of 1-Hour and 8-Hour Federal Standards

Figure 4.3.10 shows the number of days per month exceeding the Federal ozone standard for the period of 1976–2000. Up until the early 1990s, it was common to have days exceeding the Federal ozone standard as early as February and as late as November and December. Since the mid-1990s there have been no Federal standard exceedances recorded in the months of January–March and November–December. Also, the frequency of exceedances in fall (September and October) has been reduced significantly in recent years.



* Number of Days:

0	1-10	11-20	21-31
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 (Total Basin-Days)

Figure 4.3.10: Number of Days per Month Federal Ozone Standard Exceeded, 1976–2000

The monthly distribution of the Federal ozone standard exceedances shows the trend toward shorter duration of the period of the year that high ozone concentrations occur (smog season). Although weather conditions contributed to the lower ozone concentrations, weather-adjusted trend studies have indicated that the significant downtrend in ozone concentration and shorter smog season in the Basin are mainly attributed to emission reduction and reduced reactivity of emitted organic compounds in the region.

As described in the SCAQMD *November/December 2006 Air Quality Standards Report*, the maximum 8-hour and 1-hour average ozone concentrations in the Basin (0.142 ppm and 0.175 ppm, recorded in the Central San Bernardino Mountains and East San Gabriel Valley areas) were 167 percent and 140 percent of the 8-hour and former 1-hour Federal standards, respectively. Maximum 24-hour average and annual average PM₁₀ concentrations in the Basin (142 µg/m³ and 64.0 µg/m³, recorded in the Central San Bernardino Valley and Metropolitan Riverside County areas) were 94 percent of the Federal 24-hour standard and 125 percent of the former annual PM₁₀ standards. Maximum 24-hour average PM_{2.5} concentration (72.2 µg/m³ recorded in the South San Gabriel Valley

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area) was 203 percent of the new Federal 24-hour standard (35 $\mu\text{g}/\text{m}^3$) and 110 percent of the former standard (65 $\mu\text{g}/\text{m}^3$). Maximum annual average $\text{PM}_{2.5}$ concentration (20.6 $\mu\text{g}/\text{m}^3$ recorded in the Metropolitan Riverside County area) was 136 percent of the Federal annual $\text{PM}_{2.5}$ standard.

Nitrogen dioxide maximum annual average concentration (0.031 ppm recorded in the Northwest San Bernardino Valley area) was 58 percent of the Federal standard. (The annual average concentration was 103% of the proposed new annual State standard for NO_2 .) Carbon monoxide concentrations have not exceeded the standards in the Basin since 2002. The highest 8-hour average carbon monoxide concentration in 2006 (6.4 ppm, recorded in the South Central Los Angeles County area) was 70 percent of the Federal standard. Sulfur dioxide, sulfate and lead concentrations remained well below the State and Federal standards in 2006.¹

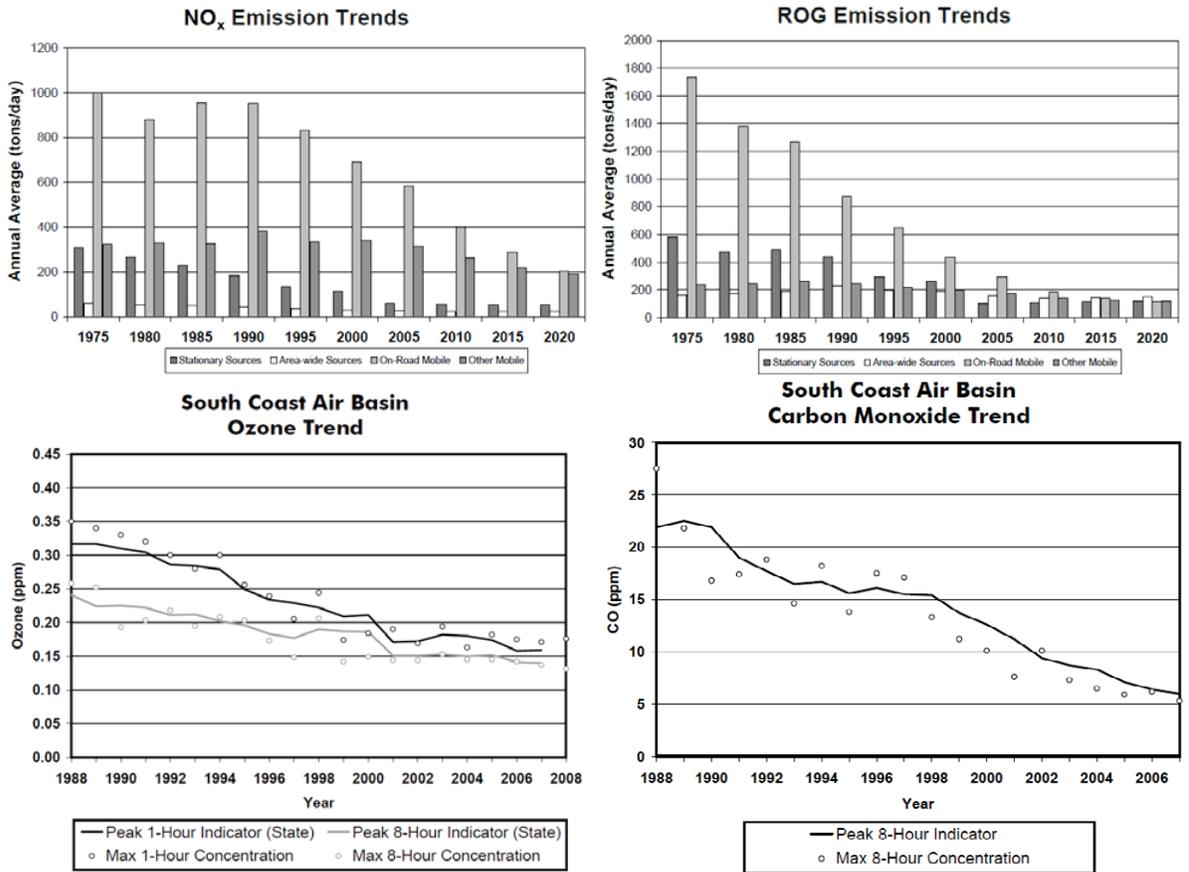
The American Lung Association website (lung.org) includes data collected from State air quality monitors that are used to compile an annual *State of the Air* report. These reports have been published over the last 13 years. The latest *State of the Air Report* compiled for the Basin was in 2010.² As noted in this report, air quality in the Basin has significantly improved in terms of both pollution levels and high pollution days over the past three decades. The area's average number of high ozone days dropped from 189.5 day per year in the initial 2000 State of the Air report (1996–1998) to 141.8 in the 2006–2008 report. The region has seen dramatic reduction in particle pollution since the initial State of the Air report (2000). While the 2010 *State of the Air Report* shows a slight uptick in the number of days of unhealthy air for ozone and annual particle pollution since the 2009 report, it is important to note that pollution levels measured in this latter report were affected by fluctuations in weather conditions in 2010 and the addition of several new particulate monitoring stations in areas in San Bernardino known to be particularly problematic for particulate matter given local conditions.

The 2012 Air Quality Management Plan states, “The remarkable historical improvement in air quality since the 1970s is the direct result of Southern California’s comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs” (South Coast Air Quality Management District 2012). As shown in Figure 4.3.11, ozone, NO_x , VOC, and CO have been decreasing in the Basin since 1975 and are projected to continue to decrease through 2020 (CARB 2009). These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicle miles traveled in the Basin continue to increase, NO_x and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_x emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy.

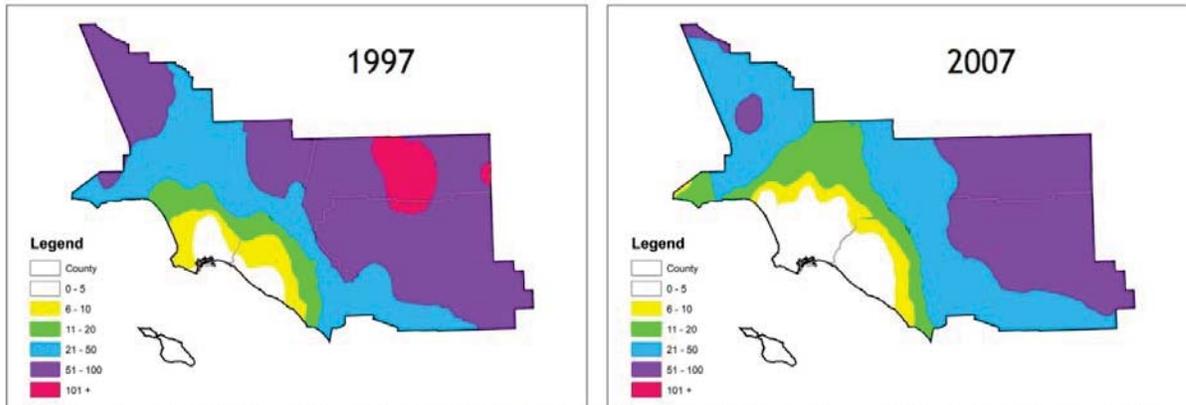
Figure 4.3.11 also displays ozone contour maps, which show that the number of days exceeding the national 8-hour standard has decreased between 1997 and 2007. In the 2007 period, there was an overall decrease in exceedance days compared with the 1997 period.

¹ November/December 2006 Air Quality Compliance Report, SCAQMD, http://aqmd.gov/smog/AQSCR2006/2006_AirQuality.pdf, website accessed December 17, 2012.

² State of the Air 2010 South Coast Air Basin, American Lung Association, <http://www.lung.org/associations/states/california/assets/pdfs/sota/south-coast-fact-sheet.pdf>, website accessed December 17, 2012.



Ozone Contour Maps – 3 year Average of National 8-hour Exceedance Days

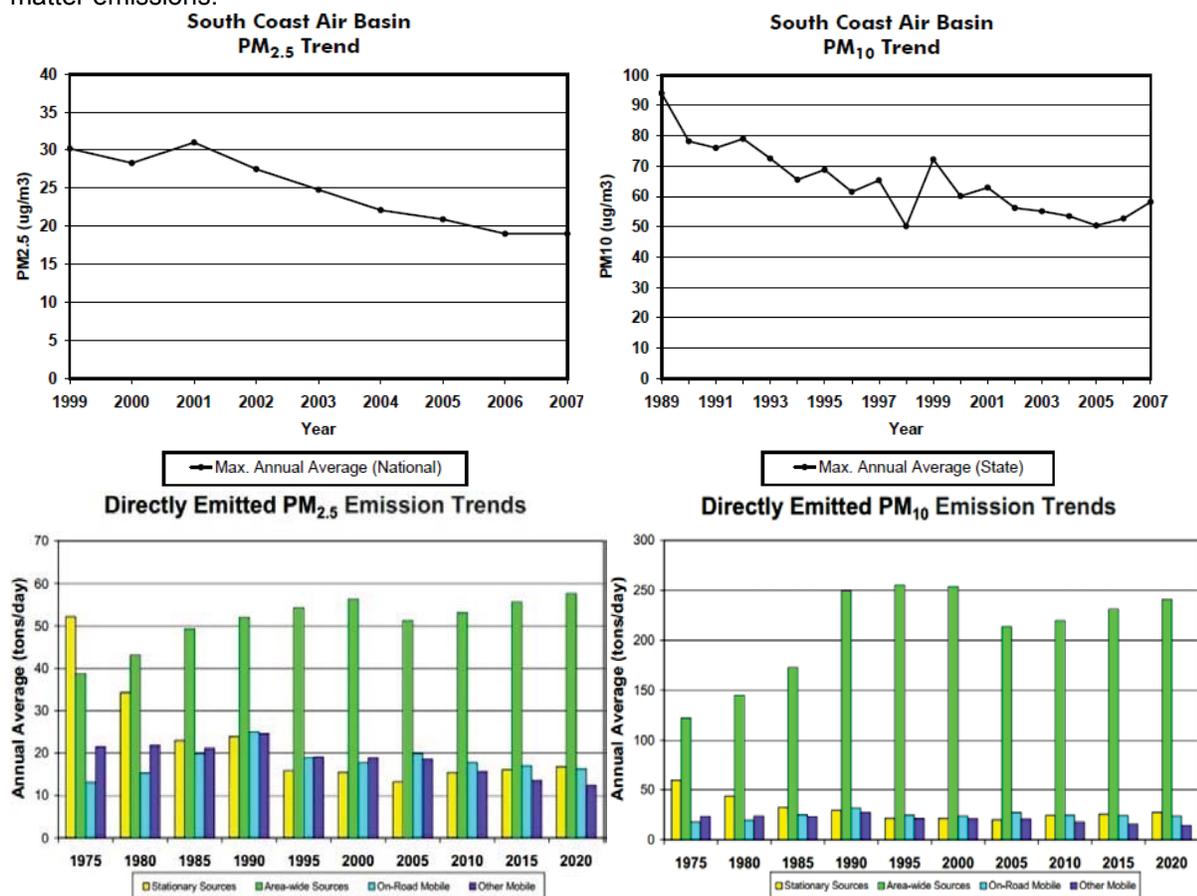


NOTE: Values used in these maps are for long-term sites only. Long-term sites are used to more accurately represent a trend over a period, by comparing the same or similar sites over a long period.
Note: ROG (reactive organic gases) and VOC (volatile organic compounds) are used interchangeably in this analysis.
Source: CARB, California Almanac of Emissions and Air Quality, 2009 Edition.

Figure 4.3.11: NO_x, VOC, CO, and Ozone Trends in the South Coast Air Basin

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As shown in the top portion of Figure 4.3.12, the overall trends of PM₁₀ and PM_{2.5} in the air (not emissions) show an overall improvement since 1975. As shown in the bottom portion of Figure 4.3.12, direct emissions of PM₁₀ have remained somewhat constant in the Basin and direct emissions of PM_{2.5} have decreased slightly since 1975. Area-wide sources (fugitive dust from roads, dust from construction and demolition, and other sources) contribute the greatest amount of direct particulate matter emissions.



Source: CARB, California Almanac of Emissions and Air Quality, 2009 Edition.

Figure 4.3.12: Particulate Matter Trends in the South Coast Air Basin

The reduction in air pollution levels experienced in the Basin is attributable to multiple factors. First, Federal and State regulatory strategies requiring the use of cleaner fuels and use of emissions control technology in the transportation and energy production industries have proven to greatly reduce the amount of tailpipe emission (vehicles) and point source (power plants) pollutants (e.g., NO_x and ROG). Second, the SCAQMD's rules and regulatory programs have proven to be instrumental in improving the air quality in the Basin. As an example, the SCAQMD has adopted multiple rules regarding fugitive dust (PM₁₀ and PM_{2.5}) and construction emissions that have resulted in reduced emission levels. Third, the SCAQMD's creation of the 1993 CEQA review handbook has resulted in lead agencies throughout the air basin employing uniform CEQA analyses and methodologies. The use of uniform CEQA review has allowed the SCAQMD and lead agencies that rely on the 1993 SCAQMD Air Quality Handbook to perform CEQA analysis to better track progress and to employ uniform mitigation and design feature strategies. Fourth, the use of the SCAQMD thresholds of significance to determine a project's direct and cumulative impact has allowed the SCAQMD to make tremendous progress toward achieving air quality attainment. The discussion above (pertaining to the air quality improvements achieved over the past 20 years) demonstrates that

the SCAQMD's rules and procedures, including the uniform utilization of the thresholds of significance recommended in the SCAQMD *CEQA Air Quality Handbook* are contributing toward the achievement of improved air quality in the Basin.

It is for this reason that this EIR and the City have chosen to rely on the thresholds of significance established by the SCAQMD in its 1993 CEQA Handbook and subsequent additions to the Handbook. These thresholds of significance (which serve as both direct and cumulative thresholds) have been uniformly utilized by lead agencies throughout the Basin for the past 20 years and the improvement of air quality within the Basin throughout this time period has demonstrated the efficacy of these thresholds, along with the other regional and statewide regional programs discussed above, in improving air quality throughout the Basin.

4.3.1.5 Local Air Quality

The SCAQMD, together with the CARB, maintains ambient air quality monitoring stations in the Basin. The air quality monitoring station most representative of the project site are the Riverside-Magnolia and Riverside-Rubidoux stations. These stations monitor CO, SO₂, NO₂, O₃, PM₁₀, and PM_{2.5}. Some monitoring data for SO₂ has been omitted as attainment is regularly met for this pollutant within the Basin. These stations characterize the air quality representative of the ambient air quality in the project area. The ambient air quality data in Table 4.3.E identify that CO and NO₂ levels are consistently below the relevant State and Federal standards in the project vicinity. O₃, PM₁₀, and PM_{2.5} levels all exceed State and/or Federal standards regularly. Figure 4.3.13 identifies the locations of the monitoring stations relative to the proposed project site.

4.3.1.6 Sensitive Land Uses in the Project Vicinity

Sensitive receptors include residences, schools, medical offices, convalescent facilities, and similar uses where people sensitive to air pollutants may be located (i.e., the ill, elderly, pregnant women, and children). There are currently seven occupied single-family homes and associated ranch/farm buildings in various locations on the proposed project site. These residences are existing on-site sensitive receptors. The nearest off-site existing sensitive receptors in the vicinity of the proposed project site are the residences located along Bay Avenue, Merwin Street, west of Redlands Boulevard, and scattered residences along Gilman Springs Road north of Alessandro Boulevard. Nearby sensitive land uses are depicted in Figure 4.3.14.

4.3.1.7 Existing Project Area Emissions

The project area is largely vacant undeveloped marginal agricultural land, with seven occupied single-family homes and associated ranch/farm buildings in various locations on the property. Much of the site is currently used for dry farming. San Diego Gas & Electric (SDG&E) operates a natural gas compressor plant, known as the Moreno Compressor Station, on 19 acres in the south-central portion of the site. The Southern California Gas Company (SCGC) also operates a metering and pipe cleaning station on two separate parcels (totaling 1.5 acres) in the south-central portion of the site south of Alessandro Boulevard along existing Virginia Street. Existing air quality conditions at the proposed project site reflect ambient¹ monitored conditions as presented in Table 4.3.E.

¹ Ambient: of or related to the immediate surroundings of something; in this context it means "in the air"

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Table 4.3.E: Ambient Air Quality Monitored in the Project Vicinity

Pollutant	Standard	2009	2010	2011	2012
Carbon Monoxide (CO)					
Maximum 1-hr concentration (ppm)		2.64	2.63	ND	ND
Number of days exceeded:	State: > 20 ppm	0	0	ND	0
	Federal: > 35 ppm	0	0	ND	0
Maximum 8-hr concentration (ppm)		1.85	1.84	1.35	1.59
Number of days exceeded:	State: ≥ 9.0 ppm	0	0	0	0
	Federal: ≥ 9 ppm	0	0	0	0
Ozone (O₃)					
Maximum 1-hr concentration (ppm)		0.116	0.128	0.128	0.126
Number of days exceeded:	State: > 0.09 ppm	25	31	52	27
Maximum 8-hr concentration (ppm)		0.101	0.099	0.115	0.102
Number of days exceeded:	State: > 0.070 ppm	57	74	92	70
	Federal: > 0.075 ppm	36	47	67	47
Coarse Particulates (PM₁₀)					
Maximum 24-hr concentration (µg/m ³)		86.8	75.0	82.7	82.6
Number of days exceeded:	State: > 50 µg/m ³	120	43	30	52
	Federal: > 150 µg/m ³	0	0	0	0
Annual arithmetic mean concentration (µg/m ³)		41.9	33.8	32.5	33.4
Exceeded for the year	State: > 20 µg/m ³	Yes	Yes	Yes	Yes
Fine Particulates (PM_{2.5})					
Maximum 24-hr concentration (µg/m ³)		62.0	58.5	73.7	39.9
Number of days exceeded:	Federal: > 35 µg/m ³	15	4	5	7
Annual arithmetic mean (µg/m ³)		17.1	13.9	13.8	13.6
Exceeded for the year	State: > 12 µg/m ³	Yes	Yes	Yes	Yes
	Federal: > 12.0 µg/m ³	Yes	Yes	Yes	Yes
Nitrogen Dioxide (NO₂)					
Maximum 1-hr concentration (ppm)		0.078	0.065	0.063	0.062
Number of days exceeded:	State: > 0.18 ppm	0	0	0	0
Annual arithmetic mean concentration (ppm)		0.017	0.017	0.017	0.016
Exceeded for the year	State: > 0.030 ppm	No	No	ID	ID
	Federal: > 0.053 ppm	No	No	ID	ID
Sulfur Dioxide (SO₂)					
Maximum 24-hr concentration (ppm)		0.003	0.005	0.001	ID
Number of days exceeded:	State: > 0.04 ppm	0	0	ND	ND
Annual arithmetic average concentration (ppm)		0.001	0.001	<0.001	ID
Exceeded for the year:	Federal: > 0.030 ppm	No	No	ND	ND

µg/m³ = micrograms per cubic meter
ID = Insufficient data
ppm = parts per million

EPA = United States Environmental Protection Agency
ND = No data

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment*, 2015

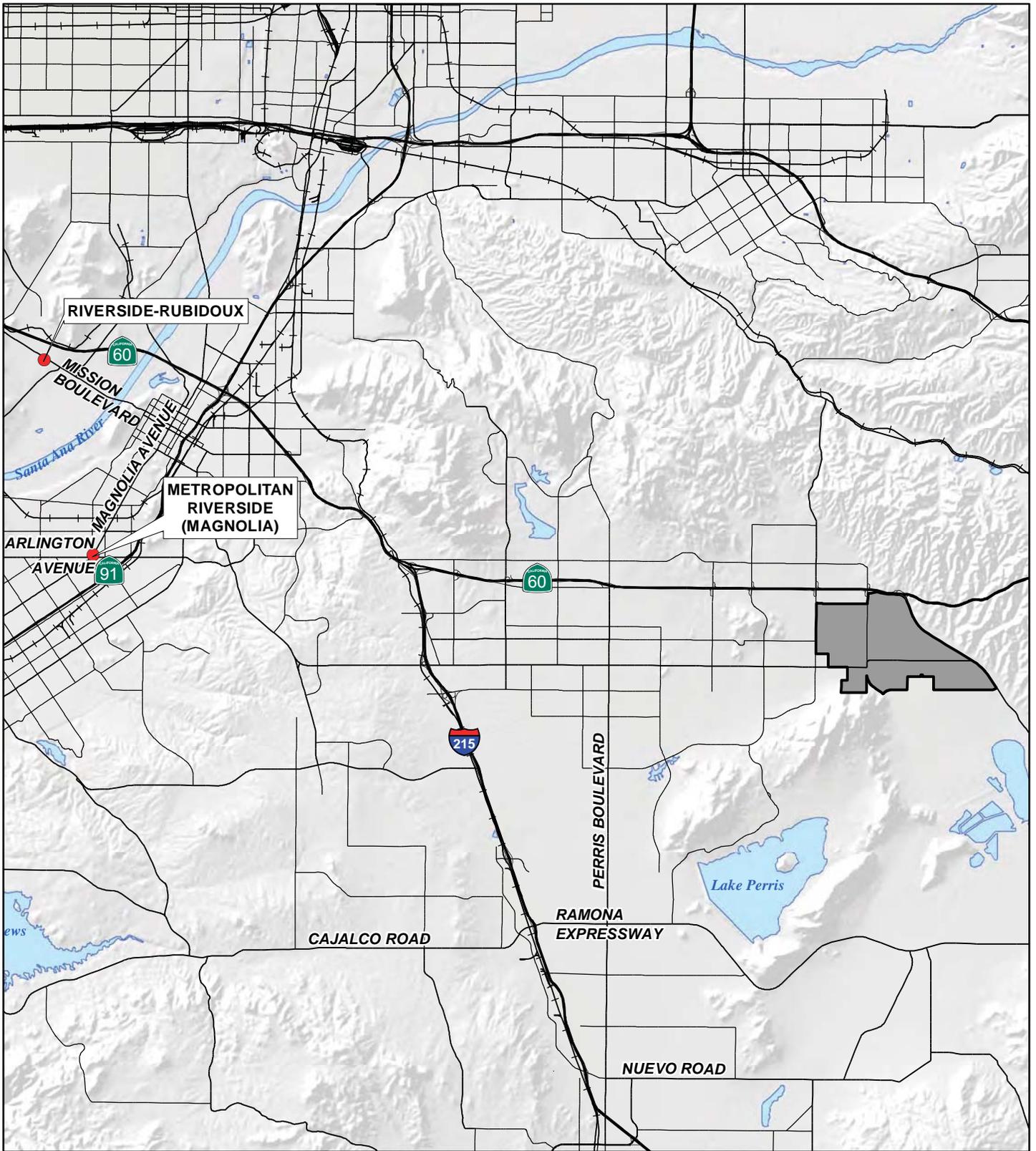
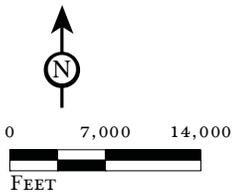


FIGURE 4.3.13

LSA



● Air Monitoring Location
NAME

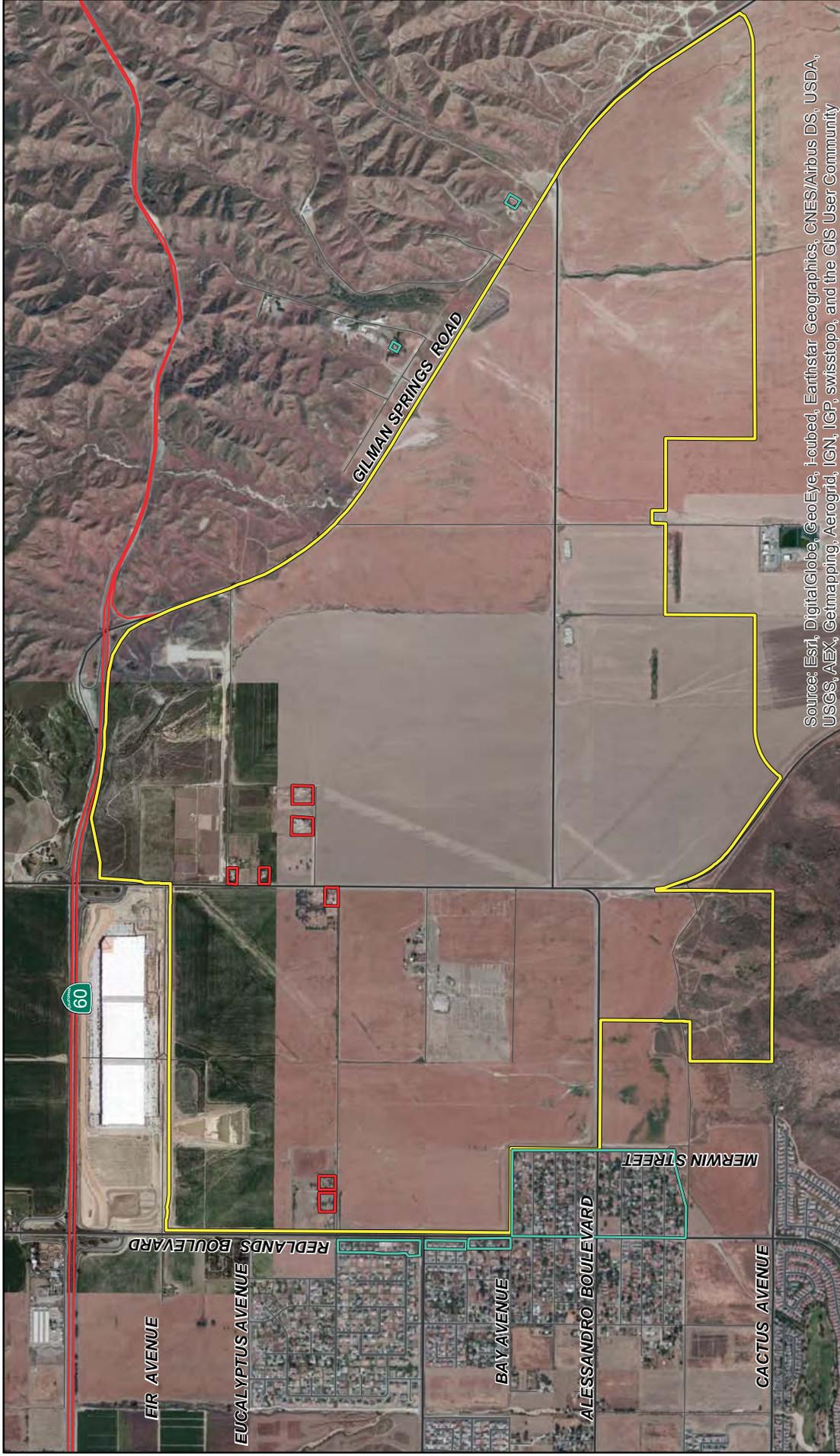
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Air Quality Monitoring Stations

SOURCE: USGS DEM; Thomas Bros, 2007; Air Resources Board, 2005

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LSA



- Specific Plan Boundary
- Off-site Sensitive Receptor
- On-site Sensitive Receptor

FIGURE 4.3.14

World Logistics Center Specific Plan Project

Existing Sensitive Receptors

SOURCE: ESRI, World Imagery 2010; Google Earth, 2011; Albert A Webb, Assoc., 2014.

I:\HFV1201\Reports\EIR\fig4-3-14_ExistSensReceptors.mxd (2/24/2014)

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

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4.3.2 Policies and Regulations

4.3.2.1 Federal Regulations

Clean Air Act. Pursuant to the Federal Clean Air Act (CAA) of 1970, the EPA established national ambient air quality standards (NAAQS). The NAAQS were established for six major pollutants, termed “criteria” pollutants. Criteria pollutants are defined as those pollutants for which the Federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.

The EPA established national air quality standards for ground-level O₃ and PM_{2.5} in 1997. On May 14, 1999, the Court of Appeals for the District of Columbia Circuit issued a decision ruling that the CAA, as applied in setting the new public health standards for O₃ and particulate matter, was unconstitutional as an improper delegation of legislative authority to the EPA. On February 27, 2001, the U.S. Supreme Court upheld the way that the government sets air quality standards under the CAA. The Court unanimously rejected industry arguments that the EPA must consider financial cost as well as health benefits in writing standards. The Justices also rejected arguments that the EPA took too much lawmaking power from Congress when it set tougher standards for O₃ and soot in 1997. Nevertheless, the Court threw out the EPA’s policy for implementing new O₃ rules, stating that the EPA ignored a section of the law that restricts its authority to enforce such rules.

In April 2003, the EPA was cleared by the White House Office of Management and Budget (OMB) to implement the eight-hour ground-level O₃ standard. The EPA issued the proposed rule implementing the eight-hour O₃ standard in April 2003. The EPA completed final eight-hour nonattainment status on April 15, 2004. The EPA issued the final PM_{2.5} implementation rule in fall 2004. The EPA issued final designations on December 14, 2004.

Effective January 22, 2010, the EPA strengthened the standard for NO₂ by setting a new 1-hour standard at the level of 100 parts per billion (ppb). This standard defines the maximum allowable concentration anywhere in an area and will protect against adverse health effects associated with short-term exposure to NO₂. To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 100 ppb. On January 25, 2010, the EPA issued the final rule setting the one-hour maximum standard for NO₂ at 100 parts per billion (ppb). The agency retained the annual standard of 53 ppb.

Additionally, effective June 2, 2010, the EPA revised the primary standard for SO₂ by establishing a new 1-hour standard at a level of 75 ppb. The EPA revoked the two existing primary standards of 140 ppb evaluated over 24 hours and 30 ppb evaluated over an entire year as they would not provide additional public health protection given a 1-hour standard at 75 ppb. To attain this standard, the 3-year average of the 99th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 75 ppb.

4.3.2.2 State Regulations

Mulford-Carrell Act. The State began to set California Ambient Air Quality Standards (CAAQS) in 1969 under the mandate of the Mulford-Carrell Act. The CAAQS are generally more stringent than the NAAQS. In addition to the six criteria pollutants covered by the NAAQS, there are CAAQS for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Originally, there were no attainment deadlines for CAAQS; however, the CCAA of 1988 provided a time frame and a planning structure to promote their attainment. The CCAA required nonattainment areas in the State to prepare attainment plans and proposed to classify each such area on the basis of the submitted plan, as follows: moderate, if CAAQS attainment could not occur before December 31, 1994; serious, if CAAQS attainment could not occur before December 31, 1997; and severe, if

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CAAQS attainment could not be conclusively demonstrated at all. The attainment plans are required to achieve a minimum 5 percent annual reduction in the emissions of nonattainment pollutants unless all feasible measures have been implemented. The EPA has designated the Southern California Association of Governments (SCAG) as the Metropolitan Planning Organization (MPO) responsible for ensuring compliance with the requirements of the CAA for the Basin.

California Clean Air Act (CCAA). The CCAA was passed into law in 1988. The CCAA provides the basis for air quality planning and regulation independent of federal regulations. A major element of the CCAA is the requirement that local air districts in violation of the CAAQS must prepare attainment plans that identify air quality problems, causes, trends and actions to be taken to attain and maintain California's air quality standards by the earliest practicable date. The CCAA provides air districts with the authority to manage transportation activities at indirect sources that individually are minor but collectively emit a substantial amount of pollution such as motor vehicles at intersections, malls, and on highways. The SCAQMD also regulates stationary sources of pollution throughout its jurisdictional area. Direct emissions from motor vehicles are regulated by the CARB.

CARB Airborne Toxic Control Measure/Asbestos. Asbestos is listed as a toxic air contaminant by CARB and as a Hazardous Air Pollutant by the EPA. Asbestos occurs naturally in surface deposits of several types of rock formations. Asbestos most commonly occurs in ultramafic rock that has undergone partial or complete alteration to serpentine rock (serpentinite) and often contains chrysotile asbestos. In addition, another form of asbestos, tremolite, can be found associated with ultramafic rock, particularly near faults. Crushing or breaking these rocks, through construction or other means, can release asbestoform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. In July 2001, the CARB approved an Air Toxic Control Measure for construction, grading, quarrying and surface mining operations to minimize emissions of naturally occurring asbestos. The regulation requires application of best management practices (BMPs) to control fugitive dust in areas known to have naturally occurring asbestos and requires notification to the local air district prior to commencement of ground-disturbing activities. The measure establishes specific testing, notification and engineering controls prior to grading, quarrying or surface mining in construction zones where naturally occurring asbestos is located on projects of any size. There are additional notification and engineering controls at work sites larger than one acre in size. These projects require the submittal of a "Dust Mitigation Plan" and approval by the air district prior to the start of a project. There is no asbestos in the project area (U.S. Geological Survey 2011).

4.3.2.3 Regional Regulations

Lewis Air Quality Management Act. The 1976 Lewis Air Quality Management Act established the SCAQMD and other air districts throughout the State. The Federal CAA Amendments of 1977 required that each state adopt an implementation plan outlining pollution control measures to attain the Federal standards in nonattainment areas of the State.

The CARB is responsible for incorporating air quality management plans for local air basins into an SIP for EPA approval. Significant authority for air quality control within them has been given to local air districts that regulate stationary source emissions and develop local nonattainment plans.

Carl Moyer Memorial Air Quality Standards Attainment Program. Since 1998, the Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program) has provided funding to encourage the voluntary purchase of cleaner engines, equipment, and emission reduction technologies. The Carl Moyer Program plays a complementary role to California's regulatory program by funding emission reductions that are surplus, i.e., early and/or in excess of what is required by

regulation. The Carl Moyer Program accelerates the turnover of old highly-polluting engines, speeds the commercialization of advanced emission controls, and reduces air pollution impacts on environmental justice communities. Emission reductions achieved through the Carl Moyer Program are an important component of the California State Implementation Plan.

Regional Air Quality Management Plan (AQMP). The SCAQMD and the SCAG are responsible for formulating and implementing the AQMP, which has a 20-year horizon for the Basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the Federal and/or California ambient air quality standards. The SCAQMD and SCAG must update the AQMP every three years. The current regional air quality plan is the Final 2012 Air Quality Management Plan (AQMP) adopted by the SCAQMD on December 7, 2012.

2003 AQMP. One of the purposes of the 2003 AQMP is to lead the Basin and portions of the Salton Sea Air Basin under SCAQMD jurisdiction into compliance with the 1-hour ozone and PM₁₀ Federal standards (SCAQMD 2003).

The 2003 AQMP also replaced the 1997 attainment demonstration for the Federal CO standard, provided a basis for a maintenance plan for CO for the future, and updated the maintenance plan for the Federal nitrogen dioxide standard that the Basin has met since 1992 (2003 AQMP, page 1-1).

The 2003 AQMP also incorporated new scientific data in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The 2003 AQMP utilized complex modeling to show that with the control measures, the Basin would be in compliance with the Federal and State standards for all pollutants by 2010, except for the State ozone and PM₁₀ standards and the State ozone and PM₁₀ standards after 2010 or by the earliest practicable date, as mandated by the California Health and Safety Code Section 40462. The CARB approved the 2003 AQMP on August 1, 2003. The EPA's adequacy finding on the emissions budgets for conformity determination in the Basin was published in the Federal Register (69 FR 15325-15326).

2007 AQMP. One of the purposes of the 2007 AQMP is to lead the Basin into compliance with the Federal 8-hour ozone and PM_{2.5} standards. The 2007 AQMP was adopted by the SCAQMD on June 1, 2007 (SCAQMD 2007b). On July 13, 2007, the SCAQMD Board adopted the 2007 Final AQMP Transportation Conformity Budgets and directed the Executive Officer to forward them to the CARB for approval and subsequent submittal to the EPA. On September 27, 2007, the CARB adopted the State Strategy for the 2007 State Implementation Plan and the 2007 AQMP as part of the State Implementation Plan. On January 15, 2009, the EPA's regional administrator signed a final rule to approve in part and disapprove in part the SCAQMD 2003 1-hour ozone plan and the nitrogen dioxide maintenance plan. The parts of the plan that were approved strengthen the State Implementation Plan. The Clean Air Act does not require the disapproved portions of the plan, and the disapprovals do not start sanctions clocks.

The 2007 AQMP outlines a detailed strategy for meeting the Federal health-based standards for PM_{2.5} by 2015 and 8-hour ozone by 2024 while accounting for and accommodating future expected growth. The 2007 AQMP incorporates significant new emissions inventories, ambient measurements, scientific data, control strategies, and air quality modeling. Most of the reductions will be from mobile sources, which are currently responsible for about 75 percent of all smog and particulate-forming emissions. The 2007 AQMP includes 37 control measures proposed for adoption by the SCAQMD, including measures to reduce emissions from new commercial and residential developments, more reductions from industrial facilities, and reductions from wood-burning fireplaces and restaurant char broilers.

2012 AQMP. The 2012 AQMP was adopted December 7, 2012 (SCAQMD 2012b). The purpose of the 2012 AQMP for the Basin is to set forth a program that will lead the Basin into compliance with

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the Federal 24-hour PM_{2.5} air quality standard, and to provide an update of the Basin's projections in meeting the Federal 8-hour ozone standards. The AQMP was adopted by the SCAQMD Board; therefore, it was submitted to the EPA as the State Implementation Plan (SIP). Specifically, the AQMP will serve as the official SIP submittal for the Federal 2006 24-hour PM_{2.5} standard. In addition, the AQMP will update specific elements of the previously approved 8-hour ozone SIP: 1) an updated emissions inventory, and 2) new control measures and commitments for emissions reductions to help fulfill the Section 182(e)(5) portion of the 8-hour ozone SIP.

The 2012 AQMP states, "The remarkable historical improvement in air quality since the 1970's is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs."

The 2012 AQMP proposes Basin-wide PM_{2.5} measures that will be implemented by the 2014 attainment date, episodic control measures to achieve air quality improvements (would only apply during high PM_{2.5} days), Section 182(e)(5) implementation measures (to maintain progress toward meeting the 2023 8-hour ozone national standard), and transportation control measures. Most of the control measures focus on incentives, outreach, and education.

Proposed PM_{2.5} reduction measures in the 2012 AQMP include the following:

- Further NO_x reductions from the SCAQMD's Regional Clean Air Incentives Market (RECLAIM) program. The RECLAIM program was adopted by the SCAQMD in October 1993 and set an emissions cap and declining balance for many of the largest facilities emitting NO_x and SO_x in the South Coast Air Basin. RECLAIM includes over 350 participants in its NO_x market and about 40 participants in its SO_x market. RECLAIM has the longest history and practical experience of any locally designed and implemented air emissions cap and trade program. RECLAIM allows participating facilities to trade air pollution while meeting clean air goals.
- Further reductions from residential wood-burning devices.
- Further reductions from open burning.
- Emission reductions from under-fired char broilers.
- Further ammonia reductions from livestock waste.
- Backstop measures for indirect sources of emissions from ports and port-related sources.
- Further criteria pollutant reductions from education, outreach, and incentives.

There are multiple VOC and NO_x reductions in the 2012 AQMP to attempt to reduce ozone formation, including further VOC reductions from architectural coatings, miscellaneous coatings, adhesives, solvents, lubricants, and mold release products.

The 2012 AQMP also contains proposed mobile source implementation measures for the deployment of zero and near-zero emission on-road heavy-duty vehicles, locomotives, and cargo handling equipment. There are measures for the deployment of cleaner commercial harbor craft, cleaner ocean-going marine vessels, cleaner off-road equipment, and cleaner aircraft engines.

The 2012 AQMP proposes the following mobile source implementation measures:

- On-road mobile sources:
 - Accelerated penetration of partial zero-emission and zero-emission vehicles. This measure proposes to continue incentives for the purchase of zero-emission vehicles and hybrid vehicles with a portion of their operation in an all-electric range mode. The state Clean Vehicle Rebate Pilot program is proposed to continue from 2015 to 2023 with a proposed

- funding for up to \$5,000 per vehicle. The measure seeks to provide funding assistance for up to 1,000 zero-emission or partial-zero emission vehicles per year.
- Accelerated penetration of partial zero-emission and zero-emission light-heavy and medium-heavy duty vehicles through funding assistance for purchasing the vehicles. The objective of the proposed action is to accelerate the introduction of advanced hybrid and zero-emission technologies for Class 4 through 6 heavy-duty vehicles. The state is currently implementing a Hybrid Vehicle Incentives Project program to promote zero-emission and hybrid heavy-duty vehicles. The proposed measure seeks to continue the program from 2015 to 2023 to deploy up to 1,000 zero- and partial-zero emission vehicles per year with up to \$25,000 funding assistance per vehicle. Zero-emission vehicles and hybrid vehicles with a portion of their operation in an all-electric range mode would be given the highest priority.
 - Accelerated retirement of older light-, medium-, and heavy-duty vehicles through funding incentives.
 - Further emission reductions from heavy-duty vehicles serving near-dock rail yards This proposed control measure calls for a requirement that any cargo container moved between the ports of Los Angeles and Long Beach to the nearby rail yards be with zero-emission technologies. The measure would be fully implemented by 2020 through the deployment of zero-emission trucks or any alternative zero-emission container movement system such as a fixed guideway system. The measure calls for the CARB to either adopt a new regulation or amend an existing regulation to require such deployment by 2020.
- Off-road mobile sources:
 - Extension of the Surplus Off-Road Opt-In for NOx (SOON) provision for construction/industrial equipment, which provides funding to repower or replace older Tier 0 and Tier 1 equipment.
 - Further emission reductions from freight and passenger locomotives calls for an accelerated use of Tier 4 locomotives in the Basin.
 - Further emission reductions from ocean-going marine vessels while at berth.
 - Emission reductions from ocean-going marine vessels.

The 2012 AQMP also relies upon the SCAG regional transportation strategy, which is in its adopted 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2011 Federal Transportation Improvement Program, which contains the following sections:

1. Linking regional transportation planning to air quality planning and making sure that the regional transportation plan supports the goals and objectives of the AQMP/SIP.
2. Regional transportation strategy and transportation control measures: The RTP/SCS contains improvements to the regional multimodal transportation system including the following: active transportation (non-motorized transportation, e.g., biking and walking); transportation demand management; transportation system management; transit; passenger and high-speed rail; goods movement; aviation and airport ground access; highways; arterials; and operations and maintenance.
3. Reasonably available control measure analysis.

Diesel Regulations. The Ports of Long Beach and Los Angeles and the CARB have adopted regulations aimed at reducing the amount of diesel particulate. These programs are the Ports of Los

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Angeles and Long Beach “Clean Truck Program,¹ the CARB Drayage Truck Regulation,² and the CARB statewide On-road Truck and Bus Regulation.³ Each of these regulatory programs will require an accelerated introduction of “clean trucks” into the statewide truck fleet that will result in substantially lower diesel emissions during the 2008 to 2020 timeframe.

- *Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 horsepower and Greater.* Effective February 19, 2011, each fleet shall comply with weighted reduced particulate matter emission fleet averages by compliance dates listed in the regulation.
- *CARB Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling* adopts new Section 2485 within Chapter 10, Article 1, Division 3, Title 13 in the California Code of Regulations. The measure limits the idling of diesel vehicles (i.e., commercial trucks over 10,000 pounds) to reduce emissions of toxics and criteria pollutants. The driver of any vehicle subject to this section: (1) shall not idle the vehicle’s primary diesel engine for greater than five minutes at any location; and (2) shall not idle a diesel-fueled auxiliary power system for more than five minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if it has a sleeper berth and the truck is located within 100 feet of a restricted area (homes and schools).
- *CARB Final Regulation Order, Requirements to Reduce Idling Emissions from New and In-Use Trucks*, requires that new 2008 and subsequent model-year heavy-duty diesel engines be equipped with an engine shutdown system that automatically shuts down the engine after 300 seconds of continuous idling operation once the vehicle is stopped, the transmission is set to ‘neutral’ or ‘park,’ and the parking brake is engaged. If the parking brake is not engaged, then the engine shutdown system shall shut down the engine after 900 seconds of continuous idling operation once the vehicle is stopped and the transmission is set to neutral or park.” There are a few conditions where the engine shutdown system can be overridden to prevent engine damage. Any project trucks manufactured after 2008 would be consistent with this rule, which would ultimately reduce air emissions.
- *CARB Regulation for In-Use Off-Road Diesel Vehicles.* On July 26, 2007, the CARB adopted a regulation to reduce diesel particulate matter and NO_x emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. All self-propelled off-road diesel vehicles over 25 horsepower (hp) used in California and most two-engine vehicles (except on-road two-engine sweepers) are subject to this regulation. This includes vehicles that are rented or leased (rental or leased fleets). Such vehicles are used in construction, mining, and industrial operations. The regulation:
 - imposes limits on idling to no more than five consecutive minutes,
 - restricts adding of older equipment (such as Tier 0 and Tier 1) into fleets,
 - requires reporting and labeling, and
 - requires disclosure of the regulation upon vehicle sale.

The CARB is enforcing that with fines up to \$10,000 per day for each vehicle in violation. Performance requirements of the rule are based on a fleet’s average NO_x emissions, which can be met by replacing older vehicles with newer, cleaner vehicles or by applying exhaust retrofits. The regulation was amended in 2010 to delay the original timeline of the performance requirements making the first compliance deadline January 1, 2014 for large fleets (over 5,000 horsepower), 2017 for medium fleets (2,501-5,000 horsepower), and 2019 for small fleets (2,500 horsepower or less).

¹ http://www.portoflosangeles.org/ctp/idx_ctp.asp.

² <http://www.arb.ca.gov/msprog/onroad/porttruck/porttruck.htm>.

³ <http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Toxic Air Contaminants. A toxic air contaminant (TAC) is defined as an air pollutant that may cause or contribute to an increase in mortality (death) or serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations. Hazardous Air Pollutants (HAPs) and TACs are used interchangeably in this discussion. HAPs are regulated by the EPA under the Federal Clean Air Act. TAC is the term used under the California Clean Air Act to regulate the same hazardous pollutants. These contaminants tend to be localized and are found in relatively low concentrations in ambient air. However, they can result in adverse chronic health effects if exposure to low concentrations occurs for periods of several years. Many of these contaminants originate from human activities, such as fuel combustion and solvent use.

In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no threshold level below which adverse health impacts are not expected to occur. This contrasts with the criteria pollutants carbon dioxide, nitrogen dioxide, particulate matter, and ozone for which acceptable levels of exposure can be determined and for which the State and federal governments have set ambient air quality standards. For this reason, thresholds for TAC impacts for regulatory purposes and for CEQA thresholds have been set based on the increase in risk of cancer of a specific amount at sensitive receptors located near the source of TAC emissions.

The California Almanac of Emissions and Air Quality presents the relevant concentration and cancer risk data for the ten TACs that pose the most substantial health risk in California based on available data. These TACs are as follows: acetaldehyde, benzene, 1,3-butadiene, carbon tetrachloride, hexavalent chromium, paradichlorobenzene, formaldehyde, methylene chloride, perchloroethylene, and diesel particulate matter (diesel PM).

TAC measurements, available at the SCAQMD Riverside Rubidoux monitoring station (14 miles northwest of the project site) can be used to characterize the “background” health risks from regional TAC emission sources. Table 4.3.F provides this summary of TAC levels in the project area and health risk information. This table lists the air concentration levels and associated health cancer risks for eight of the nine TACs reported by the CARB in its Almanac as measured at the Riverside-Rubidoux air monitoring station. Note that since diesel PM cannot be measured directly, the table does not provide estimates of either measured diesel PM or the cancer risk associated with diesel PM.

Past studies have indicated that diesel PM poses the greatest health risk among the TACs listed in Table 4.3.F. The principal concern regarding exposures to diesel PM lies in its small size and thus its ability to penetrate deep into lung tissues when inhaled. Diesel exhaust has been found to cause health effects from short-term or acute exposures and from long-term chronic exposures, such as repeated occupational exposures. The type and severity of health effects depends upon several factors including the amount of chemical you are exposed to and the length of time you are exposed. Individuals also react differently to different levels of exposure. There is limited information on exposure to just diesel PM but there is enough evidence to indicate that inhalation exposure to diesel exhaust causes acute and chronic health effects.

Long-term (chronic) exposure to diesel exhaust is likely to occur when a person works in a field where diesel is used regularly or experiences repeated exposure to diesel fumes over a long period of time. Human health studies demonstrate a correlation between exposure to diesel exhaust and increased lung cancer rates in occupational settings. Experimental animal inhalation studies of chronic exposure to diesel exhaust have shown that a range of doses causes varying levels of inflammation and cellular changes in the lungs. Human and laboratory studies have also provided considerable evidence that diesel exhaust is a likely carcinogen.

Several occupational and ambient studies have documented the health effects due to exposure to diesel PM. The California Office of Environmental Health Hazards Assessment (OEHHA), in its role in

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assessing risk from environmental factors reviews such studies and makes recommendations on the way environmental risk should be evaluated through programs like the AB2588 Hot Spot Program. In its comprehensive assessment of diesel exhaust, OEHHA analyzed more than 30 studies of people who worked around diesel equipment, including truck drivers, 1950's era railroad workers, and equipment operators. The studies showed these workers were more likely to develop lung cancer than workers who were not exposed to diesel emissions. These studies provide strong evidence that long-term occupational exposure to diesel exhaust increases the risk of lung cancer. However, all of these studies were based on exposure to exhaust from traditional diesel engines and prior to the advent of highly efficient emissions controls like the diesel particulate filter. Based on these studies, CARB identified diesel exhaust a toxic air contaminant in 1998.

In 2008, the SCAQMD released the third iteration of the Multiple Air Toxics Exposure Study (MATES-III). The MATES-III report includes monitoring of various air toxic compounds in the Basin, establishes and updates existing baseline toxic air contaminants, and simulates cancer risk in the Basin. The study focuses on the carcinogenic risk from exposure to air toxics. It does not estimate mortality or other health effects from particulate exposures. The SCAQMD MATES-III report indicates that overall in the Basin, diesel PM contributes 83.6 percent of the risk.

In 2014, the SCAQMD released the fourth iteration of the Multiple Air Toxics Exposure Study (MATES-IV). The MATES-IV is a follow up to the previous MATES studies and included an updated toxics air emission inventory, new air toxics air dispersion modeling, and enhanced air toxics monitoring. A key conclusion reached in the MATES-IV study was that the population weighted cancer risk in the Basin decreased by 57 percent from the MATES-III period in 2005 to the MATES-IV period in 2012 indicating that overall, cancer risks are declining in the Basin as a result of the implementation of emission controls principally on large diesel trucks. The MATES-IV study also concluded that diesel PM contributed 68 percent to the total cancer risk in the Basin with benzene and 1,3 Butadiene also making important contributions to cancer risk. Figure 4.2.15 summarizes the basin-wide cancer risks as derived from the MATES-IV study.

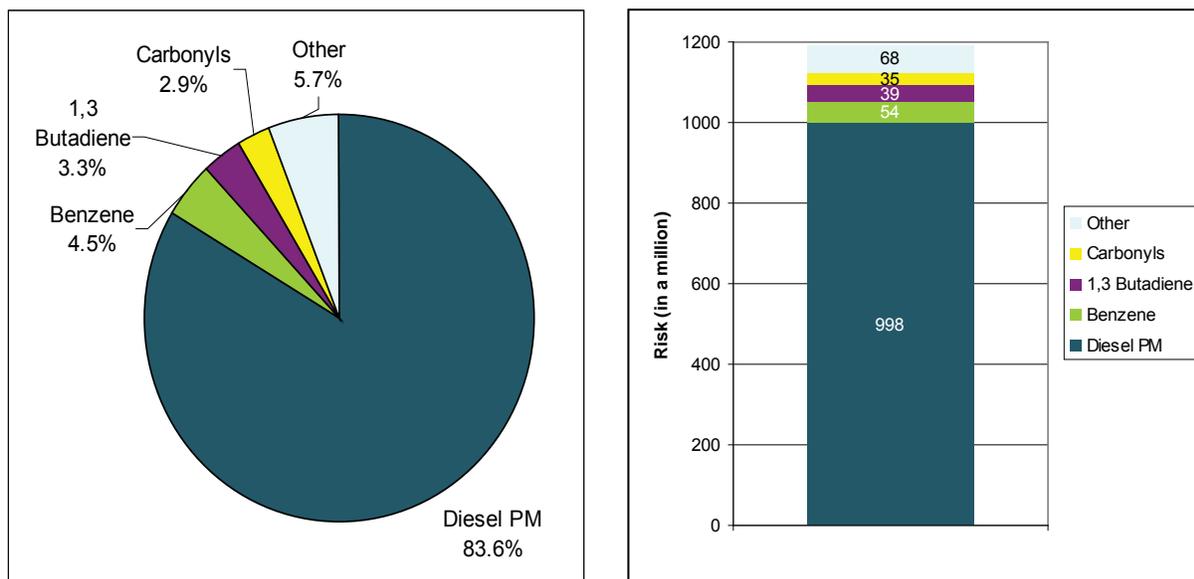


Figure 4.3.15: Summary of MATES IV Cancer Risks

Table 4.3.F: Toxic Air Contaminant Concentration Levels and Associated Health Effects (Riverside, California) (new table)

TAC	Concentration ^A / Health Risk ^B	2007		2008		2009		Health Effects
		Mean	Health Risk	Mean	Health Risk	Mean	Health Risk	
Acetaldehyde	Mean	1.08		0.99		1.22		Acetaldehyde is a carcinogen that also causes chronic non-cancer toxicity in the respiratory system. Symptoms of chronic intoxication of acetaldehyde in humans resemble those of alcoholism. The primary acute effect of inhalation exposure to acetaldehyde is irritation of the eyes, skin, and respiratory tract in humans. At higher exposure levels, erythema, coughing, pulmonary edema, and necrosis may also occur. Acute inhalation of acetaldehyde resulted in a depressed respiratory rate and elevated blood pressure in experimental animals. Benzene is highly carcinogenic and occurs throughout California. Benzene also has non-cancer health effects. Brief inhalation exposure to high concentrations can cause central nervous system depression. Acute effects include central nervous system symptoms of nausea, tremors, drowsiness, dizziness, headache, intoxication, and unconsciousness. Neurological symptoms of inhalation exposure to benzene include drowsiness, dizziness, headaches, and unconsciousness in humans. Ingestion of large amounts of benzene may result in vomiting, dizziness, and convulsions in humans. Exposure to liquid and vapor may irritate the skin, eyes, and upper respiratory tract in humans. Redness and blisters may result from dermal exposure to benzene. Chronic inhalation of certain levels of benzene causes disorders in the blood in humans. Benzene specifically affects bone marrow (the tissues that produce blood cells). Aplastic anemia, excessive bleeding, and damage to the immune system (by changes in blood levels of antibodies and loss of white blood cells) may develop. Increased incidence of leukemia (cancer of the tissues that form white blood cells) has been observed in humans occupationally exposed to benzene. In California, hexavalent chromium has been identified as a carcinogen. There is epidemiological evidence that exposure to inhaled hexavalent chromium may result in lung cancer. The principal acute effects are renal toxicity, gastrointestinal hemorrhage, and intravascular hemolysis. The respiratory tract is the major target organ for chromium (VI) following inhalation exposure in humans. Other effects noted from acute inhalation exposure to very high concentrations of chromium (VI) include gastrointestinal and neurological effects, while dermal exposure causes skin burns in humans. Chronic inhalation exposure to chromium (VI) in humans results in effects on the respiratory tract, with perforations and ulcerations of the septum, bronchitis, decreased pulmonary function, pneumonia, asthma, and nasal itching and soreness reported. Chronic human exposure to high levels of chromium (VI) by inhalation or oral exposure may produce effects on the liver, kidneys, gastrointestinal and immune systems, and possibly the blood.
	Health Risk	5		5		5		
Benzene	Mean	0.40		0.33		ID		Benzene is highly carcinogenic and occurs throughout California. Benzene also has non-cancer health effects. Brief inhalation exposure to high concentrations can cause central nervous system depression. Acute effects include central nervous system symptoms of nausea, tremors, drowsiness, dizziness, headache, intoxication, and unconsciousness. Neurological symptoms of inhalation exposure to benzene include drowsiness, dizziness, headaches, and unconsciousness in humans. Ingestion of large amounts of benzene may result in vomiting, dizziness, and convulsions in humans. Exposure to liquid and vapor may irritate the skin, eyes, and upper respiratory tract in humans. Redness and blisters may result from dermal exposure to benzene. Chronic inhalation of certain levels of benzene causes disorders in the blood in humans. Benzene specifically affects bone marrow (the tissues that produce blood cells). Aplastic anemia, excessive bleeding, and damage to the immune system (by changes in blood levels of antibodies and loss of white blood cells) may develop. Increased incidence of leukemia (cancer of the tissues that form white blood cells) has been observed in humans occupationally exposed to benzene. In California, hexavalent chromium has been identified as a carcinogen. There is epidemiological evidence that exposure to inhaled hexavalent chromium may result in lung cancer. The principal acute effects are renal toxicity, gastrointestinal hemorrhage, and intravascular hemolysis. The respiratory tract is the major target organ for chromium (VI) following inhalation exposure in humans. Other effects noted from acute inhalation exposure to very high concentrations of chromium (VI) include gastrointestinal and neurological effects, while dermal exposure causes skin burns in humans. Chronic inhalation exposure to chromium (VI) in humans results in effects on the respiratory tract, with perforations and ulcerations of the septum, bronchitis, decreased pulmonary function, pneumonia, asthma, and nasal itching and soreness reported. Chronic human exposure to high levels of chromium (VI) by inhalation or oral exposure may produce effects on the liver, kidneys, gastrointestinal and immune systems, and possibly the blood.
	Health Risk	37		30		ID		
Chromium Hex	Mean	0.35		ID		ID		Benzene is highly carcinogenic and occurs throughout California. Benzene also has non-cancer health effects. Brief inhalation exposure to high concentrations can cause central nervous system depression. Acute effects include central nervous system symptoms of nausea, tremors, drowsiness, dizziness, headache, intoxication, and unconsciousness. Neurological symptoms of inhalation exposure to benzene include drowsiness, dizziness, headaches, and unconsciousness in humans. Ingestion of large amounts of benzene may result in vomiting, dizziness, and convulsions in humans. Exposure to liquid and vapor may irritate the skin, eyes, and upper respiratory tract in humans. Redness and blisters may result from dermal exposure to benzene. Chronic inhalation of certain levels of benzene causes disorders in the blood in humans. Benzene specifically affects bone marrow (the tissues that produce blood cells). Aplastic anemia, excessive bleeding, and damage to the immune system (by changes in blood levels of antibodies and loss of white blood cells) may develop. Increased incidence of leukemia (cancer of the tissues that form white blood cells) has been observed in humans occupationally exposed to benzene. In California, hexavalent chromium has been identified as a carcinogen. There is epidemiological evidence that exposure to inhaled hexavalent chromium may result in lung cancer. The principal acute effects are renal toxicity, gastrointestinal hemorrhage, and intravascular hemolysis. The respiratory tract is the major target organ for chromium (VI) following inhalation exposure in humans. Other effects noted from acute inhalation exposure to very high concentrations of chromium (VI) include gastrointestinal and neurological effects, while dermal exposure causes skin burns in humans. Chronic inhalation exposure to chromium (VI) in humans results in effects on the respiratory tract, with perforations and ulcerations of the septum, bronchitis, decreased pulmonary function, pneumonia, asthma, and nasal itching and soreness reported. Chronic human exposure to high levels of chromium (VI) by inhalation or oral exposure may produce effects on the liver, kidneys, gastrointestinal and immune systems, and possibly the blood.
	Health Risk	52		ID		ID		

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Table 4.3.F: Toxic Air Contaminant Concentration Levels and Associated Health Effects (Riverside, California) (new table)

TAC	Concentration ^A / Health Risk ^B	2007		2008		2009		Health Effects
		Mean	Health Risk	Mean	Health Risk	Mean	Health Risk	
Para-Dichlorobenzene	Mean	ID	ID	ID	ID	ID	ID	In California, para-dichlorobenzene has been identified as a carcinogen. Acute exposure to 1,4-dichlorobenzene via inhalation results in irritation to the eyes, skin, and throat in humans. In addition, long-term inhalation exposure may affect the liver, skin, and central nervous system in humans (e.g., cerebellar ataxia, dysarthria, weakness in limbs, and hyporeflexia).
	Health Risk	ID	ID	ID	ID	ID	ID	
Formaldehyde	Mean	2.88	21	2.88	21	3.12	23	The major toxic effects caused by acute formaldehyde exposure via inhalation are eye, nose, and throat irritation and effects on the nasal cavity. Other effects seen from exposure to high levels of formaldehyde in humans are coughing, wheezing, chest pains, and bronchitis. Chronic exposure to formaldehyde by inhalation in humans has been associated with respiratory symptoms and eye, nose, and throat irritation. Animal studies have reported effects on the nasal respiratory epithelium and lesions in the respiratory system from chronic inhalation exposure to formaldehyde. Occupational studies have noted statistically significant associations between exposure to formaldehyde and increased incidence of lung and nasopharyngeal cancer. This evidence is considered "limited" rather than "sufficient" due to possible exposure to other agents that may have contributed to the excess cancers. EPA considers formaldehyde to be a probable human carcinogen (cancer-causing agent) and has ranked it in EPA's Group B1. In California, formaldehyde has been identified as a carcinogen.
	Health Risk	21	21	21	21	23	23	
Methylene Chloride	Mean	0.19	0.2	0.19	0.2	ID	ID	Case studies of methylene chloride poisoning during paint-stripping operations have demonstrated that inhalation exposure to extremely high levels can be fatal to humans. Acute inhalation exposure to high levels of methylene chloride in humans has resulted in effects on the central nervous system, including decreased visual, auditory, and psychomotor functions, but these effects are reversible once exposure ceases. Methylene chloride also irritates the nose and throat at high concentrations. The major effects from chronic inhalation exposure to methylene chloride in humans are effects on the central nervous system, such as headaches, dizziness, nausea, and memory loss. In addition, chronic exposure can lead to bone marrow, hepatic, and renal toxicity. EPA considers methylene chloride to be a probable human carcinogen and has ranked it in EPA's Group B2. California considers methylene chloride to be carcinogenic.
	Health Risk	0.7	0.7	0.7	0.7	ID	ID	
Perchloroethylene	Mean	0.035	0.024	0.035	0.024	ID	ID	In California, perchloroethylene has been identified as a carcinogen. Perchloroethylene vapors are irritating to the eyes and respiratory tract. Following chronic exposure, workers have shown signs of liver toxicity, as well as kidney dysfunction and neurological disorders.
	Health Risk	1	1	1	1	ID	ID	
Diesel PM	Mean	No Monitoring Data Available						In its comprehensive assessment of diesel exhaust, OEHHA analyzed more than 30 studies of people who worked around diesel equipment, including truck drivers, railroad workers, and equipment operators. The studies showed these workers were more likely to develop lung cancer than workers who were not exposed to diesel emissions. These studies provided strong evidence that long-term occupational exposure to diesel exhaust increases
	Health Risk							

Table 4.3.F: Toxic Air Contaminant Concentration Levels and Associated Health Effects (Riverside, California) (new table)

TAC	Concentration ^A / Health Risk ^B	Health Effects		
		2007	2008	2009
		<p>the risk of lung cancer. Exposure to diesel exhaust can have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, diesel exhaust particles made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. This research was based on studies prior to the advent of modern diesel engines with high efficiency emissions controls.</p> <p>Note: Since then the Health Effects Institute study clearly demonstrates that the application of new emissions control technology to diesel engines have virtually eliminated the health impacts of diesel exhaust.</p>		

ID = Insufficient data

A = Concentrations for Hexavalent Chromium are expressed as $\mu\text{g}/\text{m}^3$, and concentrations for Diesel PM are expressed as $\mu\text{g}/\text{m}^3$. Concentrations for all other TACs are expressed as ppb.

B = Health Risk represents the number of excess cancer cases per million people based on a lifetime (70-year) exposure to the annual average concentration. Total Health Risk represents only those compounds listed in this table and only those with data for the year. There may be other significant compounds for which monitoring and/or health risk information are not available

Source: CARB 2011 for the SCAQMD Riverside-Rubidoux air monitoring station.

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The risk basin-wide population weighted cancer risk is 367 per million based on average at fixed monitoring sites estimated during the MATES-IV study. This level of risk means that on average an estimated 367 individuals in the basin could contract cancer out of a population of one million individuals exposed to all sources of toxic air contaminants over a lifetime of 70 years. A comprehensive air dispersion model and a detailed air toxics emission inventory were then used to estimate cancer risks at other locations where no monitoring sites were deployed. A 10-year research program (CARB 1998) demonstrated that diesel PM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to diesel PM poses a chronic health risk.

In addition to increasing the risk of lung cancer, exposure to diesel exhaust can have other health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. Diesel exhaust has been major source of fine particulate pollution as well, and studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems.

Diesel PM differs from other TACs in that it is not a single substance but a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled, internal combustion engines, the composition of the emissions varies, depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present. Unlike the other TACs, however, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. The CARB has made preliminary concentration estimates based on a diesel PM exposure method. This method uses the CARB emissions inventory's PM₁₀ database, ambient PM₁₀ monitoring data, and the results from several studies to estimate concentrations of diesel PM. Within the Basin, in addition to diesel PM, there are emissions of benzene, formaldehyde, acetaldehyde, naphthalene, ethylbenzene, acrolein, toluene, hexane, propylene, and xylene from a variety of sources located within the Basin that contribute to health risks.

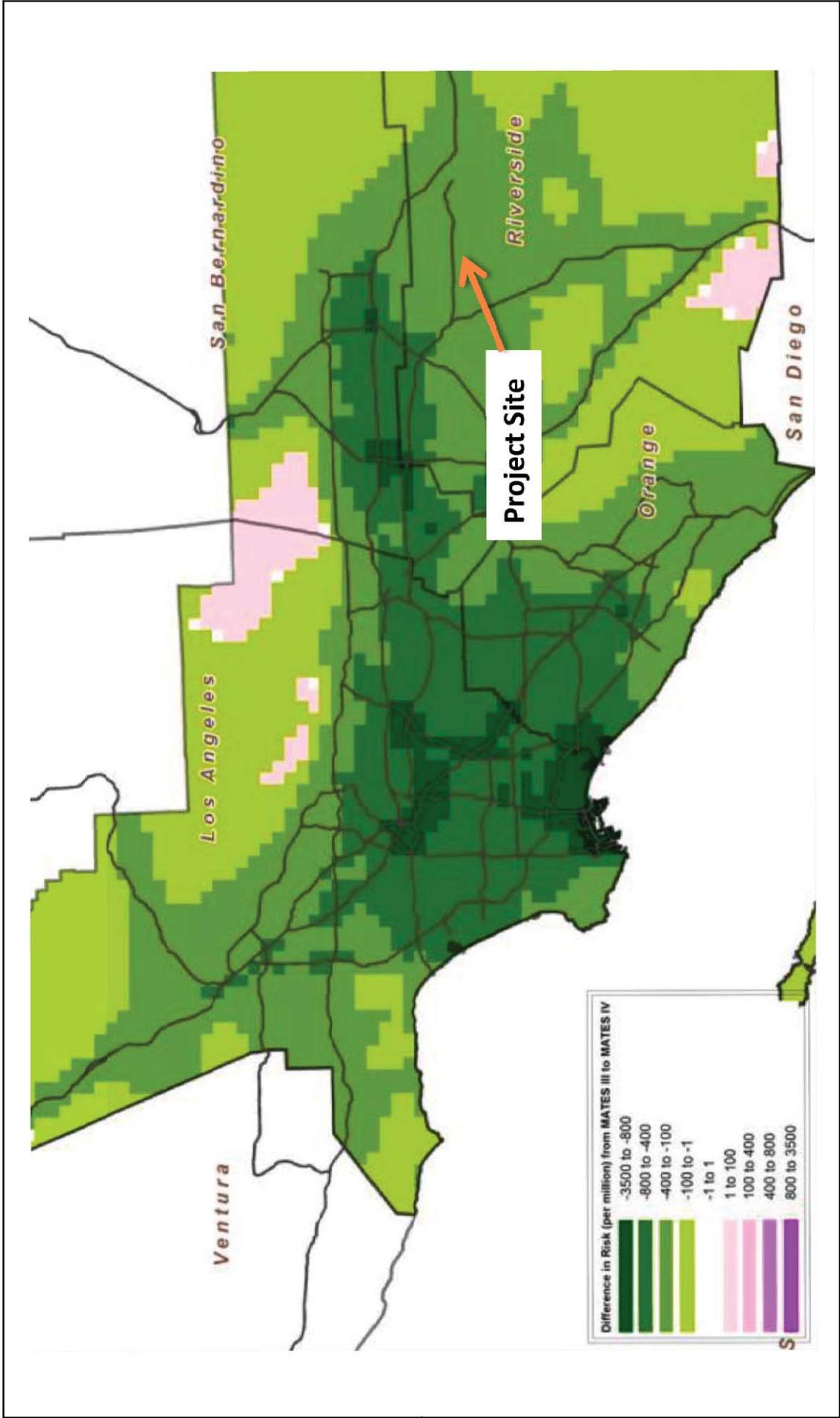
The average cancer risk in the project area is estimated to be 213 in a million based on the MATES-IV and ranges from 198 in a million at the southeast corner of the project to 239 in a million in the northern portion of the project as shown in Figure 4.3.16.

As shown in Figure 4.3.17, nearly all areas of the Basin experienced decreases in cancer risk during the time period from MATES-III time period of 2005 to the MATES-IV time period of 2012. The project area also experienced a decrease in cancer risk of between 100 and 400 in one million from the years 2005 to 2012.

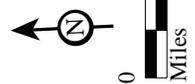
Figure 4.3.17 depicts the cancer risk estimates as a “snapshot in time.” That is, the cancer risks are derived from air dispersion models and are based on the emissions of various TACs during the years 2005 and 2012. The basic tenet used to estimate cancer risk assumes that the public will be exposed to these TAC emissions during an entire 70-year lifetime of continuous exposure. However, the SCAQMD, CARB, and the EPA have adopted numerous regulations that have resulted in significant reductions in pollutant emissions with the attendant reductions in prevailing air quality levels since 2012 as noted earlier. The benefits of substantial additional emission reductions derived from the adoption and application of SCAQMD, CARB, and EPA regulations are not reflected in the estimate of 70-year lifetime cancer risks referred to in Figure 4.3.17.

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Note: Numbers represent lifetime cancer risks in risk per million.

FIGURE 4.3.17

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Additionally, in January 2015, a major new study¹ evaluated the health impacts of “new technology diesel exhaust” (NTDE). Beginning in 2001, USEPA and CARB begin issuing a series of regulations that require new diesel-powered vehicles and equipment to use the latest emissions control technology. This technology relies on two components. The first is a diesel particulate filter, which is capable of reducing particulate matter emissions by over 90% (required for new engines beginning in 2007). The second technology is selective catalytic reduction, which reduces emissions of nitrogen oxides by over 90% (required for new engines beginning in 2010). Diesel emissions from engines equipped with this technology is referred to as NTDE. As a result of the advances in emission control technology, USEPA, CARB, and other government and industry stakeholders commissioned a series of studies called the Advanced Collaborative Emissions Study (ACES). ACES has been guided by an ACES Steering Committee consisting of representatives of HEI and the Coordinating Research Council (CRC: a nonprofit organization that directs engineering and environmental studies on the interaction between automotive or other mobility equipment and petroleum products), along with the U.S. Department of Energy, U.S. EPA, engine manufacturers, the petroleum industry, CARB, emission control manufacturers, the National Resources Defense Council, and others. The Health Effects Institute (HEI), funded in part by USEPA, was selected to oversee Phase 3 of ACES.

Phase 3 of ACES evaluated whether emissions from new technology diesel engines cause cancer or other health effects. Specifically, it evaluated the health impacts of a 2007-compliant engine equipped with a diesel particulate filter. HEI found chronic exposure to NTDE did not induce tumors or pre-cancerous changes in the lung and did not increase tumors that were considered to be related to NTDE in any other tissue in laboratory rats. The study also confirmed that the concentrations of particulate matter and toxic air pollutants emitted from NTDE are more than 90% lower than emissions from traditional older diesel engine. Rats are the most sensitive laboratory animal species for evaluation of older technology diesel engines (pre-model year 2007), because of their sensitivity to high concentrations of particles (present in older technology diesel engines), compared with other species (including humans).

The HEI study clearly demonstrates that the application of new emissions control technology to diesel engines have virtually eliminated the health impacts of diesel exhaust.

Conservative Nature of Health Risk Assessments. Moreover, the current methodological protocols required by the SCAQMD and CARB when studying the health risk posed by diesel PM assume the following (from the California Air Pollution Control Officers Association 2009): (1) 24-hour constant exposure; (2) 350 days a year; (3) for a continuous period lasting 70 years. These are overly conservative assumptions that are not replicated in reality. Most people are indoors for 18–20 hours a day (at their place of employment or home) and most people do not live in the same location for a 70-year period. In fact, less than 10 percent of the population has a continuous residency at the same location of greater than 30 years (American Community Survey 2011). Thus, the health risk assessments prepared pursuant to the current protocols overestimate the risk of cancer associated with diesel PM exposure.

Alternate Views on Diesel PM Risk. Some researchers, such as Dr. James E. Enstrom (2008), believe that the risk from diesel PM is exaggerated. Enstrom calls into question some of the basic research on the declaration of diesel exhaust as a toxic air contaminant. In particular, the article states the following:

There is substantial new epidemiologic evidence relevant to the health effects of diesel exhaust that was not considered when the 1998 toxic air contaminant declaration was made. For instance,

¹ Health Effects Institute. 2015: HEI Research Report 184, Advanced Collaborative Emissions Study (ACES): Lifetime Cancer and Non-Cancer Assessment in Rats Exposed to New-Technology Diesel Exhaust, published in January. Website: <http://pubs.healtheffects.org/getfile.php?u=1067>

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the 2007 paper by Francine Laden et al. measured death rates during 1985–2000 among 54,000 members of the unionized U.S. trucking industry. ... This cohort, which included 36,000 diesel truck drivers, had death rates from all causes and all cancer that were substantially below the rates among US males. Furthermore, unlike earlier evidence that was used in the TAC declaration, this cohort did not have a substantially elevated lung cancer death rate.

Dr. Enstrom also indicates that the premature mortality calculation in the report, “Quantification of the Health Impacts and Economic Valuation of Air Pollution from Ports and Goods Movement in California,” is exaggerated. Dr. Enstrom’s analysis “found no relationship between PM_{2.5} and mortality in elderly Californians during 1983–2002.”

4.3.2.4 Local Policies

City of Moreno Valley General Plan Policies. Chapter 9 of the City’s General Plan defines goals and policies related to air quality within the City of Moreno Valley. The specific policies of the General Plan that are relevant to the proposed project are as follows:

Objective 6.7 Reduce mobile and stationary source air pollutant emissions.

Policy 6.7.1 Cooperate with regional efforts to establish and implement regional air quality strategies and tactics.

Policy 6.7.2 Encourage the financing and construction of park and ride facilities.

Policy 6.7.4 Locate heavy industrial and extraction facilities away from residential areas and sensitive receptors.

Policy 6.7.5 Require grading activities to comply with South Coast Air Quality Management District’s Rule 403 regarding the control of fugitive dust.

Policy 6.7.6 Require building construction to comply with the energy conservation requirements of Title 24 of the California Administrative Code.

4.3.3 Methodology

The *Air Quality, Greenhouse Gas, and Health Risk Assessment Report* for the DEIR (Michael Brandman Associates, January 2013)¹ evaluated the air quality impacts associated with the development of the proposed project including the following:

- Determine the short-term construction air quality impacts on both on-site and off-site sensitive receptors based on SCAQMD assessment methodologies and significance thresholds;
- Determine the long-term air quality impacts, including vehicular traffic, on both on-site and off-site sensitive uses based on SCAQMD assessment methodologies and significance thresholds; and
- Determine the required mitigation measures to reduce short-term and long-term on-site air quality impacts from all sources.

A revised Air Quality, Greenhouse Gas, and Health Risk Assessment Report (revised analysis) was prepared by Michael Brandman Associates – FirstCarbon Solutions (MBA-FCS) in 2015, which estimated the impacts from the reduced size of the project and also refined and updated the methodology used in the analysis, as discussed below.

¹ *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, Michael Brandman Associates, January 2013.

4.3.3.1 Construction

Construction-related emissions are expected from various activities associated with the construction of the project such as rough grading, infrastructure construction, asphalt paving, building construction, architectural coatings, and construction workers commuting. Construction emissions for construction worker vehicles traveling to and from the project site, in addition to vendor trips (construction materials delivered to the project site) and haul trips (dump trucks and concrete trucks) were also accounted for in the analysis. Localized air quality in the project area would be affected by both heavy-duty construction equipment usage on site as well as local traffic due to the equipment delivery and construction worker commuting. The anticipated construction equipment and construction schedule are identified in Section 3.0, *Project Description*, in Table 3.C. The SCAQMD CEQA methodology¹ was used to analyze the criteria pollutant emissions from these activities.

Note: In response to comments received on the DEIR, the following revisions have been made to the construction emissions analysis:

- *New Version of CalEEMod.* The construction emissions in the DEIR were estimated with the approved model at the time, CalEEMod version 2011.1.1, which uses emission factors from the outdated OFFROAD2007 and EMFAC2007 emission models. Since publication of the DEIR, a new version of CalEEMod has been released, version 2013.2, uses construction emission factors from OFFROAD2011 and mobile source emissions from EMFAC2011. The new version of CalEEMod has lower construction equipment load factors, which are also used in this revised analysis.
- *Extended Construction Period.* In the DEIR, construction was assumed to occur over 10 years; in response to comments to reduce emissions, the revised analysis construction schedule is assumed to occur over 15 years.
- *Refined Building Phasing.* The DEIR had all building construction activities lumped together. For better understanding and clarification, building construction activity was subdivided in this revised analysis into the following sub-phases: building-concrete; building-wet utilities; building-electrical; and building-landscaping to more accurately describe construction activities.
- *Mass Grading Duration.* In the DEIR, grading covered 12 months (for the unmitigated version) and 24 months (for the mitigated version). For the revised analysis, each planning area is graded separately over a total of approximately 58 months to reflect a more realistic grading plan.
- *On-Site On-road Vehicle Emissions.* On-site travel and idling emissions from concrete trucks, haul trucks, service/support trucks, and delivery trucks were not included in the DEIR but are included for the revised analysis.
- *Equipment for Grading.* The construction equipment and haul truck deliveries for the mass excavation and fine grading phases now vary per planning area (since there are varying sizes of each planning area), whereas in the DEIR, one equipment fleet was assumed for the mass grading and finish grading phases. In addition, because the grading duration has been extended and due to variations in the grading fleet based on the size of the planning area, less equipment is required. The overall construction equipment horsepower-hours per day has decreased in the revised analysis.
- *Onsite Equipment Fleet for Non-Grading Phases.* The duration for construction has been extended; therefore, the peak number of equipment has decreased. In addition, the types and daily horsepower hours for the equipment has changed.
- *Onsite Equipment Hours per Day.* The revised analysis assumes that the onsite equipment are in the on position for 10 hours per day as a project design feature. The analysis in the DEIR

¹ CEQA Air Quality Handbook, April 1993 and subsequent additions to the Handbook.

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assumed 15 hours per day for the unmitigated version and 10 hours per day for the mitigated version. Because construction has been spread out over more time, there is no need for the equipment to operate 15 hours per day; therefore, the equipment hours per day has been added as a project design feature that sets the maximum hours per day is 10 hours per day for the onsite equipment. This means that each piece of construction equipment is assumed to be on for 10 hours per day. This would also apply to the onsite equipment used during concrete pouring, which would most likely occur during the night. This is a conservative scenario as the CalEEMod default assumes construction equipment would be on for 6 to 8 hours per day. This is used to calculate maximum daily emissions which are required for the regional analysis, because project emissions can occur on any day of the week. However, in order to calculate annual average emissions, it is necessary to base emissions upon a realistic work schedule. The revised analysis assumes a more realistic annual average use of construction equipment by assuming that the maximum equipment would occur for five days per week (instead of six days per week as in the DEIR). In this way, an annual average and daily emission inventories were estimated.

- *Tier 4 Equipment.* The analysis in the DEIR assumed the CalEEMod default construction equipment tier levels for the unmitigated version and for the mitigated version, assumed Tier 3 engines for years prior to 2017 and Tier 3 with diesel particulate matter filters for years after 2017. The revised analysis assumes that for the mitigated emissions, all equipment over 50 horsepower Tier 4 as required by a revised mitigation measure.
- *VOC Emissions from Striping Pavement.* The DEIR did not include these emissions because these emissions have been recently integrated within CalEEMod.

4.3.3.2 Operation

Air quality in the project area would be affected by long-term air emissions from stationary sources and mobile sources related to the proposed project once it commences operations. The stationary source emissions would come from consumption of natural gas and emergency generators while mobile source emissions would come from vehicular emissions from automobiles and trucks traveling to, from, and within the project site and from on-site forklifts and yard trucks.

A key piece of information required to estimate the project's operational emissions deals with an estimate of the number of trips and types of vehicles (i.e., cars and trucks) generated by the project during a peak hour and on a daily basis. To determine mobile source emissions associated with the project, the trip generation rates were derived from the *Traffic Impact Analysis Report* for the project prepared by Parsons Brinckerhoff .

Appendix E of the CalEEMod Manual states the following regarding trip rates for large warehouses and distribution centers, and demonstrates that the trip rate applied for this project is appropriate, since the project is a Specific Plan containing more than 10 warehouse buildings:

In the case that air quality is evaluated for multiple warehouses (>10), such as in an analysis for a general plan, the average rate of 1.44 trips per TSF [thousand square feet] from the ITE [Institute of Transportation Engineers] 8th Edition Trip Generation manual is acceptable. This lower value may be more appropriate as on average, a small portion of warehouses can be expected to operate at varying levels of service, including some warehouses experiencing temporary partial or complete vacancy. (SCAQMD 2013, CalEEMod manual,¹ pages 14-15)

¹ South Coast Air Quality Management District. 2013. CalEEMod, Appendix E, Technical Source Documentation. Website: <http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendix.pdf?sfvrsn=2http>

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Additionally, the SCAQMD is currently working with the Institute of Transportation Engineers to provide enhanced information and guidance regarding vehicle trips associated with warehouse operations. SCAQMD staff is recommending truck trip rates from the Institute of Transportation Engineers for high cube warehouse projects located in SCAQMD. Consistent with CEQA Guidelines, the SCAQMD states that an EIR may use a non-default trip rate if there is substantial evidence indicating another rate is more appropriate for the air quality analysis. The trip generation rate applied in this assessment for high cube warehouses (1.68 trips per thousand square feet) is greater than the average rate of 1.44 trips per thousand square feet recommended in CalEEMod thereby providing a more conservative estimate of vehicle trips (i.e., larger number of trips) and hence higher estimate of air quality impacts than the SCAQMD-recommended trip rate.

The EPA AERMOD air dispersion model, the Caltrans CALINE4 model, the CalEEMod, and the CARB EMFAC 2014 mobile source emission factor model were used to assess the project's impact on air pollutant emissions and concentrations.

Emission factors for the year 2012 are used for the "worst-case" scenario. Phase 1 of the project used emission factors from the year 2022, and Phase 2 of the project used emission factors for the year 2035. For the mitigated version, the emission factors were modified to reflect the mitigation measure that requires the use of model year 2010 or newer trucks for all diesel trucks associated with the project.

Note: In response to comments received on the DEIR, the following revisions have been made to the regional operational emissions analysis:

- *Trip Lengths for Motor Vehicle Emissions.* Forecasted traffic volumes contained in the revised Traffic Impact Analysis were used to estimate the project's motor vehicle emissions instead of an arbitrary 50 miles per truck trip length and the CalEEMod default trip lengths for local trips used in the DEIR. The traffic model provided estimates of project traffic volumes for nearly 500 individual freeway and surface street roadway segments segregated by vehicle class as passenger cars, light heavy duty trucks, medium heavy duty trucks, and heavy-heavy duty trucks. This revised methodology provides a much more accurate estimate of the project's operational mobile source vehicle miles traveled and resulting emissions.
- *Updated Emission Factors for Motor Vehicles.* In the DEIR, regional motor vehicle emissions were estimated by CalEEMod using the EMFAC2007 mobile source emission model and EMFAC2011 emission model for the localized and health risk analysis. On December 30, 2014, the CARB released an updated version of its emission factor model, EMFAC2014. The CARB indicates that the EMFAC2014 mobile source emission model will be used henceforth to estimate on-road mobile source emissions in California. The EMFAC2014 model is an updated version of the EMFAC2014 model that was used in the DEIR. The EMFAC2011 mobile source emission model was applied to all vehicle classes in the revised analysis.
- *Decrease in Operational Square Footage.* The number of vehicle trips was revised to reflect a reduction of the project size from 41.6 million square feet to 40.6 million square feet and the redistribution of land use building square footage between the high cube logistics warehouse and light logistics land uses. In addition, a fire station land use was also added.
- *Additional On-site Emissions Sources.* Additional sources of operational emissions were also accounted for in this revised analysis including standby diesel generators, fork lifts, and yard trucks.
- *On-site Existing Emissions Estimated.* The existing agricultural emissions were estimated in the revised analysis; they were not estimated in the DEIR.

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4.3.3.3 Localized Construction/Operation

SCAQMD has developed the Localized Significance Threshold (LST) methodology that can be used to determine whether or not a project may generate significant adverse localized air quality impacts that substantially affect sensitive receptors. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable Federal or State AAQS and are developed based on the ambient concentrations of that pollutant for each source receptor area identified by the SCAQMD. SCAQMD's current guidelines, *Final Localized Significance Threshold Methodology* (June 2003) and subsequent additions, were adhered to in the assessment of local air quality impacts from the proposed project. The local emissions of concern from construction and operational activities as defined by the SCAQMD are NO_x, CO, PM₁₀, and PM_{2.5} combustion emissions from construction equipment and fugitive PM₁₀ dust from construction site preparation activities.

Note: In response to comments received on the DEIR, the following revisions have been made to the localized significance threshold analysis:

- *Revisions to the Traffic Volumes.* The operational assessment of localized impacts reflects the changes in traffic volumes associated with the reduction in the project size and realignment of roadway segments that are within and border the project's boundaries.
- *Changes in Construction Schedule.* The analysis in the DEIR assumed a construction schedule of 10 years, whereas the revised assessment is based on a 15-year construction schedule. The changes in construction schedule both by year and location within the project were accounted for under the revised, extended project development schedule for estimating the emissions subject to the LST assessment.
- *Emission Source Configuration.* The analysis in the DEIR of the off-road construction equipment exhaust was represented in the air dispersion model as a large area source that covered the construction area. The revised analysis represents the off-road construction exhaust emission source as a series of contiguous volume sources, which is consistent with the SCAQMD methodology for LST assessments.
- *Operational Truck Idling.* The analysis in the DEIR assumed that each heavy-duty truck that accessed the site during operation idled for a total of 15 minutes per day. In the revised analysis, each truck was assumed to idle for 5 minutes per day consistent with the California Air Resources Board's Air Toxic Control Measure that limits such idling to 5 minutes and requirements specified in the World Logistics Center Specific Plan. For the mitigated assessment, each truck was assumed to idle for 3 minutes per day.

The localized significance threshold analysis evaluated three conditions:

- Project Phase 1 (2012): this condition assumes that Phase 1 of the project is fully built out in 2012, the year that the Notice of Preparation for the project was published.
- Project Phase 1 and Phase 2 Full Build Out (2012): this condition assumes that Phase 1 and Phase 2 of the project are fully built out in 2012, the year that the Notice of Preparation for the project was published.
- Proposed Development Schedule: this condition examines the proposed development schedule of the two-phased project three analysis years were examined under this condition for potential localized air quality impacts:
 - 2021, the year when the projected construction schedule would result in construction activities in the western portion of the project adjacent to and across from the existing residential areas along Redlands Boulevard and when a substantial portion of Phase I operations would occur (approximately 56 percent of entire project floor space);

- 2027, the year when the project emissions from both project construction and operation are at their highest combined levels for several pollutants; and when construction activities would occur adjacent to the existing residences along Gilman Springs Road and
- 2035¹ when the Phase 1 and Phase 2 of the project are fully operational.

Project Phase 1 (2012) represents an interim step during which Phase 1 of the project (approximately 56 percent of the total size of the project) is completely built out in 2012. This analysis simply looks at the situation of what would happen if Phase 1 of the project were built in its entirety with no reductions in motor vehicle emissions that would occur in the future as a result of emission control programs that have already been adopted. This assessment also provides consistency with the project traffic impact analysis and noise reports which examine the Project Phase 1 (2012) condition. The project impact results are compared to the existing air quality levels in 2012 and only consider the project's operational emissions and not construction emissions.

Project Phase 1 and 2 Full Build Out 2012 represents a worst-case scenario since the project could not be physically built out in its entirety in a single year and does not reflect the fact that the project would be developed over a time period of 15 years depending on market demands for warehouse space. This assumption also does not account for the fact that emissions from mobile sources, prior to mitigation, particularly from heavy duty diesel trucks are expected to decline significantly over the next 10 to 15 years as a result of emission controls already mandated by the CARB specifically for these vehicles. This assessment also provides consistency with the project traffic impact analysis and noise reports which examine the full Project Phase 1 and Phase 2 (2012) Build Out (2012) condition. The project impact results are compared to the existing air quality levels in 2012 and only consider the project's operational emissions and not construction emissions.

The Proposed Project Development condition represents the proposed project development including the localized impacts during construction and operation over the time period of 2015 to 2035. These results are compared to the existing air quality levels in 2012.

4.3.3.4 Health Risk Assessment

A Health Risk Assessment (HRA) is a guide that helps to determine whether current or future exposures to a chemical or substance in the environment could affect the health of a population. In general, risk depends on the following factors:

- How much of a chemical is present in an environmental medium (e.g., air);
- How much contact (exposure) a person has with the contaminated environmental medium; and
- The inherent toxicity of the chemical.

The assessment of health impacts is a continuing evolution of science and regulation. Since December 2014, three major scientific and regulatory activities have come forward that will affect how such assessments are performed and what such impacts mean to society as described below.

- On December 30, 2014, the ARB released its update to the Emissions Factor Model, EMFAC2014, which is used to estimate emissions from motor vehicles in California. The

¹ In some circumstances, references are made to the year 2035. The year 2031 is the proposed first year the project is fully built out. However, detailed traffic volumes were provided by the project traffic consultant for the long-term planning year 2035. For purposes of this assessment, project traffic volumes in 2031 were assumed to be the same as the forecast volumes in 2035.

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EFAC2014 model represents the ARB's current understanding of motor vehicle technologies and regulatory implementation of rules aimed at reducing air emissions from motor vehicles. Of significance in this regard are the new projections of air emissions from heavy duty diesel engines. Based on the results of the EMFAC2014 model, emissions of diesel particulate matter range from 50 to 80 percent lower than previously estimated using the previous version of the EMFAC model, EMFAC2011. Since heavy duty trucks constitute nearly all of the project's diesel PM emissions, the incorporation of the emission information from the EMFAC2014 model is important in estimating the amount of diesel PM and in assessing the project's health risk impacts resulting from these emissions

- On January 27, 2015, the Health Effects Institute (HEI), a joint private-government partnership, released a major peer-reviewed scientific report entitled *Effects of Lifetime Exposure to Inhaled New-Technology Diesel Exhaust in Rats*. This is the first study to conduct a comprehensive evaluation of lifetime inhalation exposure to emissions from heavy-duty 2007-compliant engines (referred to as "new technology diesel exhaust," or NTDE). The study evaluated the long-term effects of multiple concentrations of inhaled NTDE, which has greatly reduced particle emissions compared with "traditional-technology diesel exhaust" (TDE) in male and female rats on more than 100 different biologic endpoints, including tumor development, and compared the results with biologic effects seen in earlier studies in rats after exposure to TDE. Lifetime inhalation exposure of rats exposed to one of three levels of NTDE from a 2007-compliant engine, for 16 hours per day, 5 days a week, with use of a strenuous operating cycle that more accurately reflected the real-world operation of a modern engine than cycles used in previous studies, did not induce tumors or pre-cancerous changes in the lung and did not increase tumors that were considered to be related to NTDE. The importance of this study is that diesel PM emissions from new technology diesel engines does not cause any increase in the risk of lung cancer or other significant adverse health effects in study animals that, in fact are more sensitive to toxic exposures than humans. While this study focused on heavy duty truck emissions, the new clean diesel technology has the potential for impacting all sectors, including passenger cars, agriculture, construction, maritime and transportation. Previous studies directed at studying the effects of diesel PM on health were based on exposure studies that date 15 to 20 years ago when diesel emissions were significantly higher than the NTDE. It is also important to highlight that the U.S. Environmental Protection Agency (EPA), the California Air Resources Board, the U.S. Department of Energy (DOE) and the U.S. Federal Highway Administration are sponsors and/or reviewers of this study in conjunction with the manufacturers of emissions control equipment.
- On March 6, 2015, the California Office of Environmental Health Hazards Assessment (OEHHA) adopted a new guidance for estimating health risks from toxic air contaminants that incorporated the importance of early-in-life sensitivities of young children to exposures to toxic air contaminants and recommends a lifetime exposure duration of 30-years. Within the context of this assessment, this new assessment guidance is referred to as the "Current OEHHA Guidance". The new guidance updates earlier guidance recommended by OEHHA and SCAQMD referred to in this assessment as the "Former OEHHA Guidance", which was used in the DEIR. The "Former OEHHA Guidance" is based on a lifetime exposure of 70 years and does not incorporate early-in-life age sensitivity factors. The importance of the "Current OEHHA Guidance" is that the guidance produces much more conservative estimates of cancer risks from toxic air contaminant exposures than the "Former OEHHA Guidance".
- The HRA is being provided to allow decision makers to see the cancer-related impacts of the proposed project in the assumption that new technology diesel exhaust cause cancer, contrary to what was found by the HEI study.

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The following information is from the Health Risk Assessment contained in the revised *Air Quality, Greenhouse Gas, and Health Risk Assessment* (2015) contained in Appendix D. The text in this section is supported by references and discussion that can be found in the report in Appendix D.

Note: In response to comments received on the DEIR, the following revisions have been made to the health risk assessment:

- *Revisions to the Construction Emissions.* This revised analysis reflected the numerous changes in construction equipment, load factors, schedule, and sequencing of construction by location within the project as discussed above.
- *Revisions to Traffic Volumes.* The revised analysis made use of the revised traffic volume forecasts along nearly 500 individual roadway segments.
- *Expanded Model Extent.* The geographic extent of the air dispersion model domain was expanded to include freeway segments to the ports of Los Angeles and Long Beach.
- *Organic Gas Emissions Included.* The assessment of acute non-cancer hazards was expanded to examine the impacts of the toxic components of the project's total organic gas emissions from gasoline and diesel vehicles. The analysis in the DEIR focused on diesel PM to derive health impacts from the project.
- *Calculated Cancer Population Burden.* The health risk assessment was extended to include the computation of cancer population burden attributed to the project's diesel PM emissions.
- *Maximum Exposure Duration for Sensitive/Residential Receptors.* The analysis contained in the DEIR assumed a cancer risk exposure time period of 70 years for sensitive/residential receptors as representative of the "Former OEHHA Guidance" in estimating cancer risks. In this revised assessment, the cancer risk are presented using the "Current OEHHA Guidance." The "Current OEHHA Guidance" incorporates early-in-life exposure sensitivities and recommends an exposure duration of 30-year; the "Current OEHHA Guidance" reflects early age sensitivities¹ (i.e., weighting the effects of exposure more heavily for infants and teenagers than for adults) to toxic compounds and the US Census data showing that 90 percent of individuals live in their residence for 30 years or less; overall the "Current OEHHA Guidance" results in a more conservative analysis of cancer risks than "Former OEHHA Guidance" on performing health risk assessments.
- *Maximum Exposure Duration for Worker Receptors.* The analysis contained in the DEIR assumed a cancer risk exposure time period of 40 years for workers as recommended in the "Former OEHHA Guidance." In this revised assessment, the cancer risk impacts are presented for the "Current OEHHA Guidance" which assumes an exposure duration of 25 years for worker receptors, which is based on labor statistics showing 95 percent of workers stay in the same job for 25 years or less.
- *Include School Receptors.* The assessment of cancer risks at local school receptors was included in the revised analysis based on the "Current OEHHA Guidance", including the new proposed high school site #5 located north of SR-60. The analysis for the high school #5 is included in the Revised Air Quality Report (Appendix D).
- *Buffer Analysis.* The mitigated analysis includes assessment of cancer risks with a buffer of 250 feet (the project design) and 1,000 feet between the project's operational emissions and the centerlines of Redlands Boulevard, Gilman Springs Road, Bay Avenue, and Merwin Street. This assessment is included as a response to comments on the DEIR. The analysis found that a 1,000 foot buffer would result in no substantial reduction in the cancer risk impacts.

¹ [Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, Section 8.2, http://www.oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf](http://www.oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf)

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The HRA examines the regional nature of the project's potential health risk impacts over a multi-year time period. The HRA methodology applies a risk characterization model to the results from an air dispersion model to estimate potential health risks at each sensitive receptor location. Because of the pervasive nature of diesel particulate matter (diesel PM) in contributing to estimated health risks in California, the focus of this assessment is on estimating the health risks from diesel PM. While the project activities may result in the emission of other TACs (e.g., Total Organic Gases (TOG) from diesel and gasoline-powered vehicles), diesel PM from the project was found to contribute approximately 98 percent of the total cancer risk from project operations (see the revised *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, Appendix D of this EIR). TOG emissions from diesel and gasoline vehicles were, however, included in the assessment of acute non-cancer hazards.

The HRA process involves four main steps: hazard identification, dose-response assessment, exposure assessment, and risk characterization.

- **Hazard Identification:** Hazard identification is the process by which contaminants of concern are selected for investigation in the risk assessment, and includes a review of the chemicals that are potentially released to the atmosphere from the equipment of concern. This assessment is responsive to the emissions of various toxic air contaminants from the construction and operation of the project. The main toxic air contaminants associated with the project include diesel PM from diesel-fueled equipment and total organic gases (TOG) from both gasoline and diesel vehicles.
- **Dose-Response Assessment:** The dose-response assessment develops relationships between exposures to a given chemical and the corresponding potential health effects associated with exposure to that chemical. In general, data are limited regarding adverse effects associated with direct exposure to humans to a particular chemical. Therefore, animal experiments have often been performed to assess a chemical's toxicity. These experiments are conducted to determine the organs that are adversely affected by a toxic chemical and the amount of the chemical needed to produce an adverse effect on the organ. Two types of adverse health effects are generally considered in health risk assessments: carcinogenic and non-carcinogenic. Carcinogenic compounds are not considered to have threshold levels (i.e., dose levels below which there are no risks). Any exposure, therefore, will have some associated risk. Chemicals that potentially produce carcinogenic effects have been shown or are suspected to produce tumors in animals or humans. Non-carcinogenic effects, such as liver or kidney damage, may be either reversible or permanent. In these situations, it is assumed that there is a level of exposure at which these chemicals produce no adverse effects in the human body. In other words, exposure to these chemicals in amounts less than a threshold level will result in no adverse health effects. The toxicity assessment characterizes the relationship between the magnitude of exposure and the nature and magnitude of adverse health effects that may result from such exposure
- **Exposure Assessment** identifies potential exposure pathways, estimates chemical concentrations at potential exposure points, and calculates expected doses of emitted substances. An exposure pathway is defined as the means by which an individual or a population is exposed to contaminants that originate from a source. Each pathway represents a different mechanism for exposure. An exposure pathway is defined as the means by which an individual or a population is exposed to contaminants that originate from a source. For this purpose, an air dispersion model (the USEPA AERMOD regulatory model), is used to estimate the toxic air concentrations at locations within and surrounding the project.
- **Risk Characterization** is the process of combining dose-response information with the estimates of human exposure in order to derive a quantitative estimate of the likelihood that humans will experience any adverse health effects for the given exposure assumptions. Two general types of health effects are generally considered: potential carcinogenic risks after chronic (long-term)

exposure and potential non-carcinogenic health impacts following chronic (long-term) and acute (short-term) exposure. Each of these health effects was evaluated in this report.

Estimation of Cancer Risks. Excess cancer risks¹ are estimated as the upper-bound incremental probability that an individual will develop cancer over a lifetime as a direct result of exposure to potential carcinogens over a specified exposure duration. The estimated risk is expressed as a unit-less probability. The cancer risk attributed to a chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). A risk level of 1 in a million implies a likelihood that up to one person, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time.

The health risk assessment methodology that was included in the DEIR for estimating cancer risks is described below. This methodology, taken from the AB2588 Hot Spot program, estimates cancer risks over a 70-year lifetime of exposure and includes assumptions concerning individual rates of the inhalation of air. This methodology is referred to as the “Former OEHHA Guidance” since it has been updated by OEHHA since the circulation of the DEIR. The “Former OEHHA Guidance” also provides for an estimate of off-site worker exposures over a 40-year duration.

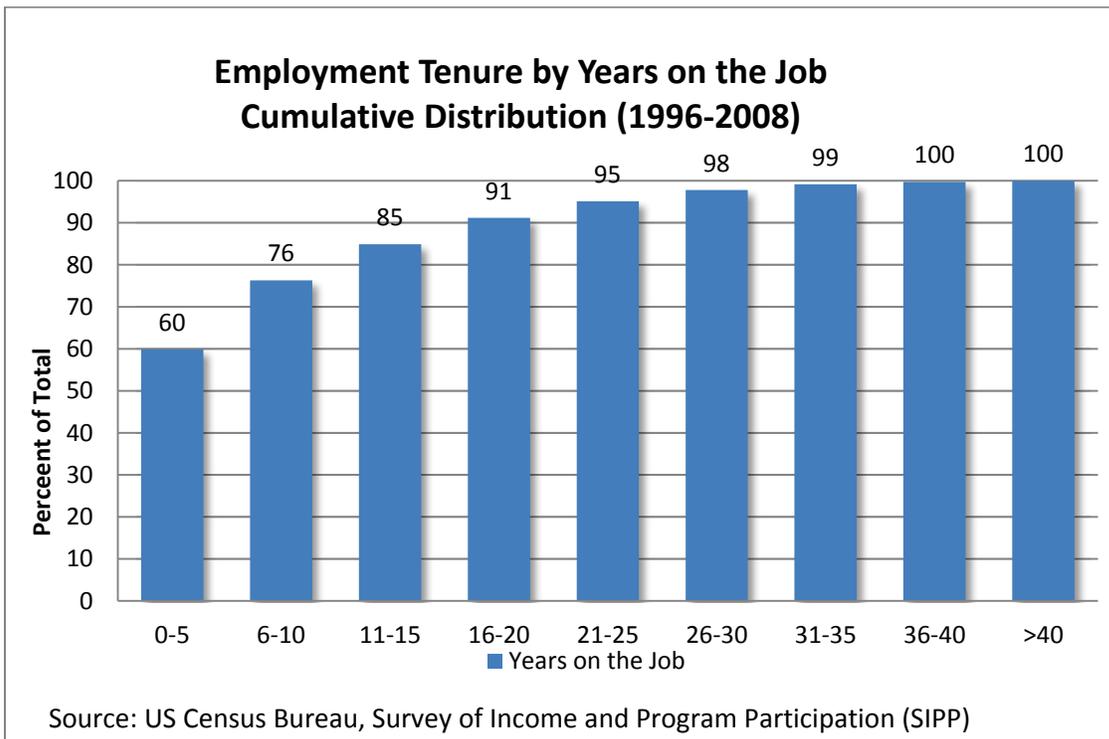
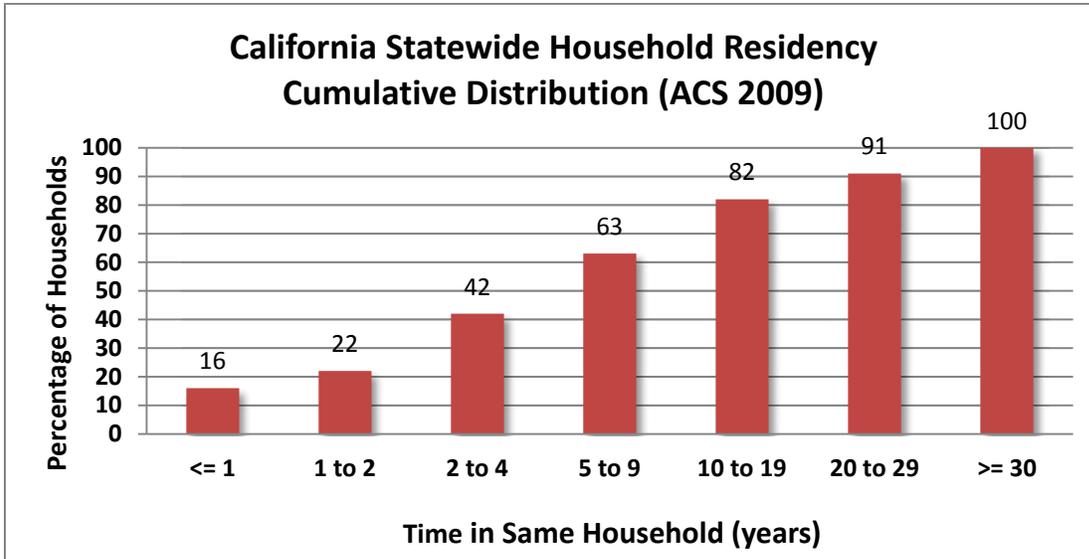
On March 6, 2015, the OEHHA released its final version of the document. *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments.* This Guidance Manual has been developed by OEHHA, in conjunction with CARB, for use in implementing the Air Toxics Hot Spots Program (Health and Safety Code Section 44360). OEHHA is required to develop guidelines for conducting health risk assessments under the Air Toxics Hot Spots Program (Health and Safety Code Section 44360 (b) (2)). OEHHA earlier developed three Technical Support Documents (TSDs) in response to this statutory requirement, which provided the scientific basis for values used in assessing risk from exposure to facility emissions. The three TSDs describe non-cancer risk assessment (derivation of acute, 8-hour and chronic reference exposure levels), derivation of cancer potency factors, and exposure assessment methodology including stochastic risk assessment. The Guidance incorporates the awareness of the sensitivity of early-in-life exposures to toxic air contaminants for sensitive receptors. The methodology is referred to in this document as the “Current OEHHA Guidance.”

The “Current OEHHA Guidance” provides for a 30-year lifetime exposure for sensitive receptors along with assumptions on age-specific sensitivity factors, daily breathing inhalation rates, and time at home estimates. The “Current OEHHA Guidance” also provides for a 25-year exposure duration for off-site worker receptors. To date, the technical support documents relative to the “Current OEHHA Guidance” have been finalized by the OEHHA relative to the AB2588 Hot Spots program, has been adopted by the CARB, and SCAQMD has initiated the process to adopt the guidance for AB2588 assessments and application to CEQA air quality impact assessments. This revised assessment estimates the project’s health risk impacts under the “Current OEHHA Guidance”. The changes in the “Current OEHHA Guidance” result in a more conservative estimate of cancer risks resulting from the incorporation of early-in-life exposures compared to the “Former OEHHA Guidance”. The HRA is being provided to allow decision makers to see the cancer-related impacts of the proposed project in the assumption that new technology diesel exhaust cause cancer, contrary to what was found by the HEI study. The estimation of cancer risk involves the specification of several parameters including the concentration level of the toxic air contaminant (for purposes of this assessment diesel PM10 exhaust), the rate of inhalation of the toxic, the exposure frequency (number of days per year), the exposure duration in years, the time period over which the exposure takes place, what is termed a slope factor that represents an upper bound on the increased cancer risk from a lifetime exposure to

¹ Excess cancer risk is the risk from exposure to a source of air toxics that is over and above any cancer risk borne by a person not exposed to these air toxics.

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a toxic by ingestion or inhalation and early-in-life age sensitivity factors. The values of these parameters depend on the type of receptor, i.e., sensitive/residential, worker, and student as discussed below.



Cancer Risk Exposure Assumptions. The principal focus of this HRA is on the potential health impacts to sensitive/residential receptors located within and surrounding the project site, based on the assumption that diesel exhaust can cause cancer. Sensitive receptors include hospitals, schools, daycare facilities, elderly housing and convalescent facilities. Residences are also considered sensitive receptors. An important parameter necessary to estimate cancer risk requires the

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specification of the duration of exposure of an individual to toxic air contaminants. An assessment of population mobility can assist in determining the length of time a residential receptor is exposed in a particular location. For example, the duration of exposure to a source of toxic air contaminants will be directly related to the period of time residents live near the source of the emissions.

Table 4.3.G summarizes the primary exposure assumptions used to calculate individual cancer risk by receptor type for the “Current OEHHA Guidance.”

Table 4.3.G: Exposure Assumptions for Cancer Risk for “Current OEHHA Guidance” (new table)

Type of Guidance	Receptor Type	Exposure Frequency		Exposure Duration (years)	Age Sensitivity Factors	Time at Home Factor (%)	Daily Breathing Rate (L/kg-day)
		Hours/day	Days/year				
Current OEHHA Guidance	Sensitive/Residential:						
	3 rd Trimester	24	350	0.25	10	.85	361
	0-2 years	24	350	2	10	85	1090
	3-16 years	24	350	14	3	72	745
	Older than 16 years	24	350	14	1	73	290
	Student	8	180	9	3	72	745
	Worker	8	250	25	1	NA	230

(L/kg-day) = liters per kilogram body weight per day
The daily breathing rates shown are the 95th percentile rate as recommended by the OEHHA.
Source: OEHHA 2014

The underlying factors used in the analysis exemplify the conservative nature of utilizing the exposure scenarios and the underlying assumptions:

- The residential cancer risk calculation assumes that each resident will be exposed to diesel particulate matter (diesel PM) and organic gases for 24 hours a day for 350 days a year at the location of his or her home throughout the entire 30 year residential exposure period.
- The worker cancer risk calculation assumes that workers are exposed to diesel PM for 8 hours a day for 250 days a year, next to, but outside of the buildings in which they work.
- The atmospheric dispersion model and traffic model that are used to estimate risks generally provide impact estimates that are over-estimates based on the use of conservative model assumptions.

Other Factors that Influence Health Risk Estimates: Conservative Trip Estimates. It should also be noted that the traffic analysis used a conservative estimate of the number of truck trips after the project begins operation. This is important because diesel PM emissions are directly related to both the number of trucks and the vehicle miles traveled.

The traffic analysis in the EIR used the traffic generation rate for high-cube warehouses suggested by the Institute of Traffic Engineers (“ITE”) which is based on traffic counts from a number of large warehouses located in California and elsewhere in the United States. This rate was also compared to the trip generation rate actually resulting from the Skechers warehouse immediately adjacent to the project. The Skechers warehouse is representative of the warehouses planned for the project. The ITE trip generation rate is three times greater than the Skechers warehouse traffic counts (see Table 4.15.K in the revised EIR). Because the project analysis used a higher trip generation rate, the vehicle miles traveled are also higher. The combination of the conservative forecasts of traffic and of the miles traveled means that the calculation of the cancer risk in the EIR overstates the extent of that risk regardless of the exposure period used.

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Cancer Burden. Whereas cancer risk represents the probability of an individual to develop cancer, cancer burden multiplies the cancer risk by the exposed population to estimate the number of individuals that would be expected to contract cancer from the project. The exposed population is defined as the number of persons within a facility's zone of impact, which is typically the area exposed to an incremental cancer risk of one in a million from the project. Consistent with this definition, cancer burden was calculated by first identifying all population census tracts¹ located within the project's zone of impact, multiplying the estimated incremental project cancer risk impact in the census tract by the population of the census tract and then summing all of products of population times estimated cancer risk in the zone of impact. Note that each census tract contributes to the cancer burden in proportion to its population and risk. For example, if a census tract has a relatively high estimated cancer risk, but no people living there, it will not contribute to the estimation of the cancer burden. As provided in the "Current OEHHA Guidance", the cancer burden is calculated assuming a 70-year exposure duration along with the appropriate exposure frequency, daily breathing rates, age sensitivity factors, and time at home factors appropriate to each age group².

Non-cancer Hazards. Separate from cancer risk impacts, exposures to TACs such as diesel PM can also cause chronic (long-term) and acute (short-term) related non-cancer illnesses such as reproductive effects, respiratory effects, eye sensitivity, immune effects, kidney effects, blood effects, central nervous system, birth defects, or other adverse environmental effects. Risk characterization for non-cancer health risks from TACs is expressed as a hazard index (HI). The HI is a ratio of the predicted concentration of a project's emissions to a concentration considered acceptable to public health professionals, termed the Reference Exposure Level (REL). This is a separate and distinct analysis from the analysis conducted for cancer risk. A significant risk is defined by the SCAQMD as an HI of 1 or greater. The California OEHHA has assigned a chronic non-cancer REL of 5 µg/m³ for diesel PM (OEHHA 2011). Diesel PM has effects on the respiratory system, which accounts for essentially all of its potential chronic non-cancer hazards. Therefore, the only HI calculated was for the respiratory system.

Exposures to toxics air contaminants can also have short-term or acute non-cancer effects, typically dealing with exposures over an hour or so. The California OEHHA has not defined a reference exposure level for diesel PM appropriate for estimating acute non-cancer hazards from diesel PM. Therefore, to estimate the potential acute non-cancer impacts from the project, it was necessary to examine the various individual chemical components (or chemical species) that comprise the emissions from both diesel vehicles and gasoline vehicles. For this purpose, use was made of emission source profiles that provide estimates of the various chemical components that comprise the exhaust from diesel and gasoline vehicles. From this information, an estimate can be made of the maximum one-hour average concentration levels of the project's various chemical species from which an acute non-cancer hazard index can be determined.

Morbidity and Mortality. Respirable particulate matter is a public health concern as it is known to impact both the respiratory and cardiovascular systems. Respirable particulate matter deposition in the lungs and penetration into the bloodstream (for the smallest particles) triggers a range of inflammation responses and exacerbates health problems such as asthma and chronic bronchitis. Individuals susceptible to higher health risks from exposure to airborne particulate matter (PM₁₀ and PM_{2.5}) include children, the elderly, smokers, and people of all ages with low

¹ A census tract is a geographic region defined for the purpose of taking a census. Usually these regions coincide with the limits of cities, towns, or other administrative areas. Each tract has a unique numeric code and averages about 4,000 inhabitants. The census tract centroid is the geographic center of the tract based on a weighted distribution of the population within the tract using the census blocks that comprise the tract. A census block is the smallest geographic unit used to tabulate population and each tract can be comprised of several blocks.

² Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, Section 8.1, http://www.oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf

pulmonary/cardiovascular function. The CARB reviewed and summarized the toxic health effects (i.e., mortality and morbidity) of PM exposure and presented a health effect model attempting to quantify these impacts based on concentration-response functions (C-R functions). This CARB model has been used, for example, to estimate the number of cases of disease and premature deaths linked to PM and ozone exposure from ports and goods movement in California.

The CARB model has also been used to quantitatively assess project-specific incremental levels of public mortality and morbidity, however, such calculations are subject to significant uncertainty. Sources of uncertainty include emission estimates, population exposure estimates, concentration-response functions, baseline rates of mortality and morbidity that are entered into C-R functions, and occurrence of additional not-quantified adverse health effects. It should be noted that the nature of PM as a complex mixture of various pollutants, as well as the confounding health effects of pollutants such as sulfur dioxide, NO₂, CO, and O₃ that tend to co-occur with PM in ambient air, greatly increase the complexity of deriving accurate PM concentration-response functions. Health risk estimates derived in the presence of significant uncertainty tend to rely on very conservative assumptions that may greatly overestimate the potential adverse health effects. Risk assessment has various uncertainties in the methodology and is therefore deliberately designed so that risks are not under predicted.

Despite a number of uncertainties in the analysis methodology, the expected increase in mortality and morbidity was calculated for the project's toxic air emissions.

Geographic Scope of the Health Risk Assessment. The HRA is characterized by two important differences from the localized significance threshold assessment for criteria pollutants. According to the SCAQMD localized significance threshold assessment methodology, the assessment of localized impacts addresses only those emissions that are generated "onsite", that is for the purposes of this project, emissions generated from within or along the boundaries of the Specific Plan. However, for the HRA, both the universe of the project's emission sources and air dispersion model receptors were greatly expanded to assess the regional impact of the project's emissions of toxics. For this purpose, the project's toxics emission sources included over 500 individual arterial road and freeway mainline segments in the region that extended from North Palm Springs to Long Beach in the east-west direction and from Rancho Cucamonga to Hemet/San Jacinto in the north-south direction, roughly an area of 3,500 square miles. The study area for the arterial roads covered all intersections in the City of Moreno Valley of a collector or higher classification street with another collector street or higher classification street at which the project would add 50 or more peak hour trips. The study area included the main arterial routes between the project and neighboring communities of Riverside, Perris, Beaumont, San Jacinto, Hemet, and Redlands.

The study area for freeways was selected to cover the freeway routes radiating from the project site to the north, south, east, and west. The analysis covered major portions of the following freeways from North Palm Springs to the ports of Los Angeles and Long Beach: Interstate 10, State Route 60, State Route 91, Interstate 215, and Interstate 710.

The generation of emissions from traffic traveling along the various arterial and freeway mainline roadway segments requires information on traffic volumes, length of segment, and emission factors. The emission factors, in turn, depend on vehicle type, speed, calendar year, and fuel type. Estimates of daily and peak hour vehicle volumes and types (passenger cars, light heavy duty trucks, medium heavy duty trucks, and heavy-heavy duty trucks) were provided by the traffic consultant for each roadway segment analyzed. The physical length and width of each roadway segment were estimated using the segment location as provided by the traffic consultant and aerial photographs available from Google Earth. Vehicle speeds for each roadway segment and vehicle type were estimated based on posted speed limits and peak morning and afternoon average speeds taken from the 2012 Regional Transportation Plan for the years 2008 and 2035 (Southern California Association of Governments 2012). Segment speeds were adjusted to account for stop signs and traffic lights and other stoppages

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by reducing the prevailing vehicle speeds by 5 to 10 mph. The various roadway parameters are provided in Appendix D.

The expanded geographic scope of the assessment also necessitated an expansion in the locations of the receptors where the project's impacts were calculated. This expanded network included locations of individual schools within the Moreno Valley School District and over 2,300 census tract centroid locations.

Finally, it is recognized that because of the large geographical extent of the region covered in this HRA, meteorological conditions differ for different portions of the study region. The most frequent wind direction patterns in the Riverside and Moreno Valley areas are from the northwest direction as represented by the SCAQMD Riverside air monitoring station. In contrast, the most frequent wind directions along the SR-60 and SR-91 west of SR-71 in the La Habra and Anaheim areas are generally from the southwest. Because of these wind differences, it was necessary to separate the air dispersion modeling into two separate pieces as follows. Those emission sources located east of SR-71 were assumed to be influenced by the meteorological conditions represented by the Riverside meteorological data. Those emission sources located west of SR-71 were assumed to be influenced by the meteorological conditions represented by the Anaheim meteorological data. The air dispersion modeling was done separately for the region east of SR-71 and for the region west of SR-71. The air pollutant concentrations at each receptor location were then comprised as the sum of the emission impacts from those sources located east of SR-71 and west of SR-71 as influenced by their respective meteorological conditions.

The health risk analysis examined the following condition:

- Proposed Project Development condition which examines the effect of project-related construction and operational traffic diesel PM emissions as if the project were built out in accordance with its proposed phased construction and operational buildout schedule commencing with the construction of Phase 1 in 2015, build out of Phase 1 in 2022, and the final full build out in 2035. This condition forms the basis for quantifying the incremental impacts from the project.

Annual average diesel PM emissions and impacts were calculated for each year starting from 2015 based on the assumption that diesel exhaust can cause cancer. Specifically, annual average diesel PM concentrations were estimated from the diesel PM construction emissions for each year of construction from 2015 to 2030 according to the construction schedule and equipment usage projected for each year of construction. Proposed Project Development examines project impacts resulting from the proposed construction and operation of the project from the commencement of construction in 2015 for a 30-year duration for sensitive/residential receptors, 25-year for worker receptors, and 9-year exposure time periods for school-site student receptors. Annual average diesel PM emissions and impacts during operation were estimated for the years 2022 and 2035, years for which detailed traffic information was available from the traffic impact report. The annual average operational diesel PM impacts were then interpolated among three calculation years: 2015 (operational emissions were assumed to be zero in this year), 2022 and 2035 based on the amount of square-footage of buildings brought online during each year. Annual average diesel PM concentrations for the years beyond 2035 were set to the year 2035 levels.

During years when both construction and operations occur simultaneously (2016 to 2030), the annual diesel PM concentrations at the sensitive receptors from construction were added to the annual diesel PM concentrations from operations to provide a total impact assessment of all diesel PM emissions from the project during each year. The resulting total annual average diesel PM concentrations calculated each year for the exposure time period (individual annual averages) multiplied by the requisite daily breathing rates, age sensitivity factors, and time-at-home factors for each year of exposure assuming the a child of age zero (within the mother's womb) commences its lifetime

exposure in year 2015. The HRA is being provided to allow decision makers to see the cancer-related impacts of the proposed project in the assumption that new technology diesel exhaust cause cancer, contrary to what was found by the HEI study. The revised mitigation conditions require that all diesel trucks accessing the project during operation be model year 2010 or newer and that all on-site equipment be Tier 4. The results of the HEI Study indicate that the project mitigation requiring the application of Model Year 2010 engines as well as the use of Tier 4-compliant off-road construction equipment are not expected to result in emissions that would be associated with the formation of cancer in exposed individuals.

4.3.4 Thresholds of Significance

Based on Appendix G of the *CEQA Guidelines*, air quality impacts would occur if the proposed project would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations; and/or
- Create objectionable odors affecting a substantial number of people.

In addition to the Federal and State AAQS, there are daily emissions thresholds for construction and operation of a proposed project in the Basin. The Basin is administered by the SCAQMD, and guidelines and emissions thresholds established by the SCAQMD in its *CEQA Air Quality Handbook*¹ and subsequent additions to the Handbook were used in this analysis. It should be noted that the emissions thresholds were established based on the attainment status of the air basin with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution related to air quality and health risks.

4.3.4.1 Thresholds for Construction Emissions

The following CEQA significance thresholds for construction emissions have been established by the SCAQMD for the Basin:

- 75 pounds per day of VOC, also known as reactive organic compounds (ROC).
- 100 pounds per day of NO_x.
- 550 pounds per day of CO.
- 150 pounds per day of PM₁₀.
- 150 pounds per day of SO_x.
- 55 pounds per day of PM_{2.5}.

¹ *CEQA Air Quality Handbook*, April 1993.

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Projects in the Basin with construction-related emissions that exceed any of the emission thresholds are considered to be significant under CEQA.

4.3.4.2 Thresholds for Operational Emissions

Projects with operation-related emissions that exceed any of the emission thresholds listed below are considered significant under the SCAQMD guidelines.

- 55 pounds per day of VOC, also known as ROC.
- 55 pounds per day of NO_x.
- 550 pounds per day of CO.
- 150 pounds per day of PM₁₀.
- 150 pounds per day of SO_x.
- 55 pounds per day of PM_{2.5}.

4.3.4.3 Air Pollutant Standards for CO with Localized Effects

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and Federal CO standards (previously referenced Table 4.2.A). If ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or Federal standard, project emissions are considered significant if they increase one-hour CO concentrations by 1.0 ppm or more or eight-hour CO concentrations by 0.45 ppm or more. The Basin meets State and Federal attainment standards for CO; therefore, the proposed project would have a significant CO impact if project emissions result in an exceedance of State or Federal one-hour or eight-hour standard. The following emission concentration standards for CO, based on the SCAQMD *CEQA Air Quality Handbook* (1993), apply to the proposed project:

- California State one-hour CO standard of 20.0 ppm.
- California State eight-hour CO standard of 9.0 ppm.

4.3.4.4 Localized Significance Thresholds

The SCAQMD published its *Final Localized Significance Threshold Methodology* in June 2003, revised July 2008) and *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM_{2.5} Significance Thresholds* (October 2006), recommending that all air quality analyses include a localized assessment of both construction and operational impacts on the air quality of nearby sensitive receptors. LSTs represent the maximum emissions from a project site that are not expected to result in an exceedance of Federal or State AAQS. LSTs are based on the ambient concentrations of that pollutant within the Source Receptor Area (SRA) where a project is located and the distance to the nearest sensitive receptor. The project site is located in the northern portions of SRAs 24 (Moreno Valley) and 28 (San Jacinto).

In the case of CO and NO₂, if ambient levels are below the air standards for these pollutants, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or Federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM₁₀ and PM_{2.5}, both of which are nonattainment pollutants in the Basin. For these latter two pollutants, the significance criteria are the pollutant concentration thresholds

presented in SCAQMD Rules 403 and 1301. The Rule 403 threshold of $10.4 \mu\text{g}/\text{m}^3$ applies to construction emissions (and may apply to operational emissions at aggregate handling facilities). The Rule 1301 threshold of $2.5 \mu\text{g}/\text{m}^3$ applies to non-aggregate handling operational activities.

Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. There are currently seven occupied single-family homes and associated ranch/farm buildings in various locations on the proposed project site. These residences are existing on-site sensitive receptors. The nearest off-site existing sensitive receptors in the vicinity of the proposed project site are the residences located along Bay Avenue, Merwin Street, and west of Redlands Boulevard, and scattered residences along Gilman Springs Road.

Following the SCAQMD LST methodology, for sites larger than 5 acres, air dispersion modeling needs to be conducted. Because the project site greatly exceeds 5 acres, the localized significance for project air pollutant emissions was determined by performing dispersion modeling to determine if the pollutant concentrations would exceed relevant significance thresholds established by the SCAQMD.

The following LSTs were applied to the construction and operation of the project:

- 0.18 ppm (State 1-hour); 0.100 ppm (Federal 1-hour); and 0.03 ppm (Annual) of NO_2 for construction or operations.
- 20 ppm (1-hour) and 9.0 ppm (8-hour) of CO for construction or operation.
- $10.4 \mu\text{g}/\text{m}^3$ (24-hour) and $1 \mu\text{g}/\text{m}^3$ of PM_{10} (Annual) for construction.
- $2.5 \mu\text{g}/\text{m}^3$ (24-hour) and 1.0 ppm (Annual) of PM_{10} for operations.
- $10.4 \mu\text{g}/\text{m}^3$ (24-hour) of $\text{PM}_{2.5}$ for construction.
- $2.5 \mu\text{g}/\text{m}^3$ (24-hour) of $\text{PM}_{2.5}$ for operation.
- Note that when construction and operational activities occur at the same time, the SCAQMD recommends application of the significance thresholds for operation apply in determining emission significance

4.3.4.5 Health Risk Significance Thresholds

For pollutants without defined significance standards or air contaminants not covered by the standard criteria cited above, the definition of substantial pollutant concentrations varies. For toxic air contaminants (TAC), “substantial” is taken to mean that the individual cancer risk exceeds a threshold considered to be a prudent risk management level.

The SCAQMD has defined several health risk significance thresholds that it recommends to Lead Agencies in assessing a project’s health risk impacts. The City of Moreno Valley has not adopted its own set of thresholds. Therefore, the following SCAQMD thresholds were adopted for the project.

- **Maximum Individual Cancer Risk and Cancer Burden (MICR).** MICR is the estimated probability of a potential maximally exposed individual contracting cancer as a result of exposure to TACs over the applicable exposure period.

A significant impact would occur for:

- (A) An increased MICR greater than 10 in 1 million at any receptor location; or
- (B) A cancer burden greater than 0.5

- **Chronic Hazard Index.** This is the ratio of the estimated long-term level of exposure to a TAC for a potential maximally exposed individual to its chronic reference exposure level. A reference

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exposure level is the exposure level below which an adverse health effect will not occur as determined by health professionals. The Chronic Hazard Index calculations include multi-pathway consideration, when applicable.

A significant impact would occur if the increase in total chronic hazard index for any target organ system due to exposures to total TAC emissions from the project exceeds 1.0 at any receptor location.

- **Acute Hazard Index.** This is the ratio of the estimated maximum one-hour concentration of a TAC for a potential maximally exposed individual to its acute reference exposure level, the exposure level below which an adverse health effect will not occur as determined by health professionals.

A significant impact would occur if the increase in total acute Hazard Index for any target organ system due to exposure to total TAC emissions from the project exceeds 1.0 at any receptor location.

4.3.5 Less than Significant Impacts

The following impacts were determined to be less than significant. For each of the following issues, either no impact would occur (therefore, no mitigation would be required) or adherence to established regulations, standards, and policies would reduce potential impacts to a less than significant level.

4.3.5.1 Odors

Threshold	Would the proposed project create objectionable odors affecting a substantial number of people?
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The SCAQMD recommends that odor impacts be addressed in a qualitative manner. Such an analysis shall determine whether the project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality.

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors.

SCAQMD Rule 402 dictates that air pollutants discharged from any source shall not cause injury, nuisance, or annoyance to the health, safety, or comfort of the public. With the exception of short-term construction-related odors (e.g., equipment exhaust, paint, and asphalt odors), the proposed uses that would be developed on the proposed site do not include uses that are generally considered to generate offensive odors (e.g., agricultural uses, wastewater treatment plants, or landfills). While the application of architectural coatings and installation of asphalt may generate odors, these odors are temporary and not likely to be noticeable beyond the project boundaries. SCAQMD Rules 1108 and 1113 identify standards regarding the application of asphalt and architectural coatings, respectively.

SCAQMD Rule 1108 sets limitations on ROG (reactive organic gases), which are similar to and for the purposes of this EIR equivalent to and therefore interchangeable with volatile organic compounds (VOC) content in asphalt. This rule is applicable to any person who supplies, sells, offers for sale, or manufactures any asphalt materials for use in the Basin. Rule 1113 of the SCAQMD deals with the selling and application of architectural coatings. Rule 1113 is applicable to any person who supplies, sells, offers for sale, or manufactures any architectural coating for use in the Basin that is intended to be applied to buildings, pavements, or curbs. This rule is also applicable to any person who applies or

solicits the application of any architectural coating within the Basin. Rule 1113 sets limits on the amount of VOC emissions allowed for all types of architectural coatings, along with a time table for tightening the emissions standards in the future. Compliance with Rule 1113 means that architectural coatings used during construction would have VOC emissions that comply with these limits. In addition, pursuant to Mitigation Measure 4.3.6.2C, the project would be required to use low VOC paints.

The SCAQMD indicates that the number of overall complaints has been declining. Between 2003 and 2007, odor complaints made up 50 to 55 percent of the total nuisance complaints. Over the past decade, odor complaints from paint and coating operations have decreased from 27 to 7 percent and odor complaints from refuse collection stations have increased from 9 to 34 percent.

Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Diesel exhaust would also be emitted during operation of the project from the long-haul trucks that would visit the project site. However, the concentrations would not be at a level to result in a negative odor response at nearby sensitive or worker receptors. In addition, modern emission control systems on diesel vehicles since 2007 virtually eliminate diesel's characteristic odor.

During blow-down maintenance activities, natural gas odors will be present around the SDG&E Compressor Plant located on the project site. When this portion of the WLC Specific Plan is developed, these odors will occasionally be detectable from the industrial warehouse properties adjacent to the SDG&E facility. These odors will be infrequent and odorized natural gas will not be present in high concentrations. Therefore, potential odor impacts from on-site natural gas operations are considered to be less than significant and do not require mitigation.

Adherence to applicable provisions of these rules is standard for all development within the Basin. In addition, conditions for the design of waste storage areas on the proposed site would be established through the permit process to ensure enclosures are appropriately designed and maintained to prevent the proliferation of odors. Solid waste generated by the proposed on-site uses will be collected by a contracted waste hauler, ensuring that any odors resulting from on-site uses would be adequately managed. Therefore, impacts associated with this issue would be less than significant and no mitigation is required.

4.3.5.2 Long-Term Microscale (CO Hot Spot) Emissions

Threshold	Would the proposed project violate any air quality standard or contribute substantially to an existing or projected air quality violation? For CO, the applicable thresholds are: <ul style="list-style-type: none">- California State one-hour CO standard of 20.0 ppm; and- California State eight-hour CO standard of 9.0 ppm.
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Vehicular trips associated with the development of the proposed project could contribute to congestion at intersections and along roadway segments in the project vicinity resulting in potential local CO "hot spot" impacts. The primary mobile source pollutant of local concern is CO, which is a direct function of vehicle travel speeds and idling time and, thus, traffic flow conditions. CO transport is extremely limited; it disperses rapidly with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations proximate to a congested roadway or intersection may reach unhealthful levels affecting local sensitive receptors (residents, schoolchildren, etc.). High CO concentrations are typically associated with

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roadways or intersections operating at unacceptable levels of service or with very high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

Carbon monoxide (CO) "hot spot" thresholds ensure that emissions of CO associated with traffic impacts from a project in combination with CO emissions from existing and forecast regional traffic do not exceed State or Federal standards for CO at any traffic intersection affected by the project. Project concentrations may be considered significant if a CO hot spot intersection analysis determines that project-generated CO concentrations cause a localized violation of the State CO 1-hour standard of 20 ppm, State CO 8-hour standard of 9 ppm, Federal CO 1-hour standard of 35 ppm, or Federal CO 8-hour standard of 9 ppm.

A CO hot spot is a localized concentration of CO that is above the State or Federal 1-hour or 8-hour CO ambient air standards. Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles. To provide a worst-case scenario, CO concentrations are estimated at project-impacted intersections where the concentrations would be the greatest.

This analysis follows guidelines recommended by the CO Protocol (University of California, Davis 1997) and the SCAQMD. According to the CO Protocol, intersections with Level of Service (LOS) E or F require detailed analysis. In addition, intersections that operate under LOS D conditions in areas that experience meteorological conditions favorable to CO accumulation require a detailed analysis. The LOS for intersections is determined in the project Traffic Impact Analysis (refer to Section 4.15 of this EIR, Traffic and Circulation). The SCAQMD recommends that a local CO hot spot analysis be conducted if the intersection meets one of the following criteria: (1) the intersection is at LOS D or worse and where the project increases the volume to capacity ratio by 2 percent, or (2) the project decreases LOS at an intersection from C to D. A decrease in LOS, i.e., from C to D, means that there is more traffic and more delay at the intersection.

For this project analysis, the intersections with the highest traffic volumes and the LOS E or F before mitigation were identified for 2022 using information from the table in the traffic study "Intersection LOS under 2022 Plus Phase 1 Conditions." The intersections with the greatest LOS before mitigation were also identified for 2035 using information from the table in the traffic study "Intersection LOS under 2035 Plus Build-out Conditions."

The CO concentrations were estimated using the CALINE4 model using 2012 emission factors. The emission factors are for "all" vehicle classes and are not adjusted for a project-specific fleet to provide a worst-case scenario. In addition, the emission factors do not take into account the project mitigation reductions from requiring that all diesel trucks are model year 2010 or newer.

Table 4.3.H shows estimated CO concentrations at year 2022 plus project traffic conditions. The estimated CO concentrations at year 2035 are shown in Table 4.3.I. As shown in the tables, the estimated 1-hour and 8-hour average CO concentrations from project-generated and cumulative traffic plus the background concentrations are below the State and Federal standards. No CO hot spots are anticipated because of traffic-generated emissions by the project in combination with other anticipated development in the area. Therefore, the mobile emissions of CO from the project are not anticipated to contribute substantially to an existing or projected air quality violation of CO. Therefore, according to this criterion, air pollutant emissions during operation would result in a less than significant impact. No mitigation is required.

Note: The following tables were edited because the revised Traffic Impact Analysis revised traffic volumes and LOS. CO hotspot analyses are dependent of traffic volumes through specific intersections; changes in a traffic analysis may result in changes to the intersections that require analysis in order to determine the location of greatest impact. That occurred in this analysis with changing transportation analysis requiring a modified CO hotspot analysis.

Table 4.3.H: Carbon Monoxide Concentrations at Intersections, 2022

Intersection	Peak Hour	CO Concentration (ppm)		Significant Impact?
		1 Hour	8 Hour	
Cactus Avenue at Graham Street	PM	5.2	3.4	No
Cactus Avenue at Elsworth Street	PM	4.9	3.2	No
Alessandro Blvd at Sycamore Canyon Road	PM	4.8	3.1	No
Alessandro Blvd at Chicago Avenue	AM	5.2	3.4	No
Alessandro Blvd at Chicago Avenue	PM	5.4	3.5	No

- ppm = parts per million
- A significant impact would occur if the estimated CO concentration is over the 1-hour State standard of 20 ppm or the 8-hour State/Federal standard of 9 ppm.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

Table 4.3.I: Carbon Monoxide Concentrations at Intersections, 2035

Intersection	Peak Hour	CO Concentration (ppm)		Significant Impact?
		1 Hour	8 Hour	
Alessandro Blvd at Mission Grove Pkwy	PM	5.1	3.3	No
Alessandro Blvd at Chicago Avenue	AM	5.3	3.5	No
Alessandro Blvd at Chicago Avenue	PM	5.4	3.5	No
Alessandro Blvd at Canyon Crest Drive	AM	5.4	3.5	No
Alessandro Blvd at Canyon Crest Drive	PM	5.6	3.7	No

- ppm = parts per million
- A significant impact would occur if the estimated CO concentration is over the 1-hour State standard of 20 ppm or the 8-hour State/Federal standard of 9 ppm.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

4.3.6 Significant Impacts

The following impacts were determined to be potentially significant. In each of the following issues, mitigation measures have been recommended to reduce the significance of the identified impacts.

4.3.6.1 Air Quality Plan Management Plan Consistency

Impact 4.3.6.1: *Implementation of the proposed project has the potential to conflict with implementation of the SCAQMD 2012 AQMP.*

Threshold	Would the proposed project conflict with or obstruct implementation of the applicable air quality plan?
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According to the 1993 SCAQMD Handbook, there are two key indicators of consistency with the Air Quality Management Plan (AQMP):

1. Indicator: Whether the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
2. Indicator: A project would conflict with the AQMP if it would exceed the assumptions in the AQMP in 2010 or increments based on the year of project buildout and phase. The Handbook indicates that key assumptions to use in this analysis are population number and location and a regional housing needs assessment. The parcel-based land use and growth assumptions and inputs used

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in the Regional Transportation Model run by the Southern California Association of Governments that generated the mobile inventory used by the SCAQMD for AQMP are not available and assumed not to include the proposed project; therefore, the SCAQMD's significance thresholds are used to determine if the project exceeds the assumptions in the AQMP.

Considering the recommended criteria in the SCAQMD's 1993 Handbook, this analysis utilizes the following criteria to address this potential impact:

- Project's contribution to air quality violations (SCAQMD's first indicator, 1 as listed above);
- Assumptions in AQMP (SCAQMD's second indicator, 2, as listed above); and
- Compliance with applicable emission control measures in the AQMPs.

Project's Contribution to Air Quality Violations and Assumptions in AQMP. According to the SCAQMD, the project is consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP (SCAQMD 1993, page 12-3). As shown in analyses in Impact 4.3.6.3, the project could violate an air quality standard and therefore could contribute substantially to an existing or projected air quality violation.

If a project's emissions exceed the SCAQMD regional thresholds for NO_x, VOC, PM₁₀, or PM_{2.5}, it follows that the emissions could cumulatively contribute to an exceedance of a pollutant for which the Basin is in nonattainment (ozone, PM₁₀, and PM_{2.5}) at a monitoring station in the Basin.

The thresholds are criteria for determining environmental significance and are discussed in the SCAQMD's 1993 Handbook for Air Quality Analysis and are updated in the SCAQMD's most recent thresholds published online in 2012.¹ An exceedance of a nonattainment pollutant at a monitoring station would not be consistent with the goals of the AQMP to achieve attainment of pollutants.

As discussed in the analyses below (Impact 4.3.6.2, Construction Emissions, and Impact 4.3.6.4, Long-Term Operational Emissions), the project would exceed the regional emission significance thresholds for VOC, NO_x, CO, PM₁₀, and/or PM_{2.5} prior to the application of mitigation. (Refer specifically to Table 4.3.J for construction emissions and Table 4.3.Y for operational emissions.) This means that project emissions of VOC and NO_x could combine with other sources and could result in an ozone, PM₁₀, or PM_{2.5} exceedance at a nearby monitoring station. The Basin in which the project is located is in nonattainment for these pollutants; therefore, according to this criterion, the project would not be consistent with the AQMP. The regional emissions assume a zero baseline for existing emissions on the project site and therefore assumes that the AQMP had no emissions for the project site. The regional significance thresholds can be interpreted to mean that if project emissions exceed the thresholds, then the project would also not be consistent with the assumptions in the AQMP. The project does not meet this criterion.

Note: The project comparison with the Moreno Highlands Specific Plan was removed because it is assumed that there would be a zero baseline for the existing emissions, instead of assuming that the existing conditions are emissions from the Moreno Highlands Specific Plan. Please see the paragraphs above for a discussion. Note that a comparison to the Moreno Highlands Specific Plan is still part of the No Project analysis of the EIR and can be found in the Alternatives Section 6.0.

¹ The most recent SCAQMD significance thresholds are located at the following website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>

Compliance with Emission Control Measures. The second indicator of whether the project could conflict with or obstruct implementation of the AQMP is by assessing the project's compliance with the control measures in the AQMPs and the State Implementation Plan (SIP).

2003 AQMP. The 2003 AQMP contains a number of land use and transportation control measures including the following: the SCAQMD's Stationary and Mobile Source Control Measures; State Control Measures proposed by the CARB; and SCAG Transportation Control Measures (TCMs). The CARB's strategy for reducing mobile source emissions includes the following approaches: new engine standards; reduction of emissions from in-use fleet; requiring clean fuels; supporting alternative fuels and reduction of petroleum dependency; working with the EPA to reduce emissions from Federal and State sources; and pursuit of long-term advanced technology measures (AQMP 2003, page 4-25). SCAG TCMs include those contained in the Regional Transportation Plans (RTPs), the most current version of which is the 2008 RTP, which has control measures to reduce emissions from on-road sources by incorporating strategies such as high occupancy vehicle interventions, transit, and information-based technology interventions (AQMP 2003, page 4-19). The project would comply with the control measures and regulation set by the CARB and SCAG.

2007 AQMP. The focus of the 2007 AQMP is to demonstrate attainment of the Federal PM_{2.5} ambient air quality standard by 2015 and the Federal 8-hour ozone standard by 2024, while making expeditious progress toward attainment of State standards. This is to be accomplished by building upon improvements from the previous plans and incorporating all feasible control measures while balancing costs and socioeconomic impacts. The 2007 AQMP indicates that PM_{2.5} is formed mainly by secondary reactions of precursor gases. Therefore, instead of reducing fugitive dust (a primary source), the strategy for reducing PM_{2.5} focuses on reducing precursor emissions of SO_x, directly emitted PM_{2.5}, NO_x, and VOC.

The 2007 AQMP control measures consist of four components: The first component is SCAQMD's Stationary and Mobile Source Control Measures. The Final 2007 AQMP includes 30 short-term and mid-term stationary and seven mobile source control measures for SCAQMD implementation. A complete listing of the measures is in the 2007 AQMP and includes measures such as VOC reductions from gasoline transfer and dispensing facilities, further NO_x reductions from space heaters, localized control program for PM emission hot spots, urban heat island, energy efficiency and conservation, etc. Some of the measures will become new rules and some will be amendments to existing rules. When the rules pass, the owner-operator will follow the applicable rules.

The second component is the CARB's Proposed State Strategy, which includes short- and mid-term control measures aimed at reducing emissions from sources that are primarily under State jurisdiction, including on-road and off-road mobile sources, and consumer products. These measures are required in order to achieve the remaining emission reductions necessary for PM_{2.5} attainment. The CARB's strategy includes measures such as improvements to California's Smog Check Program, expanded passenger vehicle retirement, cleaner in-use heavy-duty trucks, reductions from port-related sources, cleaner off-road equipment, evaporative and exhaust strategies, pesticide strategies, etc. When these measures are implemented by the CARB, the project would be required to follow them.

The third component is the SCAQMD Staff's Proposed Policy Options to Supplement CARB's Control Strategy. SCAQMD staff believes that a combination of regulatory actions and public funding is the most effective means of achieving emission reductions. As such, the 2007 Final AQMP proposes three policy options for the lead agency to consider in achieving additional reductions. The first option is to incorporate the SCAQMD-proposed additional control measures as a menu of selections further reducing emissions from sources primarily under State and Federal jurisdiction. The second option is to have the State fulfill its NO_x emission reduction obligations under the 2003 AQMP by 2010 for its short-term defined control measures plus additional reductions needed to meet the NO_x emission target between 2010 and 2014. The third option is based on the same rate of progress under Policy Option 1 (the first option discussed above), but it relies heavily on public funding assistance to

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achieve the needed NO_x reductions via accelerated fleet turnover to post-2010 on-road emission standards or the cleanest off-road engine standards in effect today (or after 2010). This third component, the CARB's Control Strategy does not directly apply to the project. However, Mitigation Measure 4.3.6.3B requires that all diesel trucks accessing the project during operation be model year 2010 or newer, which is consistent with the third option under CARB's Strategy.

The fourth component consists of Regional Transportation Strategy and Control Measures provided by SCAG. Transportation plans within the Basin are statutorily required to conform to air quality plans in the region, as established by the 1990 Federal Clean Air Act and reinforced by other Acts. The region must demonstrate that its transportation plans and programs conform to the mandate to meet the Federal ambient air quality standards in a timely manner. The SCAG RTP is developed every 4 years with a 20-year planning horizon to meet the long-term transportation planning requirements for emission reductions from on-road mobile sources within the Basin. The Regional Transportation Improvement Program (RTIP) requires that SCAG meet the short-term implementation requirements of the Transportation Conformity Rule. The first 2 years of the program are fiscally constrained and demonstrate timely implementation of a special category of transportation projects called Transportation Control Measures (TCMs). In general, TCMs are those projects that provide emission reductions from on-road mobile sources, based on changes in the patterns and modes by which the regional transportation system is used. Strategies are grouped into three categories: high occupancy vehicle strategy, transit and systems management, and information-based technology (traveling during a less congested time of day). SCAG approved the transportation measures in the RTP, which have been included in the region's air quality plans. The TCMs will be implemented by the appropriate agencies and will subsequently reduce emissions in the Basin.

2012 AQMP. The 2012 AQMP was adopted in December 2012. The purpose of the 2012 AQMP for the Basin is to set forth a comprehensive and integrated program that will lead the Basin into compliance with the federal 24-hour PM_{2.5} air quality standard, and to provide an update of the Basin's projections in meeting the Federal 8-hour ozone standards. The 2012 AQMP states, "The remarkable historical improvement in air quality since the 1970's is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs."

Similar to the prior AQMPs, the project would comply with all applicable rules and regulations enacted as part of the AQMP. In addition, the AQMP relies upon the SCAG regional transportation strategy, which is in its adopted 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2011 Federal Transportation Improvement Program. Included in the RTP/SCS are transportation control measures including active transportation (non-motorized transportation, e.g., biking and walking); transportation demand management; transportation system management; transit; passenger and high-speed rail; goods movement; aviation and airport ground access; highways; arterials; and operations and maintenance.

The project would be involved in goods movement. The heavy-duty trucks would access local highways and arterials.

State Implementation Plans. Geographical areas in the State that exceed the Federal air quality standards are called nonattainment areas. The project area is in nonattainment for ozone, PM₁₀, and PM_{2.5}. SIPs show how each area will attain the Federal standards. To do this, the SIPs identify the amount of pollutant emissions that must be reduced in each area to meet the standard and the emission controls needed to reduce the necessary emissions. On September 27, 2007, the CARB adopted its State Strategy for the 2007 SIP. In 2009, the SIP was revised to account for emissions reductions from regulations adopted in 2007 and 2008 and clarifies CARB's legal commitment. Additional recent revisions to the SIP are as follows:

- In 2008, the EPA revised the lead¹ national ambient air quality standard by reducing it to 0.15 µg/m³. On December 31, 2010, the Los Angeles County portion of the Basin was designated as nonattainment for the 2008 lead national standard as a result of exceedances measured near a large lead-acid battery recycling facility. The 2012 Lead SIP for Los Angeles County was prepared by the SCAQMD and addresses the recent revision to the lead national standard, and outlines the strategy and pollution control activities that demonstrate attainment of the lead national standard before December 31, 2015. The 2012 Lead SIP was approved May 4, 2012.
- A SIP revision for the federal nitrogen dioxide standard was prepared in 2012, to address the new 1-hour federal ambient air quality standard for nitrogen dioxide.
- The proposed California Infrastructure SIP revision was considered by the CARB on January 23, 2014. The proposed Infrastructure SIP revision is administrative in nature and covers the National Ambient Air Quality Standards (federal standards) for ozone (1997 and 2008), fine particulate matter (PM_{2.5}; 1997, 2006, and 2012), lead (2008), nitrogen dioxide (2010), and sulfur dioxide (2010). The proposed revision describes the infrastructure (authorities, resources, and programs) California has in place to implement, maintain, and enforce these federal standards. It does not contain any proposals for emission control measures.

The SIP takes into account CARB rules and regulations. The project will comply with applicable rules and regulations as identified in the AQMPs and SIPs. Because the project would comply with all applicable rules and regulations, the project complies with this criterion.

Summary. Although the project would be consistent with the policies, rules, and regulations in the AQMPs and SIPs, the project must meet all the criteria listed above to be consistent with the AQMPs. The project could impede AQMP attainment because its construction and operation emissions exceed the SCAQMD regional significance thresholds, so the project is considered to be inconsistent with the AQMP.

Mitigation Measures. To facilitate monitoring and compliance, applicable SCAQMD regulatory requirements are restated in the mitigation identified below in Section 4.3.6.2 and 4.3.6.3. These measures shall be incorporated in all project plans, specifications, and contract documents. Typical mitigation measures identified to reduce the level of emissions of criteria pollutants include those identified below in Section 4.3.6.2 and 4.3.6.3. **Mitigation Measures 4.3.6.2A, 4.3.6.2B, 4.3.6.2C, 4.3.6.2D, 4.3.6.3A, 4.3.6.3B, 4.3.6.3C, 4.3.6.3D, and 4.3.6.4A** are required.

Level of Significance After Mitigation. As noted above, implementation of the proposed project would exceed applicable thresholds for all criteria pollutants, with the exception of SO_x. Despite the implementation of mitigation measures, emissions associated with the proposed project cannot be reduced below the applicable thresholds. In the absence of feasible mitigation to reduce the proposed project's emission of criteria pollutants to below SCAQMD thresholds, potential air quality impacts resulting from exhaust from construction equipment will remain significant and unavoidable.

4.3.6.2 Construction Emissions

Impact 4.3.6.2: *Construction of the proposed project has the potential to exceed applicable daily thresholds that may affect sensitive receptors.*

Threshold	Would the proposed project violate any AAQS or contribute to an existing or projected air quality violation; or expose sensitive receptors to pollutants? For construction operations, the applicable daily thresholds are:
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¹ Lead referred to here is a chemical element; a heavy metal.

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- 75 pounds per day of ROC/VOC;
- 100 pounds per day of NO_x;
- 550 pounds per day of CO;
- 150 pounds per day of PM₁₀;
- 150 pounds per day of SO_x; and
- 55 pounds per day of PM_{2.5}.

Grading and other construction activities produce combustion emissions from various sources such as site grading, utility engines, on-site heavy-duty construction vehicles, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew. Exhaust emissions during these construction activities will vary daily as construction activity levels change. The use of construction equipment on site would result in localized exhaust emissions. Activity during peak grading days typically generates a greater amount of air pollutants than other project construction activities.

While the actual details of the future construction schedule are not known, it is expected that project construction would occur in two phases with seven discrete activities in Phase 1 and eight discrete activities in Phase 2. For Phase 1, the following activities are assumed to occur over the course of seven years in the analysis: 1) rough grading, which includes mass site grading; 2) finish grading; 3) building construction; 4) infrastructure construction which includes utility installation; 5) curb, gutter, sidewalk, subgrade preparation, drop rock, and paving activities; 6) asphalt paving; and 7) landscaping. For Phase 2, the same activities are assumed to occur over the course of nine years in the analysis, Phase 1 includes interchange construction as the eighth activity. Within the “building construction” phase, it is assumed that there would also be subphases of concrete pouring, installation of wet utilities, electrical installation, and landscaping. Appendix D of this EIR includes details of the emission factors and other assumptions.

Table 4.3.J identifies projected emissions resulting from grading and construction activities for the proposed project and shows the estimated maximum daily construction emissions over the course of project construction prior to the application of mitigation.

The construction emissions estimates summarized in Table 4.3.J are based on the assumed construction scenario described in Section 3.0, *Project Description*, of this EIR. Using emission factors from the CalEEMod model, Table 4.3.J indicates that construction emissions of criteria pollutants would exceed the SCAQMD daily emission thresholds for all criteria pollutants (VOC, NO_x, CO, PM₁₀, and PM_{2.5}), with the exception of SO_x.¹ This is a significant impact requiring mitigation.

Fugitive dust emissions are generally associated with land clearing and exposure of soils to the air and wind, and cut-and-fill grading operations. Dust generated during construction varies substantially by project, depending on the level of activity, the specific operations and equipment, local soils, and weather conditions at the time of construction. The proposed project will be required to comply with SCAQMD Rules 402 and 403 to control fugitive dust. There are a number of feasible control measures that can be reasonably implemented to significantly reduce PM₁₀ emissions from construction.

As identified in Table 4.3.J, fugitive dust and exhaust emissions during the anticipated peak construction day for the proposed project would exceed SCAQMD daily construction thresholds. The percentage of dust and exhaust varies by year but for PM₁₀ is an average of 70 percent dust and 30 percent exhaust. PM_{2.5} has an average of 29 percent dust and 71 percent exhaust.

¹ The project would emit SO_x from construction equipment exhaust; however, the maximum emissions (6.8 pounds per day) are less than significant as they are far below the threshold of 150 pounds per day.

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Table 4.3.J: Short-Term Regional Construction Emissions–Without Mitigation (Table Revised)

Year	Maximum Daily Pollutant Emissions (lbs/day)								
	VOC	NO _x	CO	PM ₁₀ dust	PM ₁₀ exhaust	PM ₁₀ Total	PM _{2.5} dust	PM _{2.5} exhaust	PM _{2.5}
2015	128	1,463	871	124	69	193	20	64	84
2016	267	841	530	82	44	126	9	41	50
2017	314	1,432	849	125	68	193	20	62	82
2018	267	841	530	82	44	126	9	41	50
2019	371	2,116	1,226	173	93	266	38	86	124
2020	277	961	596	86	50	137	11	46	57
2021	303	1,259	774	122	62	184	19	57	76
2022	286	1,057	668	116	53	169	17	49	66
2023	317	1,389	885	141	66	207	26	61	87
2024	298	1,174	754	125	57	183	20	53	73
2025	311	1,289	854	141	62	203	26	57	83
2026	267	841	530	82	44	126	9	41	50
2027	263	729	750	140	28	168	26	26	52
2028	252	607	667	126	23	149	20	21	41
2029	223	318	456	82	12	94	9	11	20
2030	245	420	571	124	16	140	20	15	35
SCAQMD Threshold	75	100	550	NA	NA	150	NA	NA	55
Exceeds Threshold?	Yes	Yes	Yes	NA	NA	Yes	NA	NA	Yes

- Sulfur oxide (SO_x) emissions are contained in the CalEEMod output; the maximum emissions would be 2.5 pounds per day, substantially under the threshold of 150 pounds per day.
 - The emissions assume all construction activities (mass grading, fine grading, building, utilities, curbing, landscaping, painting, paving, and/or interchange) occur on the same day, depending on the year in which the activity occurs.
 - Emissions assume compliance with SCAQMD Rule 403.
 VOC = volatile organic compounds NO_x = nitrogen oxides CO = carbon monoxide PM₁₀ and PM_{2.5} = particulate matter
 NA = not applicable as there is no separate threshold for dust/exhaust
 Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

The proposed project is required to comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 402 requires implementation of dust-suppression techniques to prevent fugitive dust from creating a nuisance off site. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rule 403 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM₁₀ component). Compliance with these rules would reduce impacts on nearby sensitive receptors. The applicable Rule 403 measures are as follows:

- All clearing, grading, earthmoving, or excavation activities shall cease when winds exceed 25 miles per hour per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered at least three times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.

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- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meter (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicular Code Section 23114.
- The contractor shall ensure that traffic speeds on unpaved roads and project site areas are 15 miles per hour or less to reduce fugitive dust haul road emissions.

As previously discussed, SCAQMD Rule 1113 regulates the sale and application of architectural coatings. Rule 1113 is applicable to any person who applies or solicits the application of any architectural coating within the Basin. Rule 1113 sets limits on the amount of ROG or VOC emissions allowed for all types of architectural coatings. Compliance with Rule 1113 means that architectural coatings used during construction would have ROG or VOC emissions that comply with these limits.

Mitigation Measures. The following measures are recommended to reduce the level of emissions of criteria pollutants:

- 4.3.6.2A** Construction equipment maintenance records (including the emission control tier of the equipment) shall be kept on site during construction and shall be available for inspection by the City of Moreno Valley.
- a) Off-road diesel-powered construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency Tier 4 off-road emissions standards. A copy of each unit's certified tier specification shall be available for inspection by the City at the time of mobilization of each applicable unit of equipment.
 - b) During all construction activities, off-road diesel-powered equipment may be in the "on" position not more than 10 hours per day. c) Construction equipment shall be properly maintained according to manufacturer specifications.
 - d) All diesel powered construction equipment, delivery vehicles, and delivery trucks shall be turned off when not in use. On-site idling shall be limited to three minutes in any one hour.
 - e) Electrical hook ups to the power grid shall be provided for electric construction tools including saws, drills and compressors, where feasible, to reduce the need for diesel-powered electric generators. Where feasible and available, electric tools shall be used
 - f) The project shall demonstrate compliance with South Coast Air Quality Management District Rule 403 concerning fugitive dust and provide appropriate documentation to the City of Moreno Valley.
 - g) All construction contractors shall be provided information on the South Coast Air Quality Management District Surplus Off-road Opt-In "SOON" funds which provides funds to accelerate cleanup of off-road diesel vehicles.
 - h) Construction on-road haul trucks shall be model year 2007 or newer.
 - i) Information on ridesharing programs shall be made available to construction employees.
 - j) During construction, lunch options shall be provided onsite.
 - k) A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints per AQMD Standards. l) Only non-diesel material handling equipment may be used in any logistics building in the WLC.

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m) Off-site construction shall be limited to the hours between 6 a.m. to 8 p.m. on weekdays only. Construction during City holidays shall not be permitted.

4.3.6.2B Prior to issuance of any grading permits, a traffic control plan shall be submitted to and approved by the City of Moreno Valley that describes in detail the location of equipment staging areas, stockpiling/storage areas, construction parking areas, safe detours around the project construction site, as well as provide temporary traffic control (e.g., flag person) during construction-related truck hauling activities. Construction trucks shall be rerouted away from sensitive receptor areas. Trucks shall use State Route 60 using Theodore Street, Redlands Boulevard (north of Eucalyptus Avenue), and Gilman Springs Road. In addition to its traffic safety purpose, the traffic control plan can minimize traffic congestion and delays that increase idling emissions. A copy of the approved Traffic Control Plan shall be retained on site in the construction trailer.

4.3.6.2C The following measures shall be applied during construction of the project to reduce volatile organic compounds (VOC):

- a) Non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the project to the maximum extent practicable. If such products are not commercially available, products with a VOC content of 100 grams per Liter or lower for both interior and exterior surfaces shall be used.
- b) Leftover paint shall be taken to a designated hazardous waste center.
- c) Paint containers shall be closed when not in use
- d) Low VOC cleaning solvents shall be used to clean paint application equipment.
- e) Paint and solvent-laden rags shall be kept in sealed containers.

4.3.6.2D No grading shall occur on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 24).

As shown in Table 4.3.K, construction emissions are still significant after mitigation, with the exception of PM_{2.5}. The reduction in PM_{2.5} emissions is by a reduction in exhaust from the application of Tier 4 off-road equipment. PM₁₀ emissions are still significant because emissions in 2019 exceed the threshold; however, emissions of PM₁₀ during all other years of construction are less than significant. Although mitigation reduces emissions of all pollutants during construction, potential air quality impacts resulting from exhaust from construction equipment and fugitive dust will remain significant and unavoidable.

Table 4.3.K: Mitigated Short-Term Regional Construction Emissions (revised)

Year	Maximum Daily Pollutant Emissions (lbs/day)				
	VOC	NO _x	CO*	PM ₁₀	PM _{2.5}
2015	31	523	871	130	26
2016	134	371	530	86	14
2017	143	529	849	130	26
2018	134	371	530	86	14
2019	158	764	1226	181	45
2020	135	401	596	91	16
2021	142	515	774	128	25
2022	140	460	668	122	22

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Table 4.3.K: Mitigated Short-Term Regional Construction Emissions (revised)

Year	Maximum Daily Pollutant Emissions (lbs/day)				
	VOC	NO _x	CO*	PM ₁₀	PM _{2.5}
2023	148	605	885	147	32
2024	143	522	754	131	26
2025	148	605	854	148	32
2026	134	371	530	86	14
2027	145	571	750	146	31
2028	142	519	667	131	25
2029	132	368	456	86	13
2030	139	470	571	129	25
Average Emissions from revised analysis (for informational purposes)	134	498	719	122	24
Average Emissions from Draft EIR (for informational purposes)	233	1,100	1217	87	49
SCAQMD Threshold	75	100	550	150	55
Exceeds Threshold?	Yes	Yes	Yes	Yes	No

- * There is an error in the way CalEEMod estimates the effect of a higher tier (such as Tier 3 or 4) on mitigated CO; therefore, the unmitigated values are reported for CO. This was confirmed by the SCAQMD by a personal communication. The SCAQMD is currently preparing a work around for this; however, it was not available as of the date of this analysis.
- Sulfur oxide (SO_x) emissions are contained in the CalEEMod output in Appendix A of the Air Quality, Greenhouse Gas, and Health Risk Assessment Report; the maximum emissions would be approximately 2 pounds per day after mitigation, substantially under the threshold of 150 pounds/day.
 - Mitigation Measure 4.3.6.2A(a) was estimated by CalEEMod using its mitigation module by assuming Tier 4 off-road equipment.
 - Mitigation Measure 4.3.6.2A(b) restricts equipment from operating more than 10 hours per day in the on position, which is estimated in CalEEMod in both the unmitigated and mitigated estimates.
 - Mitigation Measures 4.3.6.2A(c) through (e), 4.3.6.2A(g) through (m), 4.3.6.2B, and 4.3.6.2D are not quantified.
 - Mitigation Measure 4.3.6.2A(f) is assumed in the unmitigated and mitigated estimates (Rule 403).
 - Mitigation Measure 4.3.6.2A(i) requires that construction haul trucks be 2007 model year or greater. CalEEMod does not have a mitigation measure embedded in the model to quantify the reduction from this measure. Therefore, this reduction quantification was not provided.
 - Mitigation Measure 4.3.6.2C reduces VOC emissions during painting and is calculated as demonstrated in the spreadsheets in Appendix A of the Air Quality, Greenhouse Gas, and Health Risk Assessment Report.
- VOC = volatile organic compounds NO_x = nitrogen oxides CO = carbon monoxide PM₁₀ and PM_{2.5} = particulate matter
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

Comparing the emissions to those as estimated in the DEIR, average daily emissions of VOC, NO_x, CO and PM_{2.5} have decreased by approximately 100, 600, 500 and 25 pounds per day, respectively. This is primarily because 1) the construction period for the project increased from 10 years to 15 years, resulting in decreased construction activity levels (if market conditions further slow project development, impacts would be no greater than those described in this analysis); 2) Tier 4 equipment is applied as mitigation; and 3) a newer version of CalEEMod was used to estimate construction emissions. The average PM₁₀ emissions increased slightly by approximately 35 pounds per day, primarily because of the inclusion of unpaved road dust.

The results of this regional construction analysis indicate that during construction, the South Coast Air Basin may experience the following cumulative health effects from ozone exposure:¹

¹ Although carbon monoxide emissions are over the threshold, it is primarily a localized pollutant. The localized analyses demonstrated that concentrations would not exceed the ambient air quality standards for carbon monoxide; therefore, less than significant health effects are anticipated.

Ozone can cause the following health effects: Irritate respiratory system; reduce lung function; breathing pattern changes; reduction of breathing capacity; inflame and damage cells that line the lungs; make lungs more susceptible to infection; aggravate asthma; aggravate other chronic lung diseases; cause permanent lung damage; some immunological changes; and/or increased mortality risk.

4.3.6.3 Localized Construction and Operational Air Quality Impacts

Impact 4.3.6.3: *Construction and operation of the proposed project has the potential to exceed localized daily thresholds that may affect sensitive receptors.*

Threshold	Would the proposed project violate any AAQS or contribute to an existing or projected air quality violation; or expose sensitive receptors to pollutants? The applicable localized thresholds are: - 20 ppm (1 hour) and 9 ppm (8 hours) of CO during construction or operation; - 0.18 ppm (State 1 hour), 0.100 ppm (National 1 hour), and 0.030 ppm (Annual) of NO _x during construction or operation; - 10.4 µg/m ³ (24 hours) 1.0 µg/m ³ (Annual) of PM ₁₀ during construction - 2.5 µg/m ³ (24 hours) and 1.0 µg/m ³ (Annual) of PM ₁₀ ; during operation and - 2.5 µg/m ³ (24 hours) of PM _{2.5} during operation - During time periods when construction and operational activities occur at the same time, the SCAQMD recommends application of the significance thresholds for operations to assess the significance of the activities
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Note: Section 4.3.6.3 in the original DEIR was replaced in its entirety in this revised DEIR section. The reader is referred to the original DEIR section 4.3.6.3 for the text of that section.

The localized analysis focused on three analysis conditions:

1. Project Phase 1 (2012), which evaluates what air quality impacts the project-related emissions would have if Phase 1 of the project (approximately 56 percent of the square footage) was built out in full in 2012¹ and no other changes occurred to land uses or the roadway system;
2. Project Phase 1 and Phase 2 Full Build Out (2012), which evaluates what air quality impacts the project-related emissions would have if the entire project, both Phase 1 and Phase 2, were build out in full in 2012 and no other changes occurred to land uses or the roadway system; and
3. Proposed Project Development Schedule, which evaluates the air quality impacts from the construction and operation of the project as a 2-phase development with the construction commencing in 2015, build out of Phase 1 in 2022 and the final Phase 1 and Phase 2 build out in 2035.

The Project Phase 1 (2012) and Project Phase 1 and Phase 2 Full Build Out (2012) conditions represents worst-case conditions in that the project physically could not be built-out in 2012 or, in fact, in any single year due to the size of the project. These conditions have been included in this assessment to correspond to the analysis scenarios examined in the project traffic impact report. These conditions also do not account for the fact that vehicle emissions are expected to decline significantly over the next ten years in response to mandated motor vehicle emission controls adopted by the CARB and EPA as

¹ 2012 is the CEQA Baseline year for this project.

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the project develops in the future. Thus, consideration of these conditions will significantly overestimate the project’s potential air quality impacts. The Proposed Project Development condition represents the logical and realistic development of the project over a period of 15 years as represented by the project applicant. The LST analysis is presented for each condition below.

Pursuant to the SCAQMD’s LST methodology, only emissions generated from emission sources located within and along the project boundaries are included in the LST assessment. These emission sources include vehicle travel on the roadway network within and along the borders of the project and emissions from support equipment including forklifts, yard/hostler trucks, and emergency standby electric generators.

The project’s emissions then served as input into the AERMOD air dispersion model to derive estimate of the project’s localized air quality impacts for each condition.

Project Phase 1 (2012) LST Assessment

The project’s on-site emissions were estimated from the traffic-generated by the various project vehicles as provided by the traffic impact report. Vehicle emissions were assumed to be representative of the calendar year 2012 vehicle fleet. Also included were emissions from various support equipment including forklifts, yard trucks, and standby emergency generators. The localized assessment results for the Project Phase 1 (2012) condition are provided in Table 4.3.L for receptors located within the project boundaries and in Table 4.3.M for receptors located outside the project’s boundaries along with a comparison to the SCAQMD’s localized significance thresholds. The significance thresholds for CO and nitrogen dioxide are derived from the measured ambient air quality data from the SCAQMD Riverside air monitoring station and serve as the measure of existing air quality.¹

Table 4.3.L: Localized Assessment of Project Phase 1 (2012) Emissions Maximum Impacts Within the Project Boundaries (without mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.14	2.78	20	No
	8 hour, ppm	1.84	0.04	1.88	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.068	0.146	0.18	No
	National 1 hour, ppm	0.060	0.012	0.113	0.100	Yes
	Annual, ppm	0.017	0.012	0.029	0.030	Yes
PM ₁₀	24 hour, µg/m ³	NA	5.4	5.4	2.5	Yes
	Annual, µg/m ³	NA	3.4	3.4	1.0	Yes
PM _{2.5}	24 hour, µg/m ³	NA	2.2	2.2	2.5	No

¹ In keeping with the SCAQMD recommendations, the highest air quality measurement for the years 2009, 2010, 2011, and 2012 served as a measure of the existing background air quality data for NO₂ and CO.

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Table 4.3.L: Localized Assessment of Project Phase 1 (2012) Emissions Maximum Impacts Within the Project Boundaries (without mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold
			Project Local Impact	Total (Background + Project)		

µg/m³ = micrograms per cubic meter (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

² Highest impacts generally occur at the existing residences within the project boundaries.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

Table 4.3.M: Localized Assessment of Project Phase 1 (2012) Emissions Maximum Impacts Outside of the Project Boundaries (without mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.07	2.71	20	No
	8 hour, ppm	1.84	0.02	1.86	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.038	0.116	0.18	No
	National 1 hour, ppm	0.058	0.031	0.089	0.100	No
	Annual, ppm	0.017	0.004	0.021	0.030	No
PM ₁₀	24 hour, µg/m ³	NA	2.1	2.1	2.5	No
	Annual, µg/m ³	NA	1.1	1.1	1.0	Yes
PM _{2.5}	24 hour, µg/m ³	NA	0.8	0.8	2.5	No

µg/m³ = micrograms per cubic meter (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

² Highest impacts generally occur at the existing residences along Redlands Boulevard to the west of the project.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

As noted from Table 4.3.L, the project would exceed the SCAQMD's localized significance thresholds for nitrogen dioxide and PM₁₀ at receptors located within the project boundaries, realizing again however, that this scenario reflects an impossible situation that assumes that Phase 1 of the project is built out in its entirety in 2012 and that the existing receptors located within the project boundaries remain in place. As shown in Table 4.3.M, the significance thresholds would not be exceeded at any sensitive receptor located outside of the project boundaries except for the annual PM₁₀ project impact.

The Project Phase 1 and Phase 2 Full Build Out (2012) LST Assessment

The localized assessment results for the Project Phase 1 and Phase 2 Full Build Out (2012) condition are provided in Table 4.3.N for receptors located within the project boundaries and in Table 4.3.O for receptors located outside the project's boundaries along with a comparison to the SCAQMD's localized significance thresholds. The significance thresholds for CO and nitrogen dioxide are derived

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from the measured ambient air quality data from the SCAQMD Riverside air monitoring station and serve as the measure of existing air quality.

**Table 4.3.N: Localized Assessment of Project Phase 1 and Phase 2 Full Build Out (2012)
Emissions Maximum Impacts Within the Project Boundaries (without mitigation) (revised)**

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.18	2.82	20	No
	8 hour, ppm	1.84	0.05	1.89	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.093	0.171	0.18	No
	National 1 hour, ppm	0.058	0.075	0.133	0.100	Yes
	Annual, ppm	0.017	1.012	0.029	0.030	No
PM ₁₀	24 hour, µg/m ³	NA	7.2	7.2	2.5	Yes
	Annual, µg/m ³	NA	4.8	4.8	1.0	Yes
PM _{2.5}	24 hour, µg/m ³	NA	2.9	2.9	2.5	Yes

µg/m³ = micrograms per cubic meter (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

² Highest impacts generally occur at the existing residences within the project boundaries.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

**Table 4.3.O: Localized Assessment of Project Phase 1 and Phase 2 Full Build Out (2012)
Emissions Maximum Impacts Outside the Project Boundaries (without mitigation) (revised)**

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.09	2.73	20	No
	8 hour, ppm	1.84	0.02	1.86	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.054	0.132	0.18	No
	National 1 hour, ppm	0.058	0.045	0.103	0.100	Yes
	Annual, ppm	0.017	0.004	0.021	0.030	No
PM ₁₀	24 hour, µg/m ³	NA	2.3	2.3	2.5	No
	Annual, µg/m ³	NA	1.2	1.2	1.0	Yes
PM _{2.5}	24 hour, µg/m ³	NA	0.9	0.9	2.5	No

µg/m³ = micrograms per cubic meter (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

² Highest impacts generally occur at the existing residences along Redlands Boulevard to the west of the project.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

As noted from the above tables, the project would exceed the SCAQMD's significance thresholds for NO₂, PM₁₀, and PM_{2.5} for receptors located within the project's boundaries and NO₂ and PM₁₀ at receptors located outside of the project's boundaries.

It is important to note the Project Phase 1 (2012) and Project Phase 1 and Phase 2 Full Build Out (2012) conditions assume that the project's emissions are at the levels that would occur in 2012. The majority of the project's operational emissions are from on-road mobile sources, more particularly, heavy-duty trucks that contribute a disproportionate amount of emissions compared to passenger vehicles. Emissions from on-road mobile sources are regulated at the State and Federal levels and, therefore, are outside of the control of local agencies such as the City and the SCAQMD. For example, the CARB is working closely with the EPA, engine and vehicle manufacturers, and other interested parties to identify programs that will reduce emissions from heavy-duty diesel vehicles in California. In its "Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-fueled Engines and Vehicles," the CARB presented a blueprint for achieving a 75 percent reduction in diesel particulates by 2010 and an 85 percent reduction by 2020 from the 2000 baseline. The emission reductions would arise from a combination of measures including the use of ultra-low sulfur diesel fuel, new emission standards for large diesel engines, restrictions on diesel engine idling, addition of post-combustion filter and catalyst equipment, and retrofits for business and government diesel truck fleets. The implementation of these emission reductions will also result in reductions of other pollutants such as NO_x, VOC, and CO. As these emission reduction programs are implemented and there is a turnover in the use of older vehicles with newer and cleaner vehicles, the project's operational emissions are expected to decline significantly in the future.

Emission controls on mobile source vehicles already adopted by the CARB particularly dealing with NO_x and PM₁₀ controls on heavy duty trucks will reduce truck emissions significantly over the next 10 years. As an example, in the South Coast Air Basin, the per-mile running exhaust rate of NO_x emissions from the largest category of heavy duty diesel trucks is estimated to decline from an average of 11.4 grams/mile in 2012 to 3.9 grams/mile by 2022, a decline of 66 percent from 2012 levels and to 1.8 grams/mile in 2035, a decrease of 84 percent from 2012 levels. Similarly, the per-mile running exhaust rate of PM₁₀ emissions from the largest category of heavy duty diesel trucks is estimated to decline from an average of 0.34 gram/mile in 2012 to 0.02 gram/mile in 2022, a decline of 94 percent from 2012 levels and decline to 0.006 grams/mile in 2035, a decline of 98 percent from 2012 levels. Thus, two Project (2012) conditions represent highly conservative estimates, in terms of overestimating of the project's operational impacts.

Proposed Project Development Schedule LST Assessment

The final localized threshold assessment condition examined potential local project impacts considering the proposed construction and build out schedule of the project over a time period of 15 years from the commencement of construction in 2015 to the final build out in 2035. This condition examined three specific time periods:

- The year 2021: the year 2021 was selected to determine the potential localized impacts from the project's construction and operational emissions to the existing residences located to the west of the project across Redlands Boulevard. These residences are the closest sensitive receptors outside of the project's boundaries. According to the conceptual construction schedule provided by the applicant, extensive building construction is expected to take place within the project site along and to the east of Redlands Boulevard in 2021. The year 2021 also corresponds to the completion of approximated 88 percent of the Phase 1 operation (50 percent of the entire project) and the attendant operational emissions. The project's onsite maximum daily and annual construction emissions were estimated using the CalEEMod land use emission model and the construction equipment inventory and activities provided by the applicant (see discussion in Appendix D). The project's onsite operational emissions, principally from the project's mobile sources, were derived from detailed traffic volume data provided by the project's traffic impact

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analysis. The traffic impact analysis applied a comprehensive regional transportation model to develop daily and peak hour traffic volumes for 2022 and 2035 from the project’s mobile sources. Peak hour and daily project traffic volumes were developed for each year from 2015 to 2035 for roadway segments within and along the boundaries of the project using the following assumptions:

- Project operational traffic volumes were assumed to be zero in 2015, the year that project construction would commence.
- Traffic volumes for the years 2016 to 2022 (the completion year for Phase 1 operations) were interpolated from 2015 to 2022 by applying the annual project occupancy schedule to the 2022 traffic volumes.
- Traffic volumes for the years 2023 to 2035 were interpolated from the provided traffic volumes in 2022 and 2035 by applying the annual project occupancy schedule.
- The year 2027, when the project’s total daily on-site construction and operational emissions would be the highest for several air pollutants and construction and operations would occur along the eastern portion of the project potentially impacting the existing residences across from the project along Gilman Springs Road; and
- The year 2035, which is the long term planning year analyzed in the project traffic impact report and representative of the complete build out of both Phases 1 and 2.

Localized Impact Analysis, 2021. The localized impacts for the short-term construction and operational activities were analyzed using an air dispersion model (EPA AERMOD Model) to simulate the transport and dispersion of project-related emissions through the air. These impacts were then compared to the applicable SCAQMD localized concentration thresholds.

The estimated maximum localized air quality impacts from the construction and operation of the project in 2021 are summarized in Table 4.3.P for locations within the project’s boundaries. These maximum impacts were found at the locations of the existing residences within the project boundaries. Table 4.3.Q summarizes the highest air quality impacts for sensitive receptors located outside of the project boundaries. As noted from these two tables, project impacts would exceed the significance thresholds for nitrogen dioxide, PM₁₀ and PM_{2.5} for locations within the project boundaries and nitrogen dioxide and PM₁₀ at receptors located outside the project boundaries, and thus represents a significant impact without mitigation.

Table 4.3.P: Localized Assessment – Construction and Operation, Year 2021 Maximum Impacts Within the Project Boundaries (without Mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold?
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.34	2.98	20	No
	8 hour, ppm	1.84	0.08	1.93	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.086	0.164	0.18	No
	Annual, ppm	0.017	0.016	0.033	0.030	Yes
PM ₁₀	24 hour, µg/m ³	NA	18.9	8.9	2.5 ³	Yes
	Annual, µg/m ³	NA	2.7	2.7	1.0	Yes
PM _{2.5}	24 hour, µg/m ³	NA	3.7	3.7	2.5 ³	Yes

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Table 4.3.P: Localized Assessment – Construction and Operation, Year 2021 Maximum Impacts Within the Project Boundaries (without Mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold?
			Project Local Impact	Total (Background + Project)		

µg/m³ = micrograms per cubic meter (a concentration unit), ppm = parts per million (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

² Highest impacts generally occur at the existing residences within the project boundaries

³ During periods when both construction and operation overlap the SCAQMD recommends the operational significance thresholds for PM₁₀ and PM_{2.5} as opposed to the construction thresholds which are 10.4 µg/m³ for PM₁₀ and PM_{2.5}. This provides a very conservative threshold for determining the significance of project impacts.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

Table 4.3.Q: Localized Assessment – Construction and Operation, Year 2021 Maximum Impacts Outside the Project Boundaries (without Mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold?
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.32	2.96	20	No
	8 hour, ppm	1.84	0.08	1.93	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.083	0.161	0.18	No
	Annual, ppm	0.017	0.015	0.032	0.030	Yes
PM ₁₀	24 hour, µg/m ³	NA	3.5	3.5	2.5 ³	Yes
	Annual, µg/m ³	NA	0.9	0.9	1.0	No
PM _{2.5}	24 hour, µg/m ³	NA	2.4	2.4	2.5 ³	No

µg/m³ = micrograms per cubic meter (a concentration unit), ppm = parts per million (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012.

² Highest impacts at any receptor located outside of the boundaries of the project generally occur in the residential areas to the west of the project across Redlands Boulevard.

³ During periods when both construction and operation overlap the SCAQMD recommends the operational significance thresholds for PM₁₀ and PM_{2.5} as opposed to the construction thresholds which are 10.4 µg/m³ for PM₁₀ and PM_{2.5}. This provides a very conservative threshold for determining the significance of project impacts.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

Localized Air Quality Impact Analysis, 2027. The year 2027 was selected for the LST Analysis for two principal reasons: 1) the year 2027 corresponds to the year with the highest combined total onsite construction and operational emissions of NO_x and CO and the third or fourth highest onsite emissions of PM₁₀ and PM_{2.5} during the time period of 2015 to 2035; and 2) the location of the building construction in 2027 places the construction emissions adjacent to the existing residences located on the eastern side of the project across Gilman Springs Road.

The project's maximum combined impacts from construction and operations during 2027 are shown in Table 4.3.R for the existing sensitive receptors located within the project boundaries along with the SCAQMD-recommended significance thresholds. Table 4.3.S shows the maximum combined impacts for sensitive receptors located outside of the project boundaries. These latter impacts were found within the residential areas located to the east of the project across Gilman Springs Road. As shown

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in these tables, the project would exceed the SCAQMD’s significance thresholds for PM₁₀ at locations within the project boundary and no thresholds outside of the project boundary.

Table 4.3.R: Localized Assessment – Construction and Operation, Year 2027 Maximum Impacts Within the Project Boundaries (without Mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold?
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.21	2.85	20	No
	8 hour, ppm	1.84	0.05	1.89	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.072	0.150	0.18	No
	Annual, ppm	0.017	0.008	0.025	0.030	No
PM ₁₀	24 hour, µg/m ³	NA	5.5	5.57	2.5 ³	Yes
	Annual, µg/m ³	NA	3.3	3.3	1.0	Yes
PM _{2.5}	24 hour, µg/m ³	NA	1.6	1.6	2.5 ³	No

µg/m³ = micrograms per cubic meter (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

² Highest impacts at any receptor located outside of the boundaries of the project generally occur in the residential areas to the east of the project across Gilman Springs Road

³ During periods when both construction and operation overlap the SCAQMD recommends the operational significance thresholds for PM₁₀ and PM_{2.5} as opposed to the construction thresholds which are 10.4 µg/m³ for PM₁₀ and PM_{2.5}.

This provides a very conservative threshold for determining the significance of project impacts.

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.

Table 4.3.S: Localized Assessment – Construction and Operation, Year 2027 Maximum Impacts Outside the Project Boundaries (without Mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration ²		Standard/Threshold	Total Impact Exceeds Threshold?
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.18	2.82	20	No
	8 hour, ppm	1.84	0.05	1.89	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.071	0.149	0.18	No
	Annual, ppm	0.017	0.003	0.020	0.030	No
PM ₁₀	24 hour, µg/m ³	NA	2.2	2.2	2.5 ³	No
	Annual, µg/m ³	NA	0.8	0.8	1.0	No
PM _{2.5}	24 hour, µg/m ³	NA	1.1	1.1	2.5 ³	No

µg/m³ = micrograms per cubic meter (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

² Highest impacts at any receptor located outside of the boundaries of the project generally occur in the residential areas to the east of the project across Gilman Springs Road

³ During periods when both construction and operation overlap the SCAQMD recommends the operational significance thresholds for PM₁₀ and PM_{2.5} as opposed to the construction thresholds which are 10.4 µg/m³ for PM₁₀ and PM_{2.5}.

This provides a very conservative threshold for determining the significance of project impacts.

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.

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Localized Air Quality Impact Analysis, 2035. The year 2035 represents a long-term planning year when both phases of the project would be fully in operation. Operational emissions during 2035 were estimated based on the project’s trip generation and project-related travel along the local roadway network within and along the project boundaries. Table 4.3.T shows the maximum localized air quality impacts for 2035 relative to the background air quality levels at the existing sensitive receptors located within the project boundaries. Table 4.3.U identifies the highest localized impacts for sensitive receptors located outside of the project boundaries. These latter impacts were found within the residential areas located to the west of the project across Redlands Boulevard. As shown in Table 4.3.T, the concentrations of PM₁₀ exceed the SCAQMD’s significance thresholds due principally to the inclusion of entrained road dust in the impact assessment and would, therefore, represent a significant impact without mitigation. Table 4.3.U indicates that no receptor located outside of the project boundary would exceed any significance threshold.

Table 4.3.T: Localized Assessment – Project Operation Full Build Out, Year 2035 Maximum Impacts Within the Project Boundaries (without Mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration		Standard/Threshold	Total Impact Exceeds Threshold?
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.06	2.70	20	No
	8 hour, ppm	1.84	0.02	1.87	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.036	0.114	0.18	No
	National 1 hour, ppm	0.060	0.031	0.089	0.100	No
	Annual, ppm	0.017	0.006	0.023	0.030	No
PM ₁₀	24 hour, µg/m ³	NA	5.5	5.5	2.5	Yes
	Annual, µg/m ³	NA	3.7	3.7	1.0	Yes
PM _{2.5}	24 hour, µg/m ³	NA	1.5	1.5	2.5	No

µg/m³ = micrograms per cubic meter (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

Table 4.3.U: Localized Assessment – Project Operation, Year 2035 Maximum Impacts Outside of the Project Boundaries (without Mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration		Standard/Threshold	Total Impact Exceeds Threshold?
			Project Local Impact	Total (Background + Project)		
Carbon Monoxide	1 hour, ppm	2.64	0.04	2.68	20	No
	8 hour, ppm	1.84	0.01	1.85	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.078	0.027	0.105	0.18	No
	National 1 hour, ppm	0.058	0.022	0.080	0.100	No
	Annual, ppm	0.017	0.002	0.019	0.030	No
PM ₁₀	24 hour, µg/m ³	NA	2.0	2.0	2.5	No

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Table 4.3.U: Localized Assessment – Project Operation, Year 2035 Maximum Impacts Outside of the Project Boundaries (without Mitigation) (revised)

Pollutant	Averaging Time, Units	Existing Background ¹	Air Concentration		Standard/Threshold	Total Impact Exceeds Threshold?
			Project Local Impact	Total (Background + Project)		
	Annual, µg/m ³	NA	0.9	0.9	1.0	No
PM _{2.5}	24 hour, µg/m ³	NA	0.7	0.7	2.5	No

µg/m³ = micrograms per cubic meter (a concentration unit)

NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM₁₀ or PM_{2.5}

¹ Background data for 2012 for CO and nitrogen dioxide derived as the highest air quality measured data during the 4-year time period of 2009 to 2012

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

Summary. The localized significance analysis demonstrates that without mitigation, the project would exceed the localized significance thresholds for NO₂, PM₁₀, or PM_{2.5} for one or more of the LST assessment years (2021, 2027, or 2035) analyzed under this revised LST assessment. Therefore, according to this criterion, the air pollutant emissions would result in a significant impact and could exceed or contribute to an exceedance of the ambient air quality standards for NO₂, PM₁₀, and PM_{2.5}.

Mitigation Measures. Mitigation measures identified previously under Impact 4.3.6.2 (**Mitigation Measures 4.3.6.2A, 4.3.6.2B, and 4.3.6.2D**) to reduce construction emissions of criteria pollutants are required. The project will also be required to comply with SCAQMD Rules 402 and 403. Additionally, the following mitigation measures are required to reduce emissions of criteria pollutants during project operations.

4.3.6.3A Prior to issuance of occupancy permits for each warehouse building within the WLCSP, the developer shall demonstrate to the City that vehicles can access the building using paved roads and parking lots.

4.3.6.3B The following shall be implemented as indicated:

Prior to Issuance of a Certificate of Occupancy

- a) Signs shall be prominently displayed informing truck drivers about the California Air Resources Board diesel idling regulations, and the prohibition of parking in residential areas.
- b) Signs shall be prominently displayed in all dock and delivery areas advising of the following: engines shall be turned off when not in use; trucks shall not idle for more than three consecutive minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report air quality violations.
- c) Signs shall be installed at each exit driveway providing directional information to the City's truck route. Text on the sign shall read "To Truck Route" with a directional arrow. Truck routes shall be clearly marked per the City Municipal Code.

On an Ongoing Basis

- d) Tenants shall maintain records on fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles are maintained pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

- e) Tenant's staff in charge of keeping vehicle records shall be trained/certified in diesel technologies, by attending California Air Resources Board approved courses (such as the free, one-day Course #512). Documentation of said training shall be maintained on-site and be available for inspection by the City.
- f) Tenants shall be encouraged to become a SmartWay Partner.
- g) Tenants shall be encouraged to utilize SmartWay 1.0 or greater carriers.
- h) Tenants' fleets shall be in compliance with all current air quality regulations for on-road trucks including but not limited to California Air Resources Board's Heavy-Duty Greenhouse Gas Regulation and Truck and Bus Regulation.
- i) Information shall be posted in a prominent location available to truck drivers regarding alternative fueling technologies and the availability of such fuels in the immediate area of the World Logistics Center.
- j) Tenants shall be encouraged to apply for incentive funding (such as the Voucher Incentive Program [VIP], Carl Moyer, etc.) to upgrade their fleet.
- k) All yard trucks (yard dogs/yard goats/yard jockeys/yard hostlers) shall be powered by electricity, natural gas, propane, or an equivalent non-diesel fuel. Any off-road engines in the yard trucks shall have emissions standards equal to Tier 4 Interim or greater. Any on-road engines in the yard trucks shall have emissions standards that meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
- l) All diesel trucks entering logistics sites shall meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Facility operators shall maintain a log of all trucks entering the facility to document that the truck usage meets these emission standards. This log shall be available for inspection by City staff at any time.
- m) All standby emergency generators shall be fueled by natural gas, propane, or any non-diesel fuel.
- n) Truck and vehicle idling shall be limited to three (3) minutes.

4.3.6.3C Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area, a publically-accessible fueling station shall be operational within the Specific Plan area offering alternative fuels (natural gas, electricity, etc.) for purchase by the motoring public. Any fueling station shall be placed a minimum of 1000 feet from any off-site sensitive receptors or off-site zoned sensitive uses. This facility may be established in connection with the convenience store required in Mitigation Measure 4.3.6.3D.

4.3.6.3D Prior to the issuance of building permits for more than 25 million square feet of logistics warehousing within the Specific Plan area a site shall be operational within the Specific Plan area offering food and convenience items for purchase by the motoring public. This facility may be established in connection with the fueling station required in Mitigation Measure 4.3.6.3C.

4.3.6.3E Refrigerated warehouse space is prohibited unless it can be demonstrated that the environmental impacts resulting from the inclusion of refrigerated space and its associated facilities, including, but not limited to, refrigeration units in vehicles serving the logistics warehouse, do not exceed any environmental impact for the entire World Logistics Center identified in the program Environmental Impact Report. Such

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environmental analysis shall be provided with any warehouse plot plan proposing refrigerated space. Any such proposal shall include electrical hookups at dock doors to provide power for vehicles equipped with Transportation Refrigeration Units (TRUs).

Level of Significance After Mitigation. Significant and unavoidable. Table 4.3.V compares the project impacts before and after mitigation for those assessment conditions and pollutants that indicated a significant impact before mitigation. After application of mitigation, the project would continue to exceed the localized significance thresholds at one or more of the existing residences located within the project boundaries for PM₁₀ (24-hour and annual) all assessment conditions. Mitigation does reduce impacts from NO₂ emissions. The project’s localized impacts would not exceed any significance thresholds for receptors located outside of the project boundaries.

In summary, those residents inside the project boundaries could be exposed to significant short-term and long-term PM₁₀ concentrations on an ongoing basis. The health effects from particulate matter were discussed earlier and could include the following:

- Particulate matter can cause the following health effects from short-term (24-hour) exposure: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravate existing lung disease, causing asthma attacks and acute bronchitis; and/or those with heart disease can suffer heart attacks and arrhythmias.
- Particulate matter can cause the following health effects from long-term exposure (annual): reduced lung function; chronic bronchitis; changes in lung morphology; and/or death.

Table 4.3.V: Comparison of Local Project Air Quality Impacts Before and After Mitigation

Assessment Condition	Location	Pollutant, Averaging Time, Units	Total Impact Before Mitigation ⁽¹⁾	Total Impact After Mitigation	Significance Threshold	Exceeds Threshold After Mitigation?
Project Phase 1 (2012)	Inside Project Boundaries	National NO ₂ 1-hour, ppm	0.113	0.089	0.100	No
		PM ₁₀ 24 hour, µg/m ³	5.4	4.4	2.5	Yes
		PM ₁₀ , Annual, µg/m ³	3.4	2.8	1.0	Yes
	Outside	PM ₁₀ , Annual, µg/m ³	1.1	0.9	1.0	No
Project Phase 1 and Phase 2 Full Build Out (2012)	Inside Project Boundaries	National NO ₂ 1-hour, ppm	0.133	0.094	0.100	No
		PM ₁₀ 24-hour, µg/m ³	7.2	6.9	2.5	Yes
		PM ₁₀ , Annual, µg/m ³	4.8	4.6	1.0	Yes
		PM _{2.5} 24 hour, µg/m ³	2.9	1.6	2.5	No
	Outside	National NO ₂ 1-hour, ppm	0.103	0.076	0.100	No
		PM ₁₀ , Annual, µg/m ³	1.2	0.8	1.0	No
Project Development Schedule Year 2021	Inside Project Boundaries	NO ₂ , Annual, ppm	0.033	0.027	0.030	No
		PM ₁₀ 24-hour, µg/m ³	8.9	7.6	2.5	Yes
		PM ₁₀ , Annual, µg/m ³	2.7	2.5	1.0	Yes
		PM _{2.5} 24 hour, µg/m ³	3.7	1.4	2.5	No
	Outside Project Boundaries	NO ₂ , Annual, ppm	0.032	0.026	0.030	No
		PM ₁₀ 24-hour, µg/m ³	3.5	2.3	2.5	No

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Table 4.3.V: Comparison of Local Project Air Quality Impacts Before and After Mitigation

Assessment Condition	Location	Pollutant, Averaging Time, Units	Total Impact Before Mitigation ⁽¹⁾	Total Impact After Mitigation	Significance Threshold	Exceeds Threshold After Mitigation?
Project Development Schedule Year 2027	Inside Project Boundaries	PM ₁₀ 24-hour, µg/m ³	5.5	5.4	2.5	Yes
		PM ₁₀ Annual, µg/m ³	3.3	1.9	1.0	Yes
Project Development Schedule Year 2035 Build Out	Inside Project Boundaries	PM ₁₀ 24 hour, µg/m ³	5.5	5.5	2.5	Yes
		PM ₁₀ Annual, µg/m ³	3.7	3.7	1.0	Yes

Notes: µg/m³ = micrograms per cubic meter (a unit of concentration); ppm = parts per million (a unit of concentration)

⁽¹⁾ Total Impacts include the incremental impacts from the project plus the pollutant background; see Tables 4.3.M to 4.3.U for the total impacts for the various assessment conditions prior to the application of mitigation.

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.

Table 4.3.W: Operational Regional Air Pollutant Emissions (Worst-Case Scenario)

Scenario	Source	Emissions (pounds per day)				
		VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Phase 1 2012 emission factors	Mobile	377	5,141	3,144	746	311
	Architectural Coatings	146	0	0	0	0
	Consumer Products	117	0	0	0	0
	Natural Gas	<1	2	2	<1	<1
	Onsite equipment	5	138	51	1	1
	Total	645	5,281	3,197	747	312
Buildout 2012 emission factors	Mobile	666	9,057	5,531	1,308	547
	Architectural Coatings	258	0	0	0	0
	Consumer Products	207	0	0	0	0
	Natural Gas	<1	4	3	0	<1
	Onsite equipment	9	245	90	2	2
	Total	1,140	9,306	5,624	1,310	549
Significance Threshold		55	55	550	150	55
Significant Impact?		Yes	Yes	Yes	Yes	Yes

Notes: VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide
PM₁₀ and PM_{2.5} = particulate matter <1 = less than one

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.

4.3.6.4 Long-Term Operational Emissions

Impact 4.3.6.4: *Implementation of the proposed project may have the potential to exceed applicable daily thresholds for operational activities.*

Threshold	<p>Would the proposed project violate any AAQS or contribute to an existing or projected air quality violation; or expose sensitive receptors to pollutants?</p> <p>For long-term operations, the applicable daily thresholds are:</p> <p>- 55 pounds of VOC;</p>
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- 55 pounds of NO_x;
- 550 pounds of CO;
- 150 pounds of PM₁₀;
- 55 pounds of PM_{2.5}; and
- 150 pounds of SO_x.

Long-term air pollutant emission impacts that would result from the proposed project are those associated with stationary sources and mobile sources involving any project-related change (e.g., emissions from the use of motor vehicles by project-generated traffic). This analysis assesses the mobile source emissions generated by vehicles driving to and from the proposed land uses, as well as area source emissions generated by project maintenance operations.

Worst-Case Scenario. Projected emissions resulting from operational activities of the proposed project under the worst-case scenario are identified in Table 4.3.W.

Emissions from the existing on-site residences and fugitive dust are not included in the worst-case analysis. In addition, there may be minor emissions of VOC from the fueling station, depending on what type of fuel is used. However, details regarding the fueling station are currently unknown so the emission source is not estimated. This is a worst-case analysis because it assumes that the entire project would be built-out in 2012. The motor vehicle and truck emission factors are from 2012, which assumes a “dirtier” fleet than would be the case in later years. In addition, no reductions are taken for mitigation measures.

As identified in Table 4.3.W, operational emissions for the proposed project would exceed SCAQMD daily operational thresholds for all criteria pollutants with the exception of SO_x for the “worst-case” 2012 scenario.

Operational Regional Emissions. Table 4.3.X shows the detailed operational emission sources generated both on site and off site for Phase 1 (2022) and buildout. The table shows particulate matter (PM₁₀ and PM_{2.5}) divided into dust and exhaust sources. As shown in the table, emissions of VOC, NO_x, CO, PM₁₀, and PM_{2.5} are significant after completion of Phase 1 and after full buildout.

Table 4.3.Y shows the operational emissions year by year using future year emission factors: year 2022 for Phase 1 (2016 to 2022) and year 2035 for Phase 2 (2023 to buildout). The VOC, NO_x, CO, PM₁₀, and PM_{2.5} emissions would be over the SCAQMD’s significance thresholds. The emissions demonstrate that although the number of vehicles and trucks would increase year by year, the emissions do not increase dramatically because the per-vehicle emission factors decrease over time as cleaner vehicles enter the fleet over time.

Combined Construction and Operation. There would be overlapping of construction and operational emissions with project implementation. The maximum daily operational emissions as shown in Table 4.3.Y were added to the maximum daily construction emissions (from Table 4.3.K) and are shown in Table 4.3.Z, which shows all pollutants for all years exceed the SCAQMD thresholds, with the exception of SO_x emissions. SO_x are not shown in the table as they are far below the significance threshold of 150 pounds per day.

As identified in the preceding tables, project-related air quality impacts for all criteria pollutants, with the exception of SO_x, would be significant and mitigation measures are required.

Mitigation Measures. The mitigation measures previously identified under Impact 4.3.6.3 (**Mitigation Measures 4.3.6.3A through 4.3.6.3E**) would reduce operational emissions of criteria pollutants associated with the project. Additionally, the following mitigation measure is required:

Table 4.3.X: Operational Regional Air Pollutant Emissions (Detail, Unmitigated)

Phase	Source	Emissions (pounds/day)										
		VOC	NO _x	CO	PM ₁₀ Dust	PM ₁₀ Exh.	PM ₁₀ Total	PM _{2.5} Dust	PM _{2.5} Exh.	PM _{2.5} Total		
Existing Phase 1	Tractor, dust	<1	5	3	352	<1	352	77	<1	77		
	Mobile	106	1,591	1,068	612	9	620	164	8	172		
	Architectural Coatings	146	0	0	0	0	0	0	0	0		
	Consumer Products	117	0	0	0	0	0	0	0	0		
	Natural Gas	<1	2	2	0	<1	<1	0	<1	0		
	On-site Equipment	5	138	51	0	1	1	0	1	1		
	Total	374	1,731	1,121	612	10	621	164	9	173		
Buildout	Mobile	120	1,031	1,286	1,114	6	1,120	298	6	303		
	Architectural Coatings	258	0	0	0	0	0	0	0	0		
	Consumer Products	207	0	0	0	0	0	0	0	0		
	Natural Gas	<1	4	3	0	<1	<1	0	<1	<1		
	On-site Equipment	9	245	90	0	2	2	0	2	2		
	Total	594	1,280	1,379	1,114	8	1,122	298	8	305		
	Net increase	594	1,275	1,376	762	8	770	221	8	228		
Significance Threshold	55	55	550	None	None	150	None	None	55			
Significant Impact?	Yes	Yes	Yes	--	--	Yes	--	--	Yes			

Notes: VOC = volatile organic compounds NO_x = nitrogen oxides CO = carbon monoxide PM₁₀ and PM_{2.5} = particulate matter Exh. = exhaust <1 = less than 1 Net increase = total buildout minus existing
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

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Table 4.3.Y: Operational Regional Air Pollutant Emissions (Year by Year, pounds per day, unmitigated)

Year	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2016	34	159	103	*	57	16
2017	69	317	205	*	114	32
2018	114	528	342	*	190	53
2019	160	740	479	*	266	74
2020	245	1,132	733	*	407	114
2021	330	1,525	987	*	547	153
2022	374	1,732	1,121	*	622	174
2023	395	1,690	1,145	*	669	186
2024	415	1,647	1,169	*	715	199
2025	445	1,587	1,203	*	782	216
2026	478	1,519	1,242	*	858	236
2027	511	1,450	1,281	*	934	256
2028	544	1,382	1,321	*	1,010	276
2029	566	1,337	1,346	*	1,059	289
2030	588	1,292	1,372	*	1,109	302
Buildout	594	1,280	1,379	*	1,123	306
SCAQMD Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes

- Emissions are from local vehicles, trucks, natural gas, emergency generators, forklifts, yard trucks, painting, and consumer products. There is no reduction from existing onsite emissions.
 - Emissions for Phase 1 are years 2016-2022. Emissions for Phase 2 are year 2023-buildout operational emissions are assumed to be zero in 2015 when project construction commences.
 - PM₁₀ and PM_{2.5} emissions include exhaust and road dust.
 - Landscaping emissions are negligible.
 - * Sulfur dioxide emissions as estimated in the Draft EIR were substantially less than the threshold of 150 pounds per day. Thus, emissions reflecting decreased vehicle miles traveled would also be less than significant.
- VOC = volatile organic compounds; NO_x = nitrogen oxides; SO₂ = sulfur dioxide; CO = carbon monoxide; PM₁₀ and PM_{2.5} = particulate matter
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

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Table 4.3.Z: Combined Construction and Operational Regional Air Pollutant Emissions (Year by Year, pounds per day, unmitigated)

Year	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
2015 (construction)	128	1,463	871	193	84
2016	301	1,000	633	183	66
2017	382	1,749	1,054	306	114
2018	381	1,369	872	316	103
2019	531	2,855	1,705	532	198
2020	522	2,093	1,329	543	171
2021	633	2,784	1,761	731	229
2022	661	2,789	1,789	791	240
2023	712	3,079	2,030	876	273
2024	713	2,822	1,923	898	272
2025	756	2,876	2,057	986	299
2026	744	2,360	1,772	984	286
2027	774	2,179	2,031	1,102	308
2028	796	1,989	1,987	1,159	318
2029	789	1,655	1,803	1,153	309
2030	833	1,712	1,942	1,249	337
Buildout (operation only)	594	1,280	1,379	1,123	306
SCAQMD Threshold	55	55	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes

- Year 2015 contains construction emissions only; buildout contains operational emissions only
 - Sulfur oxide (SO_x) emissions are substantially under the threshold of 150 pounds per day
 - Reduction from existing onsite emissions are not included.
 VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide; PM₁₀ and PM_{2.5} = particulate matter
 Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

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- 4.3.6.4A** The following measures shall be incorporated as conditions to any Plot Plan approval within the Specific Plan:
- a) All tenants shall be required to participate in Riverside County’s Rideshare Program.
 - b) Storage lockers shall be provided in each building for a minimum of three percent of the full-time equivalent employees based on a ratio of 0.50 employees per 1,000 square feet of building area. Lockers shall be located in proximity to required bicycle storage facilities.
 - c) Class II bike lanes shall be incorporated into the design for all project streets.
 - d) The project shall incorporate pedestrian pathways between on-site uses.
 - e) Site design and building placement shall provide pedestrian connections between internal and external facilities.
 - f) The project shall provide pedestrian connections to residential uses within 0.25 mile from the project site.
 - g) A minimum of two electric vehicle-charging stations for automobiles or light-duty trucks shall be provided at each building. In addition, parking facilities with 100 parking spaces or more shall be designed and constructed so that at least three percent of the total parking spaces are capable of supporting future electric vehicle supply equipment (EVSE) charging locations. Only sufficient sizing of conduit and service capacity to install Level 2 Electric Vehicle Supply Equipment (EVSE) or greater are required to be installed at the time of construction.
 - h) Each building shall provide indoor and/or outdoor - bicycle storage space consistent with the City Municipal Code and the California Green Building Standards Code.- Each building shall provide a minimum of two shower and changing facilities for employees.
 - i) Each building shall provide preferred and designated parking for any combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles equivalent to the number identified in California Green Building Standards Code Section 5.106.5.2 or the Moreno Valley Municipal Code whichever requires the higher number of carpool/vanpool stalls.
 - j) The following information shall be provided to tenants: onsite electric vehicle charging locations and instructions, bicycle parking, shower facilities, transit availability and the schedules, telecommunicating benefits, alternative work schedule benefits, and energy efficiency.

It is important to note that, in addition to the operational activity mitigation measures identified previously, future development would need to incorporate physical attributes and operational programs that will act to generally reduce operational-source pollutant emissions including GHG emissions. These project characteristics are identified in Section 4.7, *Climate Change and Greenhouse Gas Emissions*, of this EIR.

Level of Significance after Mitigation. Mitigated operational emissions for full buildout are shown in Table 4.3.AA. Also shown in the table are existing emissions from the onsite agricultural activities. When those emissions are subtracted from the project emissions, emissions are still over the significance thresholds. Note that the emissions are based on conservative assumptions such as truck trips and miles traveled. Even with mitigation, emissions are still significant. Despite implementation of mitigation measures, emissions of criteria pollutants would still exceed SCAQMD significance thresholds resulting in a significant and unavoidable operational air quality impact. Therefore,

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Table 4.3.AA: Operational Regional Air Pollutant Emissions (Mitigated) (Revised)

Scenario	Source	Emissions (pounds per day)				
		VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Buildout	Vehicles: Local and trucks	119		1,286	1,120	303
	Architectural Coatings	258	0	0	0	0
	Consumer Products	207	0	0	0	0
	Natural Gas	<1	4	3	<1	<1
	Onsite Equipment	8	91	107	<1	<1
	Subtotal – Project Emissions	592	1,096	1,396	1,120	303
	<i>Existing</i>	<1	5	3	352	77
	Net Increase	592	1,091	1,393	768	226
	Significance Threshold	55	55	550	150	55
	Significant Impact?	Yes	Yes	Yes	Yes	Yes

- PM₁₀ and PM_{2.5} emissions include exhaust and road dust.
 - Landscaping emissions are negligible.
 - Sulfur oxides emissions are under the 150 pounds per day significance threshold and at buildout would be less than 23 pounds per day.
- VOC = volatile organic compounds NO_x = nitrogen oxides CO = carbon monoxide PM₁₀ and PM_{2.5} = particulate matter
 Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

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there could be cumulative health effects from ozone, PM₁₀, and PM_{2.5} as described earlier in this section and summarized as follows:

- Ozone can cause the following health effects: irritate respiratory system; reduce lung function; breathing pattern changes; reduce breathing capacity; inflame and damage cells that line the lungs; make lungs more susceptible to infection; aggravate asthma; aggravate other chronic lung diseases; cause permanent lung damage; some immunological changes; and/or increase mortality risk.
- Particulate matter (PM₁₀ and PM_{2.5}) can cause the following health effects from short-term (hours/days) exposure: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravate existing lung disease, causing asthma attacks and acute bronchitis; and/or those with heart disease can suffer heart attacks and arrhythmias.
- Particulate matter can cause the following health effects from long-term exposure: reduced lung function; chronic bronchitis; changes in lung morphology; and/or death.

Operational emissions (not including construction emissions) at buildout in this revised analysis as compared with the estimates in the DEIR are as follows:

- Emissions of VOC have decreased slightly by 140 pounds/day, in accordance with a reduction in square feet for the project and a revision of emission factors.
- For the unmitigated emissions, NO_x, CO, and PM₁₀ in the revised analysis are about 1,800, 2,200, and 600 pounds per day lower than in the DEIR, respectively. For the mitigated emissions, NO_x, CO, and PM₁₀ in the revised analysis are about 2,000, 2,000, and 600 lower than in the DEIR, respectively. The revised emissions are lower because the emission factors for the mobile trucks and vehicles have been revised and because the vehicle miles traveled (VMT) has decreased. In the DEIR, the VMT at buildout for heavy duty trucks was 730,100 miles per day and in the revised analysis, the diesel vehicles is 420,400 miles per day; therefore, the VMT for diesel vehicles decreased by approximately 309,700 miles per day. The VMT decreased because the analysis in the DEIR assumed a conservative, but arbitrary 50 miles per trip for all heavy duty trucks and in the revised analysis the VMT is based on actual model results for all trips as estimated in the Traffic Impact Analysis for nearly 500 freeway and roadway segments. The VMT for light duty vehicles increased by approximately 64,600 miles: in the DEIR, the VMT for light duty vehicles was 549,700 miles per day and in the revised analysis, the VMT for gasoline vehicles is 614,300 miles per day.
- Emissions of PM_{2.5} in the revised analysis have increased by approximately 150 pounds per day because of the use of updated emission factors.

During overlap of construction and operation, VOC, NO_x, CO, PM₁₀, and PM_{2.5} would continue to exceed SCAQMD significance thresholds after mitigation, as shown in Table 4.3.AB. Therefore, impacts are significant and unavoidable. The emissions do not take into account the existing onsite agricultural emissions.

Table 4.3.AB: Combined Construction and Operational Regional Air Pollutant Emissions (Year by Year, pounds per day) – Mitigated (revised)

Year	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
2015	31	523	871	130	26
2016	167	465	631	143	29
2017	209	716	1,052	243	57
2018	243	683	868	275	65
2019	311	1,200	1,699	444	117
2020	371	1,069	1,319	495	127
2021	459	1,414	1,748	671	174

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Table 4.3.AB: Combined Construction and Operational Regional Air Pollutant Emissions (Year by Year, pounds per day) – Mitigated (revised)

Year	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
2022	500	1,482	1,774	739	192
2023	530	1,633	2,018	812	214
2024	547	1,558	1,914	843	220
2025	583	1,651	2,53	926	245
2026	603	1,428	1,773	941	247
2027	650	1,639	2,036	1,077	285
2028	682	1,599	1,997	1,138	299
2029	695	1,455	1,815	1,431	300
2030	725	1,562	1,958	1,236	325
Buildout	593	1,097	1,396	1,121	304
SCAQMD Threshold	55	55	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes

- Year 2015 contains construction emissions only; buildout contains operational emissions only
 - Sulfur oxide (SOx) emissions for construction are contained in the CalEEMod output in Appendix A; the emissions are substantially under the threshold of 150 pounds per day.
 - Emissions do not include existing onsite emissions.
- VOC = volatile organic compounds NO_x = nitrogen oxides CO = carbon monoxide PM₁₀ and PM_{2.5} = particulate matter
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

4.3.6.5 Impacts to Sensitive Receptors

Impact 4.3.6.5: *Implementation of the proposed project may have the potential to result in impacts to sensitive receptors.*

Threshold	<p>Would the proposed project expose sensitive receptors to substantial pollutant concentrations?</p> <p>For localized air quality impacts, the applicable thresholds are:</p> <ul style="list-style-type: none"> - 20 ppm (1 hour) and 9 ppm (8 hours) of CO during construction and operation; - 0.18 ppm (State 1 hour), 0.100 ppm National 1 hour), and 0.030 ppm (Annual) of NO_x during construction and operation; - 10.4 µg/m³ (24-hours) and 1 µg/m³ (Annual) of PM₁₀ during construction - 2.5 µg/m³ (24 hours) and 1.0 µg/m³ (Annual) of PM₁₀ during operations; and - 2.5 µg/m³ (24 hours) of PM_{2.5} during operations. - During time periods when construction and operational activities occur at the same time, the SCAQMD recommends application of the significance threshold for operations. <p>For health risk impacts, the applicable thresholds are:</p> <ul style="list-style-type: none"> - Maximum Individual Cancer Risk: An increased cancer risk greater than 10 in 1 million at any receptor location; - Cancer burden: An increase in cancer burden of 0.5 or - Non-cancer chronic hazard indices (HI): A cumulative increase for any target organ system exceeding 1.0 at any receptor location.
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Localized Air Quality Impacts. The construction and operation of the project would result in the emissions of carbon monoxide, oxides of nitrogen, and particulate matter. As noted in the discussion of Impact 4.3.6.3, construction and operation of the proposed project have the potential to exceed localized air quality significance thresholds for oxides of nitrogen (NO_x) and particulate matter (PM₁₀ and PM_{2.5}) that may expose sensitive receptors to substantial pollutant concentrations. These impacts are shown in Impact 4.3.6.3.

Acute and Chronic Health Risk Impacts. Acute and chronic health risk impact analysis examines the increased risk associated with air pollution for non-cancer health outcomes. Since these are non-cancer health impacts, as described below, the impacts are analyzed separately from increased cancer risk associated with air pollution.

Past studies have indicated that exposures to diesel PM can have both short-term and long term non-cancer health effects. The construction and operation of the project would not emit any toxic chemicals in any significant quantity other than vehicle exhaust. While there may be other toxic substances in use on site, compliance with State and Federal handling regulations will bring these emissions to below a level of significance.

Exposure to diesel exhaust can have immediate (acute) health effects, such as irritation of the eyes, nose, throat, and lungs, and can cause coughs, headaches, light headedness, and nausea. In studies with human volunteers, diesel exhaust particles made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. However, according to the rulemaking on *Identifying Particulate Emissions from Diesel-Fueled Engines as a Toxic Air Contaminant* (CARB 1998), the available data from studies of humans exposed to diesel exhaust are not sufficient for deriving an acute non-cancer health risk guidance value.

The revised analysis, however, does derive an estimate of acute non-cancer risks by examining the acute health effects of the various toxic components that comprise diesel and gasoline emissions. There is specific guidance for estimating the acute non-cancer hazards from these toxic components based on chemical profiles established by the CARB which was used in the revised analysis to determine the project's acute non-cancer hazards.

To determine the project's *chronic* non-cancer hazard impact, the highest annual diesel PM concentration was determined covering the years 2015 (the commencement of project construction) to 2035 (the full build out of the project). In this regard, the highest annual average diesel PM concentration prior to mitigation determined through air dispersion modeling was 1.02 ug/m³, at an existing residence located within the project boundaries. This diesel PM concentration was due to the impacts of diesel PM emissions from the off-road construction equipment and operation equipment. This level of diesel PM impact results in a chronic non-hazard index of 0.20. This hazard index is less than the SCAQMD's significance level of 1.0, and is, therefore, less than significant.

The estimation of the *acute* non-cancer hazard index requires the estimation of the maximum 1-hour impacts of total organic gases (TOG). Estimates of the project's maximum 1-hour TOG emissions were derived from the project's peak hour traffic data along the nearly 500 roadway segments contained within the assessment and then speciated or broken down into the various toxic air contaminant components by fuel type, gasoline and diesel. The acute non-cancer hazard index was determined for a worst-case condition that assumed the project would be completely built out in 2012 with the project's attendant traffic and emission estimates as they would exist in 2012. This condition is the same as the Project Phase 1 and Phase 2 Full Build Out (2012) condition assumed in the Localized Significance Threshold assessment provided earlier. Based on this information, the maximum acute non-cancer hazard index found at any receptor within the model domain was 0.07, which is less than the SCAQMD's non-cancer hazard index of 1.0, and, therefore, is less than significant.

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Therefore, the potential for short-term acute and chronic exposure from diesel exhaust are considered to be less than significant and no mitigation is required.

Cancer Risks. As noted in Section 4.3.3, *Methodology*, the project health risk assessment examined the following condition for impacts to both sensitive/residential and worker receptors:

Proposed Project Development condition which evaluates the impacts of project-related construction and operational traffic diesel PM emissions as if the project were built out in accordance with its proposed phased construction and operational buildout schedule commencing with the construction of Phase 1 in 2015, build out of Phase 1 in 2022, and the full build out in 2035.

This HRA is being provided to allow decision makers to see the cancer-related impacts of the proposed project in the assumption that new technology diesel exhaust cause cancer, contrary to what was found by the HEI study. The revised mitigation conditions require that all diesel trucks accessing the project during operation be model year 2010 or newer and that all on-site equipment be Tier 4. The results of the HEI Study indicate that the project mitigation requiring the application of Model Year 2010 engines as well as the use of Tier 4-compliant off-road construction equipment are not expected to result in emissions that would be associated with the formation of cancer in exposed individuals.

Cancer Risk for Sensitive/Residential Receptors. To provide context with the methodology shown in the DEIR, Table 4.3.AC presents the results of the health risk assessment as presented in the DEIR. The cancer risk estimated applied the “Former OEHHA Guidance” and the now out-of-date EMFAC2011 mobile source emission model at several receptor locations inside and outside of the project boundary. For reference, a risk level of 1 in a million implies a likelihood that up to one person, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the specific concentration of diesel PM over the duration of the exposure. This risk would be an excess cancer risk that is in addition to any cancer risk borne by a person not exposed to these air toxics.¹

Table 4.3.AD presents the estimated cancer risks applying the “Current OEHHA Guidance” and the use of the EMFAC2014 mobile source emission model. The results are provided separately for project construction diesel PM emissions, operational diesel PM emissions, and the total project diesel PM emissions prior to the application of emission mitigation. As noted therein, the estimated cancer risks are far greater than the corresponding risks estimated using the “Former OEHHA Guidance”. This is because of the use of the age-specific factors (e.g., age-sensitivity factors and daily breathing rates) used in the “Current OEHHA Guidance” during the first 16 years, and in particular the first 2 years, of the 30-year exposure duration that greatly influence the risks over the entire 30-year exposure duration. The “Former OEHHA Guidance” used a 70-year exposure but did not make use of any age-specific factors. Because of the use of the age-specific early-in-life factors under the “Current OEHHA Guidance”, the estimated cancer risks would result in an exceedance of the 10 in a million cancer risk significance threshold in the first year of the project construction in 2015 alone. As can be seen from Table 4.3.AD the construction impacts contribute the greatest proportion of the total impact particularly under the “Current OEHHA Guidance”.

On the basis of the results shown in Table 4.3.AD based on the application of the “Current OEHHA Guidance”, the project would exceed the SCAQMD’s cancer risk significance threshold of 10 in a

¹ [Definition of a 1 in a million cancer risk from the US EPA, Technology Transfer Network Air Toxics, Glossary of Key Terms. Website: www.epa.gov/ttn/atw/natamain/gloss1.html.](http://www.epa.gov/ttn/atw/natamain/gloss1.html)

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Table 4.3.AC: Estimated Cancer Risks, 70-Year Exposure Duration for Sensitive/Residential Receptors as Shown in the Draft EIR

Receptor Location	Unmitigated			Mitigated		
	Total Incremental Cancer Risk ⁽¹⁾ (risk/million)	SCAQMD Cancer Risk Significance Threshold (risk/million)	Exceeds Threshold?	Total Incremental Cancer Risk ⁽¹⁾ (risk/million)	SCAQMD Cancer Risk Significance Threshold (risk/million)	Exceeds Threshold?
Maximum risk anywhere in the modeling domain ⁽²⁾	100.7	10	Yes	76.8	10	Yes
Maximum risk at existing residences within the project boundaries	100.7	10	Yes	76.8	10	Yes
Maximum risk at any existing residential area outside of the project boundaries ⁽³⁾	22.2	10	Yes	20.9	10	Yes

Notes:

- ⁽¹⁾ 70-year average exposures from 2015 to 2084 (includes diesel PM emissions from construction and operation); cancer risk estimates derived from the EMFAC2011 emission model and "Former OEHHA Guidance" for estimating cancer risks as presented in the Draft EIR
 - ⁽²⁾ Location is at the existing residences within the boundaries of the project
 - ⁽³⁾ Location is at the southwest corner of the project
 - ⁽⁴⁾ Location is at an undeveloped property zoned for residential at the southwest corner of the project
- Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

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Table 4.3.AD: Estimated Cancer Risks, 30-Year Exposure Duration for Sensitive/Residential Receptors, Based on the “Current OEHHA Guidance,” Without Mitigation

Receptor Location	Incremental Cancer Risk During Project Construction (risk/million)	Incremental Cancer Risk During Project Operation (risk/million)	Total Incremental Cancer Risk ⁽¹⁾ (risk/million)	SCAQMD Cancer Risk Significance Threshold (risk/million)	Exceeds Threshold?
Maximum risk anywhere in the modeling domain ⁽²⁾	180.8	6.7	187.5	10	Yes
Maximum risk at existing residences within the project boundaries ⁽³⁾	180.8	6.7	187.5	10	Yes
Maximum risk at any existing residential area outside of the project boundaries ⁽⁴⁾	47.2	2.5	49.7	10	Yes
Maximum risk at any undeveloped residentially zoned property outside of the project boundaries ⁽⁵⁾	40.5	2.7	43.2	10	Yes

Notes:

- ⁽¹⁾ 30-year average exposures from 2015 to 2044 (includes diesel PM emissions from construction and operation); cancer risk estimates derived from the EMFAC2014 emission model and “Current OEHHA Guidance” for estimating cancer risks
 - ⁽²⁾ Location is at the existing residences within the boundaries of the project
 - ⁽³⁾ Location is at the existing residences within the boundaries of the project
 - ⁽⁴⁾ Location is at the southwest corner of the project
 - ⁽⁵⁾ Location is at an undeveloped property zoned for residential at the southwest corner of the project
- Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

million prior to the application of mitigation and would represent a significant impact. However, this analysis is based on the assumption that new technology diesel exhaust cause cancer, contrary to what was found by the HEI study and discussed in more detail below.

Figures 4.3.18a and 4.3.18b show the incremental cancer risks for the project location as calculated based on the EMFAC2014 emission model and the application of the “Current OEHHA Guidance” cancer risk estimation methodology and based on the assumption that diesel exhaust from old technology engine diesel emissions can cause cancer. The figures show the results prior to the application of mitigation.

Estimates of Cancer Risk for School Site Receptors. Cancer risk at school sites in the area with the application of the “Current OEHHA Guidance” is provided in Appendix D. Prior to the application of the mitigation, the maximum cancer risk is 3.2 in a million at Ridgecrest Elementary School. The cancer risk at the proposed high school at Ironwood Avenue and Quincy Street is 3.4 in a million. Impacts at schools are less than the 10 in one million significance threshold prior to mitigation and are less than significant.

Estimates of Cancer Risk for Worker Receptors. Estimates of worker exposures were prepared based on the assumption of a 25-year exposure duration for 250 days per year and 8 hours per day as described in the methodology section above and in the revised Air Quality, Greenhouse Gas, and Health Risk Assessment Report (Appendix D). Note that the OEHHA early-in-life age factors do not apply to worker receptors. The highest worker cancer risk estimates prior to the application of mitigation are greater than the SCAQMD cancer risk threshold of 10 in a million at 10.1 in a million inside the project boundaries and 4.1 in a million outside the project boundaries.

However, this analysis is based on the assumption that new technology diesel exhaust cause cancer, contrary to what was found by the HEI study and discussed in more detail below.

Estimates of Cancer Burden. In response to comments received on the DEIR, an estimate of cancer burden was developed in this revised analysis. The cancer burden calculation provides an estimate of the increased number of cancer cases as a result of exposures to TAC emissions. The total cancer burden is the product of the number of persons in a population area (such as a census tract) and the estimated individual risk from TACs in that population area and then summed over all population areas. The SCAQMD indicates that the burden calculation include those population units having an incremental cancer risk of 1 in a million or greater.

Cancer risks were estimated at the geographical center (centroid) of 2,360 census tracts that spanned the Basin from Palm Springs to the City of Los Angeles. For the 70-year exposure duration with the inclusion of the “Current OEHHA Guidance”, the cancer burden is estimated to be 1.6 out of a population of about 880,000 individuals that were estimated to have a cancer risk of 1 in a million or more. The SCAQMD has established a threshold for cancer burden of 0.5. Therefore, the project would exceed the SCAQMD’s cancer burden significance threshold prior to the application of mitigation.

Informational Purposes: Morbidity and Mortality. There is no established threshold or approved methodology for calculating morbidity and mortality. For purposes of this assessment, morbidity is a term for describing how an external effect such as air pollution would exacerbate an existing illness and other health effect. Mortality is another term for death. The following represents the result of the calculations for long-term mortality and various morbidity health endpoints due to diesel PM for the project prior to the application of mitigation. The locations for the morbidity/mortality estimations were at the location with the highest combined annual diesel PM concentration and census tract population such that the change in diesel PM would affect the greatest number of people. A cumulative total of each mortality/morbidity health endpoint was also calculated that totals the number of added cases of an identified health endpoint at each census tract location within the entire region potentially impacted by the project emissions.

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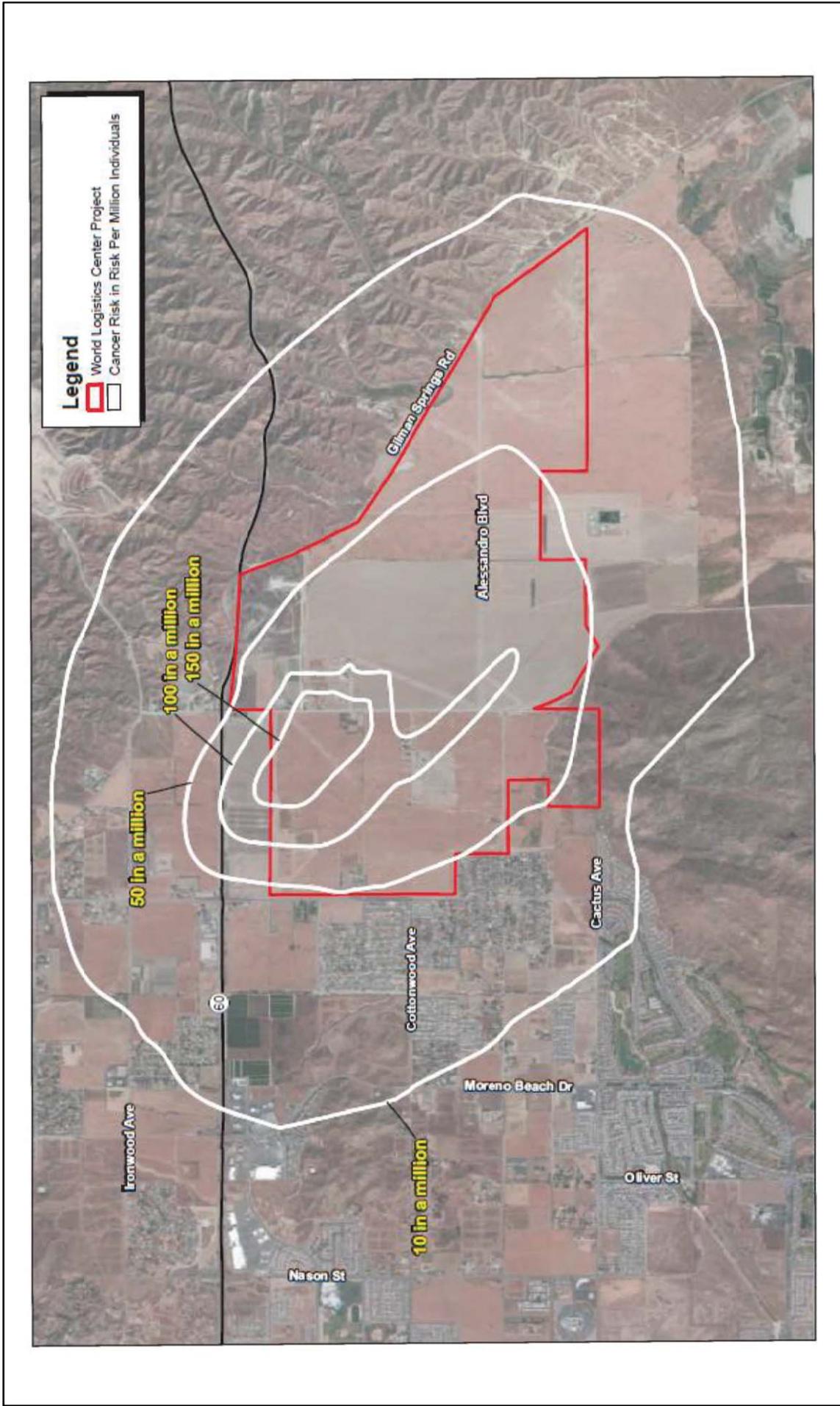


FIGURE 4.3.18B

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"Current OEHA 30-year Guidance" - No Mitigation Close-In View

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The estimates of mortality and morbidity impacts are based on the application of concentration-response functions (C-R functions) that relate the change in the number of adverse health effect incidences in a population to a change in air pollutant concentration experienced by that population. However, such estimations are subject to great uncertainty. Sources of uncertainty include emission estimates, population exposure estimates, form of C-R functions, baseline rates of mortality and morbidity that are entered into the C-R functions, and occurrence of additional not-quantified adverse health effects. It should be noted that the nature of PM as a complex mixture of various pollutants, as well as the confounding health effects of pollutants such as sulfur dioxide, NO₂, CO, and ozone that tend to co-occur with PM in ambient air, greatly increase the complexity of deriving accurate PM concentration-response functions.

Exposure to the Project's diesel PM emissions prior to mitigation would result in an increase in mortality of approximately 0.002 additional cases per year at the location where the project has its maximum impact from diesel PM emissions or 0.2 additional cases over all of the census tracts contained in the modeling domain.

Table 4.3.AE summarizes the estimates of the various morbidity health endpoints due to the emissions from the project. As shown in this table, the project would not result in a single new added case of a quantified health endpoint either at either the location where the impact would be greatest or cumulatively over the entire air dispersion modeling domain examined in this assessment (approximately 3,500 square miles, potentially impacted by the project).

Table 4.3.AE: Estimates of Various Morbidity Health Endpoints from Project Emissions Without Mitigation (new table)

Health Endpoint	Maximum Added Occurrences (cases/year)	Cumulative Occurrences over the Entire Modeling Region (cases/year)
Long-term Mortality (Ages 30+)	0.0022	0.22
Chronic Illness: Chronic Bronchitis (Age 27+)	0.010	0.99
Hospitalization: Chronic Obstructive Pulmonary Disease (Age 65+)	0.00002	0.002
Hospitalization: Pneumonia (Age 65+)	0.00003	0.003
Hospitalization: Cardiovascular (Age 65+)	0.00005	0.005
Hospitalization: Asthma (Age 0-64)	0.00001	0.001
Hospitalization: Asthma-related Emergency Visits (Ages 0-64)	0.00003	0.004

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

City of Moreno Valley General Plan. The project is consistent with the following City of Moreno Valley General Plan (2006) policies to help reduce air quality impacts to sensitive receptors:

- Policy 6.7.4 Locate heavy industrial and extraction facilities away from residential areas and sensitive receptors. Project consistency: The project would not contain heavy industrial and extraction facilities (such as a gravel mine). The project would contain warehousing, distribution, and light logistics. Therefore, the project is consistent with this policy. Nonetheless, the proposed plan places this development at the eastern end of the City, reducing the potential residential/development interface.
- Policy 6.7.5 Require grading activities to comply with South Coast Air Quality Management District's Rule 403 regarding the control of fugitive dust. Project consistency: The project would

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comply with all applicable rules and regulations. Mitigation Measure 4.3.6.2A requires that the project demonstrate compliance with Rule 403.

Mitigation Measures. The mitigation measures previously identified under other impact sections are required (**Mitigation Measures 4.1.6.1A, 4.3.6.2A, 4.3.6.2B, 4.3.6.2D, 4.3.6.3A, 4.3.6.3B, 4.3.6.3C, 4.3.6.3D, and 4.3.6.3E**) to reduce construction and operational emissions of criteria pollutants would reduce the estimated cancer risks associated with the project.

Level of Significance after Mitigation for Worker and School Children Cancer Risk. Less than Significant. The cancer risk impacts are less than the threshold of 10 in a million for workers (1.3 in one million onsite; 0.5 in one million offsite) and school children (0.7 in one million). More importantly, HRA is being provided to allow decision makers to see the cancer-related impacts of the proposed project in the assumption that new technology diesel exhaust cause cancer, contrary to what was found by the HEI study.

Level of Significance after Mitigation for Localized Particulate Matter Impacts. Significant and unavoidable. In summary, those residents inside the project boundaries could be exposed to significant short-term and long-term PM₁₀ concentrations on an ongoing basis. The health effects from particulate matter were discussed earlier and could include the following:

- Particulate matter can cause the following health effects from short-term (24-hour) exposure: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravate existing lung disease, causing asthma attacks and acute bronchitis; and/or those with heart disease can suffer heart attacks and arrhythmias.
- Particulate matter (PM₁₀) can cause the following health effects from long-term exposure (annual): reduced lung function; chronic bronchitis; changes in lung morphology; and/or death.

Level of Significance after Mitigation for Sensitive Receptor Cancer Risk. Less than significant.

Mitigation Measure 4.3.6.3B would require that all diesel trucks that access the project site be model year 2010 or later and limits truck and vehicle idling to 3 minutes. **Mitigation Measure 4.3.6.2A** would require that Tier 4 construction equipment be used on the project site. These mitigation measures would reduce the cancer risk from the project.

Mitigation Measure 4.3.6.3C may encourage alternative fueled vehicles and trucks on the project site; however, no reduction is taken. **Mitigation Measure 4.3.6.3D** may reduce vehicle miles traveled to food establishments; however, no direct reduction is taken. **Mitigation Measure 4.3.6.3E** requires that if transportation refrigeration units are to be used, electrical hookups would be required. In addition, refrigerated space is prohibited unless the impacts do not exceed any environmental impacts identified in the EIR. Therefore, it is assumed in the unmitigated and mitigated estimates that there would be no transportation refrigeration units.

Table 4.3.AF shows the cancer risks estimated with the “Current OEHHA Guidance” after application of mitigation. As noted, the cancer risks are substantially less after mitigation. However, the SCAQMD cancer risk significance threshold would continue to be exceeded at locations within the project boundaries but not at any residential areas outside of the project boundary. The large reduction in cancer risk after mitigation is attributable principally to the reduced diesel PM attributed to mitigation such as the commitment to Tier 4 construction equipment. The impact of this mitigation is largely felt during the first 3 to 5 years of construction when the “Current OEHHA Guidance” assigns large age sensitivity factors to the first few years of the 30-year exposure duration. Figure 4.3.19a and Figure 4.3.19b provided a regional and close-in view of the risks, respectively after the application of mitigation. Even so, this HRA is being provided to allow decision makers to see the cancer-related

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Table 4.3.AF: Estimated Cancer Risks, 30-Year Exposure Duration for Sensitive/Residential Receptors, Based on the “Current OEHHA Guidance,” With Mitigation

Receptor Location	Incremental Cancer Risk During Project Construction (risk/million)	Incremental Cancer Risk During Project Operation (risk/million)	Total Incremental Cancer Risk ⁽¹⁾ (risk/million)	SCAQMD Cancer Risk Significance Threshold (risk/million)	Exceeds Threshold?
Maximum risk anywhere in the modeling domain ⁽²⁾	11.4	5.6	17.0	10	Yes
Existing residences within the project boundaries					
13100 Theodore St	11.2	4.5	15.7	10	Yes
13200 Theodore St	11.1	4.5	15.6	10	Yes
13241 Theodore St	11.4	5.6	17.0	10	Yes
30220 Dracaea Ave	5.0	3.6	8.6	10	No
30240 Dracaea Ave	5.0	3.6	8.6	10	No
29080 Dracaea Ave	3.0	1.5	4.5	10	No
29140 Dracaea Ave	4.8	1.7	6.5	10	No
Maximum risk at any existing residential area outside of the project boundaries ⁽³⁾	2.7	1.6	4.3	10	No
Maximum risk at any undeveloped residentially zoned property outside of the project boundaries ⁽⁴⁾	2.1	1.9	4.0	10	No

Notes:

- ⁽¹⁾ 30-year average exposures from 2015 to 2044 (includes diesel PM emissions from construction and operation); cancer risk estimates derived from the EMFAC2014 emission model and “Current OEHHA Guidance” for estimating cancer risks
 - ⁽²⁾ Location is at the existing residences within the boundaries of the project
 - ⁽³⁾ Location is at the southwest corner of the project
 - ⁽⁴⁾ Location is at an undeveloped property zoned for residential at the southwest corner of the project
- Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

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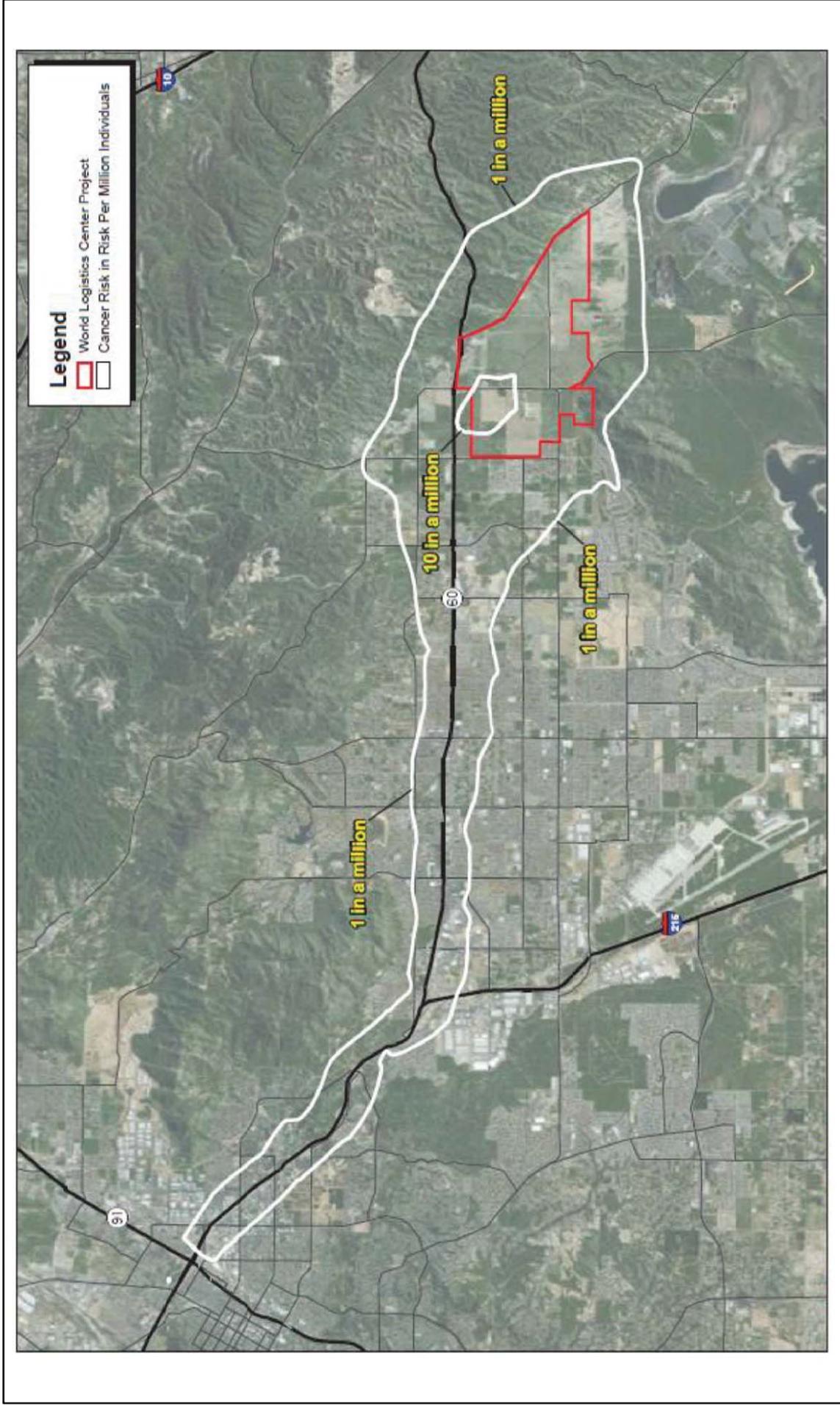


FIGURE 4.3.19A
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 Incremental Project Cancer Risk
 "Current OEHHA 30-year Guidance" - With Mitigation

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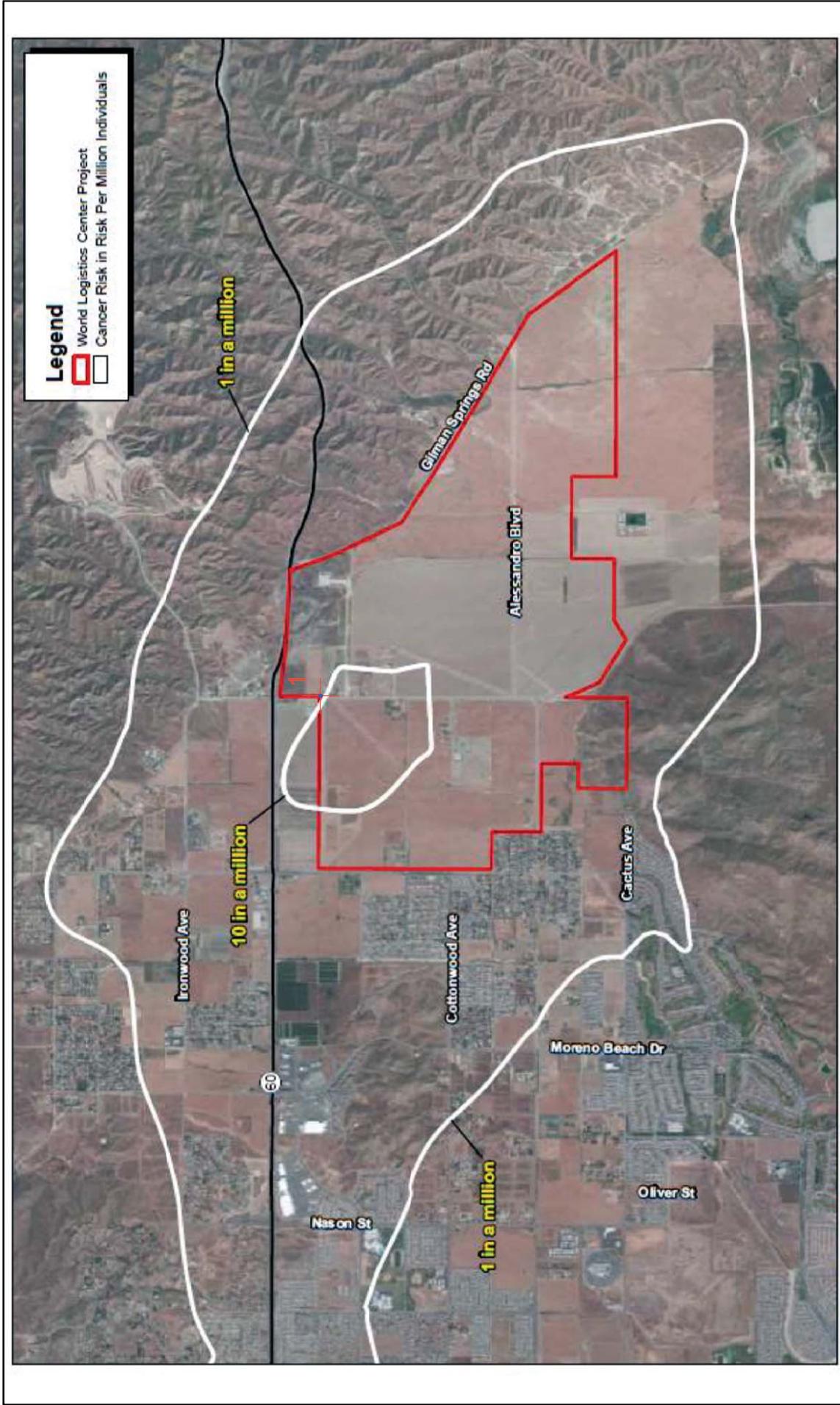


FIGURE 4.3.19B

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Incremental Project Cancer Risk
 "Current OEHHA 30-year Guidance" - With Mitigation Close-In View

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impacts of the proposed project in the assumption that new technology diesel exhaust cause cancer, contrary to what was found by the HEI study, as discussed in more detail below. Through mitigation, new technology diesel engines are required for the WLC project. The revised mitigation conditions require that all diesel trucks accessing the project during operation be model year 2010 or newer and that all on-site equipment be Tier 4. The results of the HEI Study indicate that the project mitigation requiring the application of Model Year 2010 engines as well as the use of Tier 4-compliant off-road construction equipment are not expected to result in emissions that would be associated with the formation of cancer in exposed individuals.

The HEI study clearly demonstrates that the application of new emissions control technology to diesel engines have virtually eliminated the health impacts of diesel exhaust.

Mitigation measures 4.3.6.2A and 4.3.6.3B require 2010-compliant trucks for operation and Tier 4 equipment for construction, both of which rely on diesel particulate filters similar to those tested in the HEI study. These vehicles reduce emissions by 90% when compared to 2006 vehicles and by 99% when compared to uncontrolled diesel engines. Recent emissions testing by CARB revealed that these diesel engines are cleaner than originally estimated. These findings, which are reflected in the latest CARB emissions factor model EMFAC2014, are 70% cleaner than previously estimated.

Beginning in 2001, USEPA and CARB began issuing a series of regulations that require new diesel-powered vehicles and equipment to use the latest emissions control technology. This technology relies on two components. The first is a diesel particulate filter, which is capable of reducing particulate matter emissions by over 90% (required for new engines beginning in 2007). The second technology is selective catalytic reduction, which reduces emissions of nitrogen oxides by over 90% (required for new engines beginning in 2010). Diesel emissions from equipment equipped with this technology is referred to as NTDE. As a result of the advances in emission control technology, USEPA, CARB, and other government and industry stakeholders commissioned a series of studies called the Advanced Collaborative Emissions Study (ACES). ACES has been guided by an ACES Steering Committee consisting of representatives of HEI and the Coordinating Research Council (CRC: a nonprofit organization that directs engineering and environmental studies on the interaction between automotive or other mobility equipment and petroleum products), along with the U.S. Department of Energy, U.S. EPA, engine manufacturers, the petroleum industry, CARB, emission control manufacturers, the National Resources Defense Council, and others. The Health Effects Institute (HEI), funded in part by USEPA, was selected to oversee Phase 3 of ACES.

Phase 3 of ACES evaluated whether emissions from new technology diesel engines cause cancer or other health effects. Specifically, it evaluated the health impacts of a 2007-compliant engine equipped with a diesel particulate filter. HEI found that lifetime exposure to new technology diesel exhaust (NTDE) did not cause carcinogenic lung tumors. The study also confirmed that the concentrations of particulate matter and toxic air pollutants emitted from NTDE are more than 90% lower than emissions from traditional older diesel engine.

As a result of the very low emissions from new technology diesel engines and the research conducted by HEI, it is projected that the project would not result in any new cancer risks from the project's diesel emissions. Therefore, the project would have a less than significant health risk impact.

As discussed above, there are no significant health risk impacts associated with the project. However, under a very conservative application of the "Current OEHHA Guidance" to the proposed project (which was provided for informational purposes), three homes within the Specific Plan area could be identified as having a health risk in excess of the SCAQMD threshold. Although air quality significance thresholds have been established for outdoor environments, a significant portion of human exposure to air pollutants occurs indoors where people spend more than 90 percent of their time (USEPA 2011). One approach to reduce exposure is the installation of high efficiency panel filters inside the HVAC system. Air filters and other air-cleaning devices are designed to remove

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pollutants from indoor air. Some are installed in the ductwork of a home's central heating, ventilating, and air-conditioning (HVAC) system to clean the air in the entire house. In studies of the effectiveness of air filtration systems in classrooms (SCAQMD 2009) and by the EPA in residences (USEPA 2009b), the combination of an HVAC system with a high performance panel filter reduced indoor levels of fine particulate matter, PM_{2.5} and smaller particles by 70 to 90 percent.

The use of a filtration system consisting of the application of filters with a rating of ASHRAE Standard 52.2 MERV-13 is sufficient to capture a significant portion of the diesel particulate matter. However, the filtration system would not remove the smallest of particles (less than approximately 0.01 to 0.2 micron in diameter). MERV-13 filters would, however, reduce particles in the range of 0.3 to 1 micron by up to 75 percent and particles larger than 1 micron by 90 percent (see Table 1 of the Addendum to CARB 2012). Based on measurement studies of the size distribution of the collected DPM, approximately 0.1 to 10 percent of the total DPM mass includes particles between 0.01 and 0.2 micrometer in diameter, particles between 0.3 and 1 micrometer in diameter comprise 70 percent of the total DPM mass, and particles above 1 micrometer comprise 5 to 20 percent of the total DPM mass (DieselNet.com 2002).

Since the cancer risk from DPM is calculated from the mass of DPM emitted, the quantity of DPM reduced by the action of air filters would thus equate to a reduction in cancer risk. The application of MERV-13 air filter filtration system would result in a reduction of DPM exposures by approximately 70 percent.

DPM Size: 0.01 to 0.2 micrometers 0.3 to 1 micrometers Greater than 1 micrometer

(10% total mass × 0% reduction + 70% total mass × 75% reduction + 20% total mass × 90% reduction)

Attributing an adjustment for time that windows might be open, residents would be outside, or for different compounds that result in the cancer risk would reduce the efficacy of the filters by about 20 percent, bringing the total cancer risk reduction from the filters to 50 percent.

Absent the results of the HEI study, installation of air filters meeting the requirements discussed above on the three identified homes within the WLCSP area would reduce the OEHHA-calculated risk to below 10 in one million. The use of the filters would bring the OEHHA-calculated risk below the SCAQMD threshold eliminating any possible risk from the project on those three homes within the Specific Plan area. However, based upon the results of the HEI study, health risk impacts are less than significant and no further mitigation is required.

In summary, the implementation of all the recommended mitigation measures, including the requirement to use 2010 diesel engine emissions standards and Tier 4 construction equipment, will reduce the OEHHA-calculated cancer risk to below 10 in one million on all but three existing residences within the WLCSP boundary. However, the HEI study indicates the use of 2010 diesel engines and TIER 4 equipment will eliminate the project cancer risk, therefore, there will be no impacts to the three homes and no mitigation is required.

Finally, note further that after application of mitigation, the cancer risk burden is estimated at 0.10 based on the "Current OEHHA Guidance" which is less than the SCAQMD cancer burden significance threshold of 0.5, based on the assumption that diesel exhaust can cause cancer. Therefore, the project would not exceed the SCAQMD's cancer burden significance threshold.

As requested in comments received during the DEIR comment period, an analysis was conducted to compare cancer risks for a design buffer area of 250 feet from the project boundaries (this is the current project design) to a buffer area of 1,000 feet from the property boundary based on the "Current OEHHA Guidance." As shown in Table 4.3.AG, the results for the maximum incremental

cancer risk are nearly identical for the 250-foot buffer and the 1,000-foot buffer. The 1,000-foot buffer would not appreciably reduce air quality impacts. More importantly, as result of revised mitigation measures such as 4.3.6.2.A that commits to cleaner construction equipment, there is no significant health impact outside the project boundaries for residents, workers, or other sensitive receptors that would be affected by an increased buffer area. That analysis assumes that traditional diesel equipment would be used as opposed to new technology diesel (which does not contribute to cancer

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Table 4.3.AG: Estimated Cancer Risks, 70-year Exposure Duration for Sensitive/Residential Receptors, With Mitigation

Receptor Location	Incremental Cancer Risk ⁽¹⁾ (risk/million)		SCAQMD Cancer Risk Significance Threshold (risk/million)	Exceeds Threshold?
	250-Foot Buffer	1000-Foot Buffer		
Maximum risk anywhere in the modeling domain ⁽²⁾	17.0	16.5	10	Yes
Maximum risk at existing residences within the project boundaries	17.0	16.5	10	Yes
Maximum risk at any existing residential area outside of the project boundaries ⁽³⁾	4.3	3.9	10	No
Maximum risk at any undeveloped residentially zoned property outside of the project boundaries ⁽⁴⁾	4.0	3.7	10	No

Notes:

⁽¹⁾ 30-year average exposures from 2015 to 2044 (includes diesel PM emissions from construction and operation)

⁽²⁾ Location is at the existing residences within the boundaries of the project

⁽³⁾ Location is at the southwest corner of the project along Bay Avenue

⁽⁴⁾ Location is at an undeveloped property zoned for residential at the southwest corner of the project
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015.*

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risk), as required by project mitigation measures. As shown in Figure 4.3.20, the locations of the 10 in one million cancer risk contour line for the project design and the 1,000 foot buffer under the “Current OEHHA Guidance” exposure duration are coincident and overlap each other.

Risk in Perspective. To better understand cancer risk, even though new technology diesel exhaust does not cause cancer according to the HEI study, it helps to understand risk in other contexts. For instance, SCAQMD estimates that the risk of developing cancer from all sources of air pollution in Southern California is approximately 367 in one million. According to the National Cancer Institute, Americans face an overall risk of developing cancer from all causes of 408,000 in one million. Figure 4.3.21 presents the project risk in perspective with other lifetime risks in the United States based on mortality statistics. As shown in the figure, the project cancer risk (the risk of developing cancer, not dying of cancer) has a slightly higher risk than dying from a lightning strike and lower risk than accidental drowning.

4.3.7 Cumulative Impacts

4.3.7.1 Short-Term Air Quality Impacts

The cumulative area for air quality impacts is the Basin. It is generally accepted that if a project exceeds the regional threshold for a nonattainment pollutant, then it would result in a cumulatively considerable net increase of that pollutant and result in a significant cumulative impact. The Basin is currently in nonattainment for ozone, PM₁₀ and PM_{2.5}. The implementation of the project would contribute criteria pollutants to the area during project construction. A number of individual projects in the area may be under construction simultaneously with the proposed project. Depending on construction schedules and actual implementation of projects in the area, generation of fugitive dust and pollutant emissions during construction would result in substantial short-term increases in air pollutants. Each project would be required to comply with the SCAQMD’s standard construction measures; however, despite adherence to SCAQMD’s standard construction measures and **Mitigation Measures 4.3.6.2A** through **4.3.6.2D** identified previously, project-related emissions would still exceed applicable SCAQMD regional thresholds for VOC, NO_x, and CO. Therefore, cumulative impacts associated with short-term air quality impacts would be significant and unavoidable.

4.3.7.2 CO Hot Spot Impacts

As identified in Section 4.3.5.2, no significant CO hot spot impacts would occur. It is anticipated that CO emissions in the future will decrease with advances in technology. As previously identified, background concentrations in future years are anticipated to continue to decrease as the concerted effort to improve regional air quality progresses. Therefore, CO concentrations in the future years would generally be lower than existing conditions. Based on the analysis, because no CO hot spot impacts would occur, it is reasonable to assume that a less than significant cumulative CO impact would occur.

4.3.7.3 Long-Term Regional Air Quality Impacts

As previously identified in Tables , 4.3.AA and 4.3.AB, the long-term operation and the combined construction and operational emissions of the project would contribute to long-term regional air pollutants despite implementation of mitigation measures. The Basin is in nonattainment for ozone, PM₁₀ and PM_{2.5} at the present time; therefore, the operation of the proposed project would exacerbate nonattainment of air quality standards within the Basin and contribute to adverse cumulative air quality impacts. Implementation of the proposed project would unavoidably contribute to significant long-term cumulative air quality impacts.

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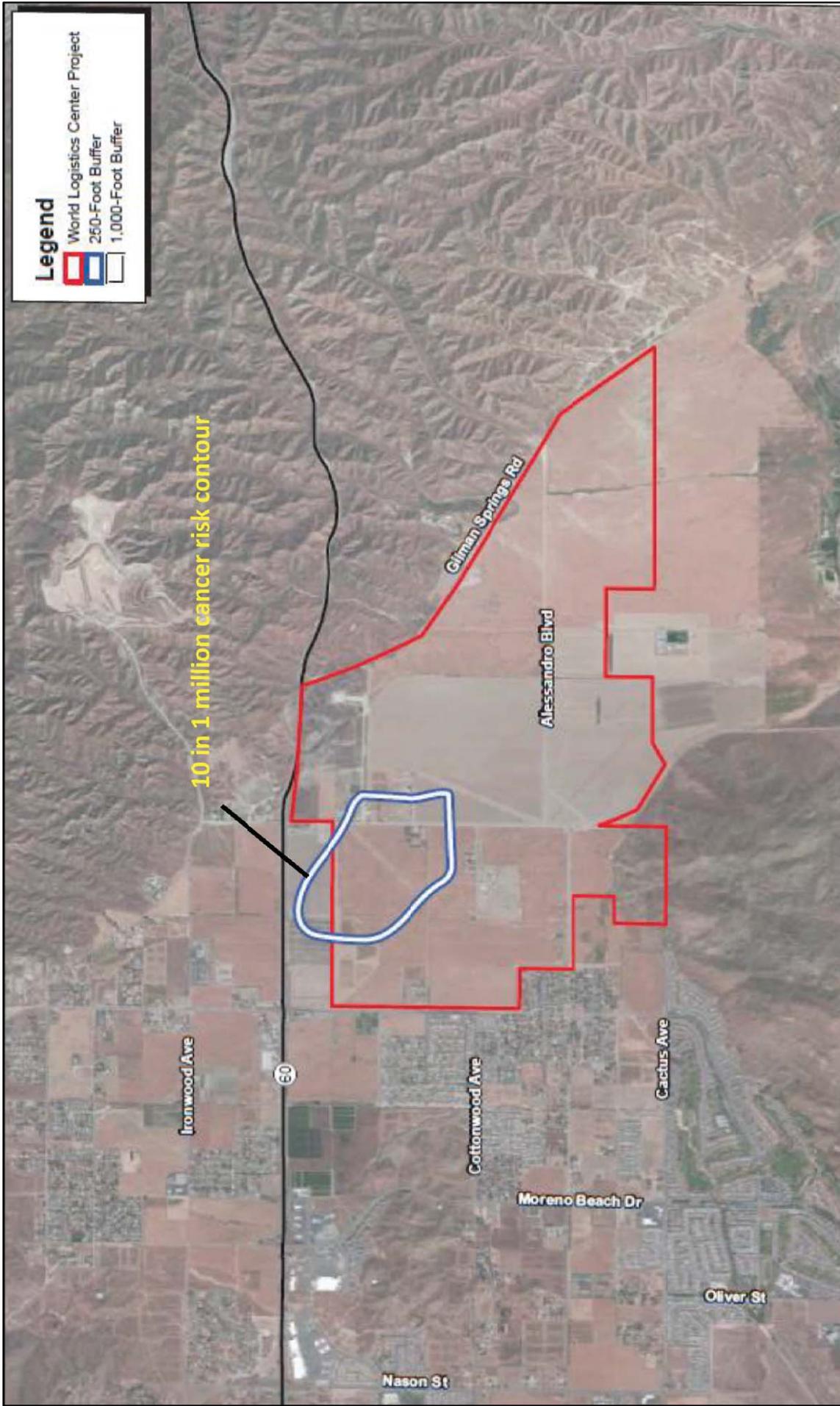


FIGURE 4.3.20

World Logistics Center Specific Plan Project
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250-foot vs 1,000-foot Buffer Analysis "Current OEHHA 30-Year Guidance"
With Mitigation Close-In View

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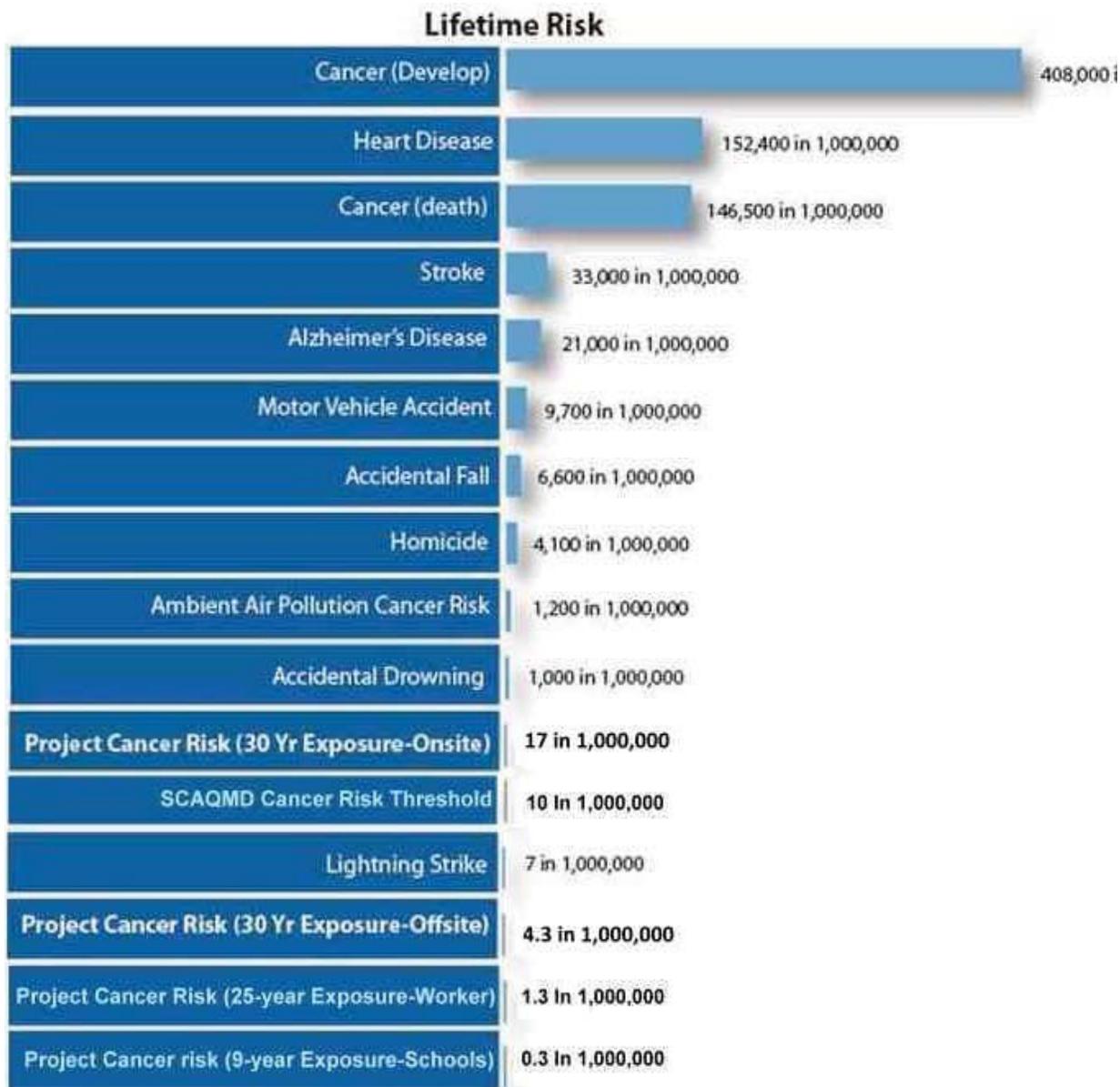


Figure 4.3.21: Lifetime Risk Comparison

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4.3.7.4 Cumulative Health Risk Impacts

Cancer Risks to Sensitive Receptors and Cancer Burden. SCAQMD recommends that any given project’s potential contribution to cumulative cancer risk impacts should be assessed using the same significance criteria as for project-specific impacts. Therefore, a project that has the potential to exceed any significance threshold on its own would also result in a cumulatively considerable significant impact. As noted from the results shown in previously discussed in Impact 4.3.6.5 in the subsection *Cancer Risks*, since the project would implement mitigation measures resulting in the cleanest on-road and off-road diesel equipment and such equipment has been shown through extensive health effects studies to not result in cancer. Therefore, the project would not result in a cumulatively considerable impact.

Non-Cancer Acute and Chronic Hazards Impacts. As previously identified, the maximum non-cancer chronic hazard index and acute non-cancer hazard index from the operation of the project are estimated to be less than 0.13 and 0.06, respectively. These values are less than the SCAQMD’s significance threshold of 1.0. Therefore, the project would also have a less than significant cumulative non-cancer hazard impact.

Summary of Project-Related Air Quality Impacts

Based on the preceding analyses in Sections 4.3.5.1 through 4.3.6.5, the WLC project will have the following direct and cumulative air quality impacts:

Table 4.3.AH: Summary of Project-Related Air Quality Impacts (new table)

Impact	Air Quality Topic/Issue	Impact Conclusion
Project Impacts		
4.3.5.1	Odors	Less than Significant No Mitigation Required
4.3.5.2	Long-Term Micro-Scale CO Hotspot Emissions	Less than Significant No Mitigation Required
4.3.6.1	Air Quality Management Plan Consistency	Significant (inconsistent) and Unavoidable with Mitigation
4.3.6.2	Regional Construction Emissions	Significant and Unavoidable with Mitigation (VOC, NOx, CO, and PM ₁₀ ; regional health effects from ozone)
4.3.6.3	Localized Construction and Operation (LSTs)	Significant and Unavoidable with Mitigation (onsite) Less than Significant with Mitigation (offsite)
4.3.6.4	Regional Long-Term Operational Emissions	Significant and Unavoidable with Mitigation (VOC, NOx, CO, PM ₁₀ , and PM _{2.5} ; regional health effects from ozone, PM ₁₀ , and PM _{2.5})
4.3.6.5	Sensitive Receptors (a) Localized PM ₁₀	Significant and Unavoidable for PM ₁₀ with Mitigation (onsite) Less than Significant with Mitigation (offsite)
	(b) Non-Cancer Acute and Chronic Health Risks	Less than Significant
	(c) Cancer Risks– Sensitive Receptors	Less than Significant with Mitigation
	(d) Cancer Burden	Less than Significant with Mitigation
	(e) Cancer Risks –Workers	Less than Significant with Mitigation
	(f) Cancer Risks – School Sites	Less than Significant
Cumulative Impacts		
4.3.7.1	Cumulative Short-Term Air Quality Impacts	Significant and Unavoidable

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Table 4.3.AH: Summary of Project-Related Air Quality Impacts (new table)

Impact	Air Quality Topic/Issue	Impact Conclusion
4.3.7.2	Cumulative CO Hot Spots	Less than Significant
4.3.7.3	Cumulative Long-Term Regional Impacts	Significant and Unavoidable
4.3.7.4	Cumulative Health Risk Impacts (a) Cancer Risks and Cancer Burden to Sensitive Receptors (b) Cancer Risks – Worker Exposure (c) Non-Cancer Acute and Chronic Impacts	Less than Significant with Mitigation Less than Significant with Mitigation Less than Significant

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NOTE TO READERS. *The following revisions have been made due to changes in the proposed WLC project, responses to comments on the Programmatic DEIR and revisions and updates to the project biological resources assessment.*

4.4 BIOLOGICAL RESOURCES

Changes from December 2012 Biological Resource Analysis

- *At the request of Metropolitan Water District of Southern California (Letter C-2) information about the Inland Feeder was added to the Section 4.4.1.*
- *Additional details about existing setting Section 4.4.1 were added in response to the revised survey area and comments made on the DEIR. The format of this section was revised to follow the format and organization that was used in the revised MSHCP report. However, the information is conceptually the same.*
- *Table 4.4.A: Summary of Vegetation was updated based on the revised MSHCP report and moved to Section 4.4.1.4.*
- *Table 4.4.B was divided into two separate tables based on the updated biological resources report in addition to comments regarding the presence of sensitive plants and wildlife in the area.*
- *Additional discussion of burrowing owl was added to Sections 4.4.1.13 and 4.4.1.14 due to a burrowing owl being identified within the project site during the 2013 focus survey.*
- *Table 4.4.D Special Interest Species was incorporated into Tables 4.4.B Sensitive Plant Species in the WLC Project Area and 4.4.C Sensitive Wildlife Species in the WLC Project Area.*
- *The discussion of riparian habitat and potential wildlife species was expanded in section 4.4.1.14 due to the updated MSHCP report.*
- *Detailed information about on-site drainages has been excerpted from the Jurisdictional Delineation Report and added to Section 4.4.1.19. A discussion of on-site drainages was also added to Section 4.4.6.3.*
- *The updated MSHCP report determined that Section 4.4.5.1 Jurisdictional Waters/Wetlands required mitigation to be less than significant. This section was added to 4.4.6.3 Jurisdictional Delineation, Riparian Habitat or Other Sensitive natural Communities. The existing mitigation was revised to mitigate potential jurisdictional impacts to less than significant levels.*
- *All mitigation measures in Section 4.4.6 were updated based on the revised the MSHCP report.*
- *In response to a comment made on the DEIR a nitrogen deposition section of added to section 4.4.6.2.*
- *Mitigation Measures 4.4.6.1A through 4.4.6.1C were revised based on comments from the U.S. Fish and Wildlife Service.*
- *Additional discussion of burrowing owl impacts was added to Section 4.4.6.4 due to the burrowing owl being identified within the project site during the 2013 focus survey. Burrowing Owl mitigation was also expanded.*

This section discusses the potential impacts of development of the proposed project on biological resources. In 2012, Michael Brandman Associates (MBA) conducted a Habitat Assessment, Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis, Habitat Acquisition and Negotiation Strategy (HANS) Report, and California Environmental Quality Act (CEQA) Biological

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Resources Assessment to comply with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) requirements. The 2012 MBA report summarized the results of several focused surveys conducted since 2004 on the WLC property. In 2014, the various WLC project studies were updated to reflect the most current information about the project area. Information to evaluate and analyze the proposed project's impacts to biological resources is derived from the following references and studies included in Appendix E:

- *Habitat Assessment, MSHCP Consistency, and HANS Report*, MBA, original dated December 20, 2012, revised September 2014. (This includes the focused surveys included as separate documents in the previous version.)
- *Jurisdictional Delineation of the World Logistics Center*, MBA, original dated October 29, 2012, revised dated December 19, 2013.
- *Determination of Biologically Equivalent or Superior Preservation (DBESP)*, MBA, December 5, 2013, revised September 2014.

In addition, the analysis contained in this section is based on the following reference documents:

- *Conservation Element*, City of Moreno Valley General Plan, adopted in July 2006.
- Western Riverside County MSHCP, adopted October 2003.
- MSHCP Final EIR, certified October 2003.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (this project September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The MBA report included an assessment of the WLC Specific Plan (WLCSP) site (2,610 acres), the 910-acre CDFW Conservation Buffer Area within the San Jacinto Wildlife Area (SJWA), the SDG&E Moreno Compressor Plant (194 acres), an “indirect impact zone” surrounding portions of the WLCSP property (502 acres), potential offsite infrastructure facilities (304 acres) and modified survey areas to match the reduced project area of the specific plan. In this section, the combined areas described in this paragraph total 5,972 acres and are hereafter referred to in this section as the survey area.

The information presented in this section is based on surveys of various portions of the project site conducted by MBA from 2005 to 2013 as referenced above. Development is only proposed on the Specific Plan property; the CDFW and public facilities property are not proposed for development and are expected to remain in their present condition. The habitat assessment information summarized in this section was collected during several site visits to the project area, the CDFW buffer area, the public facilities property, and the off-site improvement area at various times from 2005 to 2013.

The entire project area is regulated by the MSHCP, which is a regional conservation plan adopted by Riverside County in 2003. The MSHCP establishes core areas identifying important land that supports listed or sensitive species. The MSHCP also establishes criteria cells for land with important resources that need to be protected as part of the overall plan. The MSHCP identifies these critical lands for preservation or for relatively passive open space and utility uses. The MSHCP serves as a regional habitat conservation plan. The MSHCP was created, studied, and adopted by the County, the U.S. Fish and Wildlife Service (USFWS), CDFW, and fourteen cities in Riverside County along with the County. A more complete discussion of the MSHCP is provided in Section 4.4.1.6.

4.4.1 Existing Setting

The project area is located on the fringe of the urbanized development area of the City of Moreno Valley. The majority of the project area has been used for agricultural purposes for decades. Various portions of the area contain structures associated with previous agricultural activities, including residential structures, farm buildings, concrete pads, and fences. There are two small portions of relatively undisturbed vegetation on site, one in the northeastern portion of the site on land owned by Metropolitan Water District, and the second in the southwestern portion of the site in the rocky hills south of Alessandro Road and west of Theodore Street. Many of the off-site facilities such as water and sewer lines and access to potential water reservoirs are proposed along existing rights-of-way in the City of Moreno Valley. Debris basins are proposed along the eastern side of Gilman Springs Road to prevent debris and sediment from the Badlands from disrupting traffic on Gilman Springs Road after significant storm events. The CDFW Conservation Buffer Area south of the Specific Plan area is similar in history and conditions to the project site. The 1,104-acre area has been plowed for decades and portions of it are being actively farmed. The southwestern portion of the Conservation Buffer contains areas of non-native grasslands, although aerial photographs show that the area has been intermittently tilled over last 80 years.

Note: The following information was added at the request of the Metropolitan Water District of Southern California (Letter C-2) regarding the Inland Feeder. A figure showing the location of the Inland Feeder can be found at the end of comment Letter C-2 from the Metropolitan Water District of Southern California.

“Metropolitan owns property and owns and operates facilities on and adjacent to the site of the proposed project. As shown on the attached map, Metropolitan's irregularly shaped fee-owned property (APN 422-040-009 and 422-040-015), Inland Feeder Tunnel, and appurtenant tunnel access structure are located within the proposed specific plan area. In addition, Metropolitan's 145-inch-inside-diameter Inland Feeder pipeline and appurtenant structures extend through the specific plan area in the street rights-of-way for Eucalyptus Avenue, Theodore Street, and Davis Road. Metropolitan also has a 110-foot-wide easement along Davis Road.”

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4.4.1.1 Topography and Soils

The project area is located in Rancho Belago, in the eastern portion of the City of Moreno Valley, in western Riverside County. The site is generally located south of SR-60, east of Redlands Boulevard, west of Gilman Springs Road, and north of the San Jacinto Wildlife Area (SJWA). The project site gently slopes down from north to south, and contains 15 identifiable drainages, as outlined in the jurisdictional delineation.¹

The soils in the project area have been mapped by the *Soil Survey of Western Riverside Area, California* (1971)² and include San Emigdio loam (SgA and SgC) and San Emigdio fine sandy loam (SeC2), with smaller inclusions of Arbuckle loam (AkC), Badland (BaG), Gorgonio loamy sand (GhC), Greenfield sandy loam (GyA, GyC2, GyD2), Hanford coarse sandy loam (HcC and HcD2), Metz loamy sand (MdC and MeD), Metz loamy fine sand (MfA), Metz gravelly sandy loam (MID), Ramona sandy loam (RdD2), Rockland (RtF), San Emigdio fine sandy loam (SeA and SeD2), and San Timoteo loam (SmE2).

The observed surface soils in the area contain evidence of heavy repeated disturbance from agriculture-related activities. None of the soils present in the project area is considered sensitive pursuant to the MSHCP, which includes all of Moreno Valley (i.e., the City is a signatory to the MSHCP).

4.4.1.2 Land Uses

Agricultural fields including dry-land grain farming dominate the project area. Some rural residences are located in the central portion of the area along Theodore Street, and areas of open space are located throughout the southern and northeastern portions of the site. General land uses around the project area include suburban residential development to the west, vacant land and scattered rural residences to the north and east (across SR-60 and Gilman Springs Road, respectively), the SJWA and natural gas distribution facilities to the south, and the Lake Perris State Recreation Area (LPSRA) to the southwest.

4.4.1.3 Vegetation, General

The following data on vegetation in the study area are from the City's *General Plan Final Program EIR*³ and the *MSHCP Consistency Analysis Report*⁴ for the project area. The following describes the vegetation within various WLC project areas, including the Specific Plan, Offsite Improvement Area, CDFW Conservation Buffer, Indirect Impact Zone, and Additional Survey Areas. Table 4.4.A provides a numerical summary of the various types of vegetation within the WLC planning area.

Note: Table 4.4.A: Summary of Vegetation with the WLC Study Area has been removed in its entirety. To see original table please refer to FEIR Volume IV Section 4.4.1.3, Table 4.4.A.

Note: The following changes are the result of modifications to the WLCSP project area and updates to the various biological technical studies, and in response to a number of comments recommending the biological site surveys be updated. In addition, some paragraphs in this section were moved and only new information is shown in double underline.

¹ *Jurisdictional Delineation of the World Logistics Center*, Michael Brandman Associates, December 19, 2013.

² *Soil Survey of Western Riverside Area, California*, United States Department of Agriculture, November 1971.

³ *City of Moreno Valley Final Program EIR Conservation Element*, City of Moreno Valley, October 2006.

⁴ *Habitat Assessment, MSHCP Consistency Analysis, and HANS report*, Michael Brandman Associates, September 2014.

4.4.1.4 Vegetation (MBA Project Survey Area)

There are eleven (11) plant communities/vegetation types that occur within the MBA project survey area: extensive agriculture (e.g., dry-land farming), non-native grassland, urban/developed, disturbed, Riversidean sage scrub, mule fat scrub, non-vegetated channel, open water, ornamental, southern willow scrub, and northern mixed chaparral (see Figure 4.4.1). Figure 4.4.2 depicts the location of drainage features and Riparian/Riverine areas. The following acreages are for approximately 5,972 acres including the WLCSP (2,610 acres) plus off-site improvements and the existing Highland Fairview Corporate Park (Skechers) property, which was included in some of the historical vegetation surveys for this area. The vegetation of the CDFW/public facilities lands and the Off-site Analysis Zone are addressed following the information on the Project Area (i.e., areas of proposed or existing development).

Almost all (5,815 acres or 97.4 percent) of the MBA survey area (5,972 acres) is disturbed by human activity,¹ mainly dryland farming, with only 157 acres or 2.6 percent consisting of native plant communities. The nature and extent of the existing plant communities are discussed below in the order of their presence on the property.

a. Extensive Agriculture

This disturbed plant association covers 3,434.0 acres or 57.5 percent of the MBA survey area, and includes areas where vegetative cover comprises less than 10 percent of the surface area and where there is evidence of intense soil surface disturbance associated with agricultural uses. This community is generally dominated by winter wheat (*Triticum aestivum*), but also has small inclusions of non-native vegetation along the margins of the fields. Non-native vegetation within disturbed land will have a high predominance of invasive or weedy species that are indicators of heavy, soil disturbance, such as horse nettle (*Solanum elaeagnifolium*), bindweed (*Convolvulus arvensis*), and short-pod mustard (*Hirschfeldia incana*).

The extensive agriculture community in the project area also contains various interstitial ditches that are excluded from regular heavy-agricultural equipment disturbances, such as disking. These areas are less frequently disturbed and contain larger, more established, ruderal vegetation, such as tree tobacco (*Nicotiana glauca*) and tree of heaven (*Ailanthus altissima*), in addition to the fast-growing Russian thistle (*Salsola tragus*), telegraph weed (*Heterotheca grandiflora*), lamb's quarters (*Chenopodium album*), sow thistle (*Sonchus oleraceus*), and short-pod mustard. The interstitial ditch areas do not occupy enough area nor are continuous enough to constitute a separate plant community and are therefore considered part of the extensive agricultural plant community. The majority of the project area is occupied by extensive agriculture and recently disked or heavily grazed, such as in the pasturelands in the northwestern portion of the project area. Most of these areas are disked at least once each year and planted with winter wheat.

b. Non-Native Grassland

Non-native grassland is characterized by a dense to sparse cover of non-native annual grasses often associated with numerous weedy species and native annual forbs (wildflowers), especially in years with plentiful rain. Seed germination occurs with the onset of winter rains. Some plant growth occurs in winter, but most growth and flowering occurs in the spring. Plants then die in the summer, and persist as seeds in the uppermost layers of soil until the next rainy season. Dominant plants include brome (*Bromus* spp.), wild oat (*Avena* spp.), Jimson weed (*Datura stramonium*), and common sunflower. Non-native grassland occupies 1,729.0 acres or 29.0 percent of the MBA survey area, mainly in the Badlands area east of Gilman Springs Road and the southern portion as part of the CDFW Conservation Buffer land.

¹ Includes agriculture, non-native grassland, urban/developed, disturbed, and ornamental categories.

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Table 4.4.A: Summary of Vegetation within the WLC Study Area

Vegetation Community	WLCSP	Off-site Improvements	CDFW Conservation Buffer	SDG&E Moreno Compressor Station	Indirect Impact Zone	Additional Survey Areas	Totals
Extensive Agriculture	2,193	71	732	166	105	167	3,434
Non-Native Grassland	219	110	151	0	349	900	1,729
Urban/Developed	92	100	1	14	5	280	492
Disturbed	48	17	9	11	19	46	150
Riversidean Sage Scrub	48	0	11	0	21	17	97
Mule Fat Scrub	5	4	0	0	2	30	41
Southern Willow Scrub	1	0	6	0	0	7	14
Non-Vegetated Channel	0	2	0	0	1	4	7
Ornamental	3	0	0	3	0	0	6
Open Water	0	0	0	0	0	1	1
Northern Mixed Chaparral	1	0	0	0	0	0	1
Totals	2,610.0*	304.0*	910.0*	194.0*	502.0*	1,452.0*	5972.0*

Note:

* Rounded to the nearest whole number.

Source: Habitat Assessment, MSHCP Consistency Analysis, and HANS report, Michael Brandman Associates, September 2014.

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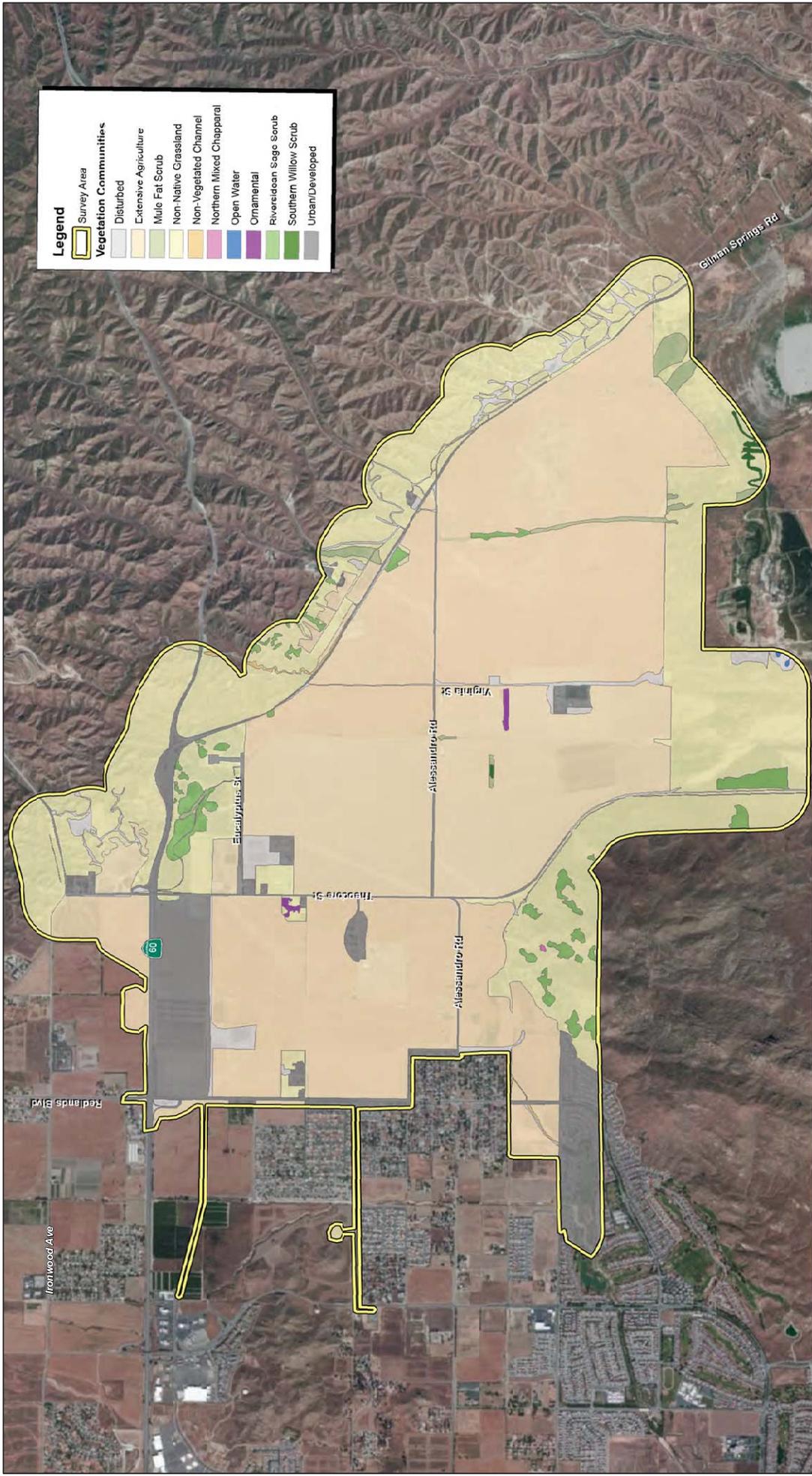
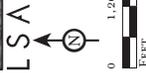


FIGURE 4.4.1

World Logistics Center Specific Plan Project
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 Onsite Vegetation Communities



SOURCE: Michael Brundman Associates, 11/2013
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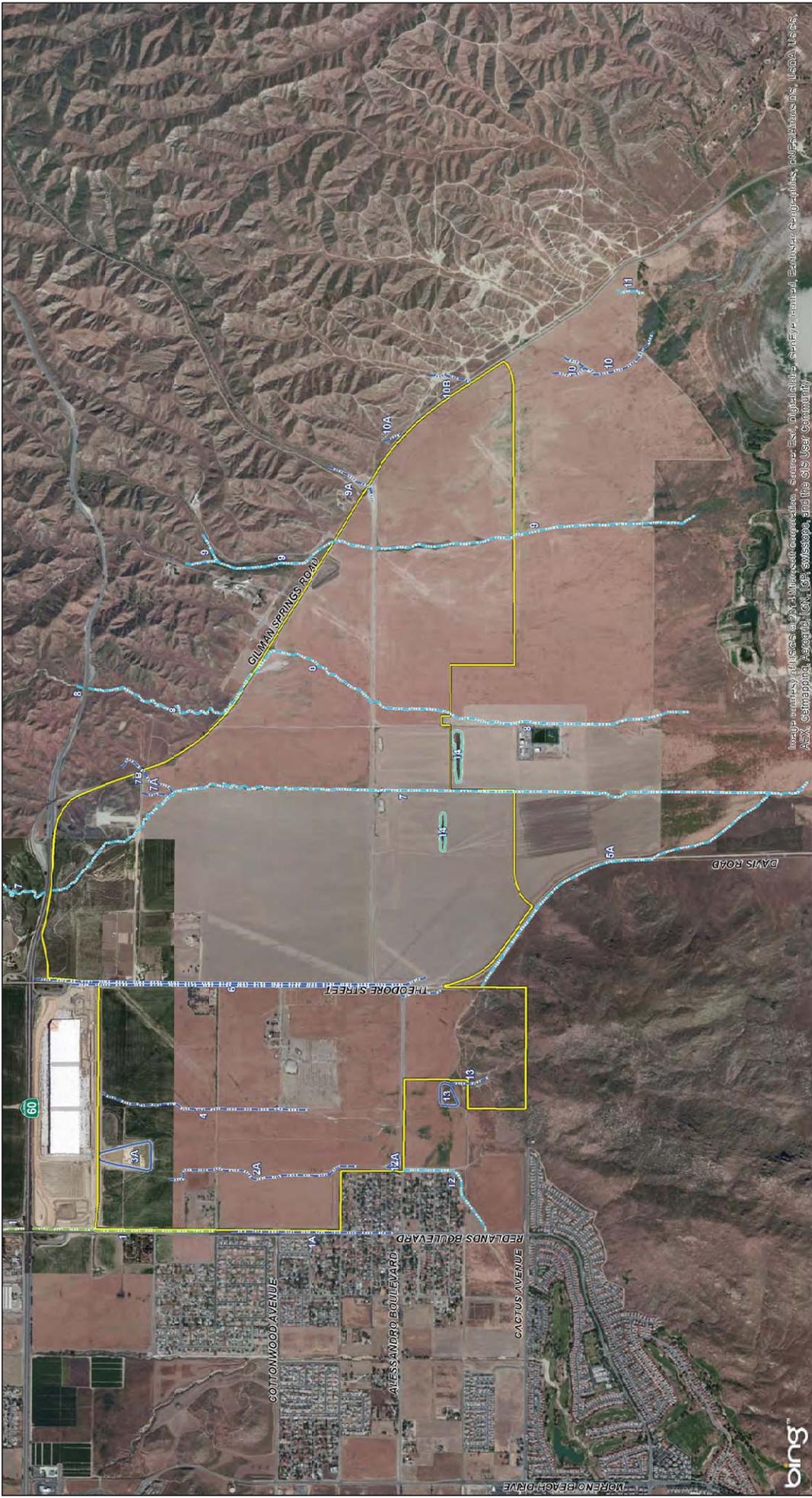


FIGURE 4.4.2

Project Boundary
 CDFW/USACE Non-Jurisdictional Detention Basin, RWQCB Jurisdictional Detention Basin
 CDFW/USACE Non-Jurisdictional Detention Basin
 CDFW Jurisdictional Streambed, USACE/RWQCB Jurisdictional Waters of the U.S.
 CDFW/USACE Non-Jurisdictional Waters
 CDFW Non-Jurisdictional Waters, USACE/RWQCB Jurisdictional Waters of the U.S.

SOURCE: County of Riverside, 2011; ESRI World Imagery & Bing Imagery, 2010; Delineation of Jurisdictional Waters and Wetlands, 2012.
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c. Urban/Developed

The urban/developed area includes any form of human disturbance associated with the development of rural residences that has resulted in permanent impacts to natural communities. This land use type comprises approximately 492.0 acres or 8.2 percent of the MBA survey area. By definition, urban/developed areas include roads, buildings and structures, pavement, concrete, landscape vegetation, and windrow vegetation. The isolated occurrences of the urban/developed community occur throughout the study area. The urban/developed area is not associated with any native vegetation and provides only limited habitat value, primarily as cover, nesting, and perching opportunities for birds and common terrestrial wildlife that have adapted to urban, agricultural, or other disturbed areas associated with human activity. The largest area of Urban/Developed land occurs in the northwestern corner of the survey area and is associated with the existing Skechers building.

d. Disturbed Areas

These areas support sparse ruderal vegetation and an occasional scattering of native plant species. This type of “habitat” is not a plant community and is considered to be of little or no value to wildlife. Disturbed areas include an area in the northern portion of the project site associated with the adjacent rural residences. These areas have been cleared of vegetation. The remaining disturbed areas are associated with dirt access roads and the area surrounding the existing natural gas compressor station. This category occupies 150 acres or 25 percent of the WLC site.

e. Riversidean Sage Scrub

Stands of Riversidean sage scrub (RSS) range from fairly open to dense with dominant species including brittlebush (*Encelia farinosa*), California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), California sagebrush (*Artemisia californica*), and coastal goldenbush (*Isocoma menziesii*). Other species observed include four-winged saltbush (*Atriplex canescens*), scalebroom (*Lepidospartum squamatum*), and California aster (*Lessingia filaginifolia*), in addition to non-native grasses such as ripgut brome (*Bromus diandrus*), slender oat (*Avena barbata*), red brome (*Bromus madritensis*), and non-native weedy species such as short-pod mustard. There are 97.0 acres (1.6%) of RSS located within the main drainage feature on the eastern side of the WLC project site (Drainage Feature 9, see Figure 4.4.2). The quality of the habitat on site can generally be considered moderate based on vegetation characteristics such as plant density, diversity of species, and level of disturbance. The stand within Drainage Feature 9 is of low quality due to high levels of disturbance, low density of native species, and sparse coverage. There are small patches of RSS in the northeastern and southwestern corners of the MBA survey area.

f. Mule Fat Scrub

Mule fat scrub is a widespread natural community throughout California and usually occurs below 2,000 feet. Mule fat scrub occupies approximately 41.0 acres or 07 percent of the MBA survey area within a portion of Drainage Feature 9 in the southeastern portion of the the WLC Specific Plan area and the CDFW Conservation Buffer lands. The mule fat scrub in the project area is generally characterized by dense stands of mule fat (*Baccharis salicifolia*) with various shrubs, weeds, and non-native grasses sparsely intermixed.

All areas of mule fat scrub within the drainage feature on the site are relatively undisturbed and contain little trash dumping, agricultural activities, or the presence of domesticated animals. The mule fat scrub plant community provides moderate quality habitat for a number of species. The dominant species observed within the mule fat scrub community were mule fat and tree tobacco. Other species observed include cheeseweed (*Malva parviflora*), wild radish (*Raphanus raphanistrum*), Russian thistle, common sunflower (*Helianthus annuus*), and short-pod mustard, in addition to non-native grasses such as ripgut brome, slender oat, and red brome. Drainage Feature 9 also contains scattered occurrences of scalebroom and four-winged saltbush.

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g. Southern Willow Scrub

The southern willow scrub community is characterized by dense, broad-leafed, winter deciduous riparian thickets of vegetation, and is dominated by several species of willow tree. Scattered emergent Fremont cottonwood (*Populus fremontii*) and California sycamore (*Platanus racemosa*) are most closely associated with this community. Most stands are too dense for understory development. This plant community is typically found on loose, sandy, or fine gravelly alluvium soils near stream channels during flood flows. It requires repeated flooding to prevent it from converting to a more mature Southern Cottonwood-Sycamore Riparian Forest community. The CDFW lists it as a sensitive plant community. Plant species identified within the community include sandbar willow (*Salix exigua*), black willow (*Salix goodingii*), mule fat, Fremont's cottonwood, Mexican fan palm (*Washingtonia robusta*), olive (*Olea europea*), phacelia (*Phacelia sp.*), and common sunflower.

There is a single patch of southern willow scrub that comprises approximately 0.9 acre within the central portion of the WLCSP. This community is composed of a single isolated stand within a human-made, catch basin that occurs south of Alessandro Boulevard and west of Virginia Street (see Figure 4.4.2). This stand was a direct result of nuisance flow and agricultural runoff from concrete cattle containment areas adjacent to the catch basin. This area no longer receives runoff from the previous cattle facility and habitat quality is progressively getting worse due to a lack of available moisture. Therefore, this patch of habitat is considered of low-habitat value. The remainder of the southern willow scrub habitat is either within additional survey area or within the CDFW Conservation Buffer.

h. Non-Vegetated Channel

The non-vegetated channel community occurs within the northeastern portion of the site (east of Gilman Springs Road) and the southwestern corner of the survey area, west of Theodore Street and south of Alessandro Road and accounts for 7 acres (0.1%) of habitat within the survey area. This habitat contains mainly cobbles and boulders along the channel bottom and banks. The substrate contains sparse sandy deposits with limited vegetative cover and therefore provides low quality habitat for sensitive plant and wildlife species.

i. Ornamental

This plant community occupies 6.0 acres or 0.1 percent of the MBA survey area. There are two distinct areas within the survey area that contain ornamental vegetation. The first area is located within rural residential development just west of Theodore Street and south of Eucalyptus Avenue. This portion of the survey area contains a stand of olive trees. The second area occurs within a human-made catch basin in the center of the WLCSP and is likely naturally occurring and likely began growing several decades ago. The area with this vegetation previously contained southern willow scrub, but has naturally converted to a dense stand of salt cedar. Wildlife that uses this area has adapted to urban, agricultural, or other disturbed areas associated with human activity. The other catch basin is discussed relative to the southern willow scrub community above. The ornamental area is not associated with any native vegetation and provides only limited habitat value, primarily as cover, nesting, and perching opportunities for birds.

An ornamental plant community is typically described as a large stand of non-native ornamental trees or shrubs. These areas are often artificially created, but can be naturally occurring. Plant species vary from project site to project site, but are generally non-native and are often associated with landscape plants.

There are two distinct areas within the survey area that contain ornamental vegetation. The first area is located within rural residential development just west of Theodore Street and south of Eucalyptus Avenue. This portion of the survey area contains a stand of olive trees. The second area occurs within

a human-made catch basin in the center of the WLCSP and is likely naturally occurring and likely began growing several decades ago.

The ornamental areas are not associated with any native vegetation and provides only limited habitat value, primarily as cover, nesting, and perching opportunities for birds and common terrestrial wildlife that have adapted to urban, agricultural, or other disturbed areas associated with development. This land use type comprises approximately six acres of the survey area.

j. Open Water

Open water is characterized by ponded or flowing water with little to no vegetative cover. These areas are specifically associated with freshwater drainage features and typically provide habitat for aquatic plant and wildlife species. There is a 1.0-acre area or less than 0.1 percent of open water located in the northern portion of the SJWA. The open water areas within the survey area are artificially created ponded areas.

k. Northern Mixed Chaparral

The northern mixed chaparral community is characterized by broad-leaved shrubs forming dense, often nearly impenetrable vegetation dominated by scrub oak (*Quercus dumosa*), chamise (*Adenostoma fasciculatum*), and any one of several species of manzanitas (*Arctostaphylos*) and lilacs (*Ceanothus*). Plants are typically deep-rooted and little or no understory vegetation is present. This vegetation community is adapted to repeated fires, to which many species respond by stump sprouting. A dense cover of annual herbs may appear during the first growing season after a fire, followed in subsequent years by perennial herbs, short-lived shrubs, and reestablishment of dominance by the original shrub species. There is 1.0 acre or less than 0.1 percent of northern mixed chaparral located on a north-facing slope of the hills at the southwestern corner of the project area.

4.4.1.5 Vegetation in the CDFW Conservation Buffer Area

Six plant communities/land use types occur within the 1,104-acre CDFW Conservation Buffer Area: extensive agriculture (e.g., dryland farming), non-native grassland, Riversidean sage scrub, disturbed, southern willow scrub, and urban/developed. The CDFW Conservation Buffer consists of the 910 acres of land that was placed into conservation in 2001 and the 194-acre SDG&E facility. The CDFW Conservation Buffer Area has been used for agricultural pursuits over many years, but there are a few isolated areas that have been left fallow and these have begun to return to non-native grassland and Riversidean sage scrub. See Table 4.4.A for a listing of plant associations in the CDFW Conservation Buffer Area.

4.4.1.6 Vegetation in the Indirect Impact Zone

Seven plant communities/land use types occur within the 1,636.6-acre off-site analysis zone. This area was evaluated as an additional 1,000-foot zone beyond the boundaries of the project area to consider potential off-site indirect impacts associated with noise, light, water quality, and air quality concerns beyond the boundary of the actual project area. Plant communities associated with the Indirect Impact Zone include non-native grassland, extensive agriculture, RSS, disturbed, urban/developed, mule fat scrub, and non-vegetated channel (see Figure 4.4.1). This area contains land that has been previously disturbed as a result of development and off-road vehicle trails east of Gilman Springs Road and general open space areas in the southwestern portion of the survey area.

4.4.1.7 Wildlife in the Specific Plan Area

Despite the disturbed nature of the WLC planning area (i.e., 97% non-native vegetation), common wildlife species that have adapted to human-modified landscapes are present and were observed on site, including the red-tailed hawk (*Buteo jamaicensis*), house finch (*Carpodacus mexicanus*), mourning dove (*Zenaidia macroura*), common raven (*Corvus corax*), coyote (*Canis latrans*), desert cottontail (*Sylvilagus audubonii*), and California ground squirrel (*Otospermophilus beecheyi*). A complete list of species observed on site is included in Appendix B of the *MSHCP Consistency Analysis* contained in Appendix E to this EIR. Utilization of agricultural areas by wildlife varies greatly depending upon the type of crop and the time of the year. Due to the amount of agricultural activities over the past decades, there is a limited number of species that are present although many species discussed above occur along the margins of the agricultural fields and along the limited drainage areas. In addition to the more common species discussed above, the San Diego gopher snake (*Pituophis cantenifer annectens*), white-tailed kite (*Elanus leucurus*), barn owl (*Tyto alba*), loggerhead shrike (*Lanius ludovicianus*), and Botta's pocket gopher (*Thomomys bottae*) were recorded to occur within the WLCSP and the off-site facility areas. There is a robust passerine bird population at the site during the growing season with a severely limited number of mammals following the harvest, largely due to the extensive disking activities.

4.4.1.8 Wildlife in the CDFW Conservation Buffer Area

The adjacent San Jacinto Wildlife Area (SJWA) has a very high diversity and abundance of bird species, and is recognized nationally and internationally for its bird population. The amount and diversity of birds in the SJWA contributes to a large degree to the number of different kinds of birds observed in the agricultural areas on the project site and within the CDFW Conservation Buffer Area. Numerous bird and mammal species occur within these agricultural areas and fallow fields may provide foraging opportunities for raptors. The number of passerine birds is high and includes both year-round species and transitory birds associated with the SJWA. The number of mammals is limited probably due to the extensive agricultural pursuits of the past.

4.4.1.9 Wildlife in the Off-site Analysis Indirect Impact Zone

MBA evaluated this area using direct observations, literature reviews, and information from studies performed on adjacent areas. The area adjacent to Gilman Springs Road on the south end of the planning area was examined by MBA biologists in 2007 (unpublished Burrowing Owl Survey Report, MBA). The distribution of wildlife species at this adjacent area was similar to the WLCSP and the CDFW Conservation Buffer Area, with a very limited distribution of mammals (primarily burrowing mammals) and a high incidence of passerine birds.

4.4.1.10 Wildlife in the SJWA and Mystic Lake

The SJWA is 20,000 acres of man-made wetlands and open water ponds and is the first state wildlife area to utilize reclaimed water to enhance its wetlands. It is located south of the project area and the CDFW Conservation Buffer Area. The SJWA contains several habitat areas, including wetlands, restored riparian habitat, grasslands, sage scrub, and marshes and provides habitat for the several threatened and endangered wildlife species including Stephens' kangaroo rat, Swainson's hawk, and bald eagle. The SJWA contains an important inland wetland, which provides habitat for many wetland plant species and wildlife species including aquatic birds, amphibians, and fish. According to the CDFW:

"The San Jacinto Wildlife Area public lands currently total about 20,000 acres. The Wildlife Area shares a common boundary with the 8,800-acre Lake Perris State Recreation Area. The majority of the Wildlife Area is located in unincorporated Riverside County. The northern

portion of the Wildlife Area is included within the city limits of Incorporated City of Moreno Valley. Davis Road, an unimproved dirt road, bisects the Wildlife Area in a north-south direction. This roadway is maintained by DFG on the north and the County of Riverside on the south. Surrounding land users are primarily involved in agriculture principally dry land wheat farming and dairy operations. The private lands immediately north of the Wildlife Area are currently farmed and are included within the City of Moreno Valley jurisdiction. The 150 acre Double Bar "S" Horse Ranch represents the only substantial in-holding within the current Wildlife Area boundary. To the east lies Mystic Lake bed, the most northern portion of which has recently been Incorporated into the Wildlife Area. The south eastern parts of the lake bed remain in private ownership and are used for agriculture when not inundated with flood waters from the San Jacinto River. Numerous privately owned hunt clubs (waterfowl and game bird hunting clubs) are also located on the current eastern boundary of the Wildlife Area. The unincorporated rural communities of Lakeview and Nuevo are located to the south. Much of the land on the immediate southern boundary of the Wildlife Area is currently farmed by the Amway Corporation Nutrilite Division."

The SJWA is a significant resource for avian species and other wildlife. In 1981–82, the State Wildlife Conservation Board initially purchased 15,000 acres of the Mystic Lake area as mitigation for habitat impacts associated with the construction of the State Water Project (SWP). This area was designated as the SJWA. In 1995, the Board acquired an additional 921 acres of upland farmland within the southern portion of the Moreno Highlands Specific Plan property to incorporate into the SJWA. In 2001, the Board acquired an additional 274 acres in this same area. This land was purchased to provide a buffer between the land surrounding Mystic Lake and the planned urban development within Moreno Valley. The Board action on this purchase indicated the land was to “facilitate restoration of historic water flows back into the lakebed and allow for reversion back to wetlands during wet years, and areas of low vegetation cover during dry years, all providing significant habitat for species using the SJWA, including a number of state and federally listed species.”¹

CDFW Conservation Buffer Area. The entirety of the State-owned land south of the project area is referred to as the SJWA. However, the land purchased out of the Moreno Highlands Specific Plan is referred to in this EIR as the CDFW Conservation Buffer Area to denote the reason for its original purchase. The 1,195 acres acquired by the Wildlife Board during the past twenty years was intended to serve as an effective buffer between the SJWA and the development expected to occur north of the SJWA area (the present mixed-use Moreno Highlands Specific Plan). Currently, this acreage provides not only a buffer area, but also provides open space for raptor and bird foraging habitat, and is actively farmed under CDFW contract. Approximately 909 acres of the land within the project area are identified as Conservation Area (total 1,085 acres) and are owned by the CDFW and support vegetation identified as “Extensive Agriculture” in Section 4.4.1.3, *Vegetation*. The proposed project will permanently designate this CDFW Conservation Buffer Area as Open Space under the City General Plan. It is anticipated the State would maintain its function as a buffer and also as foraging habitat for raptors as long as it is regularly tilled. There are no plans to alter the current agricultural activities on this property.

Mystic Lake. This is a large crescent-shaped, intermittent water body within the SJWA, which serves as a significant wetland habitat for numerous birds including migratory waterfowl such as ducks, grebes, and occasional geese. Seasonal upland game hunting is allowed within the SJWA and Lake Perris State Recreation Area. Other uses of the SJWA include wildlife observation, nature study, fishing, hiking, photography, field trials, hunting dog training classes, and conservation of wildlife and wildlife habitat. Bird species commonly found at various times of the year in the SJWA include a wide

¹ Wildlife Conservation Board minutes from May 18, 2001.

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variety of ducks, shore birds and gulls, upland game species, and a variety of passerine birds including those found in the project area and the CDFW Conservation Buffer area.

4.4.1.11 Sensitive Biological Resources

Special status species are plant and animal species or subspecies for which there is concern for population sustainability or that are otherwise considered worthy of consideration for protection by the CDFW, USFWS, local agencies, or special interest groups, such as the California Native Plant Society (CNPS). In addition to species federally or State listed as endangered or threatened, these include species that are Candidates or Proposed for listing as endangered or threatened, plant species that are State listed as Rare, animal species designated as Fully Protected or Species of Special Concern by the State of California, and plant species designated as California Rare Plant Rank (RPR) 1A, 1B, or 2. California Rare Plant Ranks are assigned by a committee of government agency and non-governmental botanical experts, including experts from CNPS, and are not official State designations of rarity status. Legal protection for sensitive species varies widely, from the comprehensive protection extended to federally listed threatened and/or endangered species to species without legal protection at the current time.

4.4.1.12 Western Riverside County Multiple Species Habitat Conservation Plan

The MSHCP for western Riverside County is an element of the Riverside County Integrated Project (RCIP), which is an integration of land use, transportation, and conservation planning and implementation to develop a consensus for the future development of Riverside County. The MSHCP is designed to protect over 150 species and conserve over 500,000 acres of land in western Riverside County. The MSHCP was conceived, developed, and is being implemented specifically to address the direct, indirect, cumulative, and growth-related effects on covered species resulting from build out of planned land use and infrastructure, including the proposed project.

The MSHCP involves efforts by the County, State, and Federal governments, the fourteen cities in western Riverside County, and private and public entities engaged in construction activities that potentially affect the species covered under the MSHCP. The plan specifies an obligation of local projects, both public and private, to mitigate their impacts on species. The MSHCP includes incentives for conservation or the purchase of properties from willing sellers and will eventually result in a Conservation Area in excess of 500,000 acres, focusing on conservation of 146 species. The MSHCP Conservation Area includes approximately 347,000 acres of existing Public/Quasi-Public Lands and approximately 153,000 acres of Additional Reserve Land.

The MSHCP Conservation Area¹ is made up of existing and proposed “Core” areas, or large assemblages of public land that contain important habitat and listed or sensitive species populations. The core areas are connected by a series of “linkages” or “corridors” identified across public and private lands to allow wildlife movement and genetic connectivity and diversity among the core areas. The MSHCP identifies conservation areas through a series of “criteria cells” within which certain biological resources (i.e., vegetation and/or physical features) should be preserved over the long term. The MSHCP also establishes various processes to evaluate land development proposals in light of its goals and requirements. The MSHCP also identifies when studies need to be performed within certain criteria cells to determine the presence or absence of listed or otherwise sensitive species of plants or animals.

The project site is located within the Reche Canyon/Badlands Area Plan of the MSHCP. Portions of the project area occur in 14 criteria cells of the MSHCP. Therefore, the project applicant, the City, and

¹ Not to be confused with the Conservation Area within the WLC planning area

the County¹ are required to use the Habitat Acquisition Negotiation Strategy (HANS) process established in the MSHCP to identify and acquire habitat as part of the development review process. The HANS process involves negotiations between a landowner and the Western Riverside County Regional Conservation Authority (RCA) so the County can acquire land with important habitat or other biological resources while providing fair compensation and/or reasonable development opportunities on the remaining land for the landowner.

The southern portion of the project area (910 acres owned by the CDFW) is the northern portion of the SJWA, which is classified as “Public Conserved Land” under the MSHCP. MSHCP Proposed Core 3 is located to the north and east of the project area, and Existing Core H is located to the south. Small portions of the project area fall within both Core Areas (see Figure 4.4.3). No existing or proposed linkage or constrained linkage areas are within or adjacent to the project area.

The 2013 MBA report focused on sensitive resources that could potentially occur in the overall planning area, including nine Criteria Area plant species, burrowing owl (*Athene cunicularia*), and Los Angeles pocket mouse (*Perognathus longimembris brevinasus*).

4.4.1.13 Endangered, Threatened, and Special Status Species

It is typical to base the presence or likelihood of presence of sensitive species within a specific area on the following criteria:

- Direct observation of the species or its sign in the project area or immediate vicinity during site-specific surveys or reported in previous biological studies;
- Sighting by other qualified observers;
- Record reported by the Natural Diversity Data Base (NDDB) published by the CDFW; and/or
- Presence or location of specific species lists provided by private groups (e.g., CNPS).

Threatened and Endangered Species. The USFWS and the CDFW list species as threatened or endangered under the Federal and California Endangered Species Acts (FESA and CESA, respectively). An endangered species is one that is in danger of extinction throughout all or a significant portion of its range. A threatened species is one that is likely to become endangered in the foreseeable future.

The USFWS may designate “critical habitat” that identifies specific areas, both occupied and unoccupied, that are often necessary to the conservation of a listed species. To make a determination of Critical Habitat, biologists consider physical and biological habitat features needed for life and successful reproduction of the species which include:

- Space for individual and population growth and for normal behavior;
- Cover or shelter;
- Food, water, air, light, minerals, or other nutritional or physiological requirements;
- Sites for breeding and rearing offspring; and
- Habitats that are protected from disturbances or are representative of the historic geographical and ecological distributions of a species.

¹ Western Riverside County Regional Conservation Authority (RCA)

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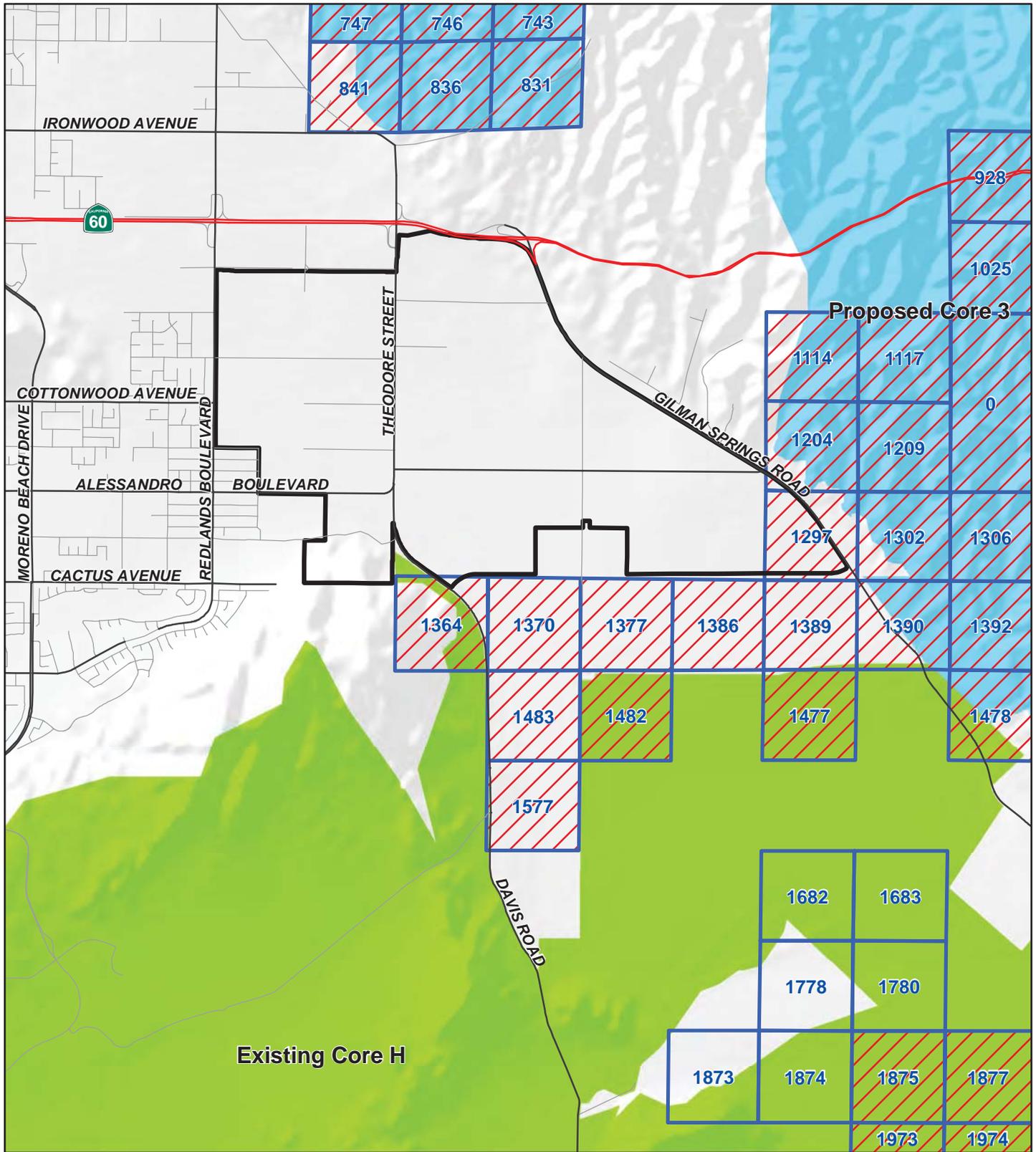
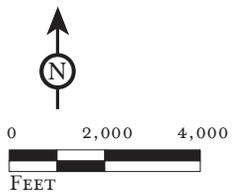


FIGURE 4.4.3

LSA



- Project Boundary
- Criteria Cells
- Reche Canyon/Badlands Area Plan
- Existing Core
- Proposed Core

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MSHCP Areas

SOURCE: Riverside County, 2011.

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Critical Habitat areas may require special management considerations or protections.

The project site is not located within any USFWS designated Critical Habitat area, and no threatened or endangered species were observed within the project site during the field surveys.

Table 4.4.B identifies special status plant species identified in the City's *General Plan Final EIR*, and in searches of the CDFW's *California Natural Diversity Data Base* (CNDDDB) and the CNPS's *Electronic Inventory of Rare and Endangered Vascular Plants of California* that may potentially occur in the project survey area.

Note: Table 4.4.B was divided into two separate tables based on the updated biological resources report and various comments regarding the presence of sensitive plants and wildlife in the area. For the original Table 4.4.B please refer to Final EIR Volume IV, Section 4.4, Table 4.4.B.

Note: The following sections were reorganized from the original DEIR to be more consistent with the updated biological resource reports, but the data has not substantially changed.

Federally Endangered Plant Species. As shown in Table 4.4.B, two federally endangered plant species, San Jacinto Valley crownscale (*Atriplex coronata* var. *notatior*) and slender-horned spineflower (*Dodecahema leptoceras*), were analyzed for their potential to occur in the project area and the off-site facilities. No evidence of these plant species was found during reconnaissance-level surveys. In addition, no suitable habitat for this species occurs on site due to historic agricultural activities, regular disking of the site, and dominance of sparse, non-native, low-quality vegetation. No additional federally endangered plant species were analyzed for potential to occur in the project area and off-site facilities because no additional federally endangered plant species are known to occur on, or in the vicinity of, the site. No suitable habitat was found in the project area or off-site facilities to support other federally endangered plant species. Therefore, federally endangered plant species are not likely to occur in the project area or off-site facilities.

Federally Threatened Plant Species. As shown in Table 4.4.B, one federally threatened plant species, thread-leaved brodiaea (*Brodiaea filifolia*), was analyzed for its potential to occur in the project area. No evidence of this federally threatened plant species was found and no suitable habitat for this federally threatened plant species occurs on site due to historic agricultural activities, regular disking of the site, and dominance of sparse, non-native low-quality vegetation. No additional federally threatened plant species were analyzed for their potential to occur in the project area because no additional federally threatened plant species are known to occur on, or in the vicinity of, the site. No suitable habitat was found during the site surveys to support other federally threatened plant species. Therefore, federally threatened plant species are not likely to occur in the project area.

Federally Proposed Endangered, Proposed Threatened, Federal Candidate, and Federal Plant Species of Concern. The USFWS has developed several categories for sensitive species not yet determined to have reached endangered or threatened status. Generally, federally proposed endangered or threatened species are species considered unofficially endangered or threatened (i.e., final regulatory action formally listing such species has not yet occurred). Federal candidate species are species who are candidates for becoming listed as endangered or threatened, and Federal species of concern are species whose numbers are considered low enough to have approached Federal candidate status.

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Table 4.4.B: Sensitive Plant Species in the WLC Project Area

Scientific Name	Common Name	Status			Preferred Habitat	Life Form	Bloom Period	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
		USFWS	CNPS	SE					
<i>Atriplex coronata</i> var. <i>notator</i>	San Jacinto valley crownscale	FE	1B.1	—	Occurs in playas, chenopod scrub, grasslands, and vernal pools. Specifically found in dry alkali flats in the San Jacinto River Valley. Elevation limits: 1,200 to 1,500 feet.	Annual herb	Apr to Aug	Covered	Not Likely to Occur. No alkali flats occur in the WLCSP. Recorded approximately 2.5 miles southeast of the WLCSP (CNDDDB 2012) and 1.5 miles south of the study area boundary (RCA 2013).
<i>Brodiaea filifolia</i>	Thread-leaved brodiaea	FT	1B.1	SE	Occurs in coastal scrub, cismontane woodland, grasslands, and vernal pools. Usually associated with annual grassland and vernal pools in clay soils. Elevation limits: 75 to 2,500 feet.	Perennial herb bulbiferous	Mar to Jun	Covered	Not Likely to Occur. No clay soils or vernal pools occur in the WLCSP. Recorded approximately 5 miles south of the WLCSP (CNDDDB 2012) and 4 miles south according to the BMP (RCA 2013).
<i>Calochortus plummerae</i>	Plummer's mariposa lily	—	4.2	—	Occurs in coastal scrub, chaparral, grasslands, cismontane woodlands, and lower montane coniferous forests. Found in rocky and sandy soils, usually of granitic or alluvial material. Very common after fire. Elevation limits: 300 to 4,500 feet.	Bulbiferous herb	May to Jul	Not Covered	Moderate Potential to Occur. The portion of the WLCSP that contains sandy soils and chaparral/RSS along the western border of the project in an area slated as open space. Recorded approximately 2 miles east of the WLCSP. (CNDDDB 2012)
<i>Centromadia pungens</i> ssp. <i>laevis</i>	Smooth tarplant	—	1B.1	—	Occurs in grasslands, chenopod scrub, meadows, playas, and riparian woodland. Prefers alkali meadow and alkali scrub. Elevation limits: 0 to 1,500 feet.	Annual herb	Apr to Sep	Covered	Not Likely to Occur. No alkali soils occur in the WLCSP. Recorded approximately 3 miles west of the WLCSP (CNDDDB 2012) and 2.5 miles south by the BMP (RCA 2013).

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Table 4.4.B: Sensitive Plant Species in the WLC Project Area

Scientific Name	Common Name	Status		Preferred Habitat	Life Form	Bloom Period	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
		USFWS	CNPS					
<i>Chorizanthe parryi</i> var. <i>parryi</i>	Parry's spineflower	—	1B.1	Occurs in coastal scrub and chaparral. Found on dry slopes and flats, sometimes at interface of two vegetation types, on dry, sandy soils. Elevation limits: 150 to 5,000 feet.	Annual herb	Apr to Jun	Covered	Moderate Potential to Occur. The portion of the WLCSP that contains sandy soils and chaparral/RSS along the western border of the project in an area slated as open space. Recorded approximately 4.5 miles northwest of WLCSP. (CNDDDB 2012)
<i>Dodecahema leptoceras</i>	Slender-horned spineflower	FE	1B.1	Occurs in chaparral and alluvial fan sage scrub. Prefers flood deposited terraces and washes. Elevation limits: 600 to 2,300 feet.	Annual herb	Apr to Jun	Covered	Low Potential to Occur. The WLCSP contains several natural drainages; one contains a mixture of RSS and mule fat scrub. The remaining drainages are generally devoid of vegetation. Recorded approximately 7 miles northwest of the WLCSP. (CNDDDB 2012)
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	—	1B.1	Occurs in coastal salt marshes, playas, grasslands, and vernal pools. Usually found on alkali soils in playas, sinks, and grasslands. Elevation limits: 1 to 4,500 feet.	Annual herb	Feb to Jun	Covered	Not Likely to Occur. No alkali soils, marshes, or vernal pools occur in the WLCSP. Observed approximately 2 miles south of WLCSP (CNDDDB 2012) and as close as 0.75 mile to the south of the WLCSP study area according to the BMP (RCA 2013).

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Table 4.4.B: Sensitive Plant Species in the WLC Project Area

Scientific Name	Common Name	Status		Preferred Habitat	Life Form	Bloom Period	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
		USFWS	CNPS					
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass	—	4.3	Occurs in chaparral and coastal scrub on dry soils. Elevation limits: 1 to 3,000 feet.	Annual herb	Jan to Jul	Not Covered	Low Potential to Occur. The portion of the WLCSP that contains sandy soils and chaparral/RSS along the western border of the project in an area slated as open space. Recorded approximately 7 miles northwest of WLCSP. (CNDDDB 2012)
<i>Nama stenocarpum</i>	Mud nama	—	2B.2	Occurs in marshes, swamps, lakeshores, riverbanks, and intermittently wet areas. Elevation limits: 15 to 1,500 feet.	Annual/perennial herb	Jan to Jul	Covered	Not Likely to Occur. No lakes, marshes or riverine areas occur in the WLCSP. The drainage features onsite do not remain wet long enough to be considered suitable habitat. Recorded approximately 2.5 miles southeast of WLCSP. (CNDDDB 2012)
<i>Symphotrichum defoliatum</i>	San Bernardino aster	—	1B.2	Occurs in meadows, seeps, marshes, swamps, coastal scrub, cismontane woodland, lower montane coniferous forest, and grasslands. Found in vernal mesic areas near ditches, streams, and springs. Elevation limits: 6 to 6,000 feet.	Rhizomatous herb	Jul to Nov	Not Covered	Not Likely to Occur. The ditches and erosion features in the WLCSP are heavily disturbed. Recorded 2.5 miles northeast of the WLCSP. (CNDDDB 2012)

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Table 4.4.B: Sensitive Plant Species in the WLC Project Area

Species		Status		Preferred Habitat	Life Form	Bloom Period	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
		USFWS	CNPS					
Scientific Name	Common Name	USFWS	CNPS	Preferred Habitat	Life Form	Bloom Period	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
<i>Trichocoronis wrightii</i> var. <i>wrightii</i>	Wright's trichocoronis	—	2B.1	Occurs in marshes and swamps, riparian forest, meadows, seeps, and vernal pools. Found in mud flats of vernal lakes, drying riverbeds, and alkali meadows. Elevation limits: 10 to 1,300 feet.	Annual herb	May to Sep	Covered	Not Likely to Occur. No marshes, riverine or vernal pool areas occur in the WLCSP. Recorded approximately 4 miles south of the WLCSP. (CNDDDB 2012)

U.S. Fish and Wildlife Service

- FE Federal Endangered
- FT Federal Threatened
- PE Proposed Endangered
- PT Proposed Threatened
- FC Federal Candidate
- FSC Species of Concern*
- *No longer recognized as a Federal designation.

California Native Plant Society

- California Department of Fish and Game
- 1A Plants presumed extinct in California.
- 1B Plants rare, threatened, or endangered in California and elsewhere.
- 2 Plants rare, threatened, or endangered in California, but more common elsewhere.
- 3 Plants about which we need more information.
- 4 Plants of limited distribution.

Not Likely to Occur - There are no present or historical records of the species occurring on or in the immediate vicinity (within 3 miles) of the WLCSP and the diagnostic habitats strongly associated with the species do not occur on or in the immediate vicinity of the site.

Low Potential to Occur - There is a historical record of the species in the vicinity of the WLCSP and potentially suitable habitat onsite, but existing conditions (e.g., density of cover, prevalence of non-native species, evidence of disturbance, limited habitat area, isolation) substantially reduce the possibility that the species may occur. The site is above or below the recognized elevation limits for this species.

Moderate Potential to Occur - The diagnostic habitats associated with the species occur on or in the immediate vicinity of the WLCSP, but there is not a recorded occurrence of the species within the immediate vicinity (within three miles). Some species that contain extremely limited distributions may be considered moderate, even if there is a recorded occurrence in the immediate vicinity.

High Potential to Occur - There is both suitable habitat associated with the species and a historical record of the species on or in the immediate vicinity of the WLCSP (within 3 miles).

Species Present - The species was observed in the WLCSP at the time of the survey or during a previous biological survey.
 Source: Habitat Assessment, MSHCP Consistency Analysis, and HANS report, Michael Brandman Associates, September 2014.

Federally Protected Plant Species. As shown in Table 4.4.B, no Federal plant species of concern were analyzed for their potential to occur in the WLCSP and off-site facilities because no evidence of any Federal plant species of concern was found in the project area, nor was any suitable habitat found due to historic agricultural activities, regular disking of the site, and dominance of sparse, non-native low-quality vegetation.

Federally Endangered Wildlife Species. As shown in Table 4.4.C, four federally endangered wildlife species were analyzed for potential to occur in the project area or off-site facilities: Riverside fairy shrimp (*Streptocephalus woottoni*), southwestern willow flycatcher (*Empidonax traillii extimus*), least Bell's vireo (*Vireo bellii pusillus*), and Stephens' kangaroo rat (*Dipodomys stephensi*). No evidence of any federally endangered wildlife species was found in the project area or off-site facilities. Stephens' kangaroo rat is the only federally listed wildlife species potentially occurring on site. Although no sign of Stephens' kangaroo rat was identified during the site surveys, it was determined that this species may range through the general area. This species is commonly found in ruderal and minimally disturbed areas. Low quality habitat was observed along existing roadsides.

Since the project area is within the known range of this species and low quality habitat was identified on site, there is a moderate potential for Stephens' kangaroo rat to occupy some portion of the WLC project area or off-site facilities.

No suitable habitat for Riverside fairy shrimp, southwestern willow flycatcher, and least Bell's vireo, occurs on site due to historic agricultural activities, regular disking of the site, and dominance of sparse, non-native low-quality vegetation. No additional federally endangered wildlife species were analyzed in Table 4.4C for their potential to occur in the project area because no additional federally endangered wildlife species are known to occur on, or in the vicinity of, the site.

Federally Threatened Wildlife Species. As shown in Table 4.4.C, Coastal California gnatcatcher (*Polioptila californica californica*) is known to occur within moderate to high quality coastal sage scrub in the general area and some suitable habitat occurs on site for coastal California gnatcatcher. There is marginal Riversidean sage scrub in the north near SR-60 and Gilman Springs Road and in the proposed Open Space Area adjacent to the Lake Perris State Recreation Area (LPSRA) south of Brodiaea Avenue, west of Theodore Street and east of Redlands Boulevard. No additional federally threatened wildlife species were analyzed for their potential to occur in the WLC project area.

Federally Proposed Endangered, Proposed Threatened, Federal Candidate, and Federal Species of Concern. The USFWS has developed several categories for sensitive species not yet determined to have reached endangered or threatened status. Generally, federally proposed endangered or threatened species are species considered unofficially endangered or threatened (i.e., final regulatory action formally listing such species has not yet occurred). Federal candidate species are species who are candidates for becoming listed as endangered or threatened, and Federal species of concern are species whose numbers are considered low enough to have approached Federal candidate status. The western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) is the only Federal Candidate Species with a potential to occur in this area, but this species is not likely to occur in the WLCSP and off-site facilities. In addition, it is a covered species under the MSHCP.

Federally Protected Wildlife Species. There was only one Federal wildlife species of concern analyzed for its potential to occur in the WLCSP and off-site facilities (see the western yellow-billed cuckoo discussed above). No evidence of any other Federal wildlife species of concern was found in the project area nor does any suitable habitat occur due to historic agricultural activities, regular

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Table 4.4.C: Sensitive Wildlife Species in the WLC Project Area

Scientific Name	Species		Status		Required Habitat	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
	Common Name	Federal	State	Other			
Branchiopods							
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	FE	—	CDFW: CSC	Occurs in tectonic swales and earth slump basins in grassland and coastal sage scrub. Inhabits seasonally astatic pools filled by winter/spring rains. Hatches in warm water later in the season.	Covered	Not Likely to Occur. No vernal pools occur in the WLCSP. Observed farther than 5 miles south of the WLCSP.
Reptiles and Amphibians							
<i>Aspidoscelis hyperythra</i>	Orange-throated whiptail	—	—	CDFW: CSC	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats. Prefers washes and other sandy areas with patches of brush and rocks. Also near perennial plants where termites, its major food, can be found.	Covered	Low Potential to Occur. Limited coastal scrub is present in the WLCSP. Woody vegetation onsite is very sparse and is not considered sufficient to support the species. The nearest occurrence of the species was recorded approximately 0.3 mile north of the WLCSP; however, in the eighteen years since the observation, the previous site conditions have changed to become unsuitable habitat (CNDDDB 2012).
<i>Crotalus ruber ruber</i>	Northern red-diamond rattlesnake	—	—	CDFW: CSC	Inhabits chaparral, woodland, grassland, and desert habitats. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks, or surface cover objects.	Covered	Not Likely to Occur. No rocky areas and dense native plant communities occur in the WLCSP and the site is regularly disturbed. Recorded approximately 1 mile south of the WLCSP; however, the observation occurred over 80 years ago (CNDDDB 2012). The BMP has recently found the species in the same area as the CNDDDB sighting (RCA 2013)
<i>Phrynosoma coronatum blainvillei</i>	Coast horned lizard	—	—	CDFW: CSC	Inhabits coastal sage scrub and chaparral in arid and semi-arid climates. Prefers friable, rocky, or shallow sandy soils.	Covered	Low Potential to Occur. The portion of the WLCSP that contains sandy soils or rocky soils and chaparral/RSS along the western border of the project in an area slated as open space. Recorded approximately 4 miles northwest of the WLCSP (CNDDDB 2012)

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Table 4.4.C: Sensitive Wildlife Species in the WLC Project Area

Scientific Name	Species			Status		Required Habitat	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
	Common Name	Federal	State	Other				
<i>Spea hammondi</i>	Western spadefoot	—	—	CDFW: CSC		Occurs primarily in grassland habitats, but also found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.	Covered	Not Likely to Occur. No vernal pools or native woodlands occur in the WLCSP. Recorded approximately 2 miles south and west of the WLCSP (CNDDDB 2012). The BMP studies have occurrences approximately 0.7 mile south of the study area boundary (RCA 2013)
Birds								
<i>Agelaius tricolor</i>	Tricolored blackbird	—	—	CDFW: CSC		Highly colonial species. Requires open water, protected nesting substrate, and foraging areas with insect prey within a few miles of the colony.	Covered	Low Potential to Occur. No open water or protected nesting habitat is located in the WLCSP. Numerous nesting pairs were recorded within the wheat fields on the southeastern portion of the WLCSP in 1995. The wheat has since been removed and no suitable nesting vegetation remains (CNDDDB 2012).
<i>Aimophila ruficeps canescens</i>	Southern California rufous-crowned sparrow	—	—	CDFW: CSC		Resident in coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	Covered	Low Potential to Occur. While sparse RSS and chaparral are present within the WLCSP, no steep slopes are present in the WLCSP. Recorded approximately 4 miles west of the WLCSP (CNDDDB 2012). The BMP database has the species less than 1.0 mile from the WLCSP study area boundary (RCA 2013).
<i>Amphispiza belli belli</i>	Bell's sage sparrow	—	—	CDFW: CSC		Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in southern portion of range. Nests typically located on the ground beneath shrub or in shrub 6 to 18 inches above ground.	Covered	Not Likely to Occur. No dense stands chaparral or coastal sage scrub vegetation occurs in the WLCSP. Recorded approximately 4 miles northwest of the WLCSP (CNDDDB 2012) and according to the BMP 4 miles south of the WLCSP study area (RCA 2013).

Table 4.4.C: Sensitive Wildlife Species in the WLC Project Area

Scientific Name	Common Name	Status			Required Habitat	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
		Federal	State	Other			
<i>Athene cunicularia</i>	Burrowing owl	—	—	CDFW: CSC	Occupies burrows in open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably the California ground squirrel.	Covered	Present. Despite the heavy disturbance the WLCSP contains flat topography with sparse, low-lying vegetation and various California ground squirrel burrows. Observed within the WLCSP in 2006; however, focused surveys conducted in 2010 and 2012 found the WLCSP and surroundings to be unoccupied. The 2013 survey of the WLCSP again found a pair of owls (MBA 2013b)
<i>Aquila chrysaetos</i>	Golden eagle	—	—	CDFW: FP	Open mountains, foothills, plains.	Covered	Low Potential to Occur. The WLCSP contains open flat area that is considered marginally suitable foraging habitat, but not suitable nesting habitat. Recorded approximately 1 mile south of the WLCSP (RCA 2013)
<i>Buteo swainsonii</i>	Swainson's hawk	—	ST	—	Grasslands and riparian areas	Covered	Low Potential to Occur. The WLCSP contains open flat area that is considered marginally suitable foraging habitat, but not suitable nesting habitat. Recorded approximately 1 mile south of the WLCSP (RCA 2013)
<i>Buteo regalis</i>	Ferruginous hawk	—	—	CDFW: CSC	Winters in open grasslands, sagebrush flats, desert scrub, low foothills, and fringes of piñon-juniper habitats.	Covered	Low Potential to Occur. The WLCSP contains open flat area that is considered marginally suitable foraging habitat, but not suitable nesting habitat. Recorded approximately 1 mile northeast of the WLCSP (CNDDB 2012) and 2 miles south of the WLCSP according to BMP records (RCA 2013).

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Table 4.4.C: Sensitive Wildlife Species in the WLC Project Area

Scientific Name	Species			Status			Required Habitat	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
	Common Name	Federal	State	Other					
<i>Coccyzus americanus occidentalis</i>	Western yellow-billed cuckoo	FC	SE	—	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Specifically nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Covered	Not Likely to Occur. No riparian plant communities occur in the WLCSP. Recorded approximately 5.5 miles northwest of the WLCSP (CNDDDB 2012).		
<i>Elanus leucurus</i>	White-tailed kite	—	—	CDFW: FP	Nests in rolling foothills/valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodlands. Prefers open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Covered	Present. The WLCSP contains suitable foraging habitat, but few dense-topped trees occur in the vicinity of the site. Known to occur in the San Jacinto Valley but not recorded within 7 miles of the site (CNDDDB 2012). The BMP indicates that the species is found 1.0 mile from the WLCSP study area boundary (2013). Species was observed foraging within the southern portion of the survey area adjacent to the SJWA.		
<i>Eremophila alpestris actia</i>	Southwestern willow flycatcher	FE	SE	—	Nests in riparian woodlands in southern California.	Covered	Not Likely to Occur. No riparian plant communities occur in the WLCSP. Recorded approximately 6.5 miles east of the WLCSP (CNDDDB 2012).		
<i>Eremophila alpestris actia</i>	California horned lark	—	—	CDFW: CSC	Inhabits short-grass prairie, bald hills, mountain meadows, open coastal plains, fallow grain fields, and alkali flats.	Covered	Present. The WLCSP contains flat, fallow grain fields that constitute suitable nesting habitat. Observed in the WLCSP during the reconnaissance-level surveys (MBA 2012).		
<i>Falco columbarius</i>	Merlin	—	—	CDFW: CSC	Winters in seacoast, tidal estuaries, open woodlands, savannahs, edges of grasslands and deserts, farms and ranches. Clumps of trees or windbreaks are required for roosting in open country.	Covered	Low Potential to Occur. Portions of the WLCSP contain windbreak trees and open farmland. Known to occur in the San Jacinto Valley but not recorded within 7 miles of the site (CNDDDB 2012). The BMP database has the species less than a mile south of the WLCSP study area (RCA 2013).		

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Table 4.4.C: Sensitive Wildlife Species in the WLC Project Area

Scientific Name	Species			Status			Required Habitat	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
	Common Name	Federal	State	Other					
<i>Falco mexicanus</i>	Prairie falcon	—	—	CDFW: CSC	Inhabits dry, open terrain, either flat or hilly. Breeding sites located on cliffs.	Covered	Low Potential to Occur. The WLCSP contains marginally suitable foraging habitat but no suitable nesting habitat. Known to occur in the San Jacinto Valley but not recorded within 7 miles of the site (CNDDDB 2012).		
<i>Falco peregrinus anatum</i>	Peregrine falcon	FD	SE	CDFW: FP	Nests near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds, and human-made structures. Nest consists of a scrape on a depression or ledge in an open site.	Covered	Low Potential to Occur. The WLCSP contains marginal nesting habitat. Known to occur in the San Jacinto Valley but not recorded within 7 miles of the site (CNDDDB 2012). The BMP indicates the species is within 1.0 mile of the southern boundary of the study area (RCA 2013).		
<i>Icteria virens</i>	Yellow-breasted chat	—	—	CDFW: CSC	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Specifically nests in low, dense riparian vegetation, consisting of willow, blackberry, wild grape. Forages and nests within 10 feet of ground.	Covered	Not Likely to Occur. No riparian plant communities occur in the WLCSP. Recorded approximately 5.5 miles northwest of the WLCSP (CNDDDB 2012).		
<i>Lanius ludovicianus</i>	Loggerhead shrike	—	—	CDFW: CSC	Inhabits broken woodlands, savannah, pinyon-juniper, Joshua tree and riparian woodlands, desert oases, scrub and washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	Covered	Present. The WLCSP contains flat, open area that is suitable foraging habitat but not suitable nesting habitat. Observed by MBA during previous surveys, approximately within the WLCSP (MBA 2012).		
<i>Plegadis chihui</i>	White-faced ibis	—	—	CDFW: CSC	Rookery sites include shallow freshwater marshes. Nests in dense tule thickets interspersed with areas of shallow water for foraging.	Covered	Not Likely to Occur. No marshes or bodies of water occur in the WLCSP. Recorded approximately 3 miles southeast of the WLCSP (CNDDDB 2012).		

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Table 4.4.C: Sensitive Wildlife Species in the WLC Project Area

Scientific Name	Common Name	Status			Required Habitat	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
		Federal	State	Other			
<i>Polioptila californica californica</i>	Coastal California gnatcatcher	FT	—	CDFW: CSC	Obligate, permanent resident of coastal sage scrub below 2,500 feet in southern California. Prefers low coastal sage scrub in arid washes and on mesas and slopes.	Covered	Low Potential to Occur. There is limited and sparse coastal sage scrub vegetation occurs in the WLCSP. Recorded approximately 4 miles northwest of the WLCSP (CNDDDB 2012) and less than 0.5 mile of the WLCSP study area according to BMP (RCA 2013).
<i>Vireo bellii pusillus</i>	Least Bell's vireo	FE	SE	—	Summer resident in low riparian vegetation in the vicinity of water or in dry river bottoms; below 2,000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, baccharis, and mesquite.	Covered	Not Likely to Occur. No riparian plant communities or significant riparian vegetation occur in the WLCSP. Recorded approximately 3 miles northeast of the WLCSP (CNDDDB 2012) and was recorded by the BMP at 2 miles from the closest WLCSP border (RCA 2013).
Mammals							
<i>Chaetodipus fallax fallax</i>	Northwestern San Diego pocket mouse	—	—	CDFW: CSC	Inhabits coastal scrub, chaparral, and grasslands. Prefers sandy, herbaceous areas, usually in association with rocks or coarse gravel.	Covered	Present. Sandy to loamy soils occur in the WLCSP. There are limited areas of RSS and chaparral and herbaceous areas are severely limited due to agricultural activities. Species was caught within Drainage 9 (MBA 2013).
<i>Dipodomys stephensi</i>	Stephens' kangaroo rat	FE	ST	—	Primarily found in annual and perennial grasslands, but also occurs in coastal scrub and sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass, and filaree. Will burrow into firm soil.	Covered under SKRHCP	Moderate Potential to Occur. The WLCSP contains areas similar to grasslands with very sparse canopy, but is heavily disturbed. Recorded approximately adjacent to the general WLCSP on the west and south (CNDDDB 2012).
<i>Lasiorus xanthinus</i>	Western yellow bat	—	—	CDFW: CSC	Occurs in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats below 1,800 feet. Roosts in trees.	Not Covered	Not Likely to Occur. No riparian or native plant communities occur in the WLCSP. Recorded approximately 3.5 miles southwest of the WLCSP (CNDDDB 2012).

Table 4.4.C: Sensitive Wildlife Species in the WLC Project Area

Scientific Name	Species		Status			Required Habitat	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
	Common Name	Federal	State	Other				
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	—	—	CDFW: CSC		Inhabits coastal sage scrub habitats. Specifically, intermediate canopy stages of shrub, open shrub, herbaceous and tree, and herbaceous edge habitats.	Covered	Present Recorded within the MWD lands in the northern portion of the WLCSP during burrowing owl surveys (MBA 2013).
<i>Onychomys torridus ramona</i>	Southern grasshopper mouse	—	—	CDFW: CSC		Inhabits desert areas, especially scrub habitats with friable soils. Prefers low to moderate shrub cover. Feeds almost exclusively on arthropods, especially scorpions and orthopteran insects.	Not Covered	Not Likely to Occur. No shrub or scrub habitat occurs in the WLCSP. Additionally, the site is regularly disturbed by disking. Recorded approximately 4 miles southeast of the WLCSP (CNDDDB 2012).
<i>Perognathus longimembris brevinasus</i>	Los Angeles pocket mouse	—	—	CDFW: CSC		Inhabits lower elevation grasslands and coastal sage communities. Prefers open ground with fine sandy soils.	Covered	Low Potential to Occur. The sandy soils that occur in the WLCSP are limited to existing drainages with the proper coastal sage communities. Three years of trapping did not produce any Los Angeles pocket mice. Recorded approximately 3 miles south of the WLCSP (CNDDDB 2012). It was observed in BMP trapping within 2 miles of the study area (RCA 2013).
<i>Taxidea taxus</i>	American badger	—	—	CDFW: CSC		Most abundant in drier open stages of most shrub, forest, and herbaceous habitats. Needs sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents.	Not covered	Low potential to occur. The WLCSP contains limited amounts of vegetation and the ground is cultivated. Recorded approximately 8.5 miles northwest of the WLCSP (CNDDDB 2012). RCA data lists the closest recorded occurrence, just outside the 1,000-foot buffer area. Most likely limited to the badlands area north and east of the project site.

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Scientific Name	Species		Status			Required Habitat	MSHCP Coverage	Potential to Occur/Known Occurrence/Suitable Habitat
	Common Name	Federal	State	Other	Other			
Federal								
FE	Federal Endangered		SE	State Endangered		Other	CDFW: CSC California Species of Concern	
FT	Federal Threatened		ST	State Threatened			CDFW: FP Fully Protected Species	
FSC	Federal Species of Concern						CDFW: P Protected Species	
PFT	Proposed Federal Threatened							
FC	Candidate for Federal Listing							
FD	Delisted							

Not Likely to Occur - There are no present or historical records of the species occurring on or in the immediate vicinity (within 3 miles) of the WLCSP and the diagnostic habitats strongly associated with the species do not occur on or in the immediate vicinity of the site.

Low Potential to Occur - There is a historical record of the species in the vicinity of the WLCSP and potentially suitable habitat onsite, but existing conditions (e.g., density of cover, prevalence of non-native species, evidence of disturbance, limited habitat area, isolation) substantially reduce the possibility that the species may occur. The site is above or below the recognized elevation limits for this species.

Moderate Potential to Occur - The diagnostic habitats associated with the species occur on or in the immediate vicinity of the WLCSP, but there is not a recorded occurrence of the species within the immediate vicinity (within three miles). Some species that contain extremely limited distributions may be considered moderate, even if there is a recorded occurrence in the immediate vicinity.

High Potential to Occur - There is both suitable habitat associated with the species and a historical record of the species on or in the immediate vicinity of the WLCSP (within 3 miles).

Species Present - The species was observed in the WLCSP at the time of the survey or during a previous biological survey.
Source: Habitat Assessment, MSHCP Consistency Analysis, and HANS report, Michael Brandman Associates, September 2014.

disking of the site, and dominance of sparse, non-native low-quality vegetation. No additional Federal wildlife species of concern were analyzed for potential to occur in the project area because no additional Federal wildlife species of concern are known to occur on, or in the vicinity of, the site.

California State Endangered Plant Species. As shown in Table 4.4.B, two California State endangered plant species were analyzed for their potential to occur in the WLCSP and off-site facilities: slender-horned spine-flower and thread-leaved brodiaea. No evidence of these State-listed plant species was found in the project area nor is there any suitable habitat for these State-listed plant species due to regular disking of the site and dominance of sparse, non-native low-quality vegetation. No additional State-listed plant species were analyzed for potential to occur in the project area because no additional State-listed plant species are known to occur on, or in the vicinity of, the site, nor was any suitable habitat found to support other State-listed plant species. Therefore, State-listed plant species are not likely to occur in the project area and there is no potential impact to State endangered plant species.

California State Threatened Plant Species. As shown in Table 4.4.B, no California State threatened plant species are known to occur on, or in the vicinity of, the project site and no suitable habitat occurs within the project area for any California State threatened plant species. Therefore, California State threatened plant species are not likely to occur in the project area and there is no potential impact to State threatened plant species.

California State Endangered Wildlife Species. As shown in Table 4.4.B, four California State endangered wildlife species were analyzed for their potential to occur in the WLCSP and off-site facilities: western yellow-billed cuckoo, southwestern willow flycatcher, least Bell's vireo, and peregrine falcon (*Falco peregrinus anatum*). No evidence of these California State endangered wildlife species was found in the project area. In addition, no suitable habitat for these species occurs within the project area due to historic agricultural activities, regular disking of the site, and dominance of sparse, non-native low-quality vegetation. No additional California State endangered wildlife species were analyzed for potential to occur in the project area because no additional California State endangered wildlife species are known to occur on, or in the vicinity of, the site. No suitable habitat was found in the project area to support other California State endangered wildlife species. Therefore, California State endangered wildlife species are not likely to occur in the project area and there is no potential impact to State endangered wildlife species.

California State Threatened Wildlife Species. As shown in Table 4.4.C, two California State threatened wildlife species was analyzed for its potential to occur in the project area: Swainson's hawk (*Buteo swainsonii*) and Stephens' kangaroo rat. There is little to no nesting habitat within the WLCSP for Swainson's hawk and marginally quality foraging habitat. This species is known to occur with the adjacent SJWA and has a low potential to occur within the WLCSP project site. Although no sign of Stephens' kangaroo rat was identified in the project area, MBA concluded that this species may range through the general area. This species is known to occur in ruderal and minimally disturbed areas. Marginal habitat was observed along existing roadsides and within active pasture areas. Since the project area is within the known range of this species, and marginal habitat was identified on site, there is a moderate potential for Stephens' kangaroo rat to occupy some portion of the area.

No additional California State threatened wildlife species are known to occur on, or in the vicinity of, the site. No suitable habitat was found in the project area support other California State threatened wildlife species. Therefore, except for the Stephens' kangaroo rat, California State threatened wildlife species are not likely to occur in the project area and there is no potential impact to California State threatened wildlife species.

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California State Fully Protected Species. The classification of Fully Protected was California's initial effort in the 1960s to identify and provide additional protection to those animals that were rare or faced possible extinction. The list of fully protected species included fish, mammals, amphibians, reptiles, birds, and mammals. Most fully protected species are currently listed as threatened or endangered species under the more recent endangered species laws and regulations.

Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

California State Fully Protected Species. As shown in Table 4.4.C, three California State Fully Protected species were analyzed for their potential to occur in the project area: golden eagle (*Aquila chrysaetos*), white-tailed kite (*Elanus leucurus*) and peregrine falcon. No suitable nesting habitat for golden eagle, white-tailed kite or peregrine falcon occurs within the area due to historic agricultural activities, regular disking of the site, and dominance of sparse, non-native low-quality vegetation. However, agricultural land does represent marginal quality foraging habitat within the WLCSP project site and adjacent CDFW Conservation Areas. No additional California State fully protected wildlife species were analyzed for their potential to occur in the project area because no additional California State fully protected wildlife species are known to occur on, or in the vicinity of, the site. No suitable habitat was found in the WLCSP and off-site facilities to support other California State fully protected wildlife species. Therefore, California State fully protected wildlife species are not likely to occur in the project area and there is no impact to California State fully protected wildlife species.

California Rare Plants Species and California Species of Concern. California Species of Concern (CSC) applies to animals not listed under the FESA or CESA, but are declining at a rate that could result in Federal or State listing or historically occur in low numbers and known threats to their persistence currently exist.

California Rare Plant Species. No California rare plant species are known to occur on, or in the vicinity of, the project area nor is any suitable habitat known to occur within the area. Therefore, no California rare plant species were analyzed for their potential to occur in the project area. Eleven special status plant species, as determined by the California Native Plant Society, were identified as potentially occurring within the project area. Three of the species (Plummer's mariposa lily [*Calochortus plummerae*], Robinson's pepper-grass [*Lepidium virginicum* var. *robinsonii*], and San Bernardino aster [*Symphotrichum defoliatum*]) are not covered by the MSHCP. Plummer's mariposa lily and Robinson's pepper-grass have a moderate to low potential to occur based on habitat type and soils requirements. These species were not identified during sensitive plant surveys (MBA 2010).

The 2010 sensitive plant survey was conducted based on the 2010 site boundary and the then-current existing conditions. Several areas within the current WLCSP were not surveyed because they were either not included in the proposed development footprint (such as the Off-site Improvement Areas) or were not within areas of suitable habitat. Therefore, areas that contained suitable habitat, but are outside of the proposed development footprint, or areas that were not accessible during the survey, were not included. Since all areas of the WLCSP were not surveyed, additional plant surveys are recommended on a project-by-project basis. There has been below-average rainfall in the area since the 2010 plant surveys were conducted. Project-level surveys will be required prior to submittal of the CEQA documents as part of the project-specific environmental review process.

The Sensitive Plant Focused Survey Report only discusses the plant communities in which focused plant surveys were conducted. Many of the areas within the Extensive Agricultural Areas and the Urban/Developed areas contain elements of Riversidean sage scrub, non-native grasslands, and riparian habitat, but not in a sufficient amount to be considered a separate plant community. The

remaining nine plant communities found within the WLCSP, either do not provide suitable habitat or are not within the proposed project impact area; these plant communities will not be directly or indirectly impacted by project development.

Updated focused plant surveys will likely be warranted on a project-level basis, especially if existing site conditions change over time. If the agricultural fields are left fallow, suitable habitat for a number of sensitive plant species may develop. Therefore, additional focused plant surveys will be required on a project-by-project basis as specific developments are proposed and subsequent or supplemental CEQA documentation is prepared.

The potential habitat for these species is confined to RSS and sandy-rocky soils, which are confined to the proposed open space area in the southwestern portion of the Specific Plan area.

California Species of Concern. Twenty-one California Wildlife Species of Concern were analyzed for their potential to occur in the WLCSP and off-site facilities:

- Orange-throated whiptail (*Aspidoscelis hyperythra*)
- Coast horned lizard (*Phrynosoma coronatum*)
- Tricolored blackbird (*Agelaius tricolor*)
- Bell's sage sparrow (*Amphispiza belli belli*)
- Ferruginous hawk (*Buteo regalis*)
- Merlin (*Falco columbarius*)
- Yellow-breasted chat (*Icteria virens*)
- White-faced ibis (*Plegadis chihi*)
- Western yellow bat (*Lasiurus xanthinus*)
- Southern grasshopper mouse (*Onychomys torridus ramona*)
- American badger (*Taxidea taxus*)
- Northern red-diamond rattlesnake (*Crotalus ruber ruber*)
- Western spadefoot (*Spea hammondi*)
- Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*)
- Burrowing owl (*Athene cunicularia hypugaea*)
- California horned lark (*Eremophila alpestris actia*)
- Prairie falcon (*Falco mexicanus*)
- Loggerhead shrike (*Lanius ludovicianus*)
- Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*)
- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)
- Los Angeles pocket mouse (*Perognathus longimembris brevinasus*)

The project area contains suitable foraging habitat for loggerhead shrike, ferruginous hawk, merlin, prairie falcon, California horned lark, and burrowing owl but no suitable nesting habitat for ferruginous hawk, merlin, or prairie falcon. Suitable ground-nesting habitat occurs for burrowing owl and California horned lark. No sign of burrowing owl was identified during focused surveys conducted in 2012. However, burrowing owl was identified within the southern portion of in the WLCSP project site and offsite facilities during focused surveys conducted in 2013 and, it was determined that this species may range through the general area. Several California horned larks and loggerhead shrikes were observed foraging within the area. No suitable habitat for western spadefoot, Bell's sage sparrow, yellow-breasted chat, white-faced ibis, western yellow bat, southern grasshopper mouse, and American badger occurs within the project area due to historic agricultural activities, regular disking of the site, and dominance of sparse, non-native low-quality vegetation. The western yellow bat, southern grasshopper mouse and American badger are not covered under the MSHCP. However, since there is no suitable habitat for these species, no impact is expected to occur. The remaining species are covered under the MSHCP.

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There is limited suitable habitat for orange-throated whiptail, northern red-diamond rattlesnake, coast horned lizard, southern rufous-crowned sparrow, northwestern San Diego pocket mouse, San Diego jackrabbit, and Los Angeles pocket mouse in the project area. These species are generally associated with RSS, which is limited to the north near SR-60 and Gilman Springs Road and in the proposed Open Space Area adjacent to the LPSRA between Theodore Street and Redlands Boulevard, just south of Brodiaea Avenue. Focused surveys for Los Angeles pocket mouse in 2005, 2010, 2012, and 2013 were negative. The orange-throated whiptail is not covered under the MSHCP. There is limited habitat for the orange-throated whiptail in an area that is currently proposed for open space in the southwestern corner of the Specific Plan area. The other species mentioned are covered under the MSHCP. There is a low potential for these species to occur.

No additional California wildlife species of concern were analyzed for potential to occur in the project area because none is known to occur on, or in the vicinity of, the site. No suitable habitat was found in the project area to support other California Wildlife Species of Concern. Therefore, except for the burrowing owl, loggerhead shrike, and California horned lark, California Wildlife Species of Concern are not likely to occur in the WLCSP and off-site facilities.

California Native Plant Society (CNPS). The CNPS is a non-profit organization whose collaborative efforts in research helps maintain an inventory of rare and endangered plants that occur throughout California. The CNPS has developed its own classification system in defining the degree of endangerment for sensitive plant species that models that of the FESA and CESA. Plants considered to be rare, threatened, or endangered in California are designated as List 1B or List 2 plant species. Plants for which more information is needed to determine their status are designated List 3 species. Plants with limited distribution are designated as List 4 species.

CNPS Listed Plant Species. Eight CNPS List 1B plant species were analyzed for potential to occur in the project area: San Jacinto Valley crowscale, thread-leaved brodiaea, Plummer's mariposa lily, smooth tarplant (*Centromadia pungens* ssp. *laevis*), slender-horned spineflower, Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), Robinson's peppergrass, and San Bernardino aster.

Two CNPS List 2 plant species, mud nama (*Nama stenocarpum*) and Wright's trichocoronis (*Trichocoronis wrightii* var. *wrightii*), were analyzed for potential to occur in the project area.

One CNPS List 3 plant species, Parry's spineflower (*Chorizanthe parryi* var. *parryi*), was also analyzed for potential to occur in the project area.

No evidence of any CNPS List 1B, List 2, or List 3 plant species were observed in the project area. In addition, no suitable habitat for any of these species occurs due to historic agricultural activities, regular disking of the site, and dominance of sparse, low quality non-native vegetation.

No additional CNPS List plant species were analyzed for potential to occur in the WLCSP and off-site facilities because none is known to occur on, or in the vicinity of, the site. No suitable habitat was found in the project area to support other CNPS List plant species. Therefore, CNPS List plant species are not likely to occur in the project area.

Migratory Bird Treaty Act and Section 3503 of the State Fish and Game Code. The project area contains suitable nesting habitat for ground-nesting birds such as burrowing owl and horned lark. The few large trees on the site provide suitable habitat for other migratory birds.

Raptor Foraging Habitat. The project area contains flat, open areas with sparse vegetation, which provides marginal foraging habitat for some raptors species. Due to the regular, heavy disturbance associated with the various agricultural activities in the area, and the limited size of the site in relation

to the expansive foraging habitat in the vicinity including the CDFW Conservation Buffer Area and the SJWA, LPSRA, and the Badlands to the east, the foraging habitat on site is considered marginally suitable and of poor quality (MBA 2013, pages 94-95).

4.4.1.14 MSHCP Consistency Analysis

a. Burrowing Owl

The burrowing owl is an avian species of special concern that is protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503. This species typically occurs in grassland and scrub habitats characterized by low-growing vegetation with an abundance of small mammal burrows, including the California ground squirrel. It often prefers areas with moderate disturbance and/or berms or drainage features. Reasons for burrowing owl population decline include habitat destruction, insecticide poisoning, rodenticide (particularly squirrel eradication), and shooting.

The project area contains potentially suitable habitat for burrowing owl, such as flat, open, valley floor plains occupied by non-native grasslands, fallow fields, and agricultural lands. Details of the methodologies for the focused surveys are discussed in Appendix D, Burrowing Owl Focused Surveys. Details for these focused surveys for burrowing owl may not match exactly with the project area as the boundaries of the various studies have evolved over time. The 2012 studies for burrowing owl encompassed the 3,300 acres of the project area.

Burrowing owl was identified within the southern portion of the WLCSP project site during focused surveys conducted in 2013, and may continue to range through the general area. Focused surveys for burrowing owl conducted in June–July 2012 did not locate any owls (MBA 2012b). During focused surveys conducted by MBA in 2005 (covering approximately 1,778 acres of the project area), a single breeding pair of burrowing owls was observed within an ephemeral drainage feature (Drainage 4) that longitudinally traverses the western portion of the survey area. The owls were observed perching and in flight along the western bank of the drainage feature, immediately south of its intersection with Dracaea Avenue. Conditions in this area have changed over the 6-year period and this was no longer habitat due to changes in land use.

In addition, focused burrow and burrowing owl surveys conducted by MBA in 2006 (750 acres), 2007 (2,904 acres), 2010 (3,714 acres), and 2012 (3,300 acres) did not determine the presence of any burrowing owls. (Appendix D, Burrowing Owl Focused Surveys). Burrowing owls were recorded in 2008 (246 acres) just south of the Skecher's Logistic Center (Fierro, personal communication). A single burrowing owl was observed within the temporary detention basin located south of the Skecher's building during the March 2012 site visit.

The disked and fallow fields within the project area continue to provide suitable foraging habitat for burrowing owl. The area contains numerous California ground squirrel and desert cottontail burrows, which are potentially suitable for burrowing and nesting by the owls. Therefore, this species appears to be present within portions of the project area and the CDFW Conservation Buffer Area, although it may not be a permanent resident.

b. Los Angeles Pocket Mouse

Los Angeles pocket mouse (LAPM) is a California species of special concern that inhabits lower elevation grasslands and scrub communities within Los Angeles, San Bernardino, and Riverside Counties. Los Angeles pocket mouse is the smallest of the pocket mice subspecies and is adapted for arid or semi-arid environments and nocturnal activity. The primary habitat requirement for the subspecies is a suitable burrowing substrate of fine sandy soils. LAPM is commonly found in low elevation open grasslands, coastal sage scrub, and alluvial fan sage scrub. The subspecies is recorded to have been observed approximately 2 miles southeast of the study area (CDFW 2012).

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The majority of the project area does not contain suitable habitat for LAPM due to regular disturbance associated with agriculture, and the absence of fine sand soils. Drainage Feature 9, however, is not subject to regular agricultural disturbance and contains Riversidean sage scrub appropriate soils; therefore, this drainage feature contains marginally suitable habitat for LAPM.

MBA conducted surveys for LAPM in 2005, 2010, 2012, and 2013. In 2005, MBA conducted focused trapping surveys for LAPM in the south-central and southeastern portions of the project area. A total of 121 traps were set throughout the drainage features. In 2010, MBA conducted focused trapping surveys in the same location as in 2005 and in two additional drainage features. A total of 122 traps were set among the three drainage features. Only Drainage Feature 9 has suitable RSS and soils, and the other two drainage features only contained suitable soils. The 2012 trapping effort was conducted in the same area as in 2010. No LAPM were trapped. No LAPM were trapped during the focused surveys in any of the three trapping sessions (2005, 2010, 2012, and 2013); therefore, MBA has determined that this species is absent from the project area and no additional trapping is required.

c. Criteria Area Species

The following ten Criteria Area Species were assessed for their potential to occur in the project area:

- Mud nama (*Nama stenocarpum*);
- Little mousetail (*Myosurus minimus apus*);
- Coulter's goldfields (*Lasthenia glabrata* sub. *coulteri*);
- Thread-leafed brodiaea (*Brodiaea filifolia*);
- Davidson's saltscale (*Atriplex serenana davidsonii*);
- Parish's brittlescale (*Atriplex parishii*);
- San Jacinto valley crownscale (*Atriplex coronata notatior*);
- Round-leafed filaree (*Erodium macrophyllum*);
- Smooth tarplant (*Hemizonia pungens laevis*) and
- Nevin's Barberry (*Mahonia nevinii*).

The thread-leafed brodiaea typically occurs on gentle hillsides, valleys, and floodplains in semi-alkaline mudflats; therefore, it is not likely to occur within the WLC planning area.

Most of these species are associated with in highly alkaline, silty-clay soils in association with the Traver-Domino-Willows soil association. In Riverside County, vernal pool plant species are most closely associated with the Willows soil series.

According to the biological assessment, San Jacinto valley crownscale, Parish's brittlescale, Davidson's saltscale, smooth tarplant, Coulter's goldfields, and little mousetail are not likely to occur on the project site due to the absence of vernal pools or vernal pool-like conditions, or alkaline conditions (e.g., alkali annual grassland components of alkali vernal plains or areas that have semi-regular inundation).

The project site does not contain friable clay soils, so round-leafed filaree is not expected to occur. Although small areas of the site contain sage scrub and chaparral vegetation, no alluvial scrub or rocky chaparral slopes occur; therefore, Nevin's barberry is not likely to occur on the project site.

Mud nama is associated with ponds, lakes, or regularly muddy embankments. Since these conditions are not present, it is unlikely this species occurs on the project site.

d. Narrow Endemic Plant Species

The following six Narrow Endemic Plant Species were assessed for their potential to occur on the project area:

- San Diego ambrosia (*Ambrosia pumila*);
- Wright's trichocoronis (*Trichocoronis wrightii wrightii*);
- California Orcutt grass (*Orcuttia californica*);
- spreading navarretia (*Navarretia fossalis*);
- many-stemmed dudleya (*Dudleya multicaulis*); and
- Munz's onion (*Allium munzii*).

As with the Criteria Area species, San Diego ambrosia, Wright's trichocoronis, California Orcutt grass, and spreading navarretia are not likely to occur on the site due to the absence of vernal pools, vernal pool-like conditions, or alkaline conditions (e.g., alkali annual grassland components of alkali vernal plains or areas that have semi-regular inundation). In addition, no clay soils occur within the project area; therefore, many-stemmed dudleya and Munz's onion are not likely to occur.

e. Riparian/Riverine Habitat and Vernal Pools

The project area contains two types of riparian vegetation: mule fat scrub and southern willow scrub. Both plant communities are isolated, disturbed, low in vegetative cover, and generally of poor habitat quality. Three drainage features and one catch basin contain riparian/riverine areas (see previously referenced Figure 4.4.2). One of these drainage features is outside of the project area on the east side of Gilman Springs Road, within one of the proposed debris basins.

The mule fat scrub community on site occurs intermittently within Drainage Feature 9; a small patch within Drainage Feature 7; and within the debris basin associated with Drainage Feature 8. Drainage Feature 9 and the catch basin are both narrow and bordered on each side by disked agricultural fields. Drainage Feature 9 also contains a narrow band of mule fat scrub, but is bordered by relatively undisturbed Riversidean sage scrub. Over time, the drainage feature has fragmented and currently contains isolated patches of riparian vegetation. Within the mule fat scrub community, tree tobacco and other non-native plant species, have established in approximately equal quantity as mule fat.

Drainage Feature 8 has a proposed debris basin across Gilman Springs Road. This small drainage has an area of mule fat scrub that is probably surviving based on the blockage of the drainage at the road. The mule fat scrub portions of the project area are poor in habitat quality due to the small size of the stands, the sparse vegetative cover within the communities, the isolation of the individual stands, and the disturbance from the adjacent agricultural uses. Given the above characteristics, riparian wildlife species have a low potential to occur. Despite the absence of suitable habitat for federally and State listed threatened or endangered species such as least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo that commonly occur in riparian habitat, this drainage feature is considered riparian/riverine areas under the MSHCP because of the presence of mule fat and the subsurface connectivity to off-site riparian areas downstream.

Southern willow scrub occurs in a single isolated catch basin in the project area (Figure 4.4.2, Drainage Feature 14). The catch basin contains marginal vegetative characteristics and no hydrological characteristics that fit the MSHCP description for riverine/riparian areas. It exists as

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isolated, human-made, catch basin that receives nuisance flows and agricultural runoff from concrete cattle containment areas adjacent to the basin, which have subsequently been removed. It is located south of Alessandro Road and does not contain any upstream or downstream connection to any other drainage features. There is no evidence of prolonged ponding within this basin. Due to the high percolation rate, this area does not hold water long enough to provide the necessary hydrology associated with the creation and maintenance of a vernal pool. There are no drainage features that convey natural flows into these basins. Therefore, the basins only source of hydrology is from natural rainfall within the limits of the basin. Vegetation in the catch basin consists of southern willow scrub and includes plant species such as Fremont's cottonwood, black willow, sandbar willow, and mule fat. The plant community primarily consists of a moderate density of trees with a few understory plants.

Southern willow scrub is typically considered suitable habitat for a number of wildlife species that commonly occur in riverine/riparian habitats throughout southern California. These wildlife species include sensitive avian species such as least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. The southern willow scrub associated with Drainage 14 does not contain hydric soils or wetland hydrology indicators. This basin is considered low in habitat quality because it is isolated, small in size, and lacks significant vegetation density. The vegetation within the basin is sparse, with a 30- to 40- percent canopy cover of native willows. The small patch of riparian habitat also contains about 50 percent native willows and 50 percent non-native ornamental trees such as Peruvian pepper tree (*Schinus molle*). The southern willow scrub habitat is 0.86 acre in size (rounded up to 1 acre in the document). There is no suitable habitat for any riparian/riverine avian species, such as least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), due to the limited size of the basin. There is also no suitable habitat within the immediate vicinity (approximately 2 miles) and there is no direct habitat connection to any suitable offsite habitat. Based on these factors, there is no suitable nesting habitat and limited resting habitat for the listed riparian species covered under the MSHCP. Given these characteristics, riparian wildlife species have a low potential to occur.

The term "functioning riparian habitat" describes a patch or area of riparian habitat that functions as a riparian habitat. It provides suitable habitat for plant and wildlife species that are commonly found in riparian habitats. Even low-quality riparian habitat may provide functional riparian habitat if it supports a population of riparian species. The riparian habitat onsite is extremely small and completely isolated from riparian habitat in the eastern portion of the City of Moreno Valley.

The riparian vegetation onsite does not support wildlife species commonly found within riparian habitat such as common yellow-throat (*Geothlypis trichas sinuosa*), yellow warbler (*Dendroica petechia brewsteri*), yellow-breasted chat (*Icteria virens*), and summer tanager (*Piranga rubra*), as described in the Birds as Indicators of Riparian Vegetation (no date) condition in the western U.S. Bureau of Land Management, Partners in Flight, Boise, Idaho. Therefore, even though the WLCSP contains small patches of riparian vegetation, it does not function as a riparian habitat. A few plants in an isolated area do not create a functional habitat.

MBA also conducted a vernal pool habitat assessment within the WLCSP and off-site facilities. As defined by the MSHCP, vernal pools are "seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation, and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season." No vernal pools or ephemeral ponds were observed in the WLCSP or any of the off-site areas during the habitat assessment survey. In addition, no suitable habitat for any fairy shrimp species was identified within any of the project area.

f. Urban/Wildlands Interface Analysis

This section addresses the indirect effects associated with locating development in proximity to MSHCP Conservation Areas. The project area is bordered to the east by Proposed Core 3 (MSHCP Section 6.1.1) and to the south by the SJWA and Existing Core H. Moreover, portions of the project area fall within the boundaries of these Conservation Areas.

The portion of the project area within the SJWA (i.e., Conservation Area) is currently used for agricultural land, but is owned by the CDFW and operated as conservation land as part of the SJWA. No development will occur in this area. The remaining portions of the project area that are on or adjacent to conservation areas will incorporate the design features and measures related to drainage features, toxics, lighting, noise, invasive plants, barriers, and grading/land development discussed below. These measures will make the proposed project consistent with the MSHCP, Section 6.1.4, Guidelines Pertaining to the Urban/Wildlands Interface. A detailed description of recommendations pertaining to an urban/wildlands interface is provided below for adjacency issues identified in the MSHCP. Additional discussion of indirect impacts of the project on the SJWA and Conservation Areas is included in Section 4.4.1.12, *Other Issues*, later in this section. This information is from Section 6.1.4 of the MSHCP, *Guidelines Pertaining to the Urban/Wildland Interface*.

Drainage Features. Development of the project area will include a comprehensive system of storm drains to handle runoff from the proposed project. The project drainage plan shows that drainage from the project area will be directed to the regional storm drain system and away from the adjacent open space, or treated by water quality and retention basins to maintain historical runoff rates and patterns onto downstream land, such as the Mystic Lake area.

The conceptual drainage plan for the WLCSP development consists of a series of collection basins throughout the development that will treat the first flush storm events and convey storm flows to a series of detention basins along the southern boundary of the WLCSP. The basins will be designed to provide a water quality treatment as well as provide an area for creation of riparian habitat. Based on the size of the proposed detention basins, only the inlet and outlet structures will require routine maintenance. This allows the majority of the detention basins to remain undisturbed, which allows for long-term conservation of the riparian habitat. The design, operation, and maintenance of the drainage system for the proposed project will be designed to regulate the discharge of water into any MSHCP Conservation Area under either of these design scenarios.

All development within the project area will be required to obtain a statewide general National Pollutant Discharge Elimination System (NPDES) construction permit for all construction activities associated with the proposed project and will be subject to the County of Riverside's regulations to implement the NPDES program. The NPDES requirements are discussed in greater detail in Section 4.9, *Hydrology and Water Quality*.

Barriers. The WLCSP project will incorporate special edge treatments designed to separate development areas from MSHCP open space areas both to the south and across Gilman Springs Road (i.e., fencing). The Specific Plan indicates that native landscaping and fencing will be installed to minimize unauthorized public access to the south and across Gilman Springs Road, which will also help minimize impacts related to domestic animal predation and illegal trespass and dumping. Impacts to adjacent native areas across Gilman Springs Road will therefore be minimized. In addition, the landscaping palette for the Specific Plan uses native species and precludes invasive plants as shown in the MSHCP invasive species list (MSHCP Table 6-2). The Specific Plan shows a 250-foot setback along the SJWA boundary to the south, as well as walls/fencing and controls on lighting that will comply with the City's new Municipal Code section 9.08.100 to preclude light spillage off site greater than 0.25 foot-candles per square meter. Warehousing will have a minimum 11-foot solid wall along the SJWA boundary with landscaping to soften the appearance and which may eventually provide roosting or nesting opportunities for native birds. There will be no public pedestrian or

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vehicular access from the development onto the SJWA land to the south, and private access to MSHCP areas to the east across Gilman Springs Road will be limited by fencing along private property lines within the project site.

Access. The project will prohibit public access into all MSHCP conservation areas including those contained within SJWA and Existing Core H to the south of the project area. Private access to Proposed Core 3 (Section 6.1.1, Proposed Core 3) to the east of the WLC project area will be limited by fencing of private property limits, but the public may still be able to access these areas from public roads, including Gilman Springs Road.

Grading/Land Development. Project grading will not encroach into conservation land that will be designated as open space located within Existing Core H to the south or Proposed Core 3 (Section 6.1.1, *Proposed Core 3*) to the east of the WLC project area.

Fuels Management. Fuels management focuses on hazard reduction for humans and their property (MSHCP, p. 6-72). According to the Fuels Management Guidelines, for new development planned adjacent to all MSHCP conservation areas or other undeveloped areas, brush management shall be incorporated in the development boundaries and shall not encroach into the MSHCP conservation areas (MSHCP, p. 6-72). Any areas planted with fire-resistant, non-invasive plants must not encroach into the MSHCP conservation area. Accordingly, with implementation of these measures, the WLCSP project will be consistent with the MSHCP Fuels Management Guidelines.

g. Migratory Corridors/Linkages

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

4.4.1.15 MSHCP Conservation Criteria Areas

Figure 4.4.4 shows the location and relationship of the MSHCP conservation areas described in this section, as well as their relationship to the project area.

a. Core 3

NOTE: The following changes have been made due to revision to the Specific Plan project size.

The MSHCP establishes a number of “core” areas that contain or support important biological habitat or species. Some of the core areas are existing reserves, while others are proposed for preservation. This section analyzes the proposed project in relation to the nearby MSHCP core areas. The project area is located within the Reche Canyon/Badlands Area Plan and falls within both the Badlands North Area Plan Subunit and the SJWA/Mystic Lake Area Plan Subunit. No existing or proposed linkage, or constrained linkage areas are in the vicinity of the project. Proposed Core 3 (MSHCP Section 6.1.1) is located to the north and east of the project area and Existing Core H is located to the south (see previously referenced Figure 4.4.3). As shown in Table 4.4.D, portions of the project area fall within 12 Criteria Cells that are all associated with existing or proposed core areas. However, the following

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analysis will show that almost all criteria cells are within the CDFW-owned Conservation Buffer Area and thus will not be directly affected by the development within the Specific Plan. The project also proposes no development within the 74.3-acre Open Space area in the southwestern corner of the Specific Plan.

Table 4.4.D: MSHCP Criteria Cells within the Project Area

Area Plan Subunit within MSHCP	Cell Group	Criteria Cells
Badlands North Area Plan Subunit 3	Cell Group E	1390
	Cell Group X	1297
		1204
San Jacinto Wildlife Area/Mystic Lake Area Plan Subunit 4	Cell Group D	1364
		1370
		1377
		1386
		1389
		1482
		1483
		1477
		1577

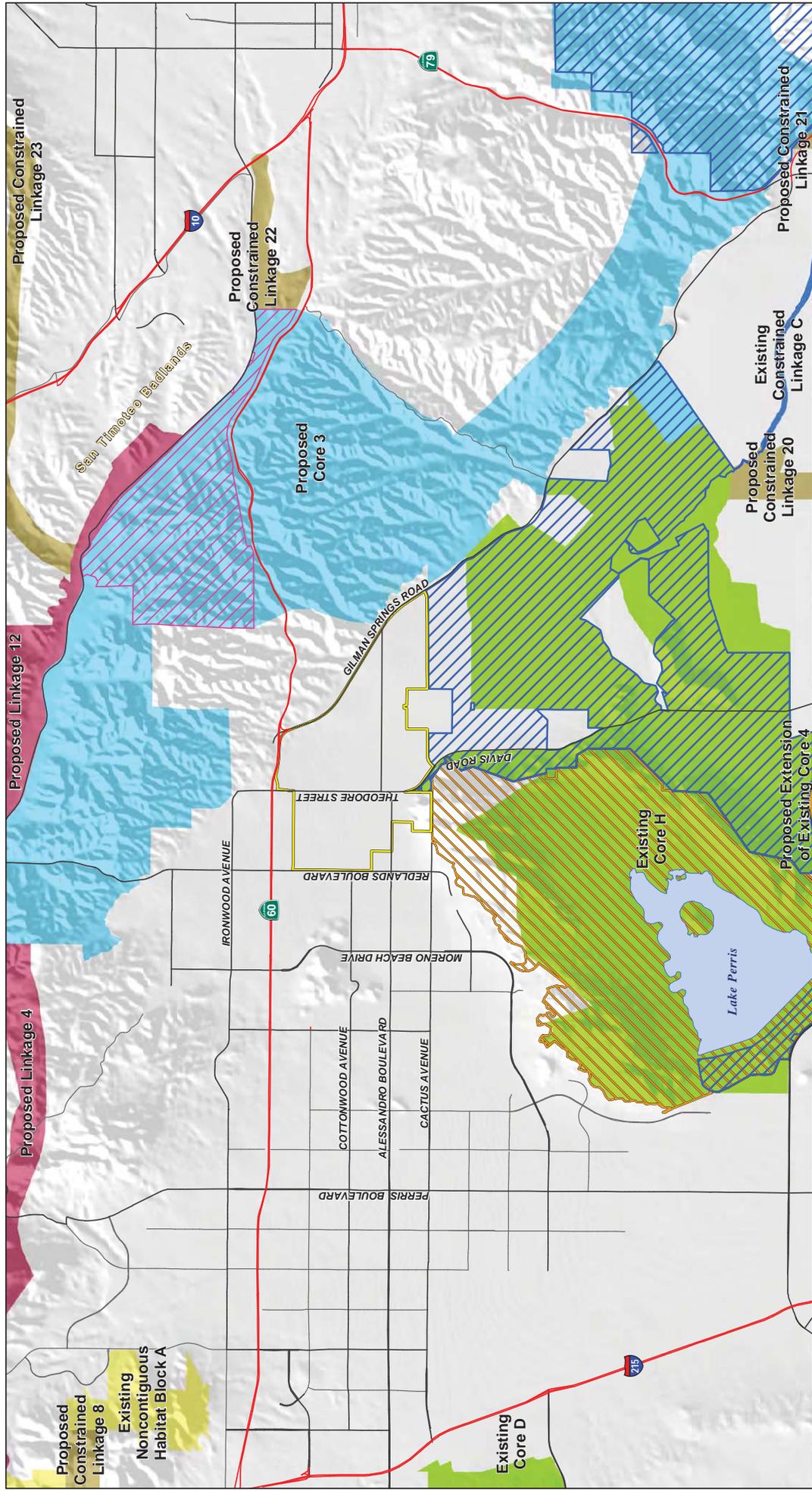
The portions of the project area within Cell Group D are within the SJWA/Mystic Lake Area Plan Subunit 4. This Cell Group supports Existing Core H. Approximately 929 acres of the project area are within Cell Group D. This portion within Cell Group D is located within the SJWA. This area is currently owned by the State of California through a purchase in 2001 and is now designated as Public/Quasi-Public Conserved Land under the MSHCP (see Figure 4.4.3). Although this land is not considered to be mitigation for the proposed development, it does provide more than 900 acres of buffer between the project and the high quality habitat areas of the SJWA.

As shown in Figure 4.4.4, the CDFW-owned portion of the project area overlaps Cell Groups E and X, which are within the Badlands North Area Plan Subunit 3. These Cell Groups support Proposed Core 3. Approximately 52 acres of the CDFW area overlap Cell Group E, and approximately 114 acres of the CDFW Area occurs within Cell Group X. The project will not conflict with MSHCP Conservation Criteria because no development is planned within the CDFW area of the project (which is part of the SJWA). However, any development adjacent to the SJWA will need to address edge effects.

Minimizing edge effects is considered a significant goal of Proposed Core 3. Approximately 56 acres of the project area occur within the western extent of Proposed Core 3. The portions of the Core along Gilman Springs Road are currently subject to edge effects associated with existing traffic, and the development of the project may incrementally increase these edge effects. All development in the southern portion of the project will need to implement measures that minimize edge effects associated with urban development in wildlands. The minimization efforts are addressed in Section 4.4.1.8g, *Urban/Wildlands Interface Analysis*, of this report.

The CDFW-owned land within the project area is located adjacent to the junction of Proposed Core 3 and Existing Core H. Development of the project will not impede the movement of wildlife or reduce the continuous area of the two cores, which are both goals of Proposed Core 3. Additionally, the portion of the project area located adjacent to the Core 3/Core H junction will remain undeveloped, facilitating connectivity between the two Cores.

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LSA FIGURE 4.4.4

- Project Boundary
- Existing Constrained Linkage
- San Jacinto Wildlife Area (CDFW)
- Existing Core
- Lake Perris State Recreation Area
- Existing Noncontiguous Habitat Block
- Norton Younglove Reserve
- Proposed Core
- Proposed Noncontiguous Habitat Block
- Proposed Extension of Existing Core
- Proposed Constrained Linkage
- Proposed Linkage

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The project area occupies less than 0.1 percent of Proposed Core 3 and the goals of the Proposed Core 3 will be maintained.

b. Existing Core H

Existing Core H consists of the Lake Perris State Recreation Area (LPSRA), SJWA, private lands, and lands with pre-existing conservation agreements (see Figure 4.4.4). It provides resident habitat for several species, contains soils suitable for some Narrow Endemic plant species, supports vernal pool complexes and may provide a connection to Core Areas in the Badlands and the middle reach of the San Jacinto River. Maintenance of habitat quality, floodplain processes along the San Jacinto River, and conservation of vernal pool complexes are important for species covered by the MSHCP. The Core Area provides potentially suitable live-in habitat for small rodents and common mammals.

Approximately 113.1 acres of the project area are located within the northern extent of Existing Core H. The CDFW-owned Area in Existing Core H contains potentially suitable habitat for small rodents, common mammals, and burrowing owl. No vernal pool complexes or floodplain conditions occur on the project site and there is no suitable habitat for any narrow endemic plant species. The portion of the project area within Existing Core H will not be developed (i.e., the Conservation Buffer Area) because it is part of the SJWA. The WLC planning area occupies less than 0.2 percent of Existing Core H and the goals of this core area will be maintained.

c. Reche Canyon/Badlands Area Plan

The Reche Canyon/Badlands Area Plan of the MSHCP is in the northern portion of western Riverside County, south of the City of San Bernardino, west of The Pass Area Plan and the San Jacinto Valley Area Plan, north of the Mead Valley Area Plan and the Lakeview/Nuevo Area Plan, and east of the Highgrove Area Plan, the Cities of Norco and Riverside Area Plan, and the March Area Plan. The City of Moreno Valley sits entirely within the Reche Canyon/Badlands Area Plan. The Area Plan incorporates lands within the LPSRA and SJWA, and is separated into 4 Area Plan Subunits. The project area is located within portions of Area Plan Subunit 3: Badlands North and Area Plan Subunit 4: San Jacinto Wildlife Area/Mystic Lake (see Figure 4.4.4).

The target conservation acreage range for the Reche Canyon/Badlands Area Plan is 30,815 to 35,905 acres; it is composed of approximately 20,295 acres of existing Public/Quasi-Public Lands and 10,520 to 15,610 acres of Additional Reserve Lands. The target acreage range within the City of Moreno Valley is 80 to 130 acres. The City of Moreno Valley target acreage is included within the 10,520 to 15,610 acre target conservation range on Additional Reserve Lands for the entire Area Plan.

The Conservation Buffer Area portion of the WLC planning area includes approximately 910 acres of the SJWA, which is designated as Additional Reserve Land. All of this area is within the City of Moreno Valley, and preservation of the Conservation Area of the project will fulfill the MSHCP's target acreage range for the City.

d. Area Plan Subunit 3: Badlands, North

Area Plan Subunit 3 of the Reche Canyon/Badlands Area Plan includes lands within the northeastern and eastern portions of the Area Plan within the Badlands (see Figure 4.4.4). Area Plan Subunit 3 contains a total of 88 Criteria Cells organized into 16 Cell Groups and 4 independent cells. The MSHCP conservation objectives for Area Plan Subunit 3 include conserving land within the Badlands area, north to the vicinity of SR-60, south to southeastern extent of the SJWA, west to the eastern boundary of the SJWA, and east to the Laborde Canyon vicinity. Target acreage range required for

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Additional Reserve Lands within Area Plan Subunit 3 is 8,270 to 10,895 acres. Plant and Wildlife Planning Species within Area Plan Subunit 3 include:

- Nevin's barberry;
- Bell's sage sparrow;
- Cactus wren;
- Loggerhead shrike;
- Southern California rufous-crowned sparrow;
- Los Angeles pocket mouse;
- San Bernardino kangaroo rat;
- Stephens' kangaroo rat;
- Bobcat; and
- Mountain lion.

Under the MSHCP, additional biological issues and considerations are proposed for conservation for each Area Plan Subunit. The biological issues and considerations emphasized in Area Plan Subunit 3 include:

- Conserving large habitat blocks in the Badlands.
- Maintain Core Area for bobcat.
- Maintaining Core and Linkage Areas for mountain lion.
- Determining potential for populations of San Bernardino kangaroo rat along San Timoteo Creek.
- Maintain Linkage Area to SJWA for Stephens' kangaroo rat.
- Determine presence of potential Core Area for Los Angeles pocket mouse in San Timoteo Creek and tributaries to the Badlands.
- Maintain Core Area for Nevin's barberry.

The eastern boundary of the project area (i.e., Gilman Springs Road) is within Area Plan Subunit 3, the main focus of which is protection of bobcat and mountain lion habitat. The portions of the project area within Area Plan Subunit 3 are along the southwestern edge of the Subunit and collectively comprise approximately one percent of the target acreage range proposed for conservation. Since the project area encroaches on a limited portion of the boundary of the Area Plan Subunit, and since these portions of the project area are already subject to existing edge effects, impacts from development under the WLCSP does not conflict with the long-term conservation goals for bobcat or mountain lion habitat. It should be noted that the project site is across a major roadway (Gilman Springs Road) from the Badlands and the sensitive habitat contained in this Area Plan Subunit.

e. Cell Group E and Criteria Cell 1390

Conservation within Cell Group E will contribute to assembly of Proposed Core 3 and will focus on chaparral, coastal sage scrub, grassland, and Riversidean alluvial fan sage scrub habitat. Areas conserved within this Cell Group will be connected to habitat proposed for conservation in Cell Group X to the north, habitat proposed for conservation in Cell Group C also to the north, and to habitat proposed for conservation in Cell Group F to the south. Conservation within Cell Group E will range from 45 percent to 55 percent of the Cell Group focusing in the western portion (see Figure 4.4.4).

Within the westernmost portion of Cell Group E, and specifically within Criteria Cell 1390, the project area encroaches on 51.9 acres. This portion of the project area is already in public ownership, is within the northeastern portion of the SJWA which is Public/Quasi-Public Conserved Land and is

designated to be conserved by the CDFW. The project proposes no development on this land, so it would be consistent with the MSHCP (see Figure 4.4.3). It should be noted that this area is already part of the SJWA and is not proposed for any development under the proposed project.

f. Cell Group X: Criteria Cells 1204 and 1297

Conservation within Cell Group X will contribute to assembly of Proposed Core 3 and will focus on chaparral, coastal sage scrub, and grassland habitat. Areas conserved within Cell Group X will be connected to habitat proposed for conservation in Cell Groups C to the east, V to the northeast, and to chaparral and grassland habitat proposed for conservation in Cell Group E to the south. Conservation within Cell Group X will range from 65 percent to 75 percent of the Cell Group focusing in the northeastern portion of the Cell Group (see Figure 4.4.4).

Within the southwestern portion of Cell Group X, and specifically within Criteria Cells 1204 and 1297, the project area encroaches on 114.2 acres. Under the MSHCP, conservation for Cell Group X is proposed for the northeastern portions of the Cell Group. The project area is not within the targeted conservation areas and, therefore, will not adversely affect the County's ability to achieve the goals of the MSHCP (see Figure 4.4.4).

g. Area Plan Subunit 4: San Jacinto Wildlife Area/Mystic Lake

Area Plan Subunit 4 of the Reche Canyon/Badlands Area Plan includes lands within the southeastern portions of the Area Plan within the SJWA. Area Plan Subunit 4 contains 26 Criteria Cells organized into 3 Cell Groups and 12 independent cells. The MSHCP conservation objectives for Area Plan Subunit 4 include conserving land within the SJWA and Mystic Lake (see Figure 4.4.4). The target acreage range required for Additional Reserve Lands within Area Plan Subunit 4 is 860 to 1,750 acres.

Plant and Wildlife Planning Species within Area Plan Subunit 4 include:

- California Orcutt grass
- Los Angeles pocket mouse
- Smooth tarplant (*Hemizonia pungens*)
- Thread-leaved brodiaea
- Wright's trichocoronis
- Stephens' kangaroo rat
- Loggerhead shrike
- Northern harrier (*Circus cyaneus*)
- Peregrine falcon (*Falco peregrinus*)
- Tricolored blackbird (*Agelaius tricolor*)
- White-tailed kite (*Elanus leucurus*)
- Black-crowned night heron (*Nycticorax nycticorax*)
- California horned-lark (*Eremophila alpestris actia*)
- Coulter's goldfields
- San Jacinto Valley crownscale
- Spreading navarretia
- Vernal barley (*Hordeum intercedens*)
- American bittern (*Botaurus lentiginosus*)
- Burrowing owl
- Bobcat
- Mountain plover (*Charadrius montanus*)
- Osprey (*Pandion haliaetus*)
- Prairie falcon (*Falco mexicanus*)
- White-faced ibis (*Plegadis chihi*)
- Davidson's saltscale (*Atriplex serenana var. davidsonii*)
- Double-crested cormorant (*Phalacrocorax auritus*)

The biological issues and considerations emphasized in Area Plan Subunit 4 include:

- Conservation of alkali playa and other habitat to augment existing conservation in the SJWA and Mystic Lake.

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- Conservation of existing vernal pool complexes associated with the San Jacinto River floodplain in the SJWA and Mystic Lake area. Conservation should focus on vernal pool surface area and supporting watersheds.
- Provide for a connection of intact habitat between the SJWA and the adjacent Badlands to the north.
- Conservation of Willow-Domino-Travers soils supporting sensitive plants such as San Jacinto Valley crownscale, Davidson saltscale, Coulter's goldfields, spreading navarretia, vernal barley and Wright's trichocoronis.
- Provide for and maintain a continuous linkage along the San Jacinto River from the southern to the southeastern boundary of the Reche Canyon/Badlands Area Plan.
- Maintain Linkage Area for bobcat.
- Maintain a Linkage Area for Stephens' kangaroo rat to SJWA.
- Determine the potential presence of potential Core Area for Los Angeles pocket mouse in connection between the Badlands and the SJWA.

The southern portion of the project area (i.e., the CDFW-owned Conservation Buffer Area) includes grasslands and agricultural lands that will be conserved as part of the northern portion of the SJWA. The project area is not within or along the San Jacinto River floodplain, and does not contain any alkali playa habitat or vernal pool complexes under the definition provided by the MSHCP.

There is no Willow-Domino-Travers soil within the project area; therefore, San Jacinto Valley crownscale, Davidson saltscale, Coulter's goldfields, spreading navarretia, vernal barley and/or Wright's trichocoronis are not likely to occur in the project area.

The project area is located immediately north of the Stephens' kangaroo rat preserve within the SJWA. The CDFW-owned portion of the project area adjacent to the SJWA is subject to regular disking and other disturbances associated with agricultural uses. The regular disturbances have resulted in an absence of suitable habitat for Stephens' kangaroo rat within the project area. The presence of a habitat linkage for this species within the project area is unlikely and population fragmentation is not anticipated.

Small portions of the project area contain suitable habitat for Los Angeles pocket mouse and burrowing owl; however, MBA's focused surveys concluded that the project area does not support the Los Angeles pocket mouse. The population of burrowing owl on site fluctuates from year to year, but they have been observed on site in the past and this EIR concludes this species may be present, especially in areas with suitable habitat or where agricultural fields become fallow for extended periods of time.

h. Cell Group D: Criteria Cells 1364, 1370, 1377, 1386, 1389, 1477, 1482, 1483, and 1577

Conservation within Cell Group D will contribute to assembly of areas proposed for conservation for Existing Core H (see Figures 4.4.4 and 4.4.3). Conservation within Cell Group D will focus on agricultural land. Conservation within this Cell Group will be approximately five percent of Cell Group D focused on the southern and western portion of the Cell Group. This cell group is already part of the SJWA and is being maintained as agricultural land by the CDFW (i.e., it constitutes the CDFW-owned Conservation Buffer Area).

Within Cell Group E, and specifically within Criteria Cells 1364, 1370, 1377, 1386, 1389, 1477, 1482, 1483, and 1577, the project area encroaches on 928.5 acres. Under the MSHCP, conservation for Cell Group D is proposed for the southern and western portions of the Cell Group. The project area

includes approximately 60 percent of the northern portion of the Cell Group; therefore, future development of the project area is consistent with the conservation goals for this cell group. The majority of Cell Group D is within the northern extent of SJWA, a Public/Quasi-Public Conserved Land. This area is part of the SJWA and designated as conserved by the CDFW. It is designated as the Conservation Area and is not proposed for development under the project. Any development within land adjacent to Cell Group D (and the SJWA) must incorporate urban edge design features to minimize any potential impacts to the SJWA.

4.4.1.16 Federal Migratory Bird Act and California Department of Fish and Wildlife Protection

a. Nesting Birds

The extensive agriculture plant communities in the project area provide suitable nesting habitat for ground-nesting avian species such as western meadowlark (*Sturnella neglecta*) and burrowing owl. Suitable habitat for shrub and tree nesting species such as red-tailed hawk, black phoebe (*Sayornis nigricans*), and house finch occur along the edges of existing development surrounding the project area as well as isolated, remnant patches of vegetation in undisturbed portions of the project area. Therefore, portions of the project area provide suitable nesting habitat for migratory birds protected under the MBTA and California Fish and Game Code.

b. Stephens' Kangaroo Rat

The project area is located just north of the Core Reserve Area for the Stephen's Kangaroo Rat Habitat Conservation Plan (HCP), but is not located within a core area. However, the project area is located within the fee area of the HCP. The project would have to comply with the HCP's Implementing Agreement (IA) and pay the County's per-acre mitigation fee.

The CDFW-owned portion of the project area is located immediately north of Core Reserve Area for Stephens' kangaroo rat and is not proposed for development as it is owned by the State and is already part of the SJWA. Therefore, incorporating this area into the Core Reserve Area for Stephen's kangaroo rat will provide a setback from the areas proposed for development within the project.

c. USFWS Designated Critical Habitat

No USFWS designated Critical Habitat for any species is present within the project area.

d. Other Special Status Species

Based on the CDFW and CNPS database searches mentioned above, 26 special status species that are not listed as Threatened or Endangered have the potential to occur in the project vicinity (previously referenced Tables 4.4.B and 4.4.C). Species that are not covered under the MSHCP or are not adequately conserved by the MSHCP at this time are also included in those tables.

4.4.1.17 Special-Status Species Not Covered by the MSHCP

The vast majority of special-status species considered in this analysis are "covered" species under the MSHCP. However, 18 special-status species have the potential to occur in the general project vicinity and are not covered under the MSHCP or are not adequately conserved by the MSHCP at this time. Details regarding the potential occurrence of these non-covered species are included in the

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General Biological Resources and MSHCP Compliance Report prepared by MBA and included as Appendix E-1. Due to unsuitable habitat and conditions within the project limits, none of these 18 non-covered species is expected to occur in the project area (see previously referenced Tables 4.4.B and 4.4.C). Neither additional surveys nor additional conservation measures will be required for the project to address these species.

Note: Table 4.4.D has been deleted in its entirety. Please refer to Volume IV of the Final EIR to see original Table 4.4.D in section 4.4.1.17.

a. Special-Status Wildlife

Note: The following changes have been made in response to the revised Habitat Assessment MSHCP Consistency Analysis and in response to Comment F-7A-34 in Letter F-7A from Lozeau Drury LLP.

The revised MBA report (2013) states that no special-status wildlife species were observed during field surveys. However, raptors are numerous in the agricultural fields on the project site and off site in the SJWA. None of the other special-status wildlife species was determined to be present within the WLC planning area because their habitat requirements are not present on the site; therefore, no further survey or study is required to determine likely presence, absence, or to assess project-related effects to these species.

While none of the bat species identified in the MSHCP Compliance Report (Appendix E-1) is expected to roost in the project area, the site does contain suitable foraging habitat for bat species that may roost in the surrounding region. The incremental loss of bat foraging habitat on the site would be compensated by participation in the MSHCP because the MSHCP mitigation fees are meant to purchase conservation lands to support species throughout western Riverside County.

b. Raptors and Other Avian Species

California Fish and Game Code, Sections 3503, 3503.5, 3505, and 3513, and the California Code of Regulations (Title 14, Sections 251.1, 652 and 783-786.6) have specific provisions for the protection of raptors (birds of prey). Furthermore, the MBTA protects the nests of migratory birds and raptors. There are a limited number of tall trees within the project site that would provide roosting or nesting habitat for raptors, such as hawks and owls, among other resident and migratory bird species. Two raptor species, red-shouldered hawk and American kestrel, have been observed in the area on a regular basis, suggesting at least these raptors may be roosting on site or nearby. The extensive open land within the project area provides foraging habitat for raptors and other avian species.

NOTE: The following changes have been made in response to the revised Habitat Assessment MSHCP Consistency Analysis and in response to Comment F-7A-34 in Letter F-7A from Lozeau Drury LLP.

Thirteen species have a low-to-moderate potential to occur on the site based on existing habitat quality. Burrowing owl is assumed to be present on site, especially in areas of suitable habitat and in agricultural fields that are left fallow for extended periods of time.

As previously indicated, the project site is within the MSHCP burrowing owl survey area, and habitat assessments and focused surveys were conducted. During the focused survey in 2005, one location within the project site contained burrowing owl sign (i.e., whitewash and bone fragments) and a pair was observed in this same area. Field surveys also identified suitable burrows in the project area that

may provide habitat for the western burrowing owl. Therefore, the species is considered to be present due to the presence of suitable habitat on site.

To confirm presence or absence of the burrowing owl in specific development areas of the project area, an MSHCP 30-day pre-construction protocol survey for burrowing owl will need to be conducted prior to any ground-disturbing activities. Figure 4.4.5 shows the location of burrowing owl habitat on the project site.

Of the species with potential to occur on the site, none is listed as threatened or endangered under State or Federal law, all are relatively widespread, and the project area does not contain high quality habitat for any of these species.

4.4.1.18 Other Issues

a. Setbacks

The MSHCP's urban/wildlands interface analysis encourages buffers or setbacks between development and areas with sensitive biological resources. The SJWA is considered an important resource due to the large number and diversity of birds that utilize it. Available research and MSHCP guidelines recommend a setback or buffer between the north boundary of the SJWA and the south boundary of development within the proposed project. Existing scientific and academic literature can provide guidance on the appropriate width of such a buffer under these types of conditions. Typical setbacks to protect wildlife from human presence (though not warehousing) ranges from 50 to 500 feet, but 200–250 feet appears adequate for the most sensitive or valuable wetlands.¹ As an example, Placer County has setback guidelines in its General Plan of a setback range of 100–400 feet between field crops and natural areas, and a setback range of 50–200 feet between rangeland/pastures and natural areas². In addition, the MSHCP and adopted guidelines of the USFWS and CDFW include a setback of 200 feet or more from nesting birds during construction activities. For example, typical burrowing owl mitigation says, "To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31) and 160 feet during the non-breeding season."

In evaluating the potential impacts of project development on the SJWA and Mystic Lake, it will be important to consider that the CDFW Conservation Buffer Area was originally purchased by the State to provide a buffer between SJWA/Mystic Lake and future development within the Moreno Highlands Specific Plan (now the proposed project area).

Note: The following information has been excerpted from the Jurisdictional Delineation Report prepared by MBA which was updated in 2014 to respond to comments from the resource agencies.

4.4.1.19 On-site Drainages

A formal jurisdictional delineation (JD) was conducted within the WLCSP and offsite facilities by MBA in September 2007 and again in March 2012. A total of 15 primary drainage features were identified during these combined surveys. A number of sub-drainages or tributaries were also identified. Jurisdiction for each drainage and/or sub-drainage or tributary was evaluated for jurisdiction under Section 404 and 401 of the CWA as administered by USACE and RWQCB, respectively; the Porter Cologne Act as administered by the RWQCB; and Section 1600 of the Fish and Game Code as administered by CDFW.

¹ *Setting Buffer Sizes for Wetlands*. J. McElfish 2008.

² Placer County General Plan, Land Use Element, Table I-4, 1994.

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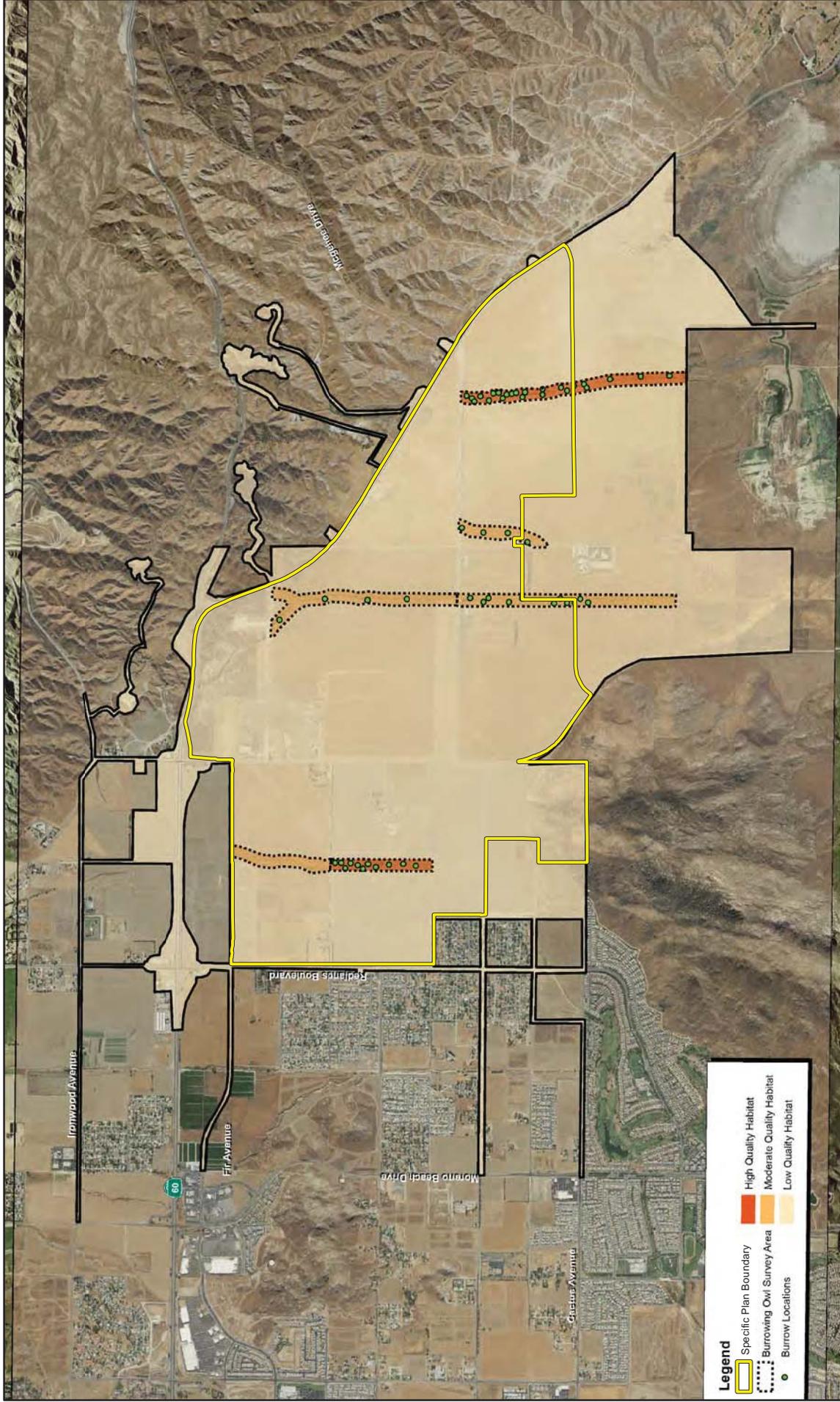
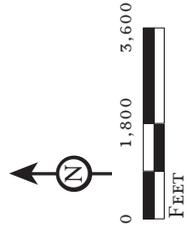


FIGURE 4.4.5

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Based on comments received from the resource agencies, the 2013 JD report concludes that two drainage features (Drainage 12 and 15) have been determined to be jurisdictional waters of the U.S. under Section 404 and 401 of the CWA. Drainage 15 is included in this discussion because it may occur within two offsite utility improvements. Approximately 500 linear feet of the drainage feature was included in the survey area. Approximately 5,430 linear feet of Drainage 12 is included in the survey area (0.5 acres). This includes approximately 1,300 linear feet within the WLCSP, and the remaining 4,130 linear feet will be part of the offsite improvements. The remaining 13 drainage features are considered isolated features with no direct connectivity to downstream traditional navigable waters or have no significant nexus. Drainage features 1, 5, and 6 are roadside ditches that are also isolated features. Drainage features 3, 4, 10, 11, and 13 are upland swales with evidence of periodic erosion but no evidence of annual flows and no clearly defined bed and bank feature. No jurisdictional wetlands were identified within the entire WLCSP. However, the regulatory agencies make all final jurisdictional determinations.

Drainage features 3, 4, 10, 11, and 13 do not have a clearly defined bed and bank feature and do not have any riparian habitat or evidence of flows. These features are better described as upland swales with occasional eroded areas. Under the Porter Cologne Act, the RWQCB takes jurisdiction of drainage features that would normally be under USACE jurisdiction, but are considered isolated. Drainages 7, 8, 9, 12, and 15 were determined to be waters of the state and subject to the jurisdiction of both the CDFW and RWQCB. The jurisdictional limits of waters of the state are not required to have downstream connectivity. There are approximately 3.0 acres of waters of the state, which includes areas with a clearly defined bed and bank feature within the WLCSP and offsite facilities. However, the CDFW makes all final Section 1600 jurisdictional determinations.

Drainage 1: This feature is a roadside ditch that conveys nuisance flows on the east side of Redlands Boulevard. Currently the ditch is contained within a concreted-lined swale and has intermittent areas with an earthen bed and bank. This ditch has no vegetation and leaves the site in an underground storm drain facility. This roadside ditch typically conveys flows during any storm event because most of the drainage is currently paved. This feature does not contribute to the function or value of any downstream drainage features and is not considered a riparian/riverine feature (see Photos 9 and 10).

Drainage 2: This feature is an upland swale that conveys nuisance flows within an actively disked agricultural field and only receives flows every 5 to 7 years. This swale contains periodic sign of erosion, but is mostly an unvegetated swale with minimal evidence of flows. This drainage begins to sheet flow just north of Bay Avenue and has no hydrologic connection to any downstream drainage feature. This feature does not contribute to the function or value of any downstream drainage and is not considered a riparian/riverine feature (see Photos 11 and 12).

Drainage 3: This feature is a temporary detention basin used to treat nuisance flow from the adjacent Skechers logistic facility. The flows within this feature are completely contained within the facility and there is no downstream connection to any other drainage features. This feature does not contribute to function or value to any downstream drainage features and is not considered a riparian/riverine feature (see Photo 13).

Drainage 4: The drainage feature previously originated from an underground storm drain beneath SR- 60. The previous flows from this feature have been redirected into the detention basin associated with Drainage 3. Drainage 4 currently conveys flows from local runoff within the WLCSP footprint and only receives flows every 5 to 7 years. This feature has evidence of a historic channel near the intersection of Dracaea Avenue and Sinclair Street. However, this feature sheet flows just south of Cottonwood Avenue and has no hydrologic connection to any downstream drainage features. This drainage does not contribute to the function or value of any downstream drainage features and is not considered a riparian/riverine feature (see Photos 14 and 15).

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Drainage 5: This drainage is a roadside ditch located along the western side of Theodore Street. This drainage originates at the eastbound Theodore Street off-ramp from SR- 60. This feature conveys nuisance flows from Theodore Street and immediate vicinity during large storm events and may only receive flows every 5 to 7 years. This feature contains an intermittent bed and bank feature, but terminates just north of Alessandro Boulevard. This feature has no hydrologic connection to any downstream drainage. This feature does not contribute to function or value to any downstream drainage features and is not considered a riparian/riverine feature (see Photos 16 and 17).

Drainage 6: This feature is also a roadside ditch located along the eastern side of Theodore Street. This drainage originates from an underground storm drainage beneath SR- 60. It conveys nuisance flow from Theodore Street and immediate vicinity and may only receive flows every 5 to 7 years. This feature contains an intermittent bed and bank feature, but terminates southeast of Alessandro Boulevard within an active agricultural field. This feature has no hydrologic connection to any downstream drainage. This feature does not contribute to function or value to any downstream drainage features and is not considered a riparian/riverine feature (see Photos 18 and 19).

Drainage 10: This drainage is an isolated feature that contains some evidence of erosion and is caused by a change in slope within highly erosive soils. This feature terminates as the topography levels resulting in sheet flows. This feature contains a few scattered tree tobacco, but otherwise has no change in soils or vegetation. This feature has no hydrologic connection to any downstream drainage and may only receive flows every 5 to 7 years. This feature does not contribute to function or value to any downstream drainage features and is not considered a riparian/riverine feature (see Photo 20).

Drainage 11: This drainage is an isolated feature and similar to Drainage 10. This feature contains some evidence of erosion and is likely caused by runoff associated with Gilman Springs Road. This feature terminates as the topography levels resulting in sheet flows. This feature has no hydrologic connection to any downstream drainage and may only receive flows every 5 to 7 years. This feature does not contribute to function or value to any downstream drainage features and is not considered a riparian/riverine feature (see Photo 21).

Drainage 13: This drainage is an isolated feature and similar to Drainage 10. This feature contains some evidence of erosion and is likely caused by runoff associated with the steep hillsides to the south. This feature terminates as the topography levels resulting in sheet flows. This feature has no hydrologic connection to any downstream drainage and may only receive flows every 5 to 7 years. This feature does not contribute to function or value to any downstream drainage features and is not considered a riparian/riverine feature (see Photo 22).

Drainages 1, 2, 3, 4, 5, 6, 10, 11, and 13 do not provide any function or value as drainage features and do not meet the minimum criteria to be designated as Riparian/Riverine areas. All of the above-mentioned drainage features, with the exception of Drainage 13, flow in a north-to-south direction and in a straight-line channel. Drainage 13 flows in a south-to-north orientation. All of these channels terminate as sheet-flow within the WLCSP or immediately offsite and do not reappear further downstream. These features have a parallel flow pattern and are artificially created to minimize flooding impacts to the surrounding agricultural lands within the WLCSP. None of these features has any downstream hydrologic connectivity to any downstream drainage features.

Project components affecting streambed and bank subject to CDFW jurisdiction, including riparian habitat, would require a Streambed Alteration Agreement (SAA) from CDFW.

When impacts are identified during project-specific applications, the proponent will apply for appropriate permits. Mitigation ratios will be determined following standard guidelines and mitigation will include a mixture of onsite habitat creation, offsite habitat creation, or the purchase of offsite mitigation credits at an established mitigation bank. Compensatory mitigation will be no less than a

1:1 replacement ratio to guarantee a no net loss of riparian habitat, but this mitigation ratio is negotiated during permit the acquisition process on a project-by-project basis.

The WLCSP also incorporates a number of potential offsite improvements. All offsite improvements east of Redlands Boulevard may potentially impact drainage features likely considered jurisdictional by USACE, RWQCB, and CDFW. Once these offsite improvements have been finalized, a project specific jurisdictional delineation will be required in order to document the existing conditions, potential impacts, and recommended mitigation measures.

The previous jurisdictional delineation report¹ conducted in 2012 concluded that the project area contained 14 drainage features including four roadside ditches, seven isolated drainage features, and three isolated features. All 14 drainage features lack direct connectivity to any downstream Traditional Navigable Waters (TNWs) or any other Relatively Permanent Waters (RPW). The four roadside ditches lack riparian vegetation and only convey nuisance flows from localized runoff from the adjacent road. These flows eventually revert to sheet flow within the survey area and have no direct connectivity.

According to the previous 2012 report, the three isolated features include an abandoned water quality detention basin and two abandoned basins associated with previous cattle activities. The water quality basin is a temporary facility that was constructed to treat drainage flows resulting from the construction of the Skechers facility. The two isolated basins were previously used to collect polluted runoff from the associated cattle facility. The facility included concrete-lined areas to contain cattle in a dairy operation. Animal waste would be collected in the basins to protect downstream water quality. The livestock facilities have been removed and the basins are no longer functioning.

The 2012 report determined that the on-site features did not meet the minimum requirements to be considered jurisdictional by regulatory agencies due to the following:

- Lack of connectivity to any downstream waters of the US or waters of the State.
- Absence of a consistent bed and bank and/or ordinary high water mark (OHWM).
- Low biological resource value.
- The roadside ditches and agricultural drainages drain only upland areas and do not carry relatively permanent water flows.
- No jurisdictional wetlands occur within the project area.

Important Note. Although the previous JD report from 2012 concluded the onsite drainages were not jurisdictional, the 2013 JD report has amended that conclusion based on comments by the state and Federal resource agencies. The 2013 JD report concludes there are two (2) drainage channels on the WLC site (Drainages 12 and 15) are considered jurisdictional by both Federal and state agencies, while drainages 7, 8, and 9 are considered jurisdictional by the CDFW and the RWQCB. The location and extent of these on-site drainages in relation to the project site are illustrated in previously referenced Figure 4.4.2.

4.4.1.20 NOP/Scoping Comments

Local residents and representatives of several conservation groups related the biological resources of the San Jacinto Wildlife Preserve expressed concern about impacts of the project on the Preserve, including diesel particulates and other air pollutants, noise, night lighting, etc. At least one

¹ *Jurisdictional Delineation Report*, Michael Brandman Associates, April 23, 2012.

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conservation group representative felt that project impacts should be identified for every species present in the area (see Section 2.6.1, *Notice of Preparation*). Copies of NOP comment correspondence is included in Appendix A.

The discussion of potential environmental impacts of the project on biological resources and the MSHCP that was requested by conservation groups has been addressed in previous sections, including indirect effects of diesel air pollutant emissions, lighting, noise, etc.

4.4.2 Existing Policies and Regulations

4.4.2.1 Federal Regulations

Federal Endangered Species Act (FESA). The FESA was enacted to protect any species of plant or animal that is endangered or threatened with extinction. Section 9 of the FESA prohibits “take” of federally threatened or endangered wildlife. Take, as defined under the FESA, means to harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct (16 USC 1532[19]). Section 9 also prohibits the removal and reduction of endangered plants from lands under Federal jurisdiction, and the removal, cutting, digging, damage, or destruction of endangered plants on any other area in “knowing violation of State law or regulation.”

Section 9 of the FESA (16 USC 1538) prohibits take of a federally listed endangered species of fish or wildlife except pursuant to a permit and HCP approved under Section 10(a) of the FESA (16 USC 1539). The FESA prohibitions and requirements are different, however, for endangered species of plants. Section 9 prohibits the take of endangered plants only from areas under Federal jurisdiction, or if such take would violate state law.

Development proposed by the WLC project site is located on private land. For listed plants located on private land, formal consultation with the USFWS is required when a project has a Federal “nexus” (i.e., a Federal permit is required or Federal funding is involved). In the absence of a Federal nexus, a project does not require a permit under the FESA for impacts to listed plants on private lands.

Clean Water Act. The USACE regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria, including a direct or indirect connection to interstate commerce. The USACE regulatory jurisdiction pursuant to Section 404 of the Federal Clean Water Act (CWA) is founded on a connection, or nexus, between the water body in question and interstate commerce. This connection may be direct (through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce) or may be indirect (through a nexus identified in the USACE regulations). The USACE typically regulates as non-wetland waters of the U.S. any body of water displaying an ordinary high water mark (OHWM). In order to be considered a jurisdictional wetland under Section 404, an area must possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic has a specific set of mandatory wetland criteria that must be satisfied in order for that particular wetland characteristic to be met.

In 2006, the United States Supreme Court in the consolidated cases *Rapanos v. United States* and *Caravell v. United States*, Nos. 04-1034 and 04-1384 (*Rapanos*: June 19, 2006) addressed CWA jurisdiction over wetlands adjacent or abutting navigable, non-navigable and ephemeral tributaries and jurisdiction over permanent and relatively permanent non-navigable tributaries. According to the United States Supreme Court, the CWA does not assert jurisdiction over upland erosional features, gullies, and roadside ditches that have infrequent, low volume, and short duration of water flow. The

USACE uses a significant nexus analysis. A water body is considered to have a “significant nexus” with a traditional navigable water (TNW)¹ if its flow characteristics and functions in combination with the ecologic and hydrologic functions performed by all wetlands adjacent to such a tributary, affect the chemical, physical, and biological integrity of a downstream traditional navigable water. Additional information is provided in the Environmental Protection Agency (EPA) memorandum titled “Clean Water Act Jurisdiction Following the U.S. Supreme Court’s Decision in *Rapanos v. United States & Caravell v. United States*,” dated June 5, 2007 (USACE 2007), and also the *U.S. Army Corps of Engineers Jurisdictional Determination Form Instructional Guidebook* (USACE and EPA 2007).

The Regional Water Quality Control Board (RWQCB) is responsible for the administration of Section 401 of the CWA, through water quality certification of any activity that may result in a discharge to jurisdictional waters of the U.S. The RWQCB may also regulate discharges to “waters of the State,” including wetlands, under the California Porter-Cologne Water Quality Control Act.

4.4.2.2 State Regulations

California Endangered Species Act (CESA). The CESA is similar to the FESA in that its intent is to protect species of fish, wildlife, and plants that are in danger of, or threatened with, extinction because their habitats are threatened with destruction, adverse modification, or severe curtailment, or because of overexploitation, disease, predation, or other factors.

“Take” as defined under CESA means hunt, pursue, capture, or kill, or attempt to hunt, pursue, capture, or kill. Under certain conditions, CESA has provisions for take through a 2081 Permit or a Section 2081 Memorandum of Understanding. The impacts of the authorized take must be minimized and fully mitigated. No permit may be issued if the issuance of the permit would jeopardize the continued existence of the species.

California Environmental Quality Act. Section 15380(b) of the *CEQA Guidelines* provides that a species not listed on the Federal or State lists of protected species may be considered rare or endangered if the species can be shown to meet specified criteria. These criteria have been modeled after the definitions in FESA and CESA and § 2780–2781 of Article 1 of the California Fish and Game Code dealing with the California Wildlife Protection Act of 1990. This section was included in the guidelines primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on a species that has not yet been listed by either the USFWS or CDFW.

California Fish and Game Code Section 3503 and the Migratory Bird Treaty Act. Section 3503 of the California Fish and Game Code prohibits the destruction of bird nests except as otherwise provided for in the Fish and Game Code. The MBTA similarly protects the nests of migratory birds. These regulations apply to the individual nests of these species, but do not regulate impacts to the species’ habitats.

Raptor Protection. The California Fish and Game Code (Fish and Game Code, Sections 3503, 3503.5, 3505 and 3513), and California Code of Regulations (Title 14, Sections 251.1, 652 and 783-786.6) have specific provisions for the protection of raptors (birds of prey).

¹ A “traditional navigable water” includes all of the “navigable waters of the United States,” defined in 33 C.F.R. § 329 and by numerous decisions of the Federal courts, plus all other waters that are navigable-in-fact.

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Streambed Alteration Agreements. Sections 1600 et seq. of the California Fish and Game Code define the responsibilities of the CDFW and require public and private applicants to obtain an agreement for projects that would “divert, obstruct, or change the natural flow or bed, channel, or bank of any river, stream, or lake designated by the CDFW in which there is at any time an existing fish or wildlife resource or from which those resources derive benefit, or would use material from the streambed designated by the department.” CDFW wardens and/or unit biologists typically have the responsibility for formulating and issuing Streambed Alteration Agreements. The CDFW, through provisions of the Code (Sections 1601–1603), is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. Streams (and rivers) are defined by the presence of a channel bed and banks, and at least an intermittent flow of water. The CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by the CDFW.

Native Plant Protection Act (NPPA). Sections 1900–1913 of the California Fish and Game Code (Native Plant Protection Act) direct the CDFW to carry out the Legislature’s intent to “... preserve, protect and enhance endangered or rare native plants of this state.” The NPPA gives the California Fish and Game Commission the power to designate native plants as “endangered” or “rare” and protect endangered and rare plants from take.

4.4.2.3 Regional Regulations

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The continued loss of habitat to new development and the cumbersome process of environmental review and habitat mitigation on a project-by-project basis led to preparation of the MSHCP. The MSHCP is a multi-jurisdictional effort that provides a regional conservation solution to species and habitat issues. The underlying goal of the MSHCP is to protect multiple species by preserving a variety of habitat and providing linkages between different habitat areas and other undeveloped lands. The MSHCP allows Riverside County and its cities to better control local land-use decisions and maintain a strong economic climate in the region while addressing the requirements of CESA and FESA. The overall goal of the MSHCP is to enhance and maintain biological diversity and ecosystem processes while allowing future economic growth.

The MSHCP was adopted on June 17, 2003. The MSHCP is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP) focusing on the long-term conservation of species and their habitats in western Riverside County. The MSHCP serves as an HCP pursuant to Section 10(a)(1)(B) of FESA as well as the Natural Communities Conservation Plan (NCCP) under the State of California. The USWFS issued a Biological Opinion for the MSHCP on June 22, 2004. The CDFW also issued the NCCP Approval and Take Authorization for the MSHCP. As long as adherence to the policies and requirements of the MSHCP is maintained, participants in the MSHCP, which include the County of Riverside and fourteen cities (including the City of Moreno Valley), are allowed to authorize “incidental take” of plant and wildlife species of concern.

The MSHCP will eventually result in an MSHCP Conservation Area in excess of 500,000 acres and focuses on conservation of 146 species including amphibians, reptiles, birds, mammals, invertebrates, and plants. The MSHCP Conservation Area includes approximately 347,000 acres on existing Public/Quasi-Public Lands and approximately 153,000 acres of Additional Reserve Land. The MSHCP Plan Area encompasses approximately 1.26 million acres (1,966 square miles); it includes all unincorporated Riverside County land west of the crest of the San Jacinto Mountains to the Orange County line, as well as the jurisdictional areas of the Cities of Temecula, Murrieta, Lake Elsinore, Canyon Lake, Norco, Corona, Riverside, Moreno Valley, Banning, Beaumont, Calimesa, Perris, Hemet, and San Jacinto. It provides a coordinated MSHCP Conservation Area and implementation program to preserve biological diversity and maintain the region’s quality of life.

The MSHCP serves as a HCP pursuant to Section 10(a)(1)(B) of FESA, as well as an NCCP under the NCCP Act of 2001. The MSHCP allows the City of Moreno Valley as well as other signatories of the Plan to authorize “Take” of plant and wildlife species identified within the Plan Area. The USFWS and CDFW have authority to regulate the Take of Threatened, Endangered, and rare Species. Under the MSHCP, the USFWS and CDFW can grant “Take Authorization” for otherwise lawful actions—such as public and private development that may incidentally Take or harm individual species or their habitat outside of the MSHCP Conservation Area—in exchange for the assembly and management of a coordinated MSHCP Conservation Area.

Of the 1.26 million acres covered by the MSHCP, 500,000 acres have been designated for preservation: 347,000 acres are already conserved as public or quasi-public land and another 45,270 acres have been acquired as habitat by the Regional Conservation Authority (RCA). According to the most recent RCA-MSHCP Annual Report, the City of Moreno Valley has a high-end goal of conserving 130 acres within its sphere of influence of the MSHCP; the City has already conserved 943 acres (RCA Annual Report 2010, Table 3). Altogether, Riverside County has reached 77 percent of the goal in the MSHCP.

Stephens’ Kangaroo Rat Habitat Conservation Plan (SKR HCP). The USFWS issued a permit to the Riverside County Habitat Conservation Agency on May 3, 1996, for incidental take of Stephens’ kangaroo rat (*Dipodomys stephensi*). The 30-year plan is designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens’ kangaroo rat occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions (including the City of Moreno Valley), and includes an estimated 30,000 acres of occupied Stephens’ kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied Stephens’ kangaroo rat habitat in 7 Core Reserves encompassing over 41,000 acres. Currently 12,460 acres of occupied habitat exists within the Core Reserves.

4.4.2.4 City of Moreno Valley General Plan Policies

The specific policies outlined in the City’s General Plan Conservation Element related to biological resources include:

Conservation Element

- Policy 7.4.1** Require all development, including roads, proposed adjacent to riparian and other biologically sensitive habitats to provide adequate buffers to mitigate impacts to such areas.
- Policy 7.4.3** Preserve natural drainage courses in their natural state and the natural hydrology, unless the protection of life and property necessitate improvement as concrete channels.
- Policy 7.4.5** The City shall fulfill its obligations set forth within any agreement(s) and permit(s) that the City may enter into for the purpose of implementing the Western Riverside County Multiple Species Habitat Conservation Plan.

4.4.3 Methodologies

The project area was assessed to determine consistency with the MSHCP focusing on conservation of species and their associated habitats in western Riverside County. The Riverside County Integrated Project (RCIP) Conservation Summary Report was first reviewed to determine habitat assessment and potential survey requirements for the study area. Geographic Information Systems (GIS) software was used to map the site in relation to MSHCP areas including Criteria Cells;

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conservation areas and linkages; Criteria Area Species Survey Areas for plant, bird, mammal, and amphibian species; Narrow Endemic Plants Survey Area; and survey requirements for inadequately covered species.

4.4.3.1 Literature Search

Prior to each field visit, a literature review to determine environmental conditions occurring on the study area and the surrounding area was conducted. The primary objective of the review is to evaluate the potential for suitable habitat for sensitive plant and wildlife species, as well as to determine the applicability of other MSHCP and CEQA requirements as they pertain to the proposed project. A compilation of sensitive plant and wildlife species recorded in the vicinity of the study area was derived from the CDFW's California Natural Diversity Data Base (CDFW 2012), a sensitive species and plant community account database. Additional recorded occurrences of plant species found on or near the planning area were derived from the California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California database. The CNDDDB and CNPS search was based on the *Lakeview*, *Sunnymead*, and *El Casco*, California USGS 7.5-minute topographic quadrangles, encompassing 126 square miles. Additional recorded occurrences of these species found on or near the study area were derived from biota studies conducted for the MSHCP as well as studies conducted by MBA biologists for other projects over the years.

The MSHCP and CEQA also require an assessment to determine the potentially significant effects of the project on riparian/riverine areas and vernal pools. According to the MSHCP, the documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species listed in the MSHCP's Section 6.1.2, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools. This assessment is independent from considerations given to waters of the U.S. and waters of the State under the Clean Water Act (CWA) and California Fish and Game Code. This assessment has been completed for all of the study area but not in the zone of potentially indirect effects.

As part of the MSHCP requirements, an Urban/Wildlands Interface Analysis is required to address the indirect effects associated with locating proposed development in proximity to MSHCP conservation areas. The development may result in edge effects, which could potentially affect biological resources within the MSHCP Conservation Area. According to the MSHCP, the analysis should include an assessment of the potential indirect project impacts that may result from drainage features, toxics, noise, invasive species, barriers, access, and grading/development, as listed and described in the MSHCP's Section 6.1.4, *Guidelines Pertaining to Urban/Wildlands Interface*. For this study, the Urban/Wildlands Interface Analysis was extended eastward to include indirect effects adjacent to Gilman Springs Road.

4.4.3.2 Habitat Assessment Survey

MBA originally assessed the planning area in 2005 and has conducted numerous additional surveys since then. Details of the survey dates and specific survey areas are provided in the 2012 MBA report (DEIR Appendix E). The planning area, including the off-site facilities and the CDFW Conservation land, was surveyed to determine the plant communities present, the suitability for Narrow Endemic and Criteria Area plant species, the presence of riparian areas, and the presence of suitable habitat for burrowing owl and Los Angeles pocket mouse. Parameters assessed included soil conditions, presence of indicator species, slope, aspect, and hydrology.

4.4.3.3 Plants

Plant communities were mapped using 7.5-minute USGS topographic base maps and aerial photographs. The plant communities within the planning area were classified according to the CDFW's List of Terrestrial Natural Communities (2003) and cross-referenced to descriptions provided in Holland's Preliminary Descriptions of the Terrestrial Natural Communities of California (1986) and Oberbauer's Terrestrial Vegetation Communities in San Diego County Based on Holland's Descriptions (1996). Common plant species observed during reconnaissance-level surveys in the planning area were identified by visual characteristics and morphology in the field and recorded in a field notebook. Uncommon and less familiar plants were identified off site using taxonomical guides. A list of all species observed on the study area was compiled from the survey data, shown in Appendix A of the MBA 2012 report (DEIR Appendix E).

4.4.3.4 Wildlife

Wildlife species detected during field surveys in the planning area by sight, calls, tracks, scat, or other sign recorded during surveys in a field notebook by all biologists working on the project. Field guides were used to assist with identification of species during surveys. Although common names of wildlife species are fairly well standardized, scientific names are used in this report and are provided in Appendix A of the 2013 MBA report (DEIR Appendix E).

4.4.3.5 Riparian/Riverine and Vernal Pool Habitat

Aerial photography was reviewed prior to conducting general surveys to identify any potential natural drainage features and water bodies that may qualify as riparian/riverine. In general, the surface drainage features indicated as blue-line streams on USGS topographic quadrangle maps that were observed or expected to exhibit evidence of flow, can potentially support riparian/riverine areas. The planning area was evaluated for any riparian/riverine and vernal pool habitat in 2005, 2007, 2012, and 2013.

4.4.3.6 Burrowing Owl

The project site is within the MSHCP burrowing owl survey area, and habitat assessments for burrowing owl (*Athene cunicularia hypugea*) were conducted 2005, 2006, 2010, 2012, and 2013 on various portions of the project site. Areas of suitable habitat, if present, were mapped onto an aerial photograph. Potential owl burrows, such as abandoned small mammal burrows, as well as manmade structures including earthen berms, cement culverts, cement, asphalt, rock, or wood debris piles, or openings beneath cement or asphalt pavement are generally mapped onto an aerial photograph. The site was determined to have suitable habitat in a number of widespread locations, and owls were observed in various locations during the MSHCP fieldwork, so a focused survey was recently conducted in 2013.

A focused western burrowing owl survey was conducted for the proposed project site on seven separate days in 2013. Under the MSHCP, the focused survey protocol was divided into two parts: 1) a Focused Burrow Survey; and 2) a Focused Burrowing Owl Survey. The focused survey was conducted during the breeding season (March 1–August 31) as defined under the MSHCP,¹ and also in accordance with the California Burrowing Owl Consortium's (CBOC) *Burrowing Owl Survey Protocol and Mitigation Guidelines*.² Although the species was not observed during the most recent survey, it has been observed at other times in the past, and is assumed to be present due to the presence of suitable

¹ Western Riverside County Multiple Species Habitat Conservation Plan, Volume I, Dudek & Associates, June 17, 2003.

² Burrowing Owl Survey Protocol and Mitigation Guidelines, California Burrowing Owl Consortium, 1993.

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habitat and the fact they can occupy fallow agricultural fields relatively quickly. The MSHCP requires that pre-construction surveys be completed in areas of suitable habitat.

4.4.3.7 Los Angeles Pocket Mouse

Focused surveys for the Los Angeles pocket mouse (LAPM) (*Perognathus longimembris brevinasus*) were conducted in August 2005, June 2010, June 2012, and July 2013 (see DEIR Appendix E). The surveys were conducted according to the established USFWS protocols for Pacific pocket mouse (*Perognathus longimembris longimembris*), a similar species. The current protocol requires trapping for 5 consecutive nights: conducted when the animal is active aboveground at night, during a new moon phase, if possible. No LAPM were observed in the project area during the focused surveys, but there is marginal habitat located in Drainages 7 and 9. MBA concluded that the project area was not occupied by LAPM. However, future surveys may be needed for development in areas of the site that contain suitable habitat for the project to be consistent with the long-term conservation goals of the MSHCP.

4.4.3.8 Jurisdictional Determination Report

Prior to beginning the field delineation, a color aerial photograph, a topographic base map of the project area and the previously cited USGS topographic maps were examined to determine the locations of potential areas of USACE/CDFW/RWQCB jurisdiction. Potential jurisdictional areas were field-checked for the presence of definable channels¹ and/or wetland vegetation, soils and hydrology. Suspected wetland habitats on the site were evaluated using the methodology set forth in the *U.S. Army Corps of Engineers 1987 Wetland Delineation Manual*² (Wetland Manual) and the *2008 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)*.³ The limits of USACE/CDFW/RWQCB jurisdiction were recorded using sub-meter GPS technology while in the field.

4.4.4 Thresholds of Significance

Based on Appendix G of the *CEQA Guidelines*, biological resource impacts would occur if the proposed project would:

- Have a substantial adverse effect, either directly or indirectly or through habitat modification, on any species identified as endangered or threatened in local or regional plans, policies, or regulations, or by the CDFW or USFWS;
- Have a substantial adverse effect, either directly or indirectly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or the USFWS;

¹ U.S. Army Corps of Engineers. 2008. A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) on the Arid West Region of the United States: A Delineation Manual. ERDC/CRREL TR-08-12: Cold Regions Research and Engineering Laboratory, U.S. Army Engineer Research and Development Center, Hanover NH.

² Environmental Laboratory. 1987. *Corps of Engineers Wetlands Delineation Manual*, Technical Report Y-87-1, U.S. Army Engineer Waterways Experimental Station, Vicksburg, Mississippi.

³ U.S. Army Corps of Engineers. 2008. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region. Ed. J.S. Wakeley, R.W. Lichevar, and C.V. Noble. ERDC/EL TR-08-28. Vicksburg, MS: U.S. Army Engineer Research and Development Center.

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- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native or resident migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

4.4.5 Less than Significant Impacts

4.4.5.1 Adopted Policies and/or Ordinances

Threshold	Would the proposed project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
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Table 4.4.E summarizes the City’s General Plan and Municipal Code policies regarding biological resources and their consistency with the WLCSP.

Table 4.4.E: General Plan and Municipal Code Biological Resources Policies

Goals, Objectives, Policies, Ordinances		Project Consistency
City of Moreno Valley General Plan		
Objective 7.4	Maintain, protect, and preserve biologically significant habitats where practical, including the San Jacinto Wildlife Area, riparian areas, habitats of rare and endangered species, and other areas of natural significance.	No significant riparian or other biologically sensitive habitat is on or adjacent to the study area. The project is consistent with this objective.
Policy 7.4.1	Require all development, including roads, proposed adjacent to riparian and other biologically sensitive habitats to provide adequate buffers to mitigate impacts to such areas.	No significant riparian or other biologically sensitive habitat is on or adjacent to the study area. The project is consistent with this policy.
Policy 7.4.2	Limit the removal of natural vegetation in hillside areas when retaining natural habitat does not pose threats to public safety.	Limited stands of natural plant communities or stands of native vegetation occur in the study area within hillside areas. These areas are proposed as open space under the proposed action. The project is consistent with this policy.
Policy 7.4.3	Preserve natural drainage courses in their natural state and the natural hydrology, unless the protection of life and property necessitate improvement as concrete channels.	The study area contains 14 drainages and/or basins. As specific projects are designed within the WLCSP, consistency with the policy will have to be determined.
Policy 7.4.4	Incorporate significant rock formations into the design of hillside developments.	The study area is generally not a hillside area. Limited natural rock formations occur in a proposed open space area. The project is consistent with this policy,
Policy 7.4.5	The City shall fulfill its obligations set forth within any	See Consistency with Chapter 3.48

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Table 4.4.E: General Plan and Municipal Code Biological Resources Policies

Goals, Objectives, Policies, Ordinances	Project Consistency
	of the City of Moreno Valley Municipal Code below.
City of Moreno Valley Municipal Code	
<i>Title 3 Revenue and Finance</i>	
Chapter 3.48 MSHCP Fee Program (Ordinance 742 Section 1.1, 2007)	Establish a local development mitigation fee to assist in the maintenance of biological diversity and the natural ecosystem processes that support this diversity; the protection of vegetation communities and natural areas within the city and western Riverside County which are known to support threatened, endangered or key sensitive populations of plant and wildlife species; the maintenance of economic development within the city by providing a streamlined regulatory process from which development can proceed in an orderly process; and the protection of the existing character of the city and the region through the implementation of a system of reserves which will provide for permanent open space, community edges, and habitat conservation for species covered by the MSHCP. MBA conducted an MSHCP Consistency Analysis for the proposed project in 2012 and found that the study area is within the MSHCP fee area. Impacts are potentially significant and mitigation is provided.
<i>Title 8 Buildings and Construction</i>	
Chapter 8.60 Threatened and Endangered Species (Ordinance 502 Section 2.1, 1996)	Adopt and require certain implementation measures as required by the Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP), the Section 10(a) Permit and the Management Authorization; and to adopt and impose an impact and mitigation fee to provide funds to the Riverside County Habitat Conservation Authority to implement the terms of the SKRHCP. The study area is located within the known range of SKR. The study area is also located within the SKRHCP fee area and not in the SKRHCP Core Reserve Area. Impacts are potentially not consistent; however mitigation is provided.

Sources: City of Moreno Valley General Plan, 2006; City of Moreno Valley Municipal Code.

This analysis indicates the proposed project is consistent with local policies and ordinances protecting biological resources that apply to the project area. Compliance with State and Federal regulations to ensure protection and preservation of significant biological resources, and the implementation of the MSHCP are the applicable policies/programs that the project must implement. As there are no other local policies or ordinances regarding the protection of biological resources identified by the City or other local jurisdiction applicable to the project site, no impact would occur and no mitigation is required.

4.4.5.2 Habitat Fragmentation/Wildlife Movement

Threshold	Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
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Habitat fragmentation occurs when a single, contiguous habitat area is divided into two or more areas, or where an action isolates the two or more new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or to/from one habitat type to another. Habitat fragmentation may occur when a portion of one or more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat

because of frequent burning. Wildlife movement includes seasonal migration along corridors, as well as daily movements for foraging. Examples of migration corridors may include areas of unobstructed movement for deer, riparian corridors providing cover for migrating birds, routes between breeding waters and upland habitat for amphibians, and between roosting and feeding areas for birds.

The project area contains no significant cover of native plant communities and currently experiences heavy disturbance associated with agricultural activities. Additionally, the project area is adjacent to SR-60 and Gilman Springs Road on the north and east and is bordered by urban development on the west. The nearest linkage area as identified under the MSHCP is Proposed Linkage 5 and is located approximately 3 miles north of the project and approximately 3.6 miles south of the project is Proposed Constrained Link 20. The development of the project area will not impede the movement of any wildlife; therefore, the proposed project will not affect any wildlife movement corridor.

The Conservation Buffer Area located in the southern portion of the project area is owned by the CDFW and currently regularly disked as part of the SJWA's agricultural operations. It currently provides foraging habitat for various resident and migratory wildlife species. The portion of the project area adjacent to the SJWA lands has been actively farmed for decades and is regularly disked. The Conservation Buffer Area is designated as open space in the proposed project and no development is proposed for this area.

Although the project area does not contain any designated wildlife movement corridors or MSHCP linkages (i.e., MSHCP, City General Plan, etc.), it is likely that wildlife moves through adjacent properties such as the SJWA and the Mystic Lake area to the south, the Badlands area to the east and the Lake Perris State Recreation Area to the southwest. The project biological report concluded that development of the project as proposed would not directly have any significant impact on wildlife movement in the area, and would not fragment habitat or adversely affect wildlife movement through the surrounding areas. The biological report also determined that the proposed project would not impede or minimize any significant wildlife corridor for the target species associated within the Reche Canyon/Badlands Area plan, which include Bell's sage sparrow (*Amphispiza belli belli*), cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), loggerhead shrike (*Lanius ludovicianus*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), bobcat (*Lynx rufus*), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), mountain lion (*Puma concolor*), San Bernardino kangaroo rat (*Dipodomys merriami parvus*), Stephens' kangaroo rat (*Dipodomys stephensi*), and Nevin's barberry (*Berberis nevinii*). In addition, although not required, Drainage 9 is being designed to allow for wildlife movement between the Badlands and the SJWA (e.g., relatively natural channel conditions with 50-foot setbacks on either side of the channel through the WLCSP property. These project design features will maintain a wildlife travel path along Drainage 9. Therefore, impacts related to wildlife movement are less than significant, and no mitigation is needed.

4.4.6 Significant Impacts

4.4.6.1 Endangered and Threatened Species

Impact 4.4.6.1: *The project may have significant impacts on listed species.*

Threshold	Would the proposed project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as endangered or threatened in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
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Of the special-status plant and animal species that have the potential to occur within the general vicinity of the project area, 17 plant and animal species are designated as endangered or threatened by State and/or Federal authorities (Table 4.4.F). None of these species was observed or is believed

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to be present on the project site; it is possible the listed birds may utilize the SJWA on a seasonal basis.

Table 4.4.F: Endangered/Threatened Species Within the Project Area

Species	Status Designation	Potential for Occurrence
Munz's onion <i>Allium munzii</i>	Federal: Endangered State: Threatened	Not Expected
San Diego ambrosia <i>Ambrosia pumila</i>	Federal: Endangered State: None	Not Expected
Marsh sandwort <i>Arenaria paludicola</i>	Federal: Endangered State: Endangered	Low
Nevin's barberry <i>Berberis nevinii</i>	Federal: Endangered State: Endangered	Not Expected
Thread-leaved brodiaea <i>Brodiaea filifolia</i>	Federal: Endangered State: Threatened	Not Expected
Slender-horned spineflower <i>Dodecahema leptoceras</i>	Federal: Endangered State: Endangered	Not Expected
Spreading navarretia <i>Navarretia fossalis</i>	Federal: Threatened State: None	Not Expected
California Orcutt grass <i>Orcuttia californica</i>	Federal: Endangered State: Endangered	Not Expected
Vernal pool fairy shrimp <i>Brachinecta lynchi</i>	Federal: Threatened State: Special Animal	Not Expected
Riverside fairy shrimp <i>Streptocephalus woottoni</i>	Federal: Endangered State: Special Animal	Not Expected
Quino checkerspot butterfly <i>Euphydryas editha quino</i>	Federal: Endangered State: Special Animal	Not Expected
California tiger salamander <i>Ambystoma californiense</i>	Federal: Threatened State: Species of Special Concern	Not Expected
Southwestern willow flycatcher <i>Empidonax traillii extimus</i>	Federal: Endangered State: Special of Special Concern	Not Expected
Coastal California gnatcatcher <i>Poliopitila californica californica</i>	Federal: Threatened State: Special of Special Concern	Not Expected
Least Bell's vireo <i>Vireo belli pusillus</i>	Federal: Threatened State: Special of Special Concern	Not Expected
San Bernardino kangaroo rat <i>Dipodomys merriami parvus</i>	Federal: Threatened State: Special of Special Concern	Not Expected
Stephens' kangaroo rat <i>Dipodomys stephensi</i>	Federal: Endangered State: Threatened	Not Expected

Source: MSHCP Compliance Report, Michael Brandman Associates. April 23, 2012 Appendix E-1.

The potential for occurrence determination was based on the results of focused biological resource surveys, and/or the lack of suitable habitat in the project limits for the referenced species. No Federal or State endangered/threatened species were detected on the project site during the focused biological resource surveys. However, to err on the side of caution, it is reasonable to conclude that, at a minimum, indirect impacts to listed species may be significant, and mitigation is required.

Project or Specific Plan Design Features. The proposed World Logistics Center Specific Plan provides for a number of project design features to address the interface between the project and the SJWA. These features include enhanced landscaping along the southern boundary, restrictions on

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site lighting, restrictions on native/drought-tolerant landscape materials, the installation of special drainage facilities, restrictions on public access, special architectural standards for building elevations facing the SJWA, restrictions on the orientation of adjacent buildings, signage restrictions, and other development guidelines intended to create an interface area that is sensitive to the unique relationship between the project and the SJWA.

The Specific Plan establishes a 250-foot wide development setback from the southernmost property line along the SJWA boundary, and an additional 150-foot building setback (i.e., in addition to the setback provided by the CDFW Conservation Area) to help minimize potential impacts on biological resources of the SJWA.

It is important to note that the 910-acre area immediately south of the project was purchased by the State of California largely to serve as a buffer between the habitat area and future development to the north (at that time, the Moreno Highlands Specific Plan). The acquisition of this buffer area created a State-owned 3,000-foot wide separation between the project and the SJWA at that time.

The Specific Plan includes development restrictions that may affect off-site areas such as the SJWA, including architecture and building design, landscaping, and off-site lighting:

- *Architecture and Building Restrictions (Specific Plan Section 4.1)*. Sections 4.1.2 and 4.1.3 require ground- and roof-mounted equipment to be screened from off-site view.
- *Landscaping Restrictions (Specific Plan Section 4.2)*. Section 4.2.4 provides “Special Edge Treatment Areas” in terms of adjacent land uses, including the SJWA (Section 4.2.4.3) and Gilman Springs Road (Section 4.2.4.4).
- *Off-site Lighting (Specific Plan Section 4.3)*. Section 4.3.1 indicates one of the main objectives of the project lighting is “... all lighting in the vicinity of the San Jacinto Wildlife Area shall be designed to confine all direct light rays to the project site and preclude the visibility of direct light rays from the wildlife area” (page 4-42). The project will also have to comply with the City’s new Dark Sky Lighting Ordinance, which reduces spillover light to 0.25 foot-candles at five feet from the adjacent property lines.

The Specific Plan provides for a 250-foot development setback and an additional 150-foot building setback adjacent to the CDFW Conservation Buffer Area. The development setback area would include landscape areas, drainage facilities, site fencing and walls, etc. According to available research previously presented in Section 4.4.1.18a, a 250-foot development setback is adequate for a project-SJWA buffer and is supported by a compilation of available academic and scientific literature and studies on wildlife impacts from diesel emissions, and also the distance established in nesting bird surveys for setbacks from human activity. In addition, the Specific Plan requires solid walls along the property line, which will help provide an additional buffer from building lighting and noise and effectively mitigate potential direct and indirect impacts on the SJWA.

Roadkill. As development occurs within the WLCSP, some local wildlife will be injured or killed by the additional vehicles and trucks on SR-60, Gilman Springs Road, Redlands Boulevard north of Eucalyptus Avenue, and all internal WLCSP roads. There is no accurate way to quantify this impact, since there are no data on existing roadkill on these roadways. However, it is reasonable to assume this impact will increase linearly (from current levels) as project-related traffic increases. It should be noted that development within the Specific Plan along the west side of Gilman Springs Road will be separated from the roadway by fencing or walls as appropriate; this will help restrict human access to Gilman Springs Road and native areas along the east side of the roadway, and may incrementally reduce roadkill along Gilman Springs Road. Native wildlife will still experience incremental adverse impacts from roadkill along Gilman Springs Road as the WLC project develops in the future, but these impacts would be less than significant as long as the County coordinates with the RCA and takes

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wildlife movement between Core H and proposed Core 3 into account when designing and improving Gilman Springs Road.

Operational Noise. The northern portion of the SJWA will experience increased, fluctuating sound levels during construction and operation (e.g., vehicle traffic and truck loading and unloading), but truck traffic and human activity will result in an incremental increase in overall ambient sound over the long term. In addition, it is possible construction activities on the project site, including areas adjacent to the SJWA, may be subject to construction activity on a 24-hour-per-day, 7-day-per-week schedule. The calculations in Table 4.4.G were provided by the project noise consultant (Mestre Greve Associates) specifically for the southern boundary area of the project.

The portion of the SJWA immediately south of the Specific Plan site (i.e., the Conservation Buffer Area) is vacant and regularly disked for dry farming. This area is quiet, with L_{eq} levels during the day of 35.8 dB and nighttime levels of 40.8 dB. Noise levels in this north SJWA area are affected by road noise from Gilman Springs Road to the east and from noise generated at the existing natural gas facilities.

Table 4.4.G: Noise Levels along the Project Southern Boundary

Noise Conditions	Daytime (dB)			Nighttime (dB)		
	L_{min}	L_{eq}	L_{max}	L_{min}	L_{eq}	L_{max}
Warehousing Noise						
50 feet	38.3	48.6	63.1	38.3	48.6	63.1
100 feet	37.5	47.8	62.3	37.5	47.8	62.3
250 feet	34.4	44.7	59.2	34.4	44.7	59.2
500 feet	30.6	40.9	55.4	30.6	40.9	55.4
Warehousing Noise Plus Ambient¹						
50 feet	38.3	49.3	63.1	38.3	48.8	63.1
100 feet	37.5	48.6	62.3	37.5	48.1	62.3
250 feet	35.9	46.2	59.2	34.4	45.2	59.2
500 feet	35.9	43.9	55.4	30.6	42.1	55.4
Change in Ambient Noise Levels²						
50 feet	2.4	8.5	12.8	8.3	13.0	12.0
100 feet	1.6	7.8	12.0	7.5	12.3	11.2
250 feet	0.0	5.4	8.9	4.4	9.4	8.1
500 feet	0.0	3.1	5.1	0.6	6.3	4.3

1 Distances are in feet, noise levels are in dBA.

2 L_{eq} noise added logarithmically, L_{max} and L_{min} will not add in this situation. Highest L_{max} and highest L_{min} were used.

Source: Project noise report and tabular noise data email, Mestre Greve Associates, May 2012.

The noise data in Table 4.4.G indicate that warehousing activity would raise ambient noise levels (measured at 50 feet) by 8 dB during the day and 13 dB at night. If a physical setback or buffer were implemented in this area to reduce impacts such as noise, the project noise consultant has estimated the noise levels for distances from 50 to 500 feet shown in Table 4.4.G.

These calculations show that the increase in noise levels from development would be close to 3 dB at a distance of 500 feet, resulting in overall noise levels (ambient plus development) of 43.9 dB measured at a distance of 500 feet (L_{eq}) during the day and 45.2 dB at 500 feet at night.

In addition to regular background noise contributions from traffic on Gilman Springs Road and the compressors at the SDG&E plant that run 24 hours per day, the SDG&E compressor plant has regular “blow-down” events, which is an automatic pipeline pressure relief process. When these occur, noise levels in the CDFW Conservation Buffer Area adjacent to the compressor plant property lines may reach 130 dB or higher, which is equivalent to a jet plane landing or a train horn at 100 feet. For more information on “blow-down” effects to humans, see Section 4.12, *Noise*, and 4.8, *Hazards and Hazardous Materials*. It should be noted that the pump noise and the blow-down events have been occurring regularly for many years, along with their potential impacts on SJWA wildlife; however, these utility facilities already exist and are not part of any development proposed within the WLC project.

Based on available information, it is reasonable to conclude that increased noise from human activity (project construction, traffic on local roads, loading and unloading of trucks, etc.) related to the proposed project will not have significant impacts on local wildlife in the SJWA area. Available research indicates that increased noise levels near wildlife areas can contribute to behavioral changes such as increased startling in birds, which can be especially harmful during nesting periods, hunting pattern changes or avoidance which decrease habitat value and use, sleep pattern disruption, and decreased overall health from noise stress. These impacts can affect mammals, birds, and other species present within the SJWA. For these reasons, human activity should be set back from the SJWA to help minimize these impacts. The WLCSP indicates there will be a 250-foot minimum development setback and an additional 150-foot building setback along the southern boundary of the Specific Plan area to act as a buffer between the WLCSP and the SJWA. With implementation of the two setback areas (total 400 feet) and proposed solid walls along the SJWA boundary, the anticipated increase in noise from the proposed project will not have a significant impact on wildlife and would not require mitigation.

Construction Noise. Development within the WLCSP and off-site facilities must incorporate landscape elements including trees, shrubs, and groundcover, which would assist in off-site noise reduction. A noise analysis has been prepared for the project to quantify potential short-term and long-term noise impacts that could occur as a result of development of the parcel adjacent to open space areas. Based on recent studies (Landrum and Brown 2012), noise contours would exceed 60 dBA (L_{eq}) roughly 1,000 feet into the CDFW Conservation Buffer Area during construction of the southernmost areas of Phase 2. There is no projected change in noise contours associated with the operation of the facility over those of the no project condition. Therefore, any noise-related impacts would be temporary in nature and generally limited to construction of Phase 2 facilities along the southern boundary of the WLC.

Invasive Species. The WLCSP landscaping palette does not include any of the invasive plant species listed in Section 6.1.4 of the MSHCP (Table 6-2), but there should be mitigation to ensure that no on-site landscaping along the southern boundary of the site conflicts with MSHCP invasive plant guidelines.

Lighting. Lighting associated with planned warehouse development of the eastern and southern portions of the WLCSP would have various direct and indirect impacts on local wildlife, depending on the species and the nature of light exposure. There is some scientific and academic research on the effects of night lighting on various species, even though the subject species and lighting conditions vary widely. This section generally compares the results of this research to the relationship of the project and the SJWA.

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Some available research¹ states that night lighting can have a wide range of adverse effects on wildlife, including mammals, birds, bats, amphibians, insects, fish, even plants. Effects range from reduced health by upsetting diurnal rhythms, reduced clutch size, egg size, or survival success of nesting birds, to actual mortality from increased predation under higher ambient light levels. Bats and certain insects are also attracted to outdoor night lighting, which may adversely affect their survival or cause them to become dependent on the lighting. Small mammals would also be attracted to these areas and might suffer increased predation or roadkill crossing streets.

Future development within the Specific Plan will have to comply with the off-site lighting restrictions outlined in Section 4.3 of the Specific Plan, including the requirement that direct light rays from all lighting fixtures be directed downward, illuminate only the building or space intended, and do not spill onto adjacent properties (Section 9.08.100 Lighting 5.5.2.1). This will also apply to project-related development in Planning Areas 10 and 12, which will help minimize lighting impacts on biological species in the adjacent SJWA land.

All on-site lighting will also have to comply with the new night lighting guidelines in Section 9.08.100 of the City's Municipal Code, which limits off-site impacts to 0.25 foot-candles per square meter. As development occurs within the Specific Plan, adherence to these design guidelines and restrictions will help ensure that night lighting increases will not result in significant indirect lighting impacts on native wildlife within the SJWA.

For example, the Specific Plan requires that streetlights, parking lot lighting, and other project-related illumination sources be positioned, directed, and shielded to avoid "direct light spill" into MSHCP conservation areas including those contained within Existing Core H to the south of the project area, and Proposed Core 3 (Section 6.1.1, Proposed Core 3) to the east of the project area. Lighting installed according to the WLC Specific Plan will be consistent with MSHCP guidelines. The project will also have to comply with the City's new Dark Sky Lighting Ordinance, which reduces spillover light to 0.25 foot-candles at five feet from the adjacent property lines. However, due to the size of the WLC project and its proximity to the SJWA, additional mitigation may be necessary for cumulative lighting impacts on the SJWA.

In addition to night lighting issues associated with construction and operation, the proposed facilities are to include roof-mounted photovoltaic panels to provide electricity for the facilities and aid in the sustainability of the project and reduce additional GHG emissions. There is a potential for glare from these panels to confuse migratory birds into attempting to land in the area of the panels. However, the project design calls for the use of low glare and high solar transmission films to increase solar capacity and prevent unnecessary glare, so this impact would be less than significant.

Toxics, Water. Development plans for the project will include Water Quality Best Management Practices (BMPs) such as vegetated earthen channels, storm drain stenciling, street sweeping, and education. The BMPs recommended for the proposed WLCSP are described in more detail in Section 4.9.6.1, *Construction-Related Water Quality Impacts*, and Section 4.9.6.2, *Operational Water Quality Impacts*. (Detention basins will be designed to filter potential toxics from storm water. Section 4.9.6.2, *Operational Water Quality Impacts*, also requires the regular removal of any contaminated materials from the detention basins to protect downstream water quality.) These BMPs will be implemented as part of the storm water pollution prevention measures for the project, in accordance with all appropriate NPDES requirements.

Development of the project will result in the additional use of hazardous materials in limited quantities associated with normal logistics use such as janitorial and cleaning products, solvents, herbicides,

¹ *Ecological Consequences of Artificial Night Lighting*. C. Rich and T. Longcore (ed), 2006.

and insecticides. However, compliance with regulations, standards, and guidelines established by the Environmental Protection Agency (EPA), State, County, and local agencies relating to the storage, use, and disposal of hazardous waste will reduce the potential risk of hazardous materials exposure.

Development plans for the project will include Water Quality BMPs such as vegetated earthen channels, storm drain stenciling, street sweeping, and education. Detention basins will be designed to filter potential toxics from storm water. These BMPs will be implemented as part of the storm water pollution prevention measures for the project, in accordance with all appropriate NPDES requirements.

Toxics, Air Pollution and Diesel Exhaust. Local wildlife (i.e., within the SJWA) may be exposed to vehicular exhaust and diesel particulates and toxic air contaminants from truck exhaust as the project builds out. New development will produce significant amounts of diesel-related air pollutants that will be released into the atmosphere, including gases and particles of various sizes.

Most of the available (and most applicable) research is on diesel pollutant impacts on humans. Although the physiology of many animals is very different than humans, data on health effects from diesel pollution may nonetheless be somewhat instructive when attempting to assess diesel impacts on wildlife. Potential health effects on wildlife obviously depend on the species involved,¹ but in general health effects from air pollution/diesel exhaust include impaired cardiac and lung or respiratory function,² reduced heart function or longevity, decreased clutch size or hatching success, increased incidence of cancer and other mutagenic or teratogenic effects, ingestion of air deposited particulates, reduction in overall biodiversity, reproductive failure, etc. In general, impacts on higher animals are most commonly attributed to food loss and reproductive effects, rather than to direct toxic effects on adults. There are relatively few examples of higher animals suffering direct toxic effects from either atmospheric acidity or gaseous air pollution. However, a number of mammals are known to build up high levels of heavy metals and other pollutants in their systems from air pollution.³

Diesel emissions⁴ contain thousands of pollutant species, and the composition depends on the fuel, vehicle, and driving conditions. The main public health concerns are from fine and ultrafine particulate matter, black or elemental carbon, polyaromatic hydrocarbons (PAHs) like phenanthrene, metallic ashes, gases like nitrogen dioxide, aldehydes like acetaldehyde, acrolein, and crotonaldehyde, volatile organic compounds like benzene and 1,3-butadiene, etc. One of the research limitations is that some health effects from these pollutants take a long time, in some cases even a lifetime, to exhibit themselves. These pollutant species can also be emitted from other sources, so in complex urban environments, it can be difficult to trace individual sources of air pollution. In this case, air quality is relatively good and the only major activity is agriculture, so the increase in most of these pollutant species would predominantly be the result of new warehouse uses within the project. Research⁵ suggests that wildlife may be more susceptible to air pollutant impacts than humans, due to their smaller size, higher respiration rates, smaller lung capacities, ingestion of local plant materials that have also been exposed, higher metabolic rates, etc., although some factors like shorter lifespans would reduce the length of exposure over time. For these reasons and for the purposes of this analysis, it is assumed that animals within the SJWA would be at least as susceptible to health effects from air pollution, including diesel exhaust compared to humans.

¹ "Air Pollution and Biodiversity: A Review." 1995.

² "Cardiovascular and thermoregulatory responses of unrestrained rats exposed to filtered or unfiltered diesel exhaust." C. Gordon et al, Inhalation Toxicology, 2012.

³ Ibid.

⁴ "Diesel Emissions, Toxics, and Health Implications." M. Costantini, 2006.

⁵ "Exhausted by Diesel." NRDC 1998.

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In 2002, the EPA compiled a wide range of scientific studies on the health effects of diesel exhaust, including non-carcinogenic effects¹ of diesel exhaust on laboratory animals. Studies found that diesel particulate matter (diesel PM) had a limited effect on the survival and growth of rats and mice when exposed to diesel PM for short periods of time. However, rats, mice and hamsters all experienced increased lung to body-weight ratios when exposed to 1.5 mg/m³ diesel PM concentrations for extended periods of time. Several studies looked at behavior effects in animals, and found that juvenile rats exposed to diesel emissions (DE) exhibited a decreased ability to move around on their own, and negatively affected their learning in adulthood.

Extended exposure to diesel emissions caused negative effects on the pulmonary functions of rats, hamsters, cats and monkeys. Depending on the species, DE levels of 1.5–11.7 mg/m³ affected lung mechanical properties, diffusing capacity, lung volumes, and ventilator performance of the subject animal. The ability of rats to clear their airways was also severely impaired by diesel PM concentrations of 1 mg/m³ or greater. Data on the effect of diesel PM on airway clearance in other animals were limited, but the pathological effects of diesel PM seemed to be dependent on the relative rates of pulmonary deposition and clearance (rate of breathing) of the subject animal. The studies also showed that diesel PM can reduce an animal's resistance to respiratory infections. Diesel PM can begin to impair an animal's immune system in as little as 2–6 hours with exposures of 5–8 mg/m³ of diesel PM. The testing data also suggested that diesel PM may be a factor in increased allergic reactions in animals.

When comparing filtered versus non-filtered DE, studies found that diesel particulates are the main cause of noncancerous health effects. However, they could not determine if diesel PM acts additively with the gas, or whether it combines with the gases to create different effects. The studies also found that other airborne contaminants (e.g., criteria pollutants) can be altered by diesel PM when absorbed by the diesel particles and increase the physical health effects caused by the diesel PM and other contaminants. These increased health risks were only found in laboratory settings. There was no evidence for DE interacting with other contaminants in normal urban atmospheric settings except for the impaired ability of animals to resist respiratory tract infections. No other noncancerous effects were found in any of the studies.

Chapter 7 of the EPA document includes studies that concluded diesel emissions also have carcinogenic effects on animals. Studies indicated that DE and/or diesel PM did result in increased cases of cancer in laboratory animals as well as humans. Rats experienced a trend of increased tumor growth when exposed to concentrations of DE exceeding 1×10⁴ mg × hr/m³. Because tumors were induced at high concentrations it is believed that they are caused by the lungs experiencing particle overload. The studies also examined the effect of filtered exhaust and discovered that it did not cause tumors. They concluded that filtered exhaust either was not a carcinogenic or had low cancer potency.

In addition to pollutants associated with diesel trucks, passenger vehicles produce additional air pollutants including carbon monoxide, nitrogen oxides, particulates,² etc. These pollutants will also have indirect impacts on wildlife resources of the SJWA. Two impacts of most concern would be ozone degradation (e.g., plants having an unusual dry or “burned” look) and the deposition of additional nitrogen, both of which can disrupt plant growth cycles.

Direct air pollutant impacts on wildlife within the northern end of the SJWA will be reduced somewhat because prevailing winds are mainly to the southeast with the remainder mostly to the east (i.e., very little to the south), based on data from the project air quality study (MBA 2012). However, some diesel

¹ “Health Assessment Document for Diesel Engine Exhaust.” United States EPA. March 2002.

² “Pulmonary and cardiovascular of traffic-related particulate matter from roadside and diesel engine exhaust particles.” M. Gerlofs-Nijland et al. *Inhalation Toxicology*, 2010.

and other project-related air pollutants will still be expected to disperse toward the SJWA, including gases and particulates, from trucks and passenger vehicles, when prevailing winds are absent.

There appears to be little academic or scientific research on the specific impacts of diesel air pollutant emissions on wildlife (i.e., not laboratory animals) in natural settings, or specific setbacks for wildlife protection areas from warehouse distribution centers or other sources of diesel pollution. Most available research is too limited or specific regarding the type of pollutant and/or the species considered to be affected (e.g., impacts of one pollutant on one species). The portion of the SJWA adjacent to the WLCSP property is upland agricultural fields which may be used by foraging birds. Indeed, the northern portion of the SJWA land serves as an existing buffer and it was acquired by the CDFW in 1994 for that purpose. Additional buffer areas imposed as mitigation are discussed below.

Based on available scientific data, it is reasonable to conclude that the proposed project, due to its size and expected amount of truck traffic, will have potentially significant impacts on wildlife within the SJWA and east across Gilman Springs Road from project air pollution, including diesel truck exhaust.

Research by the California Air Resources Board (CARB)¹ indicates that 80 percent of the particulates generally settle out of the atmosphere within 1,000 feet of emission sources. Therefore, diesel particulate deposition may occur within approximately 1,000 feet of truck activities within the project, which would extend part way into the CDFW Conservation Buffer Area. This demonstrates one benefit of the State acquiring this Conservation Buffer Area (i.e., to reduce potential impacts of future development to the north from the SJWA and Mystic Lake to the south). In addition, the Specific Plan establishes an additional 250-foot setback along the SJWA boundary, which provides additional buffering from potential air pollutant impacts.

Toxics, Health Risk Assessment. A Health Risk Assessment (HRA) (MBA 2012) was completed for the project primarily prepared for human health risks associated with airborne hazards. An HRA is a guide that helps to determine if current or future exposure to a chemical or substance could affect the health of a population. The State of California Office of Environmental Health Hazard Assessment (OEHHA) develops methods for conducting health risk assessments. As defined under the Air Toxics “Hotspots” Information and Assessment Act of 1987 [“AB 2588” (Chapter 1252, Statutes of 1987), California Health and Safety Code Section 44306], “A health risk assessment means a detailed comprehensive analysis prepared pursuant to Section 44361 to evaluate and predict the dispersion of hazardous substances in the environment and the potential for exposure of human populations and to assess and quantify both the individual and population-wide health risks associated with those levels of exposure” (Office of Environmental Health Hazard Assessment 1987).

The HRA of toxic air contaminants builds upon the assessment methodology described above but requires one additional step beyond that for *assessment* of the local pollutants. This step involves applying a risk characterization model to the results from the air dispersion model to estimate potential health risks at each sensitive receptor location.

Table 4 in the HRA (MBA 2012) provides a discussion on the air pollutants that could potentially be present as a result of the construction and/or operation of the proposed facilities and the most relevant effects from pollutant exposure to humans. No standards for impacts to wildlife have been established. Since air is not stationary, there is a potential that air quality concerns associated with the project will not be confined to the project site itself and thus would disperse into “wildland” areas. The primary wind direction near the project site is to the southeast, as shown in Exhibit 5 in the HRA (MBA 2012). The wind direction would send any air hazards toward the Badlands MSHCP Criteria Cells and points to the east across Gilman Springs Road.

¹ *Air Quality and Land Use Handbook*. CARB and EPA. 2005.

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Health risks within the context of this analysis are represented as the increase in cancer risk associated with exposure to diesel particulate matter emissions from project operations. These diesel particulate matter emissions arise from both exhaust and idling of diesel trucks while operating on and near the project site. The methodology applied in calculating cancer risk from diesel particulate matter has been published by the SCAQMD and the California OEHHA.

The methodology basically assumes that a person is exposed continuously to a project's emissions for a period of 350 days per year, 24 hours per day over a 70-year lifetime period. In this regard, cancer risk is expressed as the probability of an individual developing cancer due to exposure to diesel particulate matter emissions at the above-referenced durations from the project, out of a population of 1 million individuals. Thus, a receptor calculated to have a cancer risk of 1 in one million means that this receptor has a probability of 1 in 1 million of developing cancer from the continuous exposure to diesel particulate matter. The SCAQMD has established a significance threshold of 10 in 1 million for cancer risk attributable to exposure to a project's emissions. No such threshold exists for wildlife and a number of factors vary from the criteria established for human populations. The average life of migratory waterfowl ranges from 10 to 20 years. This might represent the most long-lived of the species in the vicinity of the project site. These species are also not present year round and may spend as little as 100 days in the project area on the SJWA.

Specific Plan Design Features. The Specific Plan requires a 250-foot development setback and an additional 150-foot building setback along the southern boundary of project development and the CDFW Conservation Buffer Area. In addition, the Specific Plan calls for native landscaping in the setback area and a wall along the north side of the 250-foot setback zone. The separation between planned development along the east side of Gilman Springs Road will be set back from the roadway. This setback, plus the width of the roadway and related shoulder areas, will be sufficient to separate the proposed project from the MSHCP criteria cell areas east of Gilman Springs Road, so no additional setback is needed in that area.

Mitigation Measures. The following measures are proposed to mitigate potential direct and indirect impacts to listed species due to the project's proximity to the SJWA site, even with the presence of the CDFW Conservation Buffer Area:

4.4.6.1A All Plot Plan applications within Planning Areas 10 and 12 (i.e. adjacent to the San Jacinto Wildlife Area as shown in Final EIR Volume 2 Figure 4.1.6B) shall provide a 250-foot setback from the southerly property line. Permitted uses within this setback area include landscaping, drainage and water quality facilities, fences and walls, utilities and utility structures, maintenance access drives, and similar related uses. No logistics buildings or truck access/parking/maneuvering facilities are permitted in this setback area.

In addition, logistics buildings within Planning Areas 10 and 12 may not be located within 400 feet of the southerly property line. All development proposals in Planning Areas 10 and 12 shall include a minimum six-foot tall chain link fence or similar barrier to separate warehouse activity from the setback area. This fence/barrier shall have metal mesh installed below and above ground level to prevent animals from moving between the development area and the setback area.

Within Planning Areas 10 and 12, all truck activity areas adjacent to the 250-foot buffer area along the southern property line shall be enclosed by minimum 11-foot tall solid walls to reduce noise and lighting impacts on the adjacent property. This measure shall be implemented to the satisfaction of the Planning Official.

A preliminary landscape plan for the 250-foot setback area shall be submitted with all Plot Plan applications for lots adjacent to the California Department of Fish and Wildlife property. Precise landscape plans shall be submitted with any grading permit for said lots and must be approved prior to the issuance of any building permit on said lots. The landscape plan shall be prepared by a licensed landscape architect in consultation with a qualified biologist and shall be consistent with the design standards contained in the World Logistics Center Specific Plan. No plant species listed in Section 6.1.4 of the Western Riverside County Multiple Species Habitat Conservation Plan shall be installed within the setback area. Cottonwood trees shall be planted within the setback area consistent with the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development Division Manager.

4.4.6.1B Each Plot Plan application in Planning Areas 10 and 12 shall provide runoff management and water quality facilities adequate to minimize downstream erosion, maintain water quality standards and retain pre-development flows in a manner meeting the approval of the City Engineer. All drainage improvements shall be designed to minimize runoff and erosional impacts on adjacent property. This measure shall be implemented to the satisfaction of the Land Development Division Manager of Public Works.

The 250-foot setback identified in **Mitigation Measure 4.4.6.1A**, and the presence of the CDFW Conservation Buffer Area, will effectively mitigate potential indirect impacts of air pollutants, including diesel particulate matter, on wildlife within the SJWA. Compliance with the off-site lighting guidelines of the Specific Plan, compliance with the night lighting standards in Section 9.08.100 of the City Municipal Code, and implementation of Aesthetics **Mitigation Measure 4.1.6.4A** will help reduce lighting impacts on the SJWA to less than significant levels

In addition, **Mitigation Measure 4.4.6.2A** will help assure that potential impacts to listed or sensitive plant species remain at less than significant levels.

Level of Impact After Mitigation. Compliance with the Specific Plan, Municipal Code, and implementation of the recommended **Mitigation Measures 4.4.6.1A** and **4.4.6.1B** will help reduce project impacts to listed species to less than significant levels.

4.4.6.2 Adopted Habitat Conservation Plans

Impact 4.4.6.2: *Implementation of the project may conflict with portions of the MSHCP for Western Riverside County.*

Threshold	Would the proposed project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?
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The project site is subject to the provisions of two HCPs: the SKR HCP and the MSHCP. Impacts related to these HCPs are discussed in this section.

a. Stephens’ Kangaroo Rat Habitat Conservation Plan

The project site is within the SKR HCP Fee Area. The SKR is relatively widespread throughout the SKR HCP Fee Area, but the main blocks of occupied habitat are concentrated in several Core Areas that must be conserved. The proposed project site is not within an SKR Core Area. The SKR also requires species-specific monitoring and management to ensure its long-term viability in the SKR HCP, including tracking population densities and maintaining sparse, open grassland habitats.

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The long-term SKR HCP provides Take Authorization for the SKR within its boundaries. The core reserves established by the SKR HCP will be managed as part of the MSHCP Conservation Area consistent with the provisions of the SKR HCP. Focused surveys for Stephens' kangaroo rat will not be required for this project because the project lies within the SKR Fee Area; therefore, no requirements under the SKR HCP other than payment of a local mitigation fee are required.

b. Summary of Western Riverside County Multiple Species Habitat Conservation Plan Impacts

The project area is located within the Reche Canyon/Badlands Area of the MSHCP. Development of the project area would not conflict with the conservation goals established by the MSHCP for Cell Group X or Cell Group E. In addition, no conflict from development would occur in relation to the Reche Canyon/Badlands Area Plan, the Area Plan Subunit 4, the Area Plan Subunit 3, Proposed Core 3, or Existing Core H.

The WLCSP and the proposed offsite facilities occur immediately adjacent and within the vicinity of Core H and proposed Core 3. RCA staff commented that they believed any increase in truck traffic associated with the proposed project along Gilman Springs Road could significantly affect wildlife movement between Core H and proposed Core 3 and requested mitigation to offset those impacts. However, the appropriate mitigation for increased traffic on Gilman Springs Road is payment of the project's fair share of the improvements to Gilman Springs Road, including provisions for wildlife movement or crossings. The design and improvement of Gilman Springs Road is a County project that is not under the control of the project applicant.

No development is proposed within the portion of the project area that lies within Cell Group D and the SJWA. This area is already owned by the State and managed by the CFDW. However, development that will be adjacent to the SJWA property may cause significant indirect impacts to species within the SJWA, which will require mitigation (i.e., designing an appropriate buffer along this "urban edge" will help minimize potential impacts on the SJWA).

The project area is not adjacent to any Cores or Linkages identified in the MSHCP. However, it is adjacent to the SJWA and is subject to the project guidelines provided in MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface). The project is also required to adhere to the Best Management Practices (BMPs) found in Appendix C of the MSHCP.

The project does not propose to alter land use in any way that would adversely affect Cores, Linkages, or Reserve Assembly within the Reche Canyon/Badlands Area Plan.

The project is not located within any Amphibian, Mammalian, or Special Linkage Areas identified by the MSHCP. The project is in an area requiring burrowing owl surveys, is within the MSHCP Criteria Area Species Survey Area (CASSA), and is within the Narrow Endemic Plant Species Survey Area (NEPSSA).

The MSHCP and its Implementation Agreement contain a fee mitigation program pursuant to which local agencies collect development impact fees and remit such fees to the Riverside Conservation Authority (RCA). These fees are in turn used to acquire lands that are suitable for habitat preservation for species covered by the MSHCP. Payment of the local MSHCP mitigation fee will be required of the project prior to the issuance of building permits.

From available information, potential indirect impacts to avian and other biological resources within Mystic Lake and the SJWA will be reduced to less than significant levels by the creation of a 250-foot on-site setback or buffer area in **Mitigation Measure 4.4.6.1A**, which will be in addition to the existing

setback provided by the CDFW Conservation Buffer Area just south of the proposed development area.

Participation in the MSHCP and contribution of MSHCP provides compensation for the loss of raptor foraging habitat due to approved projects. Typically, a project proponent would participate as outlined in the MSHCP, so that loss of raptor foraging habitat is typically considered to be less than significant and no mitigation is required.

Narrow Endemic Plant Species. No Narrow Endemic plant species are anticipated to occur in the project area, but compliance with **Mitigation Measure 4.4.6.2A** will assure there will be no significant impacts to these plant species.

Criteria Area Plant Species. No Criteria Area plant species are anticipated to occur on the project area, but compliance with **Mitigation Measure 4.4.6.2A** will assure there will be no significant impacts to these plant species.

Riparian/Riverine Areas and Vernal Pools. Drainage Features 7, 8, 9, 12, and 15 contain riparian/riverine areas, as designated by the MSHCP. The project area does not contain habitat suitable for covered riparian species, such as least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. No vernal pools or ephemeral ponds were observed on the project area and no suitable habitat for any fairy shrimp species was identified on site. No additional mitigation regarding vernal pools or vernal pool species is required. A programmatic-level DBESP was prepared by MBA in 2013 to outline specific requirements for project related impacts to these features in the future. A project-specific DBESP will be required during each development project.

c. Nitrogen Deposition

Nitrogen deposition is the term used to describe nitrogen-based pollutants that are deposited as a result of emissions from future project related activities. The pollutants are typically in the form of nitrogen oxide (NO_x) and ammonia (NH₃)-derived pollutants, primarily nitric acid (HNO₃). Although there are many types of nitrogen-based pollutants resulting from project-related emissions, HNO₃ is typically the easiest to measure and is used in determining nitrogen deposition rates. Mechanisms by which nitrogen deposition can lead to impacts on sensitive species include (1) direct toxicity, (2) changes in species composition among native plants, and (3) enhancement of invasive species (Fenn et al. 2003; Weiss 2006a). Direct toxicity refers to impacts associated with direct contact with the nitrogen pollutants. There is no scientific documentation that links direct toxicity to impacts associated with sensitive plant and wildlife species. Therefore, direct toxicity is not considered a significant impact.

An increase in available nitrogen promotes the growth of non-native weedy species, which alone is not considered a significant impact. The increased dominance and growth of invasive annual grasses is especially prevalent in low-biomass vegetation communities that are naturally nitrogen-limited, such vegetation communities that occur in the project vicinity include coastal sage scrub and vernal pools (Weiss 2006a). An increase in nitrogen deposition does not inhibit the growth of native plants, but promotes the rapid growth of non-native invasive species that could out-compete native plants for available water and nutrients. If the increase of non-native plant species is detrimental to the growth of native plants, the result may be a conversion from a native plant community to a non-native plant community. This change in habitat is only considered a significant impact if that change occurs in suitable habitat for a federally threatened or endangered species within USFWS-designated critical habitat.

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In addition, vernal pools were identified by Weiss (2006a) as a California ecosystem that may be sensitive to nitrogen deposition. Nitrogen deposition in vernal pools stimulates plant growth (including non-native species in adjacent uplands) and the nitrogen is rapidly assimilated by plants and invertebrates within the pools (biomass and dissolved organic nitrogen) (Hobson and Dahlgren 1998). Because of the isolated nature of vernal pools, the nitrogen pollutants accumulate over time and provide a more concentrated level of nitrogen for non-native plants. Since vernal pools are known to provide suitable habitat for a number of federally threatened or endangered species, impacts to vernal pools caused by nitrogen deposition may be considered a significant impact. There are no vernal pools within the project site.

Although non-native plant invasions have affected the vernal pools in the region (the closest recorded occurrence of vernal pool habitat is approximately 3.5 miles to the south), these invasions generally occur in years when precipitation is sparse. In wetter years, the number of non-native plants is reduced since the non-native upland species are intolerant of inundation and the invasion cycle may be reset in some cases. This means that the established non-native plants are not adaptable to an aquatic habitat and die-off during prolonged periods of inundation. Even though the non-native plant species will have an abundance of available nitrogen and optimum growing conditions, the prolonged inundation periods prohibit non-native invasive species growth.

The WLC will consist of mobile, non-point pollution sources (diesel trucks), which will result in a highly random dispersion of emissions that will occur in a broad, regional fashion. Because of the way in which nitrogen is generated by the WLC project, its overall patterns for dispersion, and the multi-variant parameters that would need to be taken into consideration for such an analysis, there is no established scientific basis or standards to study the effects of nitrogen dispersion for non-point pollution sources; hence, project-specific conclusions or mitigation would be overly speculative for the purposes of this EIR.

Specific Plan Design Features. The project is consistent with the major MSHCP requirements relative to core areas, criteria cells, threatened and endangered species. In addition, the project complies with the MSHCP guidelines for urban/wildland interface, riparian/riverine areas, or related buffers (with implementation of **Mitigation Measure 4.4.6.1A**). In addition, future development will be required to demonstrate that it is also consistent with all MSHCP requirements, including indirect impacts such as lighting, noise, and air pollution effects.

Regulatory Compliance. Stephens' kangaroo rats have a low potential to occur within the study area. While the study area is not within the SKR Core Reserve Area, the SKR HCP Implementing Agreement requires payment for loss of habitat within defined areas. The entire study area lies within the fee area. An assessment of individual actions for development within the WLCSP would be required prior to any implementation. The number of acres of disturbance associated with the development and any off-site improvements shall require payment to comply with the SKR HCP. In addition, prior to issuance of a grading permit on each project, applicants will be required to pay the mandatory mitigation fee for the MSHCP. The mitigation fee is a per acre fee for commercial or industrial development.

Mitigation Measures. In addition to payment of SKR and MSHCP impact fees, the following measures will help ensure that potential impacts to sensitive species are reduced to less than significant levels:

- 4.4.6.2A** Each Plot Plan application shall include a focused plant survey of the proposed development site prepared by a qualified biologist to identify if any of the following sensitive plants (i.e., Coulter's goldfields, smooth tarplant, Plummer's mariposa lily, or

thread-leaved brodiaea) are present. If any of the listed plants are found, they may be relocated to the 250-foot setback area outlined in the Specific Plan and discussed in Mitigation Measure 4.4.6.1A. Alternatively, at the applicant's discretion, an impact fee may be paid to the Western Riverside County Regional Conservation Authority (RCA) or other appropriate conservation organizations to offset for the loss of these species. This measure shall be implemented to the satisfaction of the Planning Official.

4.4.6.2B Prior to the approval of any tentative maps for development including or adjacent to any Criteria Cells identified in the Western Riverside County Multiple Species Habitat Conservation Plan, the applicant shall prepare and process a Joint Project Review (JPR) with the Riverside County Resource Conservation Agency (RCA). All criteria cells shall be identified on all such tentative maps. This measure shall be implemented to the satisfaction of the City Planning Division and Riverside County Resource Conservation Agency ("RCA").

In addition, the previously outlined **Mitigation Measures 4.4.6.1A and 4.4.6.1B** will also help reduce potential direct and indirect impacts to biological resources covered by the MSHCP.

Level of Impact After Mitigation. With implementation of **Mitigation Measures 4.4.6.1A, 4.4.6.1B, 4.4.6.2A, and 4.4.6.2B**, potential impacts related to MSHCP consistency will be reduced to less than significant levels.

4.4.6.3 Jurisdictional Delineation, Riparian Habitat or Other Sensitive Natural Communities

Impact 4.4.6.3: *The project has the potential to result in significant impacts to jurisdictional land, riparian habitat and sensitive natural communities and may require subsequent permits from various resource agencies.*

Threshold	<p>Would the proposed project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p> <p>Would the proposed project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p>
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Drainages in the project area were investigated and delineated by MBA in March 2012 and updated in 2013. A total of 15 primary drainage features were identified during this survey and a number of sub-drainages or tributaries were also identified. Jurisdiction for each drainage and/or sub-drainage or tributary was evaluated for jurisdiction under Section 404 and 401 of the CWA as administered by USACE and RWQCB, respectively; Porter Cologne as administered by the RWQCB; and Section 1600 of the Fish and Game Code as administered by the CDFW.

All 15 drainage features identified in the 2013 document were assessed to determine the jurisdictional limits. Based on current conditions, two of the 15 features are subject to the jurisdiction of the USACE and/or RWQCB. In addition, no jurisdictional wetlands or isolated wetlands were identified. Drainage Features 1, 2, 4, 12, and 13 flow to the south and then southwest of the project area. These drainage features are contained in roadside ditches or otherwise sheet flow prior to leaving the project area.

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Drainage Feature 12 and 15 are likely subject to USACE jurisdiction. However, if any portion of Drainage Features 12 and 15 are affected by WLC project construction activities or flood control improvements in the future, then regulatory permitting may be required.

There are two drainage features that are completely isolated, Drainage Features 3 and 14. Drainage Feature 3 is an isolated temporary water quality facility serving the new Skechers building. This feature was created in an existing upland area and will eventually be converted into an underground storm drainage system. The second feature (consisting of two small basins) was created in an upland area to contain polluted runoff from a now-abandoned cattle operation. The eastern feature (Feature 14) is dominated by non-native tree species and contains no native riparian habitat. The western feature contains a mix of non-native trees and native riparian habitat. There is no evidence of ponding and the basin is no longer in use. These basins no longer serve any water quality function and are therefore not considered to be isolated waters of the State under the Porter Cologne Act.

The remaining seven features flow to the south and eventually revert to sheet flow conditions before reaching the San Jacinto Wildlife Area. Each drainage feature was walked until neither an ordinary high water mark (OHWM) nor a clearly defined bed and bank feature was present and the drainage course reverted to sheet flow onto open land. There was no evidence of flows downstream of the drainage where the OHWM was no longer present. Therefore, these features are hydrologically and physically isolated from any downstream RPW or TNW. Surface flows from the project area will eventually be conveyed into the SJWA. The SJWA's system of ponded areas was surveyed to document any downstream connectivity to any RPW or TNW. Based on current site conditions, the water within the SJWA is completely contained within the ponded area system with a large overflow area that conveys flows over a spillway in the southwest corner of the facility. There is no evidence of active flows within the spillway channel and all upstream flows are likely maintained within the SJWA exclusive of major flood events (50- to 100-year floods).

The MBA 2013 report concludes that two of the drainages on the project site are under the jurisdiction of the USACE (Drainages 12 and 15), and several additional drainages are under the jurisdiction of the CDFW and RWQCB (Drainages 7, 8, 9, 12, and 15).

Riparian or riverine areas are lands that contain habitat dominated by trees, shrubs, and persistent emergents, which occur close to or depend upon soil moisture from a nearby water source; or areas with fresh water flowing during all or a portion of the year. Unvegetated drainages (ephemeral streams) may be included if alterations to that drainage have the potential to affect Covered Species and Conservation Areas.

Drainage Feature 7, 8, 9, 12, and 15 within the WLC project are considered riparian/riverine areas, as defined by MSHCP. If impacts to any of these areas cannot be avoided, a DBESP report and relevant mitigation will be required by the RCA.

The project area does not contain habitat suitable for sensitive riparian species, such as least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. Additionally, no vernal pools or ephemeral ponds were observed on the project area and no suitable habitat for any fairy shrimp species was identified on site.

Raptor Foraging Habitat. The WLCSP and off-site facilities contain flat, open areas with sparse vegetation, which could be considered foraging habitat for some raptor species. Due to the regular, heavy disturbance associated with the various agricultural activities in the WLCSP and off-site facilities resulting in a rather limited prey base, and the limited size of the site in relation to the expansive foraging habitat in the near vicinity including both the CDFW Conservation Buffer Area and the SJWA, LPSRA and the extensive Badlands to the east, the foraging habitat on site is considered marginally suitable and an adverse but not significant impact to raptor foraging habitat is anticipated.

Project or Specific Plan Design Features. The WLCSP does not contain any design features related to riparian habitat or other sensitive natural communities.

NOTE: The following changes have been made in responses to Comments A-1-1 in Letter A-1 from the U.S. Army Corps of Engineers, and A-6-12 in Letter A-6 from the U.S. Fish and Wildlife Service and et al.

Mitigation Measures. The JD prepared for the project in 2013 is programmatic in nature because no specific development activity or building plans are proposed at this time. The 2012 JD determined the on-site drainages were not under the jurisdiction of the USACE, but one or more may be under the jurisdiction of the CDFW. Therefore, **Mitigation Measure 4.4.6.3A** will help ensure there will be no significant impacts to riparian areas associated with Waters of the U.S. or Waters of the State as a result of future development within the project.

In addition to the previously identified **Mitigation Measures 4.4.6.1A** through **4.4.6.1C**, the following measures have been identified to reduce the significance of potential impacts to riparian/riverine habitat:

4.4.6.3A Prior to the issuance of grading permits the applicant shall secure a jurisdictional determination from the United States Army Corps of Engineers (USACE) and confirm with the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) if drainage features mapped on the property to be developed are subject to jurisdictional authority. If the features are subject to regulatory protection, the applicant will secure permit approvals with the appropriate agencies prior to initiation of construction. Compensatory riparian habitat mitigation will be provided at a minimum ratio of 1:1 (replacement riparian habitat to impacted riparian habitat) to ensure no net loss of riparian habitat or aquatic resources. It should be noted that this is a minimum recommended ratio but the actual permitting ratio may be higher. These detention basins will be oversized to accommodate the provision of areas of riparian habitat. Maintenance of the basins will be limited to that necessary to ensure their drainage and water quality functions while encouraging habitat growth. Riparian habitat mitigation will be provided concurrent to or prior to impacts. A Compensatory Mitigation Plan will be prepared for all unavoidable impacts and will be consistent with the United States Army Corps of Engineers (USACE)/United States Environmental Protection Agency's Compensatory Mitigation for Losses of Aquatic Resources; Final Rule and the United States Army Corps of Engineers Standard Operating Procedure for Determination of Mitigation Ratios.

The applicant shall consult with United States Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board to establish the need for permits based on the results of a recent jurisdictional delineation and final design plans for each of the proposed facilities. Consultation with the three agencies shall take place and appropriate permits obtained for project-level development. Compensation for losses associated with the altering of drainages on site shall be in agreement with the permit conditions and in coordination with compensation outlined below.

Mitigation will consist of onsite creation, offsite creation, or purchase of mitigation credits from an approved mitigation bank. As outlined in the WLC programmatic DBESP report, onsite riparian habitat will be created at a minimum 1:1 ratio due to the poor quality of onsite habitat. New habitat will be created within the onsite detention/infiltration basins to the extent allowed by the resource agencies to reduce storm flows, improve water quality, and reduce sediment transport. Habitat creation will include the installation of mule fat scrub or similar riparian scrub habitat to promote higher quality riparian habitat, but still

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maintain the basins for their primary role as detention facilities. The use of these areas as conservation areas would require consent from CDFW and the City of Moreno Valley (MM BIO-2b and MM DBESP 1 through 3).

4.4.6.3B As required by the Resource Conservation Agency (RCA), a program-level Determination of a Biological Equivalent or Superior Preservation (DBESP) for impacts to Riverine/Riparian habitat has been prepared and shall be approved by the Resource Conservation Agency prior to project approval. The Determination of a Biological Equivalent or Superior Preservation includes a general discussion of mitigation options for impacts to riverine/riparian areas as well as general location and size of the mitigation area and includes a monitoring program.

If impacts to riparian habitat within the World Logistics Center Specific Plan (WLCSP) cannot be avoided at the time of specific development, then a separate project-level Determination of Biologically Equivalent or Superior Preservation (DBESP) shall be prepared to identify project-specific impacts to riparian habitat and incorporate mitigation options identified in Mitigation Measure 4.4.6.3A.

A project-level Determination of a Biological Equivalent or Superior Preservation for each specific development shall be prepared to document measures to reduce impacts to riparian/riverine habitats in accordance with the Western Riverside County Multiple species Habitat Conservation Plan (MSHCP). The project-level Determination of a Biological Equivalent or Superior Preservation shall include specific measures to reduce impacts to riparian areas and provide mitigation in the form of onsite preservation of riparian areas and/or a combination of compensation through purchase and placement of lands with riparian/riverine habitat into permanent conservation through a conservation easement and/or restoration or enhancement efforts at offsite or onsite locations. Therefore, mitigation required for compensation for impacts to riparian/ riverine areas will require a minimum of 1:1 mitigation ratio of riparian/riverine mitigation land.

As outlined in the WLC programmatic DBESP, erosion control improvements will be installed within Drainage 9 to reduce sediment transport, and additional riparian habitat will be enhanced within this drainage following the installation of the erosion control improvements (MM DBESP 4 and 5).

Note: The following Mitigation Measure has been added in response to Comment F-1-6 in Letter F-1 from the Center for Biological Diversity/San Bernardino Valley Audubon Society.

4.4.6.3C Prior to issuance of any grading permit for any offsite improvements that support development within the World Logistics Center Specific Plan, the developer shall retain a qualified biologist to prepare a jurisdictional delineation (JD) for any drainage channels affected by construction of the offsite improvements. This jurisdictional delineation shall be submitted to the U.S. Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW) for review and concurrence. If the offsite improvements will not affect any identified jurisdictional areas, no United States Army Corps of Engineers permitting is required. However, permitting through the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (i.e., Streambed Alternation Agreement) may still be required for these improvements. The applicant shall consult with United States Army Corps of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board to establish the need for permits based on the results of the 2012 jurisdictional delineation and final design plans for each of the proposed the facilities. Consultation with the three agencies shall take place and appropriate permits obtained. Compensation for losses associated with any altered offsite drainages shall be in agreement with the permit conditions. Any landscaping associated with these offsite improvements shall use only native species to help protect biological

resources residing within or traveling through these drainages per Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Table 6.1.2. This measure shall be implemented to the satisfaction of the City Planning Division in consultation with the U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, and the California Department of Fish and Wildlife.

Level of Significance after Mitigation. With implementation of **Mitigation Measures 4.4.6.1A, 4.4.6.1B, 4.4.6.3A, and 4.4.6.3A through 4.4.6.3C**, potential impacts to riparian habitat or other sensitive natural communities, including on-site drainages, will be reduced to less than significant levels.

4.4.6.4 Candidate, Non-listed Sensitive, or Special-Status Species

Impact 4.4.6.4: *The proposed project has the potential to affect the burrowing owl, designated “species of special concern” by the California Department of Fish and Wildlife.*

Threshold	Would the proposed project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
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Critical Habitat. No USFWS designated Critical Habitat for any species is located within the project area; therefore, no further action with regard to Critical Habitat is necessary.

Los Angeles Pocket Mouse. Focused surveys for the LAPM were conducted in August 2005, June 2010, June 2012, and July 2013. Suitable habitat was found within Drainage Feature 9, one of the main drainage features located in the eastern end of the project area. In its MSHCP Consistency Report, MBA concluded that LAPM is absent from the project area. However, the Specific Plan indicates this drainage will remain in its present natural condition, except for the southern end as it becomes the Street H channel and outlets to the SJWA land to the south. Extensive surveys were completed in 2005, 2010, 2012, and 2013, which concluded that Los Angeles pocket mouse was not present. In addition, there is no suitable habitat between the known occurrence of Los Angeles pocket mouse and the WLCSP. The known populations of Los Angeles pocket mouse are located within the southern portion of the SJWA, which is more than 2 miles from the southern WLCSP boundary. The area between the known recorded occurrences of Los Angeles pocket mouse and the WLCSP is actively disked farmland. Therefore, there is no habitat connectivity between the known occurrences of Los Angeles pocket mouse and the WLCSP. However, to ensure that no impacts occur, **Mitigation Measure 4.4.6.4E** has been added below.

Migratory or Nesting Birds. The 2013 MBA report found the extensive agriculture plant communities in the WLCSP and offsite facilities provide suitable nesting habitat for ground-nesting avian species such as western meadowlark (*Sturnella neglecta*) and burrowing owl. Suitable habitat for shrub and tree nesting species such as red-tailed hawk, black phoebe (*Sayornis nigricans*), and house finch occur along the edges of existing development surrounding the WLCSP and offsite facilities as well as isolated, remnant patches of vegetation in undisturbed portions of the WLCSP and offsite facilities. Therefore, portions of the WLCSP and offsite facilities and immediately adjacent to the WLCSP and off-site facilities provide suitable nesting habitat for migratory birds protected under the MBTA and California Fish and Game Code.

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The project area contains suitable nesting habitat for several tree-, shrub-, and ground-nesting avian species. Therefore, MBA recommends construction activities avoid the avian nesting season, from February to August, if possible. If construction activity must take place during the nesting season, a pre-construction nesting bird survey should be conducted prior to any ground disturbance activities. The survey can be conducted in conjunction with the pre-construction survey for burrowing owl.

If passerine birds are found to be nesting or if there is evidence of nesting behavior within 250 feet of the impact area, a 250-foot setback will be required around the nest where no vegetation disturbance will be permitted. For raptor species such as hawks and owls, this buffer should be expanded to 500 feet. A qualified biologist will be required to closely monitor nests until it is determined that they are no longer active, at which time construction activity in the vicinity of nests could continue. Construction activity may proceed within the buffer area at the discretion of the biological monitor.

Burrowing Owl. For those species that are not covered by the take and incidental take provisions of the MSHCP (e.g., burrowing owl), the MSHCP requirements dictate that further protective action be taken. While no burrowing owls were identified within the project's proposed area of disturbance, because suitable habitat is present within the project area for the burrowing owl and because the species is highly mobile, a potential exists that, at some future date prior to project development, this species may occupy the development sites. This is a potentially significant impact requiring mitigation.

All burrowing owl observations within the project site are associated with artificially created berms. The recorded sightings have been within a bank of an existing drainage feature, a berm within the recently constructed detention basin associated with the Skechers Building (Drainage 3), and a roadside berm just south of Alessandro Boulevard.

The proposed detention basins will be constructed with similar manufactured berms. Based on historic observations of burrowing owl within the project site, it is reasonable to assume that construction of similar berms will continue to provide optimum burrow habitat for resident burrowing owls.

In addition, since there have been no recorded occurrences of burrowing owl in the northern portion of the SJWA there is no concern for competition with other burrowing owls. It is reasonable to assume that the created detention basins will provide more than a sufficient amount of foraging habitat to support a single pair of burrowing owl. Since the southern 250 -feet of the WLCSP will not contain any building development and construction activities will be restricted to detention basins and associated access roads, it would be more appropriate to include the buffer area in a deed restriction rather than a conservation easement.

Plant Survey Areas. The project limits are within MSHCP Survey Area 10 of the NEPSSA and MSHCP Survey Area 9 of the CASSA for plant species. The MSHCP requires that a habitat site assessment (HSA) be conducted for all proposed developments within Narrow Endemic Plant Species' (NEPSSAs) and Criteria Area Sensitive Plant Species' (CASSAs). The HSA for most NEPSSA and CASSA plants must be done during a normal rainfall year and/rainy season. If it is determined during the HSA that suitable soils and/or growing conditions are present on site to support identified NEPSSA species, a focused plant survey is required during the plant species blooming period.

Habitat suitability of the site for NEPSSA and CASSA species is detailed in the General Biological Resources and MSHCP Compliance Report (EIR Appendix E). None of the species analyzed in the NEPSSA or CASSAs is anticipated to occur on the WLC project site. The implementation of the WLC project would not affect the habitat or result in a direct impact for any special status plant species.

Project or Specific Plan Design Features. The WLCSP does not contain any design features relative to sensitive species or birds, other than the landscape palette that contains all native and/or drought-tolerant plants that may be utilized by birds tolerant of human activity.

The following mitigation measures have been changed in response to Comments A-6-17 in Letter A-6 from the U.S. Fish and Wildlife Service, and Comment B-3-33 in Letter B-3 from the California Department of Fish and Wildlife.

Mitigation Measures. The following measures have been identified to reduce the significance of potential impacts to special status bird species:

Listed or Sensitive Species:

The previously identified **Mitigation Measures 4.4.6.1A** through **4.4.6.1D** will reduce potential impacts on listed or otherwise sensitive plant or animal species or critical habitat to less than significant levels, other than the following which are addressed with additional measures:

Migratory/Nesting Birds

- 4.4.6.4A** Pursuant to the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC), site preparation activities (removal of trees and vegetation) shall be avoided during the nesting season of potentially occurring native and migratory bird species (generally February 1 to August 31). If site preparation activities must occur during the nesting season, a pre-activity field survey shall be conducted by a qualified biologist prior to issuance of grading permits for such development. The survey shall determine if active nests of species protected by the Migratory Bird Treaty Act or California Fish and Game Code are present in the construction zone. If active nests of these species are found, the developer shall establish an appropriate buffer zone with no grading or heavy equipment activity within of 500 feet from an active listed species or raptor nest, 300 feet from other sensitive or protected bird nests (non-listed), 250 feet from passerine birds, or 100 feet for sensitive or protected songbird nests. All construction activity within the vicinity of active nests must be conducted in the presence of a qualified biological monitor. Construction activity may encroach into the buffer area at the discretion of the biological monitor in consultation with CDFW. In the event no special status avian species are identified within the limits of disturbance, no further mitigation is required. In the event such species are identified within the limits of ground disturbance, mitigation measure 4.4.6.4B shall also apply. This measure shall be implemented to the satisfaction of the City Planning Division.
- 4.4.6.4B** If it is determined that project-related grading or construction will affect nesting migratory bird species, no grading or heavy equipment activity shall take place within the limits established in Mitigation Measure 4.4.6.4A until it has been determined by a qualified biologist that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow. This measure shall be implemented to the satisfaction of the City Planning Division.
- 4.4.6.4C** The loss of foraging habitat for golden eagle and white-tailed kite will be mitigated by payment of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) fee and the creation of a landscaped buffer area adjacent to the San Jacinto Wildlife Area property (SJWA). First, the payment of the Western Riverside County Multiple species Habitat Conservation Plan fee will be required on a project-by-project basis. Second, a 250-foot setback as described in Mitigation Measure 4.4.6.1A will be established within the World Logistics Center Specific Plan area. This area will reduce impacts to raptor species foraging in the adjacent San Jacinto Wildlife Area open space areas.

Burrowing Owl

4.4.6.4D A pre-construction clearance survey for burrowing owl shall be conducted by a qualified biologist no more than thirty (30) days prior to any grading or ground disturbing activities within the project area.

In the event no burrowing owls are observed within the limits of ground disturbance, no further mitigation is required.

If construction is to be initiated during the breeding season (February 1 through August 31) and burrowing owl is determined to occupy any portion of the disturbance area during the 30-day pre-construction survey, construction activity shall maintain a 500 foot buffer area around any active nest/burrow until it has been determined that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow. If this avoidance buffer cannot be maintained, consultation with the California Department of Fish and Wildlife (CDFW) shall take place and an appropriate avoidance distance established. No disturbance to active burrows shall occur without appropriate permitting through the Migratory Bird Treaty Act and/or California Department of Fish and Wildlife.

If active burrowing owl burrows are detected outside the breeding season (September through January), or within the breeding season but owls are not nesting or in the process of nesting, active and/or passive relocation may be conducted following consultation with the California Department of Fish and Wildlife. A relocation plan may be required by California Department of Fish and Wildlife if active and/or passive relocation is necessary. The relocation plan will outline the basic process and provides options for avoidance and mitigation. Artificial burrows -may be constructed within the buffer area south of the World Logistics Center Specific Plan. Construction activity may occur within 500 feet of the burrows at the discretion of the biological monitor in consultation with CDFW.

A relocation plan may be required by California Department of Fish and Wildlife if active or passive relocation is necessary. Artificial burrows may be constructed within appropriate burrowing owl habitat within the proposed open space/conservation area (Planning Area 30), a 74.3-acre area in the southwest portion of the Specific Plan. This area abuts the Lake Perris State Recreation Area (LPSRA) which is already in conservation. If suitable habitat is not present in Planning Area 30, owls may be relocated to the SJWA, the 250-foot buffer area or other suitable on-site or off-site areas. Construction activity may occur within 500 feet of the burrows at the discretion of the biological monitor.

Los Angeles Pocket Mouse

4.4.6.4E Prior to the approval of any Plot Plans proposing the development of land including or adjacent to Drainage 9, a protocol survey for the Los Angeles Pocket Mouse (LAPM), including 100 feet upstream and downstream of the affected reach shall be prepared by a qualified biologist and submitted to the City. If the affected drainage is not occupied, the area is considered not to be occupied and development can continue without further action. If the species is found within the specific survey area, no development shall occur until an appropriate mitigation fee is paid or appropriate amount of land set aside on the project site or off site to compensate for any loss of occupied Los Angeles Pocket Mouse habitat. Alternatively, individuals may be relocated to the 250-foot setback zone along the southern boundary of the property identified in Mitigation Measure 4.4.6.1A, or other appropriate areas as determined by the United States Fish and Wildlife Service. If necessary, this measure shall also be coordinated with Mitigation Measure 4.4.6.2B regarding preparation and processing of a Determination of a Biological Equivalent or Superior Preservation report. This measure shall be implemented to the satisfaction of the City Planning Division.

Resource Management

4.4.6.4F Prior to approval of any discretionary permits for development within Planning Areas 10 and 12, a Biological Resource Management Plan (BRMP) shall be prepared to prescribe how the 250-foot setback area outlined in Mitigation Measure 4.4.6.1A will be developed and maintained. This plan will identify frequent and infrequent vegetation management requirements (i.e., removal of invasive plants) and the planting and maintaining trees to provide roosting and nesting opportunities for raptors and other birds. The Biological Resource Management Plan will also describe how relocation of listed or sensitive species will occur from other locations as outlined in Mitigation Measures 4.4.6.2A, 4.4.6.4D, and 4.4.6.4E.

The Biological Resource Management Plan shall be reviewed and approved by the Planning Official in consultation with the San Jacinto Wildlife Area Manager. The Biological Resource Management Plan shall cover all the land within the 250-foot setback zone within Planning Areas 10 and 12. Implementation of the plan shall be supervised by a qualified biologist, to the satisfaction of the City Planning Division.

4.4.6.4G Mitigation Measure 4.4.6.1A specifies that a landscape plan shall be submitted with any development proposal for lots adjacent to the California Department of Fish and Wildlife (CDFW) San Jacinto Wildlife Area (SJWA) property prior to issuance of a precise grading permit. The landscape plan shall be prepared by a licensed landscape architect in consultation with a qualified biologist and shall be consistent with the design standards contained in the Specific Plan. No plant species listed in Section 6.1.4 or Table 6.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) shall be installed within the setback area. In conjunction with development adjacent to the San Jacinto Wildlife Area (SJWA), cottonwood trees shall be planted within the 250-foot setback area, consistent with the World Logistics Center Specific Plan plant palette (per DBESP MM 8).

During construction, the runoff leaving construction areas will be directed to onsite detention basins and away from downstream drainage features located offsite. All projects within the WLCSP will be required to prepare a Storm Water Pollution Prevention Plan (as outlined in MM 4.9.6.2B). Regarding the 250-foot setback area, pedestrian and vehicular access to areas of riparian/riverine habitat will be prohibited except for controlled maintenance access. Finally, no grading shall be permitted within conserved riparian/riverine habitat areas except for grading necessary to established or enhance habitat areas (DBESP MM 6, 7, 9, and 10).

4.4.6.4H As outlined in Mitigation Measure 4.4.6.1A, development adjacent to the 250-foot open space setback shall have a six-foot chain link fence or similar barrier to help separate human activity and the buffer area. Any chain link fencing installed on any properties adjacent to the 250-foot buffer area shall have metal mesh installed below and above ground level to prevent animals from accessing new development areas.

4.4.6.4I The individual property owner and/or Property Owners Association (POA) as appropriate shall be responsible for maintaining the various onsite landscaped areas, open improved or natural drainage channels, and detention or flood control basins in a manner that provide for fuel management and vector control pursuant to standards maintained by the City Fire Marshall and County Department of Environmental Health- Vector Control Group. This measure requires the individual owner or Property Owners Association (POA) to manage vegetation in and around these areas or improvements so as to not represent a fire hazard as defined by the City Fire Department through the substantial buildup of combustible materials. This measure also requires the individual owner or Property Owners Association to manage vegetation and standing water in drainage channels and basins such that they do not encourage or allow vectors to occur (primarily rats and mosquitoes). Runoff shall not be allowed to stand in channels or basins for more

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than 72 hours without treatment or maintenance to prevent establishment of mosquitoes per published County vector control guidelines and “Best Management Practices for Mosquito Control on California State Properties” which is available from the California West Nile Virus website at <http://www.westnile.ca.gov/resources>. This measure shall be implemented by the Property Owners Association in consultation with the City Fire Department and Riverside County Department of Environmental Health – Vector Control Group.

4.4.6.4J A Fuel Management Plan shall be prepared on a project-by-project basis for those Planning Areas adjacent to the south and east boundary of the World Logistics Center Specific Plan adjacent to Western Riverside County Multiple Species Habitat Conservation Plan Conservation Areas. The Fuel Management Plan shall be prepared by the project proponent and submitted for approval to the prior to plot plan approval for those projects on the southern and eastern Western Riverside County Multiple Species Habitat Conservation Plan boundary. Per the Western Riverside County Multiple Species Habitat Conservation Plan guidelines, the Fuel Management Plan shall include the following:

- A plant palette of adequate plant species that may be planted within the Fuel Management Area, which will be approved by a biologist familiar with the plant requirements of the area.
- A list of non-native invasive plants that are prohibited from installation.
- Maintenance activities and a maintenance schedule.

Fuel modification zones shall be mapped and include an impact assessment as required under California Environmental Quality Act guidelines for a project-level analysis. The plan shall demonstrate that the adjacent Western Riverside County Multiple Species Habitat Conservation Plan Areas are adequately protected from expected fire risks.

4.4.6.4K Prior to approval of any plot plans for development adjacent to the SJWA, the applicant shall demonstrate that direct light rays have been contained within the development area, per requirements of the MSHCP Section 6.0 which states, “Night lighting shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting.” This measure shall be implemented to the satisfaction of the City Planning Division.

Level of Significance after Mitigation. Implementation of the above-listed mitigation measures would reduce impacts to burrowing owl, migratory bird species, and Los Angeles pocket mouse to less than significant levels.

4.4.7 Cumulative Impacts

The cumulative area for biological resources is the Western Riverside County MSHCP area. The MSHCP establishes a comprehensive, multi-jurisdictional program focused on the conservation of 146 species and their habitats in western Riverside County. As stated in its Conservation Element, the City reviews all public and private development and construction projects and other land use plans/activities within the MSHCP area to ensure compliance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP. As a signatory to the MSHCP Implementing Agreement, the City has been issued “Take Authorization,” which allows the implementation of land use decisions consistent with the MSHCP without individual authorization by State or Federal authorities. As required by the MSHCP, focused biological resource studies have been conducted to assess potential impacts associated with development of the proposed uses. Where impacts to special status bird species and jurisdictional areas have been identified, mitigation

has been identified to reduce the project specific impacts to a less than significant level. Additionally, the MSHCP and its Implementation Agreement contain a fee mitigation program pursuant to which local agencies collect development impact fees and remit such fees to the RCA. These fees are in turn used to acquire lands which are suitable for habitat preservation for species covered by the MSHCP. In fact, habitat lands created by the MSHCP also have biological benefits for species technically not covered by the MSHCP, such as the burrowing owl. Habitat acquired by the MSHCP may be suitable as owl habitat. The latest adjustment of the MSHCP fee mitigation (July 1, 2009) allows the collection of fees of \$6,597 per acre of industrial development. The payment of required MSHCP is a standard requirement for all development occurring within the MSHCP area.

This EIR determined that indirect impacts of the project on the SJWA would be less than significant with mitigation, and the regional (cumulative) implications of the project can be addressed through the fee payment program of the MSHCP because it provides a regional and comprehensive approach to conservation planning. For example, future development that impacts Drainage 9 would be required to prepare a DBESP report consistent with MSHCP requirements. Through the implementation of the stated mitigation for project-specific impacts, and the payment of required MSHCP mitigation fees, no significant cumulative effect on biological resources would result from the development of the proposed uses with implementation of the identified program mitigation measures.

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NOTE TO READERS. *This section has been revised in response to public comments received on the Programmatic DEIR which have resulted in project changes, updates to technical studies, and revisions to DEIR sections and proposed Mitigation Measures.*

4.5 CULTURAL AND PALEONTOLOGICAL RESOURCES

This section identifies and evaluates the potential of the proposed project to have adverse effects on archaeological, historical, and paleontological resources. The resources of concern include, but are not limited to, prehistoric and historic artifacts, burials, sites of religious or cultural significance to Native American groups, and historic structures. This section provides a detailed discussion of impacts potentially attributable to the proposed project, and criteria used to determine impact significance to cultural resources.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The analysis contained in this section is based on the following technical study prepared for the proposed project:

- Cultural Resources Assessment, Michael Brandman Associates, original dated April 12, 2012, updated September 2014 (Appendix F).
- Copies of City correspondence illustrating City compliance with SB 18 tribal consultation requirements (Appendix A).

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In addition to this technical study, the analysis contained in this section is also based on the following reference documents:

- Moreno Valley General Plan Conservation Element, adopted October, 2006.
- Moreno Valley General Plan Environmental Impact Report, certified July, 2006.

4.5.1 Existing Setting

4.5.1.1 Archaeological Resources

Archaeological resources are those associated with prehistoric cultural sites, prehistoric isolates, and the remnants of historic cultural sites that lack substantive building remnants (termed “historic archaeological sites”) such as roads and trails. Prehistoric cultural resources consist of those physical properties that predate the advent of written records in a particular region that are considered important to a culture, subculture, or community for scientific or humanistic reasons. These include geographic districts, structures, sites, objects, and other physical evidence of past human activity. Similar to prehistoric cultural resources, historic cultural resources in a particular geographic region are considered important to a culture, subculture, or community, and postdate the advent of written records. An archaeological records search was conducted through the Eastern Information Center (EIC) at the University of California, Riverside by the project archaeologist, Michael Brandman Associates (MBA).

The results of this records search indicated that the project site and surrounding area contain a number of Native American (NA) sites, mainly milling features and slicks associated with the uplands of the nearby Mount Russell Range. The area also contains several historic sites mainly remnant artifacts and foundations of historic homestead/farmstead buildings and/or ranch complexes.

4.5.1.2 Historic Resources

The following is excerpted and summarized from Viola Hamner’s “In the Beginning,” a history of life in Moreno Valley (Hamner 2003):

Our valley was once called San Jacinto Plains. It was so named because the land was considered a part of the huge Rancho San Jacinto, dating back to mission times. It has been described as part of the tableland that stretches between Box Springs and the San Jacinto Mountains, and between the Badlands and Temecula.

Great bands of sheep and herds of cattle from the rancho roamed our valley and munched the grasses and weeds. Indian made trails and camped near the hills. Just as new, the hills turned brown during the summer months and into the spring, the undisturbed land became a billowy lake of blossoms...

When the huge Alessandro Tract on the western part of our valley was recorded in August 1887, and the town of Alessandro was established, our valley became known as Alessandro Valley or Alessandro Plains. After 1890 when the town of Moreno was established, it became known as Moreno Valley as well as Alessandro Valley.

Then in 1890 appeared Frank E. Brown and his Bear Valley and Alessandro Development Company, coming in like a great wind, and in one big swoop, changed our valley forever... Brown and his partner Edward Judson, devised a plan to build a dam and transport water to their land from Big Bear Mountain. They then founded the successful colony of Redlands. They concluded that if they built the Bear Valley Dam higher, there would be enough water in the big reservoir to establish another colony in what is now Moreno Valley.

Brown and his investors bought and subdivided thousands of acres of land throughout the valley.

In April 1891, the precious Bear Valley water finally arrived. It traveled down the mountain and through pipelines, tunnels, and ditches for a distance of forty miles... With only a promise of water, the excited settlers started to improve their parcels.

For several years, there was great hope and planting activity in the valley. Then, in 1894, a series of misfortunes befell the valley, including several years of drought and a lack of irrigation water as a result of losing a water rights decision with Redlands. It turned out the Big Bear Dam had not been built large enough to handle drought conditions.

The drought continued and by 1898, Big Bear Lake was virtually dry. Depopulation of Moreno Valley began, and some settlers moved to nearby towns, taking their houses with them. An English writer described it as a "Valley on Wheels." Even the three-story Hotel de Moreno (at the corner of Alessandro Avenue and Redlands Boulevard). "Some businesses continued to operate in the town of Moreno. The General Store and Post Office continued on for over 100 years. The town may have withered, but it never died.

Over the years, other settlers who could afford it, dug their own wells and continued to raise citrus. In the spring, the sweet smell of orange blossoms gave delightful encouragement. Olives and other crops were planted, but most of the acreage in Moreno Valley was filled with "amber fields of grain." The dry-land farming had only the winter rains to sustain them.

The author then refers to the "second coming or the second spurt of development. This began with the subdivision of the Sunnymead Orchard Tract in 1912, the establishment of Alessandro Flying Field (March Field) in 1918, and the subdivision of the Edgemont Tract in 1923."

Finally, the author refers to the "third coming when huge parcels of open land were turned into housing tracts, starting in the 1960's, resulting in an explosion of population. The city of Moreno Valley was founded in November 1984. It encompassed the Moreno, Sunnymead, and Edgemont areas. It became the 20th City in Riverside County and the second largest in population at that time."

4.5.1.3 Paleontological Resources

The project site is located at the northern end of the Peninsular Range Geomorphic Province California Geologic Survey (2002), a 900-mile long northwest-southeast trending structural block that extends from the tip of Baja California to the Transverse Ranges and includes the Los Angeles Basin. This region is characterized by a series of mountain ranges separated by northwest-trending valleys sub-parallel to faults branching from the San Andreas Fault. The trend of topography is similar to that of the Coast Ranges Geomorphic Province located to the north, but the geology is more like that of the Sierra Nevada, with granitic rock intruding on the older metamorphic rocks. It contains extensive pre-Cretaceous (greater than 65 million years ago) igneous and metamorphic rocks covered by limited exposures of post-Cretaceous sedimentary deposits.

Specifically, the project site is located on the Perris Block, which extends from the southern foot of the San Gabriel and San Bernardino Mountains southeast to the vicinity of Bachelor Mountain and Poly Butte. It is bounded on the southwest by the Elsinore Fault Zone and on the northeast by the San Jacinto Fault. The surface of the Perris Block consists of granitic exposures that have been tectonically tilted eastward, leaving granitic outcrops elevated and exposed on the west side of the Perris Block (Jurupa Hills) and allowing Pleistocene sediments to cover the east side, filling the eastern San Bernardino, Lakeview, Perris, and San Jacinto Valleys.

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The project site lies between the plutonic batholith of Mt. Russell, the San Jacinto fault zone and the Pliocene-era non-marine sedimentary rocks of The Badlands.¹ Within the project limits, Holocene alluvial sediments and isolated Pleistocene alluvial sediments have been mapped across much of the site, with a small outcrop of Cretaceous granitic bedrock on the surface in the southwestern portion of the site. It is possible that deposits of middle to late Pleistocene (300,000 to 10,000 years ago) alluvium are present just below the surface in isolated locations of the site, but there are no surface expressions of this older formation on the surface within the project site.

Artificial Fill. Artificial fill consists of sediments that have been removed from one location and transported to another by human activity. Artificial fill will sometimes contain modern debris such as asphalt, wood, bricks, concrete, metal, glass, plastic, and plant material. Artificial fill can contain fossils, but since these fossils have been removed from their original location, it is unlikely to contain in-situ fossils. Artificial fill can be found in isolated areas on the project site, mainly associated with former ranch/farm sites or existing residences and farms.

Holocene Alluvial Fan Deposits. Holocene Alluvial Fan Deposits are also known as Recent to Young Alluvial Fan Deposits. They are found at the mouths of canyons or along the sides of hills that flank river and stream valleys (e.g., the Badlands to the east and northeast). They represent deposition by small streams that flow out of mountains and hills. They were deposited during the early to late Holocene and range in age from the recent to 10,000 years before the present. Although Holocene alluvium can contain remains of plants and animals, generally not enough time has passed for the remains to become fossilized. In addition, the remains are contemporaneous with modern species, and these remains are usually not considered to be significant. These deposits are too young to contain in-situ fossils and have low paleontological sensitivity; however, it should be noted that although an area may be mapped with younger alluvium on the surface, deposits of older alluvium are often encountered at shallow depths below the surface, and these older sediments can and do contain fossils.

Pleistocene Alluvial Fan Deposits. Pleistocene Alluvial Fan Deposits are also known as Old Alluvial Fan Deposits and Very Old Alluvial Fan Deposits. Like the Holocene Alluvial Fan Deposits described above, they are found at the mouths of canyons and along the sides of hills that flank river and stream valleys, they are older than the Holocene deposits. The Old Alluvial Fan Deposits were deposited during the late to middle Pleistocene (10,000–300,000 years ago) and the Very Old Alluvial Fan Deposits were deposited during the middle to Early Pleistocene (300,000–1.8 million years ago). Within the subsurface of the project area, sediments from the middle to late Pleistocene likely exist at depths (i.e., possibly as shallow as 5 feet). In addition, as early to middle Pleistocene alluvial sediments are mapped as occurring just to the east and west of the project area, it is also likely that these older sediments may be encountered as well. Fossils are known in similar Pleistocene deposits from excavations for roads, housing developments, and quarries within the Southern California area. These sediments have the potential to contain in-situ fossils and have a high paleontological sensitivity.

Heterogeneous Granitic Rocks. Heterogeneous mixtures of granitic rocks contain some metamorphic rocks such as schist and gneiss. Granitic rocks range in composition from hornblende-rich quartz diorite to leucocratic tonalite and from potassium feldspar-free rocks to granodiorite and quartz diorite. Because of its igneous origin, granitic rocks do not contain paleontological resources. Surface bedrock deposits are found in the upland areas near the southwest portion of the project site, associated with the Mount Russell Range surrounding Lake Perris.

¹ *Cultural Resources Assessment*, Michael Brandman Associates, Inc., April 24, 2012.

Summary. A paleontological locality search indicated that there was a low potential for significant paleontological resources to be encountered by construction excavation on the project site at the depths planned for the project, although it is possible that Pleistocene alluvial deposits, which have a higher potential to contain fossils, may be found in some locations during project grading.

4.5.1.4 Ethnographic Context

The Moreno Valley General Plan EIR states that the Luiseño and Cahuilla peoples occupied the region during the Late Prehistoric period. Unfortunately, there is a lack of definitive archaeological evidence linking the prehistoric site complexes located within the City limits of Moreno Valley to any single modern tribal group. It is likely that northern Luiseño and western Cahuilla peoples accessed this area during the late prehistoric period for resource gathering. Areas located at the base of Mt. Russell would have been a logical place for a trade route, as it would link prehistoric site complexes at the north end of the City with the marshy areas at the north end of the San Jacinto Valley. Serrano peoples may have also used the San Jacinto Valley to link with their more southern groups.

a. Cahuilla

The Cahuilla Indians occupied the San Timoteo valley prior to contact with Spanish Mission padres and military personnel, which places the project area near their traditional use areas. Of all the southern California Indians, the Cahuilla existed within the most geographically diverse region, constrained only by water supplies and topography. Currently, it is thought that a migration of Shoshonean peoples from the Great Basin occurred approximately 1,000 to 600 years ago, with populations moving into much of desert and coastal Southern California. Included among these migrants were the forbearers to the modern Cahuilla. The prehistoric Cahuilla were characterized by the occupation of sedentary villages in subsistence territories that permitted them to reach the majority of their resources within a day's walk. Villages were commonly located near reliable sources of water. During October to November, much of the village population moved to temporary camps in the mountains to harvest acorns and hunt game.

Inland groups also had fishing and gathering spots on the coast that they visited annually. In comparison with the Gabrielino and Luiseño, the Cahuilla appear to have had a lower population density and a less rigid social structure. The Cahuilla patterns may have been relatively stable until mission secularization in 1834, due to the policy of the Catholic Mission fathers or padres to maintain imported European traditional style settlement and economic patterns.

b. Luiseño

The Luiseño, belong to the Shoshonean linguistic family, which is also shared by Cahuilla, Gabrielino, and Serrano among others.¹ Luiseño villages could be found from the Pacific Ocean inland to the western base of the San Jacinto River and near Fallbrook. The villages were typically established near defined water and food sources and in good defensive locations, so these villages were commonly located along valley bottoms, streams, or coastal strands. The Luiseño characteristically lived in sedentary villages, therefore one clan or family occupied several food-gathering locations and aggressively guarded these areas against other clans.

c. Serrano

The project area is considered to be in an area historically used by the Serrano. All indigenous groups adjacent to the eastern San Bernardino Mountains were decimated by the Spanish, but some

¹ *Cultural Resources Assessment*, Michael Brandman Associates, Inc., April 24, 2012.

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Serrano survived for many years thereafter in the far eastern San Bernardino Mountains due to the ruggedness of the terrain and the dispersed population. It is believed Serrano families inhabited the *Guachama Ranchería* or *Politana* in the early 1800s. This village apparently housed the Rancho San Bernardino *estancia* after about 1819. Their range is generally thought to have been located in and east of the Cajon Pass area of the San Bernardino Mountains, north of Yucaipa, west of Twentynine Palms and south of Victorville. Like all prehistoric Californians, the range of this group was determined by reliable water sources. A Serrano village typically consisted of a collection of families centered about a ceremonial house, with individual families inhabiting willow-framed huts with tule thatching. Considered hunter-gatherers, the Serrano exhibited a sophisticated technology devoted to hunting small animals and gathering roots, tubers, and seeds of various kinds. Today, Serrano descendants are found mostly on the Morongo and San Manuel reservations.

4.5.1.5 Local History

a. Spanish Period (A.D. 1769 to 1821)

The earliest record of exploration of the Moreno Valley area is from the journal of Juan Bautista de Anza, a Spanish explorer who traveled from Mexico City through the San Jacinto Valley, passing by Mystic Lake and through the Moreno Valley area, on his way to Monterrey and San Francisco in 1774.

Father Junipero Serra was sent to Alta California to create a chain of Missions and Mission outposts to bring Christianity to the indigenous population, and create a foundation for colonization of the region. Located between the previously established presidios in Monterey and San Diego, Serra had military assistance in his quest and the San Bernardino area came under the early control of Spanish soldier Pedro Fages and Father Francisco Garcés. In 1819, Rancho San Bernardino was established. This followed a decision by the heads of the mission system to expand their agricultural holdings into the interior and later establish a chain of additional Missions in the desert interior. A decision was made to create an *estancia*, or a ranch headquarters with a chapel that was occasionally visited by padres at the *Guachama Ranchería*. Work on the San Bernardino *Asistencia* was started about 1830, and it was not yet finished when the project was abandoned in 1834. The rancho traditions were kept once Mexico established control over the area, but without the original authority of the Mission padres.

b. Mexican Period (A.D. 1821 to 1848)

After years of internal fighting, Mexico achieved its independence from Spain in 1821 and Alta California became the northern frontier of the State of Mexico. The Mission padres were then forced to swear allegiance to Mexico in 1822. Secularization of the missions took place over the next decade and the former mission lands were transferred to the large Mexican families that had settled in the area. Affiliated with Mission San Luis Rey, the Rancho San Jacinto was formed on December 21, 1842 and granted to Jose Antonio Estudillo. This rancho provided Estudillo with twice as much land, 8 square leagues, or 46,080 acres, as he had petitioned for the previous August. Lands north of the modern Alessandro Boulevard were not claimed by any family, probably because little reliable water existed in the area, except for the Mystic Lake cienega, and because it was a two-day ride from the closest Missions, San Gabriel, and San Luis Rey. The property was petitioned for division by Estudillo's brother-in-law Miguel de Pedrona, soon after and a small portion of The Badlands north of Hemet was added to form the Rancho San Jacinto Nuevo y Potrero.

There is historical evidence a road led from the Rancho San Jacinto headquarters northwest along the base of The Badlands to the springs in the Box Springs Mountains east of what is now Riverside, then over to roads near the Santa Ana River. The route, which likely followed the current alignment of Gilman Springs Road, has been used for travel for over 160 years. The primary purpose of the

interior ranchos was to raise cattle and sheep; however, beyond the Mystic Lake *ciénega* west of Eden Hot Springs, little reliable water was found north of San Jacinto. The trail likely brought travelers along the base of Mt. Russell as this would shorten the trip to Box Springs. The upper San Jacinto Valley proved marginal in terms of food production for Native Americans, a factor that limited agricultural growth expansion well into the 1950s.

c. Moreno Valley Before 1893

Theodore Street was the eastern border of the old Bear Valley and Alessandro Development Company (BV&A) development. BV&A conceptualized the town of Moreno and the community of Alessandro in 1889. Frank Elwood Brown, an engineer who moved to California in 1876, was the co-founder with Edward Judson of the town of Redlands. In 1890, Brown and other investors formed the BV&A to “plat out new towns, bring Bear Valley water to the [Moreno] Valley, and open another large area to agricultural and town site development.”¹ Brown and Judson began growing citrus in Redlands between 1878 and 1882 using meager local water supplies. Brown formed the Bear Valley Land and Water Company (BVLWC) in the early 1880s and constructed the Big Bear Dam in 1883. After successfully creating Big Bear Lake, at that time the largest man-made reservoir in the world, water began flowing from the dam through a series of flumes and canals to Redlands orchards in 1885. This demonstration led locals to believe that the area could be successfully irrigated using water brought in from the mountains to the north.

The potential for Big Bear Lake seemed enormous because the winters between 1875 and 1885 were some of the wettest winters on record. Brown assumed that the abundance of water stored in the reservoir in those years was typical and would continue as such. With little knowledge of precipitation fluctuations in southern California, water supplies appeared unlimited and Brown and others fostered grandiose schemes for attracting moneyed investors. Between 1889 and 1890, Brown began trading stocks from his own companies to develop land south of Redlands and consolidate his water rights. After organizing the BV&A in 1889, Brown and his associates bought all of the BVLWC stock individually. They then incorporated the Bear Valley Irrigation Company (BVIC), which bought all of the original BVLWC stock, including the dam, from the BV&A.²

Frank Brown hoped to duplicate the success of the City of Redlands, which by 1890 was a thriving commercial citrus center located along an established railroad right-of-way. Turning his attention to the valley south of Redlands, a 280-acre town site was named the Town of Moreno. Initially, the town was to have been named New Haven, after New Haven, Connecticut where many of the investors, including Brown, were from. However, to honor Brown, the name Moreno, which is the Spanish word for “brown,” was chosen. North-south streets in the BV&A development in Moreno and Alessandro were named for the corporation leaders, while east-west streets were named for plant and tree species common in California at the time. Hopes were high that Moreno would prosper and local newspapers in 1891 declared that “Moreno will be a rail road town in the future [which has] every advantage of the most favored locality in Southern California and the disadvantages of none.”

In April 1891, it was estimated that between 1,500 and 2,000 people went to the new town site of Moreno to purchase town lots being sold at public auction. In the following eight months, a Congregational Church, four brick commercial buildings, a lumberyard, two brickyards, a cement pipe works, and a school were constructed with as many as “thirty houses being built at one time.”

By 1893, the Hotel de Moreno, three stories high and encompassing an entire city block, was operational and doing a brisk business with people needing a place to stay while developing their land. Investors interested in Moreno Valley land were from nearby locations, Los Angeles, San Diego, San Bernardino, and from as far away as Wisconsin, Pennsylvania, and New York. A map was

¹ *Cultural Resources Assessment*, Michael Brandman Associates, Inc., September 2014.

² *Ibid.*

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created to show potential buyers what types of irrigation systems would be built and where the land was located.¹

d. Moreno Valley After 1893

Moreno had become a small boomtown with new businesses developing, and orchards and crops being planted on nearby fields. The success for both local businesses and the farmers depended on the availability and consistency of water. Although Brown had studied the feasibility of bringing water into the Valley and had initially been successful piping water from Bear Valley, by 1893 Brown and others realized that without a higher dam, the reservoir could not hold enough water to meet the irrigation needs of Redlands and Moreno. To worsen the situation for Moreno, Redlands was the town for whom the reservoir was initially built and therefore had first rights to the water. A legal suit won by Redlands in 1894, in effect permanently shut off the water to Moreno, although a local judge ordered that domestic water to Moreno homes must be reinstated.²

In addition to the lack of water, it is likely that the Recession (Panic) of 1893 forced many potential farmers in southern California to reconsider their options, and new farmers went out of business. The Panic was caused by railroad overbuilding and speculation, much of which was driven by westward expansion into California. According to several sources, over 15,000 businesses and 500 banks failed during this period, many of them in California. The Northern Pacific Railway, the Union Pacific Railroad, and the Atchison, Topeka & Santa Fe Railroad all failed. The resultant depression lasted for three years and farmers went bankrupt nationwide; good economic times did not resurface until about 1899. By that time, the speculative land boom in this part of Southern California was over.

The City remained a rural agricultural community for many decades, until after World War II. The expansion of the Federal freeway system and housing boom following the war led to the start of suburbanization in the Moreno Valley area that slowly converted agricultural land to new homes, shopping centers, etc. In the 1990s at one time, Moreno Valley was one of the fastest-growing communities in the nation. The older agriculture-oriented towns of Alessandro and Moreno gave way to suburban residential neighborhoods. By 2010, “Moreno” had suburban development to the west and agricultural fields to the east.

Alessandro Boulevard. In connection with the development of the Town of Moreno in the 1890s as part of the Bear Valley and Alessandro Development Company’s real estate venture, Alessandro Boulevard was constructed across much of the project site. The roadway has been in continuous use in largely its same location since that time. In 1988, the City adopted Resolution CPAB 88-2 recognizing the landmark status of this roadway and providing for the preservation of its 120-foot right-of-way through the City.

4.5.1.6 NOP/Scoping Comments

The Sierra Club expressed concern about how the project would affect Native American sites in this area, as well as the agricultural history of this area. In addition, Susan Nash provided information about the route that Juan Bautista de Anza took through the San Jacinto Valley and the project site on his travels from San Diego to points north. These comments are addressed in this section of the EIR.

¹ Ibid.
² Ibid.

4.5.2 Existing Policies and Regulations

4.5.2.1 Federal Regulations

National Historic Preservation Act (NHPA) of 1966 (as amended), Section 106. The NHPA declares a national policy of historic preservation to protect, rehabilitate, restore, and reuse districts, sites, buildings, structures, and objects significant in American architecture, history, archaeology, and culture. The NHPA established the National Register of Historic Places (National Register), State Historic Preservation Offices (SHPOs) and programs, and the Advisory Council on Historic Preservation. This Act applies to all properties on or eligible for inclusion in the National Register. The Section 106 review process requires consultation to mitigate damage to “historic properties” (defined per 36 CFR 800.16[1] as places that qualify for the National Register), including Native American traditional cultural places (TCPs). Evaluation of cultural resources consists of determining whether it is significant (i.e., whether it meets one or more of the criteria for listing in the National Register). These eligibility criteria are defined in 36 CFR 60.4 as follows:

The quality of significance in America history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association:

- A. That is associated with events that have made a significant contribution to the broad patterns of our history;
- B. That is associated with the lives of persons significant in our past;
- C. That embodies the distinctive characteristics of a type, period or method of construction, or that represents the work of a master, or possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- D. That has yielded, or may be likely to yield, information important to prehistory or history.

4.5.2.2 State Regulations

California Environmental Quality Act. An “historic resource” includes, but is not limited to, any object, building, site, area, place, record, or manuscript that is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.¹ CEQA mandates that lead agencies consider a resource “historically significant” if it meets the criteria for listing in the California Register of Historic Resources (California Register). Such resources meet this requirement if they (1) are associated with events that have made a significant contribution to the broad patterns of California history, (2) are associated with the lives of important persons in the past, (3) embody distinctive characteristics of a type, period, region, or method of construction, and/or (4) represent the work of an important creative individual or possesses high artistic value.² These criteria mimic the criteria utilized to determine eligibility for the National Register.

In addition, Public Resources Code Section 21083.2 and *CEQA Guidelines* Section 15064.5(f) recognize that historical or unique archaeological resources other than potential Native American burials may be accidentally discovered during project construction. This guideline recommends that immediate evaluation defined by qualified archaeologists be included in mitigation measures. This guideline also recommends that if the find is determined to be a historical or unique archaeological resource, that contingency funding and time allotments sufficient to allow for implementation and avoidance measures be available.

¹ Public Resources Code, Section 5020.1(j).

² Public Resources Code, Section 5024.1(c).

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Senate Bill 18. Signed into law in September 2004, and effective March 1, 2005, SB 18 permits California Native American tribes recognized by the Native American Heritage Commission (NAHC) to hold conservation easements on terms mutually satisfactory to the tribe and the landowner. The term “California Native American tribe” is defined as “a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC.”

The bill also requires that, prior to the adoption or amendment of a city or county’s general plan, the city or county consult with California Native American tribes for the purpose of preserving specified places, features, and objects located within the city or county’s jurisdiction. SB 18 also applies to the adoption or amendment of specific plans. This bill requires the planning agency to refer to the California Native American tribes specified by the NAHC and to provide them with opportunities for involvement.

California Health and Safety Code. The California Health and Safety Code Section 7050.5 states that if human remains are discovered on site, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition. If the Coroner determines that the remains are not subject to his or her authority and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. This regulation is applicable to any project where ground disturbance would occur.

4.5.2.3 City of Moreno Valley General Plan Policies

The General Plan defines goals and policies related to cultural resources within the City of Moreno Valley. The Chapter 9 Goals and Policies section provides the following guidelines to City staff:

Objective 7.6: Identify and preserve Moreno Valley’s unique historical and archaeological resources for future generations.

Policies in Response to Objective 7.6:

- 7.6.1) Historical, cultural and archaeological resources shall be located and preserved, or mitigated consistent with their intrinsic value.
- 7.6.2) Implement appropriate mitigation measures to conserve cultural resources that are uncovered during excavation and construction activities.
- 7.6.3) Minimize damage to the integrity of historic structures when they are altered.
- 7.6.4) Encourage restoration and adaptive reuse of historical buildings worthy of preservation.
- 7.6.5) Encourage documentation of historic buildings when such buildings must be demolished.

To help define when a cultural resource becomes “significant” within the context of Moreno Valley history, a professional cultural resource manager must conduct an assessment with consideration of an appropriate threshold. Certain cultural resources will have an intrinsic value to the City. City policy suggests that significant cultural resources uncovered during project-related excavation and construction activities should be preserved and/or mitigated to the extent feasible consistent with their intrinsic value.

Prehistoric sites on Mount Russell are located within lands under the jurisdiction of the City and the County of Riverside are part of an unofficial prehistoric district known as the Wolfskill Ranch North

Complex, and its general location has been published in the Moreno Valley General Plan Final EIR.¹ Page 5.10-14 of the Moreno Valley General Plan Final EIR notes that the North Complex is located on Open Space and that a project’s potential effect to all prehistoric cultural resources in the City, including those of the Wolfskill complex, is considered a significant impact.

4.5.3 Methodology

4.5.3.1 Phase 1 Research

a. Cultural Resource Assessment

Over the past ten years, a number of cultural resource assessments have been conducted on the project site and in surrounding areas. The following information summarizes the results of those surveys as described in Tables 1 and 2 from the Cultural Resources Assessment conducted for the project. There are 45 archaeological Native American and historical resource sites in the general area of the project, with most being milling features or slicks in the Mount Russell area.²

Table 4.5.A lists 11 sites were identified in the southwest portion of the project site, which is designated “Open Space” in the Specific Plan and will not be disturbed. These sites are all milling features associated with the Mount Russell Range and will not be affected by development of the project.

Table 4.5.A: Cultural Resources Identified in the Southwest Portion of the Project Site

CA-RIV-610	CA-RIV-3238	CA-RIV-3345	CA-RIV-8006
CA-RIV-860	CA-RIV-3343	CA-RIV-3346*	CA-RIV-8007**
CA-RIV-2993	CA-RIV-3344	CA-RIV-3347	

* Includes a midden.

** Renamed from CA-RIV-2775, 2776, and 2777.

It should be noted that the cultural assessments for the project do not show the specific locations of the cultural resource sites. This information is restricted from the public, and is considered confidential and protected under CEQA, to protect the resources from illegal or inappropriate damage or theft. The project’s Cultural Resources Assessment fulfills the requirements of CEQA as outlined in Section 4.5.6.2, *Significant Impacts*. (See, e.g. *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200.)

The project’s cultural assessments also found five sites within the project area during previous excavations for the MWD pipeline (four sites) and the EMWD Gilman tunnel (the fifth site CA-RIV-6200) that will not be affected by development within the project.³

- CA-RIV-6065 (P33-8168);
- CA-RIV-6066 (P33-8169);
- CA-RIV-6067 (P33-8170);
- CA-RIV-6068 (P33-8171); and
- CA-RIV-6200 (P33-8709).

¹ City of Moreno Valley General Plan EIR, 2006

² *Cultural Resources Assessment*, Michael Brandman Associates, Inc., September 2014.

³ Ibid.

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All of these sites are buried prehistoric Native American artifacts found during trench work except CA-RIV-6200, which was a deeply buried hearth (21 feet below ground surface). All of these resources remain in their original locations and will not be disturbed by the development of the project.

Four (4) historic-era cultural resource sites were identified within the project site in areas that could be affected by development as outlined in Tables 1 and 2 from the project cultural assessment:¹

- CA-RIV-4201H (historic foundation remnants and trash);
- CA-RIV-4210H (old farm location);
- CA-RIV-5862 (historic era 2-room farmhouse); and
- P33-11621 (historic farmstead in the open space area of the project).

CA-RIV-4201H consists of historic foundation remnants and historical trash (e.g., bottles, nails, and broken dishes) along Virginia Street. Old topographic maps and photographs show a historic farm complex here. This site was Phase 2 tested by MBA in 2011 and found to be not significant according to CEQA criteria. CA-RIV-4210H consists of a historic structure, foundations, and trash deposits. Old topographic maps and photographs show a farm complex at this location. The MBA report indicates this site was Phase II-tested and found to be not significant under CEQA. CA-RIV-5862 consists of a historic era two-room farm structure, but it is on MWD property and is not considered a significant cultural resource under CEQA. P33-11621 is a historic farmstead but is within the open space property in the southern portion of the project site and will not be directly affected by construction within the project.²

In addition, there are seven rural residential properties within the project site that may contain historic buildings or resources, but these are private property and MBA staff did not access them and no detailed assessment was conducted. The Specific Plan designates these properties as “Light Logistics” and they will eventually be developed. There is evidence that at least one structure located east of Redlands Boulevard and north of Brodiaea Avenue was built around 1900. These sites will be investigated in connection with any development proposals affecting these properties.

In November 1988, the Cultural Preservation Advisory Board (CPAB) of the City of Moreno Valley designated the entire length of Alessandro Boulevard as a City Historical Landmark (Resolution CPAB 88-2). At that time, the CPAB made the alignment, right-of-way, and name of Alessandro part of the historical designation. Alessandro Boulevard was first established in 1890 and over the years has served as a San Bernardino County Road, Riverside County Road, a California State Highway, part of the transcontinental U.S. Route 60, part of the “Jack Rabbit Trail,” and a City boulevard (Hamner 2003). Resolution CPAB 88-2 was adopted to ensure the maintenance, enhancement, or protection of a street of historical significance. Over the years, various portions of Alessandro Boulevard have been modernized to enhance traffic flow throughout the City, but the original routing has remained unchanged.

4.5.3.2 Phase II Testing

Based on the results of Phase I survey work on a portion of project-related lands (i.e., plowed and vacant parcels) performed in August and September of 2005, Phase II testing of certain prehistoric cultural resources, located in the southwest portion of the site, was undertaken in the summer of 2006. A monitor representing the Soboba Band of Luiseño Indians was in attendance. Additional properties in the Specific Plan were surveyed in the summer and fall of 2007. The last pieces of agricultural land within the Specific Plan boundary were surveyed in July 2011. Known as the Lee

¹ Ibid.

² *Cultural Resources Assessment*, Michael Brandman Associates, Inc., April 24, 2012.

Property, these exhibited two previously recorded historic-era cultural resources. MBA also re-located prehistoric archaeological site CA-RIV-3347 during the July 2011 survey. The Phase I surveys had revealed three historic-era cultural resource sites, ten prehistoric-era cultural resource sites, and six isolated artifacts located within the boundaries of the project, but not in areas planned for development within the Specific Plan. Each resource was recorded.

In early 2006, a subsurface significance-testing program (Phase II testing) on a series of nine prehistoric cultural resources located at the southwest portion of the project site was conducted to determine if these resources should be considered significant under CEQA. The Phase II-tested sites included:

- CA-RIV-610
- CA-RIV-860
- CA-RIV-3238
- CA-RIV-3343
- CA-RIV-3344
- CA-RIV-3345
- CA-RIV-3346
- CA-RIV-8006
- CA-RIV-8007

NOTE: The following changes have been made due to revision to the Specific Plan project size.

All of these sites are milling features, and CA-RIV-8006 and -8007 are milling slicks. The testing work revealed that only one of these sites exhibited evidence of intact subsurface cultural resources (CA-RIV-3346). For this reason, CA-RIV-3346 should be considered a significant cultural resource for the purposes of CEQA.¹ MBA also determined that the other eight prehistoric sites lacked additional subsurface resources.² The MBA report concluded that development of the Specific Plan would not impact the nine prehistoric sites, so no further research on these sites was recommended unless the project created proposed physical disturbance (grading) of these areas.³ The 74.3 acres of open space shown in the Specific Plan (previously referenced Figure 3.8) encompasses all of the nine prehistoric sites identified by MBA. Therefore, development under the project will not have a significant impact on archaeological resources.

Several buried and isolated prehistoric resources were detected during the monitoring phase of the Highland Fairview Corporate Park Project,⁴ located adjacent to the northern edge of the Specific Plan. Likewise, several buried sites adjacent to Davis Road were detected in connection with the 1998 Inland Feeder Project by MWD. Given previous finds in the project area, MBA concluded that certain portions of the project site have a “high” and “moderate” probability of containing significant buried cultural resources, while other areas of the project site have a “low” probability of containing significant buried cultural resources. The high probability areas are within 1,000 feet of the base of the southwestern foothills, while the moderate probability areas are within 2,000 feet of the same area

4.5.3.3 Native American Consultation (SB 18)

MBA contacted the NAHC in March 2011 requesting a Sacred Lands File search for the project area in order to determine if there were records of cultural resources in the area. The response from the NAHC was received on March 25, 2011, indicating that no sacred lands or traditional cultural properties are known to the NAHC within the 3,714 acres of the project area, including the Specific Plan area, Conservation Areas, and Public Facilities. However, other cultural sites have been found in the uplands outside of the project area (i.e., Lake Perris National Recreation Area to the southwest and the San Jacinto Wildlife Area to the south).

¹ Ibid.

² Ibid.

³ Ibid.

⁴ *Cultural Resources Assessment*, Michael Brandman Associates, Inc., April 24, 2012.

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Pursuant to SB 18, on February 29, 2012, MBA sent information-request letters to each of the 11 tribal entities identified by the NAHC (see previously referenced Table 2.C for a summary of the correspondence in this regard). In response, two tribes requested government-to-government consultation under SB 18 during the 90-day notification period (Pechanga and Soboba). The City met with the Pechanga Tribe on May 30, 2012, and with the Soboba Tribe on November 27, 2012. No other Native American entities requested a government-to-government consultation meeting. In addition, several tribes provided information to the City regarding cultural resources to be included in the EIR but did not include a consultation request.

4.5.3.4 Paleontological Contacts

MBA contacted Eric Scott of the Division of Geological Sciences of the San Bernardino County Museum on June 2005 requesting a paleontological records check of the original Moreno Highlands Specific Plan area. Mr. Scott's paleontological review showed that the project area rests entirely on exposures of Holocene (Recent) alluvium and granitic bedrock. Both the alluvium and the bedrock have low potential for fossil deposits to be uncovered during grading. However, the Holocene alluvium rests upon a veneer of Older Pleistocene alluvium and San Timoteo Formation deposits, both of which are highly sensitive for fossil resources.

MBA's monitoring work at the Highland Fairview Corporate Park project, located north and adjacent to this project area, included monitoring for paleontological resources. During construction of the Highland Fairview Corporate Park, it was shown that shallow soils (0 to 20 feet) did not contain paleontological resources. Therefore, MBA recommends that full-time paleontological monitoring on this project should take place only in those portions of the project where earthmoving occurs 20 feet or more below existing grade.

4.5.4 Thresholds of Significance

4.5.4.1 Importance of Cultural Resources

Prior to determining whether a cultural resource is significant under *CEQA Guidelines* and therefore subject to mitigation, a threshold of significance must be developed prior to testing/evaluation. This procedure is recommended by the Office of Historic Preservation (OHP)/State Prehistoric Preservation Officer (SHPO). The threshold of significance is simply a point where the qualities of significance are defined during the analysis such that the resource can be defined as a historical resource. An adverse effect to a historic resource is regarded as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource will be reduced such that it no longer meets the significance criteria. In lay terms, should an analysis show that future development will destroy elements that make the cultural resource historical, but leave non-unique elements intact, then the significance of the resource will be lost and there must be mitigation for that loss.

CEQA Section 15064.5, Determining the Significance of Impacts to Archaeological and Historical Resources, states that:

"Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) including the following:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- (B) Is associated with the lives of persons important in our past;

- (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (D) Has yielded, or may be likely to yield, information important in prehistory or history.”

If a prehistoric cultural resource is tested, it is traditionally held that buried features such as hearths, burials, and middens could hold analytical information that will pass the significance threshold and make the site eligible for the cultural resource under Criterion D alone (listed above) For resources created after the historic period began (post-1769 AD) and which are at least 45 years old, analysis of the condition and integrity of exposed features may cause the resource to pass Criterion A, B, C, and/or D thresholds (shown above).

For buildings and other structures at least 45 years old, the completeness and integrity of the structural architecture may cause the site to pass Criterion A, B, and/or C thresholds. The threshold should be associated with the site context or theme. If sets of unusual artifacts, buried but unusual buildings, or human remains are detected during tests of cultural resources in the project site, or if a historical review of the resource finds that it was once associated with a person and/or event of historical significance at the State/National level, such resources will likely be considered potentially significant for California Register/National Register listing. In the event that the significance of the historical resource will be reduced below the threshold because of development, feasible mitigation must be developed.

4.5.4.2 Definition of Cultural Resource Sites and Isolates

Prehistoric and historic cultural resources can vary in form and function from area to area, but it is a “site” as opposed to isolated artifacts and certain features that must be considered significant. Prehistoric and historic cultural resource sites are defined in this study as three or more items, such as lithics, stone tools, glass, cans, etc., that are not from a single source or material found within a 10 square meter area. There is no limit to the physical size of a site.

Sites that could qualify as significant are typically more than 45 years old or have the potential to be more than 45 years old. These definitions assume that items found in an area with a diversity of materials can represent more than a single activity at a location. Discrete components of a site may be identified to represent repeated activity, such as milling stations, hearths, or isolated structures. Isolated artifacts and certain isolated features do not meet these minimal criteria. Isolates could consist of one or two cans, stone flakes, one metate fragment or fence posts, brass section markers, or well heads. Potential impacts to isolates need not be mitigated.

4.5.4.3 CEQA Thresholds

Based on Appendix G of the *CEQA Guidelines*, the effects of a project on cultural resources are considered to be significant if the project would:

- Cause a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; and/or
- Result in any disturbance of human remains, including those interred outside of formal cemeteries.

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4.5.5 Less than Significant Impacts

The following impacts were determined to be less than significant. In each of the following issues, either no impact would occur (therefore, no mitigation would be required) or adherence to established regulations, standards, and policies would reduce potential impacts to a less than significant level.

4.5.5.1 Human Remains

Threshold	Would the proposed project disturb any human remains, including those interred outside of formal cemeteries?
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The project site is currently undeveloped. No evidence suggesting the project site has been utilized in the past for human burials has been identified. In the unlikely event that human remains are discovered during grading or construction activities within the project site, compliance with State law (Health and Safety Code § 7050.5) (HSC § 7050.5) would be required. These requirements are imposed on any construction activity in which human remains are detected, and include the following provisions:

- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required; and
 - If the coroner determines the remains to be Native American:
 - The coroner shall contact the Native American Heritage Commission within 24 hours.
 - The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
 - The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code § 5097.98 (PRC § 5097.98), or
 - Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further and future subsurface disturbance pursuant to PRC § 5097.98(e).
 - The NAHC is unable to identify a most likely descendant.
 - The most likely descendant is identified by the NAHC, fails to make a recommendation within 48 hours of being granted access to the site; or
 - The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

There is a small possibility that ground-disturbing activities during construction may uncover previously unknown buried human remains. In the event of an accidental discovery or recognition of any human remains, California State Health and Safety Code § 7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to CEQA regulations and PRC § 5097.98. Compliance with existing State law would ensure that impacts related to the discovery of buried human remains would be less than significant and no mitigation is required.

4.5.6 Significant Impacts

The following potential impacts were determined to be potentially significant. In each of the following issues, mitigation measures have been recommended to reduce the significance of impacts.

4.5.6.1 Archaeological Resources

Impact 4.5.6.1: *The proposed project has the potential to affect known or previously undetected subsurface archaeological resources.*

Threshold	Would the proposed project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
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NOTE: The following changes have been made due to revision to the Specific Plan project size.

Review of all cultural resource factors in and near the project site suggests that the project site is sensitive for archaeological resources in the southwestern portion of the site and the Specific Plan has set aside these 74.3 acres as open space (Planning Area 30) to permanently protect these resources. There is no evidence that any other cultural resources are located in or near the project area; however, two tribes indicated a desire to consult with the City under SB 18 regarding the potential of such resources on the site.

The nine prehistoric cultural resources located near the southwestern portion of the project site were Phase II tested for significance: CA-RIV-610, CA-RIV-860, CA-RIV-3238, CA-RIV-3343, CA-RIV-3344, CA-RIV-3345, CA-RIV-3346, CA-RIV-8006, and CA-RIV-8007. Of these nine sites, only CA-RIV-3346 (milling features and a “midden”) is considered a significant resource under *CEQA Guidelines* because it exhibited evidence of intact subsurface cultural resources (MBA 2014). The project cultural assessment concluded that all the identified prehistoric sites are outside of the development area of the Specific Plan and thus there would be no significant impact to archaeological resources from the proposed development.

Unknown Cultural Resources. It is possible that unknown cultural resources could be discovered during project-related construction. The land within 1,000 feet of exposed granitic bedrock outcrop areas in the southwesterly corner of the project is considered to have “high” sensitivity, while areas located within 2,000 feet of this area are considered to have “moderate” sensitivity. The remainder of the site is considered to have “low” sensitivity for cultural resources. As set forth below, a qualified archaeologist should be retained by the City to monitor any earthmoving in the areas of high and moderate sensitivity.

In addition, a number of project-related improvements, including the SR-60/Theodore Street interchange, SR-60/Gilman Springs Road interchange, three reservoir sites, water, sewer, and storm drain connections, debris basins, etc. are off site and cultural surveys will be conducted when specific sites are identified for these off-site improvements.

Project or Specific Plan Design Features. The 74.3-acre open space area in the southwest corner of the WLCSP encompasses the entire foothill area some of which is considered sensitive for archaeological resources. This area is designated as Open Space in the Specific Plan and only the extension of Cactus Avenue and passive open space uses will be permitted in this area. The updated cultural report by MBA determined that potential impacts to cultural resources from constructing Cactus Avenue through this area could be reduced to less than significant levels by the implementation of the mitigation measures already proposed for project grading (MM 4.5.6.1C through 4.5.6.1E).

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The following mitigation measure had been revised in response to Comments A-3-23 in Letter A-3 from the Pechanga Temecula Band of Luiseño Mission Indians, A-5-6 in Letter A-5 from Soboba Band of Luiseño Indians, et al.

Mitigation Measures. The following measures are proposed to help reduce potential impacts on known, unknown, or potential archaeological or historical resources to less than significant levels. The wording of the measures has been changed from the Original DEIR to address specific comments made by the Pechanga Tribe. The Tribe did request that the survey area limitations outlined in Measures 4.5.6.1C and 4.5.6.1D be removed. After consultation with the project archaeologist the measures have been modified to refer to specific planning areas within the WLC Specific Plan as shown below:

4.5.6.1A Prior to the approval of any grading permit for any of the “Light Logistics” parcels, the parcels shall be evaluated for significance by a qualified archaeologist. A Phase 1 Cultural Resources Assessment shall be conducted by the project archaeologist and an appropriate tribal representative(s) on each of the “Light Logistics” parcel to determine if significant archaeological or historical resources are present.

A Phase 2 significance evaluation shall be completed for any of these sites in order to determine if they contain significant archaeological or historical resources. Cultural resources include but are not limited to stone artifacts, bone, wood, shell, or features, including hearths, structural remains, or historic dumpsites. All resources determined to be prehistoric or historic shall be documented using DPR523 forms for archival research/storage in the Eastern Information Center (EIC). If the particular resource is determined to be not significant, no further documentation is required. If prehistoric resources are determined to be significant, they shall be considered for relocation or archival documentation. If any resource is determined to be significant, a Phase 3 recovery study shall be conducted to recover remaining significant cultural artifacts. If prehistoric archaeological/cultural resources are discovered during the Phase 1 survey and it is determined that they cannot be avoided through site design, they shall be subject to a Phase 2 testing program. The project archaeologist in consultation with appropriate tribal group(s) shall determine the significance of the resource(s) and determine the most appropriate disposition of the resource(s) in accordance with applicable laws, regulations and professional practices (per Cultural Report MM CR-1, MM CR-2, MM CR-7 Table 3, pg.74).

4.5.6.1B Prior to the issuance of any grading or ground-disturbing permit for construction of off-site improvements a qualified archaeologist shall be retained to prepare a Phase I cultural resource assessment (CRA) of the project site if an up to date Phase I cultural resource assessment is not available for the site at the time of development per Cultural Report MM CR-5, Table 3, pg.74).

Appropriate tribal representatives as identified by the City shall be invited by the Project Archeologist to participate in this assessment.

If archaeological resources are discovered during construction activities, no further excavation or disturbance of the area where the resources were found shall occur until a qualified archaeologist evaluates the find. If the find is determined to be a unique archaeological resource, appropriate action shall be taken to (a) plan construction to avoid the archeological sites (the preferred alternative); (b) cap or cover archeological sites with a layer of soil before building on the affected project location; or (c) excavate the site to adequately recover the scientifically consequential information from and about the resource. At the discretion of the project archaeologist, work may continue on other parts of the project site while the unique archaeological resource mitigation takes place. This measure shall be implemented to the satisfaction of the Planning Official.

If the project archaeologist, in consultation with the monitoring Tribe(s), determines that the find is a unique archaeological resource, the resource site shall be evaluated and recorded in accordance with requirements of the State Office of Historic Preservation (OHP). If the resource is determined to be significant, data shall be collected by the qualified archaeologist and the findings of the report shall be submitted to the City. If the find is determined to be not significant no mitigation is necessary.

Should a future project-level analysis show that cultural resource site CA-RIV-3346 will be directly or partially impacted by project-level construction, an Addendum cultural resource report must be prepared and include an analysis of the alternatives associated with mitigation for impacts to this resource following CEQA Guidelines Section 15126.4(b)(3). This information must be included in any project-level CEQA compliance documentation. It should be noted that Phase 3 data recovery is an acceptable mitigation action under CEQA Guidelines Section 15126.4(b)(3)(C) (per Cultural Report MM CR-3, Table 3, pg.74).

Should it be determined through a future project-level EIR analysis that prehistoric cultural resource sites CA-RIV-2993 and/or CA-RIV-3347 shall be directly impacted by future construction, these sites must be Phase 2 tested for significance (per Cultural Report MM CR-4, Table 3, pg.74).

4.5.6.1C Prior to the issuance of any grading permits a qualified archaeologist shall be retained to monitor all grading and shall invite tribal groups to participate in the monitoring. Project-related archaeological monitoring shall include the following requirements per Cultural Report MM CR-6, MM CR-8, Table 3, pg.74):

1. All earthmoving shall be monitored to a depth of ten (10) feet below grade by the Project Archaeologist or his/her designated representative. Once all areas of the development project that have been cut to 10 feet below existing grade have been inspected by the monitor, the Project Archaeologist may, at his or her discretion, terminate monitoring if and only if no buried cultural resources have been detected;
2. If buried cultural resources are detected, monitoring shall continue until 100 percent of virgin earth within the specific project area has been disturbed and inspected by the Project Archaeologist or his/her designated representative.
3. Grading shall cease in the area of a cultural artifact or potential cultural artifact as delineated by the Project Archaeologist or his/her designated representative. A buffer of at a minimum 25 feet around the cultural item shall be established to allow for assessment of the resource. Grading may continue in other areas of the site while the particular find are investigated; and
4. If prehistoric cultural resources are uncovered during grading, they shall be Phase 2 tested by the Project Archaeologist, and evaluated for significance in accordance with §15064.5(f) of the CEQA Guidelines. Appropriate actions for significant resources as determined by the Phase 2 testing include but are not limited to avoidance or capping, incorporation of the site in green space, parks, or delineation into open space. If such measures are not feasible, Phase 3 data recovery of the significant resource will be required, and curation of recovered artifacts and/or reburial, shall be required. A report associated with Phase 2 testing or Phase 3 data recovery must be delivered to the City and, if necessary, the museum where any recovered artifacts have been curated.
5. No further grading shall occur in the area of the discovery until the City approves specific actions to protect identified resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the City where they would be afforded long-term preservation to allow future scientific study.

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6. The developer shall make reasonable efforts to avoid, minimize, or mitigate significant adverse impacts on cultural resources. The State Historic Preservation Office (SHPO) and local Native American tribes will be consulted and the Advisory Council on Historic Preservation will be notified within 48 hours of the find in compliance with 36 CFR 800.13(b)(3). This measure shall be implemented to the satisfaction of the Planning Official.

4.5.6.1D Prior to the issuance of any grading permit the project archaeologist shall invite interested Tribal Group(s) representatives to monitor grading activities. Qualified representatives of the Tribal Group(s) shall be granted access to the project site to monitor grading as long as they provide 48-hour notice to the developer of their desire to monitor, so the developer can make appropriate safety arrangements on the site. This measure shall be implemented to the satisfaction of the Planning Official.

4.5.6.1E It is possible that ground-disturbing activities during construction may uncover previously unknown, buried cultural resources (archaeological or historical). In the event that buried cultural resources are discovered during grading and no Project Archaeologist or Historian is present, grading operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be retained to determine the most appropriate course of action regarding the resource. The Archeologist shall make recommendations to the City on the actions that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with §15064.5 of the *CEQA Guidelines*. Cultural resources could consist of, but are not limited to, stone artifacts, bone, wood, shell, or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of CEQA criteria. If the resources are determined to be unique historic resources as defined under §15064.5 of the *CEQA Guidelines*, appropriate protective actions for significant resources such as avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds shall be implemented by the project archaeologist and the City.

No further grading shall occur in the area of the discovery until the City and project archaeologist approve the measures to address these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the City where they would be afforded long-term preservation to allow future scientific study.

Level of Significance After Mitigation. Adherence to **Mitigation Measures 4.5.6.1A** through **4.5.6.1E** will reduce potential impacts to archaeological resources to less than significant levels.

4.5.6.2 Historic Resources

Impact 4.5.6.2: *The proposed project has the potential to directly or indirectly affect local historical resources.*

Threshold	Would the proposed project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the <i>State CEQA Guidelines</i> ?
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The California Register of Historical Resources. The California Register criteria are based on National Register criteria. For a property to be eligible for inclusion in the California Register, one or more of the following criteria must be met:

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1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The California Register requires that a resource possess integrity, which is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance” (California Office of Historic Preservation 1999). To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Which of these factors is most important depends on the particular criterion under which the resource is considered eligible for listing (California Office of Historic Preservation 1999).

The prehistoric sites recorded within or adjacent to the project boundaries are typical example of common resource type; a prehistoric milling complex lacking temporally diagnostic artifacts or a “single-use resource extraction and processing location.” Although broadly associated with prehistoric Native American occupation, the sites do not represent unique archaeological information. The sites are not associated with significant events or persons, and do not embody distinctive characteristics of a type, period, or method of construction, nor do they appear to have the potential to yield information important in prehistory. Therefore, they do not meet any of the above criteria and are not eligible for listing in the California Register. However, they do constitute locally important examples of Native American activity and are not considered a historical resource under CEQA. Impacts to these sites relative to Native American resources are addressed in more detail in Section 4.5.6.1, *Archaeological Resources*.

The project site contains two previously identified historic sites: CA-RIV-4201H and CA-RIV-4210H. Both of these are historic-era homesteads and previously contained farm buildings and related out-buildings. They were located in the eastern portion of the Specific Plan, but MBA could find no remains of these facilities or related artifacts. The MBA report concludes the buildings were demolished and/or their materials removed for disposal or reuse at some point in the past.

There are seven rural residential structures and associated out-buildings currently present on the project site, and one (APN 478-220-009) near Redlands Boulevard contains a farm building that was built around 1900 and may be one of the oldest surviving buildings of the historic Moreno community.¹ No other evidence of past structures or unique features was identified; however, access to the seven rural residential properties was not available at the time of survey, and it appears from general observations, historical aerial photographs, and historical records that one or more of these buildings may be older than 40 years. Without more information, there is a possibility that removal of these buildings could represent a significant impact to historic structures, features, or resources, and mitigation is required.

Local Historical Resources: Alessandro Boulevard. In connection with the development of the Town of Moreno in the 1890s as part of the Bear Valley and Alessandro Development Company’s real estate venture, Alessandro Boulevard was constructed across much of the project site. The roadway has been in continuous use in largely its same location since that time. In 1988, the City adopted Resolution CPAB 88-2 recognizing the landmark status of this roadway and providing for the preservation of its

¹ *Cultural Resources Assessment*, Michael Brandman Associates, Inc., April 24, 2012.

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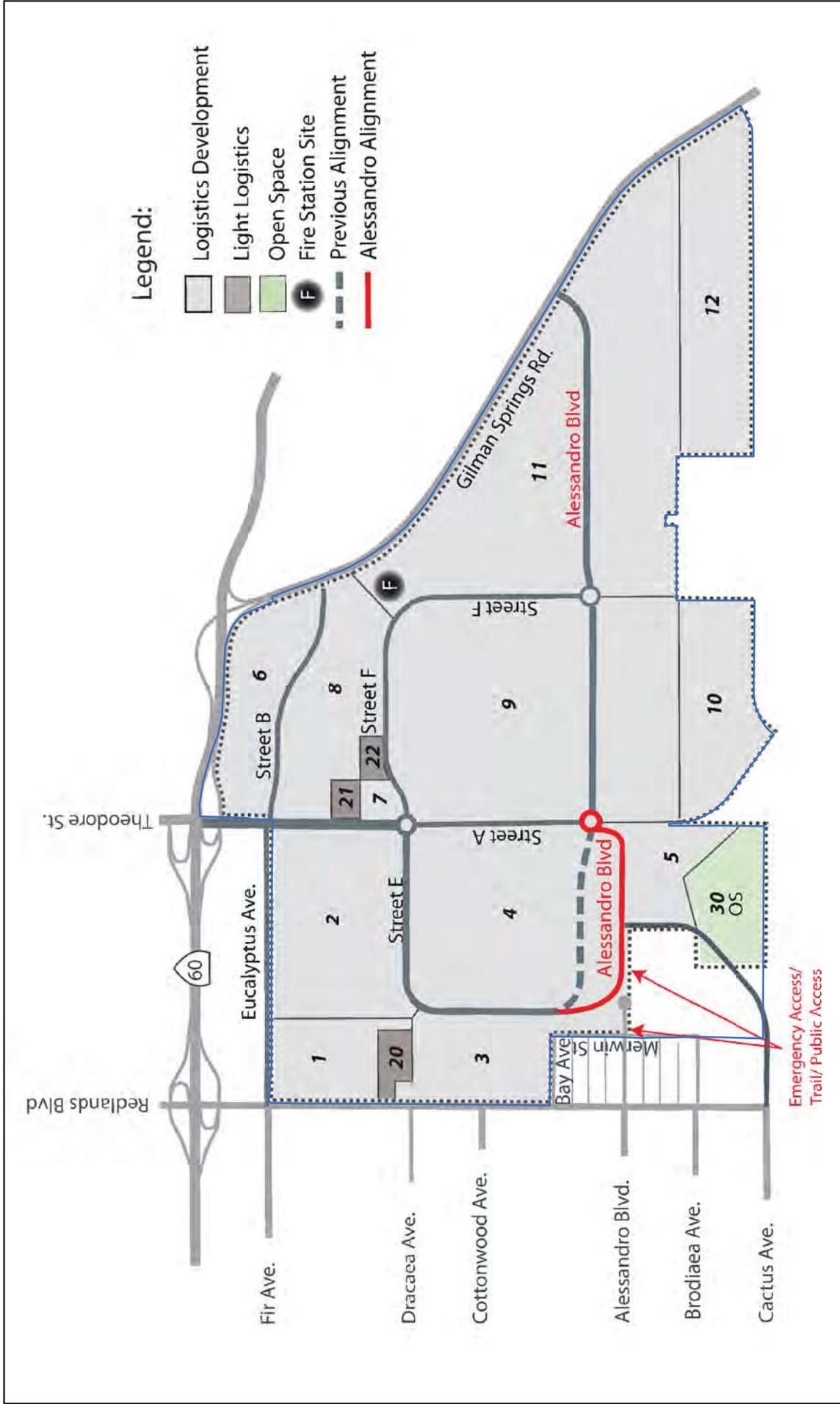
120-foot right-of-way through the City. Alessandro Boulevard was designated as a City Historic Landmark in 1988 “assure the maintenance, enhancement, or protection of a street of historical significance.” Over the years, various portions of Alessandro Boulevard have been modernized to enhance traffic flow throughout the City, but the original routing has remained unchanged. Alessandro Boulevard within the WLCSP would retain its original alignment but the roadway would be enhanced to serve modern traffic needs. This has been done in multiple areas along Alessandro Boulevard in the past to better serve the needs of the community (i.e., Streets C and E originally indicated in the DEIR and Specific Plan that circulated for public review). See Figure 4.5.1. Based on these project revisions, the proposed WLCSP will not affect the integrity of the landmark status, as the significance of the Landmark status is associated with the original location of the boulevard since 1890 and the retention of the original name of the boulevard across the City. These aspects would remain and the impacts would not be considered significant since the California Register requires that a resource possess integrity, which is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance” (California Office of Historic Preservation 1999). To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Which of these factors is most important depends on the particular criterion under which the resource is considered eligible for listing (California Office of Historic Preservation 1999). Alessandro Boulevard integrity is retained in the original location; however, design, setting, materials feeling have changed over time through modifications to the road throughout the City, and thus the impacts of the WLCSP would not be significant in the context of the overall conditions of Alessandro Boulevard.

Approximately 1,350 feet of Alessandro Boulevard east of Merwin Street would be closed to through traffic to keep trucks from using Alessandro Boulevard through the residential neighborhoods to the west of the WLC. Eliminating vehicular use of this portion of Alessandro Boulevard would not have a significant impact on the landmark status of the road, as the name and the original routing would be retained. These are the two key characters of the landmark status. This portion of road would be designed to keep access open to non-vehicular users, including pedestrians and bicyclists. Both the original route and name would be retained in keeping with the main aspects of the landmark designation.

In recognition of the historical significance of Alessandro Boulevard and in compliance with Resolution CPAB 88-2, the project will retain and protect the Alessandro Boulevard right-of-way through the project. The conceptual circulation plan for the WLC contained in the Specific Plan (Exhibit 3-1) incorporates nearly all of the current Alessandro alignment. Where the ultimate roadway right-of-way varies from the historic right-of-way, the historic right-of-way will be retained and may be improved with walks, trails, landscaping or similar compatible improvements. Prior to approval of any development including or adjacent to the historic Alessandro Boulevard right-of-way, a concept plan for its entire length shall be submitted to and approved by the Planning Commission. These requirements are contained in the Specific Plan in Section 12.9 “Alessandro Boulevard – Historical Landmark.” Retaining Streets C and E as proposed in the DEIR would have resulted in a potentially significant impact to a historical resource (Alessandro Boulevard), Mitigation Measure 4.5.6.2C has been introduced to keep Alessandro Boulevard in its original alignment. Therefore, any impact is less than significant.

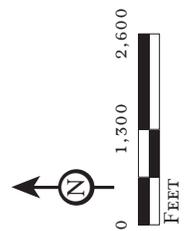
In addition, historical evidence indicates Juan Bautista de Anza traveled through the project area (i.e., along the base of Mt. Russell from south to northwest), which should be acknowledged as part of the trail proposed within the Specific Plan.

Specific Plan Design Features. The Specific Plan was revised to show the realignment of Streets C and E to follow the historical alignment of Alessandro Boulevard and the eastern extension of Cactus Avenue through a part of the on-site Open Space area.



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FIGURE 4.5.1



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The following mitigation measure had been revised in response to Comments A-3-23, A-5-6, et al (see FEIR Volume 1, Table 2.A).

Mitigation Measures. Mitigation Measure 4.5.6.1A requires surveying the seven occupied parcels for archaeological resources since these properties could not be surveyed at the time the EIR was prepared. These surveys will identify the potential for significant historical resources on these properties. In addition, the following measure will further reduce the potential impacts of the project on historical resources:

4.5.6.2A If any historic resources are found during implementation of Mitigation Measure 4.5.6.1A, the Project Archaeologist or Historian (as appropriate) shall offer any artifacts or resources to the Moreno Valley Historical Society (MVHS) or the Eastern Information Center/County Museum or the Western Science Center in Hemet as appropriate for archival storage. From the time any artifacts are turned over to the Moreno Valley Historical Society or other appropriate historical group, the developer shall have no further responsibility for their management or maintenance.

In addition, the following measure is proposed to acknowledge the route of Juan Bautista de Anza through the project area as an important historical event:

4.5.6.2B As part of construction of the trail segment connecting Redlands Boulevard to the California Department of Fish and Wildlife property, the developer shall contribute \$5,000 to the City for the installation of a historical marker acknowledging the passing of Juan Bautista de Anza through this area during his exploration of California. This measure shall be incorporated into trail plans for this segment which will be subject to review and approval by the City Park and Recreation Department in consultation with the Moreno Valley Historical Society.

4.5.6.2C Streets C and E shall follow the historical alignment of Alessandro Boulevard and shall be named Alessandro Boulevard.

Level of Impact After Mitigation. Implementation of the Specific Plan as revised and **Mitigation Measures 4.5.6.1A, 4.5.6.2A, and, 4.5.6.2B 4.5.6.2C** will help reduce potential impacts to historical resources to less than significant levels.

4.5.6.3 Paleontological Resources

Impact 4.5.6.3: *The proposed project has the potential to affect previously undetected subsurface paleontological resources.*

Threshold	Would the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
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As described in the *Paleontological Resources Assessment*, no paleontological resources were observed during the field survey. The majority of the project site is underlain by a thin veneer of Holocene alluvium that caps Pleistocene alluvial sediments. In addition, there is a small outcrop of Cretaceous granite that is exposed on the surface, and likely within the subsurface in some areas as well. The results of the assessment indicate that there are no known paleontological resources located within the project limits or within a one mile radius around the project site. The Holocene Alluvium that is exposed on the surface has a low sensitivity for containing paleontological resources. The Cretaceous granitic rocks that are exposed in a small area of the project have no sensitivity for containing paleontological resources. However, the Pleistocene Alluvium that exists in the subsurface

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of the project has produced paleontological resources in many areas of the Inland Empire and Southern California area.

The portions of the site underlain by older Pleistocene alluvium and San Timoteo Formation rock units should be assigned a “moderate” paleontological sensitivity because these deposits have yielded paleontological resources in other areas in the past. Overall, the project site is considered to have a moderate paleontological sensitivity; therefore, impacts are considered potentially significant and mitigation is required.

Specific Plan Design Features. The Specific Plan does not contain any policies regarding paleontological resources.

Mitigation Measures. The following mitigation measures have been identified to address potential impacts to paleontological resources that may be located within the project limits:

4.5.6.3A Prior to the issuance of any grading permits, a City-approved Paleontologist shall be retained to conduct paleontological monitoring as needed for all grading related to development. Development monitoring shall include the following actions:

1. Monitoring must occur in areas where excavations are expected to exceed twenty (20) feet in depth, in areas where fossil-bearing formations are found during grading, and in all areas found to contain, or are suspected of containing, fossil-bearing formations.
2. To avoid construction delays, paleontological monitors shall be equipped to salvage fossils and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates if they are unearthed.
3. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of specimens.
4. Monitoring may be reduced if the potentially fossiliferous units described herein are not present, or, if present, are determined upon exposure and examination by the Project Paleontologist to have low potential to contain fossil resources. This measure shall be implemented to the satisfaction of the Planning Official. The Project Paleontologist and the Project Archaeologist described in Mitigation Measure 4.5.6.1C may be the same person if he/she meets the qualifications of both positions per Cultural Report MM PR-1, Table 4, pg.76).

4.5.6.3B Prior to the issuance of any permits for the construction of off-site improvements, a qualified paleontologist shall conduct an assessment for paleontological resources on each off-site improvement location. If any site is determined to have a potential for exposing paleontological resources, the project paleontologist shall monitor off-site grading/excavation, subject to coordination with the City. Development monitoring shall include the following mitigation measures:

1. Monitoring must occur in areas where excavations are expected to reach fossil-bearing formations during grading. This monitoring must be conducted by the Project Paleontologist in all areas found to or suspected of containing fossil-bearing formations.
2. To avoid construction delays, the Project Paleontologist shall be equipped to salvage fossils and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates as they are unearthed.
3. The Project Paleontologist shall be empowered to temporarily halt or divert equipment to allow removal of specimens.

4. Monitoring may be reduced if the potentially fossiliferous units described herein are not present, or, if present, are determined upon exposure and examination by the Project Paleontologist to have low potential to contain fossil resources.

Level of Significance After Mitigation. Adherence to **Mitigation Measures 4.5.6.3A** and **4.5.6.3B** will reduce potential impacts to paleontological resources to less than significant levels.

4.5.7 Cumulative Impacts

The cumulative area for cultural resources is the City of Moreno Valley and the western portion of Riverside County. Implementation of the proposed project and related off-site improvements would require measures to identify, recover, and/or record any cultural and/or paleontological resource that may occur within the project limits. Although unlikely to occur, potential impacts associated with human remains would be reduced to a less than significant level through adherence to existing State law. With implementation of the recommended mitigation measures, potential impacts to archaeological or paleontological resources from future development will be reduced to less than significant levels. Since this region contains archaeological, historical, and paleontological resources that have been found in the past, future development in the surrounding region may impact these resources as well. However, implementation of the mitigation measures outlined in this document, and other CEQA documents for development projects in the area, will help reduce potential impacts to cultural resources to less than significant levels. With implementation of the project-level mitigation for future development identified in Section 4.5.6, the proposed project will not have significant impacts related to cultural resources, and will also not make any significant contributions to cumulatively considerable impacts relative to cultural resources. Therefore, no additional mitigation is required.

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NOTE TO READERS. *This section has been revised in response to public comments received on the Programmatic DEIR which have resulted in project changes, updates to technical studies and revisions to EIR sections and proposed Mitigation Measures.*

4.6 GEOLOGY AND SOILS

This section describes the location of the proposed project relative to the known geologic features and soil conditions and qualitatively evaluates potential impacts. Additionally, this chapter evaluates whether development on the proposed project site would significantly be affected by fault rupture, seismic shaking, erosion or unstable slopes, liquefaction, settlement, expansive soils, or other soil or geologic conditions.

NOTE: The following changes have been made due to revision of the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The following documents were prepared to analyze the geologic impacts of the proposed WLC project:

- *Preliminary Geotechnical Evaluation for Environmental Impact Report the World Logistics Center Specific Plan South of Highway 60 Between Redlands Boulevard and Gilman Springs Road City of Moreno Valley, California.* Leighton and Associates, Inc. original dated January 23, 2013 updated September 2014. (Appendix G).
- *Response to NOP Comments for the World Logistics Center Specific Plan.* Leighton and Associates, Inc. May 2012 (Appendix G).

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- *“Preliminary Geotechnical Report, Tentative Parcel Map 35629, Moreno Valley, California, Project No. 111061-108,” by Leighton and Associates, Inc. June 15, 2007.*
- *“Update Preliminary Geotechnical Report, Tentative Parcel Map 35629, Highland Fairview Corporate Park, City of Moreno Valley, California, Project No. 111061-108,” by Leighton and Associates, Inc. April 30, 2008.*
- *“Update Geotechnical Report, Moreno Highlands Specific Plan Area, Southeast Corner of Highway 60 and Redlands Boulevard, City of Moreno Valley, California, Project No. 111061-108,” by Leighton and Associates, Inc. July 21, 2008.*
- *“Preliminary Geotechnical Evaluation for Environmental Impact Report, “The Highlands Specific Plan,” South of Highway 60 between Redlands Boulevard and Gilman Springs Road, City of Moreno Valley, California, Project No. 111061-127”, by Leighton and Associates, Inc. December 13, 2011.*

In addition, the analysis contained in this section is based on the following reference documents:

- Moreno Valley General Plan, Safety Element, July 11, 2006;
- U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Survey Geographic (SSURGO) database for Western Riverside Area, California, September 15, 2003; and
- Geotechnical reports, comments, and responses to comments on geotechnical issues from the Westridge, Skechers, and ProLogis Environmental Impact Reports (various dates).

4.6.1 Existing Setting

The City lies within the Perris Block, a structural unit that is located within the Peninsular Range Geomorphic Province, one of the major geologic provinces of southern California. The Perris Block is a large mass of granitic rock generally bounded by the San Jacinto Fault, the Elsinore Fault, the Santa Ana River, and a non-defined southeast boundary. The Perris Block has had a history of vertical land movements of several thousand feet due to shifts in the Elsinore and San Jacinto Faults. The materials within the valley area are characterized by Pliocene-Pleistocene-aged alluvium ranging from relatively thin (20 feet to 200 feet) to intermediate thickness (up to 2,000 feet), which overlies the older granitic bedrock. The rocky, mountainous areas, including the Box Springs Mountains and the Mount Russell/Lake Perris State Recreation area, have underlying granitic bedrock that consists of quartz diorite, and displays granite rock outcrops and large boulders. The Badlands range, at the eastern end of the area, comprises deposits of what was once an inland sea later elevated and deformed by geologic processes, before becoming severely eroded to its present state. This area consists of folded semi-consolidated sedimentary sandstone, siltstone, and shale. The proposed project is located within the northern portion of the San Jacinto Valley, a fault-bounded tectonic basin that has evolved from movement along the San Jacinto fault system resulting in a down-dropped northwest-trending trough.

The existing setting for geology and soils includes faulting and seismicity, soils, and geologic and seismic hazards, which are discussed below.

4.6.1.1 Faulting and Seismicity

Pursuant to Public Resources Code Section 2690 *et seq.* Leighton & Associates prepared a geotechnical report that analyzes the seismic hazards underlying the project site. Much of the information set forth below and throughout this document is taken from that report. The proposed project site, like the rest of Southern California, is located within a seismically active region as a result

of being located near the active margin between the North American and Pacific tectonic plates. The principal source of seismic activity is movement along the northwest-trending regional fault systems such as the San Andreas, San Jacinto, and Elsinore Fault Zones. Currently, these fault systems accommodate up to approximately 55 millimeters per year (mm/yr) of slip between the plates. The on-site San Jacinto Fault Zone is estimated to accommodate slip of approximately 12 mm/yr. However, geodetic measurements between 1973 and 1981 show that the San Jacinto and San Andreas Faults currently have comparable strain rates. It has been estimated that an average slip rate of as much as 20 mm/yr occurs for the San Jacinto Fault. The San Jacinto Fault zone presents a substantial seismic hazard in Southern California.

By definition of the California Geological Survey, an active fault is a fault, which has had surface displacement within Holocene time (about the last 11,000 years). This definition is used in delineating Earthquake Fault Zones as mandated by the Alquist-Priolo Geologic Hazards Zones Act of 1972 and as most recently revised in 2007 as the Alquist-Priolo Earthquake Fault Zoning Act and Earthquake Fault Zones. The intent of this act is to require fault investigations on sites located within Earthquake Fault Zones to ensure that certain inhabited structures are not constructed across the traces of active faults. The nearest Alquist-Priolo zoned “active faults” is the on-site Claremont Segment of the San Jacinto Fault Zone (see Figure 4.6.1). The western portion of the site is crossed by the City of Moreno Valley Seismic Zone and the postulated trace of the Casa Loma Fault. The nearest off-site fault zones include Casa Loma Segment of the San Jacinto Fault Zone, located 1.6 miles to the south, the San Andreas Fault Zone, located 12.7 miles northeast, and the Glen Ivy Segment of the Elsinore Fault is located approximately 22.7 miles to the southwest of the site.

4.6.1.2 Soils

Based on the *Soil Survey of Western Riverside County*, the project area contains 20 different soil-mapping units belonging to 10 different soil series. (See Table 4.6.A below and Figure 4.2.1 in Section 4.2.) A soil series is a group of soils with similar profiles. These profiles include major horizons with similar thickness, arrangement, and other distinct characteristics. The project site is dominated by San Emigdio loam (SgA and SgC) and San Emigdio fine sandy loam (SeC2), with smaller inclusions of Arbuckle loam (AkC), Badland (BaG), Gorgonio loamy sand (GhC), Greenfield sandy loam (GyA, GyD2), Hanford coarse sandy loam (HcC and HcD2), Metz loamy sand (MdC and MeD), Metz loamy fine sand (MfA), Metz gravelly sandy loam (MID), Ramona sandy loam (RdD2), Rockland (RtF), San Emigdio fine sandy loam (SeA and SeD2), and San Timoteo loam (SmE2).¹

4.6.1.3 Geologic and Seismic Hazards

Geologic and seismic hazards discussed in this subsection include the following:

- Surface rupture;
- Ground shaking;
- Liquefaction;
- Subsidence and seismic settlement;
- Landslides/slope stability; and
- Compressible, expansive and collapsible soils.

¹ Habitat Assessment, MSHCP Consistency Analysis, and HANS Review Highland Fairview Specific Plan City of Moreno Valley, Riverside County, California, November 10, 2011.

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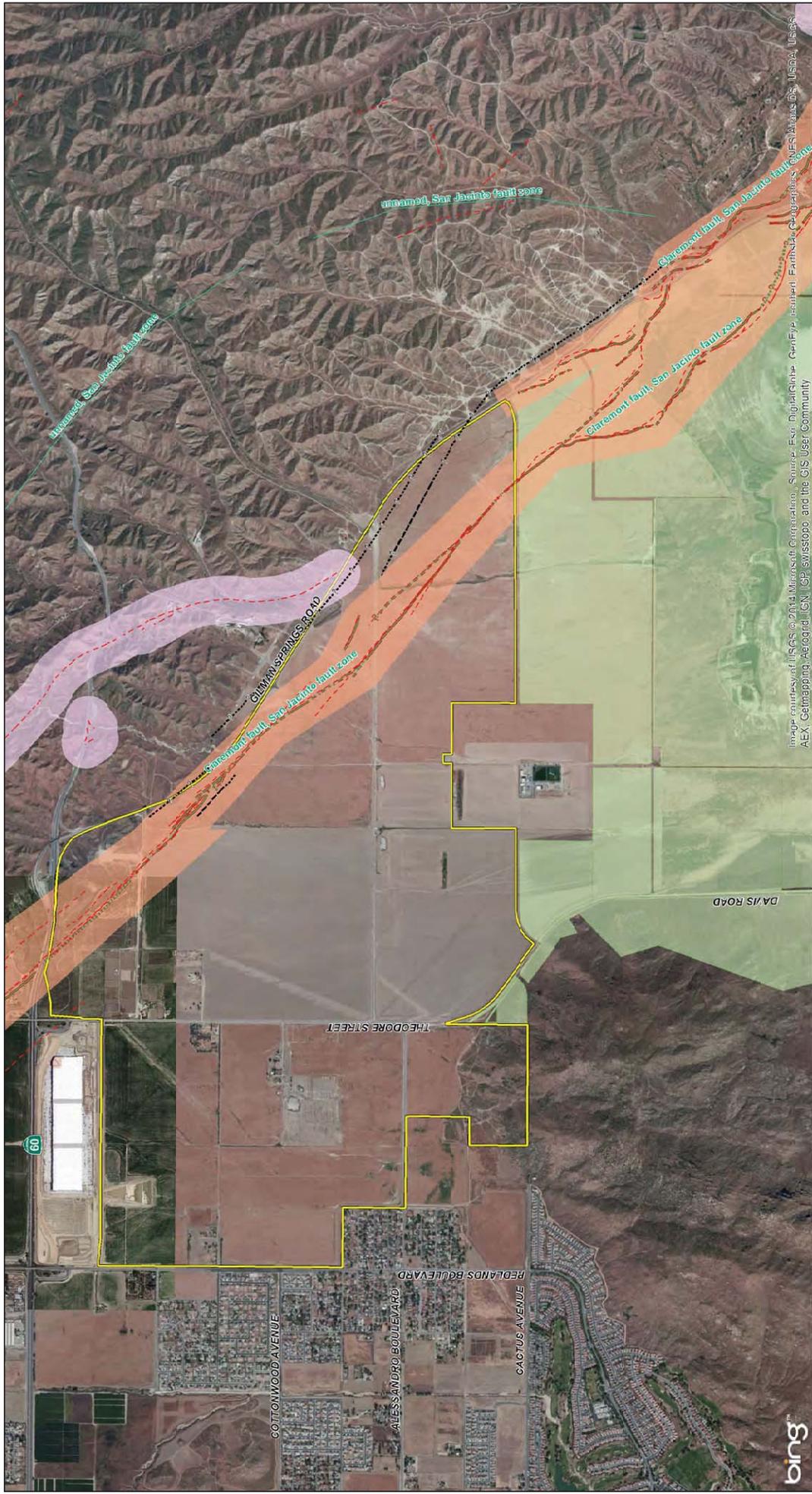


FIGURE 4.6-1

- Project Boundary
- CDFW Land
- Alquist-Priolo Fault Zone
- Riverside County Fault
- Fault, Concealed
- Fault, Inferred
- Fault, Approximate
- Fault, Certain
- Approximate Location of Dibblee Mapped Fault Trace
- Approximate
- Concealed

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Image courtesy of USGS © 2014, Mirasoft Corporation. Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, SPT, Swisstopo, and the GIS User Community

SOURCE: County of Riverside, 2011; ESRI World Imagery & Bing Imagery, 2010; California Geological Survey, 2002 & 2005; Riverside County, 2011; Thomas Dibblee, 2003; California Dept of Fish & Wildlife, 2011. E:\HFV\120\Reports\EIR\fig-4-6-1_Faults.mxd (1/30/2014)

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Table 4.6.A: Major On-site Soil Types

Soil Name	Map Symbol	Shrink-Swell Potential	Runoff Potential	Permeability	Erosion Hazard
San Emigdio loam	SgA, SgC	Low	Slow (SgA) Moderate (SgC)	Moderate	Slight (SgA) Moderate (SgC)
San Emigdio fine sandy loam	SeC2	Low	Medium	Moderately rapid	Moderate
San Emigdio fine sandy loam	SeA, SeD2	Low	Very slow (SeA) Medium (SeD2)	Moderate	Slight(SeA) Moderate (SeD2)
Arbuckle loam	AkC	Moderate	Medium	Moderately slow	Moderate
Badland	BaG	NI	NI	NI	NI
Gorgonio loamy sand	GhC	Low	Slow	Rapid	Slight
Greenfield sandy loam	GyA, GyD2	Low	Slow (GyA) Medium (GyD2)	Moderate	Slight (GyA) Moderate (GyD2)
Hanford coarse sandy loam	HcC, HcD2	Low	Slow to Medium (HcC) Medium (HcD2)	Moderate	Slight to Moderate (HcC) Moderate (HcD2)
Metz loamy sand	MdC, MeD	Low	Slow	Rapid	Slight (MdC) High (MeD)
Metz loamy fine sand	MfA	Low	Slow	Rapid	Slight
Metz gravelly sandy loam	MID	Low	Slow to Medium	Moderately rapid	Slight to Moderate
Ramona sandy loam	RdD2	Low	Medium	Moderately slow	Moderate
Rockland	RtF	-	Slow	Slow	Moderate to High
San Timoteo loam	SmE2	Low	Rapid	Moderate	High

NI = no information

Source: Soil Survey of Western Riverside County, U.S. Soil Conservation Service

Surface Rupture. Surface rupture occurs where displacement or fissuring occurs along a fault zone. While primary ground damage due to earthquake fault rupture typically results in a relatively small percentage of the total damage in an earthquake, the location of structures or facilities too close to a rupturing fault can cause profound damage. It is difficult to reduce the hazards of surface rupture through structural design. The primary method to avoid this hazard is to either set structures and facilities away from active faults, or avoid their construction in close proximity to an active fault.

Faults throughout southern California have formed over millions of years. Some of these faults are considered inactive under present geologic conditions, and other faults are known to be active.¹ Such faults have either generated earthquakes in historic times (200 years), or show geologic and geomorphic indications of movement within the last 11,000 years. Faults that have moved in the relatively recent geological past are generally presumed to be the most likely candidates to generate damaging earthquakes in the lifetimes of residents, buildings, or communities. As previously identified, the Claremont Segment of the San Jacinto Fault Zone is located on the eastern portion of the site; therefore, ground surface rupture is an identified seismic hazard within the project limits.

¹ The Alquist-Priolo Earthquake Fault Zoning Act defines *active faults* as those that show proven displacement of the ground surface within about the last 11,000 years. *Potentially active faults* are those that show evidence of movement within the last 1.6 million years.

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Ground Shaking. The vast majority of earthquake damage is caused by ground shaking. Source effects include earthquake size, location, and distance. The bigger and closer the earthquake is, the more severe the damage will be. The exact way that rocks and other earth materials move along the fault can also influence shaking, as can the subsurface orientation of the fault.

Path effects are caused by seismic waves that change direction as they travel through the earth's contrasting layers, just as light bounces (reflects) and bends (refracts) as it moves from air to water. Sometimes this can focus seismic energy at one location, and cause damage in unexpected areas.

Site effects are brought about by seismic waves that slow down in the loose sediments and weathered rock at the surface of the earth. As they slow, their energy converts from speed to amplitude, which increases shaking. This is identical to the behavior of ocean waves. As the waves slow down near shore, their crests grow higher. Sometimes, too, seismic waves get trapped at the surface and resonate. Whether resonance will occur depends on the period (the length) of the incoming waves. Waves, soils and buildings all have resonant periods. When these match, tremendous damage can occur.

The primary threat associated with on-site and the nearby faults previously identified is the intensity of ground shaking that could be generated at the project site.

Liquefaction. Liquefaction occurs primarily in saturated, loose, fine-to-medium-grained soils in areas where the groundwater table is within 50 feet of the surface. Shaking suddenly causes soils to lose strength and behave as a liquid. Excess water pressure is vented upward through fissures and soil cracks, and a water-soil slurry bubbles onto the ground surface. The resulting features are called "sand boils," "sand blows," or "sand volcanoes." Liquefaction-related effects include loss of bearing strength, ground oscillations, lateral spreading, and flow failures or slumping. Based on Figure 6-3 of the Safety Element of the City's General Plan, the project site is not located in an area identified as having a liquefaction potential. Site-specific geotechnical studies by Leighton have concluded the project site has a very low potential for liquefaction.

Subsidence and Seismic Settlement. Ground subsidence is typically a gradual settling or sinking of the ground surface with little or no horizontal movement, although fissures (cracks and separations) can result from lowering of the ground surface.

The common causes of subsidence that can produce small or local collapses to broad regional subsidence include:

- Dewatering of peat or organic soils;
- Dissolution in limestone aquifers;
- First-time wetting of moisture-deficient, low-density soils (hydrocompaction);
- Natural compaction;
- Liquefaction;
- Crustal deformation;
- Ground shaking;
- Subterranean mining; and
- Withdrawal of fluids (groundwater, petroleum, or geothermal).

Most of the damage caused by subsidence is the result of oil, gas, or groundwater extraction from below the ground surface, or the organic decomposition of peat deposits. Ground subsidence may occur as a response to natural forces such as earthquake movements, which can cause abrupt elevation changes of several feet or densification of low density granular soils during an earthquake event that may cause several inches of settlement.

Landslides/Slope Stability. Significant factors that contribute to slope failure include slope height and steepness, shear strength and orientation of weak layers in the underlying geologic units, and pore water pressures. There are no known landslides within the project area; however, a large older landslide has been mapped primarily off site on the northeasterly flanks of Mount Russell, near the southwest portion of the property. The landslide appears to have originated on the higher slopes (off site) and moved northeast, partially onto the subject property.

Alluvial Soil. Alluvial soil was encountered in all exploratory borings, fault trenches, and test pits excavated at the site.¹ The alluvial soils were deposited as part of a complex depositional environment and generally include interbedded fine sands and silts with varying amounts of clay. The yellow-brown to medium gray recent alluvial soils (younger alluvium) are found in drainages and believed to constitute the upper surficial materials (upper 3 to 10 feet). The deeper materials (older alluvium and older fan-deposits) are generally dark yellow-brown to dark gray and consist of silty fine sand to sandy silt with interbedded lenses of silt clay and sandy gravel. The alluvium along the southeastern side of the site is significantly denser and contains considerable amounts of coarser sands and gravel. Pertinent engineering characteristics of the encountered alluvium are summarized below:

- **Compressibility Characteristics.** The alluvium is generally loose in the upper 10 to 15 feet in most areas. At depths greater than 15 feet, the alluvium is generally medium dense. The results of testing by Leighton also indicate a high rebound potential during unloading for some of the tested alluvium. This rebound affect may cause some elevation rise in areas of significant excavation.
- **Expansive Soils.** Expansive soils generally have a significant amount of clay particles that can give up water (shrink) or take on water (swell). The change in volume exerts stress on buildings and other loads placed on these soils. The extent of shrink/swell is influenced by the amount and kind of clay in the soil. The occurrence of these soils is often associated with geologic units having marginal stability. The majority of the site materials are expected to have a low expansive potential; however, expansive soils are known to exist on site. The more expansive soils are expected to be localized and associated with interbedded silt and clay layers.
- **Collapse Potential.** Hydroconsolidation, or soil collapse, typically occurs in recently deposited Holocene (less than 10,000 years before present time) soils that were deposited in an arid or semi-arid environment. Soils prone to collapse are commonly associated with man-made fill, wind-laid sands and silts, and alluvial fan and mudflow sediments deposited during flash floods. Particles of these soils, which typically contain minute pores and voids, may be partially supported by clay or silt, or chemically cemented with carbonates. When saturated, collapsible soils undergo a rearrangement of their grains and the water removes the cohesive (or cementing) material, and a rapid, substantial settlement may occur. An increase in surface water infiltration (such as from irrigation) or a rise in the groundwater table, combined with the weight of a building or structure, may initiate settlement, causing foundations and walls to crack. Soil borings and laboratory testing conducted by Leighton determined that on-site soils have low to moderate

¹ *Preliminary Geotechnical Evaluation for Environmental Impact Report World Logistics Center Specific Plan South of Highway 60 Between Redlands Boulevard and Gilman Springs Road City of Moreno Valley, California.* Leighton and Associates, Inc. January 2013.

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potential for collapse with the exemption of dispersed areas just south of the extension of Eucalyptus Avenue.¹

4.6.1.4 Off-site Improvements

After the approximate locations of the various project-related off-site improvements were identified (e.g., reservoirs, and the Theodore Street/SR-60 interchange), the project geologist (Leighton) conducted a brief geotechnical assessment of the various off-site areas to identify the potential for geotechnical constraints (see Appendix G). Leighton concluded that none of the off-site improvement areas had substantial seismic or seismically related constraints, but did recommend additional testing and evaluation for localized soil constraints once specific improvement footprints had been established.

4.6.1.5 NOP/Scoping Comments

Several members of the public said the EIR should examine potential seismic and other impacts related to the San Jacinto Fault Zone, as well as the Casa Loma and Farm Road Faults. These comments were addressed by the project geologist and geotechnical consultant (Leighton) and are addressed in Sections 4.6.5 and 4.6.6 in relation to project impacts.

4.6.2 Policies and Regulations

4.6.2.1 State Regulations

Alquist-Priolo Earthquake Fault Zoning Act. The major State legislation regarding earthquake fault zones is the *Alquist-Priolo Earthquake Fault Zoning Act* (A-P Act). In 1972, the State of California began delineating “Earthquake Fault Zones” (called Special Studies Zones prior to 1994) around and along faults that are “sufficiently active” and “well defined” to reduce fault-rupture risks to structures for human occupancy (California Public Resources Code Sections 2621–2630). The boundary of an “Earthquake Fault Zone” is generally 500 feet from major active faults and from 200 to 300 feet from well-defined minor faults. The mapping of active faults has been completed by the State Geologist, and these maps are distributed to all affected cities, counties, and State agencies for their use in developing planning policies and controlling renovation or new construction.

Before a project can be permitted within an identified Earthquake Fault Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. A site-specific evaluation and written report must be prepared by a licensed geologist. If an active fault is identified, a structure intended for human occupancy cannot be placed over the trace of the fault and must be set back from the fault.

The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards.

The Seismic Hazards Mapping Act. Passed in 1990, the Seismic Hazards Mapping Act (SHMA) addresses non-surface fault rupture earthquake hazards, including strong ground shaking, liquefaction, and seismically induced landslides. The California Geological Survey (CGS) is the principal State agency charged with implementing the 1990 SHMA. Pursuant to the SHMA, the CGS is directed to provide local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The goal is to minimize loss of life and property by identifying and mitigating seismic hazards.

¹ Ibid.

The seismic hazard zones delineated by the CGS are referred to as “zones of required investigation.” Site-specific geotechnical hazard investigations are required by SHMA when construction projects fall within these areas.

Natural Hazards Disclosure Act. Effective June 1, 1998, the Natural Hazards Disclosure Act requires that sellers of real property and their agents provide prospective buyers with a “Natural Hazard Disclosure Statement” when the property being sold lies within one or more State-mapped hazard areas. If a property is located in a Seismic Hazard Zone as shown on a map issued by the State Geologist, the seller or the seller’s agent must disclose this fact to potential buyers.

4.6.2.2 Local Policies

City of Moreno Valley General Plan Policies. The City of Moreno Valley General Plan includes policies and goals related to geologic and seismic hazards. The following goals and policies are applicable to the proposed WLC project.

Safety Element

Goal 6.1 To achieve acceptable levels of protection from natural and man-made hazards to life, health and property.

Goal 6.2 To have emergency services which are adequate to meet minor emergency and major catastrophic situations.

Safety Element Objectives and Policies

Objective 6.1

Minimize the potential for loss of life and protect residents, workers, and visitors to the City from physical injury and property damage due to seismic ground shaking and secondary effects.

Policies:

6.1.1 Reduce the effects from fault rupture and liquefaction hazards through the identification and recognition of potentially hazardous conditions and areas as they relate to the San Jacinto fault zone and the high and very high liquefaction hazard zones. During the review of future development projects, the City shall require geologic studies and mitigation for fault rupture hazards in accordance with the Alquist-Priolo Special Study Zones Act. Additionally, future geotechnical studies shall contain calculations for seismic settlement on all alluvial sites identified as having high or very high liquefaction potential. Should the calculations show a potential for liquefaction, appropriate mitigation shall be identified and implemented.

6.1.2 Require all new developments, existing critical and essential facilities and structures to comply with the most recent Uniform Building Code seismic design standards.

4.6.3 Methodology

The analysis of potential geologic and soil-related impacts is based upon the preliminary site specific geotechnical study prepared by Leighton and Associates, the City’s Safety Element of the General Plan, literature prepared by the California Department of Mines and Geology (CDMG), information from the federal Natural Resources Conservation Service (NRCS), mapping published by the United States Geological Survey (USGS), and other documents such as the City’s Building Code, and the City’s Standard Design Guidelines, which were reviewed and summarized to establish existing conditions. In determining the level of significance, the analysis assumes that construction and

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operation of the proposed project would comply with relevant Federal and State laws and regulations, as well as City General Plan policies.

4.6.4 Thresholds of Significance

The following thresholds of significance regarding potential impacts to geology and soils are based on *CEQA Guidelines* (2011). A project would have a significant impact related to geology and soils if it would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Maps issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.
- Result in substantial soil erosion or the loss of topsoil;
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994 or most current edition), creating substantial risks to life or property; and/or
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

4.6.5 Less than Significant Impacts

The following impacts were determined to be less than significant. In each of the following issues, either no impact would occur (therefore, no mitigation would be required) or adherence to established regulations, standards and policies would reduce potential impacts to a less than significant level.

4.6.5.1 Landslides and Rockfalls

Threshold	Would the proposed project expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?
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NOTE: The following changes have been made due to revision to the Specific Plan project size.

A large older landslide has been mapped primarily off site on the north easterly flanks of Mount Russell, near the southwest portion of the property. The landslide appears to have originated on the higher slopes off site, and moved northeast, partially onto the subject property. The Specific Plan designates 74.3 acres in the southwestern portion of the property as open space. This 74.3 acres includes the steepest slopes on site (i.e., the Mount Russell foothills), which will reduce the potential for significant landslide or rockfall impacts on the project to less than significant levels; therefore, no mitigation is needed.

4.6.5.2 Soil Erosion or Loss of Topsoil

Threshold	Would the proposed project result in substantial soil erosion or the loss of topsoil?
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The proposed project includes the grading of approximately 2,684 acres for the construction of the proposed logistics buildings. In addition, the project proposes the construction of various infrastructure improvements both on site and off site. These improvements include the construction of on-site and off-site water, sewer, freeway interchange and roadway/intersection improvements, debris basins, reservoirs, water and sewer lines, utility substations, etc. These activities have the potential to cause erosion both on site and off site.

Development of the site would require the movement of on-site soils. Portions of the site have been and are being used for dry farming, and several rural residences are present. Prior to the issuance of grading permits, the project proponent will be required to prepare and submit detailed grading plans as each phase is developed. These plans will be prepared in conformance with applicable standards of the City's Grading Ordinance. Construction of off-site utility and roadway improvements will also result in the movement of soil. Plans are not available at this time for off-site improvements but that construction will be subject to the same permitting and plan checking processes.

Development of the site and related off-site improvements would involve the disturbance of more than one acre; therefore, the project is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit. A Storm Water Pollution Prevention Plan (SWPPP) will also be required to address erosion and discharge impacts associated with the proposed on-site grading. Compliance with storm water regulations include minimizing storm water contact with potential pollutants by providing covers and secondary containment for construction materials, designating areas away from storm drain systems for storing equipment and materials and implementing good housekeeping practices at the construction site. The following SWPPP components will reduce potential impacts of soil erosion or loss of topsoil to less than significant levels:

- Protect all storm drain inlets and streams located near the construction site to prevent sediment-laden water from entering the storm drain system.
- Prevent erosion by implementing one or more of the following soil stabilization practices: mulching, surface roughening, permanent or temporary seeding.
- Limit vehicular access to and from the site. Stabilize construction entrances/exits to minimize the track out of dirt and mud onto adjacent streets. Conduct frequent street sweeping.
- Protect stockpiles and construction materials from winds and rain by storing them under a roof, secured impermeable tarp or plastic sheeting.
- Avoid storing or stockpiling materials near storm drain inlets, gullies or streams.
- Phase grading operations to limit disturbed areas and duration of exposure.
- Perform major maintenance and repairs of vehicles and equipment off site.
- Wash out concrete mixers only in designated washout areas at the construction site.
- Set-up and operate small concrete mixers on tarps or heavy plastic drop cloths.
- Keep construction sites clean by removing trash, debris, wastes, etc. on a regular basis.
- Clean up spills immediately using dry clean-up methods (e.g., absorbent materials such as cat litter, sand or rags for liquid spills; sweeping for dry spills such as cement, mortar or fertilizer) and by removing the contaminated soil from spills on dirt areas.
- Maintain all vehicles and equipment in good working condition. Inspect frequently for leaks, and repair promptly.

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- Cover open dumpsters with secured tarps or plastic sheeting. Clean out dumpsters only in approved locations on the construction site.
- Arrange for an adequate debris disposal schedule to insure that dumpsters do not overflow.

A preliminary WQMP was prepared for the WLCSP and is included in Appendix J-2. The preliminary WQMP contains the following post-construction measures, which will help reduce potential impacts to soil erosion to less than significant levels and identifies measures to treat and/or limit the entry of contaminants into the storm drain system:

- *Maximize the permeable area.* A significant portion of the project will remain pervious for the purposes of landscaping, water quality treatment, and flood detention. By incorporating more pervious, lower Runoff Coefficient (C factor) surfaces into the project, lower volumes of runoff will be produced.
- *Incorporate landscaped buffer areas between sidewalks and streets.* Bioretention areas between sidewalks and streets will be incorporated and serve the dual purpose of landscaping and water quality treatment.
- *Maximize canopy interception and water conservation by preserving existing native trees and shrubs, and planting additional native or drought-tolerant trees and large shrubs.* Although most of the project area will require mass grading, some existing native trees and shrubs will be preserved where feasible.
- *Use natural drainage systems.* The majority of the project site currently sheet flows to small earthen ditches. Under the proposed condition, most of these natural ditches will be removed, with the exception of one natural drainage course. This natural drainage path, located at the eastern portion of the project, will be maintained under the proposed condition.
- *Where soils conditions are suitable, use perforated pipe or gravel filtration pits for low flow infiltration.* Infiltration basins will be proposed where soil conditions are appropriate.
- *Construct on-site ponding areas or retention facilities to increase opportunities for infiltration consistent with vector control objectives.* Detention basins and/or infiltration basins will be provided on site. The locations of these facilities will be shown in the project-specific WQMP.
- *Construct streets, sidewalks and parking lot aisles to the minimum widths necessary, provided that public safety and a walkable environment for pedestrians are not compromised.* Street, sidewalk, and parking design will incorporate minimum street widths that still meet City requirements and emergency access requirements.
- *Reduce widths of street where off-street parking is available.* Street design will incorporate minimum street widths that still meet City requirements and emergency access requirements.
- *Minimize the use of impervious surfaces, such as decorative concrete, in the landscape design.* The use of impervious surfaces for decorative purposes will be minimized where possible.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

- *Conserve natural areas.* There are 1,205 acres of natural areas that will be designated as undisturbed open space. The proposed project designates 1,086 acres of CDFW land, and an additional 44 acres of natural areas maintained by utility companies, and 74.3 acres within the WLC Specific Plan, for Open Space use.
- *Development sites will be designed to contain and infiltrate roof runoff, or direct roof runoff to vegetative swales or buffer areas, where feasible.* Runoff from impervious areas will sheet flow or be directed to Treatment Control BMPs.

- *Where landscaping is proposed, impervious sidewalks, walkways, and trails will be designed to drain into adjacent landscaping.* Streets, sidewalks, and parking lots will sheet flow to landscaping/bioretenion areas.
- *Increase the use of vegetated drainage swales in lieu of underground piping or imperviously lined swales.* Runoff from impervious areas will sheet flow to vegetated swales, bioretention areas, infiltration basins, and/or detention basins.
- *Rural swale system: street sheet flows to vegetated swale or gravel shoulder, curbs at street corners, culverts under driveways and street crossings.* Streets will sheet flow to adjacent landscaping/bioretenion areas.
- *Urban curb/swale system; street slopes to curb, periodic swale inlets drain to vegetated swale/biofilter.* Streets will sheet flow to adjacent landscaping/bioretenion areas.
- *Design driveways to drain into landscaping prior to discharging to the MS4.* Driveways will sheet flow to adjacent landscaping/bioretenion areas.
- *Uncovered parking may be paved with a permeable surface, or designed to drain into landscaping prior to discharging to the MS4.* Parking lots will sheet flow to adjacent landscaping/bioretenion areas.

The WQMP is incorporated by reference and/or attached to the project’s SWPPP as the Post-Construction Management Plan.

As soils covering the project site have a slight-to-high erosion hazard potential and because the project would be required to adhere to the City’s Grading Ordinance, obtain an NPDES Permit, and prepare an SWPPP and a WQMP, construction and operational impacts associated with soil erosion hazards are considered to be less than significant, and no mitigation is required.

Grading for off-site improvements would require subsequent grading permits or related approvals from both the City and County of Riverside, depending on the improvement and its location. Most roadway and intersection improvements will occur within existing rights-of-way or on land that has been previously disturbed. The SWPPP and the WQMP establish performance standards for future development, and implementation the identified measures in those plans will reduce potential erosion impacts to less than significant levels (See also Section 4.9, *Hydrology and Water Quality*, for a discussion of potential issues associated with soil erosion during construction and project operations).

4.6.5.3 Septic Tanks

Threshold	Would the proposed project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
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All buildings within the project will be connected to existing wastewater facilities (sewer) owned and operated by the Eastern Municipal Water District. Septic tanks will not be used anywhere within the project. No mitigation is required.

4.6.5.4 Seismic-Related Ground Failure

Threshold	Would the proposed project expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic ground failure?
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NOTE: The following changes have been made due to revision to the Specific Plan project size.

Development of the proposed project will result in the construction of up to 40.6 million square feet of logistics warehouse uses. The project site is located within Seismic Zone 4 as defined by the Uniform Building Code (UBC). Exhibit S4 of the Safety Element of the City's General Plan indicates that the project site is not located in an area susceptible to landslides or slope instability.

The project site lies on relatively flat terrain ($\pm 2\%$ grade) and no landslide areas or mass movement were observed on site. The only steep topographical features are located in the southwest corner of the project area (see Section 4.6.6.3 below). This area is designated for Open Space uses and is not proposed for development.

The project does not propose any activity known to cause damage by subsidence (e.g., oil, gas, or groundwater extraction). Settlement generally occurs within areas of loose, granular soils with relatively low density. The project site is underlain by relatively dense alluvial and dense sedimentary bedrock materials at depth and the potential for settlement is considered low. Because the project site does not exhibit characteristics of a high potential for subsidence or settlement, impacts are considered less than significant. No mitigation is required.

The potential for liquefaction generally occurs during strong ground shaking within relatively cohesionless loose sediments where the groundwater is typically less than 50 feet below the surface. Because the project site does not exhibit characteristics of a high potential for liquefaction induced settlement (i.e., relatively dense soils with groundwater levels in excess of 100 feet), impacts are considered less than significant. No mitigation is required.

4.6.6 Significant Impacts

The following impacts were determined to be potentially significant. In each of the following issues, mitigation measures have been recommended to reduce the significance of the identified impacts.

4.6.6.1 Fault Rupture

Impact 4.6.6.1: *Future development permitted by the project would locate development in an area susceptible to fault rupture.*

Threshold	Would the proposed project expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Maps issued by the State Geologist for the area or based on other substantial evidence of a known fault.
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Surface rupture occurs where displacement or fissuring occurs along a fault zone. While primary ground damage due to earthquake fault rupture typically results in a relatively small percentage of the total damage in an earthquake, the location of structures or facilities too close to a rupturing fault can cause profound damage. The primary method to avoid this hazard is to either set structures and facilities away from active faults, or avoid their construction in close proximity to an active fault.

Faults throughout southern California have formed over millions of years. Some of these faults are generally considered inactive under present geologic conditions and other faults are known to be

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active.¹ Such faults have either generated earthquakes in historic times (within the last 200 years) or show geologic and geomorphic indications of movement during the last 11,000 years. Faults that have moved in the relatively recent geological past are generally presumed to be the most likely candidates to generate damaging earthquakes in the lifetimes of residents, buildings, or communities.

The Seismic Hazards Mapping Act establishes a statewide public safety standard for mitigation of earthquake hazards. According to the Act the minimum level of mitigation for a project "should reduce the risk of ground failure during an earthquake to a level that does not cause the collapse of a building intended for human occupancy," though generally not to a level of no ground failure to all. Moreover, the California Building Code 2010 (CBC) establishes standards for seismic safety in the design and construction of buildings, and includes "significant building design and construction criteria that have been tailored for California earthquake conditions." It "provides standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures within its jurisdiction." Chapter 18 of the UBC specifies the required level of soil investigation. It contains requirements applicable to buildings and foundations, which take into consideration reduction of potential seismic hazards.

The CBC requires geologic and earthquake engineering reports for all proposed construction, prepared by a California-certified engineering geologist in consultation with a California-registered geotechnical engineer, the purpose of which is to identify geologic and seismic conditions that may require project mitigations. (Cal. Code Regs., Title 24, §§ 1802.7.1, 1802.7.2.) The report must contain data which provide an assessment of the nature of the site and potential for earthquake damage based on appropriate investigations of the regional and site geology, project foundation conditions and the potential seismic shaking at the site. (Cal. Code Regs., Title. 24, § 1802.7.2.) The CBC also requires a geotechnical report, which would provide evaluations of the soil conditions of the site and the potential geologic/seismic hazards affecting the site. The report must include site-specific evaluations of design criteria related to the nature and extent of foundation materials, groundwater conditions, liquefaction potential, settlement potential, slope stability, and potential site ground motion. (Cal. Code Regs., Title. 24, § 1802.81.)"

City Ordinance 9.08.160 states "In accordance with provisions of the Alquist-Priolo Special Studies Zone Act (Division 2, Chapter 7.5 of the Public Resource Code) and the Public Health and Safety Element of the City General Plan, a geologic investigation shall be required for any development proposal involving structures for human occupancy within the special study zone for the San Jacinto Fault, as identified on the special studies zone maps prepared by the state of California Department of Conservation, or the Casa Loma Fault, as identified on the seismic zone map in the City General Plan. Geologic investigations shall be prepared by a geologist registered in the state of California and shall be reviewed for acceptance by a geologist registered in the state of California who is either an employee or under contract to the City. Geologic investigations shall consider ground shaking as the greatest potential risk and include a thorough evaluation of potential hazards based upon soils types, slope stability, proximity to fault lines and expected magnitude. Copies of all geologic investigations shall be kept on file in the office of the City building official."

The western portion of the site is crossed by the City of Moreno Valley Seismic Zone, a postulated trace of the Casa Loma Fault and the Farm Road Strand. A detailed fault investigation was performed by Leighton for these projected faults. Although no active faulting was observed, some local discontinuous fracturing was observed and documented. Because of the potential for ground movements in this area, mitigation is required.

¹ The Alquist-Priolo Earthquake Fault Zoning Act defines *active faults* as those that show proven displacement of the ground surface within about the last 11,000 years. *Potentially active faults* are those that show evidence of movement within the last 1.6 million years.

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Specific Plan Design Features. The Specific Plan does not contain any policies that specifically address seismic limitations, but does acknowledge that all future development will require the preparation of site-specific geotechnical reports to ensure compliance with all applicable standards.

Mitigation Measures. State law prohibits the construction and placement of habitable structures¹ over the trace of an active fault pursuant to the Alquist-Priolo Act. The A-P Earthquake Fault Zone is located on the eastern border of the project site (refer to Figure 4.6.1). Trenching conducted by Leighton across the Claremont Segment of the San Jacinto Fault in the eastern area of the project site identified the location of a portion of the fault; however, the entire length of the fault through the project site was not trenched. Although no habitable structure can be located on an active fault per State law, fault rupture hazard represents a potential significant seismic hazard on site that would require mitigation. To ensure fault rupture impacts are appropriately mitigated, the following measures has been identified:

4.6.6.1A Prior to approval of any projects for development between Redlands Boulevard and Theodore Street, south of Dracaea Avenue (projected east from Redlands Boulevard), and the area south of Alessandro from the western boundary along the Mount Russell toe of slope easterly into the site 1,500 feet, the City shall determine if a detailed fault study of the Casa Loma Fault Zone area is required based on available evidence. If necessary, any additional geotechnical investigations shall be prepared by a qualified geologist and determine if structural setbacks are needed, and shall identify specific remedial earthwork and/or foundation recommendations. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Structures intended for human occupancy shall not be located within any structural setback zone as determined by those studies. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.

4.6.6.1B Prior to approval of any projects for development within or adjacent to the San Jacinto Alquist-Priolo Earthquake Fault Zone, the City shall review and approve a geotechnical fault study prepared by a qualified geologist to confirm the alignment and size of any required building setbacks related to the fault zone. If necessary, this study shall identify a “special foundation or grading remediation zone” for the areas supporting structures intended for human occupancy where coseismic deformation (fractures) is observed. This zone shall be determined after subsurface evaluation based on proposed building locations. Specific remedial earthwork and foundation recommendations shall be evaluated as necessary based on proposed building

¹ California Code of Regulations, Section 3601 states, “A structure for human occupancy is any structure used or intended for supporting or sheltering any use of occupancy, which is expected to have a human occupancy rate of more than 2,000 person-hours per year.”

locations. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.

This study may involve trenching to adequately identify the location of the Claremont segment of the San Jacinto Fault Zone that crosses the eastern portion of the World Logistics Center Specific Plan property. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.

4.6.6.1C

Prior to the approval of grading permits, or permits for construction of off-site improvements, the City shall review and approve plans confirming that the project has been designed to withstand anticipated ground shaking and other geotechnical and soil constraints (e.g., settlement). The project proponent shall submit plans to the City as appropriate for review and approval prior to issuance of grading permits or issuance of permits for the construction of any offsite improvements. This measure shall be implemented to the satisfaction of the City Engineer

Level of Impact After Mitigation. Adherence to the measures identified in the geotechnical investigations, as well as other requirements identified and required by the City, will ensure fault rupture hazards are reduced to a less than significant level.

4.6.6.2 Ground Shaking

Impact 4.6.6.2: *Future development permitted by the proposed project would locate development in an area susceptible to strong seismic ground shaking.*

Threshold	Would the proposed project expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong ground shaking?
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Southern California is a seismically active area and, therefore, will continue to be subject to ground shaking resulting from seismic activity on regional faults. Ground shaking from earthquakes associated with nearby and more distant faults is expected to occur during the lifetime of the project. The level of potential ground motion is considered moderate to high in the City of Moreno Valley and, therefore, in the project area.

Project or Specific Plan Design Features. The Specific Plan does not contain any policies that specifically address seismic limitations, but does acknowledge that all future development will require

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the preparation of site-specific geotechnical reports to ensure compliance with all applicable standards.

Mitigation Measures. In accordance with the City’s General Plan Safety Element (Objective 6.1),¹ project development will require geological and geotechnical investigations by State-licensed professionals. The geotechnical investigations will provide design considerations and earthwork recommendations to ensure that ground shaking impacts are appropriately mitigated. In addition, California Code of Regulations (CCR), Title 24, also known as the California Building Standards Code, contains building design and construction requirements relating to fire and life safety, and structural safety. The CBC also includes standards designed to ensure that structures within California are built to withstand expected levels of seismic activity for each earthquake region throughout the State. Specifically, Part 2 of Title 24, including Chapters 4, 16-18, and Appendix J provide guidance regarding grading, soils, and construction techniques related to seismic protection. These codes are provided to protect public safety and ensure that all structures built in the State can withstand anticipated seismic ground shaking and other related geotechnical and soils constraints.

To ensure ground shaking impacts are appropriately mitigated, the following measure is recommended:

4.6.6.2A Prior to issuance of building permits for any portion of the project site, a site-specific, design level geotechnical investigation for each parcel shall be submitted to the City , which would comply with all applicable state and local code requirements, and includes an analysis of the expected ground motions at the site from known active faults using accepted methodologies. The report shall determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults. The report shall also determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. In addition, adherence to **Mitigation Measure 4.6.6.1C** addresses impacts of off-site improvements in this regard.

Level of Significance After Mitigation. Adherence to the measures identified in the geotechnical investigations, as well as other requirements identified and required by the City, will ensure ground shaking hazards are reduced to a less than significant level.

¹ Moreno Valley General Plan, Chapter 9 Goals and Objectives, pg. 9-30.

4.6.6.3 Unstable Soils

Impact 4.6.6.3: *Future development permitted by the proposed project may locate development in an area with expansive soils.*

Threshold	Would the proposed project be located on expansive soil, creating substantial risks to life or property?
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As previously identified, expansive soils generally have a substantial amount of clay particles, which can give up water (shrink) or absorb water (swell). The change in the volume exerts stress on buildings and other loads placed on these soils. The extent or range of the shrink/swell is influenced by the amount and kind of clay present in the soil. Expansive soils can be widely dispersed and they can occur in hillside areas as well as low-lying alluvial basins. On-site soils (Dv and Wb soils) are identified as having a moderate to low shrink-swell potential. Because the potential exists to locate development on moderately expansive soils, impacts are considered significant and mitigation is required.

Project or Specific Plan Design Features. The Specific Plan does not contain any policies that specifically address seismic limitations, but does acknowledge that all future development will require the preparation of site-specific geotechnical reports to ensure compliance with all applicable standards.

Mitigation Measures. In accordance with the City's General Plan Safety Element (Implementation Measure I.E.1) and as indicated previously, development of the project will require geological and geotechnical investigations by State-licensed professionals. To ensure impacts from expansive soils are addressed for specific development sites, adherence to **Mitigation Measures 4.6.6.3A** through **4.6.6.3C** will be required.

4.6.6.3A Each Plot Plan application for development shall include a site-specific, design level geotechnical investigation for each parcel, in compliance with all applicable state and local code requirements, and including an analysis of the expected soil hazards at the site. The report shall determine:

1. Structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults.
2. The final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements.

Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site-specific geotechnical investigations. In addition, the project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet the California Building Code requirements, and incorporate all applicable mitigations from the investigation into the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. These investigations shall identify any site-specific impacts from compressible and expansive soils based on the actual location of individual pads proposed in the future, so that differential movement can be further verified or evaluated in view of the actual foundation plan and imposed fill or structural loads. Additionally, a registered geotechnical engineer shall review each site-specific geotechnical investigation, approve the final report, and require

compliance with all geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure, and all other relevant construction permits. The City Building Division shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the California Building Code (California Code of Regulations, Title 24), and/or professional engineering standards appropriate for the seismic zone in which such construction may occur.

Compliance with this measure will ensure that future buildings are designed to protect the structure and occupants from on-site soil limitations, consistent with State Building Code requirements. This measure shall be implemented to the satisfaction of the City Engineer.

4.6.6.3B Any cut slopes in excess of five (5) feet in vertical height shall be constructed as “replacement fill slopes” per the project geotechnical report, due to the variable nature of the onsite alluvial soils. This measure shall be implemented to the satisfaction of the City Land Development Division and the City Engineer in consultation with the Project Geologist.

4.6.6.3C During all grading activities, a geotechnical engineer shall monitor site preparation, removal of unsuitable soils, mapping of all earthwork excavations, approval of imported earth materials, fill placement, foundation installation, and other geotechnical operations. Laboratory testing of subsurface materials to confirm compacted dry density and moisture content, consolidation potential, corrosion potential, expansion potential, and resistance value (R-value) shall be performed prior to and during grading as appropriate. This measure shall be implemented to the satisfaction of the City Engineer in consultation with the Project Geologist.

Level of Impact After Mitigation. Implementation of **Mitigation Measures 4.6.6.3A** through **4.6.6.3C**, and adherence to actions identified in subsequent geotechnical investigations, as well as other requirements identified and required by the City, will ensure that the potential impact from expansive soils are reduced to a less than significant level.

4.6.7 Cumulative Impacts

The cumulative area for geologic issues is the City of Moreno Valley and western Riverside County, within the larger context of southern California due to regional seismicity. The project area has potential geotechnical and soils constraints, as the entire southern California area contains a number of major regional and local faults, including the San Andreas, San Jacinto, and Elsinore Faults.

The presence of regional faults creates the potential for damage to structures or injury to persons during seismic events. However, City, County, and State regulations provide guidelines for development in areas with geologic constraints and ensure that the design of buildings is in accordance with applicable CBC standards and other applicable standards, which reduces potential property damage and human safety risks to less than significant levels. Anticipated development in the City and surrounding area in general will not have a cumulatively considerable impact on earth resources, nor will regional geotechnical constraints have a cumulatively considerable impact on the proposed WLC project or cumulative projects, as long as proper design and engineering are implemented based on available seismic and other geotechnical data. The proposed WLC project represents an incremental portion of this potential impact, so the project will not have cumulatively significant impacts in this regard.

Because it is reasonable to conclude that all development within seismically active areas will be required to adhere to applicable State regulations, CBC standards, and the design and siting standards required by local agencies, a less than significant cumulative impact would occur with implementation of the proposed WLC project.

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NOTE TO READERS. *This section has been revised in response to public comments received on the Programmatic DEIR which have resulted in project changes, updates to technical studies and revisions to EIR sections and proposed Mitigation Measures.*

4.7 GREENHOUSE GAS EMISSIONS, CLIMATE CHANGE, AND SUSTAINABILITY

This section provides a discussion of global climate change, existing regulations pertaining to global climate change, and an analysis of greenhouse gas (GHG) emissions associated with the proposed project. This analysis examines the short-term construction and long-term operational impacts and evaluates the effectiveness of measures incorporated as part of the project design.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

This section analyzes the proposed project's potential climate impacts based on the following technical study:

- *Air Quality, Greenhouse Gas, and Health Risk Assessment Report World Logistics Center Specific Plan* (Michael Brandman Associates/FirstCarbon Solutions, original dated January 2013 revised dated April 2015) contained in Appendix D of this EIR.

4.7.1 Existing Setting

4.7.1.1 Global Climate Change

Global climate change is the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The term “global climate change” is often used interchangeably with the term “global warming,” but “global climate change” is preferred by some scientists and policy makers to “global warming” because it helps convey the notion that there are other changes in addition to rising temperatures.

Climate change refers to any significant change in measures of climate such as temperature, precipitation, or wind, lasting for decades or longer (U.S. Environmental Protection Agency [EPA], 2007). Climate change may result from:

- Natural factors, such as changes in the sun’s intensity or slow changes in the Earth’s orbit around the sun;
- Natural processes within the climate system (e.g., changes in ocean circulation); and/or
- Human activities that change the atmosphere’s composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, and desertification).

The primary observed effect of global climate change has been a rise in the average global tropospheric¹ temperature of 0.36 degrees Fahrenheit (°F) per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling shows that further warming could occur, which would induce additional changes in the global climate system during the current century. Changes to the global climate system, ecosystems, and the environment of California could include higher sea levels, drier or wetter weather, changes in ocean salinity, changes in wind patterns or more energetic aspects of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold and increased intensity of tropical cyclones (hurricanes). Specific effects in California might include a decline in the Sierra Nevada snowpack, erosion of California’s coastline, and seawater intrusion in the Delta.

Human activities, such as fossil fuel combustion and land use changes release carbon dioxide (CO₂) and other compounds, cumulatively termed greenhouse gases (GHGs). GHGs are effective in trapping infrared radiation that otherwise would have escaped the atmosphere, thereby warming the atmosphere, the oceans, and earth’s surface (EPA, 2007). Many scientists believe that “most of the warming observed over the last 50 years is attributable to human activities.”² The increased amounts of CO₂ and other GHGs are alleged to be the primary causes of the human-induced component of warming.

GHGs are present in the atmosphere naturally, released by natural sources, or formed from secondary reactions taking place in the atmosphere. They include CO₂, methane (CH₄), nitrous oxide (N₂O), and ozone (O₃). In the last 200 years, substantial quantities of GHGs have been released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, enhancing the natural greenhouse effect, which is believed to be causing global climate change. While human-made GHGs include CO₂, CH₄, and N₂O, some (like chlorofluorocarbons [CFCs]) are completely new to the atmosphere.

GHGs vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The global

¹ The troposphere is the zone of the atmosphere characterized by water vapor, weather, winds, and decreasing temperature with increasing altitude.

² Intergovernmental Panel on Climate Change (IPCC), *Climate Change 2007: The Physical Science Basis*, <http://www.ipcc.ch>.

warming potential is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of each gas is measured relative to CO₂, the most abundant GHG. The definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO₂ over a specified time period. GHG emissions are typically measured in terms of metric tons of “CO₂ equivalents” (mt CO₂e or MTCO₂e).

Methane is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources include wetlands, termites, and oceans. Human-made sources include the mining and burning of fossil fuels; digestive processes in ruminant animals such as cattle; rice paddies; and the burying of waste in landfills. As for CO₂, the major removal process of atmospheric CH₄—chemical breakdown in the atmosphere—cannot keep pace with source emissions, and CH₄ concentrations in the atmosphere are increasing.

Worldwide emissions of GHGs in 2010 were approximately 47,183 million mt CO₂e¹ Emissions from the top five countries and the European Union accounted for approximately 55 percent of the total global GHG emissions, according to the most recently available data. The United States was the number two producer of GHG emissions, contributing 14 percent of the emissions. The primary GHG emitted by human activities in the United States was CO₂, representing approximately 84 percent of total GHG emissions. CO₂ from fossil fuel combustion, the largest source of GHG emissions, accounted for approximately 80 percent of the GHG emissions.²

In 2009, the United States emitted approximately 6.6 billion mt CO₂e or approximately 25 tons per year (tpy) per person. Of the six major sectors nationwide (electric power industry, transportation, industry, agriculture, commercial, and residential), the electric power industry and transportation sectors combined account for approximately 62 percent of the GHG emissions; the majority of the electrical power industry and all of the transportation emissions are generated from direct fossil fuel combustion. Between 1990 and 2006, total United States GHG emissions rose approximately 14.7 percent.³

World carbon dioxide emissions⁴ are expected to increase by 1.9 percent annually between 2001 and 2025. Much of the increase in these emissions is expected to occur in the developing world where emerging economies, such as China and India, fuel economic development with fossil energy. Developing countries’ emissions are expected to grow above the world average at 2.7 percent annually between 2001 and 2025; and surpass emissions of industrialized countries near 2018.

The California Air Resources Board (CARB) is responsible for developing the California Greenhouse Gas Emission Inventory. This inventory estimates the amount of GHGs emitted into and removed from the atmosphere by human activities within the State of California and supports the Assembly Bill (AB) 32 Climate Change Program. The most recent inventory of GHG emissions in California estimated 458.68 million mt CO₂e in 2012.⁵ This is a 1.7 percent increase in GHG emissions from 2011 and the first emissions increase since 2007. This increase was driven primarily by strong economic growth, the unexpected closure of the San Onofre Nuclear Generating Station, and drought conditions that limited in-state hydropower generation. Since 2000, GHG emissions have decreased by 1.6 percent (from 466 to 459 million mt CO₂e) after reaching a peak of 493 million mt CO₂e in 2004. The top contributor of emissions in 2012 was transportation, which contributed 37 percent of

¹ World Resources Institute, CAIT 2.0. 2013. Climate Analysis Indicators Tool: WRI's Climate Data Explorer. Washington, DC. Available at: <http://cait2.wri.org>. Accessed February 11, 2014.

² Ibid.

³ U.S. Environmental Protection Agency (EPA). 2011. *Inventory of U.S. Greenhouse Gas Emissions And Sinks: 1990 – 2009*. <http://www.epa.gov/climatechange/emissions/usinventoryreport.html>. Accessed July 2011.

⁴ <http://www.eia.gov/oiaf/1605/ggcebro/chapter1.html>.

⁵ California Air Resources Board. California Greenhouse Gas Inventory: 2000-2012. 2014 edition. www.arb.ca.gov/cc/inventory/pubs/reports/ghg_inventory_00-12_report.pdf

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the emissions. The second highest sector was industrial (22 percent), which includes sources from refineries, general fuel use, oil and gas extraction, and cement plants. The CARB staff has projected statewide GHG emissions for the year 2020 to be 509.4 million mt CO₂e.¹

The methodology used to estimate the GHG emissions from transportation differs from that used to estimate the GHG emissions for the project. The California inventory is based on fuel sales in California, while the project inventory is based on trip generation rates provided by the Traffic Impact Analysis for the project and are conservative due to the fact that conservative trip generation rates were used to estimate vehicle trips.

4.7.1.2 Effects of Global Climate Change

Climate change is a change in the average weather of the earth that is measured by alterations in wind patterns, storms, precipitation, and temperature. These changes are assessed using historical records of temperature changes occurring in the past, such as during previous ice ages. Many of the concerns regarding climate change use these data to extrapolate a level of statistical significance specifically focusing on temperature records from the last 150 years (the Industrial Age) that differ from previous climate changes in rate and magnitude.

The International Panel on Climate Change (IPCC) constructed several emission trajectories of greenhouse gases needed to stabilize global temperatures and climate change impacts. In its Fourth Assessment Report, the IPCC predicted that the global mean temperature change from 1990 to 2100, given six scenarios, could range from 1.1 degrees Celsius (°C) to 6.4 °C. Regardless of analytical methodology, global average temperatures and sea levels are expected to rise under all scenarios (IPCC 2007a). The IPCC concluded that global climate change was largely the result of human activity, mainly the burning of fossil fuels. However, the scientific literature is not consistent regarding many of the aspects of global warming or climate change, including actual temperature changes during the 20th century, the accuracy of the IPCC report, and contributions of human versus non-human activities.

Effects from global climate change may arise from temperature increases, climate-sensitive diseases, extreme weather events, and degradation of air quality. There may be direct temperature effects through increases in average temperature leading to more extreme heat waves and less extreme cold spells. Those living in warmer climates are likely to experience more stress and heat-related problems. Heat-related problems include heat rash and heat stroke. In addition, climate-sensitive diseases may increase, such as those spread by mosquitoes and other disease-carrying insects. Such diseases include malaria, dengue fever, yellow fever, and encephalitis. Extreme events such as flooding and hurricanes can displace people and agriculture. Global warming may also contribute to air quality problems from increased frequency of smog and particulate air pollution.

Additionally, the following climate change effects, which are based on trends established by the IPCC, can be expected in California over the course of the next century:

- A diminishing Sierra snowpack declining by 70 percent to 90 percent, threatening the State's water supply. If GHG emissions continue unabated, more precipitation will fall as rain instead of snow, and the snow that does fall will melt earlier.
- A rise in sea levels resulting in the displacement of coastal businesses and residences. During the past century, sea levels along California's coast have risen about seven inches. If emissions continue unabated and temperatures rise into the higher anticipated warming range, sea level is

¹ California Air Resources Board. Forecast for Updated Scoping Plan. May 27, 2014.
www.arb.ca.gov/cc/inventory/data/tables/2020_bau_forecast_by_scoping_category_2014-05-22.pdf

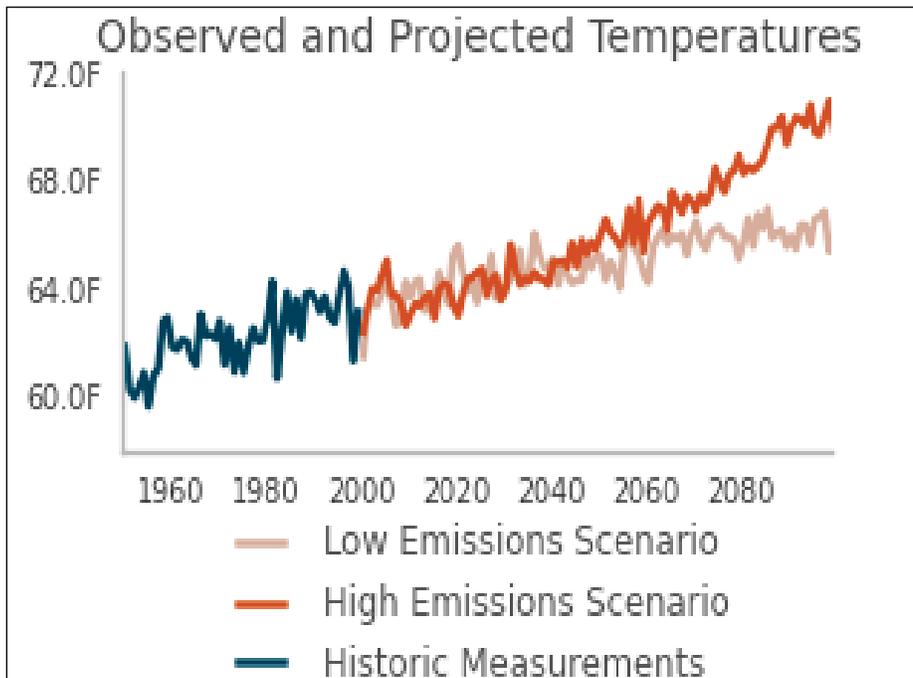
expected to rise an additional 22 to 35 inches by the end of the century. Elevations of this magnitude would inundate coastal areas with salt water, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. (Note: This condition would not affect the project area as it is a significant distance away from coastal areas.)

- An increase temperature and extreme weather events. Climate change is expected to lead to increases in the frequency, intensity, and duration of extreme heat events and heat waves in California. More heat waves can exacerbate chronic disease or heat-related illness.
- Increased risk of large wildfires if rain increases as temperatures rise. Precipitation, winds, temperature, and vegetation influence wildfire risk; therefore, wildfire risk is not uniform throughout the state. Changes in current precipitation patterns could influence that risk. As an example, wildfires in the grasslands and chaparral ecosystems of *southern* California are estimated to increase by approximately 30 percent toward the end of the 21st century because more winter rain will stimulate the growth of more plant fuel available to burn in the fall. In contrast, a hotter, drier climate could promote up to 90 percent more *northern* California fires by the end of the century by drying out and increasing the flammability of forest vegetation.
- Increasing temperatures from 8 to 10.4°F under the higher emission scenarios, leading to a 25 percent to 35 percent increase in the number of days ozone pollution levels are exceeded in most urban areas (see below).
- Increased vulnerability of forests due to forest fires, pest infestation, and increased temperatures.
- Reductions in the quality and quantity of certain agricultural products. The crops and products likely to be adversely affected include wine grapes, fruit, nuts, and milk.
- Exacerbation of air quality problems. If temperatures rise to the medium warming range, there could be 75 to 85 percent more days with weather conducive to ozone formation in Los Angeles and the San Joaquin Valley, relative to today's conditions. This is more than twice the increase expected if rising temperatures remain in the lower warming range. This increase in air quality problems could result in an increase in asthma and other health-related problems.
- A decrease in the health and productivity of California's forests. Climate change can cause an increase in wildfires, an enhanced insect population, and establishment of non-native species.
- Increased electricity demand, particularly in the hot summer months.
- Increased ground-level ozone formation due to higher reaction rates of ozone precursors.

Note: The following text regarding specific consequences of climate change in Moreno Valley was in the 2013 report; minor revisions were made and it has been added to this section.

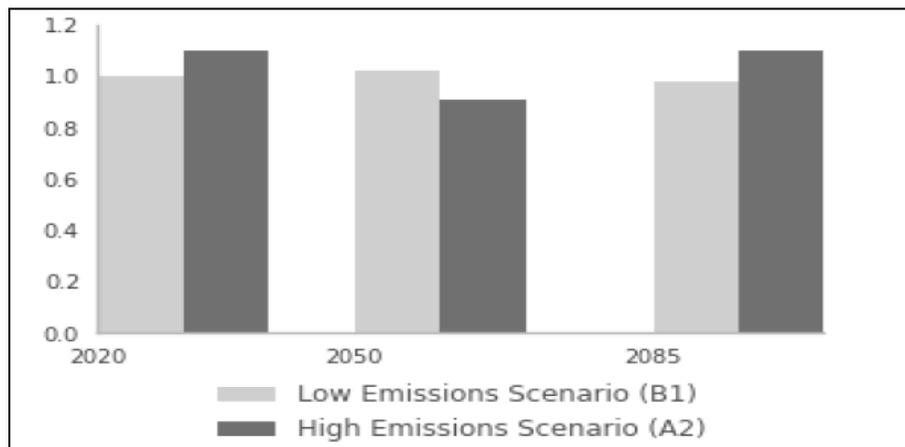
Consequences of Climate Change in Moreno Valley. The figure below displays a chart of measured historical and projected annual average temperatures in the Moreno Valley area. As shown in the figure, temperatures are expected to rise in the low and high GHG emissions scenarios.

Water for the project would be provided by the Eastern Municipal Water Department (EMWD). The EMWD 2010 Urban Water Management Plan considered the impact of climate change on water supplies as part of its long-term strategic planning. One of the outcomes of climate change could be more frequent limitations on imported supplies. To limit the impact of climate change, EMWD's long-term planning focuses on the development of reliable local resources and the implementation of water use efficiency. This includes the full utilization of recycled water and the recharge of local groundwater basins to increase supply reliability during periods of water shortage. EMWD is also focused on reducing demand for water supplies, especially outdoors. Increasing the use of local resource and reducing the need for imported water has the dual benefit of not only improving water quality reliability, but reducing the energy required to import water to EMWD's service area.



The figure below displays the fire risk in Moreno Valley relative to 2010 levels. The figure displays the projected increase in potential area burned given three different 30-year averaging periods ending in 2020, 2050, and 2085 and two different scenarios (A2, B1). The data are modeled solely on climate projections and do not take landscape and fuel sources into account (there is very little combustible material in the project area). The data modeled the ratio of additional fire risk for an area as compared to the expected burned area. The data are shown in the figure below and indicate that under the low-emissions scenario, the additional wildfire risk is about 1, which means that wildfire risk is expected to remain about the same. Under the high-emission scenario, additional risk is variable with a slight increase. Other areas in California, such as the area near the border with Oregon, are projected to have a 9-fold increase in potential area burned.

Wildfire Risk in Moreno Valley



4.7.1.3 Greenhouse Gases

The most common greenhouse gases include water vapor, carbon dioxide, methane, nitrous oxides, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, ozone, and aerosols. Greenhouse gases defined by AB 32 include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

Natural processes and human activities emit greenhouse gases. The presence of greenhouse gases in the atmosphere affects the earth's temperature. Many scientists believe that emissions from human activities, such as electricity production and vehicle use, have led to elevated concentrations of these gases in the atmosphere beyond the level of naturally occurring concentrations. Table 4.7.A lists greenhouse gases, the effects of each greenhouse gas, and some of the sources for each of the greenhouse gases.

Climate change is driven by radiative forcings and feedbacks. Radiative forcing is the difference between the incoming energy and outgoing energy in the climate system. In other terms, radiative forcing is the energy absorbed by the greenhouse gas that would otherwise be lost to space. Positive forcing tends to warm the surface while negative forcing tends to cool it. A feedback is a climate process that can strengthen or weaken a forcing. For example, when ice or snow melts, it reveals darker land underneath, which absorbs more radiation and causes more warming.

In order to attempt to quantify the impact of greenhouse gases, the gases are assigned global warming potentials. Individual greenhouse gas compounds have varying global warming potential and atmospheric lifetimes. Carbon dioxide, the reference gas for global warming potential, has a global warming potential of one. The global warming potential of a greenhouse gas is a potential of a gas or aerosol to trap heat in the atmosphere compared to the reference gas, carbon dioxide, and is a measurement of the radiative forcing of a gas. There are positive (warming) and negative (cooling) forcings. To describe how much global warming a given type and amount of greenhouse gas may cause, the carbon dioxide equivalent is used. The calculation of the carbon dioxide equivalent is a consistent methodology for comparing greenhouse gas emissions since it normalizes various greenhouse gas emissions to a consistent reference gas, carbon dioxide. Carbon dioxide as a molecule has a certain potential for warming; other molecules have a different potential. For example, methane's warming potential of 21 indicates that methane has 21 times greater warming effect than carbon dioxide on a molecule per molecule basis. A carbon dioxide equivalent is the mass emissions of an individual greenhouse gas multiplied by its global warming potential.

Note: The following information is added in response to comments received on the Draft EIR. In addition, black carbon is now estimated in the GHG inventory.

Black Carbon. A specific aerosol of concern is black carbon. Black carbon is a light absorbing component of particulate matter and is formed by the incomplete combustion of fossil fuels, biofuels, and biomass. The following is additional information on black carbon:

- Black carbon is emitted directly into the atmosphere in the form of fine particles (PM_{2.5}).
- Black carbon contributes to the adverse impacts on human health, ecosystems, and visibility associated with PM_{2.5}.
- Black carbon influences climate by: 1) directly absorbing light, 2) reducing the reflectivity ("albedo") of snow and ice through deposition, and 3) interacting with clouds.
- The direct and snow/ice albedo effects of black carbon are widely understood to lead to climate warming. However, the globally averaged net climate effect of black carbon also includes the effects associated with cloud interactions, which are not well quantified and may cause either warming or cooling. Therefore, though most estimates indicate that black carbon has a net warming influence, a net cooling effect cannot be ruled out.

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Table 4.7.A: Greenhouse Gas Properties, Effects, and Sources

Constituent	Description and Physical Properties	Health Effects	Sources
Water Vapor	Water vapor (H ₂ O) is the most abundant, important, and variable greenhouse gas in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization.	There are no health effects from water vapor. When some pollutants come in contact with water vapor, they can dissolve and then the water vapor can be a transport mechanism to enter the human body.	The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.
Carbon Dioxide	Carbon dioxide (CO ₂) is an odorless, colorless natural greenhouse gas.	Outdoor levels of carbon dioxide are not high enough to result in negative health effects.	Carbon dioxide is emitted from natural and anthropogenic (human) sources. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungi; evaporation from oceans; and volcanic out gassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood.
Methane	Methane (CH ₄) is an extremely effective GHG with a global warming potential of 21, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10–12 years) compared to other greenhouse gases.	There are no health effects from methane.	Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning.
Nitrous Oxide	Nitrous oxide (N ₂ O), also known as laughing gas, is a colorless greenhouse gas. It has a lifetime of 114 years. Its global warming potential is 310.	Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses it is harmless. In some cases, heavy and extended use can cause Olney's Lesions (brain damage).	Concentrations of nitrous oxide also began to rise at the beginning of the Industrial Revolution. In 1998, the global concentration was 314 ppb. Nitrous oxide is produced by microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, e.g. in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars.
Chloro-fluorocarbons	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C ₂ H ₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). Global warming potentials range from 3,800 to 8,100.	In confirmed indoor locations, working with CFC-113 or other CFCs is thought to have resulted in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.	CFCs have no natural source, but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.
Hydro-fluorocarbons	Hydrofluorocarbons (HFCs) are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the greenhouse gases, they are one of three groups with the highest global warming potential (depending on the gas, ranges from 140 to 11,700). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant.	None.	HFCs are man-made for applications such as automobile air conditioners and refrigerants.
Per-fluorocarbons	Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF ₄) and hexafluoroethane (C ₂ F ₆). Global warming potentials range from 6,500 to 9,200.	None.	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
Sulfur Hexafluoride	Sulfur hexafluoride (SF ₆) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated, 23,900. Concentrations in the 1990s were about 4 ppt. It has a lifetime of 3,200 years.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.	Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.
Aerosols	Aerosols are particles emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light. Cloud formation can also be affected by aerosols.	Similar health effects associated with particulate matter (see Section 4.3, Air Quality, for a description of the health effects of particulate matter).	Sulfate aerosols are emitted when fuel containing sulfur is burned. Another source of aerosols (in the form of black carbon or soot) is the result of incomplete combustion or the incomplete burning of fossil fuels. Although particulate matter regulation has been lowering aerosol concentrations in the United States, global concentrations are likely increasing as a result of other sources around the world.

Source: LSA Associates 2012 as summarized from the *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015

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- Sensitive regions such as the Arctic and the Himalayas are particularly vulnerable to the warming and melting effects of black carbon.
- Black carbon is emitted with other particles and gases, many of which exert a cooling influence on climate. Therefore, estimates of the net effect of black carbon emissions sources on climate should include the offsetting effects of these co-emitted pollutants. This is particularly important for evaluating mitigation options.
- Black carbon’s short atmospheric lifetime (days to weeks), combined with its strong warming potential, means that targeted strategies to reduce black carbon emissions can be expected to provide climate benefits within the next several decades.
- The different climate attributes of black carbon and long-lived GHGs make it difficult to interpret comparisons of their relative climate impacts based on common metrics.
- Based on recent emissions inventories, the majority of global black carbon emissions come from Asia, Latin America, and Africa. Emissions patterns and trends across regions, countries and sources vary significantly.
- Control technologies are available to reduce black carbon emissions from a number of source categories.
- Black carbon mitigation strategies, which lead to reductions in PM_{2.5}, can provide substantial public health and environmental benefits.

4.7.1.4 Greenhouse Gas Inventories

The City of Moreno Valley estimated greenhouse gas emissions for the community for 2007 and 2010 and projected emissions for 2020 are shown in Table 4.7.B, which shows the reduced 2020 emissions are below the reduction target. The emissions shown are not actual emissions but are estimated using calculations and assumptions. The emissions represent emissions from the community of Moreno Valley (as opposed to the city government operations). Only select years were estimated based on data available.

Table 4.7.B: City of Moreno Valley Projected Greenhouse Gas Emissions

Source Category	Moreno Valley Greenhouse Gas Emissions (mt CO ₂ e per year)			
	2007	2010	BAU 2020	Reduced 2020
Transportation	517,098	513,581	788,267	421,561
Energy	287,261	277,230	356,192	251,372
Area	69,390	69,437	84,665	73,046
Water and Wastewater	21,595	16,831	20,216	14,158
Solid Waste	44,294	43,633	49,203	38,000
Total	939,638	920,712	1,298,543	798,137
Reduction Target	—	—	798,693	798,693

Notes: mt CO₂e = metric tons of carbon dioxide equivalents BAU = business as usual
Source: Table 9, City of Moreno Valley Greenhouse Gas Analysis, 2012.

The existing WLC project site is largely vacant with scattered dry farming that generates minimal greenhouse gas emissions. For the purposes of this analysis, a zero baseline will be assumed to identify the “worst case” emissions (i.e., GHG emissions from the entire WLC project without removal of any existing GHG emissions).

4.7.2 Regulatory Setting

4.7.2.1 International Regulation of Climate Change

Intergovernmental Panel on Climate Change (IPCC). In 1988, the United Nations created the IPCC to provide independent scientific information regarding climate change to policymakers. The IPCC does not conduct research itself, but rather compiles information from a variety of sources into reports regarding climate change and its impacts. The IPCC has thereafter periodically released reports on climate change, and in 2007 released its Fourth Assessment Report which concluded most global climate change was the result of human activity, mainly the burning of fossil fuels (see Section 4.7.1.1).

United Nations Framework Convention on Climate Change. On March 21, 1994, the United States joined a number of countries around the world in signing the United Nations Framework Convention on Climate Change (Convention). Under the Convention, governments gather and share information on greenhouse gas emissions, national policies, and best practices; launch national strategies for addressing greenhouse gas emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

Kyoto Protocol. The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing greenhouse gas emissions at average of five per cent against 1990 levels over the five-year period 2008-2012. The Convention (discussed above) encouraged industrialized countries to stabilize emissions; however, the Protocol commits them to do so. Developed countries have contributed more emissions over the last 150 years; therefore, the Protocol places a heavier burden on developed nations under the principle of “common but differentiated responsibilities.” The United States has not entered into force of the Kyoto Protocol.

Moreover, since the United States declined to ratify the Kyoto Protocol in 1995, it has become increasingly clear that global climate change cannot be addressed without limiting GHG emissions from developing, as well as developed, countries. According to many sources, China has already surpassed the United States as the world's largest GHG emitter and is building new coal-fired power plants at a rate of approximately one per week. A recent study conducted by economists at the UC Berkeley and UC San Diego estimated that China's CO₂ emissions are growing by as much as 11 percent annually. In 2007, China released its first national plan on climate change, which includes goals related to increasing energy efficiency and increasing use of renewable resources. The plan, however, makes no commitments regarding reduction of GHG emissions.

Like China, India is already one of the top emitters of GHGs and continues to grow rapidly. India has recently pledged to take more action to fight global warming, for example, by pursuing solar energy, urging energy efficiency, and conservation, but it has not set any concrete goals in these areas, let alone pledged to reduce its carbon emissions. To the contrary, India's emissions are projected to increase fourfold by 2030 (see “Melting Asia,” *The Economist*, June 5, 2008). Similarly, Brazil, the largest economy in South America, and another rapidly developing country, has no national policy requiring it to reduce carbon emissions. Brazil's carbon emissions increased by more than 60 percent between 1990 and 2004, and are projected to continue to rise at a similar pace (see International Energy Agency, *World Energy Outlook 2006*).

The Kyoto Protocol expired in 2012. Formal negotiations to replace the protocol officially began in December 2007 at the UNFCCC Climate Change Conference in Bali, Indonesia (<http://unfccc.int/.php>). Whether a workable agreement can be reached, however, remains to be seen, as the United

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Clean Vehicles. Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the United States. On April 1, 2010, the EPA and the Department of Transportation's Highway Traffic and Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce greenhouse gas emissions and improve fuel economy for new cars and trucks sold in the United States.

The first phase of the national program would apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The vehicles must meet an estimated combined average emissions level of 250 grams of carbon dioxide per mile, equivalent to 35.5 miles per gallon if the automobile industry were to meet this carbon dioxide level solely through fuel economy improvements. Together, these standards would cut carbon dioxide emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The EPA and the National Highway Safety Administration are working on a second-phase rule to establish national standards for light-duty vehicles for model years 2017 and beyond.

On October 25, 2010, the EPA and the U.S. Department of Transportation proposed the first national standards to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20 percent reduction in carbon dioxide emissions and fuel consumption by the 2018 model year. For heavy-duty pickup trucks and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10 percent reduction for gasoline vehicles and up to a 15 percent reduction for diesel vehicles by 2018 model year (12% and 17% respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles (includes other vehicles like buses, refuse trucks, concrete mixers; everything except for combination tractors and heavy-duty pickups and vans), the agencies are proposing engine and vehicle standards starting in the 2014 model year, which would achieve up to a 10 percent reduction in fuel consumption and carbon dioxide emissions by the 2018 model year.

Mandatory Reporting of GHG. The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of Greenhouse Gases rule. The rule requires reporting of GHG emissions from large sources and suppliers in the United States, and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions, are required to submit annual reports to the EPA.

This rule does not apply to high cube logistics developers within the WLC Project because, although the project would emit more than 25,000 mt CO₂e per year of GHGs, the rule only applies to the following categories: fossil fuel suppliers and industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and engines. The EPA's Applicability Tool was used to determine if the project developer would need to report the GHG emissions. The source categories that are required to report GHG emissions (i.e., production, manufacturing, electricity generation, and industrial waste landfills) did not apply to the project.

New Source Review Prevention of Significant Deterioration (GHG Tailoring Rule). The EPA issued a final rule on May 13, 2010, that establishes thresholds for greenhouse gases that define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. Operating permits

are legally enforceable documents that permitting authorities issue to air pollution sources after the source has begun to operate. Title V Operating Permits are required from Title V of the Clean Air Act. This final rule “tailors” the requirements of these Clean Air Act permitting programs to limit which facilities will be required to obtain Prevention of Significant Deterioration and Title V permits. In the preamble to the revisions to the Federal Code of Regulations, the EPA states:

This rulemaking is necessary because without it the Prevention of Significant Deterioration and Title V requirements would apply, as of January 2, 2011, at the 100 or 250 tons per year levels provided under the Clean Air Act, greatly increasing the number of required permits, imposing undue costs on small sources, overwhelming the resources of permitting authorities, and severely impairing the functioning of the programs. EPA is relieving these resource burdens by phasing in the applicability of these programs to greenhouse gas sources, starting with the largest greenhouse gas emitters. This rule establishes two initial steps of the phase-in. The rule also commits the agency to take certain actions on future steps addressing smaller sources, but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for greenhouse gas emissions until at least April 30, 2016.

EPA estimates that facilities responsible for nearly 70 percent of the national greenhouse gas emissions from stationary sources will be subject to permitting requirements under this rule. This includes the nation’s largest greenhouse gas emitters—power plants, refineries, and cement production facilities.

On December 23, 2010, the EPA issued a series of rules that put the necessary regulatory framework in place to ensure that 1) industrial facilities can get Clean Air Act permits covering their GHG emissions when needed and 2) facilities emitting GHGs at levels below those established in the Tailoring Rule do not need to obtain Clean Air Act permits.

Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units. As required by a settlement agreement, the EPA proposed new performance standards for emissions of carbon dioxide for new affected fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatt would be required to meet an output based standard of 1,000 pounds of carbon dioxide per megawatt-hour.

Cap and Trade. Cap and trade refers to a policy tool where emissions are limited to a certain amount and can be traded, or provides flexibility on how the emitter can comply. Successful examples in the United States include the Acid Rain Program and the NO_x Budget Trading Program in the northeast. There is no Federal cap and trade program currently and no pending legislation exists to establish a cap and trade program.

Energy Policy and Conservation Act. The Energy Policy and Conservation Act of 1975 sought to ensure that all vehicles sold in the U.S. would meet certain fuel economy goals. Through this Act, Congress established the first fuel economy standards for on-road motor vehicles in the U.S. Pursuant to the Act, the National Highway Traffic and Safety Administration (NHTSA), which is part of the U.S. Department of Transportation (USDOT), is responsible for establishing additional vehicle standards and for revising existing standards. Since 1990, the fuel economy standard for new passenger cars has been 27.5 miles per gallon (mpg). Since 1996, the fuel economy standard for new light trucks (gross vehicle weight of 8,500 pounds or less) has been 20.7 mpg. The Corporate Average Fuel Economy (CAFE) program, administered by the EPA, was created to determine vehicle manufacturers’ compliance with the fuel economy standards. The EPA calculates a CAFE value for each manufacturer based on city and highway fuel economy test results and vehicle sales. Based on

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the information generated under the CAFE program, the USDOT is authorized to assess penalties for noncompliance. Please also refer to the subsection, “Clean Vehicles,” above.

Energy Policy Act of 1992. The Energy Policy Act (EPAcT) of 1992 was passed to reduce the country’s dependence on foreign petroleum and improve air quality. EPAcT includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. EPAcT requires certain Federal, State, and local governments and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPAcT. Federal tax deductions will be allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the Act to consider a variety of incentive programs to help promote AFVs.

Energy Policy Act of 2005. The Energy Policy Act of 2005 includes provisions for renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a Federal purchase requirement for renewable energy.

4.7.2.3 State Regulations/Standards

California Code of Regulations Title 24, Part 6. Enacted in 1978, this part of the California Code established energy efficiency standards for residential and nonresidential buildings in response to a legislative mandate to reduce California’s energy consumption. These standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The most recent standards (2013 Building Energy Efficiency Standards) were adopted and went into effect went into effect July 1, 2014.¹ Such standards include the provision of cool roofs, demand control ventilation, skylights for day-lighting in buildings, thermal breaks for metal building roofs, and lighting power limits. These standards are expected to reduce the growth in electricity use of residential and non-residential buildings. Continual updates to Title 24 along with the State’s implementation of AB 1493 and SB 1368 will have a major impact on the State’s attainment of the AB 32 goals.

California Code of Regulations Title 24, Part 11. This part of the California Code is known as the California Green Building Standards Code (CALGreen Code) and was enacted to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts with positive environmental impacts and through encouragement of sustainable construction practices. The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). This update to Part 11 of Title 24 of the California Code of Regulations was effective January 1, 2011. Key provisions of the CALGreen Code that apply to the type of new non-residential development proposed for the project site are as follows:

Division 5.1—Planning and Design

Section 5.106 Site Development

5.106.4 Bicycle Parking and Changing Rooms:

¹ 2013 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, California Energy Commission, effective July 1, 2014, <http://www.energy.ca.gov/title24/2013standards/>

Short-term bicycle parking. If the new project or an addition or alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1).

Long-term bicycle parking. For buildings with over 10 tenant-occupants or alterations that add 10 or more tenant vehicular parking spaces, provide secure bicycle parking for 5 percent of tenant vehicular parking spaces being added, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and shall meet the following: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; or 3. Lockable, permanently anchored bicycle lockers (5.106.4.2).

5.106.5 Clean Air Vehicle Parking: For new projects or additions or alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles [201 spaces and over require at least 8 percent] (5.106.5.2).

5.106.8 Light Pollution Reduction (specific backlight, uplight, and glare ratings)

5.106.10 Grading and Paving: Construction plans shall indicate how site grading or a drainage system will manage all surface water flows to keep water from entering buildings.

Division 5.2—Energy Efficiency

Section 5.201.1 Energy Efficiency (Mandatory energy efficiency standards through California Code of Regulations, Title 24, Part 6)

Division 5.3—Water Efficiency and Conservation

Section 5.303 Indoor Water Use

5.303.1 Meters: Separate water meters for buildings in excess of 50,000 sq. ft or buildings projected to consume more than 1,000 gallons per day.

5.303.2 Twenty Percent Savings: Use of plumbing fixtures and fittings that will reduce the overall use of potable water within the building by 20 percent, based on the maximum allowable water use per fixture and fitting as required by the California Building Code (California Code of Regulations, Title 24, Part 2)

5.304.3 Irrigation design: Automatic irrigation system controllers installed at the time of final inspection shall be weather- or soil moisture-based controllers that adjust irrigation in response to changes in plant needs; weather-based controllers.

5.303.4 Wastewater Reduction: Each building shall reduce by 20 percent wastewater by one of the following methods: 1. The installation of water-conserving fixtures or 2. Use of non-potable water systems (5.303.4).

5.303.6 Plumbing Fixtures and Fittings

Section 5.304 Outdoor Water Use

5.304.1 Water Budget: A water budget shall be developed for landscape irrigation use that conforms to the local water efficient landscape ordinance or to the California Department of Water Resources Model Water Efficient Landscape Ordinance where no local ordinance is applicable.

5.304.2 Outdoor Water Use (separate submeters or metering devices)

5.304.3 Irrigation Design (irrigation controllers and sensors)

Division 5.4—Material Conservation and Resource Efficiency

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Section 5.407 Water Resistance and Moisture Management

Section 5.408 Construction Waste Reduction, Disposal and Recycling

5.408.1 and 5.408.3 Construction Waste Diversion: Recycle and/or salvage for reuse a minimum 50 percent of the nonhazardous construction and demolition waste. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting from land clearing shall be reused or recycled.

5.408.2 Construction Waste Management Plan

Section 5.410 Building Maintenance and Operation

5.410.1 and 5.713.10 Recycling by Occupants: Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling.

Division 5.5—Environmental Quality

Section 5.504 Pollutant Control

5.504.3 Covering of Duct Openings and Protection of Mechanical Equipment During Construction

5.504.4 Finish Material Pollutant Control: Low-pollutant emitting interior finish materials such as adhesives, paints, carpet, and flooring

5.504.5.3 Filters: Minimum Efficiency Reporting Value (MERV) of 8 or higher in mechanically ventilated buildings.

California Code of Regulations Titles 14 and 27. These parts of the California Code require energy-efficient practices as part of solid and hazardous waste handling and disposal.

Pavley Regulations and Fuel Efficiency Standards. California AB 1493, enacted on July 22, 2002, required the CARB to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks. The regulation was stalled by automaker lawsuits and by the EPA's denial of an implementation waiver. On January 21, 2009, the CARB requested that the EPA reconsider its previous waiver denial. On January 26, 2009, President Obama directed that the EPA assess whether the denial of the waiver was appropriate. On June 30, 2009, the EPA granted the waiver request. On September 8, 2009, the U.S. Chamber of Commerce and the National Automobile Dealers Association sued the EPA to challenge its granting of the waiver to California for its standards. California assisted the EPA in defending the waiver decision. The U.S. District Court for the District of Columbia denied the Chamber's petition on April 29, 2011.

The standards phase in during the 2009 through 2016 model years. When fully phased in, the near term (2009–2012) standards will result in about a 22 percent reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards will result in about a 30 percent reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

Low Carbon Fuel Standard, Executive Order S-01-07. The Governor signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In particular, the

executive order established a Low Carbon Fuel Standard and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission (CEC), the CARB, the University of California, and other agencies to develop and propose protocols for measuring the “life-cycle carbon intensity” of transportation fuels. The CARB adopted the Low Carbon Fuel Standard on April 23, 2009. The Low Carbon Fuel Standard requires producers of petroleum based fuels to reduce the carbon intensity of their products, beginning with a quarter of a percent in 2011, ending in a 10 percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products, or buy LCFS Credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas or hydrogen. The Low Carbon Fuel Standard was challenged in the United States District Court in Fresno in 2011. The court’s ruling issued on December 29, 2011, included a preliminary injunction against the CARB’s implementation of the rule. The Ninth Circuit Court of Appeals stayed the injunction on April 23, 2012 pending final ruling on appeal, allowing the CARB to continue to implement and enforce the regulation and vacated the injunction on September 18, 2013, and remanded the case to the district court for further consideration.

Senate Bill (SB) 1368. In 2006, the State Legislature adopted SB 1368, which was subsequently signed into law by the Governor. SB 1368 directs the California Public Utilities Commission (CPUC) to adopt a performance standard for greenhouse gas emissions for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. Because of the carbon content of its fuel source, a coal-fired plant cannot meet this standard because such plants emit roughly twice as much carbon as combined cycle natural gas power plants. Accordingly, the new law will effectively prevent California’s utilities from investing in, financially supporting, or purchasing power from new coal plants located in or out of the State. Thus, SB 1368 will lead to dramatically lower greenhouse gas emissions associated with California’s energy demand, as SB 1368 will effectively prohibit California utilities from purchasing power from out-of-state producers that cannot satisfy the performance standard for greenhouse gas emissions required by SB 1368. The CPUC adopted the regulations required by SB 1368 on August 29, 2007.

SB 97 and the CEQA Guidelines Update. Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states “(a) On or before July 1, 2009, the Office of Planning and Research shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the California Governor’s Office of Planning and Research (OPR) pursuant to subdivision (a).” Section 21097 was also added to the Public Resources Code. It provided CEQA protection until January 1, 2010, for transportation projects funded by the Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006 or projects funded by the Disaster Preparedness and Flood Prevention Bond Act of 2006, in stating that the failure to analyze adequately the effects of greenhouse gases would not violate CEQA.

On April 13, 2009, the OPR submitted to the Secretary for Natural Resources its recommended amendments to the *CEQA Guidelines* for addressing greenhouse gas emissions. On July 3, 2009, the Natural Resources Agency commenced the Administrative Procedure Act rulemaking process for certifying and adopting these amendments pursuant to Public Resources Code section 21083.05. Following a 55-day public comment period and two public hearings, the Natural Resources Agency proposed revisions to the text of the *CEQA Guidelines* amendments. The Natural Resources Agency transmitted the adopted amendments and the entire rulemaking file to the Office of Administrative Law on December 31, 2009. On February 16, 2010, the Office of Administrative Law approved the

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Amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The Amendments became effective on March 18, 2010.

The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of greenhouse gas emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing *CEQA Guidelines* to reference climate change.

A new section, *CEQA Guidelines* Section 15064.4, was added to assist agencies in determining the significance of GHG emissions. The new section allows agencies the discretion to determine whether a quantitative or qualitative analysis is best for a particular project. However, the *CEQA Guidelines* offer little guidance on the crucial next step in this assessment process—how to determine whether the project’s estimated greenhouse gas emissions are significant or cumulatively considerable.

Also amended were *CEQA Guidelines* Sections 15126.4 and 15130, which address mitigation measures and cumulative impacts respectively. Greenhouse gas mitigation measures are referenced in general terms, but no specific measures are championed. The revision to the cumulative impact discussion requirement (Section 15130) simply directs agencies to analyze greenhouse gas emissions in an EIR when a project’s incremental contribution of emissions may be cumulatively considerable; however, it does not answer the question of how to determine whether emissions are cumulatively considerable.

Section 15183.5 permits programmatic greenhouse gas analysis and later project-specific tiering. A tiered project is a project that was addressed in a certified program document, such as an EIR or Mitigated Negative Declaration. The *CEQA Guidelines* state the following:

Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review. Project-specific environmental documents may rely on an EIR containing a programmatic analysis of greenhouse gas emissions (Section 15183.5(a)).

Compliance with plans for the reduction of GHG emissions can support a determination that a project’s cumulative effect is not cumulatively considerable, according to proposed Section 15183.5(b).

In addition, the amendments revised Appendix F of the *CEQA Guidelines*, which focuses on energy conservation. The sample environmental checklist in the *CEQA Guidelines’* Appendix G was amended to include greenhouse gas impact questions, which are used in this analysis (see Section 4.7.4).

Executive Order S-3-05. Executive Order S-3-05 was signed by Governor Schwarzenegger in 2005 proclaiming California is vulnerable to the impacts of climate change. It states that increased temperatures could reduce the Sierra Nevada’s snowpack, worsen California’s air quality problems, and potentially cause a rise in sea levels. The Executive Order establishes total GHG emission targets including emissions reductions to the 2000 level by 2010, and the 1990 level by 2020, and to 80 percent below the 1990 level by 2050. The 2050 reduction goal represents what scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be an aggressive, but achievable, mid-term target.

Assembly Bill 32 (AB 32). California’s major initiative for reducing GHG emissions is outlined in AB 32, the “Global Warming Solutions Act,” passed by the California State legislature on August 31,

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2006. This effort aims at reducing GHG emissions to 1990 levels by 2020. The original 2020 GHG emissions limit was 427 million mt CO₂e. The current 2020 GHG emissions limit is 431 million mt CO₂e. AB 32 requires the CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change.

The Scoping Plan was approved by the CARB on December 11, 2008, and includes measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures.¹ The Scoping Plan includes a range of GHG reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. The Scoping Plan, even after Board approval, remains a recommendation. The measures in the Scoping Plan will not be binding until after they are adopted through the normal rulemaking process. The CARB rule-making process includes preparation and release of each of the draft measures, public input through workshops and a public comment period, followed by a CARB hearing and rule adoption.

Pursuant to AB 32, the CARB and the Climate Action Team (CAT)² did the following:

- Adopted a list of discrete early action measures;
- Established a statewide GHG emissions cap for 2020 based on 1990 emissions and adopted mandatory reporting rules for significant sources of GHG;
- Indicated how emission reductions will be achieved from significant GHG sources via regulations, market mechanisms and other actions; and
- Adopted regulations to achieve the maximum technologically feasible and cost-effective reductions in GHG, including provisions for using both market mechanisms and alternative compliance mechanisms.

In June 2007, the CARB approved a list of 37 early action measures, including three discrete early action measures (Low Carbon Fuel Standard, Restrictions on High Global Warming Potential Refrigerants, and Landfill Methane Capture). Discrete early action measures are measures that were required to be adopted as regulations and made effective no later than January 1, 2010, the date established by Health and Safety Code (HSC) Section 38560.5. The CARB adopted additional early action measures in October 2007³ that tripled the number of discrete early action measures. These measures relate to truck efficiency, port electrification, reduction of perfluorocarbons from the semiconductor industry, reduction of propellants in consumer products, proper tire inflation, and sulfur hexafluoride (SF₆) reductions from the non-electricity sector. The combination of early action measures was estimated to reduce statewide GHG emissions by nearly 16 million mt CO₂e.⁴

AB 32 codifies Executive Order S-3-05's⁵ year 2020 goal by requiring that statewide GHG emissions be reduced to 1990 levels by the year 2020.

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the GHG emissions that cause climate change. The program is a central element of AB 32 and covers major sources of GHG emissions in the State such as refineries, power plants,

¹ CARB, *Climate Change Proposed Scoping Plan: a Framework for Change*, October 2008.

² CAT is a consortium of representatives from State agencies who have been charged with coordinating and implementing GHG emission reduction programs that fall outside of CARB's jurisdiction.

³ CARB. 2007. *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration*. October.

⁴ CARB. 2007. "ARB approves tripling of early action measures required under AB 32." News Release 07-46. <http://www.arb.ca.gov/newsrel/nr102507.htm>. October 25.

⁵ Executive Order S-3-05 establishes greenhouse gas emission reduction targets for California.

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industrial facilities, and transportation fuels. The regulation includes an enforceable GHG cap that will decline over time. The CARB will distribute allowances, which are tradable permits, equal to the emission allowed under the cap. The program started on January 1, 2012, with the first offset credit auctions in November 2012 and an enforceable compliance obligation beginning with 2013 GHG emissions. For the first two years of the program, large industrial emitters will receive 90 percent of their allowances for free in a soft start meant to give companies time to reduce emissions through new technologies or other means. The cap, or number of allowances, will decline over time in an effort to drastically reduce greenhouse gas emissions by 2050.

The California Chamber of Commerce filed suit¹ challenging the validity of the state's cap-and-trade program. The suit challenges the California Air Resources Board's authority as stated under AB 32 to sell the permits, called "allowances," for the purpose of generating revenue for the state. It is also challenging the sale of allowances as an illegal tax, arguing that taxes need a two-thirds vote by the Legislature. The suit was rejected on November 12, 2013, by the California Superior Court.

Scoping Plan. The California State Legislature adopted AB 32 in 2006 which focuses on reducing greenhouse gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, the CARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which outlines actions recommended to obtain that goal. The Scoping Plan calls for an "ambitious but achievable" reduction in California's greenhouse gas emissions, cutting approximately 30 percent from BAU emission levels projected for 2020, or about 10 percent from today's levels. On a per-capita basis, that means reducing annual emissions of 14 tons of carbon dioxide for every man, woman, and child in California down to about 10 tons per person by 2020.

The Scoping Plan² contains the following 18 strategies to reduce the State's emissions:

1. *California Cap-and-Trade Program Linked to Western Climate Initiative.* Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.
2. *California Light-Duty Vehicle Greenhouse Gas Standards.* Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.
3. *Energy Efficiency.* Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.
4. *Renewable Portfolio Standard.* Achieve 33 percent renewable energy mix statewide. Renewable energy sources include (but are not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.
5. *Low Carbon Fuel Standard.* Develop and adopt the Low Carbon Fuel Standard.
6. *Regional Transportation-Related Greenhouse Gas Targets.* Develop regional greenhouse gas emissions reduction targets for passenger vehicles. This measure refers to SB 375.
7. *Vehicle Efficiency Measures.* Implement light-duty vehicle efficiency measures.

¹ The Huffington Post, November 14, 2012, http://www.huffingtonpost.com////s-cap-and-trade_n_2131251.html).

² Scoping Plan Reduction Measures from California Air Resources Board 2008.

8. *Goods Movement.* Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.
9. *Million Solar Roofs Program.* Install 3,000 MW of solar-electric capacity under California's existing solar programs.
10. *Medium/Heavy-Duty Vehicles.* Adopt medium and heavy-duty vehicle efficiency measures.
11. *Industrial Emissions.* Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.
12. *High Speed Rail.* Support implementation of a high-speed rail system.
13. *Green Building Strategy.* Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.
14. *High Global Warming Potential Gases.* Adopt measures to reduce high global warming potential gases.
15. *Recycling and Waste.* Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.
16. *Sustainable Forests.* Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.
17. *Water.* Continue efficiency programs and use cleaner energy sources to move and treat water.
18. *Agriculture.* In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.

The First Update to the Scoping Plan was approved by the CARB on May 22, 2014. The First Update builds upon the initial Scoping Plan with new strategies and recommendations. The Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The Update defines CARB's climate change priorities for the next five years and sets the groundwork to reach California's post-2020 climate goals set forth in Executive Orders S-3-05 and B-16-2012. The Update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals defined in the initial Scoping Plan. It will also evaluate how to align the State's longer-term GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use.

Executive Order B-16-2012 (Zero-Emission Vehicles). This executive order indicates that all State entities under the Governor's control support and facilitate the rapid commercialization of zero-emission vehicles. The order contains a target similar to Executive Order S-3-05, but for the transportation sector instead of all sectors: that California target for 2050 a reduction of GHG emissions from the transportation sector equaling 80 percent less than 1990 levels. Executive order B-16-2012 also indicates that the CARB, the California Energy Commission, the Public Utilities Commission and other relevant agencies are ordered to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve the following:

- By 2015: The State's major metropolitan areas able to accommodate zero-emission vehicles, each with infrastructure plans and streamlined permitting; the State's manufacturing sector expend zero-emission vehicle and component manufacturing; an increase in the private sector's investment in zero-emission vehicle infrastructure; and the State's academic and research institutions contributing to zero-emission vehicle research, innovation and education.

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- By 2020: The State's zero-emission vehicle infrastructure ability to support up to one million vehicles; the costs of zero-emission vehicles competitive with conventional combustion vehicles; zero-emission vehicles accessible to mainstream consumers; widespread use of zero-emission vehicles for public transportation and freight transport; and a decrease in transportation sector GHG emissions as a result of the switch to zero-emission vehicles; electric vehicle charging integrated into the electricity grid.
- By 2025: over 1.5 million zero-emission vehicles on California roads; easy access to zero-emission vehicle infrastructure in California; the zero-emission vehicle industry strong and sustainable part of California's economy; and California's vehicles displace at least 1.5 billion gallons of petroleum fuels per year.

Greenhouse Gas Emissions Performance Standard for Power Plants. On January 25, 2007, the CPUC adopted an interim GHG emissions performance standard. This standard is a facility-based emissions standard requiring all new long-term commitments for baseload generation to serve California consumers with power plants that have emissions no greater than a combined cycle gas turbine plant. The established level is 1,100 pounds of CO₂ per megawatt-hour.

Senate Bill 375. SB 375 was signed into law on October 1, 2008. SB 375 provides emissions-reduction goals around which regions can plan, integrates disjointed planning activities, and provides incentives for local governments and developers to implement "smart growth" planning and development strategies, including reducing the average VMT to reduce commuting distances and reduce criteria and greenhouse gas air pollutant emissions. SB 375 has three major components:

- Using the regional transportation planning process to achieve reductions in GHG emissions consistent with AB 32's goals;
- Offering CEQA incentives to encourage projects that are consistent with a regional plan that achieves GHG emission reductions; and
- Coordinating the regional housing needs allocation process with the regional transportation process while maintaining local authority over land use decisions.

SB 375 requires each Metropolitan Planning Organization (MPO) to include a Sustainable Communities Strategy (SCS) in the regional transportation plan that demonstrates how the region will meet the greenhouse gas emission targets and creates CEQA streamlining incentives for projects that are consistent with the regional SCS. The focus of SB 375 is on placement of new residential projects and coordinated transportation planning.

Renewable Electricity Standards. There have been several renewable electricity senate bills in California. On September 12, 2002, Governor Gray Davis signed SB 1078 requiring California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 changed the due date to 2010 instead of 2017. On November 17, 2008, Governor Arnold Schwarzenegger signed Executive Order S-14-08, which established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Governor Schwarzenegger also directed the CARB (Executive Order S-21-09) to adopt a regulation by July 31, 2010, requiring the state's load serving entities to meet a 33 percent renewable energy target by 2020. The CARB approved the Renewable Electricity Standard on September 23, 2010, by Resolution 10-23. Senate Bill X1-2 (2011) codifies the Renewable Electricity Standard into law.

SmartWay Partners. SmartWay effectively refers to aerodynamic and rolling resistance requirements geared toward reducing fuel consumption. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. CARB's Tractor-Trailer Greenhouse Gas Regulation requires that all 2010 and older model year tractors that pull 53-foot or longer box type trailers must use SmartWay verified low rolling resistance tires beginning January 1, 2013.

The EPA has evaluated the fuel saving benefits of various devices through emissions and fuel economy testing, demonstration projects and technical literature review. As a result, EPA has determined the following types of technologies provide fuel saving and/or emission reducing benefits when used properly in their designed applications:

- **Idle Reduction Technologies** allow engine operators to refrain from long-duration idling of the main propulsion engine by using an alternative technology. An idle reduction technology is generally defined as the installation of a technology or device that:
 - Reduces unnecessary main engine idling of the vehicle or equipment; and/or
 - Is designed to provide services (e.g., heat, air conditioning, and/or electricity) to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or remains stationary.
- **Aerodynamic Technologies** minimize drag and improve airflow over the entire tractor-trailer vehicle. Aerodynamic technologies include gap fairings that reduce turbulence between the tractor and trailer, side skirts that minimize wind under the trailer, and rear fairings that reduce turbulence and pressure drop at the rear of the trailer.
- **Low Rolling Resistance Tires:** Certain tire models can reduce NO_x emissions and fuel use by 3 percent or more, relative to the best-selling new tires for line haul class 8 tractor trailers. These improvements are achieved under the following conditions:
 - Tires are used on the axle positions stated on the list below.
 - Verified low rolling resistance tires are installed on all of the axle positions of the tractor and trailer.
 - All tires must be properly inflated according to the manufacturer's specifications.
- **Retrofit Technologies:** Diesel retrofit technologies that the EPA has approved or conditionally approved, such as:
 - Diesel Particulate Filter (DPF);
 - CMX Catalyst Muffler;
 - Selective Catalytic Reduction (SCR) System;
 - Diesel Oxidation Catalyst (DOC); and
 - Diesel Oxidation Catalyst (DOC) plus CDTi Closed Crankcase Ventilation (CCV) System.

Within each of these categories, the EPA has verified specific products and continues to evaluate and verify new products. Although the EPA has verified the fuel saving and/or emission reducing benefits of the listed products, it does not endorse the purchase of products or services from any specific vendor.

4.7.2.4 Regional Regulations

Note: the subsection "Scoping Plan" was moved from this section to the California Regulation section following AB 32, because it is not a regional plan but a state plan.

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Southern California Association of Governments (SCAG) Sustainable Communities Strategy (SCS) within Regional Transportation Plan (RTP) demonstrates the region’s ability to attain and exceed the GHG emission reduction targets set by the CARB. The SCS outlines the plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network, which emphasizes system preservation, active transportation, and transportation demand management measures.

The RTP/SCS exceeds its greenhouse gas emission-reduction targets set by the CARB by achieving a 9 percent reduction by 2020 and 16 percent reduction by 2035 compared to the 2005 level on a per capita basis. Table 4.7.C shows the assumptions regarding Moreno Valley that SCAG used in its analysis.

Table 4.7.C: SCAG Assumptions for Moreno Valley

Year	Population	Households	Employment
2008	187,400	51,100	32,300
2020	213,700	60,000	48,000
2035	255,200	72,800	64,400

Source: Southern California Association of Governments 2012 and the *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

The RTP also includes an appendix on the Goods Movement, which provides an overview of the regional goods movement and initiatives to facilitate it. Strategies in the RTP that include the Local Jurisdiction as a responsible party, that could be applicable to the project, and that pertain to air quality or greenhouse gases are shown in Table 4.7.D. Many of the strategies are similar to the project's mitigation measures (see Section 4.7.6.1) and project design features.

Table 4.7.D: Select Regional Transportation Plan Strategies

Strategy	Responsible Party*	Project Consistency
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and electric (and other alternative fuel) vehicle supply equipment in public parking lots.	Local Jurisdictions, COGs, SCAG, CTCs	Consistent with Mitigation Measures 4.3.6.3B (non-diesel yard trucks), 4.3.6.3C (alternative fuel station), and 4.3.6.4A (electric vehicle charging stations).
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions and CTCs	Consistent with Mitigation Measure 4.3.6.4A (bicycle lanes, storage lockers, and pedestrian connections/pathways).
Engage in a strategic planning process to	Local	The project is consistent with City's goal of

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Table 4.7.D: Select Regional Transportation Plan Strategies

Strategy	Responsible Party*	Project Consistency
determine the critical components and implementation steps for identifying and addressing open space resources, including increasing and preserving park space, specifically in park-poor communities.	Jurisdictions and CTCs	conserving open space. As compared to the Moreno Highlands Specific Plan, the proposed project would change the zoning on 910 acres of the CDFW Conservation Buffer Area from residential to open space. In addition, the proposed project preserves the zoning of 74 acres of open space in the southwest corner of the project site for passive open space and recreation uses. Finally, a network of trails has been proposed within the project site to provide public trail access to the Lake Perris Recreational Area and the San Jacinto Wildlife Area.
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other zero emission vehicle options.	Local Jurisdictions and CTCs	Consistent with Mitigation Measure 4.3.6.4A (Riverside County’s Rideshare Program), bicycle lanes, and pedestrian access.
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of transit oriented development/high quality transit areas or for a jurisdiction’s local residents in general who have fare media	Local Jurisdictions	Not applicable. This measure is for areas in transit-oriented development.
Encourage the implementation of a Complete Streets policy that meets the needs of all users of the streets, roads and highways—including bicyclists, children, persons with disabilities, motorists, neighborhood electric vehicle (NEVs) users, movers of commercial goods, pedestrians, users of public transportation and seniors—for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the region.	Local Jurisdictions, COGs, SCAG, CTCs	Although the project is not implementing what is labeled as a “Complete Streets” policy, the project would include bicycle lanes and pedestrian access (Mitigation Measure 4.3.6.4A) and would implement handicapped access pursuant to current regulations.
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	Consistent through Mitigation Measure 4.3.6.4A (Riverside County’s Rideshare Program; designated parking for carpool/van pools).
Develop infrastructure plans and educational programs to promote active transportation options and other alternative fueled vehicles, such as neighborhood electric vehicles, and consider collaboration with local public health departments, walking/biking coalitions, and/or Safe Routes to School initiatives, which may already have components of such educational programs in place.	Local Jurisdictions	Consistent with Mitigation Measures 4.3.6.4A (bicycle lanes, pedestrian access, electric vehicle charging) and 4.3.6.3C (alternative fueling infrastructure).
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions and CTCs	Not applicable. Tenants may choose to implement telecommuting if feasible.

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Table 4.7.D: Select Regional Transportation Plan Strategies

Strategy	Responsible Party*	Project Consistency
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	State, SCAG, Local Jurisdictions	Consistent with Mitigation Measure 4.3.6.3C (alternative fueling station) and Mitigation Measure 4.3.6.4A (electric vehicle charging stations)

* Abbreviations:

SCAG = Southern California Association of Governments

CTCs = county transportation commissions

COGs = subregional councils of governments

Source: Southern California Association of Governments 2012 and the *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015.

SB 375 took effect in 2009 and required regional municipal planning organizations to develop regional land use plans that demonstrate how the regions will achieve compliance with the GHG reduction goals of AB 32. Cities located within these regions are then required, in turn, to update their General Plans in accordance with the regional plans. Non-compliance with SB 375 will result in transportation funds being withheld from the regional and/or local agency. To date, the regional municipal planning organization for Riverside County (the Western Riverside Council of Governments, or WRCOG) has not adopted a regional plan that is in compliance with SB 375.

South Coast Air Quality Management District. In April 2008, the SCAQMD, in order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, convened a “GHG CEQA Significance Threshold Working Group.”¹ The goal of the working group is to develop and reach consensus on an acceptable CEQA significance threshold for GHG emissions that would be utilized on an interim basis until the CARB (or some other State agency) develops statewide guidance on assessing the significance of GHG emissions under CEQA.

Initially, SCAQMD staff presented the working group with a significance threshold that could be applied to various types of projects—residential, non-residential, industrial, etc. However, the threshold is still under development. In December 2008, staff presented the SCAQMD Governing Board with a significance threshold for stationary source projects in which it is the lead agency. This threshold uses a tiered approach to determine a project’s significance, with 10,000 metric tons (mt) of carbon dioxide equivalent (CO₂e) as a screening numerical threshold.

In September 2010, the Working Group released additional revisions, which recommended a project-level efficiency target of 4.8 mt CO₂e per service population (SP) as a 2020 target and 3.0 mt CO₂e, per SP as a 2035 target. The recommended plan-level target for 2020 was 6.6 mt CO₂e and the plan level target for 2035 was 4.1 mt CO₂e. The SCAQMD has not announced when staff is expecting to present a finalized version of these thresholds to the Governing Board.

The SCAQMD has also adopted Rules 2700, 2701, and 2702 to establish a voluntary program to encourage, quantify, and certify voluntary GHG emission reductions in the SCAQMD’s jurisdiction. The CARB adopted a resolution regarding the adoption of GHG accounting protocols that distinguishes between the offset certification programs that were developed for the voluntary market, and the program that must be developed to certify offsets to be used under CARB’s cap-and-trade rule. This resolution withdrew CARB approval of voluntary protocols but would not impact the use of these protocols for voluntary purposes. Protocols in Rules 2701 and 2702 are voluntary protocols, which no longer have CARB’s approval.

¹ For more information see: <http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html>.

4.7.2.5 City of Moreno Valley General Plan Policies

The City adopted its General Plan in 2006. The General Plan does not contain policies directly related to greenhouse gases; however, it does have some air quality¹ policies applicable to the proposed project that are related to reducing greenhouse gases, as shown below:

- Objective 6.6** Promote land use patterns that reduce daily automotive trips and reduce trip distance for work, shopping, school, and recreation.
- Objective 6.7** Reduce mobile and stationary source air pollutant emissions.
- Policy 6.7.1** Cooperate with regional efforts to establish and implement regional air quality strategies and tactics.
- Policy 6.7.2** Encourage the financing and construction of park-and-ride facilities.
- Policy 6.7.3** Encourage express transit service from Moreno Valley to the greater metropolitan areas of Riverside, San Bernardino, Orange and Los Angeles Counties.
- Policy 6.7.6** Require building construction to comply with the energy conservation requirements of Title 24 of the California Administrative Code.

4.7.2.6 City of Moreno Valley Climate Action Strategy

The City of Moreno Valley approved the Energy Efficiency and Climate Action Strategy (Strategy) in October 2012. The Strategy identifies ways that the City can reduce energy and water consumption and greenhouse gas emissions as an organization (its employees and the operation of its facilities) and outlines the actions that the City can encourage and community members can employ to reduce their own energy and water consumption and greenhouse gas emissions. The Strategy contains the following policies to reduce greenhouse gas emissions in 2010 by 15 percent by 2020:

- R2-T1 *Land Use Based Trips and VMT Reduction Policies.* Encourage the development of Transit Priority Projects along High Quality Transit Corridors identified in the SCAG Sustainable Communities Plan, to allow a reduction in vehicle miles traveled.
- R2-T3 *Employment-Based Trip Reductions.* Require a Transportation Demand Management (TDM) program for new development to reduce automobile travel by encouraging ride-sharing, carpooling, and alternative modes of transportation.
- R2-E1 *New Construction Residential Energy Efficiency Requirements.* Require energy efficient design for all new residential buildings to be 10 percent beyond the current Title 24 standards.
- R2-E2 *New Construction Residential Renewable Energy.* Facilitate the use of renewable energy (such as solar [photovoltaic] panels or small wind turbines) for new residential developments. Alternative approach would be the purchase of renewable energy resources off site.
- R2-E5 *New Construction Commercial Energy Efficiency Requirements.* Require energy efficient design for all new commercial buildings to be 10 percent beyond the current Title 24 standards.
- R3-E1 *Energy Efficient Development, and Renewable Energy Deployment Facilitation and Streamlining.* Updating of codes and zoning requirements and guidelines to further implement green building practices. This could include incentives for energy-efficient projects.

¹ Policies 6.7.4 and 6.7.5 are discussed in the Air Quality EIR Section, 4.3.

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- R3-L2 *Heat Island Plan*. Develop measures that address “heat islands.” Potential measures include using strategically placed shade trees, using paving materials with a Solar Reflective Index of at least 29, an open grid pavement system, or covered parking.
- R2-W1 *Water Use Reduction Initiative*. Consider adopting a per capita water use reduction goal which mandates the reduction of water use of 20 percent per capita with requirements applicable to new development and with cooperative support of the water agencies.
- R3-W1 *Water Efficiency Training and Education*. Work with EMWD and local water companies to implement a public information and education program that promotes water conservation.
- R2-S1 *City Diversion Program*. For solid waste, consider a target of increasing the waste diverted from the landfill to a total of 75 percent by 2020.

4.7.3 Methodology

Bearing in mind that CEQA does not require “perfection” but instead “adequacy, completeness, and a good faith effort at full disclosure,” the analysis of project GHG emissions and climate change is based on methodologies and information available at the time this EIR was prepared. Many uncertainties exist regarding the precise relationship between specific levels of GHG emissions and the ultimate impact on global climate. Significant uncertainties also exist regarding the reduction potential of mitigation strategies. Thus, while information is presented below to assist the public and the City’s decision-makers in understanding the project’s potential contribution to global climate change impacts, the information available to the City is not sufficiently detailed to allow a direct comparison between particular project characteristics and particular climate change impacts, nor between any particular proposed mitigation measure and any reduction in climate change impacts.

The recommended approach for GHG analysis included in the California Governor’s Office of Planning and Research (OPR’s) June 2008 release is to: (1) identify and quantify GHG emissions, (2) assess the significance of the impact on climate change, and (3) if significant, identify alternatives and/or mitigation measures to reduce the impact below a level of significance.¹ Neither the CEQA statute nor Guidelines prescribe quantitative thresholds of significance or a particular methodology for performing an impact analysis; as with most environmental topics, significance criteria are left to the judgment and discretion of the lead agency.

The June 2008 OPR guidance provides some additional direction regarding planning documents as follows: “CEQA can be a more effective tool for GHG emissions analysis and mitigation if it is supported and supplemented by sound development policies and practices that will reduce GHG emissions on a broad planning scale and that can provide the basis for a programmatic approach to project-specific CEQA analysis and mitigation. For local government lead agencies, adoption of General Plan policies and certification of General Plan EIRs that analyze broad jurisdiction-wide impacts of GHG emissions can be part of an effective strategy for addressing cumulative impacts and for streamlining later project-specific CEQA reviews.”

Pursuant to SB 97, the OPR is in the process of developing guidelines for analysis of the effects of GHG emissions. As part of this process, the OPR has asked CARB technical staff to recommend statewide interim thresholds of significance for GHGs. The CARB released a preliminary draft staff proposal in October 2008 that included initial suggestions for significance criteria related to industrial, commercial, and residential projects.

In March 2010, *CEQA Guidelines* amendments were adopted and include the following direction regarding determination of significant impacts from GHG emissions (Section 15064.4):

¹ State of California, 2008. Governor’s Office of Planning and Research. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review*. June 19.

- (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
- (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; or
 - (2) Rely on a qualitative analysis or performance based standards.
- (b) A lead agency may consider the following when assessing the significance of impacts from greenhouse gas emissions on the environment:
- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
 - (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
 - (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

CEQA Guidelines Section 15064(b) provides that the “determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data,” and further, states that an “ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting.”

On February 3, 2011 the SCAQMD released the California Emissions Estimator Model (CalEEMod) Emissions Inventory Model. CalEEMod was updated in July 2013, after publication of the Draft EIR; therefore, the emissions were remodeled using the new version for the Final EIR. The latest version of CalEEMod was utilized to calculate GHG emissions from the following source categories: construction, energy, waste, land use change, and water. For a detailed description of the assumptions used to estimate the GHG emissions, refer to the Air Quality, Greenhouse Gas, and Health Risk Assessment Report.

As a result of comments on the Draft EIR, the GHG inventory was revised as follows:

- **Revisions to Construction Assumptions.** Construction related GHG emissions were estimated using the same procedures as for air quality. For a list of the changes to the construction emissions methodology, please refer to Section 4.3.3.1 in the Air Quality Final EIR or the revised Air Quality, Greenhouse Gas, and Health Risk Assessment (2015).
- **Revisions to Operational Mobile Assumptions.** Operational mobile GHG emissions were estimated using the same procedures for the air quality analysis. The new emission factors model

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was used (EMFAC2014). Please refer to Section 4.3.3.2 in the Air Quality Final EIR or the revised Air Quality, Greenhouse Gas, and Health Risk Assessment (2015) for a list of those changes.

- **Addition of Onsite Equipment Emissions.** During operation of the project, there would be on-site equipment operating on the project site. Yard trucks are trucks that are used in moving trailers and containers short distances around the warehouses. Emergency generators would be run for testing purposes. Fuel powered forklifts are assumed for the light industrial uses; however, the warehouse and distribution centers would use electric forklifts, which would not have emissions.
- **Addition of Black Carbon Emissions Estimation.** The analysis in the Draft EIR did not estimate black carbon emissions, which may contribute to climate change. This analysis includes an estimate of black carbon emissions for both construction and operation.
- **New Waste Generation Factors.** The new version of CalEEMod has revised operational waste generation factors, which results in less estimated waste generated during operation and less greenhouse gas emissions.
- **Land Use Change.** In the Draft EIR, the GHG emissions from the land use change (conversion of dry farming to a built up environment), was included as a one-time occurrence in the construction emissions. For the Final EIR, these emissions are operational and occur every year.

4.7.4 Thresholds of Significance

Based on Appendix G of the *CEQA Guidelines*, climate change/greenhouse gas emissions impacts would occur if the proposed project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (i.e., exceeds the SCAQMD's 10,000 mt CO₂e emissions screening threshold of significance); and/or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

Global climate change may result in significant adverse effects to the environment that will be experienced worldwide, with some specific effects observed in California. AB 32 requires statewide GHG emissions reductions to 1990 levels by 2020. Although these statewide reductions are now mandated by law, no generally applicable GHG emission threshold has yet been established.

State CEQA Guidelines Section 15064(b) provides that "...the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data," and further, that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting." The *State CEQA Guidelines* further indicate that even when thresholds are established, they may include "identifiable quantitative, qualitative or performance level of a particular environmental effect" (*State CEQA Guidelines*, Section 15064.7).

Some policymakers and regulators suggest that a zero emissions threshold would be appropriate when evaluating GHGs and their potential effect on climate change. Such a rule appears inconsistent with the State's approach to mitigation of climate change impacts. AB 32 does not prohibit all new GHG emissions; rather, it requires a reduction in statewide emissions to a given level. Thus, AB 32 recognizes that GHG emissions will continue to occur; increases will result from certain activities, but reductions must occur elsewhere.

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Individual projects incrementally contribute toward the potential for global climate change (GCC) on a cumulative basis in concert with all other past, present, and probable future projects. While individual projects are unlikely to measurably affect GCC, each of these projects incrementally contributes toward the potential for GCC on a cumulative basis, in concert with all other past, present, and probable future projects. This analysis examines whether the project's emissions should be considered cumulatively significant.

In order to evaluate the significance of a proposed project's environmental impacts related to GHG emissions, it is necessary to identify quantitative or qualitative thresholds which, if exceeded, would constitute a finding of significance. As previously described, while project-related GHG emissions can be estimated the direct impact of such emissions on climate change and global warming cannot be determined on the basis of available science. There is no evidence at this time that the proposed project would directly affect GCC. The SCAQMD has adopted a quantitative GHG emission significance threshold to assess direct impacts from industrial projects where the SCAQMD is the lead agency. The SCAQMD and other air quality agencies agree that GHG and GCC should be assessed as a potentially significant cumulative impact rather than a project-specific impact.

The following is an excerpt from the SCAQMD (*Draft Guidance Document – Interim CEQA Greenhouse Gas [GHG] Significance Threshold*, October 2008):

“The overarching policy objective with regard to establishing a GHG significance threshold for the purposes of analyzing GHG impacts pursuant to CEQA is to establish a performance standard or target GHG reduction objective that will ultimately contribute to reducing GHG emissions to stabilize climate change. Full implementation of the Governor’s Executive Order S-3-05 would reduce GHG emissions 80 percent below 1990 levels or 90 percent below current levels by 2050. It is anticipated that achieving the Executive Order’s objective would contribute to worldwide efforts to cap GHG concentrations at 450 ppm, thus, stabilizing global climate.”

As described below, staff’s recommended interim GHG significance threshold proposal uses a tiered approach to determining significance. Tier 3, which is expected to be the primary tier by which the AQMD will determine significance for projects where it is the lead agency, uses the Executive Order S-3-05 goal as the basis for deriving the screening level.”

This project utilizes Tier 3 of the SCAQMD's draft threshold and compares the project's uncapped greenhouse gas emissions to the SCAQMD's threshold for industrial projects, 10,000 mt CO₂e per year. Therefore, the threshold used for this project was based on the goal in Executive Order S-3-05. If the project's uncapped emissions are under the threshold, then the project would be in compliance with Executive Order S-3-05.

In September 2013, the SCAQMD adopted two Negative Declarations last year stating that GHG emissions subject to the ARB Cap-and-Trade Program do not count against the 10,000 MT CO₂e significance threshold the SCAQMD applies when acting as a lead agency. In addition, the San Joaquin Valley Air Pollution Control District (SJVAPCD) has recently taken this one issue step further and adopted a policy: “CEQA Determinations of Significance for Projects Subject to ARB’s GHG Cap-and-Trade Regulation.” This policy applies when the SJVAPCD is the lead agency and when it is a responsible agency. In short, the SJVAPCD “has determined that GHG emissions increases that are covered under ARB’s Cap-and-Trade regulation cannot constitute significant increases under CEQA...” The SJVAPCD classifies ARB’s Cap-and-Trade Program as an approved GHG emission reduction plan or GHG mitigation program under CEQA Guidelines Section 15064(h) (3). Here are some other pertinent excerpts from that policy:

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- “Consistent with CCR §15064(h)(3), the District finds that compliance with ARB’s Cap-and-Trade regulation would avoid or substantially lessen the impact of project-specific GHG emissions on global climate change.”
- “The District therefore concludes that GHG emissions increases subject to ARB’s Cap-and-Trade regulation would have a less than significant individual and cumulative impact on global climate change.”
- “[I]t is reasonable to conclude that implementation of the Cap-and-Trade program will and must fully mitigate project-specific GHG emissions for emissions that are covered by the Cap-and-Trade regulation.”
- “[T]he District finds that, through compliance with the Cap-and-Trade regulation, project-specific GHG emissions that are covered by the regulation will be fully mitigated.”

The policy acknowledges that “combustion of fossil fuels including transportation fuels used in California (on and off road including locomotives), not directly covered at large sources, are subject to Cap-and-Trade requirements, with compliance obligations starting in 2015.” As such, the SJVAPCD concludes that GHG emissions associated with vehicle miles traveled (VMT) cannot constitute significant increases under CEQA. This regulatory conclusion is therefore directly applicable to the WLC project because VMT is by far the largest source of project GHG emissions.

In the IPCC Assessment Report (IPCC 2007b, Synthesis Report), the IPCC acknowledges that man-made warming and sea level rise would continue for centuries due to the time scales associated with climate processes and feedback even if GHG concentration were to be stabilized. The IPCC further found that both past and future man-made CO₂ emissions will continue to contribute to warming and sea level rise for more than a millennium, due to the time scales required for the removal of CO₂ from the atmosphere. Furthermore, the IPCC assessment noted that the definition of what is a dangerous man-made interference with the climate system and, consequently, the limits to be set for policy purposes are complex tasks that can only be partially based on science, as such definitions inherently involve normative judgments (IPCC 2007b – Working Group III).

4.7.5 Less than Significant Impacts

Due to the size of the project, all potential impacts related to greenhouse gas emissions are considered to be potentially significant.

4.7.6 Significant Impacts

4.7.6.1 Greenhouse Gas Emissions

Threshold	Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
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Future development that could occur within the proposed project site could generate GHG emissions during both construction and operation activities. The following activities are associated with the proposed project and could directly or indirectly contribute to the generation of GHG emissions:

- **Removal of Vegetation (Land Use Change) and Sequestration:** Carbon sequestration is the process of capture and storage of carbon dioxide; trees, vegetation, and soil store carbon in their tissues and wood. The net removal of vegetation for construction from land use change results in a loss of the carbon sequestration in plants. However, planting additional vegetation (sequestration) would result in additional carbon sequestration and would lower the carbon footprint of the project.

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- **Construction Activities:** During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O.
- **Gas, Electric, and Water Use:** Natural gas use results in the emissions of CH₄ (the major component of natural gas) and CO₂ from the combustion of natural gas. Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. Conveying water to the project and treating wastewater also uses electricity.
- **Solid Waste Disposal:** Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH₄ from the anaerobic decomposition of organic materials. CH₄ is approximately 21 times more potent than CO₂. Landfill CH₄ can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.
- **Motor Vehicle Use:** Transportation associated with the proposed project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.
- **On-site Equipment:** During operation of the project, there would be on-site equipment operating, including yard trucks, emergency generators, and forklifts.

Construction Emissions. The project would emit GHGs mainly from direct sources such as combustion of fuels from worker vehicles and construction equipment, as shown in Table 4.7.E. The GHG emissions are from all phases of construction.

Table 4.7.E: Construction Greenhouse Gas Emissions (without mitigation)

Year	Annual Emissions (mt CO ₂ e)
2015	14,315
2016	14,396
2017	19,052
2018	14,515
2019	25,605
2020	16,655
2021	18,318
2022	15,582
2023	18,028
2024	16,792
2025	18,041
2026	14,491
2027	17,097
2028	15,686
2029	11,789
2030	14,500
Total	264,861
Averaged over 30 years	8,829
Capped: Fuel-Based Emission Sources Averaged over 30 years	8,823

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Table 4.7.E: Construction Greenhouse Gas Emissions (without mitigation)

Year	Annual Emissions (mt CO ₂ e)
Uncapped: Refrigerant Installation and Construction Waste Averaged over 30 years	6

mt CO₂e = metric tons of carbon dioxide equivalents.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

Sources include onsite construction equipment, worker trips, haul trips, vendor trips, refrigerant installation for the air conditioning in the offices, construction waste, and water use.

Operational Emissions, Worst-Case Scenario. Operational or long-term emissions occur over the life of the project. Operational emissions for a worst-case buildout condition are shown in Table 4.7.F. The emissions are presented by greenhouse gas (in tons per year), which was also converted to metric tons of carbon dioxide equivalents (mt CO₂e). The vehicle emissions in the table represent travel within the South Coast Air Basin. The emissions do not take into account mitigation measures to reduce emissions, such as the use of model year 2010 and later medium and heavy-duty trucks on the project site. As shown in the table, the project's uncapped emissions are over the SCAQMD's significance threshold of 10,000 mt CO₂e per year. Therefore, emissions are potentially significant.

The analysis presented in Table 4.7.F also represents a worst-case analysis because the emission factors do not take into account full reductions from regulation or reductions from newer trucks and cars. The emissions are estimated using emission factors from EMFAC2014, CARB's emission factor model, for the year 2012.

Table 4.7.F: Project Operational GHG Emissions (Worst-Case 2012 Analysis at Buildout)

Source	Individual Emissions (tons/year)					Greenhouse Gas Emissions (mt CO ₂ e)
	Carbon Dioxide	Methane	Nitrous Oxide	Hydrofluorocarbons	Black Carbon	
AB 32 Capped Emissions						
Mobile	370,445	9.75	2.18	0.00	37.19	362,507
Other	137,884	8.11	1.16	0.00	2.65	127,503
Total	508,329	17.86	3.34	0.00	39.84	490,010
Uncapped Emissions	9,689	504.08	0.00	0.62	0.00	19,237
Threshold						10,000
Significant?						Yes

Notes:

mt CO₂e = metric tons of carbon dioxide equivalents, which is calculated from the emissions (tons/year) by multiplying by the individual global warming potential (carbon dioxide – 1, methane – 21, nitrous oxide – 310, hydrofluorocarbons – 1500, black carbon 760) and converted to metric tons by multiplying by 0.9072.

The "other" emissions include the non-mobile capped emissions as presented in Table 4.7.G below.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

Operational Emissions, Annual Reasonable Scenario. The emissions presented herein are a reasonable scenario, because unlike the worst-case scenario displayed above, the mobile emissions use emission factors for the actual year assessed. The motor vehicle and truck emissions for Phase 1 (2016 to 2022) use emission factors for the year 2022, whereas motor vehicle and truck emissions for Phase 2 (2023 to buildout, 2031) use emission factors for the year 2035.

CARB has designed a California cap-and-trade program that is enforceable and meets the requirements of AB 32. The program began on January 1, 2012, with an enforceable compliance

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obligation beginning with its 2013 GHG emissions inventory. Some of the project's GHG emissions are subject to the requirements of the AB 32 Cap and Trade Program and will have a GHG allocation based on current GHG emissions levels. The AB32 Cap-and-Trade Program has divided allocations into sectors. The transportation and electricity sectors would be covered by the cap-and-trade program.

Table 4.7.G shows the unmitigated project emissions at buildout by individual GHG (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, and black carbon). Those emissions are converted to mt CO₂e based on the global warming potential of the gas/aerosol. The table also shows the emissions divided by AB 32 capped and uncapped emissions. AB 32 capped emissions are shown for informational purposes, as those emissions are not compared with the SCAQMD's significance threshold. As shown in the table, the uncapped emissions exceed the threshold and are significant.

Table 4.7.G: Project GHG Emissions at Buildout by GHG (Unmitigated)

Source	Emissions (tons per year)					GHG Emissions (mt CO ₂ e)
	Carbon Dioxide	Methane	Nitrous Oxide	HFCs	Black Carbon	
AB 32 Capped Emissions						
Mobile	297,342	1.54	2.17	0.00	0.66	270,846
Electricity	118,844	5.46	1.13	0.00	0.00	108,237
Construction fuel*	8,325	2.12	<0.01	0.00	1.78	8,823
Yard trucks	5,631	0.00	0.00	0.00	0.00	5,108
Electricity-convey water	2,346	0.11	0.02	0.00	0.00	2,136
Natural gas	885	0.02	0.01	0.00	0.02	823
Generator	266	0.01	0.00	0.00	0.50	583
Forklifts	213	0.00	0.00	0.00	0.01	198
Total AB 32 Capped	433,852	9.26	3.33	0.00	2.97	396,754
Significant?	--	--	--	--	--	No
Uncapped Emissions						
Waste	8,539	504.66	0.00	0.00	0.00	17,361
Land use change	1,272	0.00	0.00	0.00	0.00	1,154
Refrigerants	0	0.00	0.00	0.61	0.00	827
Construction*	0	-0.58	0.00	0.01	0.00	6
Sequestration	-122	0.00	0.00	0.00	0.00	-111
Total Uncapped	9,689	504.08	0.00	0.62	0.00	19,237
Threshold	--	--	--	--	--	10,000
Significant impact?	--	--	--	--	--	Yes

mt CO₂e = metric tons of carbon dioxide equivalents which is calculated from the emissions (tons/year) by multiplying by the individual global warming potential (carbon dioxide – 1, methane – 21, nitrous oxide – 310, hydrofluorocarbons [HFC] – 1500, black carbon 760) and converted to metric tons by multiplying by 0.9072. <0.01 = less than 0.01

* Construction emissions are the average over 30 years. Construction uncapped emissions are from refrigerants and construction waste.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

Table 4.7.H shows a summary of AB 32 capped and uncapped project emissions for each year between 2015 and buildout. The emissions do not take into account the project design features or mitigation. As shown in the table, the uncapped emissions in the year 2022 and after are over the SCAQMD's significance threshold of 10,000 mt CO₂e per year. Therefore, emissions are potentially significant.

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Table 4.7.H-a: Project Operational GHG Emissions (Year by Year without Mitigation)

Source	GHG Unmitigated Emissions (mt CO ₂ e/year)									
	2015	2016	2017	2018	2019	2020	2021	2022		
AB 32 Capped Emissions										
Mobile	0	15,982	31,964	53,274	74,584	114,159	153,734	174,629		
Electricity	0	5,598	11,197	18,662	26,126	39,989	54,119	61,183		
Construction fuel	14,306	14,388	19,040	14,503	25,584	16,633	18,307	15,578		
Yard trucks	0	264	528	881	1233	1,887	2,554	2,888		
Electricity to convey water	0	110	221	368	516	789	1,068	1,207		
Natural gas	0	43	85	142	199	304	411	465		
Generator	0	30	60	101	141	216	292	330		
Forklifts	0	10	20	34	48	73	99	112		
Total AB 32 Capped Emissions	14,306	36,425	63,115	87,965	128,431	174,050	230,584	256,392		
Uncapped Emissions										
Waste	0	898	1,796	2,993	4,191	6,414	8,681	9,814		
Land use change	0	60	119	199	279	426	577	652		
Refrigerants	0	43	86	143	200	306	414	467		
Construction refrigerant install and waste*	9	9	11	11	21	22	11	4		
Sequestration	0	-6	-11	-19	-27	-41	-56	-63		
Total Uncapped Emissions	9	1,004	2,001	3,327	4,664	7,127	9,627	10,874		
Threshold	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000		
Significant impact?	No	No	No	No	No	No	No	No	Yes	

Notes:
mt CO₂e = metric tons of carbon dioxide equivalents which is calculated from the emissions (tons/year) by multiplying by the individual global warming potential (carbon dioxide – 1, methane – 21, nitrous oxide – 310, hydrofluorocarbons – 1500, black carbon 760) and converted to metric tons by multiplying by 0.9072.
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015

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Table 4.7.H-b: Project Operational GHG Emissions (Year by Year without Mitigation)

Source	Emissions (mt CO ₂ e/year)									
	2023	2024	2025	2026	2027	2028	2029	2030	Buildout	
AB 32 Capped Emissions										
Mobile	183,616	192,604	205,429	219,972	234,515	249,059	258,591	268,123	270,846	
Electricity	64,116	69,981	76,246	83,364	90,455	97,573	102,239	106,904	108,237	
Construction fuel*	18,019	16,783	18,030	14,480	17,086	15,679	11,782	14,497	8,823	
Yard trucks	3,026	3,303	3,599	3,935	4,269	4,605	4,825	5,046	5,108	
Electricity to convey water	1,265	1,381	1,505	1,645	1,785	1,926	2,018	2,110	2,136	
Natural gas	487	532	580	634	688	742	777	813	823	
Generator	346	377	411	449	488	526	551	576	583	
Forklifts	117	128	139	152	165	178	187	196	198	
Total AB 32 Capped Emissions	270,992	285,089	305,939	324,631	349,451	370,288	380,970	398,265	396,754	
Uncapped Emissions										
Waste	10,284	11,225	12,230	13,371	14,509	15,651	16,399	17,147	17,361	
Land use change	684	746	813	889	964	1040	1,090	1,140	1,154	
Refrigerants	490	535	583	637	691	746	781	817	827	
Construction refrigerant install and waste*	9	10	11	11	11	7	7	2	6	
Sequestration	-66	-72	-78	-85	-93	-100	-105	-110	-111	
Total Uncapped Emissions	11,401	12,444	13,559	14,823	16,082	17,344	18,172	18,996	19,237	
Threshold	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	
Significant impact?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Notes:

mt CO₂e = metric tons of carbon dioxide equivalents which is calculated from the emissions (tons/year) by multiplying by the individual global warming potential (carbon dioxide – 1, methane – 21, nitrous oxide – 310, hydrofluorocarbons – 1500, black carbon 760) and converted to metric tons by multiplying by 0.9072.

* Construction would not occur at buildout; however, according to SCAQMD recommendations, it is included at buildout as the average over 30 years.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

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Compared with emissions as estimated in the DEIR, motor vehicle emissions at buildout were reduced by about 164,000 mt CO₂e/year (435,000 to 271,000) for the following reasons. First, the emission factors used in the revised analysis are from EMFAC2014 instead of EMFAC2007 (as used in the DEIR). Secondly, the unmitigated emissions in the revised analysis include reductions from current regulation; in the DEIR, only the mitigated emissions accounted for regulation. Finally, the total vehicle miles traveled decreased from 1,249,400 miles per day to 1,034,800 miles per day (a reduction of 214,600 miles/day). This decrease reflects more realistic vehicle and truck patterns provided by the revised Traffic Impact Analysis which modeled the expected vehicle trips and volumes from the project instead of a general average of 50 miles per truck trip.

Waste emissions were reduced by approximately 136,000 mt CO₂e/year because the new version of CalEEMod (2013) lowered its waste generation rates for warehouse development.

Use of Cap-and-Trade Program Benefits for Project Impacts. The SCAQMD issued Negative Declarations last year stating that GHG emissions subject to the ARB Cap-and-Trade Program do not count against the 10,000 MT CO₂e significance threshold the SCAQMD applies when acting as a lead agency. In addition, the San Joaquin Valley Air Pollution Control District (SJVAPCD) has recently taken this one issue step further and adopted a policy: “CEQA Determinations of Significance for Projects Subject to ARB’s GHG Cap-and-Trade Regulation.” This policy applies when the SJVAPCD is the lead agency and when it is a responsible agency. In short, the SJVAPCD “has determined that GHG emissions increases that are covered under ARB’s Cap-and-Trade regulation cannot constitute significant increases under CEQA...” The SJVAPCD classifies ARB’s Cap-and-Trade Program as an approved GHG emission reduction plan or GHG mitigation program under CEQA Guidelines Section 15064(h) (3). Here are some other pertinent excerpts from that policy:

- “Consistent with CCR §15064(h)(3), the District finds that compliance with ARB’s Cap-and-Trade regulation would avoid or substantially lessen the impact of project-specific GHG emissions on global climate change.”
- “The District therefore concludes that GHG emissions increases subject to ARB’s Cap-and-Trade regulation would have a less than significant individual and cumulative impact on global climate change.”
- “[I]t is reasonable to conclude that implementation of the Cap-and-Trade program will and must fully mitigate project-specific GHG emissions for emissions that are covered by the Cap-and-Trade regulation.”
- “[T]he District finds that, through compliance with the Cap-and-Trade regulation, project-specific GHG emissions that are covered by the regulation will be fully mitigated.”

The policy acknowledges that “combustion of fossil fuels including transportation fuels used in California (on and off road including locomotives), not directly covered at large sources, are subject to Cap-and-Trade requirements, with compliance obligations starting in 2015.” As such, the SJVAPCD concludes that GHG emissions associated with vehicle miles traveled (VMT) cannot constitute significant increases under CEQA. This regulatory conclusion is therefore directly applicable to the WLC project because VMT is by far the largest source of project GHG emissions.

Specific Plan Design Features. The WLCSP incorporates site and building designs that emphasize conservation of water and energy, which in turn help reduce greenhouse gas emissions (WLCSP September 2014, Section 1.3.2, Green Building-Sustainable Development). Table 4.7.I evaluates to what degree various design features of the proposed project will reduce potential GHG emissions.

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Mitigation Measures. Table 4.7.I evaluates to what degree the mitigation measures recommended in other impact sections will reduce potential GHG emissions. The only mitigation measure that is required is the following.

4.7.6.1A The project shall implement the following requirements to reduce solid waste and greenhouse gas emissions from construction and operation of project development:

- a) Prior to January 1, 2020, divert a minimum of 50 percent of landfill waste generated by operation of the project. After January 1, 2020, development shall divert a minimum of 75 percent of landfill waste. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis.
- b) Prior to January 1, 2020, recycle and/or salvage at least 50 percent of non-hazardous construction and demolition debris. After January 1, 2020, recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris. In January of each calendar year after project approval the developer and/or Property Owners Association shall certify the percentage of landfill waste diverted on an annual basis.

Develop and implement a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or co-mingled. Calculations can be done by weight or volume, but must be consistent throughout.

- c) The applicant shall submit a Recyclables Collection and Loading Area Plan for construction related materials prior to issuance of a building permit with the Building Division and for operational aspects of the project prior to the issuance of the occupancy permit to the Public Works Department. The plan shall conform to the Riverside County Waste Management Department's Design Guidelines for Recyclable Collection and Loading Areas.
- d) Prior to issuance of certificate of occupancy, the recyclables collection and loading area shall be constructed in compliance with the Recyclables Collection and Loading Area plan.
- e) Prior to issuance of certificate of occupancy, documentation shall be provided to the City confirming that recycling is available for each building.
- f) Within six months after occupancy of a building, the City shall confirm that all tenants have recycling procedures set in place to recycle all items that are recyclable, including but not limited to paper, cardboard, glass, plastics, and metals.
- g) The property owner shall advise all tenants of the availability of community recycling and composting services.
- h) Existing onsite street material shall be recycled for new project streets to the extent feasible.

Level of Impact After Mitigation. Less than significant (original DEIR conclusion was significant).

Figure 4.7.1 displays the unmitigated and mitigated uncapped GHG emissions. As shown in the figure, the mitigated uncapped emissions are less than the significance threshold and are less than significant.

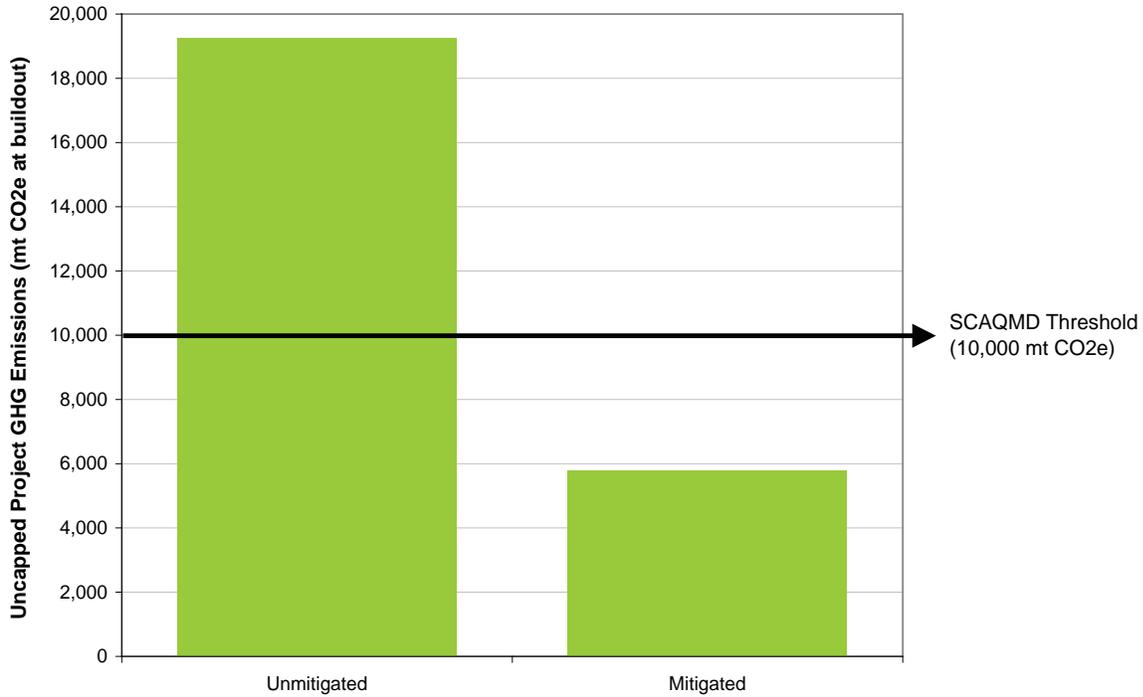


Figure 4.7.1: Uncapped Project GHG Emissions at Buildout

Table 4.7.J shows the GHG emissions and mitigation reductions after implementation of mitigation at buildout only. Table 4.7.K shows the mitigated GHG emissions through construction of the project to buildout.

AB 32 capped emissions are shown for informational purposes, as those emissions are not compared with the SCAQMD's significance threshold. The tables indicate that after implementation of **Mitigation Measure 4.7.6.1A**, the uncapped emissions would not exceed the significance threshold. GHG emissions are less than significant after mitigation.

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Table 4.7.I: Greenhouse Gas Emissions Reduction Analysis

Category	Operational Mitigation Measure or Project Design Feature ¹	Calculation Method and Reductions
Construction Fuel	Mitigation Measure 4.3.6.2A would require that construction equipment be Tier 4.	This reduction was estimated in CalEEMod. Tier 4 construction equipment would have fewer PM2.5 emissions, and therefore black carbon emissions.
Construction Waste	Regulation in the California Green Building Standards require that projects divert (reduce or recycle) at least 50 percent of waste.	This reduction was estimated using the U.S. EPA's Waste Reduction Model (WARM) version 13.
Vehicles: Local	<i>Project Design Feature:</i> Local bus service to the area is provided by the Riverside Transit Agency. Local bus routes would typically be extended into the project area when adequate demand is generated from this employment center. Future bus routes could circulate on available looped routes with adequate right-of-way along the major arterial roadways of Redlands Boulevard, Theodore Street, and Alessandro Boulevard. Likewise, the industrial collector roadways provide access to locations nearest building front entrances. Due to building scale, bus stops may be spread out by grouped entrances or centralized gateway drive areas as compared to individual business entries.	The California Air Pollution Control Officer's Association (CAPCOA) report's reduction measure TRT-1 indicates a 5.2 percent reduction in commute vehicle miles traveled for low-density suburbs for inclusion of a commute trip reduction program. However, this reduction is not used in this analysis.
	Mitigation Measure 4.3.6.4A: Class II bike lanes.	The trip generation rates for which the unmitigated emissions were based are not necessarily based on development with pedestrian connections. Therefore, CalEEMod includes pedestrian connections as part of its mitigation module.
	Mitigation Measure 4.3.6.4A: Participate in Riverside County's rideshare program	In the Draft EIR, the measures shown to the left were estimated to reduce local vehicle emissions by 3 percent. However, with the revised methods for estimating the motor vehicle and truck emissions (calculations are now based on more realistic trip lengths), this reduction would be more difficult to quantify. Therefore, no reductions are taken for these measures in order to provide a conservative analysis.
	Mitigation Measure 4.3.6.4A: Lockers for employees.	
	Mitigation Measure 4.3.6.4A: Bicycle storage and changing rooms	
	<i>Project Design Features:</i> The project would have pedestrian circulation (, sidewalks, and a multiuse trail.	
	Mitigation Measure 4.3.6.4A: Safe pedestrian connections	
	Mitigation Measure 4.3.6.4A: Parking for fuel-efficient vehicles	
Long haul trucks	Mitigation Measure 4.3.6.3B: Require model year 2010 medium-heavy duty and heavy-heavy duty trucks or later.	This was implemented by changing the emission factors for medium-heavy duty and heavy-heavy duty trucks from the CalEEMod default to the EMFAC2014 for year 2010 and after.
Vehicles and Trucks	<i>Pavley-I Regulation:</i> A clean-car standard to reduce greenhouse gas emissions from new passenger vehicles (light duty automobiles and medium duty vehicles) from 2009 through 2016. <i>Low Carbon Fuel Standard:</i> A fuel standard that requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020.	EMFAC2014 provides emission factors for carbon dioxide that include these regulations. Therefore, both the unmitigated and mitigated emissions account for these regulations.

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Table 4.7.I: Greenhouse Gas Emissions Reduction Analysis

Category	Operational Mitigation Measure or Project Design Feature ¹	Calculation Method and Reductions
Electricity and Natural Gas: Title 24	Mitigation Measures 4.16.4.6.1A and 4.16.4.6.1B would reduce electricity related emissions. In addition, the project would require LEED certification for buildings and would require buildings to exceed Title 24 (2008 version) by 10 percent or comply with the current version in place.	This measure was applied in CalEEMod through its mitigation measure module (10 percent beyond Title 24 checkbox).
Electricity, Lighting	Mitigation Measures 4.16.4.6.1B (lighting efficiency) and 4.16.4.6.1C (Title 24) would reduce electricity from lighting.	These measures are accounted for in CalEEMod by using its mitigation measure module, "Install High Efficiency Lighting," with a reduction of 10 percent.
Solar	Mitigation Measure 4.16.4.6.1C requires that the project install solar panels.	The estimated electricity generation from onsite solar is 19,739 MWh per year, which is 5.2 percent of the electricity demand at buildout (376,426 MWh). Therefore, 5.2 percent of the unmitigated GHG emissions are reduced by solar generation.
Water	Mitigation Measure 4.16.1.6.1A would reduce outdoor water usage	CalEEMod mitigation for water-efficient irrigation systems (6.1% reduction, CalEEMod default)
	Mitigation Measure 4.16.1.6.1B would reduce interior water usage, including low flow fittings, fixtures and equipment.	CalEEMod mitigation for: - low-flow toilet (20% reduction in flow, CalEEMod default) - low flow bathroom faucet (32% reduction in flow, CalEEMod default) - low-flow kitchen faucet (18% reduction in flow, CalEEMod default) - low-flow shower (20% reduction in flow, CalEEMod default)
	Mitigation Measure 4.16.1.6.1C would allow reclaimed water to be used for irrigation.	No reductions are taken for the potential use of reclaimed water.
Waste	Mitigation Measure 4.7.6.1A: Recycling and composting availability and reduce operational waste by at least 25 percent before 2020 and 75 percent after.	The project would commit to reducing operational waste by 25 percent prior 2020 and 75 percent after; therefore, a percent reduction is applied.
	<i>Project Design Feature:</i> Specific Plan (Section 5.1.6) requires that all development within the project provide enclosures or compactors for trash and recyclable materials.	

¹ Project design features are from the Project Description, mitigation measures are shown in Section 1.0, Table 1.B. Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015

Table 4.7.J: GHG Reductions at Buildout

Type of Emissions	Source	GHG Emissions (mt CO ₂ e) at Buildout		
		Unmitigated	Reductions from Mitigation	With Reductions (Mitigated)
AB 32 Capped Emissions	Mobile	270,846	-466	270,380
	Electricity	108,237	-9,131	99,106
	Construction fuel*	8,823	-1,072	7,751
	Yard trucks	5,108	0	5,108
	Electricity to convey water	2,136	-207	1,929
	Natural Gas	823	-80	743
	Generator	583	-298	285
	Forklifts	198	0	198
	Solar (electricity)	0	-5,676	-5,676
	Total	396,754	-16,930	379,824
	Significant?	No	—	—
Uncapped Emissions	Waste	17,361	-13,021	4,340
	Land use change	1,154	0	1,154
	Refrigerants	827	0	827
	Construction*	6	-441	-435
	Sequestration	-111	0	-111
	Total	19,237	-13,462	5,775
	Threshold	10,000	—	10,000
	Significant?	Yes	—	No

Notes:

mt CO₂e = metric tons of carbon dioxide equivalents which is calculated from the emissions (tons/year) by multiplying by the individual global warming potential (carbon dioxide – 1, methane – 21, nitrous oxide – 310, hydrofluorocarbons – 1500, black carbon 760) and converted to metric tons by multiplying by 0.9072.

* Construction would not occur at buildout; however, according to SC/AQMD recommendations, it is included as the average over 30 years. Construction uncapped emissions include emissions from refrigerant installation and construction waste.

For information on the regulation and mitigation calculations, please refer to Table 4.7.I.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

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Table 4.7.K-a: Project Operational GHG Emissions (Year by Year with Mitigation)

Source	GHG Mitigated Emissions (mt CO ₂ e/year)									
	2015	2016	2017	2018	2019	2020	2021	2022		
AB 32 Capped Emissions										
Mobile	0	15,596	31,193	51,988	72,783	111,403	150,023	170,413		
Electricity	0	5,126	10,252	17,087	23,922	36,616	49,553	56,022		
Construction fuel*	12,267	12,227	16,203	12,343	22,003	14,126	15,647	13,279		
Yard trucks	0	264	528	881	1233	1,887	2,554	2,888		
Electricity to convey water	0	100	200	333	466	713	965	1,090		
Natural gas	0	38	77	128	179	274	371	420		
Generator	0	15	30	49	69	105	143	161		
Forklifts	0	10	20	34	48	73	99	112		
Solar (electricity)	0	-294	-587	-979	-1,370	-2,097	-2,838	-3,208		
Total AB 32 Capped Emissions	12,267	33,082	57,916	81,864	119,333	163,100	216,517	241,177		
Uncapped Emissions										
Waste	0	673	1,347	2,245	3,143	1,603	2,170	2,453		
Land use change	0	60	119	199	279	426	577	652		
Refrigerants	0	43	86	143	200	306	414	467		
Construction refrigerants and waste*	-675	-675	-900	-900	-1,671	-1,704	-852	-354		
Sequestration	0	-6	-11	-19	-27	-41	-56	-63		
Total Uncapped Emissions	-675	95	641	1,668	1,924	590	2,253	3,155		
Threshold	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000		
Significant impact?	No	No	No	No	No	No	No	No		

mt CO₂e = metric tons of carbon dioxide equivalents, which is calculated from the emissions (tons/year) by multiplying by the individual global warming potential (carbon dioxide – 1, methane – 21, nitrous oxide – 310, hydrofluorocarbons – 1500, black carbon 760) and converted to metric tons by multiplying by 0.9072.

* Estimated construction emissions are included prior to buildout; at buildout, the total construction averaged over 30 years is shown.
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, 2015

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Table 4.7.K-b: Project Operational GHG Emissions (Year by Year with Mitigation)

Source	GHG Mitigated Emissions (mt CO ₂ e/year)								
	2023	2023	2023	2023	2023	2023			
AB 32 Capped Emissions									
Mobile	179,751	189,088	202,413	217,523	232,633	247,743	257,647	267,550	270,380
Electricity	58,707	64,077	69,814	76,331	82,824	89,342	93,614	97,885	99,106
Construction fuel*	15,497	14,405	15,580	12,320	16,251	14,981	11,396	14,006	7,751
Yard trucks	3,026	3,303	3,599	3,935	4,269	4,605	4,825	5,046	5,108
Electricity to convey water	1,143	1,247	1,359	1,486	1,612	1,739	1,822	1,905	1,929
Natural gas	440	480	523	572	621	669	701	733	743
Generator	169	184	201	220	238	257	269	282	285
Forklifts	117	128	139	152	165	178	187	196	198
Solar	-3,362	-3,670	-3,998	-4,371	-4,743	-5,117	-5,361	-5,606	-5,676
Total AB 32 Capped Emissions	255,488	269,242	289,630	308,168	333,870	354,397	365,100	381,997	379,824
Uncapped Emissions									
Waste	2,571	2,806	3,057	3,343	3,627	3,912	4,099	4,287	4,340
Land use change	684	746	813	889	964	1,040	1,090	1,140	1,154
Refrigerants	490	535	583	637	691	746	781	817	827
Construction refrigerants and waste*	27-707	29-755	33-858	33-855	33-858	24-562	24-562	6-161	47-435
Sequestration	-66	-72	-78	-85	-93	-100	-105	-110	-111
Total Uncapped Emissions	2,972	3,260	3,517	3,929	4,331	5,036	5,303	5,973	5,775
Threshold	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000

mt CO₂e = metric tons of carbon dioxide equivalents, which is calculated from the emissions (tons/year) by multiplying by the individual global warming potential (carbon dioxide – 1, methane – 21, nitrous oxide – 310, hydrofluorocarbons – 1500, black carbon 760) and converted to metric tons by multiplying by 0.9072.

* Estimated construction emissions are included prior to buildout; at buildout, the total construction averaged over 30 years is shown.

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015

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4.7.6.2 Greenhouse Gas Plan, Policy, Regulation Consistency

Threshold	Would the proposed project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?
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This impact assesses whether the project would conflict with any applicable plans, policies, or regulations, as discussed below.

Federal and State Reduction Strategies. Table 4.7.L evaluates the consistency of the proposed project with the various Federal and State energy conservation and other regulations related to GHG emissions.

Table 4.7.L: Project Compliance with Federal/State Greenhouse Gas Reduction Strategies

Strategy	Project Compliance
Mandatory Codes	
California Green Building Code. The Cal Green Code prescribes a wide array of measures that would directly and indirectly result in reduction of GHG emissions from the Business as Usual Scenario (California Building Code). The mandatory measures that are applicable to nonresidential projects include site selection, energy efficiency, water efficiency, materials conservation and resource efficiency, and environmental quality measures.	Compliant. The project will be required to adhere to the non-residential mandatory measures as required by the Cal Green Code.
Energy Efficiency Measures	
Energy Efficiency. Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).	Compliant with Mitigation Incorporated. The proposed project will comply with current California Building Code (CBC) requirements for building construction, including the Title 24 energy conservation standards, which will help reduce GHG emissions. In addition, the project will include various energy-efficient building design features and mitigation (Mitigation Measures 4.16.4.6.1A, B, and C) to help further reduce GHG emissions.
Renewables Portfolio Standard. Achieve a 33 percent renewable energy mix statewide. This means that 33 percent of the electricity sold in California must be generated by renewable energy (solar, wind, etc.).	Not applicable. The project is not part of the State's power generation grid, but would install solar photovoltaic panels on project roofs pursuant to Mitigation Measure 4.16.4.6.1C . The solar would reduce the project's electricity related emissions by approximately 5.2 percent. In addition, Moreno Valley Electric Utility purchases its power from Southern California Edison, which is subject to the Renewable Portfolio Standard.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Compliant. The proposed project will comply with current CBC requirements for building construction, including the Title 24 energy conservation standards.

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Table 4.7.L: Project Compliance with Federal/State Greenhouse Gas Reduction Strategies

Strategy	Project Compliance
Water Conservation and Efficiency Measures	
<p>Water Use Efficiency. Continue efficiency programs and use cleaner energy sources to move and treat water. Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions.</p>	<p>Compliant with Mitigation Incorporated. The Specific Plan outlines a number of water conservation measures, and Mitigation Measures 4.16.1.6.1A through 4.16.1.6.1C will help reduce potential water use even further.</p>
Solid Waste Reduction Measures	
<p>Increase Waste Diversion, Composting, and Commercial Recycling, and Move Toward Zero-Waste. Increase waste diversion from landfills beyond the 50 percent mandate to provide for additional recovery of recyclable materials. Composting and commercial recycling could have substantial GHG reduction benefits. In the long term, zero-waste policies that would require manufacturers to design products to be fully recyclable may be necessary.</p>	<p>Compliant with Mitigation Incorporated. Data available from the California Integrated Waste Management Board (CIWMB) indicate that the City of Moreno Valley has not achieved the 50 percent diversion rate. The project will comply with Mitigation Measure 4.7.5.1A to help increase solid waste diversion, composting, and recycling. The measure would also have a goal to reduce waste by 75 percent by 2020.</p>
Transportation and Motor Vehicle Measures	
<p>Vehicle Climate Change Standards. AB 1493 (Pavley) required the State to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles and light-duty trucks. Regulations were adopted by the CARB in September 2004.</p>	<p>Compliant. The project does not involve the manufacture of vehicles. However, vehicles that are purchased and used within the project site would comply with any vehicle and fuel standards that the CARB adopts or has adopted. In addition, the project would require medium-heavy and heavy-heavy duty trucks be 2010 or newer (Mitigation Measure 4.3.6.3B).</p>
<p>Light-Duty Vehicle Efficiency Measures. Implement additional measures that could reduce light-duty vehicle GHG emissions. For example, measures to ensure that tires are properly inflated can both reduce GHG emissions and improve fuel efficiency.</p>	
<p>Adopt Heavy- and Medium-Duty Fuel and Engine Efficiency Measures. Regulations to require retrofits to improve the fuel efficiency of heavy-duty trucks that could include devices that reduce aerodynamic drag and rolling resistance. This measure could also include hybridization of and increased engine efficiency of vehicles.</p>	
<p>Low Carbon Fuel Standard. The CARB identified this measure as a Discrete Early Action Measure. This measure would reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.</p>	

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Table 4.7.L: Project Compliance with Federal/State Greenhouse Gas Reduction Strategies

Strategy	Project Compliance
<p>Regional Transportation-Related Greenhouse Gas Targets. Develop regional GHG emissions reduction targets for passenger vehicles. Local governments will play a significant role in the regional planning process to reach passenger vehicle GHG emissions reduction targets. Local governments have the ability to directly influence both the siting and design of new residential and commercial developments in a way that reduces GHGs associated with vehicle travel.</p>	<p>Compliant. Specific regional emission targets for transportation emissions do not directly apply to this project; regional GHG reduction target development is outside the scope of this project. The project will comply with any plans developed by the City.</p>
<p>Measures to Reduce High Global Warming Potential (GWP) Gases. The CARB has identified Discrete Early Action measures to reduce GHG emissions from the refrigerants used in car air conditioners, semiconductor manufacturing, and consumer products. The CARB has also identified potential reduction opportunities for future commercial and industrial refrigeration, changing the refrigerants used in auto air conditioning systems, and ensuring that existing car air conditioning systems do not leak.</p>	<p>Compliant. New products used or serviced on the project site (after implementation of the reduction of GHG gases) would comply with future CARB rules and regulations.</p>

AB = Assembly Bill CARB = California Air Resources Board GHG = greenhouse gas
Source: based on analysis in the *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

With implementation of applicable strategies/measures project design features, and mitigation measures, the project’s contribution to cumulative GHG emissions would be reduced. In order to ensure that the proposed project complies with and would not conflict with or impede the implementation of reduction goals identified in AB 32, the Mitigation Measures listed in the above table shall be implemented.

CARB Scoping Plan. AB 32 focuses on reducing GHG emissions (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, the CARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which contains a variety of strategies to reduce the State’s emissions. The First Update to the Scoping Plan was approved in 2014. The project will comply with existing State and Federal regulations regarding the energy efficiency of buildings, appliances, and lighting. The warehouse buildings will be built in compliance with the California Building Code to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices. In addition, **Mitigation Measure 4.16.4.6.1A** states the project will exceed the Title 24 energy conservation standards (2008 version) by 10 percent or comply with the current version. As shown in Table 4.7.M, the strategies are either consistent with or not applicable to the project; therefore, the project does not conflict with the Scoping Plan.

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Table 4.7.M: Analysis of Scoping Plan Reduction Measures

Scoping Plan Reduction Measure	Consistency Analysis
<p>1. <i>California Cap-and-Trade Program Linked to Western Climate Initiative.</i> Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.</p>	<p>Not Applicable. This cap-and-trade system covers products or services (such as electricity) and the cost of the cap-and-trade system would be transferred to the consumers. Large industrial uses are the most likely source of participants for this program, and it is not likely individual logistics warehousing will be an active participant in this program. Under AB 32, emissions from natural gas use, transportation fuel use, and electricity generation are covered under the cap-and-trade program and subject to the program's emission reduction requirements.</p>
<p>2. <i>California Light-Duty Vehicle Greenhouse Gas Standards.</i> Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.</p>	<p>Applicable. This is a statewide measure that cannot be implemented by an individual project applicant or lead agency. When this measure is initiated, the standards would be applicable to the light-duty vehicles that would access the project site.</p>
<p>3. <i>Energy Efficiency.</i> Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.</p>	<p>Applicable. This is a measure for the state to increase its energy efficiency standards. However, the project will increase its energy efficiency through existing regulation and project design by implementing current Title 24 energy standards and green building characteristics. In addition, Mitigation Measures 4.16.4.6.1A and B would increase energy efficiency and Mitigation Measures 4.16.4.6.1C would require exceeding Title 24 (2008 version) by 10 percent or comply with the version in place at the time.</p>
<p>4. <i>Renewable Portfolio Standard.</i> Achieve 33 percent renewable energy mix statewide. Renewable energy sources include (but are not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.</p>	<p>Partially Applicable. This is a measure applicable to the utility provider for the project. However, the project would provide on-site solar (Mitigation Measure 4.16.4.6.1C).</p>
<p>5. <i>Low Carbon Fuel Standard.</i> Develop and adopt the Low Carbon Fuel Standard.</p>	<p>Applicable. This is a statewide measure that cannot be implemented by an individual project applicant or lead agency. However, when this measure is initiated, the standard would be applicable to the fuel used by vehicles that would access the project site.</p>
<p>6. <i>Regional Transportation-Related Greenhouse Gas Targets.</i> Develop regional greenhouse gas emissions reduction targets for passenger vehicles. This measure refers to SB 375.</p>	<p>Applicable. The project is not directly related to developing greenhouse gas emission reduction targets. However, this project will improve the jobs/ratio for the City and thereby help reduce commuter-related emissions. For a discussion of the Regional Transportation Plan and the Sustainable Communities Strategy, refer to Table 4.7.D above.</p>
<p>7. <i>Vehicle Efficiency Measures.</i> Implement light-duty vehicle efficiency measures.</p>	<p>Applicable. When this measure is initiated, the standards would be applicable to the light-duty vehicles that would access the project site.</p>

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Table 4.7.M: Analysis of Scoping Plan Reduction Measures

Scoping Plan Reduction Measure	Consistency Analysis
8. <i>Goods Movement.</i> Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	Not Applicable. The project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation. However, the project is related to goods movement and provides logistics warehousing away from port areas.
9. Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	Applicable. This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. Pursuant to Mitigation Measure 4.16.4.6.1C , the project will be incorporating onsite solar panels.
10. Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	Applicable. This is a statewide measure that cannot be implemented by an individual project applicant or lead agency. However, when this measure is initiated, the standards would be applicable to the vehicles that access the project site. In addition, Mitigation Measure 4.3.6.3B requires that trucks be model year 2010 or newer.
11. <i>Industrial Emissions.</i> Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	Not Applicable. This measure would apply to the direct greenhouse gas emissions at major industrial facilities emitting more than 0.5 million mt CO ₂ e (500,000 mt CO ₂ e) per year. It is not anticipated that the project would emit more than 500,000 mt CO ₂ e per year; however, the project is not considered a single facility but would consist of multiple warehouse buildings. The project is a "project" under CEQA but not one facility, which is why a programmatic EIR is being prepared. This measure would be applicable to power plants, refineries, cement plants, and other related sources. In addition, most emissions from the project are indirect since the majority of the emissions are from trucks and motor vehicles.
12. High Speed Rail. Support implementation of a high-speed rail system.	Not Applicable. This is a statewide measure that cannot be implemented by a project applicant or lead agency.
13. Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Applicable. The State now requires development to use various green building practices. The project will implement green building strategies through existing regulation. In addition, Mitigation Measures 4.16.4.6.1A and B would increase energy efficiency. Mitigation Measure 4.16.4.6.1C would require that the project exceed Title 24 (2008 version) by 10 percent or comply with the current version.
14. High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	Applicable. When this measure is initiated, it would be applicable to the high global warming potential gases that would be used by the project (such as in air conditioning).
15. Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	Not Applicable. The project would not contain a landfill. The State wishes to help increase waste diversion, and the project would reduce waste with implementation of mitigation.

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Table 4.7.M: Analysis of Scoping Plan Reduction Measures

Scoping Plan Reduction Measure	Consistency Analysis
16. <i>Sustainable Forests.</i> Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Not Applicable. No forested lands exist on site.
17. <i>Water.</i> Continue efficiency programs and use cleaner energy sources to move and treat water.	Not Applicable. This is a measure for State and local agencies. However, the project would reduce water through project design (i.e., implementation of the Specific Plan) and Mitigation Measures 4.16.6.1A through 4.16.6.1C.
18. <i>Agriculture.</i> In the near term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	Not Applicable. No grazing, feedlot, or other agricultural activities that generate manure occur on site or are proposed to be implemented by the project.

Sources: California Air Resources Board 2008, *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

City General Plan Policies. The project must also be evaluated against the City’s General Plan policies that relate to greenhouse gas emissions, as shown in Table 4.7.N. This analysis shows that the project is consistent with the applicable General Plan objectives and policies, or the particular objective or policy is not applicable to the proposed WLC project.

Table 4.7.N: Consistency with City General Plan Air Quality Policies

Objective or Policy	Project Consistency
Objective 6.6. Promote land use patterns that reduce daily automotive trips and reduce trip distance for work, shopping, school, and recreation.	Consistent. The project is providing employment opportunities to Moreno Valley and the surrounding area.
Policy 6.6.1. Provide sites for new neighborhood commercial facilities within close proximity to the residential areas they serve.	Not Applicable. The project does not propose the development of neighborhood commercial facilities or residential dwellings.
Policy 6.6.2. Provide multifamily residential development sites in close proximity to neighborhood commercial centers in order to encourage pedestrian instead of vehicular travel.	Not Applicable. The project is industrial and does not propose the development of residential uses.
Policy 6.6.3. Locate neighborhood parks in close proximity to the appropriate concentration of residents in order to encourage pedestrian and bicycle travel to local recreation areas.	Not Applicable. The project is industrial and does not propose the development of residential uses.
Objective 6.7. Reduce mobile and stationary source air pollutant emissions.	Consistent. The project would be implementing feasible Mitigation Measures to reduce mobile and stationary emissions (Mitigation Measures 4.3.6.3B, 4.3.6.3C, 4.3.6.3D, and 4.3.6.4A).
Policy 6.7.1. Cooperate with regional efforts to establish and implement regional air quality strategies and tactics.	Not Applicable. This measure is beyond the scope of the project; the City will continue to work with the SCAQMD in regional planning efforts.
Policy 6.7.2. Encourage the financing and construction of park-and-ride facilities.	Not Applicable. The project consists of industrial uses; a park and ride on the project would not be feasible.
Policy 6.7.3. Encourage express transit service from Moreno Valley to the greater metropolitan areas of Riverside, San Bernardino, Orange and Los Angeles Counties.	Not Applicable. No express mass transit facilities are designated on the project site or planned on the project site; therefore, this measure is beyond the scope of the project.

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Table 4.7.N: Consistency with City General Plan Air Quality Policies

Objective or Policy	Project Consistency
Policy 6.7.6. Require building construction to comply with the energy conservation requirements of Title 24 of the California Administrative Code.	Consistent. The project will comply with Title 24 requirements.

Policies 6.7.4 and 6.7.5 are discussed in the air quality EIR section, Section 4.3).

Source of objective and policy: Moreno Valley General Plan (2006).

Source of project consistency: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015*

City Climate Action Strategy. Finally, Table 4.7.O evaluates the consistency of the proposed project with the policies of the City’s Climate Action Strategy approved in October 2012. As shown below and in Appendix D of the revised Air Quality, Greenhouse Gas, and Health Risk Assessment, the project is consistent with the requirements of the Strategy for non-residential development with implementation of project design features and mitigation measures.

Table 4.7.O: Consistency with City Climate Action Strategy

Strategy Items	Project Consistency
R2-T1: Land Use Based Trips and VMT Reduction Policies. Encourage the development of Transit Priority Projects along High Quality Transit Corridors identified in the SCAG Sustainable Communities Plan, to allow a reduction in vehicle miles traveled.	Not Applicable. A Transit Priority Project is one that has at least 50 percent residential use based on area, at least 20 units per acre and is within a ½ mile of a major transit stop or High Quality Transit Corridor. A High Quality Transit Corridor is defined as one with 15-minute frequencies during peak commute hours. The proposed project does not include a residential component and is not along a High Quality Transit Corridor nor are there any High Quality Transit Corridors or major transit stops in the vicinity of the project area. As a result, the strategy is not applicable.
R2-T3: Employment-Based Trip Reductions. Require a Transportation Demand Management (TDM) program for new development to reduce automobile travel by encouraging ride-sharing, carpooling, and alternative modes of transportation.	Consistent with implementation of Mitigation Measure 4.3.6.4A.
R2-E1: New Construction Residential Energy Efficiency Requirements. Require energy efficient design for all new residential buildings to be 10 percent beyond the current Title 24 standards.	Not Applicable. This measure applies to residential projects.
R2-E2: New Construction Residential Renewable Energy. Facilitate the use of renewable energy (such as solar (photovoltaic) panels or small wind turbines) for new residential developments. Alternative approach would be the purchase of renewable energy resources offsite.	Not Applicable. This measure applies to residential projects.
R2-E5: New Construction Commercial Energy Efficiency Requirements. Require energy efficient design for all new commercial buildings to be 10% beyond the current Title 24 standards.	Consistent with Mitigation Measure 4.16.4.6.1C.
R3-E1: Energy Efficient Development, and Renewable Energy Deployment Facilitation and Streamlining. Updating of codes and zoning requirements and guidelines to further implement green building practices. This could include incentives for energy efficient projects.	Not Applicable. This refers to updating building and zoning codes and does not apply to this warehousing development plan.

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Table 4.7.O: Consistency with City Climate Action Strategy

Strategy Items	Project Consistency
<p>R3-L2: Heat Island Plan. Develop measures that address “heat islands.” Potential measures include using strategically placed shade trees, using paving materials with a Solar Reflective Index of at least 29, an open grid pavement system, or covered parking.</p>	<p>Consistent. The Specific Plan indicates that vehicle parking areas are to be landscaped to provide a shade canopy (50 percent coverage at maturity).</p>
<p>R2-W1: Water Use Reduction Initiative. Consider adopting a per capita water use reduction goal which mandates the reduction of water use of 20 percent per capita with requirements applicable to new development and with cooperative support of the water agencies.</p>	<p>Consistent. California Green Building Standards Code, Chapter 5, Division 5.3, Section 5.303.2 requires that indoor water use be reduced by 20 percent. Section 5.304.3 requires irrigation controllers and sensors. The Specific Plan also contains a variety of water conservation features. Mitigation Measures 4.16.1.6.1A, B, and C also provide water reduction measures.</p>
<p>R3-W1: Water Efficiency Training and Education. Work with EMWD and local water companies to implement a public information and education program that promotes water conservation.</p>	<p>Consistent. Tenants and owners within the WLCSP will provide water conservation information from EMWD and other sources to workers on a regular basis.</p>
<p>R2-S1: City Diversion Program. For Solid Waste, consider a target of increasing the waste diverted from the landfill to a total of 75 percent by 2020.</p>	<p>Consistent. The project would incorporate standard City waste reduction features and Mitigation Measure 4.7.6.1A (has a target to reduce waste by 75 percent by 2020).</p>
<p>C11: Require that developer recycle existing street material for use as base for new streets.</p>	<p>Consistent. Project will implement Mitigation Measure 4.7.6.1A where feasible.</p>

Executive Order S-3-05. As discussed in Section 4.7.4, the SCAQMD developed its thresholds based on consistency with California Executive Order S-3-05. As shown in Impact 4.7.6.1, the project’s uncapped GHG emissions would not exceed the SCAQMD’s industrial threshold. Therefore, the project would not conflict with Executive Order S-3-05. This impact is less than significant.

Specific Plan Design Features. The WLCSP contains a sustainability section that emphasizes water and energy conservation throughout the project design, which in turn will help reduce GHG emissions (Section 1.3.2, Green Building-Sustainable Development).

Mitigation Measures. Implementation of previously referenced **Mitigation Measures 4.3.6.3B, 4.3.6.4A, 4.3.6.3C, 4.3.6.3D, 4.7.6.1A, 4.16.1.6.1A, 4.16.1.6.1B, 4.16.1.6.1C, 4.16.4.6.1A, 4.16.4.6.1B, and 4.16.4.6.1C** will help reduce project-related GHG emissions and therefore make it more consistent with GHG reduction plans, policies, and/or regulations.

Level of Significance After Mitigation. Less than significant (original DEIR conclusion was significant). As previously identified, implementation of the proposed project could result in the development of an approximately 40.6 million square foot high cube-logistics distribution logistics. The proposed project includes a variety of physical attributes and operational programs that would help reduce operational-source pollutant emissions from worker commuting, including GHG emissions. Future development that would occur under the proposed project would be consistent with greenhouse gas emission reduction strategies and policies, including the City’s Climate Change Strategy. The project would implement the Mitigation Measures listed above to

reduce its contribution to GHG emissions and to ensure it does not conflict with or impede implementation of reduction goals identified in AB 32, Governor's Executive Order S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor. In addition, the project would also be subject to all applicable regulatory requirements, which would also reduce the GHG emissions of the project. Therefore, the proposed project would not conflict with any applicable plan, program, policy, or regulation related to the reduction of GHG emissions. Impacts are considered less than significant.

Similar to the discussion of cumulative air quality impacts, the project may employ workers locally from the City. This has the benefit of improving the local jobs/housing balance leading to air quality benefits in terms of shorter trip lengths, which lead to lower emissions than if the workforce was derived from distant locations.

The analysis in the EIR concluded that the Project's contributions to climate change are less than significant. Given (i) the global nature of climate change; (ii) uncertainty regarding the extent to which anthropogenic sources are the true causes of any increase in the earth's temperatures; and (iii) the lack of emissions controls being imposed by the world's most rapidly developing nations, even if there is a causal relationship between anthropogenic emissions and an increase in the world's temperature, it is difficult to argue that an individual Project's cumulative contribution to climate change is foreseeable and cumulatively considerable. Nonetheless, the State of California has adopted a number of policies, including AB32, Governor's Executive Order S-3-05, and Pavley I, that provide the structure and commitment to address California's contribution to global climate change. Since the proposed project is consistent with these policies, including being below the SCAQMD threshold for greenhouse gases that was structured in accordance with these State policies, the project is consistent with greenhouse gas plans, policies and regulations.

4.7.7 Cumulative Impacts

Given the findings of AB 32, of SB 97, and the requirements of CEQA, the Lead Agency must determine whether a project will or will not have a cumulatively considerable contribution to greenhouse gas emissions and global climate change. Due to the lack of guidance for determining the significance of cumulative impacts to climate change from projects, and out of an overabundance of caution, the project has been evaluated to determine whether emissions of greenhouse gases have been minimized to the extent feasible with current technology and measures.

While it is not possible for any one development project to have a significant impact on global warming or climate change, the proposed project will contribute to cumulative GHG emissions in California. Cumulatively, the buildout of the proposed project would contribute approximately from 12,000 metric tons of CO₂e in its first year of construction up to 386,000 mt CO₂e per year at buildout (with mitigation). Of those emissions at buildout, the majority, 98 percent, are within the AB 32 cap meaning that total emissions will not increase due to the cap-and-trade program. The remainder, approximately 6,000 mt CO₂e per year at buildout, represents an increase in uncapped emissions, which is 0.001 percent of California's total emissions of 458.68 million mt of CO₂e in 2012 for the entire State. Comparing the state inventory to the project's inventory is not a straightforward comparison because different methods are utilized in each inventory. The mitigation measures discussed above will reduce the project's emissions of GHGs to below significance. The CARB is currently in the process of designing regulations to monitor, limit, and ultimately reduce California GHG emissions, but there are as yet no adopted numerical or quantifiable standards for assessing the significance of cumulative impacts from projects in the South Coast Air Basin.

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Cumulatively, the emissions from electricity production (which are capped under the requirements of AB 32) would comprise approximately 26 percent of the project's total CO₂e emissions. Water usage and solid waste disposal emissions comprise approximately 2 percent of the project's total CO₂e emissions while the emissions from vehicle exhaust would comprise approximately 70 percent of the project's total CO₂e emissions. The emissions from vehicle exhaust are controlled by the State and Federal governments and are outside the control of the City. The remaining CO₂e emissions are primarily associated with building systems. The proposed project is required to comply with existing State and Federal regulations regarding the energy efficiency of buildings, appliances, and lighting, which would reduce the project's electricity demand. The new buildings constructed in accordance with current energy efficiency standards would be more energy-efficient than older buildings.

With implementation of the strategies and programs described previously, the project is consistent with the strategies to reduce California's emissions to the levels proposed in Executive Order S-3-05. In addition, emissions not covered or capped by AB 32 are below the significance threshold. Therefore, cumulative impacts are less than significant.

4.8 HAZARDS AND HAZARDOUS MATERIALS: TABLE OF CONTENTS

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NOTE TO READERS. A number of comments were made regarding hazardous materials, mainly potential pesticide contamination¹. In response, the mitigation measures in this section have been revised. Otherwise, no major revisions have been made to this section in response to comments.

4.8 HAZARDS AND HAZARDOUS MATERIALS

This section describes and analyzes the potential impact to human health and the environment due to the exposure to hazardous materials or conditions that could be encountered as a result of the construction activities within the WLC project area and also the operational activities of the project. Potential effects include those associated with the routine transport, use, or disposal of hazardous materials; reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; safety hazards associated with the project's existing agricultural use, impairment/interference with adopted emergency response plans or emergency evacuation plans, and exposure of people or structures to risks involving wildland fires.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The evaluation was based on review of available information included with the application, review of previous Phase I Environmental Site Assessments for the WLC project area, and review of other

¹ Letters F-7A and F-7B from Lozeau Drury LLP (Comments F-7A-18, -21 and -22 and F-7B-2) and in Letter F-8 from Shute Mihaly.

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published materials. This section is based in part on the following reports, which are included as Appendix I of this EIR:

- *Phase I Environmental Site Assessment Reports*, World Logistic Center Specific Plan WLC project area—approximately 3,820 acres in the WLC planning area, south of State Route 60 (SR-60) between Redlands Boulevard and Gilman Springs Road, extending to the southerly City Limit, LOR Geotechnical Group, Inc., 18 reports for various locations within the WLC project area prepared between June 10, 2003–May 28, 2008, plus one comprehensive Phase 1 as recent as January 2013.

4.8.1 Existing Setting

4.8.1.1 Project Site History

The project area is approximately 3,714 acres and is located in Rancho Belago, the eastern portion of the City of Moreno Valley, in northwestern Riverside County. The area is bounded by State Route 60 (SR-60) to the north, Gilman Springs Road to the east, Redlands Boulevard to the west, and the City boundary to the south.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

Within the project area, 2,610 acres will be covered by the World Logistics Center Specific Plan, which is planned to be developed with up to 40.6 million square feet of modern logistics facilities. The remainder of the project area, approximately 1,104 acres is owned by the State and by existing utility facilities. This area will be designated as permanent open space and will allow the continued operation of the utility facilities.

The majority of the project area is vacant undeveloped land. There are seven existing single-family homes with associated ranch/farm buildings located throughout the project area. The project area has been historically used for dry-farming and livestock grazing, and portions of it are currently being dry farmed. There are currently no flood control facilities that are owned, operated, or maintained by the Riverside County Flood Control and Water Conservation District (RCFCWCD). Over the years, 18 separate Phase I Environmental Site Assessments (ESAs) have been conducted covering a large majority of the property (Table 4.8.A).

Table 4.8.A: Project-Related Phase 1 Hazmat Reports

Location	Date	Conclusion and Follow Up Action
<i>Group A Properties</i> consisting of 352 acres located between Redlands Boulevard and Gilman Hot Springs Road to the east and west and Eucalyptus and Davis Roads to the north and south.	6/10/03	<i>No Further Action:</i> No recognized environmental conditions associated with the site.
<i>Colville Property</i> , 17.8 acres (2 parcels, APNs 478-240-006 and 007) located on the southwest corner of Alessandro Boulevard and Theodore Street.	2/23/04	<i>No Further Action:</i> No recognized environmental conditions associated with the site.
<i>13241 Theodore Street.</i>	2/11/05	Clean up of one empty 55-gallon metal drum and trash and debris for disposal in a Class III municipal landfill; no further remedial action necessary.

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Table 4.8.A: Project-Related Phase 1 Hazmat Reports

Location	Date	Conclusion and Follow Up Action
<i>Kerr Stock Farm Properties: 12600 and 12560 Sinclair Street; 4 parcels, 120± acres, located southeast of Redlands Boulevard and SR-60; Triana Property, 12540 Sinclair Street (APN: 477-090-001), southeast of Redlands Boulevard and SR-60; Smith Property, 0.88-acre property at 12550 Sinclair Street (APN 477-090-013).</i>	5/5/03	Several 55-gallon and smaller containers of paint, both latex and oil base containers, and waste oil found; containers and stained soil are to be removed and properly disposed of. Dumped green waste and household trash and debris to be removed; two aboveground fuel tanks to be removed. Based on the age of structures, an asbestos and lead-based paint survey should be conducted prior to demolition. No further remedial action necessary upon removal of above-noted items.
<i>Sanindon Property, 19± acres (APNs 477-090-004 and 006) located southeast of Sinclair Street and SR-60.</i>	9/10/03	<i>No Further Action:</i> No recognized environmental conditions associated with the site.
<i>APNs 478-240-011, 017, 026, 027, and 030, 46.5+-acre vacant property, located on the southeast corner of Brodiaea Avenue and Sinclair Street.</i>	4/30/04	<i>No Further Action:</i> No recognized environmental conditions associated with the site.
<i>Cehade Property, 2 parcels (APNs 478-240-24 and 29) 18.75 acres, southwest of Alessandro Boulevard and Theodore Street.</i>	12/29/04	Removal of one 55-gallon waste oil drum. Surface-stained surrounding soil to be removed and properly disposed of. No further remediation necessary.
<i>APNs 478-240-019, 025, and 028.</i>	4/11/05	Significant illegal dumping of trash and debris, but all appears suitable for disposal in a Class III municipal landfill; ten tires present, additional disposal fees may be incurred; metal 5-gallon bucket about half full with racing fuel, located in the southeast portion of Parcel 028 west of the east boundary and southeast of the old borrow pit quarry area; bucket should be lawfully transported off site and properly disposed of or recycled. No further remedial action required.
<i>Mabon Property (APN 477-080-042) 8.8+ acres.</i>	2/28/05	<i>No Further Action:</i> No recognized environmental conditions associated with the site.
<i>APNs 477-090-008 through 012 and 477-100-011 through 014, 69.5± acres.</i>	11/30/04	Trash and debris present appeared suitable for disposal in a Class III municipal landfill, but forty tires, including some large-sized tires, may require special disposal fees. A black 5-gallon bucket, approximately one-third full of waste oil, observed at north end of the drainage channel. Very minor oil-stained soil and organic debris was noted. The oil stained soil is insignificant in extent and is of no environmental concern, the 5-gallon bucket of waste oil should be properly disposed of or recycled. No further remedial action required.
<i>APN 477-090-007, northeast corner of Sinclair Street and Fir Avenue.</i>	4/25/07	<i>No Further Action:</i> No recognized environmental conditions associated with the site.
<i>APNs 477-080-027, 028, 029, and 030, 36.7+ acres of vacant land, southeast corner of Ironwood Avenue and Sinclair Street.</i>	3/24/05	<i>No Further Action:</i> No recognized environmental conditions associated with the site.
<i>APNs 478-240-005 and 008.</i>	3/1/06	Illegal dumping of trash and debris, especially on the south end near the boundary. All of the trash and debris observed appear to be suitable for disposal in a Class III municipal landfill. No further remedial action required.

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Table 4.8.A: Project-Related Phase 1 Hazmat Reports

Location	Date	Conclusion and Follow Up Action
<i>Himada Property</i> , 30050 Dracaea Avenue, (APN 422-070-033)	7/9/07	Significant amounts of trash and debris are present and appear suitable for disposal in a Class III municipal landfill. No drums, barrels, or other containers were observed; one partially crushed vehicle battery and minor oil-stained soils were observed, battery should be properly transported off site for recycling or disposal. The minor oil stained soils is a <i>de minimis</i> condition and should be mitigated as a result of normal grading activities. No further remedial action required.
<i>Sunnymead Poultry Group "C" Properties</i> consisting of 421 acres east of Theodore Street and north of Alessandro Boulevard.	5/5/03	A former chicken ranch made up 75 acres and the remainder was dry-farmed. Former underground storage tanks (USTs) converted to aboveground storage tanks (ASTs) were present at the chicken ranch, which was undergoing demolition. Soil samples collected during and after demolition activities confirmed the removal of hydrocarbon-affected soil. Soil samples collected from beneath the location of the two former USTs at 6, 8, and 10 feet deep had no reported concentrations of petroleum hydrocarbons. Pesticide sampling (42 samples) indicated all results below residential limits. No further action.

Source: Phase 1 Environmental Site Assessment Reports (various), LOR Geotechnical.

Historic land uses noted for the WLC project area included tree farms (olives/citrus), rural residential uses, a horse ranch, minor auto repair related to residential users, two dairies, and a chicken ranch. However, the tree orchards were not sustained and the horse, dairy, and chicken ranches ceased operating several years ago as well. Present land use is limited to dry farming, undeveloped vacant land, and seven residential structures. In 1992, the City approved a master-planned, mixed-use community called "Moreno Highlands" on most of the project site but no uses within this community were ever built.

Dry-land farming does not typically apply pesticides or other agricultural chemicals. The ESAs did not find significant residual pesticides within the project area. Soil sampling conducted within limited site characterizations revealed trace concentrations of pesticides present in the near-surface soils at some of the sampling locations. However, the sample results showed concentrations of pesticides to be below the Environmental Protection Agency's (EPA's) Preliminary Remediation Goals for residential properties, which indicated that no further sampling was necessary and unrestricted use of the property was allowed.

NOTE: The following information was added to clarify or expand on the issue of agricultural chemicals raised in Letter F-7A, F-7B, and F-8.

The commenters all expressed the opinion that the Phase 1 documents for the project site did not provide an accurate assessment of current soil conditions. The many Phase 1 reports done on many parcels throughout the WLC property and over a long period of time constitute an extensive random sampling of the on-site soils, and demonstrate the site does not contain widespread soil contamination from pesticides. Dry farming does not use a variety of agricultural chemicals because it relies on ambient rainfall and other conditions to support the limited crops grown on the site. Many of the organo-chloro-phosphate (OCP) based chemicals used for more intensive irrigated crops are not used in dry farming due to their cost and lack of irrigation to distribute the chemicals. In addition, the chemicals used in dry farming typically break down quickly in the soil and are not broadcast but rather

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applied by hand sprayers, so any applications would be necessarily limited. There is no practical reason why intense crop herbicides or pesticides like DDT would be used in conjunction with dry farming in general, and there is no evidence such chemicals were used on the WLC site in the past. In fact, onsite soil sampling conducted for the Phase 1 reports found no evidence of significant OCP contamination on the WLC site. The chicken ranch and related facilities that were on the site for a time are in the process of being removed, including any surficial materials with waste products. There has been no empirical evidence presented that would demonstrate there is actual contamination by agricultural chemicals or wastes on the WLC site.

According to records from the State Department of Toxic Substances Control (DTSC), dry farmed agricultural properties of the WLC project site have had pesticides like 2,4-Dichlorophenoxyacetic acid, commonly called 2, 4, D applied in the past. 2, 4 D is the 3rd most common herbicide used in the US and can be purchased at retailers like Home Depot and Lowes. 2,4 D has a half-life of a few days to two weeks, depending on site conditions (available water, sun etc.). Within a few months after application, the residual amount of pesticide is less than 1 percent. Dry farming operations, and any pesticide application, will have ceased well before the actual grading of the site, and any current pesticide application, will have biodegraded to less than significant levels. 2,4 D was the most common pesticide applied to the site, often combined with Agri-Dex (as indicated in the DTSC records) which is used as a wetting agent to increase absorption of the 2, 4 D. The DTSC records indicate these chemicals were applied to grapes on the site, but there are no areas of cultivated grapes at present on the WLC site. It is possible some of these materials were used on the rural residences on the site, however the 2, 4 D and Agri-Dex were by far the most common chemical used on the site by weight in 2010, which accounted for almost a thousand pounds of chemical applied. Other chemicals applied to properties within the WLC site during that time include pyrethrins, spinosad, beta-cyfluthrin, sulfur, "Roundup" (glyphosate), "scythe, and rimsulfuron mainly as herbicides and fungicides, but less than one pound of each of these materials was typically applied at a given time, so the overall potential exposure is considered to be relatively minor at present. Therefore, there is no evidence there will be adverse environmental impacts on adjacent property owners or WLC site workers from past pesticide applications at the site, including 2, 4 D. However, to err on the side of caution, Mitigation Measure 4.8.6.1A has been modified to include soil sampling for agricultural chemicals prior to grading of the 7 rural residential lots where it is possible more chemical materials were applied in more concentrated locations than broadcast on large wheat fields.

The Phase I ESAs noted some illegal dumping of trash and debris, including paints, tires and trash, which has occurred on and around the project area. Most of the trash and debris observed appeared to be suitable for disposal in a Class III municipal landfill. Prior to development, all containers of hazardous materials and waste will need to be lawfully transported off site for disposal or recycling by a licensed hazardous waste transporter.

Former aboveground and belowground fuel storage tanks associated with the former chicken ranch were removed. Hydrocarbon-affected soil associated with the aboveground storage tanks (ASTs) and other chicken ranch operations were removed during demolition activities at the site. During the demolition activities, hazardous waste in 55-gallon drums and smaller, and hydrocarbon-affected soil were removed and transported off site by a licensed hazardous waste hauler for proper disposal.

Given that some of the residential and rural farming-related structures date back to the 1930s and 1940s, it is likely that some of them contain asbestos and lead-based paint. Therefore, it is recommended that the demolition of the structures at the site be performed in accordance with all applicable regulations for the handling of such materials.

The Phase I ESAs revealed no evidence of recognized environmental conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to the WLC project area. A recognized environmental condition is defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a

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past release, or a material threat of a release of any hazardous substance or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property.

Several natural gas pipelines (16-inch to 36-inch diameter) cross the site (see also Section 4.16, *Utilities and Service Systems*). At present, the San Diego Gas and Electric Company (SDG&E) company and the Southern California Gas Company (SCGC) maintain these natural gas pipelines under medium and high pressure across the central and southern portions of the site. None of the rural residences on site is located adjacent to any of these existing regional gas lines.

4.8.1.2 Surrounding Area

Major access to the project area is from State Route 60, Redlands Boulevard, Alessandro Boulevard, Gilman Springs Road, and Theodore Street. Redlands Boulevard, Theodore Street, and Gilman Springs Road are north-south roadways that intersect with SR-60.

There is little development adjacent to the eastern and southern boundaries of the project area. The area to the east of the project area is commonly referred to as the Badlands, a rugged area that separates the City of Moreno Valley from San Timoteo Canyon and the City of Beaumont. Due to its steep slopes and canyons, the Badlands area has experienced little development; however, there are approximately ten single-family homes in the area east of Gillman Springs Road adjacent to the project site. The Badlands Sanitary Landfill, operated by the County of Riverside Waste Management Department, is located approximately 1.5 miles northeast of the WLC project area. The area south of the project area is known as the San Jacinto Wildlife Area (SJWA), which includes an “Upland Game Hunting Area”. The SJWA is owned and operated by the California Department of Fish and Wildlife (CDFW) and contains approximately 20,000 acres of restored wetlands and ponds. Hunting is allowed, with the proper state hunting license. Depending on the time of year, hunting in this area includes jackrabbits, rabbits, waterfowl as well as pheasants, chukar, and quail. The SJWA is accessed from Davis Road, off of Ramona Expressway. In addition to the hunting allowed at the SJWA, there are private hunting clubs that abut the SJWA, including the Mystic Lake Duck Club and the Four Winds Pheasant Club.

The Lake Perris State Recreation Area is immediately southwest of the project site and is owned and operated by the California State Parks Department. It contains approximately 6,000 acres of open space land, which is used both for recreation and preservation of the natural southern California landscape.

A large logistics facility (1.8 million-square foot Skechers facility) is located northwest of the project area. Other developed properties include residential neighborhoods along Redlands Boulevard along the western boundary of the project area. An area of the City known as Old Moreno is adjacent to the southwest portion of the project site (at the intersection of Redlands Boulevard and Alessandro Boulevard). The homes along Merwin Street and Bay Street and east of Redlands Boulevard are the closest sensitive receptors to the project site.

There are two future commercial sites located immediately north of the project area. One is located at the northwest corner of Theodore Street and Eucalyptus Avenue (approved for 80,000 square feet), and the other is at the northeast corner of Redlands Boulevard and Eucalyptus Avenue (approved for 120,000 square feet). The nearest large-scale commercial development is located on the south side of SR-60 at Moreno Beach Drive, approximately 1.25 miles to the west of the proposed project. This shopping complex includes Walmart and Target along with restaurants and ancillary commercial and service uses, as well as the Moreno Valley Auto Center. The central core of Moreno Valley, which includes other residential neighborhoods and commercial activity, is located approximately three miles west of the project area.

There are no airports in the vicinity of the project area. The nearest airport is March Air Reserve Base (MARB) located approximately seven miles southwesterly of the project area. The MARB is under the authority of the March Joint Powers Authority (MJPA), which acts as the land use authority, in addition to the Redevelopment Agency as well as the March Inland Port Airport Authority are involved in the reuse of the former March Air Force Base. The March Air Field is a joint-use airport, used both for military and civilian purposes. March Inland Port (MIP)¹ is the civilian portion of the airport. The proposed project area is not located within the Airport Influence Area.

There are no existing school facilities within one-quarter of a mile of the project area. Calvary Chapel Christian School is the closest existing school, located approximately 1.17 miles northwest of the project area, north of SR-60. There is a site for a proposed public elementary school, Wilmot Elementary School, located approximately one-quarter of a mile from the project area located on Bay Avenue at Wilmot Street. A Preliminary Environmental Assessment Report (PEA) was prepared for the proposed elementary school site in July 2007.

4.8.1.3 NOP/Scoping Comments

Several residents commented during the NOP period that there are major natural gas facilities located on the WLCSP project site, and were concerned about safety during construction, relocation, and operation of the pipelines. During the scoping meeting, a conservation group representative encouraged the City to look at freeway accident data involving trucks and expressed concern that accidents on the freeway would cause truck drivers to divert off the freeway and onto local streets in Moreno Valley. The WLC project biology report also warned of risks to new project buildings and employees from errant gunfire from the Mystic Lake area (i.e., hunting clubs) (MBA 2013). Several residents also commented that there are major natural gas facilities and pipelines located on the WLCSP project site. These comments are addressed in the following analysis of potential hazards.

4.8.2 Existing Policies and Regulations

4.8.2.1 Federal Regulations

Comprehensive Environmental Response, Compensation, and Liability Act. Discovery of environmental health damage from disposal sites prompted the U.S. Congress to pass the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). The purpose of the CERCLA is to identify and clean up chemically contaminated sites that pose a significant environmental health threat. The Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities.

Superfund Amendments and Reauthorization Act. The Superfund Amendments and Reauthorization Act (SARA) pertain primarily to emergency management of accidental releases. It requires formation of State and local emergency planning committees, which are responsible for collecting, material handling, and transportation data for use as a basis for planning. Chemical inventory data are made available to the community at large under the “right-to-know” provision of the law. In addition, SARA also requires annual reporting of continuous emissions and accidental releases of specified compounds. These annual submissions are compiled into a nationwide Toxics Release Inventory (TRI).

Resource Conservation and Recovery Act. The Resource Conservation and Recovery Act (RCRA) Subtitle C addresses hazardous waste generation, handling, transportation, storage, treatment, and

¹ March Inland Port was previously called March Air Reserve Base.

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disposal. It includes requirements for a system that uses hazardous waste manifests to track the movement of waste from its site of generation to its ultimate disposition. The 1984 amendments to the RCRA created a national priority for waste minimization. Subtitle D establishes national minimum requirements for solid waste disposal sites and practices. It requires states to develop plans for the management of wastes within their jurisdictions. Subtitle I requires monitoring and containment systems for underground storage tanks that hold hazardous materials. Owners of tanks must demonstrate financial assurance for the cleanup of a potential leaking tank.

Hazardous Materials Transportation Act. The Hazardous Materials Transportation Act is the statutory basis for the extensive body of regulations aimed at ensuring the safe transport of hazardous materials on water, rail, highways, in the sky, or in pipelines. It includes provisions for materials classification, packaging, marking, labeling, placarding, and shipping documentation.

4.8.2.2 State Regulations

California Code of Regulations. Most State and Federal regulations and requirements that apply to generators of hazardous waste are spelled out in the California Code of Regulations (CCR), Title 22, Division 4.5. Title 22 contains the detailed compliance requirements for hazardous waste generators, transporters, treatment, storage, and disposal facilities. Because California is a fully authorized State according to RCRA, most RCRA regulations (those contained in 40 Code of Federal Regulations [CFR] 260, et seq.) have been duplicated and integrated into Title 22. However, because the Department of Toxic Substance Control (DTSC) regulates hazardous waste more stringently than the U.S. EPA, the integration of California and Federal hazardous waste regulations that make up Title 22 do not contain as many exemptions or exclusions as does 40 CFR 260. As with the California Health and Safety Code, Title 22 also regulates a wider range of waste types and waste management activities than do the RCRA regulations in 40 CFR 260. To aid the regulated community, California compiled the hazardous materials, waste and toxics-related regulations contained in CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 into one consolidated CCR, Title 26 “Toxics.” However, the California hazardous waste regulations are still commonly referred to as Title 22. For the purposes of clarity, because of the extensive reach of Title 22 and Title 26, many common household products sold in grocery stores and home improvement warehouses qualify as hazardous materials. These items include household cleaners, detergents, paint, motor oil, lubricants, glues, pesticides, etc. The term “hazardous materials” is also defined to include many on site materials as well, such as lubricants, fuel, etc. Thus, when this section of the EIR discusses the transport and storage of “hazardous materials,” it is referring to the potential transport of bulk products to the project locations and to the temporary storage of such materials at the project sites prior to re-package and transport to subsequent destinations.

Cortese List: Section 65962.5(a). Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop at least annually an updated Hazardous Waste and Substances Sites list (Cortese List). The Cortese List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Release sites include or hazardous materials release sites may include the following:

- All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.
- All land designated as hazardous waste property or border zone property pursuant to Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.

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- All information received by the Department of Toxic Substances Control pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.
- All sites listed pursuant to Section 25356 of the Health and Safety Code.
- All sites included in the Abandoned Site Assessment Program.

The California DTSC is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.

The California Hazardous Material Management Act. The Hazardous Materials Management Act (HMMA) requires that businesses handling or storing certain amounts of hazardous materials prepare a Hazardous Materials Business Emergency Plan (HMBEP), which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program. An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy Federal and State Community Right-to-Know laws and to provide detailed information for use by emergency responders.

Per the California Health and Safety Code (HSC), Chapter 6.95, Section 25500–25532, an HMBEP must be submitted by any business that handles a hazardous material or a mixture containing a hazardous material in quantities equal to, or greater than:

- A total weight of 500 pounds or a total volume of 55 gallons;
- 200 cubic feet of a compressed gas at standard temperature and pressure; and/or
- A radioactive material handled in quantities for which an emergency plan is required pursuant to Parts 30, 40, or 70 of Chapter 10, Title 10, CFR, or equal to or greater than the amounts specified above, whichever amount is less.

An HMBEP must be prepared prior to facility operation. Any business subject to HMBEP requirements shall submit an amendment of its HMBEP to the local implementing agency when there is:

- A 100 percent or more increase in the quantity of a previously disclosed hazardous material;
- Any handling of a previously undisclosed hazardous material subject to the inventory requirements;
- Change of business address;
- Change of ownership;
- Change of business name; and/or
- Change of contact information.

In addition, any business subject to HMBEP requirements is also required to certify the inventory of hazardous materials handled at the business every year. Businesses are also required to review their HMBEP at least once every three years to determine if a revision is necessary. Once the review has been conducted, the business must certify in writing to the local implementing agency that a review has been completed and necessary changes were made. For businesses within the City of Moreno Valley, HMBEPs are submitted to and approved by the County of Riverside Community Health Agency, Department of Environmental Health.

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The California Hazardous Waste Control Law. The Hazardous Waste Control Law (HWCL) is the primary hazardous waste statute in the State of California. The HWCL requires a hazardous waste generator, which stores or accumulates hazardous waste for periods greater than 90 days at an on-site facility or for periods greater than 144 hours at an off-site or transfer facility, which treats, or transports hazardous waste, to obtain a permit to conduct such activities. The HWCL implements RCRA as a “cradle-to-grave” waste management system in the State of California. HWCL specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure their proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reused as raw materials. The HWCL exceeds Federal requirements by mandating source reduction planning and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates the number of types of wastes and waste management activities that are not covered by federal law with RCRA.

State Aeronautics Act (Public Utilities Code Section 21670, et seq.). The Public Utilities Code (PUC) establishes the requirement for the creation of airport land use commissions for every county in which there is located an airport that is served by a scheduled airline. Additionally, these sections of the Code mandate the preparation of Comprehensive Land Use Plans (CLUP) to provide for the orderly growth of each public airport and the area surrounding the airport. The purpose of CLUPs includes the protection of the general welfare of inhabitants within the vicinity of the airport and the general public.

California Emergency Services Act. Government Code 8550–8692 provides for the assignment of functions to be performed by various agencies during an emergency so that the most effective use may be made of all manpower, resources, and facilities for dealing with any emergency that may occur. The coordination of all emergency services is recognized by the State to mitigate the effects of natural, man-made, or war-caused emergencies which result in conditions of disaster or extreme peril to life, property, and the resources of the State, and generally, to protect the health and safety and preserve the lives and property of the people of the State.

State Fire Plan. The State Board of Forestry and the California Department of Forestry and Fire Protection have drafted a comprehensive update of the State Fire Plan for wildland fire protection in California. The planning process defines a level of service measurement, considers assets at risk, incorporates the cooperative interdependent relationships of wildland fire protection providers, provides for public stakeholder involvement, and creates a fiscal framework for policy analysis.

4.8.2.3 County of Riverside Regulations

Riverside County Department of Community Health. The Department of Environmental Health (DEH) of the Riverside County Community Health Agency is responsible for regulation the operations of businesses and institutions that handle hazardous materials or generate hazardous wastes in the City of Moreno Valley.¹ As part of the State-mandated Certified Unified Programs administered by the CalEPA, the DEH coordinates regulatory and enforcement of the following programs: Household Hazardous Waste, Hazardous Waste Minimization, Underground Storage Tanks (USTs), Hazardous Waste Generator Permits, and Hazardous Materials Handlers Program.

Riverside County Airport Land Use Plan. The Riverside County Airport Land Use Commission (ALUC) assists local agencies by ensuring the development of compatible land uses in the vicinity of

¹ Section 5.5 Hazards, Moreno Valley General Plan, Final Program EIR, July 2006.

existing airports. The ALUC adopted the Airport Land Use Plan (ALUP) for MIP on April 26, 1984. A new ALUC is currently in the process of updating the 1984 ALUP for MIP;¹ however, the portion of this document that pertains to MARB is not available for public review at this time. The ALUP specifies land use restrictions for areas falling within an airport's Influence Area boundaries.

2005 Air Installation Compatible Use Zone (AICUZ) Study. March Air Field is a joint-use airport, used for both military and civilian (MIP) purposes. The airport is owned and regulated by the military. Military installations prepare AICUZ studies to protect vicinity land uses from hazard and noise impacts associated with military airports. The Air Force Reserve (AFRES) completed a new AICUZ for March Air Field in 2005. The AICUZ delineates the clear zones and accident potential zones for the joint use airfield, as well as the noise contours based upon the project flight operations and use of the aviation field. The noise contours include both military and civilian use, as projected in the Federal Aviation Administration (FAA) conformity determination.

4.8.2.4 City of Moreno Valley

General Plan Policies. The Safety Element and the Land Use Element of the General Plan define the following issues and opportunities related to hazards that are relevant to the proposed project:

- **Safety Element**

- **Issues and Opportunities Section 6.2.8:** Acknowledge natural topography, terrain, volatile fuel types, and local climatic conditions that have resulted in large and damaging wildfires, particularly when the Santa Ana winds blow, increasing the potential for wildland fires. Consider these factors during the planning phases of development and include mitigation measures to reduce potential life safety and other consequences of these types of fires.
- **Issues and Opportunities Section 6.2.10:** Require the use of automatic sprinkler systems in new and existing structures to control future demand for fire protection services, and to reduce fire losses. Continue annual fire inspections of all occupancies by the Fire Prevention Bureau to reduce the potential for fire code violations and to inspect sprinkler systems.
- **Issues and Opportunities Section 6.2.13:** Emphasize planning, training, disaster drills and public education and awareness programs to prepare for emergency and disaster response.
- **Issues and Opportunities Section 6.9.2:** The City has the ability to establish land use patterns that minimize the hazards associated with the use, storage and transport of hazardous materials. The Household Hazardous Waste Element and the Hazardous Waste Management Plan for the City of Moreno Valley contains programs on the reduction of hazardous waste and criteria for the siting of hazardous waste facilities. These plans should be updated from time to time to reflect changing conditions.

- **Land Use Element**

- **Issues and Opportunities Section 2.8.2:** Fees will need to be collected in conjunction with new development to ensure that new development pays its fair share toward the future expansion of City facilities.

NOTE: The following changes have been made in response to Comment F-13-32 in Letter F-13 from Johnson & Sedlack on Behalf of Sierra Club, Moreno Valley Group & Residents for a Livable Moreno Valley.

¹ Riverside County Airport Land Use Commission New Compatibility Plans, http://www.rcaluc.org/plan_new.asp, website accessed April 23, 2012.

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- **Safety Element Goal**

Goal 6.1 To achieve acceptable levels of protection from natural and man-made hazards to life, health, and property

Local Hazard Mitigation Plan. The City of Moreno Valley prepared a Local Hazard Mitigation Plan (LHMP) to develop an understanding of the natural and man-made hazards to the City and to determine ways to reduce those risks, prioritize and implement mitigation strategies.

4.8.3 Methodology

Evaluation of hazards and hazardous material impacts associated with the proposed project included a focus on the use, generation, management, transport, and disposal of hazardous or potentially hazardous materials on the project site. Phase I ESAs were prepared to document existing site conditions involving the presence or absence of hazardous materials that may have been deposited through previous land uses. In addition, the City of Moreno Valley's LHMP was consulted to identify existing known hazards that may affect the project area. For airport hazards, the County of Riverside ALUC was consulted to determine if the proposed WLC project would increase air hazards. In determining the level of significance, the analysis assumes that construction and operation of the proposed project would be in compliance with relevant local, State, and Federal laws and regulations pertaining to the use, storage, and disposal of hazardous materials.

4.8.4 Thresholds of Significance

Based on Appendix G of the *CEQA Guidelines*, the proposed WLC project would result in a significant adverse impact with regard to hazards if it were to:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- For a project located within an airport land use plan or where such a plan has not been adopted within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;
- For a project located within the vicinity of a private airstrip, result in a safety hazard for people working in the project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation; and/or
- Result in the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.8.5 Less than Significant Impacts

In each of the following issues, either no impact would occur (therefore, no mitigation would be required) or adherence to established regulations, standards, and policies would reduce potential impacts to a less than significant level.

4.8.5.1 Within Two Miles of a Private Airport or Within an Airport Land Use Plan or Within Two Miles of a Public Airport

Threshold	For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the proposed project area? Would the project be located within an airport land use plan or where such a plan has not been adopted within two miles of a public airport or public use airport, resulting in a safety hazard for people residing or working in the project area?
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The nearest airport to the project area is MARB, approximately 7 miles to the southwest. The airfield is operated by two entities, March Air Reserve Base (military) and March Inland Port Airport Authority (quasi-governmental/private). In addition, Perris Valley Airport is located approximate 15 miles southwest of the project area. Perris Valley Airport is a private airport that is open to the public, and is utilized for skydiving and ballooning activities. The WLC project area is not located within the Airport Influence Area for either airport. Given the distance of the WLC project area to both airports in the vicinity, the development of the WLC project area as proposed would not result in private airport safety hazards for people working in the WLC project area. No impacts associated with this issue would occur and no mitigation is required.

4.8.5.2 Existing or Proposed School

Threshold	Would the proposed project emit hazardous emissions or handle acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
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There are no existing school facilities within one-quarter of a mile of the project area. The nearest existing school is Calvary Chapel Christian School which is located approximately 1.17 miles northwest of the project. There is one proposed elementary school site that is located within one-quarter mile of the WLC project area. The site for proposed Wilmot Elementary School is located on Bay Avenue at Wilmot Street, approximately 0.25 mile west of the project area. A PEA was prepared for the proposed elementary school in 2007; however, there has been no further discussion by the Moreno Valley Unified School District (MVUSD) since then.¹ The City does not have jurisdiction with respect to the location, design, or construction of school facilities. The City works with each school district concerning the design of roads and other public improvements in and around school sites. The City also notifies any school district of development proposals that might affect school facilities.²

The amount and type of materials that would be used during project construction (building and infrastructure) or stored in the high-cube logistics distribution center after construction is unknown at this time. The emission of air pollutants is discussed in the Air Quality Section of the EIR. While the warehouse facilities themselves are not expected to utilize acutely hazardous materials, the possibility exists that such materials could be stored or transported to and from the project site. For the purposes of this analysis, it is assumed that the project will handle substances that may be acutely hazardous. The handling of hazardous materials or emission of hazardous substances in

¹ Moreno Valley Unified School District, Minutes for Regular Meeting of the Board of Education, July 17, 2007.

² City of Moreno Valley General Plan, Land Use Element, Section 2.5.0.

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accordance with the Hazardous Materials Business Emergency Plan (HMBEP) as required by applicable local, State, and Federal standards, ordinances, and regulations will ensure that impacts associated with environmental and health hazards related to an accidental release of hazardous materials or emissions of hazardous substance near existing or proposed schools are less than significant and no mitigation is required.

4.8.5.3 Routine Transport, Use, or Disposal of Hazardous Materials and Reasonable Foreseeable Upset and Accident Conditions

Threshold	Would the proposed project create a significant hazard to the public through the routine transport, use, or disposal of hazardous materials? Would the proposed project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident?
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The proposed project area includes the development of 40.6 million square feet of high-cube logistics warehouse space. These warehouses would be used primarily for the storage and/or consolidation of manufactured goods, with minimal assembly and no manufacturing activities, prior to their distribution to secondary retail outlets.

Truck-Related Risks. Truck activities would frequently occur during off-peak hours. Deliveries to the project area would come from the Ports of Long Beach and Los Angeles as well as from other locations. Goods sorted for re-distribution would then be delivered via truck to both in and out of state locations. The exact tenants of the warehouse buildings are unknown at this time and will likely change over time so there is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products such as paint products, solvents, and cleaning products may be stored and transported in conjunction with the proposed warehouse uses. These hazardous materials would only be stored and transported to and from the site. Manufacturing and other chemical processing will not be permitted under the provisions of the Specific Plan. Exposure to hazardous materials during the operation of the proposed on-site uses may result from (1) the improper handling or use of hazardous substances; (2) transportation accidents; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individual or environment affected.

The City of Moreno Valley has no direct authority to regulate the transport of hazardous materials on State highways.¹ This activity is governed by the United States Department of Transportation (USDOT), as described in Title 49 of the Code of Federal Regulations² and by Title 13 of the California Code of Regulations. The State Office of Hazardous Materials Safety enforces regulations for the safe transportation of hazardous materials. It is possible that vendors may bring hazardous materials to and from the project site. Appropriate documentation for all hazardous waste that is transported in connection with project site activities would be provided as required by hazardous materials regulations. Hazardous waste produced on site is subject to requirements associated with accumulation time limits, proper storage locations and containers, and proper labeling. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company, which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal. Compliance with applicable regulations would reduce impacts associated with the use, transport, storage, and sale of hazardous materials. For

¹ Moreno Valley General Plan, Safety Element, 6.9.1

² Code of Federal Regulations, Title 49—Transportation, Pipeline and Hazardous Materials Safety Administration, Department of Transportation, http://ecfr.gpoaccess.gov/cgi/t/text/text_idx?c=ecfr&tpl=/ecfrbrowse/Title49/49tab_02.tpl, site accessed April 23, 2012.

example, the California Hazardous Materials Management Act requires that businesses handling or storing certain amounts of hazardous materials prepare a Hazardous Materials Business Emergency Plan, which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program.

The enforcement of applicable local, State, and Federal standards, ordinances, and regulations will ensure that potential impacts associated with environmental and health hazards related to an accidental release of hazardous materials are less than significant and no mitigation is required.

Freeway Accident Risks. The following information is provided in response to NOP/Scoping comments regarding freeway accidents. According to the California Department of Transportation's Traffic Accident Surveillance and Analysis System (TASAS) report, there are approximately 105 accidents per year along a 3.75-mile stretch of SR-60 between Nason Street and Gilman Springs Road in the general vicinity of the project area. The data were derived for the three-year span of January 1, 2008, to December 31, 2010¹. During this period, there were 316 accidents (average of 105 per year) along SR-60 (both westbound and eastbound). Of the 316 accidents, approximately 15.8 percent involved trucks (tractor/trailer). There were 127 eastbound accidents (19 or 15% involving trucks) and 189 westbound accidents (31 or 16.4% involving trucks). It is possible that congestion on the freeway might result in some WLCSP-related trucks exiting the freeway at off-ramps other than Theodore Street, or attempting to enter the freeway at on-ramps if the drivers see or hear on their radios that the freeway is congested. In most instances, drivers will use the shortest route indicated on GPS system maps or the route(s) they have used previously, regardless of traffic conditions at the time. In addition, due to the type of uses planned within the WLCSP, much of the project-related traffic will be accessing the WLC site during off-peak times, so the changes of congestion or accidents occurring during the time they are accessing the site would be reduced. The accident database contains no information on whether the truck was the cause of a particular accident or the time of day, the vehicles involved, if hazmat spills occurred, if trucks or other vehicles detoured off the freeway, etc. Without these data, it is overly speculative to extrapolate any particular conclusions. Despite the lack of specific evidence regarding freeway accidents, it is reasonable to conclude that potential environmental impacts in this regard will be less than significant given the regulation of truck traffic on freeways according to State and Federal laws, and truck restrictions on local streets according to City municipal code (i.e., truck route enforcement) and no mitigation is necessary.

Land Use-Related Hazmat Risks. Both the Federal Government and the State of California require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials, to submit an HMBEP to the local Certified Unified Program Agency (CUPA). The CUPA with responsibility for the City of Moreno Valley is the County of Riverside Community Health Agency, Department of Environmental Health.² The HMBEP must include an inventory of the hazardous materials used in the facility, and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. The HMBEP must also include the Material Safety Data Sheet for each hazardous and potentially hazardous substance used. The Material Safety Data Sheets summarize the physical and chemical properties of the substances and their health impacts. The plan also requires immediate notification to all appropriate agencies and personnel of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information of all company emergency coordinators of the business, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel.

¹ California Department of Transportation, TSAR – Accident Summary 1/1/08-12/31/10.

² CUPA Directory Search, <http://www.calepa.ca.gov/CUPA/Directory/default.aspx>, website accessed April 24, 2012.

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HMBEPs are designed to be used by responding agencies, such as the Moreno Valley Fire Department, to allow for a quick and accurate evaluation of each situation for an appropriate response. HMBEPs are also used during a fire to quickly assess the types of chemical hazards that firefighting personnel may have to deal with, and to make decisions as to whether or not the surrounding areas need to be evacuated. Compliance with existing law will ensure that no significant impacts pertaining to the creation of hazards affecting the public will occur. The handling of hazardous materials in accordance with the HMBEP as required by applicable local, State, and Federal standards, ordinances, and regulations will ensure that impacts associated with environmental and health hazards related to an accidental release of hazardous materials are less than significant and no mitigation is required.

The Moreno Valley Fire Department will likely be first responders in the event of the release of hazard materials. The City of Moreno Valley contracts with the Riverside County Fire Department for fire services. The Riverside County Fire Department is administered and operated by the California Department of Forestry and Fire Protection (CalFire) per an agreement with the County of Riverside. The Fire Department has indicated it will need one or more fire stations in the area, and the project will mitigate impacts in this regard to less than significant levels (see Section 4.14, *Public Services and Facilities*).

Though the uses in the project area are not expected to utilize acutely hazardous materials in their daily operation, a potential for an accidental release of hazardous materials into the environment is present at the project site as it is at any commercial, retail, or industrial site. Compliance with the identified State and Federal transportation safety standards will govern the handling of hazardous materials during truck and freight transfer operations. These standards include procedures to contain, report, and remediate any accidental spill or release of hazardous materials. The handling of hazardous materials in accordance with all applicable local, State, and Federal standards, ordinances, and regulations will ensure that impacts associated with environmental and health hazards related to an accidental release of hazardous materials at the project site will be less than significant and no mitigation is required.

Hazardous On-site Facilities. The project site contains a regional natural gas compressor station operated by SDG&E. The Moreno Compressor Plant has been in operation for many years in the southeastern portion of the project area (see Section 4.16, *Utilities and Service Systems* and Section 4.5, *Biological Resources*). At present, the plant occupies a 19-acre site, surrounded by 174 acres of SDG&E-owned open space. There is additional open space around the plant, consisting of land owned by the CDFW as part of the SJWA. There are no plans to expand or otherwise modify the plant and/or its open space zone, which is considered adequate at this time to protect public health and safety, including users of the SJWA and new employees and users of the new warehouses associated with the WLCSP.

There will be sufficient setback from the plant to future warehouse uses (e.g., 1,000 feet). No development or change in operation has been announced for the property within the SJWA. Existing safety conditions will continue relative to the gas facility as it relates to the SJWA. Compliance with established safety laws and regulations regarding the natural gas facilities will reduce the potential impact to a less than significant level and no mitigation is required.

SCGC operates a natural gas metering station on a one-acre site located one-quarter mile north of the Moreno Compressor Plant. The land plan will provide 1,000 feet setback from the SCGC station as an additional setback between these uses. These setbacks appear sufficient to protect future uses/users within the WLCSP if upset conditions were to occur at this station. Compliance with established safety laws and regulations regarding natural gas plants is expected to reduce this potential impact to a less than significant level and no mitigation is required.

The site also contains two natural gas lines that cross the central and southern portions of the site in an east-west direction (Figure 3.17). They range in size from 16 to 36 inches in diameter and carry natural gas under medium and high pressure. The high pressure lines are managed by SDG&E while the moderate pressure lines are managed by SCGC. The utility companies that own and/or maintain these pipelines are responsible for the physical conditions of the pipelines. As development occurs in areas with buried natural gas lines, the project proponent will be required to negotiate with the involved utility provider as to whether these pipelines can be relocated or need to be protected in place. Future development is required to maintain clearance for pipelines depending on their contents and size, in consultation with the serving utility provider. As long as these design restrictions are implemented during the site design and construction process, no significant impacts are expected. However, if a catastrophic accident were to occur involving one or more natural gas lines on site, there could be property damage and loss of life. While the chance of occurrence is low, there are potential safety risks, mainly to project employees, if such an accident were to occur. Compliance with established safety laws and regulations regarding pipelines is expected to reduce this potential impact to a less than significant level and no mitigation is required.

Off-site Improvements. A number of off-site improvements will be needed to serve the project, including three reservoirs, various water, sewer, and drainage improvements within existing rights-of-way, and the SR-60/Theodore Street interchange. None of these facilities is expected to create significant hazards or risks to public health or safety. These facilities will require standard improvement plan approvals through the City of Moreno Valley and/or County of Riverside. Based on these plan reviews, no significant hazard-related impacts are expected and no mitigation is required.

Hunting Accidents. Based on comments received during the NOP/Scoping period, this section explores the possible hazards or risks that could result from stray gunfire from hunters on the adjacent SJWA property as a result of the proposed change in land use from dry-land farming to high-cube logistics warehouses. Immediately south of the project area is the SJWA, where limited hunting is permitted. Hunting in the area is generally pheasant hunting, but also includes waterfowl (such as ducks) as well as jackrabbits, rabbits and quail. Hunting in these areas requires a hunting license issued by the State. The Fish and Game Code provides strict regulations on hunting, including limits on hours, time of year, quantity, and firearms. Hunting on State lands, such as the SJWA, can only be done with shotguns that are smaller in size (higher in gauge) than 10-gauge shotguns. In addition, Federal law allows no more than three shells in the chamber of the shotgun at any given time during hunting. The SJWA is patrolled by CDFW wardens to ensure that all hunting rules and regulations are followed. The private hunt clubs are also governed by similar rules and regulations to ensure the safety of their members and the general public.

Given the proximity of the project area to the nearby hunting areas, it is appropriate to consider the possibility of stray gunfire as a possible risk to future employees, visitors, and facilities on the project site. Accident conditions that could arise from the nearby hunting activities are expected to be less than significant for the following reasons: the most intensive operations at the proposed high-cube logistics center would be during off-peak hours when there is no hunting; the hunting on the adjacent areas to the south of the WLC project area is in accordance with all applicable local, State, and Federal standards and regulations; and the range for the allowed firearms (shotguns smaller than 10-gauge) would be 60 yards or less providing a safe distance for development to occur in the WLC project area, which would be a safe distance from the actual hunting areas. It should also be noted that the Specific Plan provides for a minimum 250-foot setback along the southern boundary of the Specific Plan property, which is greater than the minimum safe distance described above.

Valley Fever. During processing of the Highland Fairview Corporate Park EIR, a local resident expressed concern regarding Valley Fever (*Coccidiomycosis*), a disease caused by fungus spores

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(*Coccidioides immitis*). Since the project site is adjacent to the Highland Fairview Corporate Park site, this issue will be addressed in this EIR as well. These fungal spores most typically lie dormant in relatively undisturbed soil with native vegetation cover in the Central Valley of California.

The likelihood of these spores to occur at this site is remote. The soil at the project site is not undisturbed and has little, if any, native vegetation cover. The site consists primarily of disturbed agricultural soils (i.e., regularly tilled and occasionally irrigated) and had virtually no native vegetative cover. The local soils will be extensively disturbed during grading and would be regularly watered to control dust. Erosion control measures will be implemented immediately following grading. Under these conditions, it is unlikely that *Coccidioides immitis* spores would survive in the soil. This potential impact appears minimal and no mitigation is required.

4.8.5.4 Located on a List of Hazardous Materials Sites

Threshold	Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?
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As detailed in the *Phase I Environmental Site Assessment Reports*, the project area is not listed in any of the searched regulatory databases provided by Environmental Data Resources (EDR). This included a review of Federal, State, and local environmental databases for information pertaining to documented and/or suspected contaminated sites, known handlers or generators of hazardous waste, waste disposal facilities, releases of regulated hazardous substances and/or petroleum products within specified search distances. Analysis of soil samples obtained during the limited site characterizations conducted as part of the Phase I ESAs, indicated there were trace concentrations of pesticides present in near surface soils at some of the sample locations. However, the pesticide concentrations were below the EPA’s Preliminary Remediation Goals, for residential properties. No further sampling was deemed necessary and unrestricted use of the property is warranted. Since neither the project site nor areas in the vicinity of the project site are listed on any of the hazardous materials sites as defined by Government Code Section 65962.5, there would be a less than significant impact and no mitigation is required.

4.8.5.5 Conflict with Emergency Response Plans

Threshold	Would the project impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation?
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The City of Moreno Valley adopted its Local Hazard Mitigation Plan (LHMP) on October 4, 2011. This document identifies known hazards throughout the community and identifies strategies for which to prepare for and respond to these hazards if and when it is necessary. Figure 12-2 of the LHMP maps primary and alternative evacuations routes out of Moreno Valley. There are three (3) routes that either run through or along the project area that are identified as primary evacuation routes: Redlands Boulevard, Theodore Street, and Alessandro Boulevard. The proposed project will be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate emergency access and evacuation will be provided. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Compliance with existing regulations for emergency access and evacuation will ensure that impacts related to this issue are less than significant and no mitigation is required.

4.8.5.6 Wildland Fire Risks

Threshold	Expose people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
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The City of Moreno Valley is subject to both wildland and urban fires. Wildfires in particular pose a threat to the northern and eastern portions of the City, near the WLC project area. Moreno Valley's LHMP documents that three wildland fires have occurred within the WLC project area since 2003. Although the project area is not within a mapped fire hazard area, the Badlands directly east of the project area are considered a High Fire Hazard Area.¹ Development of the eastern portion of the project could expose persons or property to wildland fire risks given the proximity of the project area adjacent to a High Fire Hazard Area. Regardless of this proximity, all new structures in the project area must be constructed in compliance with Title 24 of the California Code of Regulations to safeguard life and property from fire hazards, including the installation of automated fire suppression systems. Compliance with these standards would be enforced during building permit review and the construction inspection period. In addition, no development will be allowed within the San Jacinto Fault Zone, which runs parallel and just west of Gilman Springs Road; this area of limited development will provide a fuel or fire break to help protect future occupied uses within the WLCSP.

Six fire stations presently serve the City of Moreno Valley. Station No. 58, the Moreno Beach station, is the closest station to the project area (approximately a quarter of a mile directly west). Given the proximity of Station No. 58 and with all new structures constructed in compliance with Fire and Building Code regulations, the susceptibility and exposure of the project to wildland fires would be limited. **Mitigation Measures 4.14.2.6A** and **4.14.2.6B** in the Public Services and Facilities section will address potential impacts related to future fire protection services for this area. Implementation of these measures will help reduce potential wildland fire risks to a less than significant level, and no additional mitigation is required.

4.8.6 Significant Impacts

4.8.6.1 On-site Conditions Involving Hazardous Materials

Impact 4.8.6.1A: *Demolition of the existing on-site rural residential structures may involve hazardous materials (ACM and LBP) and possibly soil contamination from past agricultural chemical use.*

Impact 4.8.6.1B: *Demolition of the existing on-site rural residential structures may involve hazardous materials (LNG/CNG).*

Threshold	Would the proposed project create a significant hazard to the public through the routine transport, use, or disposal of hazardous materials?
-----------	--

Due to the suspected age of the rural residential structures on the site, it is possible that demolition of these structures may involve asbestos-containing materials (ACMs) and/or lead-based paint (LBP). Demolition of these structures may need to be supervised or conducted by contractors certified to remove and dispose of ACMs and/or LBP.

During the comment period on the DEIR, several commenters suggested there may be soil contamination on the WLC site, and evidence from the State Department of Toxic Substances Control (DTSC) indicates organo-phosphate based herbicide and pesticide materials may have been applied on or near the 7 existing rural residences on the site. Prior to grading, soil testing should be

¹ City of Moreno Valley General Plan, Final Program EIR, Section 5.5 Hazards, Figure 5.5-2.

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performed to determine if in fact these areas contain any significant levels of agricultural chemicals in the soil, and, if so, they should be remediated by a licensed contractor.

In addition, the Specific Plan proposes a liquefied natural gas/compressed natural gas (LNG/CNG) fueling station to be constructed on approximately 3,000 square feet somewhere in the eastern portion of the Logistics Development (LD) land use area of the Specific Plan. This LNG/CNG facility is referred to as “logistics support” in the Specific Plan land uses. It would provide natural gas to fuel heavy and light-duty trucks serving the project.

Since this facility would store natural gas under liquefied and compressed conditions, there is a potential for fire and/or explosion involving natural gas. Therefore, this is a potentially significant hazards impact requiring mitigation.

NOTE: The following changes were made based on the revised WLC Specific Plan.

Project or Specific Design Features. It is anticipated that the LNG/CNG fueling facility proposed in the LD zone will be constructed in Planning Area 7, in the northeastern portion of the project area.

The Specific Plan does not provide any design specifications for this facility. Eventually, the seven existing rural residences are developed into some industrial use consistent with the LL designation. Until they are all converted, it is possible the construction of an alternative fueling station in Planning Area 7 could be proximate to one or more rural residences. This is a potentially significant impact requiring mitigation (see Mitigation Measure 4.8.6.1B).

NOTE: The following mitigation measures have been revised in response to Comment F-7B-2 in letter F-7B from Lozeau Drury and Comment F-8-79 in Letter F-8 from Shute, Mihaly & Weinberger.

Mitigation Measures. Implementation of the following measure will ensure there will be no significant impacts from demolition of on-site buildings as a result of hazardous materials:

4.8.6.1A Prior to demolition of any existing structures on the project site, a qualified contractor shall be retained to determine if asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. If asbestos-containing materials and/or lead-based paint are present, prior to commencement of demolition, these materials shall be removed and transported to an appropriate landfill by a licensed contractor. In addition, onsite soils shall be tested for contamination by agricultural chemicals. If present, these materials shall be removed and transported to an appropriate landfill by a licensed contractor. This measure shall be implemented to the satisfaction of the Building Division including written documentation of the disposal of any asbestos-containing materials, lead-based paint, or agricultural chemical residue in conformance with all applicable regulations.

The following measure is proposed to help ensure that the LNG/CNG natural gas fueling facility proposed in the “logistics support” area of the Specific Plan is constructed in a safe location to protect public health and safety:

4.8.6.1B Prior to the issuance of any discretionary permits associated with the proposed fueling facility (“logistic support” site in the LD zone), a risk assessment or safety study that identifies the potential public health and safety risks from accidents at the facility (e.g., fire, tank rupture, boiling liquid, or expanding vapor explosion) shall be submitted to the City for review and approval. This study shall be prepared to industry standards and demonstrate that the facility will not create any significant public health or safety impacts or risks, to the satisfaction of the City Building and Safety Division and the Fire Prevention Bureau.

- 4.8.6.1C** Prior to grading for any discretionary permits for development in Planning Areas 9-12 adjacent to the natural gas compressor plant, the applicant shall prepare a risk assessment report analyzing safety conditions relative to the existing compressor plant and planned development. The report must be based on appropriate industry standards and identify the potential hazards from the compressor plant (e.g., fire, explosion) and determine that the distance from the plant to the closest planned buildings in Planning Areas 9-12 is sufficient to protect the safety of workers from accidents that could occur (see Final EIR Volume 2 Figure 4.1.6B) at the compressor plant. This measure shall be implemented to the satisfaction of the City Building and Safety Division and the Fire Prevention Bureau.
- 4.8.6.1D** Prior to the issuance of any grading permit, the developer shall inform the City of any existing solid waste materials within the development area. In conjunction with grading activities, all solid waste matter within the development area shall be removed by a licensed contractor and disposed of in an approved landfill. A record of the removal and disposal of any waste materials, in compliance with applicable laws and regulations, shall be submitted to the City prior to the issuance of any building permits.

Level of Impact After Mitigation. With implementation of **Mitigation Measures 4.8.6.1A** through **4.8.6.1D**, impacts associated with potential hazardous materials in existing rural residential structures or from the proposed natural gas fueling facility will be reduced to less than significant levels.

4.8.7 Cumulative Impacts

The cumulative impact analysis considers development of the proposed project in conjunction with other development in the City and this portion of Riverside County. Significant cumulative impacts associated with the routine transport, use, and disposal of hazardous materials would occur as the proposed project would increase the amount of truck traffic in the area as well as the number of trucks potentially transporting hazardous materials. The proposed project, in combination with other projects of a similar nature, has the potential to create a significant cumulative impact related to this issue. Some of these risks are site-specific and localized, such as businesses that handle hazardous materials within their facilities (i.e., on site); these types of hazmat impacts are generally limited to the project site. It is also possible there will be incrementally increased impacts by the transport and disposal of hazardous materials related to warehouse operations on the project site. For example, the substantial increase in trucks in and around the WLC site would incrementally increase the risks of accidents involving truck-related fuels (e.g., fire or explosion).¹ However, the number of trucks containing hazardous materials on the road in a given area at any given time would be difficult if not impossible to calculate, and it would be likewise difficult to estimate the number and/or location of accidental spills and leaks, which, by their nature, are accidental or unplanned occurrences, it would be impossible to predict the specific occurrence of such events on the project site. Despite these uncertainties, it is reasonable to assume that with an increase in vehicles transporting hazardous materials would incrementally increase the potential for accidents on a regional basis.

As anticipated in the City's General Plan, demographic increases, and the availability of vacant property in the City would lead to the new industrial development in the City and surrounding area. While the project-specific hazardous material impacts of individual development projects will be addressed separately in future CEQA documents, anticipated future development will contribute, through increases in population and the number of outlets that transport, or dispose of hazardous materials, to a cumulative increase in risk for hazardous material incidents. Although each project has unique hazardous materials considerations, it is anticipated that future cumulative projects would comply with the local, State, and Federal regulations and requirements as these are required for all

¹ *Statement added in response to Comment F-13-74 in Letter F-13 from the Sierra Club et al.*

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development projects. As a result, cumulative impacts associated with hazardous materials would be less than significant.

Cumulative impacts involving wildfires consists of future development adjacent to a High Fire Hazard Area. The risk to each future project is based on the location and interface between urbanized area and wildland areas. The risks associated with development in these area can only be reduced through conformance with Fire and Building Code regulations, it is anticipated that cumulative development within the project area would not create a significant and cumulative impact associated with wildland fire hazards.

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NOTE TO READERS. Various small revisions in this section have been made due to changes in the project description, related changes to the Draft Master Plan of Drainage Report, the Preliminary WQMP,¹ and in response to comments B-3-39 Letter B-3 from the California Department of Fish and Wildlife, and Comment B-6-5 from Letter B-6 from the Santa Ana Regional Water Quality Control Board.

4.9 HYDROLOGY AND WATER QUALITY

This section describes the hydrologic conditions on and adjacent to the project site and evaluates potential impacts to surface and groundwater resources associated with the proposed project.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The analysis contained in this section is based on the following technical studies prepared for the proposed WLC project:

- *Draft Drainage Report for World Logistics Center Specific Plan and Environmental Impact Import*, CH2M HILL, September 2014 (Appendix J-1 of this EIR).
- *Preliminary Project Specific Water Quality Management Plan for World Logistics Center Specific Plan*, CH2M HILL, September 2014 (Appendix J-2 of this EIR).
- *Water Supply Assessment Report for the World Logistics Center Specific Plan in Moreno Valley*, Eastern Municipal Water District, March 21, 2012 (Appendix M-1 of this EIR).

¹ FEIR Volume 2 Appendix J-1 and J-2).

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In addition to these project-specific technical studies, the analysis contained in this section is also based on the following reference documents:

- 2012 Water Quality Management Plan – A Guidance Document for the Santa Ana Region of Riverside County.
- 2011 Design Handbook for Low Impact Development Best Management Practices.
- 2009 California Stormwater Quality Association [CASQA] Construction Best Management Practices (BMP) Handbook, effective July 1, 2010.

A detailed discussion of jurisdictional waters and riparian/wetland impacts as it relates to the proposed WLC project is included in Section 4.4 (Biological Resources).

4.9.1 Existing Setting

The proposed project site is located in Rancho Belago in the eastern portion of the City of Moreno Valley in Riverside County. Geologically, the project area is located in the Peninsular Ranges Geomorphic Province of southern California, which extends southeastward from the San Bernardino and San Gabriel Mountains to the tip of the Baja California peninsula and is composed of alluvial deposits resulting from the erosion of nearby granitic mountain ranges.

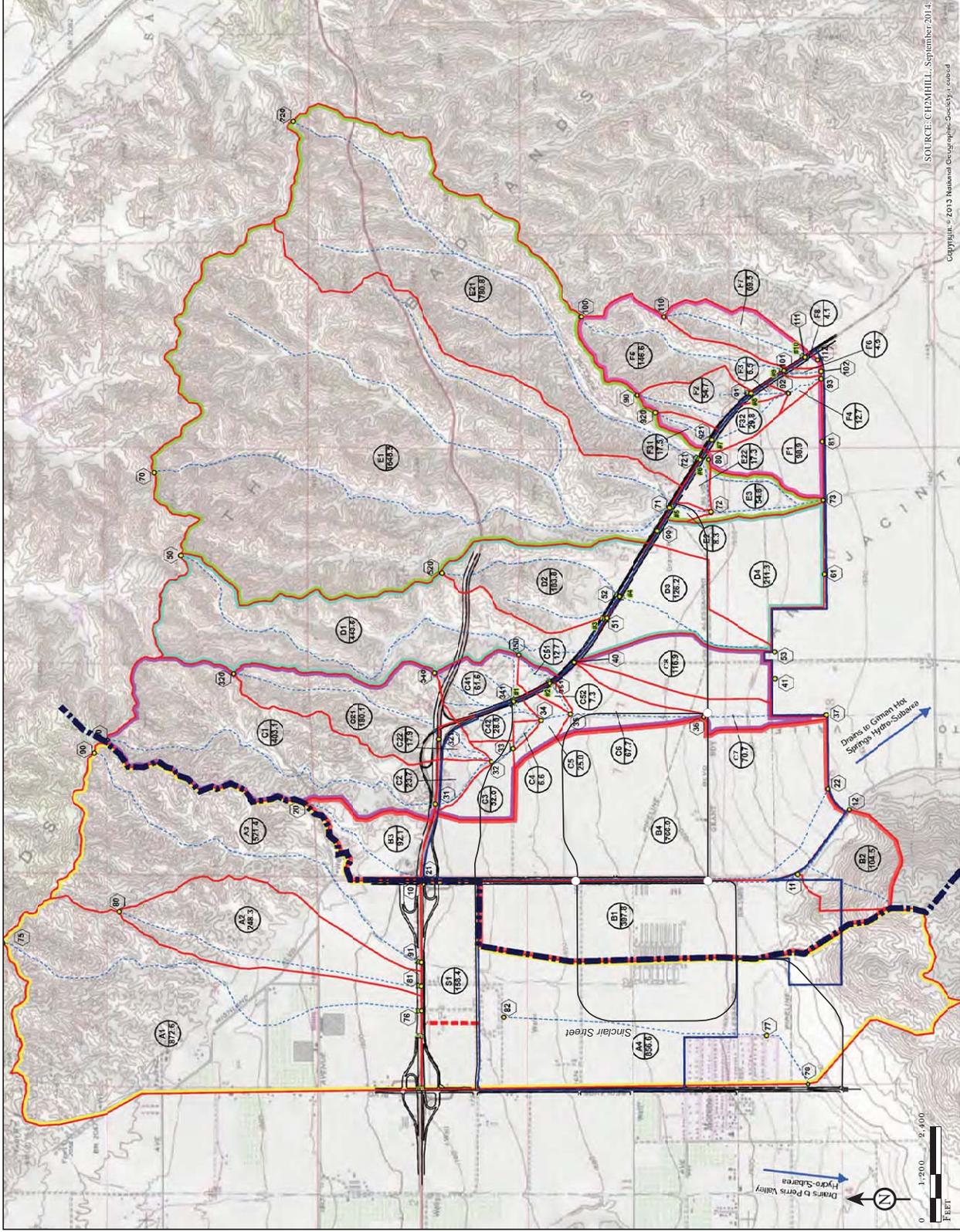
The project site is located in the Santa Ana River Basin, which includes the upper and lower Santa Ana River watersheds, the San Jacinto watershed, and several other small drainage areas. The Santa Ana region covers parts of southwestern San Bernardino County, western Riverside County, and northeastern Orange County. Of the approximately 2,610 acres within the project area, over 90 percent consists of dry-farmed agricultural fields.

NOTE: The following changes have been made in response to Comments B-3-38 in Letter B-3 from the California Department of Fish and Wildlife, B-6-5 in Letter B-6 from the Santa Ana Regional Water Quality Control Board, et al.

4.9.1.1 Drainage

The area is generally undeveloped with storm water runoff from the project area generally flowing in a southerly direction to the San Jacinto River. As illustrated in Figure 4.9.1, a topographic divide generally located west of Theodore Street separates storm water flows to the San Jacinto River in two directions. Runoff east of the divide flows through the San Jacinto Valley at a gradient ranging from 1 to 2 percent to the San Jacinto Wildlife Area (SJWA). Ultimately these flows drain to the Gilman Hot Springs Hydrologic Subarea (HSA). Runoff west of the divide flows to the Perris Valley Storm Drain at a gradient ranging from 1 to 2 percent. This runoff ultimately drains toward the Perris Valley HSA. Both the Gilman Hot Springs and Perris Valley HSAs eventually flow to the San Jacinto River, approximately 10 miles south of the project site. Flows are then conveyed through the San Jacinto River, Canyon Lake, again to the San Jacinto River (Reach 1), and ultimately to Lake Elsinore. In the event Lake Elsinore is at or beyond capacity, flows would continue through Temescal Creek, the Santa Ana River (Reaches 1–3), and then to the Pacific Ocean.

As illustrated in Figure 4.9.1, off-site flows tributary to the project area originate from the upstream foothill area known as the Badlands as well as a small portion of moderately developed area and open space. Flows from the upstream watershed collect in natural drainage courses and flow southerly across SR-60 and Gilman Springs Road through existing drainage culverts and onto the project site. These natural drainage courses are tributary to six (6) sub watersheds, named Watershed “A,” Watershed “B,” Watershed “C,” Watershed “D,” Watershed “E,” and Watershed “F” as



SOURCE: CHEMHIILL, September 2014.
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LSA FIGURE 4.9.1

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shown on Figure 4.9.1. As identified in the hydrology and drainage report prepared for the project, the tributary drainage area includes the drainage area north of SR-60. The project site receives flow from SR-60 and culverts crossing the freeway. The project drainage plan takes into account this flow entering the project site and appropriate mitigation to downstream drainage facilities is provided. The existing capacity of the SR-60 culverts and drainage systems will not be affected by the project since the project is located downstream of these facilities. The following paragraphs describe the natural drainage courses and existing conditions of each sub watershed and capacities of the existing culverts at the SR-60 and Gilman Springs Road.

Watershed “A”

Watershed “A” is located within Riverside County Flood Control and Water Conservation District (RCFCWCD) Moreno Master Drainage Plan (MMDP) area. RCFCWCD is currently preparing a revised MMDP. The MMDP indicates that storm flows north of SR-60 will be routed to the proposed Sinclair Basin and Quincy Basin. Flows released from the proposed basins will pass under SR-60 and be conveyed to MMDP Line “F.” Because it is unknown as to when these basins will be constructed, this study is prepared with the assumption that the basins are not in place prior to this project, and the offsite flows will be conveyed to MMDP Line “F” directly.

Downstream of SR-60 MMDP Line “F” is a 12-foot wide by 8-foot high reinforced concrete box (RCB) that conveys runoff from the existing culverts under SR-60: one triple 4-foot x 2-foot RCB, two double 48-inch corrugated metal pipe (CMP), one double 72-inch CMP, and one 42-inch reinforced concrete pipe (RCP) (with a 36-inch Riser). The capacity of the existing culverts are summarized in Table 4.9.A. Runoff north of SR-60, in excess of the capacities of the existing culverts, ponds north of SR-60 and flows towards the intersection of SR-60 and Redlands Boulevard. An existing 42-inch RCP conveys the runoff into the existing ditch along Redlands Boulevard. Since the 42-inch RCP does not have enough capacity to convey all of the offsite flows, the flows then sheet flow to the south. As a result, the interchange of SR-60 and Redlands Boulevard may be flooded. Ultimately the flows upstream of SR-60 will be less once RCFC&WCD constructs the master plan detention basins located north of SR-60.

Table 4.9.A: SR-60 Culverts

Culvert	Size/Material	Node	Capacity* (cfs)	100-year Flow (cfs)	Adequate to Convey 100-year flow
1	Triple 4' by 2' RCB	91	265	213	Yes
2	Double 48" CMP	76	250	715	No
3	Double 48" CMP	81	300	285	Yes
4	Double 72" CMP	81	805	557	Yes
5	42" RCP (36" Riser)		177	**	
Total			1797	1770	Yes

* Hydrology calculations based on a 100-year Water Surface Elevation of 1768.7 for all 5 culverts. ** Excess flows from Culvert 2 will pond at Culvert 2.

Source: Master Plan of Drainage Report, CH2MHILL, September 2014.

The outflow from Line “F” south of Eucalyptus Avenue sheet flows via a spreading area into the agricultural land downstream. Flows then sheet flow across the agricultural land to the southwest corner of the project at Alessandro Boulevard and Merwin Street. Flows leave the project boundary via a culvert under Alessandro Boulevard which outlets to an existing ditch, as shown on Figure 4.9.1.

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The capacity of the existing ditch south of Alessandro Boulevard was evaluated and varies from 75 cubic feet per second (cfs) to 390 cfs. Just south of the culvert at Alessandro Blvd, the existing ditch is trapezoidal with a depth of approximately 4 feet and capacity of 390 cfs. The capacity of the ditch is 75 cfs about 70 feet south of the Alessandro culvert where the ditch is 2 feet deep. The ditch capacity remains at 75 cfs with a depth of 2 feet until after it crosses Cactus Avenue. About 160 feet downstream of the culvert, the ditch transitions to a v-ditch 3 feet deep with a capacity of 165 cfs. The v-ditch extends southwest for approximately 100 feet and crosses Redlands Blvd. Flows unable to be contained in the ditch will overtop the ditch into the agricultural area on the east and along Merwin Street on the west. Flows will flow south in Merwin Street and turn west into the residential area. Further downstream, the runoff flows to the Greenbelt Channel located south of Cactus Avenue. The Greenbelt channel ultimately drains to the Perris Valley Storm Drain.

Watershed “B”

Watershed “B” drains a total of 1,361 acres, of which 92 acres is offsite flow from north of SR-60 and 104 acres is offsite flow at the southerly end of the project. The total onsite area is 1,165 acres, of which approximately 90 percent is pervious and 10 percent is impervious. The drainage area is divided into two sub areas by Theodore Street. Flows to the west of Theodore Street, consisting of 398 acres of onsite area and 104 acres of offsite area, drain to the ditch on the west side of Theodore street. The 92 acres of offsite area flows to the ditch along the east side of Theodore Street. Onsite flows on the east side of Theodore Street sheet flow in a southerly direction through the project area. The ditches are vegetated with bottom widths varying from 1 to 2 feet and depths varying from 1 to 3 feet. The existing capacity of the ditch at the project boundary is 55 cfs. Flows greater than 55 cfs will sheet flow through the project area and leave the project boundary in a sheet flow condition.

Watershed “C”

Watershed “C” drains a total of 1,061 acres, of which 658 acres is offsite flow from north of SR-60 and Gilman Springs Road. The total onsite area is 403 acres, of which approximately 90 percent is pervious and 10 percent is impervious. The drainage area is divided into two watershed areas. The majority of the watershed, 944 acres, drains to a watercourse which exits the project area. A small portion of onsite flow, 117 acres, sheet flows offsite. The natural drainage course in Watershed “C” is vegetated, with an average bottom width of approximately 3 feet and a depth of approximately 2 feet. The existing capacity of the drainage course is 165 cfs. Flows greater than 165 cfs will sheet flow across the area. The drainage course drains southerly through the project boundary.

Watershed “D”

Watershed “D” drains a total of 965 acres, of which 627 acres is offsite flow from north of Gilman Springs Road. The total onsite area is 338 acres, of which approximately 90 percent is pervious and 10 percent is impervious. The drainage area is divided into two sub watersheds. The majority of the watershed, 754 acres, drains to a watercourse which exits the project area. A portion of onsite flow, 211 acres, sheet flows offsite. The natural drainage course in Watershed “D” is also vegetated. Its bottom width varies from approximately 1 to 3 feet, and its depth varies from approximately 1 to 2 feet. The existing capacity of the drainage course is 65 cfs. Flows greater than 65 cfs will sheet flow across the area. The drainage course ends east of the existing gas facility. It is estimated that when significant storm events occur, the runoff ponds locally and eventually drains southwest.

Watershed “E”

Watershed “E” drains a total of 2,510 acres, of which 2,430 acres is offsite flow from north of Gilman Springs Road. The total onsite area is 80 acres, of which approximately 90 percent is pervious and 10 percent is impervious. The natural drainage course in Watershed “E” has a bottom width varying from approximately 20 to 30 feet and depths varying from approximately 10 to 15 feet. The majority of this

channel is vegetated, with a few locations of erosion. Approximately 1,500 feet north of the southerly project boundary, another natural drainage course confluences with the earthen channel forming a “V” shape junction. The junction is moderately eroded.

Watershed “F”

Watershed “F” drains a total of 445 acres, of which 288 acres is offsite flow from north of Gilman Springs Road. The total onsite area is 157 acres, of which approximately 90 percent is pervious and 10 percent is impervious. The drainage area is divided into four sub areas. The first sub area, 99 acres consists entirely of onsite flow which sheet flows off site. The second sub area drains 121 acres, of which 72 acres is offsite area. The third subarea drains 151 acres, including 146 acres of offsite area. The last sub area drains 74 acres, of which 70 is offsite area. The flow from these sub areas will ultimately drain to the San Jacinto Wildlife Area. The main natural drainage course in Watershed “F” is located approximately 500 feet west of Gilman Springs Road. The drainage course is vegetated, with bottom widths varying from approximately 5 to 10 feet, and depths varying from approximately 1 to 3 feet. The capacity of the existing water course is 70 cfs. The remaining flow sheet flows offsite.

These natural drainage courses in Watersheds “B” through “F” drain into the San Jacinto Wildlife Area downstream. The majority of the project site sheet flows through the project’s southerly boundary.

Existing Culverts along Gilman Springs Road

Within the project vicinity, there are ten (10) existing cross culverts located in Gilman Springs Road, as shown on Figure 4.9.2. Field visits by CH2M HILL staff found that most of the existing culverts were partially or completely blocked by sediment and debris allowing little flow from the culverts to enter the project site. In order to confirm if the existing culverts are sized appropriately to convey the offsite flow, the existing culvert capacities were analyzed using the inlet control capacity analysis chart. The results of the analysis are included in Appendix J of the DEIR, and summarized in Table 4.9.B. The analysis indicated that many of these culverts are undersized to convey the tributary 100-year flows even with proper maintenance, exclusive of culverts No. 2 and No. 7. Storm water unable to be conveyed by the culverts will flow to the existing ditches along the road, overtop the road and flow into the downstream natural drainage courses. The detailed flow patterns at these culverts were analyzed and summarized in Table 4.9.C and shown on Figure 4.9.2.

At Culvert No. 1, there is no existing ditch on either side of road. A total of 60 cfs offsite flow is tributary to the culvert, 20 cfs of the flow is conveyed through the 24-inch CMP, and 40 cfs overtops the road and flows to the natural drainage channel downstream. The impact to the downstream ditch is negligible due to the small amount of flow.

At Culvert No. 3, a total of 370 cfs flow is generated from offsite, 40 cfs is conveyed through the 36-inch CMP, and 330 cfs is conveyed along the existing ditch on the north side of the road, eventually flowing to Culvert No. 4.

At Culvert No. 4, a total of 170 cfs of flow comes from the offsite tributary area. One hundred (100) cfs is conveyed through the 48-inch CMP. The remaining 70 cfs combines with the 330 cfs of flow from Culvert No. 3 and 400 cfs overtops the road, draining to the natural channel downstream. The natural channel has a capacity of 365 cfs, therefore the flow will be spread beyond the top of bank.

At Culvert No. 5, a total of 1,370 cfs is generated from offsite, 370 cfs is conveyed through the 7-foot x 6-foot RCB, 52 cfs flow south within the existing ditch towards Culvert No. 6, and 938 cfs overtop the road draining to the natural channel downstream. The natural channel has a capacity of 330 cfs, the additional flow will overtop the channel at Alessandro Boulevard, and then sheet flow to the south.

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Table 4.9.B: Gilman Springs Road Culvert Capacity Analysis

Culvert	Size/Material	Node	100-yr Flow (cfs)	Culvert Capacity * (cfs)	Adequate to Convey the 100-year flow?
1	24" CMP	341	60	20	No
2	36" CMP	351	15	50	Yes
3	36" CMP	51	370	40	No
4	48" CMP	52	170	100	No
5	7'x6' RCB	71	1,360	370	No
6	4'x4' RCB	721	650	130	No
7	36" CMP	921	20	70	Yes
8	36" CMP	91	55	45	No
9	24" CMP	101	140	20	No
10	24" CMP	111	70	20	No

Note: see Figure 4.9.1 for the locations of existing culverts.

* Assuming culverts cleared of sediment and debris.

Source: Master Plan of Drainage Report, CH2MHILL, September 2014.

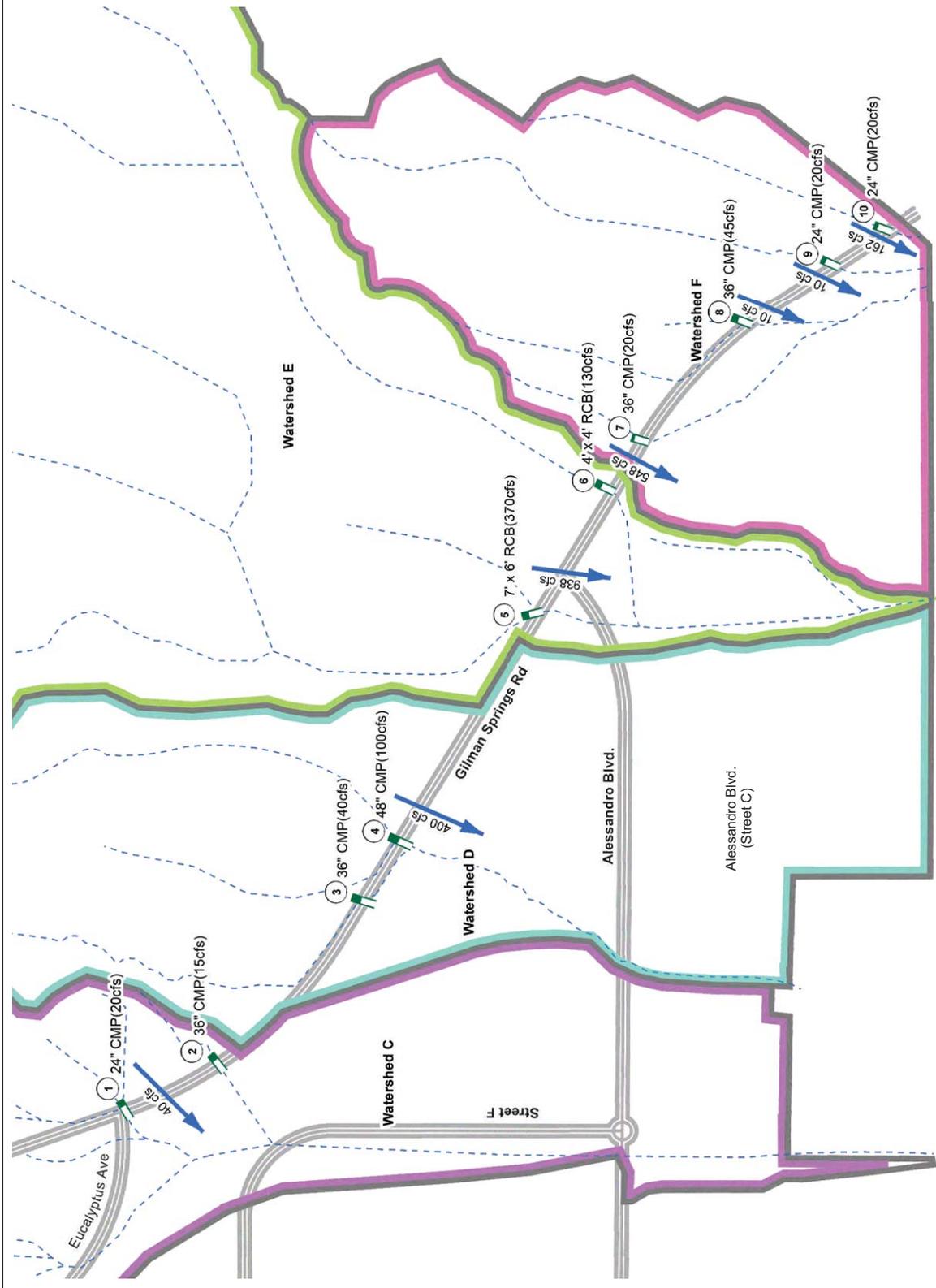
Table 4.9.C: Gilman Springs Road Flow Analysis

Culvert	Size/ Material	100-yr Flow (cfs)	Culvert Capacity ¹ (cfs)	Delta flow ² (cfs)	Flow in Ditch @ North Side of Road (cfs)	Flow @ South Side of Road (cfs)	Flow over Road (cfs)
1	24" CMP	60	20	40	—	—	40
2	36" CMP	15	50	—	—	—	—
3	36" CMP	370	40	330	330	—	—
4	48" CMP	170	100	400 ²	—	—	400
5	7'x6' RCB	1360	370	990	52	65	938
6	4'x4' RCB	650	130	572 ²	24	—	548
7	36" CMP	20	70	—	24	—	—
8	36" CMP	55	45	10	-	—	10
9	24" CMP	140	20	120	112	—	8
10	24" CMP	70	20	162 ²	—	6	162

¹ Assuming culverts cleared of sediment and debris.

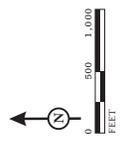
² Includes flow in ditch at north side of road from upstream culvert

Source: Master Plan of Drainage Report, CH2MHILL, September 2014.



- Roads
- Existing Culverts
- Natural Drainage Course
- Culvert No. (Size Capacity)
- Flow Overtopping Gilman Springs Road (Flow Rate)
- Watershed Boundary
- C
- D
- E
- F

Note: For the specific alignment of Alessandro Boulevard, see circulation Master Plan Figure 3.10.



LSA

FIGURE 4.9.2

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Gilman Springs Road
Culvert Flow Pattern

SOURCE: HE, 2014.

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At Culvert No. 6, with a total of 650 cfs offsite flow, 130 cfs is conveyed through the 4-foot x 4-foot RCB, and 24 cfs is conveyed along the existing ditch along the road. The remaining flow combines with the flow of 52 cfs from Culvert No. 5 and 548 cfs overtop the road flowing to the downstream channel. Due to the large amount of offsite flow and small capacity of the existing channel, the flow will overtop the existing Alessandro Boulevard.

At Culvert No. 8, with a total of 55 cfs offsite flow, 45 cfs is conveyed through the 24-inch CMP, and 10 cfs overtop the road draining to the downstream natural channel. The downstream channel has a capacity of 75 cfs. Therefore the excess flow will be contained within the natural channel.

At Culvert No. 9, with a total of 140 cfs offsite flow, 20 cfs flow is conveyed through the 24-inch CMP, 112 cfs is conveyed along the existing ditch on the north side of the street, and 8 cfs overtop the road and drain to the existing natural channel downstream. The channel has a capacity of 1,600 cfs; therefore the impact of 8 cfs is considered negligible.

At Culvert No. 10, with a total of 70 cfs offsite flow, 20 cfs are conveyed through the 24-inch CMP, the remaining 50 cfs combine with the 112 cfs flow from the upstream ditch which overtop the road, 6 cfs drains to the existing ditch on the south side of the road, and the remaining flows to the natural drainage channel downstream, which has a capacity of 1,000 cfs. When larger storm events occur, Gilman Springs Road may be flooded. Even with proper maintenance to remove the existing sediment and debris to operate at full capacities, there will be excessive offsite flow overtopping the road and entering the project site in a 100-year storm.

4.9.1.2 Water Quality

The project area is within Region 8 (Santa Ana Region) of the Regional Water Quality Control Board (RWQCB), which encompasses the watersheds of the Santa Ana and San Jacinto Rivers. The 24-mile long San Jacinto River flows into southern Moreno Valley from the San Jacinto Mountains, across the San Jacinto Valley, through a portion of the City of Moreno Valley, to Railroad Canyon Reservoir, and finally to its terminus in Lake Elsinore, southwest of Moreno Valley. Table 4.9.D identifies receiving waters that receive urban storm water runoff from the project area.

NOTE: The following changes have been made to in response to Comment F-7A-59 in Letter F-7A from Lozeau Drury.

Table 4.9.D: Receiving Waters from the Project Site

Receiving Water	303(d) List Impairments	Designated Beneficial Use	Proximity to RARE Use* Designation
San Jacinto River Reach 3 (Hydrologic Units 802.11, 802.14 and 802.21)	None	Intermittent: MUN, AGR, GWR, REC1, REC2, WARM, WILD	Approximately 2 miles to RARE designated San Jacinto Wildlife Area
Canyon Lake (Railroad Canyon Reservoir), San Jacinto River Reach 2 (Hydrologic Unit 802.11)	Nutrients, Pathogens	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not Rare
San Jacinto River Reach 1 (Hydrologic Units 802.32 and 802.31)	None	Intermittent: MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not Rare

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Table 4.9.D: Receiving Waters from the Project Site

Receiving Water	303(d) List Impairments	Designated Beneficial Use	Proximity to RARE Use* Designation
Lake Elsinore (Hydrologic Unit 802.31)	Nutrients, Organic Enrichment/ Low Dissolved Oxygen, PCBs (polychlorinated biphenyls), sediment toxicity Unknown Toxicity	MUN, REC1, REC2, WARM, WILD	Not Rare

* Rare, Threatened or Endangered Species (RARE) waters support habitats necessary for the survival and successful maintenance of plant or animal species designated under State or Federal law as rare, threatened, or endangered.
Source: *Preliminary Project Specific Water Quality Management Plan for World Logistics Center Specific Plan*, CH2MHILL, September 2014.

According to the Santa Ana Region Basin Plan, water quality in the project area is affected by a number of factors including but not limited to consumptive use, importation of water high in dissolved solids, runoff from urban and agricultural areas, and the recycling of water within the basin. In general, water quality in the Santa Ana Region becomes progressively poorer as water moves along hydraulic flow-paths. The highest quality water is typically associated with tributaries flowing from surrounding mountains and groundwater recharged by these streams. As indicated in the Preliminary Water Quality Management Plan (WQMP)¹ prepared for the proposed project, two receiving waters downstream of the project site are included in the most recent Federal Clean Water Act (CWA) Section 303(d) list of impaired water bodies. Canyon Lake is listed for pathogens and nutrients while Lake Elsinore is listed for nutrients, organic enrichment/low dissolved oxygen, polychlorinated biphenyls (PCBs), and unknown toxicity. As indicated in Table 4.9.D, each of the receiving waters has multiple designated beneficial uses. These designations provide a description of how the water is used and what beneficial purposes it serves. Table 4.9.E provides a description of each of these beneficial water uses.

Table 4.9.E: Beneficial Uses of Receiving Waters

Designated Beneficial Use	Description of Beneficial Use
Agricultural Supply (AGR)	Waters used for farming, horticulture, or ranching, including, but not limited to, irrigation, stock watering, and support of vegetation.
Groundwater Recharge (GWR)	Waters used for natural or artificial recharge of groundwater proposed for future extraction, maintenance of water quality, or halting of saltwater intrusion into freshwater aquifers.
Municipal and Domestic Supply (MUN)	Waters used for community, military, or individual water supply systems including, but not limited to, drinking water supply.
(RARE)	Waters support habitats necessary for the survival and successful maintenance of plant or animal species designated under State or Federal law as rare, threatened, or endangered.
Water Contact Recreation (REC1)	Waters used for recreational activities involving body contact with water where ingestion of water is reasonably possible. Uses include, but are not limited to, swimming, water-skiing, whitewater activities, fishing, and use of natural hot springs.
Non-contact Water Recreation (REC2)	Waters used for recreational activities involving proximity to water, but not normally involving body contact with water where ingestion of water is reasonably possible. Uses include, but are not limited to, picnicking, sunbathing, hiking, camping, boating, hunting, sightseeing, and aesthetic enjoyment.

¹ *Preliminary Project Specific Water Quality Management Plan for World Logistics Center Specific Plan*, CH2MHILL, September 2014.

Table 4.9.E: Beneficial Uses of Receiving Waters

Designated Beneficial Use	Description of Beneficial Use
Warm Freshwater Habitat (WARM)	Waters that support warm water ecosystems including, but not limited to, preservation and enhancement of aquatic habitats, vegetation, fish, and wildlife, including invertebrates.
Wildlife Habitat (WILD)	Water that support wildlife habitats including, but not limited to, the preservation and enhancement of vegetation and prey species used by wildlife, such as waterfowl.

Source: Water Quality Control Plan for the Santa Ana River Basin, 1995.

4.9.1.3 Water Sources

Water resources in the City and throughout Riverside County are sustained by substantial groundwater basins, which are used as reservoirs to store water during wet years. These underground reservoirs are tapped throughout the year according to the demand for water. Groundwater conditions in these basins are influenced by natural hydrologic conditions such as percolation of precipitation, groundwater seepage, and ephemeral stream flow within the watershed areas. The project site lies within the Perris North and San Jacinto Lower Pressure Management Zones of the West San Jacinto Groundwater Management Plan (Plan) area, which covers approximately 164,200 acres.¹ This Plan area is bounded by the San Jacinto Mountains on the east, the San Timoteo Badlands on the northeast, the Box Mountains on the north, the Santa Rosa Hills and Bell Mountain on the south, and unnamed hills on the west. Groundwater conditions in these basins are influenced by natural hydrologic conditions such as percolation of precipitation, groundwater seepage, and ephemeral stream flow within the watershed areas. Currently, the City does not identify any major groundwater recharge areas within the project site.²

4.9.1.4 Water Supply

The project area is located within the service boundary of the Eastern Municipal Water District (EMWD), which serves the eastern portion of the watershed in Riverside County. The EMWD has a 555-square mile service area that provides water for a population of about 630,000. Without easy access to an ocean outfall for effluent, the EMWD has developed into one of the State's largest reclaimed water providers, having a combined capacity from its five sewage treatment plants of more than 43 million gallons per day (mgd). Reclaimed water has become extremely important in managing local water resources, and helps extend potable supplies by substituting reclaimed water for potable water typically used by certain facilities (e.g., golf courses and landscape irrigation). The EMWD utilizes an aggressive program of developing local groundwater resources, including desalination, water harvesting, and additional storage of surplus imported and reclaimed water.

The EMWD adopted the West San Jacinto Groundwater Basin Management Plan (Plan) in June 1995. The Plan serves to protect the interests of existing groundwater producers and to provide a framework for new water supply projects within the 256-square mile Management Plan area. This plan encompasses more than 164,200 acres and includes the groundwater management zones, as well as essentially non-water bearing areas such as the Lakeview Mountains, the Bernasconi Hills

¹ The West San Jacinto Groundwater Management Plan identifies groundwater areas as "management zones" which may not match the area or configuration of subbasins.

² Section 5.7 *Hydrology/Water Quality*, City of Moreno Valley General Plan Final Program EIR, City of Moreno Valley, July 2006.

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around Lake Perris, the Double Butte area near Winchester, and areas in the extreme northern, western, and southern portions of the EMWD.¹

A Water Supply Assessment (WSA) was prepared for this project and approved by the EMWD on February 21, 2012, which indicated that water service to the project site will be provided by the EMWD and that the EMWD has the supplies available to provide water to the proposed project.

The water supply available to the EMWD in 2010 totals approximately 154,700 acre-feet (AF).² Water sources for the EMWD include imported water purchased from the Metropolitan Water District of Southern California (Metropolitan), groundwater sources, desalted groundwater, and recycled water from the EMWD's five regional water reclamation facilities. Imported water from Metropolitan is delivered in three ways: as potable water, as raw water and treated at two local EMWD filtration plants, or as raw water for non-potable use.

EMWD has four (4) sources of water supply: imported water purchased from MWD, local potable groundwater, local desalted groundwater and recycled water. Imported water accounts for approximately 65 percent, local potable groundwater is approximately 11 percent, desalted groundwater is 3 percent, and recycled water is 21 percent of supply (page 5, project WSA).

In June 2011, the EMWD adopted its *2010 Urban Water Management Plan (UWMP)*, which details the reliability of its current and future water supply. The document found that with all of its existing and planned supplies, the EMWD can meet 100 percent of projected supplemental demand through 2035, even with a repeat of a severe drought. In addition, the UWMP addresses conservation, local supplies and reliability of imported supplies. Table 4.16.A (q.v.) identifies EWMD's projected water supplies and demand.

The water supply demands of the proposed project have been assessed in the WSA and a determination was made that there is adequate water to serve the proposed WLC project. More information on this topic is provided in Section 4.16, *Utilities and Service Systems*, of the DEIR.

4.9.1.5 Storm Drain Infrastructure

The following revisions have been made in response to on Comment G-95-70 in Letter G-95 from Thomas Thornsley.

A portion of the project site is located within the Moreno Master Drainage Plan (MMDP) of the Riverside County Flood Control and Water Conservation District (RCFCWCD). The MMDP provides guidance for the construction of the master plan drainage system, and regional retention/detention basins. RCFCWCD is currently preparing a revised MMDP. The existing 12-foot wide by 8-foot high reinforced concrete box (RCB) east of Redlands Boulevard is owned by RCFCWCD and is designated as Line "F" in the MMDP. This facility conveys runoff from the existing culverts under SR-60 and through developed property to its current terminus immediately south of Eucalyptus Avenue. (Note: This RCB is located farther west than depicted on the MMDP to accommodate the existing logistics building south of SR-60.) The existing MMDP provides for storm flows north of SR-60 to be routed to the proposed Sinclair Detention Basin. Flows released from the proposed basin would pass under SR-60 through the existing culverts and be conveyed to the drainage systems identified as Line "F" in the MMDP.

¹ *West San Jacinto Groundwater Basin Management Plan 2010 Annual Report*, Eastern Municipal Water District, June 2011.

² An acre-foot covers one acre to a depth of one foot. An acre foot is approximately 326,000 gallons, which is enough to meet the needs of two average southern California households a year.

4.9.1.6 NOP/Scoping Comments

A number of residents and representatives of local conservation groups expressed concerns regarding impacts the project might have on local drainage, especially historic localized flooding, groundwater quantity and quality, and water quality, especially related to the San Jacinto Wildlife Area immediately south of the project site to serve as a transition area or buffer. Sections 4.9.5 and 4.9.6 of the DEIR thoroughly analyze these issues.

4.9.2 Existing Policies and Regulations

In the past, the effort to control the discharge of storm water has focused on managing the quantity of storm water (e.g., flood control) and only to a limited extent on managing the quality of storm water. In recent years, awareness of the need to improve water quality has increased. With this awareness, an extensive body of Federal, State, and local laws and regulatory programs has been established to pursue the goal of reducing pollutants contained in storm water discharges to waterways. The emphasis of these programs is to promote the concept and the practice of preventing pollution at the source, before it can cause environmental harm.

4.9.2.1 Federal Regulations

Clean Water Act. The CWA was amended in 1972 to prevent discharge of pollutants to waters of the United States from any point source unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The 1987 amendments to the CWA added Section 402(p), which establishes the NPDES, a permitting system for the regulation of discharges of any pollutant into waters of the United States. Regional Water Quality Control Boards (RWQCBs) administer this permitting program in California. In November 1990, the EPA published final regulations that establish application requirements for storm water permits. The regulations require NPDES permits for discharges of storm water from industrial/construction and Municipal Separate Storm Sewer Systems (MS4s). To comply with the permits, storm water pollution controls must be implemented for construction and industrial activity that discharges either directly to surface waters or indirectly through separate municipal storm drains. Pollution control is achieved by establishing engineering measures that have been designed, tested and successfully implemented throughout the past decades, such as detention basins and sediment traps, during both the construction period and the operational phases of a project.

Pursuant to the requirements of the State Water Resources Control Board (SWRCB), the NPDES General Permit No. CAS000002 applies to all construction activities that result in the disturbance of at least one acre of total land area, or activity which is part of a larger common plan of development of one acre or greater. General Permit No. CAS000002 is issued by the SWRCB as part of the Federal delegation responsibilities under this section of the CWA. The RWQCB regulates hydromodification¹ as well as surface and groundwater quality through adoption of water quality plans and standards, and issuance of water quality permits and waivers. The NPDES permit deals with both the construction phase and operational phase of development projects. For the construction phase of a project, the NPDES permit identifies the preparation of an SWPPP.

The implementation of NPDES permits ensures that the state's mandatory standards for the maintenance of clean water and the Federal minimum standards are met. Coverage under an NPDES permit regulates sedimentation and soil erosion through implementation of an SWPPP and periodic inspections by RWQCB staff. An SWPPP is a written document that describes the

¹ Hydromodification is the alteration of the hydrologic characteristics of coastal and non-coastal waters, which, in turn, could cause degradation of water resources.

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construction operator's activities to comply with the requirements in the NPDES permit. The SWPPP establishes a process whereby the operator evaluates potential pollutant sources at the site and implements Best Management Practices (BMPs) designed to prevent or control the discharge of pollutants in storm water runoff.

Storm water control measures during construction and grading will be outlined in the construction NPDES permit and SWPPP prepared for each proposed phase of the project. Examples of such BMP control measures include but are not limited to the following:

- Temporary detention basins for runoff and silt containment;
- Regular street-sweeping and truck washing prior to exiting construction areas;
- Covering of soil hauling trucks to minimize dust generation (and silt buildup on project roads);
- Dirt rockers at project exits to reduce soil transported out of construction areas;
- Monitoring of runoff and protection devices during storm events;
- Use of silt fencing, gravel bags, and/or straw bales to channel runoff to temporary basins; and
- Identification of emergency procedures in case of hazardous materials spills.

The project proponent will be required to obtain a construction NPDES permit prior to any site grading. In addition, the NPDES permit will require the identification of post-construction BMPs to be incorporated into the project WQMP and any subsequent site-specific WQMP. The WQMP identifies measures to control the post-construction entry of contaminants into storm flows.

In addition, pursuant to Section 404 of the CWA, the U.S. Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria, including a direct or indirect connection to interstate commerce. The USACE regulatory jurisdiction pursuant to Section 404 of the CWA is founded on a connection, or nexus, between the water body in question and interstate commerce. This connection may be direct (through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce) or may be indirect (through a nexus identified in the USACE regulations). The USACE typically regulates as non-wetland waters of the U.S. any body of water displaying an ordinary high water mark (OHWM). In order to be considered a jurisdictional wetland under Section 404, an area must possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic has a specific set of mandatory wetland criteria that must be satisfied in order for that particular wetland characteristic to be met. A project-specific discussion regarding Section 404 issues is provided in Section 4.4, *Biological Resources*, of this EIR.

National Flood Insurance Program. The National Flood Insurance Program (NFIP) is a relatively recent Federal program. The Federal government has been actively involved in flood control since 1927 following major floods on the Mississippi River. Beginning with the Flood Control Act of 1936, Congress assigned the USACE the responsibility for flood control engineering works and later for floodplain information services. Flood control was provided through the construction of dams and reservoirs. Despite these programs and rapidly rising Federal expenditures for flood control, flood losses continued to rise. In 1968, Congress passed the National Flood Insurance Act, which created the NFIP. The Flood Disaster Protection Act of 1973, which amended the 1968 Act, required the purchase of flood insurance by property owners who were located in special flood hazard areas and were being assisted by Federal programs, or by federally supervised, regulated, or insured agencies or institutions.

National Flood Insurance Program Reform Act of 1994. In 1994, the National Flood Insurance Program Reform Act went through its first major revision since its inception. Included in this revision were provisions that if a lender were to escrow an account and if the structure were in the floodplain, then the lender *must* escrow for flood insurance. The revised legislation also included increased flood insurance limits and the elimination of the 1962 buy-out program. However, the legislation did initiate the Hazard Mitigation Fund as part of the flood insurance policy. Also included in this legislation was the increase from a 5-day to a 30-day waiting period for a new policy to become effective. It also prohibits the waiver of flood insurance purchase requirements as a condition of receiving Federal disaster assistance. If the flood insurance policy were not maintained, in the event of another disaster, no disaster assistance would be made available for that structure.

Executive Order 11988, Floodplain Management. Executive Order 11988 requires the USACE to provide leadership and to take action to:

- Reduce the hazards and risk associated with floods;
- Minimize the impact of floods on human health, safety, and welfare; and
- Restore and preserve the natural and beneficial values of the current floodplain.

To comply with Executive Order 11988, the policy of the USACE is to develop projects that, to the extent possible, avoid or minimize adverse effects associated with use of the floodplain and that avoid development (or the inducement of development) in an existing floodplain unless there is no practicable alternative.

4.9.2.2 State Regulations

Porter-Cologne Water Quality Control Act. The California Water Code (CWC) is the principal state law regulating water quality in California. The CWC contains provisions regulating water and its use. This portion of the CWC, Division 7 (Porter-Cologne Act), establishes a program to protect water quality and beneficial uses of the State water resources and includes groundwater and surface water. The SWRCB is the principal State agency responsible for control of water quality. It establishes waste discharge requirements, water quality control planning and monitoring, enforcement of discharge permits, and ground and surface water quality objectives. It also prevents waste and unreasonable use of water, and adjudicates water rights.

Pursuant to requirements of the SWRCB, the NPDES Construction General Permit (CGP) No. CAS000002 applies to all construction activities that result in the disturbance of at least one acre of total land area, or activity which is part of a larger common plan of development of one acre or greater. The CGP is issued by the SWRCB as part of the Federal delegation responsibilities under Section 402 of the CWA. For all projects subject to the CGP, applicants are required to develop and implement an effective Storm Water Pollution Prevention Plan (SWPPP); to implement sediment, erosion, and pollution prevention control measures; and to obtain coverage under the CGP. The CGP separates projects into Risk Levels 1, 2, or 3. Risk Levels are determined during the planning and design phases, and are based on potential erosion and transport to receiving waters. Requirements apply according to the Risk Level determined.

The BMPs for this project contained in the Preliminary Water Quality Management Plan (PWQMP, see DEIR Appendix J) have been developed by the project engineers to address project-specific water quality impacts. See Section 4.9.2.3 for more information on the MS4 Permit System as it applies to the project. For additional information on the major BMPs recommended in the PWQMP prepared by CH2MHill for the project that are consistent with these regulations, see Section 4.9.6.2, *Construction-Related Water Quality Impacts*, and Section 4.9.6.3, *Operational Water Quality Impacts*.

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The BMPs for the project are described in Section 4.9.3.2 and 4.9.6.3 for treatment control BMPs, and in Section 4.9.6.2 for construction site BMPs.

California Fish and Game Code. The California Fish and Game Code has provisions to prevent unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life. The California Department of Fish and Wildlife (CDFW), through provisions of the California Fish and Game Code (§1601 through §1603), is empowered to regulate any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. The presence of a channel bed and banks, and at least an intermittent flow of water define streams (and rivers), is one of the most important factor in establishing CDFW jurisdiction. The CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by the CDFW. Discussion of jurisdictional waters and riparian/wetland resources is provided in Section 4.4, *Biological Resources*, of this EIR.

California Code of Regulations. The California Code of Regulations (CCR) contains administrative procedures for the State and the nine Regional Water Quality Control Boards (RWQCBs) in Title 23, and for water quality for domestic uses, wastewater reclamation, and hazardous waste management in Title 22.

Health and Safety Code. The Health and Safety Code provides for protection of ground and surface waters from hazardous waste and other toxic substances.

Groundwater Management Act (AB 3030) [Sections 10750–10756 of the California Water Code]. The availability of groundwater and issues involving the adequacy of recharge capability are regional in nature. The Groundwater Management Act¹ (AB 3030) provides a systematic procedure for an existing local agency to develop a groundwater management plan. AB 3030 allows a local agency whose service includes a groundwater basin that is not already subject to groundwater management pursuant to law or court order to adopt and implement a groundwater management plan and includes plans to mitigate overdraft conditions, control brackish water, and to monitor and replenish groundwater.

There are currently few domestic uses for groundwater in the project area as the City of Moreno Valley primarily relies upon imported water from the EMWD for domestic use. Water sources for the EMWD include imported water purchased from Metropolitan, groundwater sources, and recycled water from the EMWD's five regional water reclamation facilities. Approximately two thirds of the EMWD's water is imported from Metropolitan, with the remaining water supplied by groundwater wells.² Groundwater supplies are drawn from the EMWD wells located in the Hemet, San Jacinto, Moreno Valley, Perris Valley, and Murrieta areas.

Cobey-Alquist Flood Plain Management Act (California Water Code Section). This Act states that a large portion of land resources of the State of California is subject to recurrent flooding. The public interest necessitates sound development of land use, as land is a limited, valuable, and irreplaceable resource, and the floodplains of the State are a land resource to be developed in a manner that, in conjunction with economically justified structural measures for flood control, would result in prevention of loss of life and of economic loss caused by excessive flooding. The primary

¹ Sections 10750–10756 of the California Water Code.

² EMWD History and Mission, <http://www.emwd.org>, Eastern Municipal Water District, website accessed April 20, 2012.

responsibility for planning, adoption, and enforcement of land use regulations to accomplish floodplain management rests with local levels of government. It is policy of the State of California to encourage local government to plan land use regulations to accomplish floodplain management and to provide state assistance and guidance. As part of its discretionary review process, the City must determine how the project will comply with this Act and not create flooding impacts on new occupied land uses.

California Toxics Rule. On May 18, 2000, the State Environmental Protection Agency (CalEPA) promulgated numeric water quality criteria for priority toxic pollutants and other provisions for water quality standards to be applied to waters in the State of California. The CalEPA promulgated this rule based on the Administrator's determination that the numeric criteria are necessary in California to protect human health and the environment. The rule fills a gap in California water quality standards that was created in 1994 when a State court overturned the State's water quality control plans containing water quality criteria for priority toxic pollutants. Thus, the State of California has been without numeric water quality criteria for many priority toxic pollutants as required by the CWA, necessitating this action by CalEPA. These Federal criteria are legally applicable in the State of California for inland surface waters, enclosed bays, and estuaries for all purposes and programs under the CWA.

4.9.2.3 Local Regulations

Municipal Separate Storm Sewer System (MS4) Permit System. The City of Moreno Valley is a co-permittee under the NPDES MS4 Permit No. CAS 618033, adopted on January 29, 2010. The NPDES MS4 permit is intended to regulate the discharge of urban runoff from the MS4 within Riverside County. Under the NPDES MS4 permit, the City is responsible for the management of storm drain systems within its jurisdiction. Cities are required to implement management programs, monitoring programs, implementation plans, and all BMPs outlined in the Riverside County Water Drainage Area Management Plan (DAMP) and Riverside County Water Quality Management Plan for Urban Runoff (WQMP). The current approved WQMP, dated October 22, 2012, addresses the 2010 MS4 NPDES permit.

Projects identified as a 'Priority Development Project' will be required to prepare a Project-Specific WQMP. The 2010 MS4 Permit mandates a Low Impact Development (LID) approach to storm water treatment and management of runoff discharges. The project site should be designed to minimize imperviousness, detain runoff, and infiltrate, reuse or evapotranspire runoff where feasible. LID BMPs should be used to infiltrate, evapotranspire, harvest and use, or treat runoff from impervious surfaces, in accordance with the Design Handbook for Low Impact Development Practices. The project must ensure that runoff does not create a hydrologic condition of concern. The RWQCB continuously updates impairments as studies are completed. The most current version of impairment data will be reviewed and implemented prior to the preparation of Preliminary and Final Project-Specific WQMPs for future phases of the project. As part of its discretionary review process, the City must ensure that each phase of the project complies with the MS4 requirements.

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The MSHCP is an element of the Riverside County Integrated Project (RCIP), which is an integration of land use, transportation, and conservation planning and implementation to develop a consensus for the future development of Riverside County. The MSHCP is designed to protect over 150 species and conserve over 500,000 acres of land in western Riverside County. The MSHCP was adopted in 2003 and is being implemented specifically to address the direct, indirect, cumulative, and growth-related effects on covered species resulting from build out of planned land use and infrastructure, including the proposed project. The MSHCP involves efforts by the county, State, and Federal governments, the

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fourteen cities in western Riverside County, and private and public entities engaged in construction activities that potentially affect the species covered under the MSHCP. The plan specifies an obligation of local projects, both public and private, to mitigate their impacts on species. The MSHCP includes incentives for conservation or the purchase of properties from willing sellers and will eventually result in a Conservation Area in excess of 500,000 acres, focusing on conservation of 150 species. The MSHCP Conservation Area includes approximately 347,000 acres of existing Public/Quasi-Public Lands and approximately 153,000 acres of Additional Reserve Land. The MSHCP requires a proposed development project to evaluate any impacts to riparian or riverine resources on the project site, as well as what is referred to as the “urban/wildlands interface” when present. This analysis includes design features and measures related to drainage features, toxics, lighting, noise, invasive plants, barriers, and grading/land development.

The MSHCP requires new development to determine if a project site contains riparian or riverine resources/processes prior to development. If they are present, the MSHCP requires projects to protect these resources to the extent possible with creative project design, setbacks, etc. If such resources, or any other important resources identified in the MSHCP will be affected by development, the developer is required to submit a Determination of Biologically Equivalent or Superior Preservation (DBESP) report indicating how impacts to these resources will be mitigated or compensated for by the developer. For more information on the MSHCP and DBESP processes, see Section 4.4, *Biological Resources*.

4.9.2.4 City of Moreno Valley General Plan Policies

The following General Plan objectives, policies, and programs are applicable to the proposed project:

Objectives, Policies, and Programs

- Objective 6.2** Minimize the potential for loss of life and protect residents, workers, and visitors to the City from physical injury and property damage, and to minimize nuisances due to flooding.
- Policy 5.5.11** Implement National Pollutant Discharge Elimination System Best Management Practices relating to construction of roadways to control runoff contamination from affecting water resources.
- Objective 7.2** Maintain surface water quality and the supply and quality of groundwater.
- Program 7-2** Advocate for natural drainage channels to the Riverside County Flood Control District, in order to assure the maximum recovery of local water, and to protect riparian habitats and wildlife.
- Policy 7.4.3** Preserve natural drainage courses in their natural state and the natural hydrology, unless the protection of life and property necessitate improvement as concrete channels.

NOTE: The following changes have been made in response to Comment F-13-32 in Letter F-13 from Johnson & Sedlack on Behalf of Sierra Club, Moreno Valley Group & Residents for a Livable Moreno Valley.

Ultimate Goals

- VII Emphasizes public health and safety, including, but not limited to, police, fire, emergency and animal services and protection from floods and other hazards.

4.9.3 Methodology

Evaluation of hydrology and water quality impacts associated with the proposed project includes the following:

- Determine the construction phase water quality impacts based on NPDES standards;
- Determine the construction impacts on drainage patterns and drainage capacity;
- Determine the operational water quality impacts based on NPDES standards;
- Determine the operational impacts on drainage patterns and drainage capacity; and
- Determine the impacts on local groundwater table levels.

A PWQMP (included as Appendix J-2 of this EIR) has been prepared for the proposed project and evaluates impacts associated with operational activities. Drainage pattern and capacity impacts were evaluated by calculating existing and proposed flow condition rates using the rational method in accordance with the methods described in the Riverside County Flood Control and Water Conservation District Hydrology Manual. The peak 100-year storm runoff was utilized to preliminarily size storm drain pipes as indicated in the Draft Drainage Report conducted for this project (Appendix J-1 of this EIR).

Due to the land use change associated with the land development, a number of drainage systems are proposed to mitigate the changes of hydrologic characteristics of the watershed. The design guidelines for this project are in accordance with RCFCWCD requirements and City of Moreno Valley guidelines. The design guidelines and local flood protection requirements are summarized as the following:

- Drainage facilities shall be designed in accordance with the Riverside County Hydrology Manual and Design Manual Standard Drawings. The drainage systems shall be designed to provide 100-year level of flood protection through a combined hydraulic conveyance of the underground storm drains and detention basins;
- Proposed drainage systems, which are connecting to the existing downstream facilities, shall be designed properly so the proposed discharge does not exceed the existing discharge to the downstream facilities; and
- Provisions for maintenance and/or easement shall be incorporated in the proposed drainage systems.

4.9.3.1 Pollutants of Concern and Assessment Methodology

The pollutants of concern for the water quality analysis have been identified based on the previously described regulations and the pollutants identified by regulatory agencies that potentially could be generated by the proposed project. The potential pollutants associated with the project are reflected in Table 4.9.F. Table 4.9.G describes these pollutants (bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash & debris, and oil & grease) and their general impact on water quality and aquatic habitat.

The project's priority pollutants of concern are defined as the pollutants associated with the project that are also present in impaired receiving waters. Based on the WQMP prepared for the proposed project, impaired receiving waters downstream from the project include Canyon Lake and Lake Elsinore. Canyon Lake is impaired for nutrients and pathogens, and Lake Elsinore is impaired for nutrients, organic enrichment/low dissolved oxygen, PCBs, and unknown toxicity. Therefore, the priority pollutants of concern for this project include pathogenic indicators, nutrients, pesticides, and toxic organic compounds.

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Table 4.9.F: Anticipated and Potential Pollutants Generated by Land Use Type

Priority Project Categories	General Pollutant Categories							
	Bacterial Indicators	Metals	Nutrients	Pesticides	Toxic Organic Compounds	Sediments	Trash & Debris	Oil & Grease
Commercial/Industrial Development	P ³	P	P ¹	P ¹	P ⁵	P ¹	P	P
Parking Lots (>5,000 ft ²)	P ⁶	P	P ¹	P ¹	P ⁴	P ¹	P	P
Retail Gasoline Outlets	N	P	N	N	P	N	P	P

P = Potential
 N = Not Potential
¹ A potential pollutant if non-native landscaping exists or is proposed onsite; otherwise not expected.
² A potential pollutant if the project includes uncovered parking areas; otherwise not expected.
³ A potential pollutant if land use involves animal waste.
⁴ Specifically petroleum hydrocarbons.
⁵ Specifically solvents.
⁶ Bacterial indicators are routinely detected in pavement runoff
 Source: *Preliminary Project Specific Water Quality Management Plan for World Logistics Center Specific Plan (2014)*

Table 4.9.G: Pollutants and General Water Quality Impacts

Pollutant	Water Quality Impact
Bacterial Indicators	May result in water body impairments, can exceed public health standards for water contact recreation, creating a harmful environment. Can alter the aquatic habitat and create a harmful environment for aquatic life.
Metals	Bio-available forms of trace metals are toxic to aquatic life, potential of groundwater contamination, bio-accumulation in aquatic life, affect beneficial uses of a water body.
Nutrients	Elevated nutrient levels in surface waters cause algal blooms, excessive vegetative growth, and dissolved oxygen levels, which is detrimental to aquatic life.
Pesticides	Elevated levels can indirectly or directly constitute a hazard to life or health. During cleaning activities, these compounds can be washed off into storm drains creating runoff containing toxic levels of the pesticides active component. Dirt, grease, and grime may adsorb concentrations that are harmful or hazardous to aquatic life.
Toxic Organic Compounds	May contain levels that are harmful or hazardous to aquatic life.
Sediments	Excessive sediment can be detrimental to aquatic life by interfering with photosynthesis, respiration, growth, and reproduction.
Trash and Debris	Detrimental effect on recreational value of a water body and aquatic habitat; interferes with aquatic life respiration and can be harmful or hazardous to aquatic animals that mistakenly ingest floating debris.
Oil and Grease	Can accumulate in aquatic life from contaminated water, sediments, and food and are toxic at low concentrations. Can persist in sediments for long periods of time and result in adverse impacts on the diversity and abundance of existing bio-communities and can affect the aesthetic value of a water body.

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4.9.3.2 Treatment Control BMPs and Assessment Methodology

The treatment control BMP strategy is to select Low Impact Development (LID) BMPs that promote infiltration and evapotranspiration, including infiltration basins, bioretention facilities, and extended detention basins. Generally infiltration BMPs have advantages over other types of BMPs, including reduction of the volume and rate of runoff, as well as full treatment of all potential pollutants potentially contained in the storm water runoff. It is recognized however that infiltration may not be feasible on sites with low infiltration rates, or located on compacted engineered fill. If the BMP is considered in a fill condition, and the infiltration surface of the BMP cannot extend down into native soils, or if the BMP is considered in a cut condition, and there is no practicable way to verify infiltration rates at the final BMP elevation, infiltration BMPs will not be used. Prior to final design of each phase of the project, infiltration tests shall be performed within the boundaries of the proposed infiltration BMP and at the bottom elevation (infiltration surface) of the proposed infiltration BMP to confirm the suitability of infiltration. In situations where infiltration BMPs are not appropriate, bioretention and/or biotreatment BMPs (including extended detention basins, bioswales, and constructed wetlands) that provide opportunity for evapotranspiration and incidental infiltration will be considered. Harvest and use BMPs will also be considered as a treatment control BMP to store runoff for later non-potable uses.

Proprietary BMPs combined with traditionally accepted BMPs may assist with the treatment of project pollutants. Proprietary BMPs combined with traditionally accepted BMPs may be employed on a site-specific basis as approved by the City of Moreno Valley. The appropriate BMP(s) for each phase of the project will be determined based on the size of the project area, the types of pollutants that would be found in the development runoff, and pollutants of concern. Table 4.9.H describes these BMPs (infiltration basins, biofilters, detention basins, water quality inlets, and hydrodynamic separators) and their general characteristics.

Table 4.9.H: BMP Characteristics

BMP	General Characteristics
Biofilters	Includes grass swales, grass strips, wetland vegetation swales, and bioretention. Pollutants are removed by bioretention or biofiltration, and provide opportunity for evapotranspiration and incidental infiltration.
Water Quality Inlet	Pollutants are removed through sedimentation and separation as the design flow passes through one or more chambers. Generally used for pretreatment before discharging into another type of BMP.
Extended Detention Basin	Basin sized to detain and slowly release the design volume of urban runoff, allowing particles and associated pollutants to settle out. Maintenance efforts would need to be directed toward vegetation management, vector control, and removal of debris accumulations.
Infiltration Basins	Basin sized to detain and infiltrate runoff, allowing particles and associated pollutants to settle out. Maintenance efforts would be directed toward vegetation management, vector control, and removal of debris accumulations. This BMP may require groundwater monitoring.
Hydrodynamic Separator System	Device treats storm water by creating a whirlpool of water within a concrete chamber in which solids fall to the bottom of the chamber while buoyant debris, oil, and grease rise to the surface, allowing water to pass through a flow control opening.

4.9.4 Thresholds of Significance

The following thresholds of significance regarding potential impacts to hydrology and water quality are based on *CEQA Guidelines* (2012). A project would have a significant impact on surface hydrology, water quality, and/or groundwater if it would:

- Result in violations of any water quality standards or waste discharge requirements of the City of Moreno Valley or the Regional Water Quality Control Board;

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- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation on site or off site;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff which would result in on-site or off-site flooding;
- Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or
- Expose people or structures to inundation by seiche, tsunami, or mudflow.

4.9.5 No Impacts/Less than Significant Impacts

The following potential impacts were determined to be less than significant. In each of the following issues, either no impact would occur (therefore, no mitigation would be required) or adherence to established regulations, standards, and policies would reduce potential impacts to a less than significant level.

4.9.5.1 Seismic Flooding-Related Impacts

Threshold	Would the project expose people or structure to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?
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The project site and the off-site improvement areas are not identified as being located within the City's mapped inundation area;¹ therefore, the proposed project would not result in the exposure of people or structures to risk of loss, injury, or death involving flooding as a result of failure of either the Poorman Reservoir (Pigeon Pass Dam) or Lake Perris Dam. Impacts related to this issue would be less than significant, and no mitigation is required.

4.9.5.2 Seismic-Related Impacts

Threshold	Would the project expose people or structure to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow?
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¹ Figure 5.5-2 Floodplains and Fire Hazard Areas, City of Moreno Valley General Plan Final Program EIR. July 2006.

A tsunami is a series of waves generated in a body of water by a pulsating or abrupt disturbance that vertically displaces water. Seiches are oscillations in enclosed bodies of water that are caused by a number of factors, most often wind or seismic activity. Lakes in seismically active areas such as Lake Perris are at risk from seiches. A mudslide (also known as a mudflow) occurs when there is fast-moving water and a great volume of sediment and debris that surges down a slope, stream, canyon, arroyo, or gulch. Mudslides are similar to flash floods and can occur suddenly without time for adequate warning. Mudflows can ruin substantial improvements with the force of the flow itself and the burying or erosion of improvements by mud and debris.

The project area is not at risk of inundation by a tsunami as it is located approximately 56 miles from the Pacific Ocean. The project area is located approximately 2.5 miles northeast of Lake Perris. Lake Perris is an enclosed body of water and could be subject to a seiche during a seismic event. However, a seiche event would not affect the project area because water levels in the lake are not high enough to overtop the Perris Dam in the event of a seiche.¹ The Perris Dam has been designed to prevent seiche phenomena due to the region's high seismicity. In addition, the topography between the Specific Plan area and Lake Perris has multiple hills and valleys. Given these factors, impacts associated with seiche events are less than significant for the proposed WLC project.

Except for the far southwest corner, the project site is located in a gently sloping area where landslides and mudslides would not occur. No development is proposed on the steep slopes of Mount Russell in the southwesterly portion of the property, which is included in the 74.3 acres of open space designated within the WLCSP other than the eastern extension of Cactus Avenue. Therefore, a less than significant impact associated with landslides, rockfalls, or mudslides would occur, and no mitigation is required.

4.9.5.3 Groundwater

Threshold	Would the proposed WLC project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level?
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Based on the WSA prepared for the proposed project by the EMWD, water demand for the proposed on-site uses would total approximately 1,991.25 acre-feet per year (AFY).² The EMWD considers this a worst-case estimate based on the total acres and amount of square footage of high cube logistics uses proposed by the project. This estimate does not take into account the proposed project landscaping design with xeriscape drought-tolerant landscaping and on-site collection of runoff and channeling it to landscaped areas to minimize irrigation on the interior of the project site. Thus, the water demand analysis conducted by the EMWD and in this EIR is somewhat conservative in its estimate of the actual water usage of the proposed project as it builds out. For the purposes of analysis in this EIR, the EMWD's estimate of 1,991 AFY figure will be used relative to water consumption.

As identified in Section 4.16, *Utilities and Service Systems*, of this EIR, the proposed project will obtain water service from the EMWD. It is anticipated that the proposed project would primarily utilize imported water purchased from Metropolitan. In the event that the supply of imported water is

¹ The existing earthen wall is approximately 128 feet high with the highest elevation at 1,628 feet. Normal operating water levels for Lake Perris are at 1,588 feet (leaving 40 feet of excess height between the water level and the top of the dam). Restricted operating water levels for Lake Perris are at 1,563 feet (leaving 65 feet of excess height between the water level and the top of the dam).

² *Water Supply Assessment Report for the World Logistics Center Specific Plan in Moreno Valley*, Eastern Municipal Water District, March 21, 2012.

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reduced, it would be supplemented with new local supply projects during multiple dry years, if needed.

The WSA prepared for the proposed project indicates that development of the project will not include groundwater for water supply. Rather, this project, as well as other new developments in the EMWD's service area, will be supplied exclusively with imported water provided by MWD. The imported water may be treated by MWD, provided by Metropolitan as untreated water and subsequently treated by the EMWD, or recharged into the basin for later withdrawal.

NOTE: The following changes were made in Responses to Comments F-5-10 and F-5-23 in Letter F-5 from the Inland Empire Waterkeeper.

The proposed project will not substantially interfere with groundwater recharge due to the project implementation of bioretention areas and detention basins with infiltration capacity that mitigates the impact of reduced pervious areas. Bioretention areas and detention basins will be implemented in addition to the remaining impervious areas. The only use of groundwater may be to support continued agriculture on portions of the WLCSP property that have not yet been developed. The EMWD developed the West San Jacinto Groundwater Basin Management Plan to help ensure that local groundwater resources are conserved and groundwater overdraft does not occur, based on projections of future growth and expected water supply conditions. The Plan projects the water consumption demands of existing and future development based on rates of growth assumed by regional planning organizations (i.e., SCAG and WRCOG) and estimates water demand versus available supply under different water supply scenarios (e.g., multiple dry years).

The Specific Plan requires future development to minimize water use by installing drought-tolerant landscaping (Specific Plan Section 4.2, Offsite Landscaping, and Section 5.4, Onsite Landscaping), by designing buildings and hardscape areas to capture and reuse water on-site for landscape irrigation (Specific Plan Section 5.4, *On-Site Landscaping*), and installing water-conserving building fixtures such as sinks, toilets, etc. (Specific Plan Section 6.0, *Sustainability*).

State Water Supply Reliability. Based on the Water Allocation analysis released by the California Department of Water Resources (DWR) on March 22, 2010, export restriction could reduce Metropolitan deliveries by 150 to 200 thousand acre-feet (TAF) under mean hydrologic conditions, and operations could remain restricted until a long-term solution is found to improve the stability of the Bay-Delta region.

The State Water Project (SWP) and Central Valley Project (CVP) are the responsible partners for operation of the DWR and Bureau of Reclamation (Reclamation), respectively. In November 1986, DWR and Reclamation signed the Coordinated Operations Agreement (COA). The COA was subsequently authorized and approved by the California State Legislature and Congress. Under COA, DWR and Reclamation agree to operate the SWP and CVP in a balanced manner to coordinate releases from upstream reservoirs and unregulated flows to meet Sacramento Valley in-basin and in-Delta uses, including water quality standards established by the SWRCB.

Reclamation, as a Federal agency is required to consult with National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Federal Endangered Species Act (FESA) to determine if a Federal action that they authorize, fund, or implement could jeopardize the continued existence of a listed species in the wild, or destroy or modify the species' critical habitat. Because the SWP and CVP are operated in a balanced manner, the findings under Section 7 of the FESA affect operations of both the SWP and CVP.

The initial biological opinions related to long-term operations of the SWP and CVP were issued in 1993 by NMFS for protection of the winter-run Chinook salmon and by USFWS for protection of delta

smelt. Operations of the SWP and CVP were modified to reduce potential adverse impacts to these species primarily through:

- 1) Increased storage volumes of water in upstream reservoirs to provide adequate flows with appropriate temperatures for the winter-run Chinook salmon and adequate flows in the Delta for both species;
- 2) Flows released from upstream reservoirs to provide adequate in-Delta flows and Delta outflows for these species; and
- 3) Modification of periods of time when water can be diverted at the SWP and CVP south Delta intakes to reduce the potential for reverse flows, reduce the potential for high salinity in the south Delta, and reduce the potential for entrainment and entrapment of fish in the SWP and CVP south Delta intake facilities.

The biological opinions were modified as DWR and Reclamation modified operations of the SWP and CVP and new information related to aquatic resources became available. During this period, NMFS redesignated the Sacramento River winter-run Chinook salmon as “endangered” and designated two species as “threatened” (i.e., Central Valley spring-run Chinook salmon and Central Valley steelhead). Therefore, the consultations under Section 7 of the FESA were modified and new biological opinions were issued between 2000 and 2004. In 2005, the Department of the Interior was sued with respect to the 2004 biological opinion issued by USFWS. Subsequently, USFWS re-issued the biological opinion in 2005; however, the Department of the Interior was sued in 2005 with respect to the reissued biological opinion. The 2005 USFWS biological opinion was invalidated and the United States District Court for the Eastern District of California (the Court) ordered a new biological opinion and issued interim operations orders to protect delta smelt until a new biological opinion could be issued in 2008. The interim operations criteria included limitations for operation of the SWP and CVP south Delta intakes to protect delta smelt.

In response to these actions, Reclamation requested consultation with USFWS and NMFS in August 2008 with respect to the coordinated long-term operation of the SWP and CVP. In December 2008, the USFWS issued a new biological opinion on the coordinated long-term operation of the SWP and CVP on the effects to delta smelt. In June 2009, the NMFS issued a new biological opinion on the coordinated long-term operation of the SWP and CVP on the effects to currently listed species (e.g., Central Valley spring-run Chinook salmon, Central Valley steelhead, Southern District Population Segment of North American green sturgeon, and Southern Resident killer whale). Reclamation provisionally accepted and then implemented the Reasonable and Prudent Alternatives included in these biological opinions. The operational criteria included in the Reasonable and Prudent Alternatives resulted in changes to operations of upstream reservoirs, stream flows, Delta outflow, and SWP and CVP south Delta intakes.

Several lawsuits were filed in the Court related to various aspects of the USFWS and NMFS biological opinions, and to the acceptance and implementation of the associated Reasonable and Prudent Alternatives by Reclamation. Between 2009 and 2010, the Court ruled that Reclamation failed to conduct an environmental analysis under the National Environmental Policy Act (NEPA) of potential impacts to the human environment before provisionally accepting and implementing the Biological Opinion Reasonable and Prudent Alternatives. In 2010, the Court found certain portions of the USFWS biological opinion to be arbitrary and capricious, and remanded those portions of the biological opinion to the USFWS. The Court ordered Reclamation to review the biological opinion and Reasonable and Prudent Alternative in accordance with NEPA. In 2011, the Court remanded the biological opinion to the NMFS.

Reclamation has continued the consultation with USFWS and NMFS for modification of the biological opinions, and has initiated the NEPA process through publication of the Notice of Intent on March 28, 2012. The Court order required completion by Reclamation of the Environmental Impact Statement

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(EIS) and the USFWS biological opinion related to delta smelt by December 1, 2013. The Court order also required completion by Reclamation of the EIS and the NMFS biological opinion related to Central Valley spring-run Chinook salmon, Central Valley steelhead, Southern District Population Segment of North American green sturgeon, and Southern Resident killer whale by February 1, 2016. The Court did not vacate the biological opinions, and therefore, SWP and CVP operations are analyzed each year with respect to the Reasonable and Prudent Alternatives.

The most recent Metropolitan Regional Urban Water Management Plan (RUWMP) (Metropolitan November 2010, page 1-18) indicates that operational constraints similar to the most recent biological opinions and associated Reasonable and Prudent Alternatives would likely be continued until future long-term plans, such as the Bay Delta Conservation Plan (BDCP), would be implemented. A similar discussion was included in the EMWD Urban Water Management Plan (UWMP) (2010, page 38).

To address potential constraints on the SWP, Metropolitan has developed near and long-term action plans to increase water supply reliability. Metropolitan is also working with stakeholders throughout the state to develop and implement long term solution to the problem in the Bay Delta. The BDCP developed by State and Federal resource agencies, aimed at addressing ecosystem needs and securing long-term operating permits for the SWP. A working draft of the BDCP was released in November of 2010 and reflects significant progress toward consensus on a plan to restoring the Bay-Delta ecosystem and associated sensitive species and provides for improved water supply and reliability.

Conclusion. Based on this analysis, the proposed WLC project is not expected to interfere with groundwater recharge activities or groundwater supplies. Impacts associated with this issue are less than significant, and no mitigation is required.

4.9.5.4 100-Year Flooding-Related Impacts

Threshold	Would the proposed project place within a 100-year flood hazard area structures that would impede or redirect flood flows? Would the proposed WLC project place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
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The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) identify areas subject to flooding during the 100-year storm.¹ Based on these FIRM maps, the project site does not fall within a 100-year flood zone.² Because the project site does not lie within a 100-year floodplain, impacts related to this issue are less than significant. No further discussion or mitigation is required.

4.9.6 Significant Impacts

4.9.6.1 Drainage Pattern and Capacity-Related Impacts

Impact 4.9.6.1: *The project may significantly increase off-site runoff.*

¹ The term “100-year” is a measure of the size of the flood, not how often it occurs. The “100-year flood” is a flooding event that has a one percent chance of occurring in any given year.

² FEMA DFIRM Data, 2008.

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Threshold	<p>Would the proposed WLC project substantially alter the existing local drainage patterns of the site and substantially increase the rate or amount of surface runoff in a manner which would result in substantial erosion, siltation, or flooding on site or off site?</p> <p>Would the proposed WLC project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?</p>
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In general, runoff from the western portion of the site flows west toward the Perris Valley Storm Drain, while runoff from the eastern portion of the WLC site flows south into Mystic Lake, and (during times of high storm flow), reaches the San Jacinto River south of the San Jacinto Wildlife Area. As previously illustrated in Figure 4.9.1, the Specific Plan area is divided into six off-site and on-site HSAs. In general, existing storm water flows coming onto the Specific Plan area from the Badlands (Drainage Subarea A) are conveyed through a 12 foot by 8 foot reinforced concrete box (RCB). The RCB drains to the south through the existing Highland Fairview Corporate Park site (a 36-inch and 42-inch storm drain underlying Eucalyptus Avenue outlets to the RCB). Flows from the RCB sheet flow into a spreading area south of Eucalyptus Avenue and is dispersed onto the downstream agricultural land in its historical pattern. Further south, flows coming from the adjacent agricultural land are routed to an existing RCFCWCD earthen channel, identified as Line “F” in the MMDP, located along Redlands Boulevard and ultimately routed to the Perris Valley Storm Drain.

For the eastern portion of the Specific Plan Area (Drainage Subareas B, C, D, E, and F), there currently is no master plan of drainage. Open ditches and drainage culverts along Theodore Street and Gilman Springs Road convey off-site runoff from adjacent areas to the north and east. The drainage culverts along Gilman Springs Road drain into the San Jacinto Wildlife Area. The land uses and roadway facilities proposed under the Specific Plan would require modifications to the existing hydrologic patterns within the project vicinity to accommodate and manage these flows.

As part of the Specific Plan, a Master Plan of Drainage for the project area was developed (see Drainage Report). Table 4.9.I provides a summary of each of the proposed drainage subareas. Figure 4.9.3 outlines the drainage areas identified in this Master Plan of Drainage and indicates that, with implementation of the proposed project, the Specific Plan area would be divided into six drainage subareas.

As identified in Table 4.9.I, the majority of the existing Line “E” will remain as is; with four exceptions:

- 1) Where Line “E” crosses the proposed Alessandro Boulevard, a bridge or culvert will be provided at the crossing;
- 2) Where the proposed Lateral E-1 will connect with Line E.
- 3) Removal of the concrete at Alessandro Boulevard and lowering the grade above to match the downstream portion.
- 4) Installation of energy dissipating devices to slow water flow in order to reduce erosion and increase available moisture.

Storm water flows from the westerly portion of the project will be routed to Line “F” of the RCFCWCD MMDP similar to existing drainage patterns in the project area. Line “F” flows in a southwesterly direction and joins the Kitching Street Channel near Iris Avenue and Lasselle Street. Kitching Street Channel flows in a southerly direction and joins the Perris Valley Storm Drain south of Krameria Avenue. Once the storm water flows reach the Perris Valley Storm Drain, they will travel approximately 5.4 miles until joining Reach 3 of the San Jacinto River. This river travels 5.6 miles to Canyon Lake (Reach 2) and another 7.1 miles through Canyon Lake to Lake Elsinore (Reach 1).

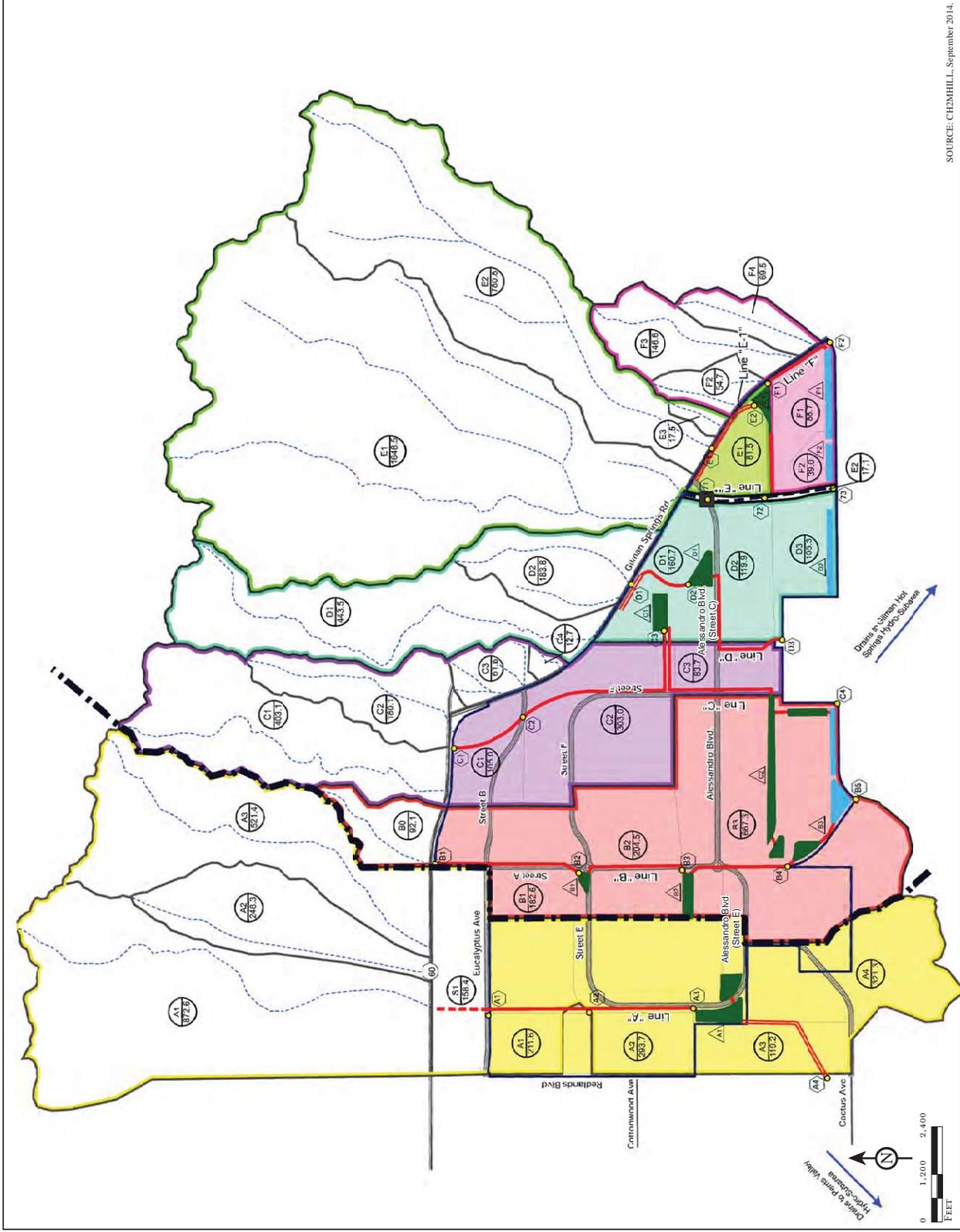
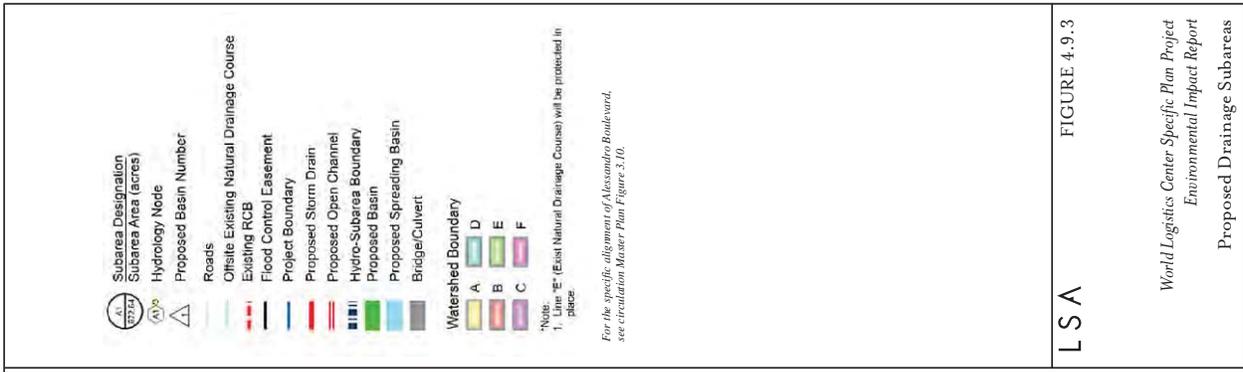
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Lake Elsinore is essentially the terminus for the San Jacinto River and the San Jacinto Watershed. Although Temescal Creek and the Santa Ana River were included in the ultimate flow path from the project site, flows that reach Lake Elsinore rarely spill into Temescal Creek or into the Santa Ana River due to local topography.

Table 4.9.I: Summary of Drainage Areas

Watershed	Area (acres)		HSA	Description
	Without Project	With Project		
A	2,657	2,746	Perris Valley	Storm water runoff coming from north of SR-60 would be routed to the proposed Sinclair Detention Basin. Since the proposed Sinclair Detention Basin is not expected to be constructed prior to the proposed WLC project, the existing 12-foot by 8-foot RCB will need to be extended southerly as proposed Line "F" (referred as Line "F" in MMDP) to convey the off-site flow. The project also proposes one on-site detention basin to mitigate on-site flows and then outlet to Line "F." Ultimately, Line "F" would flow to the discharge point Node 4 at Redlands Boulevard and eventually drain to the RCFCWCD regional facility.
B	1,361	1,147	Gilman Hot Springs	Storm water runoff coming from north of SR-60 would be conveyed to the proposed Line "B" along Theodore Street. The WLCSP proposes three (3) detention basins to mitigate the on-site flows. The outflow from the basins will be conveyed to Line "B" and routed to the proposed spreading area.
C	1,061	1,149	Gilman Hot Springs	Storm water runoff coming from north of SR-60 and north of Gilman Springs Road would be conveyed to the proposed Line "C" and routed to the proposed spreading area. The project proposes two (2) detention basins to mitigate the on-site flows. The outflow from the detention basin along with the off-site flow will sheet flow through the spreading area and then exit the project boundary.
D	965	1,013	Gilman Hot Springs	Off-site storm water runoff from north of Gilman Springs Road would be conveyed to the proposed Line "D." The WLCSP proposes two detention basins to mitigate the on-site flows. The outflow from the basins will be conveyed to Line "D" and the spreading area.
E	2,510	2,545	Gilman Hot Springs	Off-site runoff from north of SR-60 would be routed to the existing earthen channel Line "E." The majority of Line "E" will be protected in place. Easement on either side of the channel is provided for the floodplain. Where Line "E" crosses the proposed Street C a bridge or culvert will be provided. Line "E-1" conveys flows to and from one (1) detention basin. Line "E-1" within proposed Street C, will connect to Line "E". The concrete portion of Alessandro Boulevard will be removed and grades lowered to match downstream, and energy dissipating devices will be installed. The runoff exits the project southerly boundary at discharge point Node 73.
F	445	399	Gilman Hot Springs	Off-site runoff from north of Gilman Springs Road would be conveyed to the proposed Line "F." The WLCSP proposes two (2) detention basins to mitigate the on-site flows. The outflow from the basins will be conveyed to Line "F" and exit the project southerly boundary at discharge point Node 3.
Total	8,999 acres	8,999 acres		

Source: Table 4.1, Master Plan of Drainage Report, CH2M HILL, September 2014.



SOURCE: CHEMHILL, September 2014.

LSA **FIGURE 4.9.3**

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The Perris Valley Storm Drain Master Plan identifies future improvement needs of the channel based on future growth, including development of the WLCSP area. The backbone of the regional storm drainage system south of the City is the 250-foot wide earthen Perris Valley Storm Channel (PVSC). The PVSC is the primary collector of storm water in the northern part of Perris and the southern end of Moreno Valley. The PVSC was built and is currently owned and maintained by the RCFCWCD. The PVSC collects runoff from this area and transports the flows through Perris Valley and to the San Jacinto River. The 24-mile long San Jacinto River enters southern Perris from the east, at approximately the intersection of I-215 and Ellis Avenue, and runs approximately six miles to the extreme southwesterly boundary of the City. The PVSC is a major part of the Master Drainage Plan adopted as part of the Perris Valley Commerce Center Specific Plan.

The PVSC is part of the regional flood control system intended to convey regional flood flows from the upper watershed in Moreno Valley to the confluence with the San Jacinto River in the southern portion of the City. The Perris Valley Storm Channel Specific Plan (PVSCSP) Master Drainage Plan reduces the 100-year floodplain and accommodates 100-year flood events in the area. The PVSC regional system consists of several miles of open channel, several bridge crossings, and a number of retention basins to help capture storm water during seasonal and peak storm events. Historically, flooding in this part of the Perris Valley has been a longstanding issue. To manage seasonal, peak, and 100-year flooding events, in the late 1980s and early 1990s, Riverside County and the RCFCWCD adopted several Master Drainage Plans that were periodically refined. However, these Master Drainage Plans were adopted during the time period in which the land areas covered by the Master Drainage Plans were utilized primarily for agricultural uses. In the late 1990s, increasing urban development occurred in these areas and it became evident that variations to the precise Master Drainage Plans adopted by the County and RCFCWCD would be required to facilitate the construction of needed infrastructure. The adoption of the PVSCSP in 2012 by the City of Perris included refinements to the facilities necessary to control flooding in the PVSCSP planning area.

Engineering of these ultimate PVSC improvements has been designed to handle storm water flows from 100-year storm events. Within the City of Perris, the majority of the PVSC flood control system is not constructed to the ultimate condition envisioned by the PVSCSP. As a result, the reduced capacity within the existing channel causes regional flood flows to exceed the banks of the channel and flood the surrounding area. With the construction of the ultimate system, the 100-year storm floodplain will be reduced by several hundred acres, and the surrounding properties and roadways will be protected from flooding.

Although the PVSC has not yet been widened to its ultimate width, expected runoff from the proposed WLC project will not exceed current levels because on site detention and infiltration basins will be provided to mitigate and control runoff and drainage patterns to pre-project levels in accordance with **Mitigation Measure 4.9.6.1A**. Flow characteristics and locations of the detention and infiltration basins are outlined in the project hydrology study prepared by CH2MHill (see Appendix J). See Table 4.9.1 and Figure 4.9.4. These proposed basins will be located and designed such that the existing sub-watersheds and the existing drainage pattern and flows leaving the project boundary mimic existing conditions. Therefore, development of the WLC project will not have significant impacts on regional flood control, even prior to ultimate buildout of the PVSC.

The development of this project will include the construction of buildings, parking areas, sidewalks, roads and other infrastructure such as storm water, water, and sewer facilities. Because the development of the proposed project will substantially increase the amount of impervious surfaces, the post-development flow volumes that will be generated on site are anticipated to be substantially higher than the pre-development flows.

Conditions resulting from this change will include increased runoff volumes and velocity; reduced infiltration; increased flow frequency, duration, and peak; shorter time to reach peak flow; and

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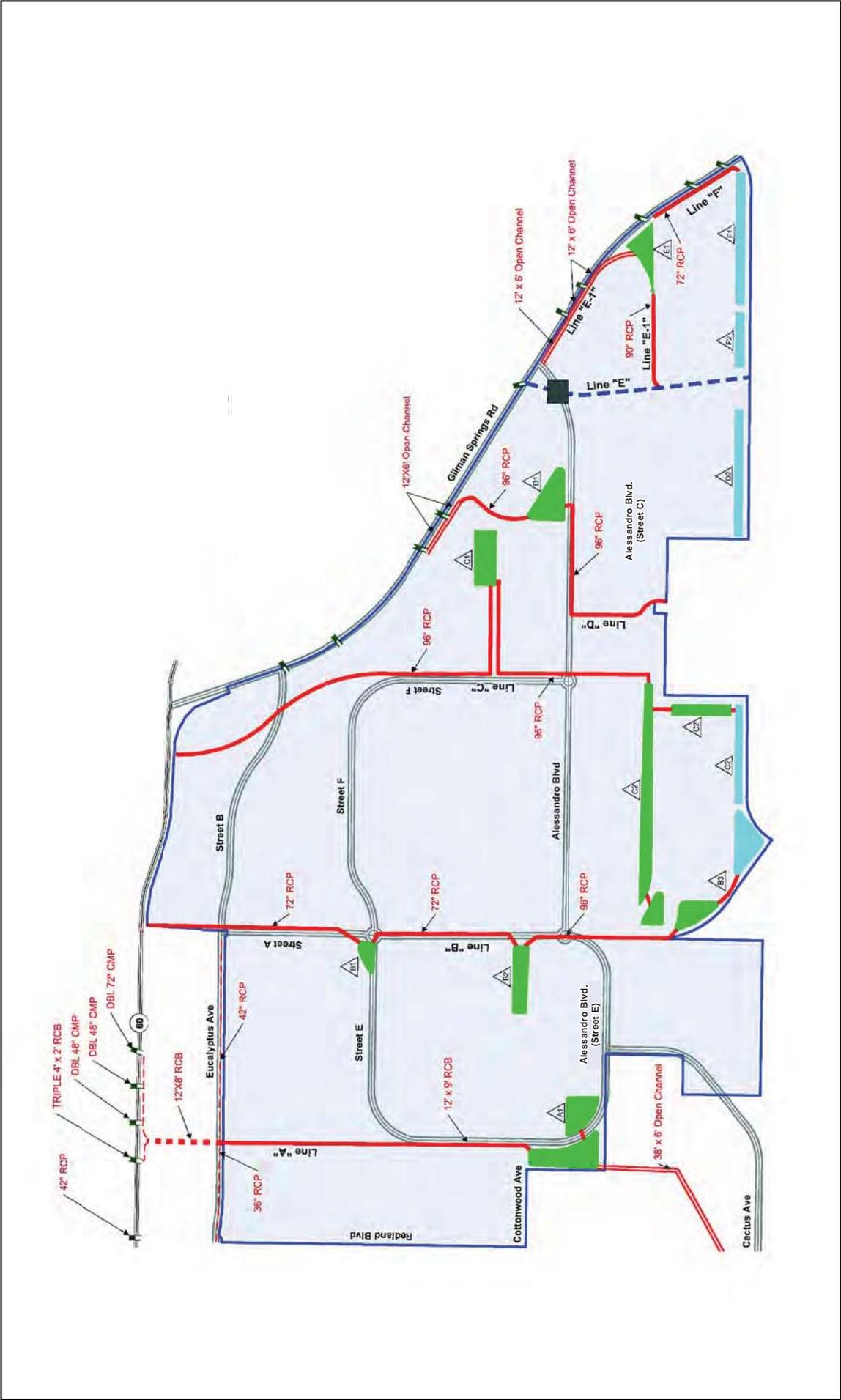
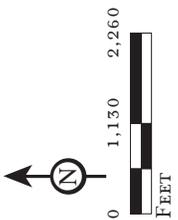


FIGURE 4.9.4

Note: For the specific alignment of Alessandro Boulevard, see circulation Master Plan Figure 3.10.

- Proposed Basin Number
- Existing Storm Drain
- Existing RCB
- Proposed Storm Drain
- Proposed Open Channel; LINE D OPEN CHAN
- Natural Flow (Line "E")
- Project Boundary

- Proposed Basin Number
- Exist Culvert
- Bridge/Culvert
- Proposed Basin
- Proposed Spreading Basin



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degradation in water quality. The project site currently has a low runoff coefficient, meaning that runoff during storms represents a relatively small portion of the total rainfall. The majority of the precipitation, particularly in smaller storms, infiltrates into the subsurface. The development of the Specific Plan area with impervious surfaces (such as roadways, parking lots, and buildings) would result in a condition in which nearly all rainfall becomes runoff.

NOTE: The following changes have been made in response to Comment B-3-39 in Letter B-3 from the California Department of Fish and Wildlife and Comment B-6-5 from Letter B-6 from the Santa Ana Regional Water Quality Control Board.

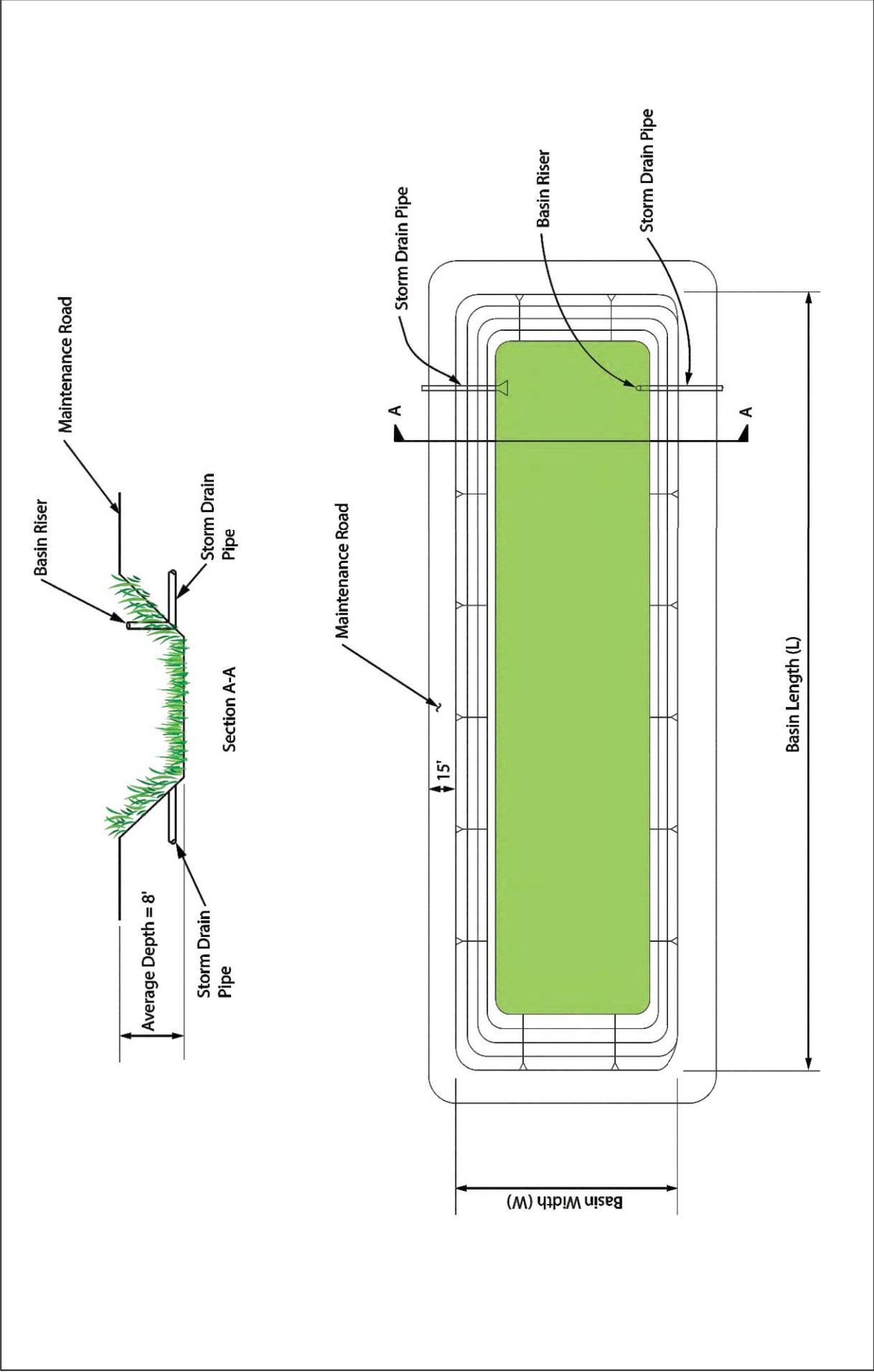
A significant impact would be deemed to have occurred in the event that post-development storm water flows, volumes or velocities are greater than pre-development storm water flows leaving the site. However, flows, volumes, and velocities will not increase because volume is stored in the basins and infiltrated or released at a controlled rate after the storms (CH2MHill 2014). Each detention basin has 2 feet of dead storage so that flows will infiltrate in the ground. Table 4.9.J presents the sizes of each of the basins. Figures 4.9.5 and 4.9.6 show typical sections for the basins. Two separate analyses were performed for the detention and infiltration basins. The first analysis was part of the drainage system analysis to size the basins to mitigate the flow from the 100-year 3 and 24-hour storms. In this analysis the bottom 2 feet of the basins (identified as Basin Infiltration Depth in Table 4.9.J) is infiltration storage and assumed to be full prior to the storm. The second analysis was performed to analyze the pre and post project infiltration for the project. This is a water balance model analysis of historical daily runoff.

The project hydrology study used local hydrographs and flood routing models to simulate the proposed condition. Based on the modeling results, the 100-year, 3-hour storm provides the highest peak flows, and the 100-year, 24-hour storm provides the highest flow volumes. The 100-year, 3-hour peak flows are used to preliminarily size the proposed drainage systems. Table 4.9.K provides the modeled peak flows for the 100-year, 3-hour storm scenario.

Flows at Project Boundary. Flows exiting the project's boundary in the proposed condition will mimic existing conditions. There are six watershed areas and drainage courses that deliver flow through the project area. These are identified as watershed areas "A" through "F" on Figure 4.9.3. The existing capacity of these drainage courses at the project boundary was determined. Flows in excess of this capacity would flow overland and sheet flow across the project boundary in the existing condition. Detention Basins and spreading area facilities are proposed to reduce the proposed conditions flow to pre-project conditions at the project boundary. Table 4.9.L identifies the existing and proposed 100-year flow, the drainage course capacity, and the sheet flow at the project boundary.

Flow Velocities at Project Boundary. This project proposes a number of open space, detention basins and spreading areas to mitigate the increased runoff, volumes and flow velocities. As a result, the flow velocities at the project boundary for the proposed condition are less than the existing condition, as illustrated in Table 4.9.M. For the watersheds "A" and "E" in the proposed condition, the runoff will flow to the existing Green Belt Channel and existing earth channel, respectively. Therefore, sheet flow would not occur at the project boundary. The flow velocities in the watersheds "B," "C," "D," and "F" for the proposed and existing conditions were analyzed. For the proposed condition, the runoff will flow to the basins and spreading areas, then weir flow over a level curb, and eventually flow to the existing channels downstream of the project's boundary. Flows in excess of channel capacity would flow overland and sheet flow across the project's boundary. For the existing condition, the runoff would flow in to the existing drainage channels, and the flow in excess of channel capacity would flow overland and sheet flow across the project's boundary.

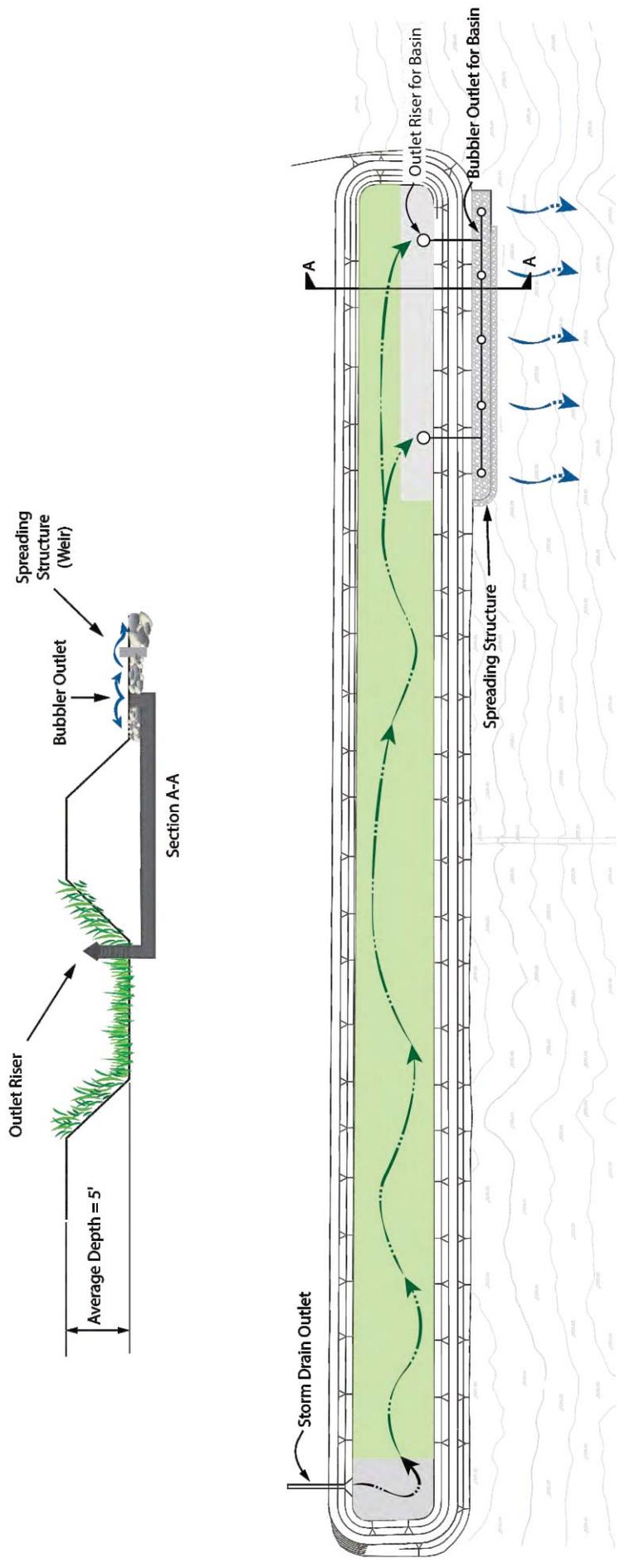
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FIGURE 4.9.5

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FIGURE 4.9.6

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Typical Detention Basin With Drainage Spreading Structure

SOURCE: HF, 2014.

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Table 4.9.J: Proposed Basins

Basin No.	Approx. Basin Length (ft)	Basin Top Width (ft)	Basin Depth (ft)	Basin Detention Depth (ft)	Basin Infiltration Depth (ft)	Side Slope	Basin Detention Volume (ac-ft)	Basin Infiltration Volume (ac-ft)	Total Basin Volume (ac-ft)
A1	1,200	1,260	8	6	2	2	97	32	129
B1	540	240	8	6	2	2	12	4	16
B2	1,140	240	8	6	2	2	41	14	55
B3*	2,520	360	5	3	2	2	45	30	75
C1	1,100	360	8	6	2	2	80	27	107
C2*	6,120	120	5	3	2	2	73	49	122
D1	960	600	6	4	2	2	42	14	56
D2*	2,200	120	5	3	2	2	28	18	46
E1	960	480	6	4	2	2	26	8	34
F1*	2,300	120	5	3	2	2	18	12	30
F2*	840	120	5	3	2	2	7	4	11

*spreading basin

Source: Master Plan of Drainage Report, CH2MHILL, September 2014.

Table 4.9.K: Existing and Proposed Storm Water Runoff for 100-Year, 3-Hour Storm Event

Watershed	Peak Flow (cfs)	
	Existing	Proposed ¹
A	2,470	2,170
B	1,130	930
C	820	750
D	815	795
E	1,990	1,800
F	495	390

Source: Master Plan of Drainage Report, CH2MHILL, September 2014.

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Table 4.9.L: Comparison of Existing and Proposed Flows at Project Boundary

Watershed	Existing Conditions at Project Boundary			Proposed Conditions at Project Boundary		
	Existing 100-year Flow (cfs)	Existing Drainage Course Capacity (cfs)	Existing 100-year sheet flow (cfs)	Proposed 100-year Flow (cfs)	100-year flow from Basin to Drainage Course (cfs)	Proposed 100-year sheet flow from Basin (cfs)
A ¹	2,470	2,200	270	2,170	N/A	N/A
B	1,130	55	1,075	930	55	875
C	820	165	655	750	165	585
D	815	65	750	795	65	730
E ²	1,990	6,220	0	1,800	N/A	N/A
F	495	70	425	390	70	320

¹ Flows to improved channel - No sheet flow proposed in proposed conditions.

² Existing facility has capacity for flow – No detention basin proposed.

Source: *Master Plan of Drainage Report*, CH2MHILL, September 2014.

Table 4.9.M: Comparison of Existing and Proposed Flow Velocities at Project Boundary

Existing Watershed	Node*	Velocity (fps)	Prop Watershed	Node*	Velocity (fps)
B	12	5.16	B	B5	2.19
	22	4.40			2.19
C	37	8.80	C	C4	2.01
	41	3.60			2.01
D	53	4.77	D	D3	2.10
	61	4.45			2.10
F	81	3.33	F	F2	1.78
	83	6.29			1.78
	102	3.61			1.78
	112	3.83			1.78

Source: *Master Plan of Drainage Report*, CH2MHILL, September 2014.

Runoff and Infiltration Volumes Comparison. An analysis and comparison of the volume of runoff and infiltration for the pre and post project conditions was performed. A total of three scenarios were analyzed, baseline plus the following two project scenarios:

- Baseline or Pre Project conditions, where most of the land use is agricultural and the crop is considered to be dry wheat.
- Scenarios of Post Project Conditions, where the development of the site will happen and the impervious area will increase. Two scenarios were considered under the Post development conditions, those are:

Scenario 1) Detention Basins and bioretention areas with 0.15 in/hr infiltration rate. This scenario considers the use of detention basins not only for storm peak attenuation but also for infiltration. The lower end of the minimum infiltration rate for soil type B is considered. The detention basins are assumed to take 3 days to empty and total dead storage currently assumed at 212 acre-feet (AF). In reality the amount of dead storage needed will be a function of the measured infiltration rate at the site. The bioretention areas are areas where the runoff is directed to prior to the detention basins. The bioretention areas consist of landscaped areas that provide treatment and infiltration.

Scenario 2) Detention Basins and bioretention areas with 0.3 in/hr infiltration rate. This scenario considers the use of detention basins not only for storm peak attenuation but also for infiltration. The higher end of the minimum infiltration rate for soil type B is considered. The detention basins are assumed to take 3 days to empty and dead storage is assumed at 212 acre-feet.

The results are summarized in Table 4.9.N

Table 4.9.N: Model Results for Runoff and Infiltration and the Percentage Change from Baseline Conditions

Scenario	Runoff		Infiltration	
	1990-2012 Average(AF/yr)	Percent Change from Baseline	1990-2012 Average(AF/yr)	Percent Change from Baseline
Baseline	59	—	1,649	—
Scenario 1	125	110%	1,850	12%
Scenario 2	40	-33%	1,945	18%

Source: Master Plan of Drainage Report, CH2MHILL, September 2014.

The project’s impacts will be mitigated with the implementation of Scenario 2. The volume of runoff after the project is constructed will be less than the existing volume of runoff and the amount of infiltration will increase. Infiltration tests to refine Scenarios 1 and 2 will be performed in final design so runoff and infiltration will mimic existing conditions.

To the degree possible, the project will site basins in areas of cut that do not require over excavation, this should result in acceptable infiltration rates. In the event the soil at a basin site does not meet the required infiltration rate, dry wells, hybrid bioretention/dry wells or infiltration trenches will be used to achieve the target infiltration rate. All three of these BMP’s will reach past impervious clay or compacted fill area to deeper more pervious soils. Dry wells are considered Class V wells and require submission of an “Inventory Form” to the EPA. Infiltration tests will be done prior to design of basins so that the proper BMP’s can be incorporated into the basins. It should also be noted that groundwater levels in the project area are in excess of 100 feet below ground surface (DEIR Section 4.6.5.4, Geology and Soils).

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Due to the construction of impervious surfaces on the project site, post-development flows will be higher than the pre-development flows. To avoid a significant impact to the existing drainage capacity, the post-development flows, volumes, and velocities coming from the proposed project site must be managed to be equal to or less than pre-development flows, volumes, and velocities.¹ As required by **Mitigation Measure 4.9.6.1A**, flows will be reduced to below or equal to pre-development conditions by routing the on-site storm water flows through a series of on-site detention and infiltration basins before flows are released off site. The existing storm water runoff discharge rate for the undeveloped project site is 7,720 cubic feet per second (cfs). With the installation of the on-site detention basins, culverts, and energy dissipaters included in the project, expected discharges would be at a rate of 6,835 cfs, which is less than the existing condition. With the installation of the storm drain system facilities outlined in CH2M Hill's hydrology reports (see Appendix J) and implementation of the recommended mitigation measures, the buildout of the project will convey storm flows safely through the region in accordance with Riverside County Flood Control requirements and will not result in flooding or additional erosion within the project area or any downstream areas, including the Perris Valley Storm Drain Channel.

For additional analysis regarding anticipated construction and operational pollutants, please refer to Section 4.9.6.2, *Construction-Related Water Quality Impacts*, and Section 4.9.6.3, *Operational-Related Water Quality Impacts*.

Development of the proposed WLC project site will increase impervious surfaces on the project site due to the construction of the project's buildings, roadways, and associated improvements. While the resultant increase in impervious surfaces would contribute to a greater volume and higher velocities of storm flow, **Mitigation Measure 4.9.6.1A** requires the WLC project site's drainage system be designed to accept and accommodate runoff that would result from the project construction at or better than historic, or pre-development, conditions, as outlined in the project's Master Plan of Drainage shown in previously referenced Figure 4.9.4. **Mitigation Measure 4.9.6.1B** provides for the operation and maintenance of these facilities to ensure that they will be maintained.

Ultimately, for the proposed condition, the peak flows at downstream discharge points where the flows exiting the southerly project boundary, will not exceed the peak flows for the existing condition. As the WLC project develops and regional drainage improvements are installed as anticipated (e.g., Perris Valley Storm Drain Master Plan), there should be no long-term significant impacts related to storm drainage or flood control. Overall, current experiences with flooding in the general project vicinity should decrease as on-site drainage is contained or controlled in planned improvements and detention basins. Section 4.16, *Utilities and Service Systems*, provides additional analysis of on-site drainage capacity relative to planned storm drain improvements.

NOTE: The following changes have been made in response to Comment F-1-77 in Letter F-1 from Center for Biological Diversity/San Bernardino Valley Audubon Society and Comment F-11-44 in Letter F-11 from the Sierra Club.

Project or Specific Plan Design Features. The Drainage Master Plan (DMP) and creation and maintenance of the proposed combined detention and infiltration basins in the southern portion of the project according to the DMP will help ensure that there will be no significant off-site impacts related to runoff from the proposed project. These facilities will be designed based on the most up-to-date hydrology based on the latest rainfall to runoff patterns in compliance with local, state, and federal regulations. The design of the drainage facilities include a factor of safety in the form of freeboard to

¹ As part of the MS4 Permit issuance requirements, projects must identify any Hydrologic Conditions of Concern and demonstrate that changes to hydrology are minimized to ensure that post-development runoff rates and velocities from a site do not adversely impact downstream erosion, sedimentation or stream habitat.

account for uncertainties due to climate change, rainfall patterns, friction factors and other uncertainties. One foot of freeboard was included in the detention basins and drainage facilities to account for these uncertainties. At the time of final design the amount of freeboard to account for these uncertainties will be finalized. The facilities are being designed to provide both detention and infiltration to mitigate increases in runoff volume, velocity and peak discharge as outlined in the following mitigation measure.

The changes to the following mitigation measures have been made in response to Comment B-3-39 in Letter B-3 from the California Department of Fish and Wildlife, Comment F-1-77 in Letter F-1 from Center for Biological Diversity/San Bernardino Valley Audubon Society, Comments F-5-13 and –F-5-23 in Letter F-5 from the Inland Empire Waterkeeper, Comment F-11-41 in Letter F-11 from the Sierra Club et al, and other related comments.

Mitigation Measures. The following measure is proposed to help ensure that runoff from the proposed project site does not have significant impacts on downstream off-site properties, including the SJWA:

4.9.6.1A Prior to issuance of any building permit within the Specific Plan area, the developer shall construct storm drain pipes and conveyances, as well as, combined detention and infiltration basin(s), bioretention areas, and spreading area(s) within each proposed watershed, as outlined in the project hydrology plan, to mitigate the impacts of increased peak flow rate, velocity, flow volume and reduce the time of concentration by storing and infiltrating increased runoff for a limited period of time and release the outflow at a rate that does not exceed the pre-development peak flows and velocities for the 2, 5, 10, 25, and 100-year storms and volumes as assessed in the water balance model for historical conditions. For the purpose of this mitigation measure, the term “construct” shall mean to substantially complete construction so as to function for its intended purpose during construction with complete construction prior to occupancy. Field investigations will be conducted to determine the infiltration rate of soils underlying the proposed locations of bioretention areas and detention basins. The infiltration rate of the underlying soils will be used to properly size the bioretention areas and detention basins/infiltration basins to ensure that adequate volumes of runoff, in cumulative total for all bioretention areas and detention basins are captured and infiltrated. The water balance model will be updated and rerun for the site-specific conditions encountered to confirm the water balance. This measure shall be implemented to the satisfaction of the City Engineer. Energy dissipaters shall be used as the spillways of basins to reduce the runoff velocity and dissipate the flow energy. Drainage weir structures shall be constructed at the downstream end of the watersheds flowing to the San Jacinto Wildlife Area to control the runoff and spread the flow such that the flows exiting the project boundary will return to the sheet flow pattern similar to the existing condition. Detention basins and spreading areas shall be designed to account for the amount of the sediment transported through the project boundary so that the existing sediment carrying capacity is maintained.

4.9.6.1B The bioretention areas and detention/infiltration basins shall be designed to assure infiltrations rates. The monitoring plan will follow the guidelines presented by the California Storm Water Quality Association (CASQA) in the California Storm Water Best Management Program (BMP) Handbook, Municipal, January 2003 Section 4, Treatment Control Best Management Programs Fact Sheets TC-11 Infiltration Basin and TC-30 Vegetated Swale).

For the Bioretention areas, as needed maintenance activities shall be conducted to remove accumulated sediment that may obstruct flow through the swale. Bioretention areas shall be monitored at the beginning and end of each wet season to assess any degradation in infiltration rates. The maintenance activities should occur when sediment

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on channels and culverts builds up to more than 3 inches (CASQA 2003). The swales will need to be cultivated or rototilled if drawdown takes more than 72 hours.

For the detention/infiltration basins, a 3-5 year maintenance program shall be implemented mainly to keep infiltration rates close to original values since sediment accumulation could reduce original infiltration rate by 25-50%. Infiltration rates in detention basins will be monitored at the beginning and end of each wet season to assess any degradation in infiltration rates. If cumulative infiltration rates of all detention basins drops below the minimum required rates, then the detention basins will be reconditioned to improve infiltration capacity by scraping the bottom of the detention basin, seed or sod to restore groundcover, aerate bottom and dethatch basin bottom (CASQA 2003).

Level of Significance after Mitigation. Implementation of the Master Drainage Plan of the Specific Plan and **Mitigation Measures 4.9.6.1A** and **4.9.6.1B** will reduce potential impacts associated with runoff from the project site to less than significant levels.

4.9.6.2 Construction-Related Water Quality Impacts

Impact 4.9.6.2: *The project may cause surface water pollution during construction.*

Threshold	Would the proposed project violate any water quality standards or waste discharge requirements during construction phases of the project in form of increased soil erosion, sedimentation, or storm water discharges?
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The grading phases of any portion of the project will require temporary disturbance of surface soils and removal of vegetative cover, which could potentially result in erosion and sedimentation, major visible water quality impacts attributable to construction activities. Stockpiles and excavated areas would be susceptible to high rates of erosion from wind and rain and, if not managed properly, could result in increased sedimentation in local watercourses.

By volume, sediment is the principal component in most storm runoff. The delivery, handling, and storage of construction materials and wastes, as well as the use of on-site construction equipment will also introduce a risk for storm water contamination. Spills and leaks could occur from the use of construction equipment and could originate from construction staging areas. Once released, substances such as fuels, oils, paints, and solvents can be transported to nearby surface waterways and/or to groundwater in storm water runoff, wash water, and dust control water, potentially reducing the quality of the receiving waters. The anticipated and potential pollutants in storm water or urban runoff for various land uses are reflected in previously referenced Table 4.9.F.

Short-term storm water pollutant discharges from each development site within the project will be mitigated through compliance with the required NPDES permits, resulting in a less than significant impact. The NPDES permit program was established under Section 402 of the CWA, which prohibits the unauthorized discharge of pollutants, including municipal, commercial, and industrial wastewater discharges, from point sources to U.S. waters. Permittees must verify compliance with permit requirements by monitoring their effluent, maintaining records, and filing periodic reports. An NPDES permit specifies an acceptable level of a pollutant or pollutant parameter in a discharge (for example, a certain level of bacteria) and the permittee selects an appropriate process or technology to achieve that level. Some permits, however, do contain certain generic BMPs. Table 4.9.O lists possible construction site BMPs for runoff control, sediment control, erosion control, and housekeeping that may be used during the construction phases of the proposed WLC project. These construction site

BMPs are only examples of what should be considered and should not preclude new or innovative approaches currently available or being developed.

The implementation of NPDES permits, including the General Construction permit, ensures that the Federal and State standards for clean water are met. Enforcement of required NPDES permit requirements will prevent sedimentation and soil erosion through implementation of an SWPPP and periodic inspections by RWQCB staff. An SWPPP is a written document that describes the construction operator’s activities to comply with the requirements in the NPDES General Construction permit. Required elements of an SWPPP include (1) site description addressing the elements and characteristics specific to the project site; (2) descriptions of BMPs for erosion and sediment controls; (3) BMPs for construction waste handling and disposal; (4) implementation of approved local plans; and (5) proposed post-construction controls, including a description of local post-construction erosion and sediment control requirements. The SWPPP establishes a plan whereby the operator evaluates potential pollutant sources at the site and selects and implements BMPs designed specifically to prevent or control the discharge of the identified pollutants into storm water runoff.

Table 4.9.O: General Construction Site Best Management Practices

Runoff Control	Sediment Control	Erosion Control	Good Housekeeping
<ul style="list-style-type: none"> • Minimize clearing • Preserve natural vegetation • Stabilize drainage ways • Install check dams • Install diversion dikes 	<ul style="list-style-type: none"> • Install perimeter controls (e.g., silt fences) • Install sediment trapping devices (e.g. straw wattles, hay bales, gravel bags) • Inlet protection (e.g. check dams) • Install fiber rolls 	<ul style="list-style-type: none"> • Stabilize exposed soils (e.g., hydroseed, soil binders) • Protect steep slopes(e.g., geotextiles, compost blankets) • Cover stockpiles with blankets • Complete construction in phases 	<ul style="list-style-type: none"> • Create waste collection area • Put lids on containers • Clean up spills immediately

Source: National Pollutant Discharge Elimination System, *Construction Site Storm Water Runoff Control*, <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>, site accessed April 20, 2012.

Project or Specific Plan Design Features. The Specific Plan itself does not contain any features that address water quality issues related to construction, but the WQMP (see Appendix J), the DMP, and the landscaping plan will help reduce long-term water consumption and water quality impacts within the project. However, additional information has been added to the *Hydrology and Water Quality Master Plan of Drainage Report* (FEIR Volume 2 Appendix J) to provide specific and detailed plans for the drainage systems to include the size, capacity, design, function and maintenance requirements of the detention basins. The detention basins have been modified to combine detention and infiltration. Additional analysis has been performed to detail the infiltration capacity of the basins and indicates that runoff leaving the project site will be less than or equal to the existing condition. Infiltration after the project will be greater than the existing condition. Additional details on the spreading areas and mitigation of flow volumes and velocities at the project boundary have been added to the *Master Plan of Drainage Report* and are summarized in the Response to Comment B-3-37 from the CDFW to address similar comments regarding drainage and water quality impacts of the project.

Mitigation Measures. Although adherence to NPDES requirements is required of all development within the City, the incorporation of these requirements as **Mitigation Measures 4.9.6.2A** and

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4.9.6.2B are designed to ensure that any future development within the WLC Specific Plan area obtains coverage under the NPDES General Construction permit, and to track compliance with these requirements as part of the Mitigation Monitoring and Reporting Plan or Program (MMRP):

4.9.6.2A Prior to issuance of any grading permit for development in the World Logistics Center Specific Plan, the project developer shall file a Notice of Intent (NOI) with the Santa Ana Regional Water Quality Control Board to be covered under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of storm water associated with construction activities. The project developer shall submit to the City the Waste Discharge Identification Number issued by the State Water Quality Control Board (SWQCB) as proof that the project's Notice of Intent is to be covered by the General Construction Permit has been filed with the State Water Quality Control Board. This measure shall be implemented to the satisfaction of the City Engineer.

4.9.6.2B Prior to issuance of any grading permit for development in the World Logistics Center Specific Plan, the project developer shall submit to the State Water Quality Control Board (SWQCB) a project-specific Storm Water Pollution Prevention Plan (SWPPP). The Storm Water Pollution Prevention Plan shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the Storm Water Pollution Prevention Plan shall emphasize structural and nonstructural best management practices (BMPs) to control sediment and non-visible discharges from the site. Best Management Practices to be implemented may include (but shall not be limited to) the following:

- (a) Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the Best Management Practices are to be periodically inspected by the Regional Water Quality Control Board during construction, and repairs would be made as required.
- (b) Materials that have the potential to contribute non-visible pollutants to storm water must not be placed in drainage ways and must be placed in temporary storage containment areas.
- (c) All loose soil, silt, clay, sand, debris, and other earthen material shall be controlled to eliminate discharge from the site. Temporary soil stabilization measures to be considered include: covering disturbed areas with mulch, temporary seeding, soil stabilizing binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Stockpiles shall be surrounded by silt fences and covered with plastic tarps.
- (d) The Storm Water Pollution Prevention Plan shall include inspection forms for routine monitoring of the site during the construction phase.
- (e) Additional required Best Management Practices and erosion control measures shall be documented in the Storm Water Pollution Prevention Plan.
- (f) The Storm Water Pollution Prevention Plan would be kept on site for the duration of project construction and shall be available to the local Regional Water Quality Control Board for inspection at any time.

The developer and/or construction contractor for each development area shall be responsible for performing and documenting the application of Best Management Practices identified in the project-specific Storm Water Pollution Prevention Plan. Regular inspections shall be performed on sediment control measures called for in the Storm Water Pollution Prevention Plan. Monthly reports shall be maintained and available for City inspection. An inspection log shall be maintained for the project and shall be available at the site for review by the City of Moreno Valley and the Regional Water Quality Control Board.

Level of Significance after Mitigation. While on-site grading and development activities will increase the potential for the erosion of soils, adherence to the BMPs mandated by **Mitigation Measures 4.9.6.2A** and **4.9.6.2B** will reduce impacts associated with short-term (construction) storm water discharges during project construction to a less than significant level.

4.9.6.3 Operational-Related Water Quality Impacts

Impact 4.9.6.3: *The project may result in surface water pollution during operation.*

Threshold	Would the proposed project violate any water quality standards or waste discharge requirements during the operational phases of the project in the form of increased soil erosion, sedimentation, or urban runoff?
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During the operational phase of any urban use, the major source of pollution in storm water runoff will be contaminants that have accumulated on the land surface over which runoff passes. Storm runoff from the roadways, parking lots, and commercial and industrial buildings can carry a variety of pollutants such as sediment, petroleum products, commonly utilized construction materials, landscaping chemicals, and (to a lesser extent) trace metals such as zinc, copper, lead, cadmium, and iron, which may lead to the degradation of storm water in downstream channels. Runoff from landscaped areas may contain elevated levels of phosphorus, nitrogen, and suspended solids. Oil and other hydrocarbons from vehicles are also expected in storm water runoff.

Pollutant concentrations in urban runoff are variable depending on storm intensity, land use, elapsed time since previous storms, and the volume of runoff generated in a given area that reaches receiving waters. Pollutant concentrations are typically highest during the first major rainfall event after the dry season, known as the “first-flush.” The WQMP prepared for the project identifies pollutants and hydrologic conditions of concern that may be associated with the implementation of the project. Table 4.9.P identifies the receiving waters for post-development runoff from the site and states if the receiving water is listed as impaired or has a total maximum daily load (TMDL) adopted for a certain type of pollutant. Table 4.9.Q provides a summary of pollutants associated with proposed land uses within the Specific Plan area.

Table 4.9.P: Pollutant Stressors in Receiving Waters

Receiving Waters	Receiving Water Classification	303(d) Listing		Adopted TMDL Pollutants
	Proximate	Listed?	Pollutant Causing Impairment	
San Jacinto River	Yes	No	None	None
Canyon Lake (Railroad Canyon Reservoir)	No	Yes	Nutrients, Pathogens	Phosphorus, Nitrogen
Lake Elsinore	No	Yes	Nutrients, Organic Enrichment/Low Dissolved Oxygen, PCBs, Sediment Toxicity, Unknown Toxicity	Phosphorus, Nitrogen, Dissolved Oxygen

Source: *Preliminary Water Quality Management Plan for World Logistics Center Specific Plan*, CH2MHILL, September 2014.

As identified in Table 4.9.Q, pollutants associated with the operations of the proposed logistics land uses include sediments, nutrients, toxic organic compounds, trash and debris, bacterial indicators, oil and grease, pesticides, and metals. Based on the WQMP, all downstream receiving waters to which a project directly or indirectly discharges have been identified. The selection of treatment controls for the project shall be based primarily on the potential pollutants associated with the project that are also present in impaired receiving waters.

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As specific developments within the project are developed, updates to the Master WQMP for the World Logistics Center Specific Plan will be required to ensure that water quality treatment is being maintained per City requirements.

Table 4.9.Q: WLC Specific Plan Potential Pollutants

Pollutants	Specific Plan Land Use	Is/Does the Pollutant?	
		Have a Potential to Occur?	Impaired in Receiving Waters?
Sediments	Landscape/Open Areas	Yes	No
Nutrients	Industrial/Commercial Areas	Yes	Yes
Toxic Organic Compounds	Industrial/Commercial Areas	Yes	Yes
Trash and Debris	Industrial/Commercial Areas	Yes	No
Bacterial Indicators	Industrial/Commercial Areas	Yes	Yes
Oil and Grease	Industrial/Commercial Areas	Yes	No
Pesticides	Industrial/Commercial Areas	Yes	Yes
Metals	Industrial/Commercial Areas	Yes	No

Source: Preliminary Water Quality Management Plan for World Logistics Center Specific Plan, CH2MHILL, September 2014.

The WQMP prepared for the project (Appendix J) identifies the following BMPs to be implemented that will minimize the project’s effects on site hydrology, urban runoff flow rates, and pollutant loads. This comprehensive water quality approach will be implemented throughout the project and will establish a three-tier program for achieving water quality goals through the enforcement of site design, source control, and treatment control BMPs. These project-specific site design, source control, and treatment control BMPs are listed below.

Site Design BMPs. Site design BMPs are implemented to create a hydrologically-functional project design that attempts to mimic the natural hydrologic regime. In accordance with the Riverside County WQMP, projects shall implement site design concepts that achieve each of the following:

1. Minimize Urban Runoff
 - a. Maximize the permeable area.
 - b. Incorporate landscaped buffer areas between sidewalks and streets.
 - c. Maximize canopy interception and water conservation by planting native or drought-tolerant trees and large shrubs.
 - d. Use natural drainage systems.
 - e. Where soil conditions are suitable, use perforated pipe or gravel filtration pits for low flow infiltration.
 - f. Construct on-site ponding areas or retention facilities to increase opportunities for infiltration consistent with vector control objectives.
2. Minimize Impervious Footprint
 - a. Maximize the permeable area.

- b. Construct streets, sidewalks and parking lot aisles to the minimum widths necessary, provided that public safety and a walk able environment for pedestrians are not compromised.
 - c. Reduce widths of street where off-street parking is available.
 - d. Minimize the use of impervious surfaces such as decorative concrete, in the landscape design.
3. Conserve Natural Areas
 - a. Conserve natural areas.
 - b. Maximize canopy interception and water conservation by planting native or drought-tolerant trees and large shrubs.
 - c. Use natural drainage systems.
 4. Minimize Directly Connected Impervious Areas (DCIAs)
 - a. Runoff from impervious areas will sheet flow or be directed to treatment control BMPs.
 - b. Streets, sidewalks, and parking lots will sheet flow to landscaping/bioretenion areas.

Source Control BMPs. Source control BMPs are implemented to eliminate the presence of pollutants through prevention. Such measures can be both non-structural and structural.

1. Non-structural operational source control BMPs include:
 - a. Education for property owners, operator, tenants, occupants, or employees;
 - b. Activity restrictions;
 - c. Irrigation system and landscape maintenance;
 - d. Common area litter control;
 - e. Street sweeping private streets and parking lots; and
 - f. Drainage facility inspection and maintenance.
2. Structural source control BMPs include:
 - a. MS4 stenciling and signage;
 - b. Landscape and irrigation system design;
 - c. Protect slopes and channels; and
 - d. Properly design fueling areas, refuse areas, loading docks, and outdoor material storage areas.

Treatment Control BMPs. Treatment control BMPs supplement the pollution prevention and source control measures by treating the water to remove pollutants before it is released from the project site. The treatment control BMP strategy for the project is to select LID BMPs that promote infiltration and evapotranspiration, including the construction of infiltration basins, bioretention facilities, and extended detention basins. Where infiltration BMPs are not appropriate, bioretention, and/or biotreatment BMPs (including extended detention basins, bioswales, and constructed wetlands) that provide opportunity for evapotranspiration and incidental infiltration may be utilized. Harvest and use BMPs (i.e., storage pods) may be used as a treatment control BMP to store runoff for later non-potable uses.

NOTE: The following changes have been made in response to Comment F-1-78 in Letter F-1 from the Center for Biological Diversity/San Bernardino Valley Audubon Society and F-11-44 in Letter F-11 from the Sierra Club.

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Site-specific WQMPs have not been prepared at this time as no site-specific development project has been submitted to the City for approval. When specific projects within the project are developed, BMPs will be implemented consistent with the goals contained in the master WQMP. All development within the project will be required to incorporate on-site water quality features to meet or exceed the approved Master WQMP's water quality requirements identified previously. This would include the design based on the appropriate pollutant loads for the project from all sources including climate change.

The project will comply with the *Water Quality Management Plan for the Santa Ana Region of Riverside County* (approved by the Santa Ana Regional Water Quality Control Board October 22, 2012), which requires the use of Low Impact Development (LID) BMPs that maximize infiltration, harvest and use, evapotranspiration and/or bio-treatment. Flows from the project will be treated first by LID BMPs where the flow will be infiltrated, evapotranspired, or treated. As required by **Mitigation Measure 4.9.6.1A**, the treated flows will then be reduced to below or equal to pre-development conditions by routing the on-site storm water flows through a series of on-site detention and infiltration basins before flows are released off site. These basins will provide incidental infiltration and secondary treatment downstream of the LID BMPs. All runoff from the site will be treated by LID BMPs and then routed through the detention and infiltration basins before it leaves the project area and into Mystic Lake and the San Jacinto Wildlife Area.

The Water Quality Management Plan Guidance Document for the Santa Ana Region of Riverside County discusses water quality impacts and the use of LID BMPs:

“LID BMPs have been shown in studies throughout the country to be effective and reliable at treating a wide range of Pollutants that can be found in urban runoff, including those listed above, and those subject to adopted TMDLs in the Santa Ana Region of Riverside County (Bacteria and Nutrients). As such, the LID BMPs required in this WQMP are expected to treat discharges of urban-sourced 303(d) listed Pollutants from subject projects to an impaired waterbody on the 303(d) list such that the discharge from the project would not cause or contribute to an exceedance of Receiving Water Quality Objectives.”

The project will comply with the Nutrient TMDL for Lake Elsinore and Canyon Lake by implementing LID-based BMPs. According to the *Comprehensive Nutrient Reduction Plan for Lake Elsinore and Canyon Lake* (prepared for Riverside County Flood Control and Water Conservation District by CDM Smith, January 28, 2013 in compliance with Order No. R8-2010-0033, NPDES Permit No. CAS618033), “Post construction LID based BMPs required for new development and significant redevelopment projects are the only structural watershed based BMPs currently included in the CNRP. The newly developed WQMP requirements ensure that a portion of the wet weather runoff will be contained onsite for all future development projects subject to WQMP requirements. Implementation of WQMP requirements over time coupled with the in lake remediation projects are expected to provide sufficient mitigation of nutrients.”

Specific Plan Design Features. Long-term water quality design is addressed in Section 5.4, *On-site Landscaping*, of the Specific Plan and encourages (a) minimization of urban runoff; (b) minimization of impervious footprint of development; (c) conservation of natural areas; and (d) minimization of directly connected impervious areas. The previous section outlined the BMPs from the Specific Plan that include the following:

1. Maximize the permeable area;
2. Incorporate landscaped buffer areas between sidewalks and streets;
3. Maximize canopy interception and water conservation by preserving existing native trees and shrubs, and planting additional native or drought tolerant trees and large shrubs;

4. Use natural drainage systems;
5. Where soils conditions are suitable, use perforated pipe or gravel filtration pits for low flow infiltration;
6. Construct ponding areas or retention facilities to increase opportunities for infiltration consistent with vector control objectives;
7. Minimize the use of impervious surfaces, such as decorative concrete, in the landscape design;
8. Sites must be designed to contain and infiltrate roof runoff, or direct roof runoff to vegetative swales or buffer areas, where feasible;
9. Where landscaping is proposed, drain impervious sidewalks, walkways, trails, and patios into adjacent landscaping;
10. Increase the use of vegetated drainage swales in lieu of underground piping or imperviously lined swales;
11. Parking areas may be paved with a permeable surface, or designed to drain into landscaping prior to discharging to the MS4; and
12. Where landscaping is proposed in parking areas, incorporate landscape areas into the drainage design.

Figure 4.9.7 summarizes how protection of water quality is incorporated into the project design.

NOTE: The changes to the following mitigation measures have been made in response to Comment B-6-3 in Letter B-6 from the Santa Ana Regional Water Quality Control Board.

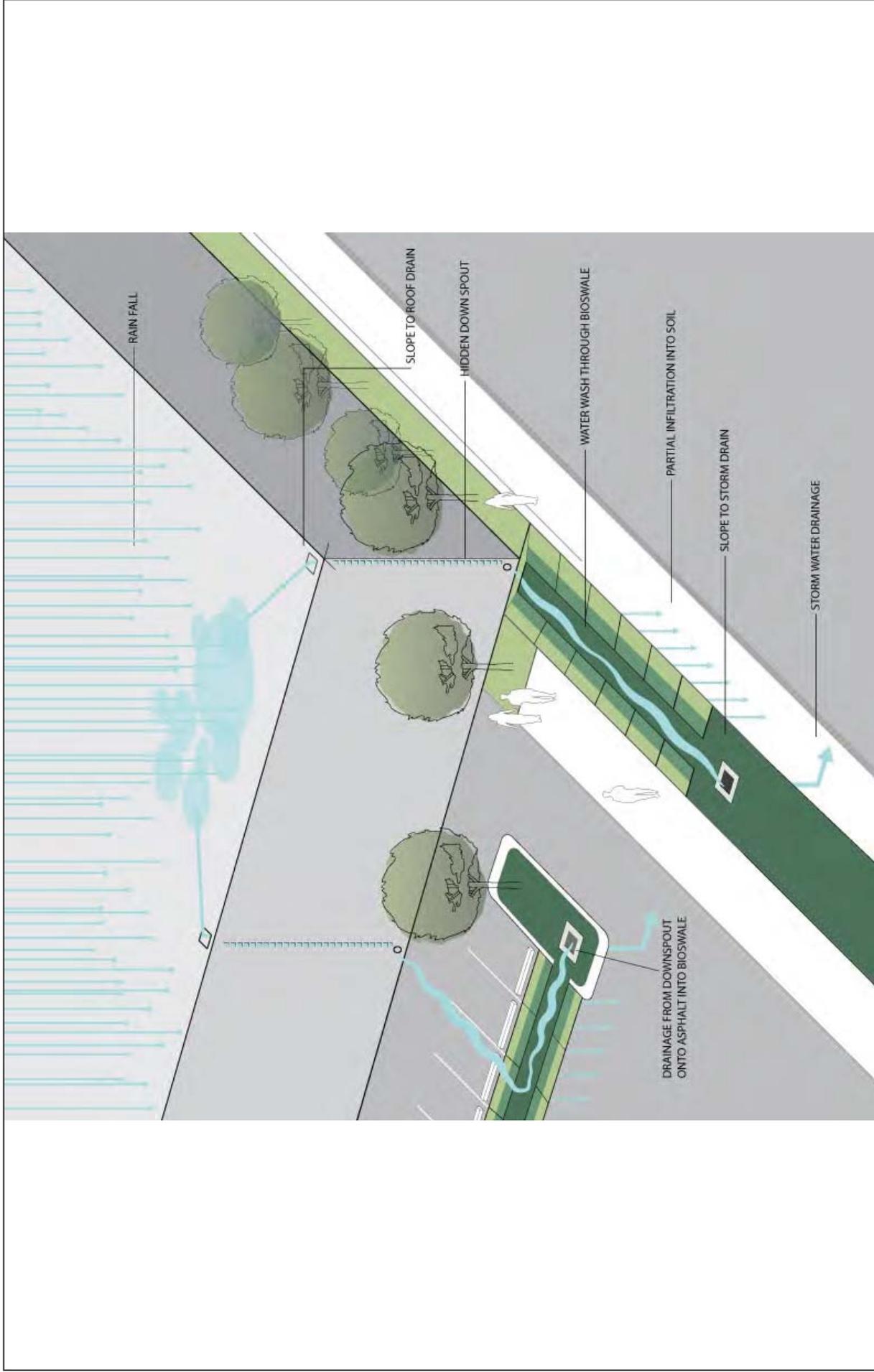
Mitigation Measures. To address potential impacts to water quality during the project's long-term operations, the following measures have been identified:

4.9.6.3A Prior to discretionary permit approval for individual plot plans, a site-specific Water Quality Management Plan (WQMP) shall be submitted to the City Land Development Division for review and approval. The Water Quality Management Plan shall specifically identify site design, source control, and treatment control Best Management Practices that shall be used on site to control pollutant runoff and to reduce impacts to water quality to the maximum extent practicable. The Water Quality Management Plan shall be consistent with the Water Quality Management Plan approved for the overall World Logistics Center Specific Plan project. At a minimum, the site developer shall implement the following site design, source control, and treatment control Best Management Practices as appropriate:

Site Design Best Management Practices

- (a) Minimize urban runoff.
- (b) Maximize the permeable area.
- (c) Incorporate landscaped buffer areas between sidewalks and streets.
- (d) Maximize canopy interception and water conservation by planting native or drought-tolerant trees and large shrubs.
- (e) Use natural drainage systems.
- (f) Where soil conditions are suitable, use perforated pipe or gravel filtration pits for low flow infiltration.
- (g) Construct on-site ponding areas or retention facilities to increase opportunities for infiltration consistent with vector control objectives.

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FIGURE 4.9.7

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- (i) Minimize impervious footprint.
- (j) Construct streets, sidewalks and parking lot aisles to the minimum widths necessary, provided that public safety and a walkable environment for pedestrians are not compromised.
- (k) Reduce widths of street where off-street parking is available.
- (l) Minimize the use of impervious surfaces such as decorative concrete, in the landscape design.
- (m) Conserve natural areas.
- (n) Minimize Directly Connected Impervious Areas (DCIAs).
- (o) Runoff from impervious areas will sheet flow or be directed to treatment control Best Management Practices.
- (p) Streets, sidewalks, and parking lots will sheet flow to landscaping/bioretenion areas that are planted with native or drought tolerant trees and large shrubs.

Source Control Best Management Practices

Source control Best Management Practices are implemented to eliminate the presence of pollutants through prevention. Such measures can be both non-structural and structural:

Non-structural source control Best Management Practices include:

- (a) Education for property owners, operator, tenants, occupants, or employees;
- (b) Activity restrictions;
- (c) Irrigation system and landscape maintenance;
- (d) Common area litter control;
- (e) Street sweeping private streets and parking lots; and
- (f) Drainage facility inspection and maintenance.

Structural source control Best Management Practices include:

- (g) MS4 stenciling and signage;
- (h) Landscape and irrigation system design;
- (i) Protect slopes and channels; and
- (j) Properly design fueling areas, trash storage areas, loading docks, and outdoor material storage areas.

Treatment Control Best Management Practices

Treatment control Best Management Practices supplement the pollution prevention and source control measures by treating the water to remove pollutants before it is released from the project site. The treatment control Best Management Practice strategy for the project is to select Low Impact Development (LID) Best Management Practices that promote infiltration and evapotranspiration, including the construction of infiltration basins, bioretention facilities, and extended detention basins. Where infiltration Best Management Practices are not appropriate, bioretention and/or biotreatment Best Management Practices (including extended detention basins, bioswales, and constructed wetlands) that provide opportunity for evapotranspiration and incidental infiltration may be utilized. Harvest and Reuse Best Management Practice will be used to store runoff for later non-potable uses.

Site-specific Water Quality Management Plans have not been prepared at this time as no site-specific development project has been submitted to the City for approval. When specific projects within the project are developed, Best Management Practices will be implemented consistent with the goals contained in the Master Water Quality Management Plan. All development within the project will be required to incorporate on-site water quality features to meet or exceed the approved Master Water Quality Management Plan's water quality requirements identified previously.

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4.9.6.3B The Property Owners Association (POA) and all property owners shall be responsible to maintain all onsite water quality basins according to requirements in the guidance Water Quality Management Plan and/or subsequent site-specific Water Quality Management Plans, and established guidelines of the Regional Water Quality Control Board. Failure to properly maintain such basins shall be grounds for suspension or revocation of discretionary operating permits, and/or referral to the Regional Water Quality Control Board for review and possible action. This measure shall be implemented to the satisfaction of the City Land Development Division, in consultation with the City Engineer, and Regional Water Quality Control Board.

The changes to the following mitigation measure has been made in response to Comment B-3-39 in Letter B-3 from the California Department of Fish and Wildlife, Comment B-6-3 in Letter B-6 from the Santa Ana Regional Water Quality Control Board, and other similar comments.

4.9.6.3C Prior to issuance of future discretionary permits for any development along the southern boundary of the World Logistics Center Specific Plan (WLCSP), the project developer of such sites, in cooperation with the Property Owners Association (POA), shall establish and annually fund a Water Quality Mitigation Monitoring Plan (WQMMP) to confirm that project runoff will not have deleterious effects on the adjacent San Jacinto Wildlife Area (SJWA). This program shall include at least quarterly sampling along the southern boundary of the site (i.e., at the identified outlet structures of the project detention basins) during wet season flows and/or when water is present, as well as sampling of any dry-season flows that are observed entering the San Jacinto Wildlife Area property from the project property, including Drainage 9, which is planned to convey only clean off-site flows from north of the World Logistics Center Specific Plan site across Gilman Springs Road. The program shall also include at least twice yearly sampling after completion of construction, and a pre-construction survey must be completed to determine general water quality baseline conditions prior to and during development of the southern portion of the World Logistics Center Specific Plan. This sampling shall be consistent with and/or comply with the requirements of applicable Storm Water Pollution Prevention Plans (SWPPPs) for the development site.

The project developer of sites along the southern border of the World Logistics Center Specific Plan shall be responsible for preventing or eliminating any toxic pollutant (not including sediment) found to exceed applicable established public health standards. In addition, the discharge from the project shall not cause or contribute to an exceedance of Receiving Water Quality Objectives for the potential pollutants associated with the project as identified in Table 4.9.J. Once development is complete, the developer shall retain qualified personnel to conduct regular (i.e., at least quarterly) water sampling/testing of any basins and their outfalls to ensure the San Jacinto Wildlife Area will not be affected by water pollution from the project site. This measure shall be implemented to the satisfaction of the City Land Development Division Manager based on consultation with the project developer, Eastern Municipal Water District, the Regional Water Quality Control Board-Santa Ana Region, and the Mystic Lake Manager.

Level of Significance After Mitigation. The proposed project incorporates on-site drainage control structures and programs sufficient to meet the applicable Federal, State, and local water quality requirements. Through the use of site design BMPs, source control BMPs (e.g., street and parking lot sweeping and vacuuming), and treatment control BMPs (e.g., infiltration basins, bioretention areas, and pervious pavement), the resulting pollutant loads coming from the project will be reduced, thereby reducing pollutants discharged from urban storm water runoff to surface water bodies. Compliance with the requirements of the NPDES permit, which include implementation of the BMPs outlined in the WQMP, will be enforced by the City during the ongoing operation of the project.

Implementation of **Mitigation Measures 4.9.6.3A** through **4.9.6.3C** will help to reduce potential water quality impacts resulting from storm water and urban runoff to less than significant levels.

4.9.7 Cumulative Impacts

Cumulatively, development within the watershed will result in an increase in impervious surfaces in addition to changes in land use and associated pollutant runoff characteristics. Increased impervious surfaces are likely to alter existing hydrology and increase potential pollutant loads. However, all future development in the City and throughout the Santa Ana RWQCB will be required to comply with the requirements of the NPDES permit program. Continued growth is anticipated to occur in the City and surrounding areas and all new development and significant redevelopment will be required to minimize its individual impacts to water quality and pollutant transport through implementation of BMPs. Therefore, since all new developments will be required to mitigate for impacts to water quality, a less than significant cumulative impact to water quality will occur.

Cumulatively, continued development within the West San Jacinto Groundwater Management Plan area will result in an increase in demand on water sources, including both surface and groundwater supplies. Since the majority of the projects within the Plan area obtain water service from the EMWD, most of the cumulative development will rely on imported water purchased from Metropolitan with supplements from local groundwater sources. As stated in the previous Section 4.9.5.3, there has been a shift in the water demand patterns in the last 15 years, as a residential market has replaced an agricultural market, with a resulting incremental increase in urban-related surface and groundwater pollution. The proposed project will make an incremental contribution to production of urban pollutants, but the site-specific water quality Best Management Practices will help ensure that these contributions will not make a significant contribution to any cumulatively considerable regional water quality impacts.

The EMWD's Urban Water Management Plan (UWMP) concludes that the EMWD has sufficient supplies of local groundwater and imported surface water to accommodate existing and planned development, including the proposed project, as documented in the project's Water Supply Assessment (see Appendix M). For these reasons, the proposed project will not make a significant contribution to any cumulatively considerable surface water or groundwater supply impacts.

The drainage system for the proposed project will be designed so that peak flows from post-development runoff are equal to or less than historic conditions at any given off-site discharge location and no additional mitigation measures are proposed for cumulative impacts. This same requirement will be placed on all other development in the vicinity of the project site by the City of Moreno Valley. The proposed project, including implementation of its master drainage plan, will not make a significant contribution to any cumulatively considerable impacts related to drainage or water quality on a local or regional basis.

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NOTE TO READERS. *Although there were numerous questions about potential impacts to the City Housing Element, no major revisions have been made to this section based on the response to comments in Final Programmatic EIR Volume 1.*

4.10 LAND USE AND PLANNING

This section of the EIR addresses the land use impacts that will result from the change from the existing on-site land uses to the proposed land uses. In addition, this section analyzes the consistency of the proposed WLC project with the goals and policies of the City of Moreno Valley General Plan, applicable community plans, and the Zoning Code, and compatibility within local and regional plans. This section also identifies and evaluates the compatibility of the proposed WLC project with existing land uses and the potential land use impacts that may result during or subsequent to development of the proposed on-site uses.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The following technical study was prepared to support the analysis of potential impacts in this section:

- David Taussig and Associates, Inc. (DTAA). *Fiscal and Economic Impact Study*, Draft dated March 13, 2012, revised report dated September 2014.

The analysis contained in this section is also based on the following reference documents:

- *City of Moreno Valley General Plan*, City of Moreno Valley, 2006;

- *Updated and Certified City of Moreno Valley Housing Element*, 2011;
- *Municipal Code*, City of Moreno Valley, codified through February 12, 2012;
- *Final Sustainable Communities Strategies Plan*, Southern California Association of Governments (SCAG), April 2012;
- *Final 2008 Regional Comprehensive Plan*, SCAG, October 2008;
- *Final 2012 Regional Transportation Plan*, SCAG, adopted April 2012;
- *Final 2010 Urban Water Management Plan*, Eastern Municipal Water District (EMWD), approved December 2010;
- *Riverside County Airport Land Use Compatibility Plan, Volume 1*, Riverside County Airport Land Use Commission (ALUC), October 14, 2004;
- *Water Quality Control Plan Santa Ana River Basin (8)*, California Regional Water Quality Control Board (RWQCB), approved January 24, 1995;
- *Western Riverside County Multiple Species Habitat Conservation Plan*, Volume I, Part I, Dudek & Associates, June 17, 2003; and
- *Draft Environmental Impact Report, Highland Fairview Corporate Park*. (Skechers), Michael Brandman Associates, August 4, 2008.

4.10.1 Existing Setting

The project area includes two adjacent areas, the WLC Specific Plan Area and the General Plan Amendment Area. The two areas combined make up most of the older Moreno Highlands Specific Plan.

4.10.1.1 Project Location

The proposed WLC project area is located in the northwestern Riverside County, within the eastern portion of the City of Moreno Valley. The proposed WLC project is situated generally south of SR-60, between Redlands Boulevard and Gilman Springs Road (the easterly City limit), extending to the southerly City limit. Previously referenced Figure 1.2 in Section 1.0, *Executive Summary*, depicts the proposed WLC project boundary on the applicable U.S. Geological Survey (USGS) Quad sheets.

4.10.1.2 Existing On-site Land Uses

The project area is largely undeveloped land and Figure 4.10.1 shows an aerial view of existing land uses. Presently, there are seven single-family homes in various locations on the property along with associated ranch/farm buildings. Most of the site has been used for dry farming at one time or another since the early 1900s, and much of the site continues to be used for dry farming at the present time. San Diego Gas & Electric (SDG&E) operates a natural gas compressor station, known as the Moreno Compressor Station, on 18 acres in the southern portion of the site. Southern California Gas Company (SCGC) operates a valving, metering, and pipe cleaning station on a one-acre parcel in the south-central portion of the site.

4.10.1.3 Existing Roadways

The major roadways that currently provide access to the WLC project area are SR-60 (the Moreno Valley Freeway), Redlands Boulevard, Alessandro Boulevard, Gilman Springs Road, and Theodore Street. Redlands Boulevard and Theodore Street are north-south collector roadways that intersect

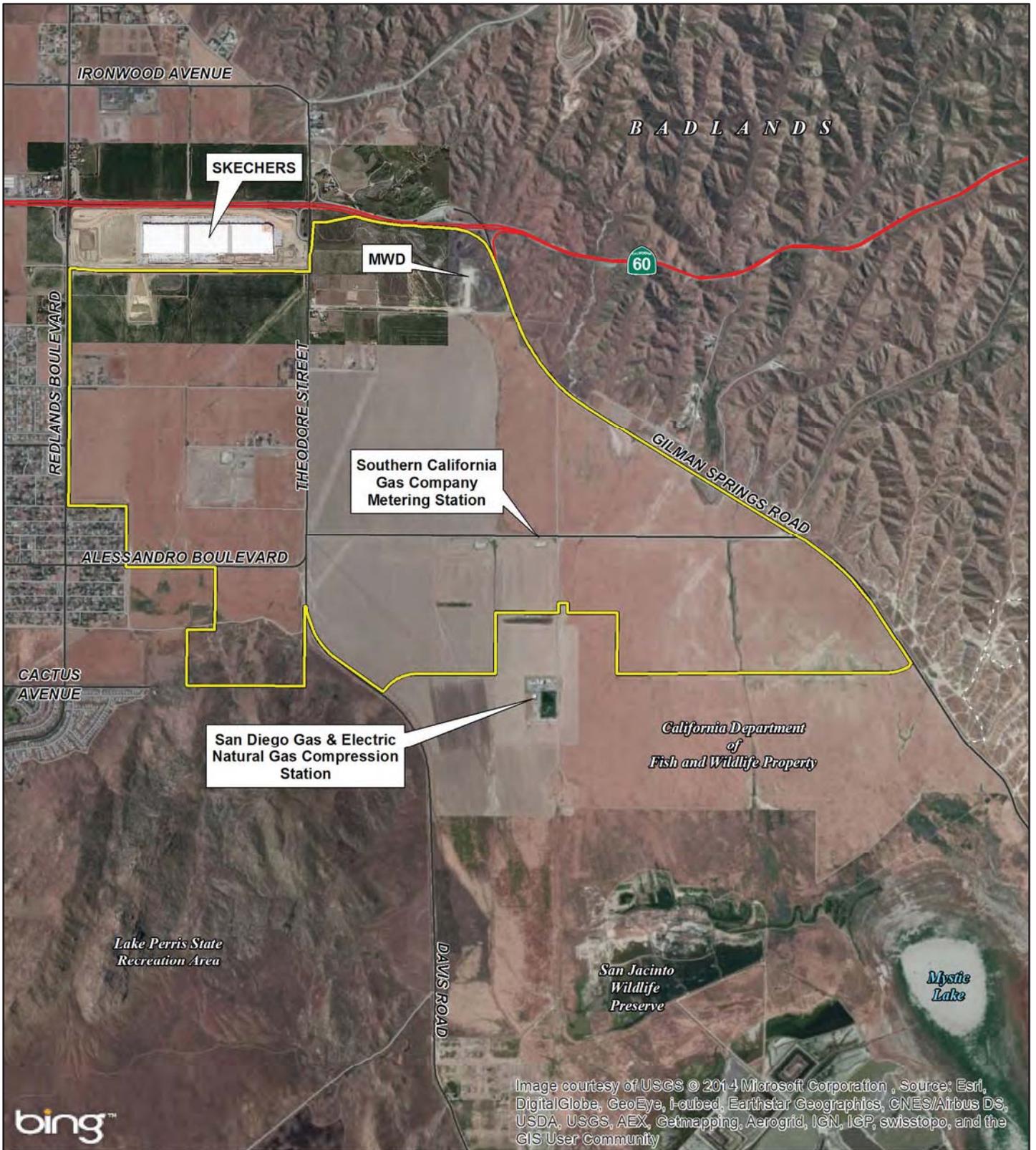
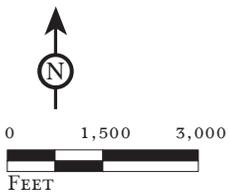


FIGURE 4.10.1

LSA



Project Boundary

World Logistics Center Specific Plan Project
Environmental Impact Report

Aerial Photograph

SOURCE: ESRI World Imagery, 2010; Bing Maps, 2010; Google Maps, 2011.

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with SR-60. Alessandro Boulevard is an east-west thoroughfare that runs through Moreno Valley from Interstate 215 (I-215) on the west to Gilman Springs Road on the east. Gilman Springs Road runs in a northwesterly-southeasterly direction connecting SR-60 to the Hemet-San Jacinto area and State Route 79 (SR-79).

4.10.1.4 General Surrounding Land Uses

To the west of the proposed WLC project area are more developed portions of the City of Moreno Valley. Near the southern and western boundaries of the proposed project are existing residential neighborhoods along the west sides of Redlands Boulevard and Merwin Street; a small market and a Post Office are also located near Redlands and Alessandro Boulevards. A new industrial warehouse project (Westridge) was recently approved just west of Redlands Boulevard and south of SR-60 but it has been challenged in court. Another large warehouse project (ProLogis Eucalyptus Industrial Park) is currently being processed by the City just west of the Westridge project and is due to be considered by the City Council in December 2014. Farther to the west, there is a variety of commercial and auto sales uses along Moreno Beach Drive.

Highland Fairview Corporate Park (HFCP), located north and west of the project area between Redlands Boulevard and Theodore Street, is currently under development and the first phase was completed in late 2011 (Skechers). The area north of SR-60 is largely undeveloped with clusters of low-density residential development within the Moreno Valley city limits.

There is little development adjacent to the east and south boundaries of the project area. The area easterly of the project, commonly referred to as the Badlands, is a rugged area that separates the City of Moreno Valley from San Timoteo Canyon and the City of Beaumont. Most of the Badlands area north of SR-60 is incorporated into the Norton Younglove Reserve. Due to its reserve status, steep slopes and canyons, the Badlands area has experienced little development; however, there are scattered single-family homes in the area east of Gilman Springs Road. The Badlands Sanitary Landfill, operated by the County of Riverside Waste Management Department, is located approximately 1.5 miles northeasterly of the project area in the Badlands.

The area south of the proposed project site is the San Jacinto Wildlife Area (SJWA), which includes an Upland Game Hunting Area and is adjacent to the Lake Perris State Recreation Area. These lands are State-owned and access to these areas is restricted. The SJWA is owned and operated by the California Department of Fish and Wildlife (CDFW) and contains approximately 9,000 acres of restored wetland and ponds. The Lake Perris State Recreation Area is owned and operated by the California State Parks Department and contains approximately 6,000 acres of open space land, which is used both for recreation and preservation of the natural southern California landscape.

In 1981–82, the State Wildlife Conservation Board initially purchased 15,000 acres of the Mystic Lake area as mitigation for habitat impacts associated with the construction of the State Water Project. This area was designated as the SJWA. In 1995, the Board acquired an additional 921 acres of upland farmland within the southern portion of the Moreno Highlands Specific Plan (MHSP) property to incorporate into the SJWA. In 2001, the Board acquired an additional 274 acres in this same area. This land was purchased to provide a buffer between the land surrounding Mystic Lake and the planned urban development within Moreno Valley. The Board action on this purchase indicated the land was to “facilitate restoration of historic water flows back into the lake bed and allow for reversion back to wetlands during wet years, and areas of low vegetation cover during dry years, all providing significant habitat for species using the SJWA, including a number of state and federally listed species.”¹

Most of the State-owned land south of the project area is referred to as the SJWA. However, the land purchased out of the Moreno Highlands Specific Plan is referred to in this EIR as the CDFW

¹ Wildlife Conservation Board minutes from May 18, 2001.

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Conservation Buffer Area to denote the reason for its original purchase. The 1,195 acres acquired by the Wildlife Board during the past 20 years was intended to serve as an effective buffer between the SJWA and the development expected to occur north of the SJWA area (the present mixed-use Moreno Highlands Specific Plan). Currently, this acreage provides not only a buffer area, but also provides open space for raptor and bird foraging habitat, and is actively farmed under CDFW contract. The proposed project will permanently designate this CDFW Conservation Buffer Area as Open Space under the City General Plan. It is anticipated the State would maintain its function as a buffer and also as foraging habitat for raptors as long as it is regularly tilled. There are no plans to alter the current agricultural use of the property.

There are two future commercial areas located immediately north of the project area. The first is located at the northwest corner of Theodore Street and Eucalyptus Avenue (proposed 80,000 square feet) and the second is at the northeast corner of Redlands Boulevard and Eucalyptus Avenue (proposed 120,000 square feet). The nearest large-scale commercial development is located on the south side of SR-60 at Moreno Beach Drive approximately 1.25 miles to the west of the proposed WLC project; this shopping complex includes Walmart and Target along with restaurants and ancillary commercial and service uses, as well as the Moreno Valley Auto Center. The central core of Moreno Valley, which includes residential neighborhoods and commercial activity, is located approximately three miles west of the project area.

March Air Reserve Base (MARB) is located approximately seven miles southwesterly of the WLC planning area. The MARB is under the authority of the March Joint Powers Authority, which acts as the land use authority, the Redevelopment Agency and Airport Authority (the March Inland Port Airport Authority) for reuse of the former March Air Force Base.

**4.10.1.5 Existing General Plan, Specific Plan, and Zoning Land Use Designations
Applicable to the Proposed WLC Project Site**

The Community Development Element of the City’s General Plan currently designates the project area as a mix of residential and associated uses, commercial, business park, and open space land uses. In 1992, the City approved the 3,038-acre Moreno Highland Specific Plan (MHSP) as a master planned, mixed-use community, consisting of up to 7,763 residential dwelling units and associated uses (on approximately 2,435 acres) and approximately 603 acres of business, retail, institutional, and other uses. The Moreno Highland Specific Plan is incorporated into the City’s General Plan (Table 4.10.A).

Table 4.10.A: Moreno Highlands Specific Plan (Current Land Use Designations)

Land Use	Acreage
Residential Community	
Residential (7,763 dwelling units)	1,359.3
Parks and Open Space	701.9
Neighborhood Commercial	10.0
Cemetery	16.5
Public Facilities	347.7
Planned Business Center	
Business Park	360.8
Mixed Use	80.5
Community Commercial	16.0
Parks and Open Space	77.9
Public Facilities	67.4
Project Total	3,038

Adopted by City Council March 17, 1992

The MHSP called for the development of an approximately 7,300 new residential units in the City of Moreno Valley. However, as discussed below, the City of Moreno Valley already has a very low jobs-to-housing ratio, meaning that the City has a surplus of housing as compared to jobs. This reduces the demand for new housing in the area, and implementation of the MHSP would further lower the jobs/housing ratio. In addition, the 2008–2009 recession resulted in a substantial reduction of housing prices in the Inland Empire, the State of California, and throughout most of the U.S. As is well documented in the press, foreclosure rates became very high, and the demand for newly constructed housing has been greatly reduced. Therefore, the current demand for housing development on the site is greatly limited. As such, none of the MHSP has been implemented.

In February 2011, the City adopted an updated Housing Element that identified the MHSP project area as a potential location for future jobs-producing land uses, rather than residential uses. In April 2011, the City adopted its Economic Development Action Plan, which identified eastern Moreno Valley as a potential area for major job-producing land uses. The proposed WLC Specific Plan project is consistent with this planning prerogative, and seeks to comprehensively plan the project area for jobs-producing land uses.

4.10.1.6 Surrounding Land Uses

South of SR-60/East of Redlands Boulevard. The HFCP project is currently under development. Phase 1 (Skechers North American Operational Headquarters) was completed in late 2011. HFCP is located immediately north and west of the project area, on the north side of Eucalyptus Avenue between Redlands Boulevard and Theodore Street. The HFCP project was approved by the City of Moreno Valley in 2009. The City General Plan land use designation for the site is Commercial (C) and Business Park/Light Industrial (BP/LI).

North of SR-60. The land located on the north side of SR-60 and westerly of Theodore Street is within the City of Moreno Valley and has a land use designation of Office (O) and Residential (R1-density of one dwelling unit per acre). The area easterly of Theodore Street is unincorporated within the County of Riverside with land use designations of Scenic Highway Commercial (C-P-S) and Controlled Development Area (W-2). The W-2 area allows single-family residential and light agriculture (the suffix indicates a 2-acre minimum parcel size); and the C-P-S district allows certain wholesale and retail commercial uses. This County territory is within the City's Sphere of Influence; the City land use designation for the area is Rural Residential (RR) and Residential (R1).

East of Gilman Springs Road. The Badlands area, easterly of Gilman Springs Road, is unincorporated within the jurisdiction of the County of Riverside and has a land use designation of Controlled Development Area (W-2, W-2-1, and W-2-20); allowed uses include single-family residential and light agriculture (the suffix indicates minimum parcel size in acres). This County territory is also within the City's Sphere of Influence and the City land use designation for the area is Rural Residential (RR).

Southern Boundary. The land area to the south of the project is within the SJWA and the Lake Perris State Recreation Area. Portions of these facilities are within the City limits and have a City General Plan land use designation of Open Space (OS).

West of Redlands Boulevard. The City land use designations for the residential areas west of Redlands Boulevard are Residential R2 and R3 (maximum density of 2 and 3 dwelling units per acre,

respectively). Residential areas southerly of the site along Alessandro Boulevard are subject to City land use designations of R2 and R5 (maximum density of 2 and 5 dwelling units per acre).

4.10.1.7 Project Components

The project components are described in detail in Section 3.4, *Project Characteristics*. The City of Moreno Valley is the Lead Agency for the proposed WLC project. The entitlements necessary for the proposed WLC project include approval of the following:

- General Plan Amendment(s) for the former MHSP site to Business Park/Light Industrial (BP/LI);
- World Logistics Center Specific Plan with Logistics Development (LD) and Light Logistics (LL) zones;
- Corresponding Zone Change to Specific Plan for the WLCSP and redesignate the CDFW Conservation Buffer Area as Open Space and the natural gas facilities as Public Facilities
- Development Agreement for parcels owned by the project applicant;
- Tentative Parcel Map (for financing purposes only); and
- Annexation of an 85-acre parcel along Gilman Springs Road.

In addition, the project will require other associated actions and approvals by other public entities in order to construct and operate the proposed WLC project.

General Plan Amendment. The General Plan Amendment proposes a revision to the City General Plan land use designations for the entire MHSP area, including the project area as set forth in the proposed WLC Specific Plan. The General Plan Amendment also includes amendments to the following elements: (a) Community Development; (b) Parks, Recreation and Open Space; (c) Circulation; (d) Environmental Safety; and (e) Conservation. With these amendments, these elements will be modified to authorize the World Logistics Center Specific Plan and designate the WLC property for Business Park/Light Industrial (BP/LI) land uses.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

Specific Plan. The proposed WLC project includes the 2,610-acre World Logistics Specific Plan to implement the logistics and industrial portion of the General Plan Amendment and to set forth comprehensive land use regulations governing the proposed WLC project. The World Logistics Center Specific Plan is a master plan for the development of approximately 40.6 million square feet of modern high-cube logistics warehouse distribution facilities and up to 200,000 square feet of light logistics uses.

The Specific Plan establishes the master plan of development for the project area, including development standards and use regulations, a master plan for circulation and infrastructure, architectural, landscape and design guidelines and sustainability goals, all of which will be applicable to all development within the developable project area.

Within the Specific Plan, the primary land use category will be Logistics Development. This use will provide for high-cube logistics warehouse space consisting of buildings of 500,000 square feet or greater, with ceiling heights of approximately 60–80 feet. Warehousing and logistics activities consistent with the storage and processing of manufactured goods and materials prior to their distribution to other facilities and retail outlets will be permitted within this category. Ancillary office and maintenance space will be permitted, along with the outdoor storage of trucks, trailers, and shipping containers.

Change of Zone. The Change of Zone will establish the World Logistics Center Specific Plan, which will replace most of the Moreno Highlands Specific Plan and rezone several other properties. It will also redesignate the CDFW Conservation Buffer Area as Open Space and the natural gas facilities as Public Facilities. The WLCSP property will have two new land use zones, Logistics Development (LD) and Light Logistics (LL).

Annexation. The project includes the annexation by the City of an 85-acre parcel located on the north side of Alessandro Boulevard at Gilman Springs Road. This parcel is already within the City’s Sphere of Influence. The proposed project includes pre-annexation General Plan land use designations and zoning for this parcel, and the EIR will be the environmental documentation used by the Local Agency Formation Commission (LAFCO) to complete the annexation process. The County’s land use designation currently applicable to this parcel is W-2-2½. The W-2 area allows single-family residential and light agriculture (the suffix indicates minimum parcel size in acres) and the City’s current General Plan land use designation for the site is Business Park (BP). This project proposes to incorporate this property into the World Logistics Center Specific Plan.

4.10.1.8 General Plan and Zoning Designations

Table 4.10.B compares the existing and proposed land uses in the project vicinity.

Table 4.10.B: Existing and Proposed Land Uses in the Project Vicinity

Location	Current Land Uses	Existing General Plan Land Uses	Proposed General Plan and Specific Plan/ Zoning Designations
On-site	Agricultural/ undeveloped	Moreno Highlands Specific Plan with Residential, Commercial, Public Facilities, Business Park, Open Space, Mixed Use	Business Park/Light Industrial (BP/LI) with the World Logistics Center Specific Plan Specific Plan including Logistics Development (LD), Light Logistics (LL), and Open Space (OS).
North of Site/ South of SR-60	Highland/ Fairview Corporate Park	Commercial/Light Industrial	No Change
North of Site/ North of SR-60	Low Density Residential/ Agriculture	Low Density Residential/ Office Strip along freeway	No Change
South	Open Space	Open Space	No Change
East	Open Space	Open Space	No Change
West	Residential/ Undeveloped	Residential	No Change

4.10.2 Applicable Regulations

The following goals, objectives, and policies of the City of Moreno Valley General Plan are applicable to the proposed WLC project:

Section 9.2.2 Community Development

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.

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.

- Goal 2.3** Achieves an overall design statement that will establish a visually unique image throughout the City.
- Objective 2.1** Balance the provision of urban and rural lands within Moreno Valley by providing adequate land for present and future urban and economic development needs, while retaining the significant natural features and the rural character and lifestyle of the northeastern portion of the community.
- Objective 2.5** Promote a mix of industrial uses which provide a sound and diversified economic base and ample employment opportunities for the citizens of Moreno Valley with the establishment of industrial activities that have good access to the regional transportation system, accommodate the personal needs of workers and business visitors; and which meets the service needs of local businesses.
- Policy 2.5.1** The primary purpose of areas designated Business Park/Industrial is to provide for manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities. The zoning regulations shall identify the particular uses permitted on each parcel of land. Development intensity should not exceed a Floor Area Ratio of 1.00 and the average floor area ratio should be significantly less.
- Policy 2.5.2** Locate manufacturing and industrial uses to avoid adverse impacts on surrounding land uses.
- Policy 2.5.3** Screen manufacturing and industrial uses where necessary to reduce glare, noise, dust, vibrations and unsightly views.
- Policy 2.5.4** Design industrial development to discourage access through residential areas.

Section 9.6.2 Safety Element

- Objective 6.6** Promote land use patterns that reduce daily automotive trips and reduce trip distance for work, shopping, school, and recreation.

4.10.3 Methodology

The focus of the land use analysis is on land use impacts that would result from implementation of the proposed WLC project. Land use conflicts are identified and evaluated based on existing land uses, land uses proposed as part of the project, land use designations, and standards and policies related to land use. Land use compatibility is based on the intensity and patterns of land use to determine whether a project would result in incompatible uses or nuisance impacts to sensitive receptors (e.g., residences, medical facilities, or schools).

An evaluation of the potential land use impacts associated with implementation of the proposed WLC project is based on review of the Moreno Valley General Plan and associated Final EIR, the Moreno Valley Municipal Code, SCAG Regional Comprehensive Plan, SCAG Regional Transportation Plan, SCAG Compass Growth Vision, SCAQMD Air Quality Management Plan, Santa Ana Water Quality Control Plan, Riverside County Drainage Area Management Plan, and the EMWD Urban Water Management Plan. Compatibility of the proposed WLC project with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is discussed in Section 4.4, *Biological Resources*.

4.10.4 Thresholds of Significance

Appendix G of the *CEQA Guidelines* recognizes the following significance thresholds related to land use. Based on these significance thresholds, potential impacts to land use could be considered significant if the proposed WLC project would result in the following:

- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, Specific Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; and/or
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

4.10.5 Less than Significant Impacts

The following potential impacts were determined to be less than significant. In each of the following issues, either no impact would occur (therefore, no mitigation would be required) or adherence to established regulations, standards, and policies would reduce potential impacts to a less than significant level.

4.10.5.1 Conflict with Any Applicable Habitat or Natural Community Conservation Plan

Threshold	Would the proposed WLC project conflict with any applicable habitat conservation plan or natural community conservation plan?
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Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The project site is located within the MSHCP area, Mead Valley and Reche Canyon/Badlands Plan Area.¹ The MSHCP is a comprehensive, multi-jurisdictional effort that includes Riverside County and fourteen cities to provide a regional approach to conservation planning. Portions of the project area occur in 14 criteria cells of the MSHCP. The project site is not located within any special linkage areas identified by the MSHCP. The project applicant, the City, and the County² are required to use the Joint Project Review (JPR) process established in the MSHCP to identify and acquire habitat as part of the development review process. The JPR process involves negotiations between a landowner and the Western Riverside County Regional Conservation Authority (RCA) so the County can acquire land with important habitat or other biological resources while providing fair compensation and/or reasonable development opportunities on the remaining land for the landowner.

The project site is located within areas requiring burrowing owl surveys, within the MSHCP Criteria Area Species Survey Area (CASSA), and Narrow Endemic Plant Species Survey Area (NEPSSA).

Because the project site is within an MSHCP CASSA and is considered to be a covered activity, the project is subject to provisions of the MSHCP. In particular, the project proponent will be required to provide payment of mitigation fees and adhere to the BMPs found in Appendix C of the MSHCP. Pursuant to agreements with the U.S. Fish and Wildlife Service (USFWS) and the CDFW, the payment of the mitigation fees and compliance provisions of the MSHCP provides full mitigation under CEQA, the Federal Endangered Species Act (FESA), and the California Endangered Species Act (CESA) for impacts to the species and habitats covered by the MSHCP. Since the City has adopted the MSHCP and its requirements and provisions, and since the project is within Moreno Valley, the proposed WLC project would be required to adhere to applicable MSHCP requirements

¹ *Multiple Species Habitat Conservation Plan Compliance Report*, Michael Brandman Associates. September 20, 2014.
² Western Riverside County Regional Conservation Authority (RCA)

and fees. Therefore, the WLC project was determined to be consistent with the MSHCP proposed WLC project (see Section 4.4, *Biological Resources*).

4.10.5.2 Conflict with Applicable Land Use Plans, Policies, or Regulations (Regional)

Threshold	Conflict with any applicable regional land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, Specific Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
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Section 15125 (d) of the *CEQA Guidelines* requires EIRs to “discuss any inconsistencies between the proposed project and applicable general plans and regional plans.” The objective of such a discussion is to find ways to modify a project, if warranted, to eliminate any identified inconsistencies with relevant plans and policies, and thereby avoid creating an impact to the environment that consistency with the plan would otherwise mitigate. Pursuant to *CEQA Guidelines* Section 15125 (d), this EIR section includes an evaluation of the consistency of the proposed WLC project with pertinent goals and policies of relevant adopted local and regional plans. Because certain plans are more specifically tailored to other issue areas, such as air quality, transportation, biology, hazards, water quality, and water supply, the local and regional plans identified below are addressed in detail in other sections of this EIR. The following analysis evaluates the proposed project against all the applicable regional planning documents and processes, while the following Section 4.10.6.1 evaluates the project relative to the City of Moreno Valley General Plan.

Airport Regulations. MARB is a joint-use airport, used for military and civilian purposes, located seven miles west of the project site. The project area is outside of any Federal or State regulation related to MARB. The project is also outside of any areas regulated by the Riverside County Airport Land Use Plan (ALUP). Therefore, the project does not have a conflict with the ALUP and no impact will occur.

SCAG Applicable Regional Plans. On April 4, 2012, the SCAG approved the year 2012 Regional Transportation Plan (RTP)/Sustainable Communities Plan (SCS). This section evaluates consistency with both the SCAG 2008 RTP and the SCAG 2012 RTP.

SCAG 2008 Regional Comprehensive Plan (RCP), Regional Transportation Plan (RTP), and Compass Growth Vision (Compass): The SCAG (the designated Metropolitan Planning Organization [MPO] for the Counties of Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles) is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. With its members and other regional planning entities, the SCAG prepared the 2008 RCP to serve as a framework to guide decision-making with respect to the growth and changes that can be anticipated in the region for the 2008–2012 timeframe. The RCP is a major advisory plan prepared by the SCAG that addresses important regional issues like housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance.

The RCP identifies voluntary best practices to approach growth and infrastructure challenges in an integrated and comprehensive way. It also includes goals and outcomes to measure progress toward a more sustainable region. The RCP includes nine chapters, each based on specific areas of planning or resource management. Each of the nine chapters contains goals, policies, implementation, and strategies to achieve the SCAG’s overall goals of improving the standard of

living for all; improving the quality of life for all; and enhancing equity and access to government. Local governments are required to use the RCP as the basis for their own plans and are required to discuss the consistency of projects of “regional significance” with the RCP.

Regional Comprehensive Plan: The RCP’s overall goal is to reinvigorate the region’s economy, avoid social and economic inequities and the geographical dislocation of communities, and to maintain the region’s quality of life. The document is described as a regional policy framework for future land use decisions in the SCAG area that respects the need for strong local control, but that also recognizes the importance of regional comprehensive planning for issues of regional significance. The RCP is laid out much like a General Plan and organizes recommended policies into nine chapters. The highlight of each chapter is the regional strategy that addresses the RCP’s vision for that resource area. As such, each chapter includes three levels of recommendations for the region:

- *Goals.* Each goal will help define how sustainability is defined for that resource area.
- *Outcomes.* These focus on quantitative targets that define progress toward meeting the RCP’s Goals. Where possible, they are clearly defined (e.g., a 20% reduction in greenhouse gas emissions from 2007 levels), capable of being monitored with existing or reasonably foreseeable resources, and have a strong link to sustainability goals.
- *Action Plan.* This critical part of the RCP lays out a comprehensive implementation strategy that recommends how the region can systematically move to meet the RCP’s quantitative Outcomes and achieve its Goals, Guiding Principles, and Vision. Each Action Plan contains:
 - *Constrained Policies.* This includes a series of recommended near-term, feasible policies that stakeholders should consider for implementation. For example, the RCP calls on the SCAG to adopt policies that reflect its role as a planning agency, council of governments, and metropolitan planning organization. The RCP also recommends voluntary policies for consideration by local governments and other key stakeholders.
 - *Strategic Initiatives.* This encompasses longer-term strategies that require significant effort to implement but are necessary to achieve the RCP’s desired Goals and Outcomes. For example, identifying technological breakthroughs that can reduce air pollution from the transportation sector requires both commitment and time. Most of these initiatives are not constrained and will require political will, enabling legislation, new funding sources, and other key developments to become a reality. In most cases, this tier of strategies is the key to achieving the region’s sustainability Goals and Outcomes.

Other policies contained within the 2008 RCP were either not applicable to the proposed WLC project or are directed at the SCAG and actions that the SCAG would undertake at the regional level that would not pertain directly to the proposed WLC project. Policies within the 2008 RCP that are applicable to the proposed WLC project were identified and are discussed below.

Land Use and Housing Chapter

Goal *Focusing growth in existing and emerging centers and along major transportation corridors.*

Consistent. The proposed WLC project site is currently either underdeveloped or used for agriculture. Regional access to the City and project area is provided from SR-60, which runs east-west just north of the project site. SR-60 provides direct access to the site via interchanges at Redlands Boulevard, Theodore Street, and Gilman Springs Road.

According to the City’s “Rancho Belago Development Strategy” adopted in 2011, the proposed WLC project would occur in an area acknowledged by the City as appropriate for this type of development. The existing roadway system and infrastructure surrounding the project site will be utilized to the maximum extent possible, and the proposed WLC project will install improvements and/or pay necessary fees to facilitate the continuation of satisfactory operation. The proposed WLC project is

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consistent with this SCAG policy in that it exists along a major transportation corridor of the City and will be connecting to the existing utilities underlying the arterial roadways.

Goal *Targeting growth in housing, employment, and commercial development within walking distance of existing and planned transit stations.*

Consistent. The proposed WLC project would comply with all City development policies, standards, and programs pertaining to supporting alternative modes of transportation included in the General Plan Circulation Element. In addition, the proposed WLC project is located within an urbanizing area of the City. As provided in the discussion on cumulative projects (Section 4.10.7), the approved and planned development in the project area includes residential, commercial, and industrial uses. As such, the project site is in an area that is developing with projects that have already been approved and constructed, or are in the various stages of the planning process.

Transit service in Moreno Valley is provided by the Riverside Transit Authority (RTA), which provides two routes in the vicinity of the proposed development:

- Route 35, which runs along Eucalyptus Street, Moreno Beach Boulevard, and SR-60; while this route does not directly serve the project site, it could be readily rerouted through the site.
- Route 20, which runs along the southerly portion of Moreno Beach Boulevard, approximately one mile west of the site.

Because the project site is located in close proximity existing RTA routes,¹ the proposed WLC project could be accessible to existing transit systems. As the project site is located adjacent to an area where commercial, residential, and industrial uses are planned or approved, and because the project site is readily accessible from SR-60 and from existing RTA bus routes, the proposed WLC project would be consistent with this SCAG Policy.

Goal *Inject new life into underused areas by creating vibrant new business districts, redeveloping old buildings, and building new businesses and housing on vacant lots.*

Consistent. The proposed WLC project site is currently used for agriculture. The proposed WLC project would introduce new high-cube logistics warehouse uses on vacant lots.

Outcome *Significantly increase the number and percentage of new housing units and jobs created within the Compass Blueprint 2% Strategy Opportunity Areas by 2012 and improve the regional jobs-housing balance. (Tracking the number of new units will measure the region's progress in accommodating forecast growth. The percentage of housing and jobs developed within the Opportunity Areas will indicate the locational efficiency of growth.)*

Consistent. The project is designed to address the City of Moreno Valley jobs/housing imbalance; the City has a scarcity of jobs compared to the number of residents.

Direct population increases are generally associated with residential developments and as there are no residential uses proposed for the project, there would be no direct increase in population. As most of the new employment opportunities are anticipated to be filled by existing local area residents, a large influx of new residents to the City would not occur. The City's current population per the 2010 Census is 195,216 and the SCAG projects the City's population will grow by 59,984 persons by the year 2035 (+31%). A City or sub-region with a jobs-to-housing ratio lower than the overall standard would be considered a "jobs poor" area, indicating that many of the residents must commute to places of employment outside the sub-area. The 2011 estimated jobs-to-housing ratios for the City,

¹ Riverside Transit Agency, <http://www.riversidetransit.com>, website accessed April 15, 2012.

County, and SCAG region are 0.45, 0.69, and 1.14, respectively. These ratios indicate that both Western Riverside County and the City of Moreno Valley are “jobs poor” because the jobs-to-housing ratios are below that of the Southern California region (as defined by SCAG).

It is anticipated that any new employment opportunities created by the proposed development would be filled by persons already residing in the local area. The proposed WLC project would serve the existing and continuing growth in the City and would not result in any direct increase to the population or households not previously anticipated in the City of Moreno Valley. In fact, it would result in a decrease in projected population in favor of an increase in anticipated job growth. As such, the proposed WLC project would be within the SCAG and Western Riverside Council of Governments (WRCOG) growth projection forecasts and would be consistent with this SCAG policy.

Outcome *Reduce total regional vehicle miles traveled (VMT) to 1990 levels by 2020. (The Land Use and Housing Action Plan can be expected to result in a 10% reduction in VMT in 2035 when compared to current trends. VMT serves as a proxy for jobs/housing balance, urban design, transit accessibility, and other urban form issues. VMT per household will decrease with Compass Blueprint implementation.)*

Consistent. As previously identified, the proposed WLC project would comply with all City development policies, standards, and programs pertaining to supporting alternative modes of transportation included in the General Plan Circulation Element. In addition, the proposed WLC project would result in the development of employment opportunities in fairly close proximity to existing residential development. The type of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity, limiting the need for vehicle travel. Because the project site is located adjacent to existing RTA Route 35¹ the proposed WLC project would be accessible to existing transit systems. Through consultation with the RTA, the project applicant will coordinate and facilitate the use of public transit to access the project site. The provision of additional employment options in proximity to existing residential development has the potential to reduce VMT; therefore, the proposed WLC project is consistent with this policy.

Section 4.15 of the EIR, *Traffic and Transportation*, indicates that Moreno Valley currently has a jobs/housing imbalance resulting in long westbound commutes for thousands of City residents every workday. The Specific Plan would eventually create approximately 25,000 new jobs, nearly doubling the number of jobs in Moreno Valley. This would have several effects on commute patterns over the long-term:

- Many existing and future residents of Moreno Valley would be able to work locally with very short commute trips.
- Residents of neighboring cities who work within the Specific Plan area would have short commutes and be able to access the site using the local arterial road network rather than the freeway. This is consistent with the policies of the WRCOG and the Riverside County Transportation Commission (RCTC) to promote use of the arterial road network as an alternative to freeways. The traffic study indicates that nearly half of auto traffic associated with the project would be on surface streets (i.e., not on freeways).
- Workers coming from more distant residences would, in most cases, be traveling on freeways in the off-peak direction; i.e. commuters traveling to the project from Los Angeles or Orange Counties would be headed eastbound in the morning and westbound in the evening. This would enable them to take advantage of the existing unused off-peak capacity of facilities that were sized for flows in the peak direction. The traffic study determined that, although the project would increase freeway auto traffic eastbound in the morning, it would decrease the traffic in the more congested westbound direction (Figure 40, TIA 2014). In the evening, this pattern would reverse,

¹ Riverside Transit Agency, <http://www.riversidetransit.com>, website accessed April 15, 2012.

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with the project relieving traffic in the congested eastbound direction (Figure 41, TIA 2014). Therefore, it appears the proposed project will have a net beneficial impact on the regional freeway auto traffic. This is consistent with the policies of the SCAG, WRCOG, and other regional bodies to encourage better jobs/housing balances as a way to reduce peak flow on the freeway system. It will also help the project and City comply with the requirements of SB 375 regarding long-term land use patterns to achieve a better regional balance of jobs/housing, which in turn will help reduce traffic congestion on regional freeways.

It should also be noted that this project will help reduce VMT within the City of Moreno Valley over the long term since it will add thousands of new jobs to the local workforce instead of new housing, thus improving the City's jobs to housing ratio.

Policy LU-6.2 *Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.*

Consistent. According to Section 1.3.2 of the WLC Specific Plan, the project will be in conformance with California's CALGreen building regulations. The Specific Plan states that 1) these are "the most stringent, environmentally friendly building codes in the U.S.;" and 2) "CALGreen is a comprehensive, far-reaching set of regulations which mandate environmentally advanced building practices and regulations designed to conserve natural resources and reduce greenhouse gas emissions, energy use, and water use."

In addition to compliance with the CALGreen building regulations, WLCSP Section 1.3.2, *Green Building – Sustainable Development*, indicates the project proposes to incorporate the following sustainable design features to further reduce its environmental footprint, including:

- Allow the installation of solar photovoltaic panels on each building (i.e., Mitigation Measure 4.16.4.6.1C requires that the project install solar panels to provide electricity for the office demands.) to help offset each building's annual electrical demand;
- The project would require LEED certification for buildings and would require buildings to exceed Title 24 by 10 percent;
- Channelizing street runoff into landscape areas instead of storm drains;
- Use of recycled and/or locally sourced building materials to the extent feasible;
- Reduction in the use of impervious surfaces throughout the project;
- The WLCSP provides for an alternative fueling station on the site;
- Provide for site access via existing transit systems (WLCSP Section 3.3.4, Mass Transit Circulation); and
- Provide for internal circulation via bicycles and walking (WLCSP Section 3.4, Non-Vehicular Circulation).

Therefore, the proposed WLC project is consistent with this SCAG policy.

Open Space and Habitat Chapter

Policy OSC-8 *Local governments should encourage patterns of urban development and land use, which reduce costs of infrastructure and make better use of existing facilities.*

Consistent. The proposed WLC project is adjacent to existing developed in areas that are presently served by various existing water, sewer, storm drainage, electrical, natural gas, and transportation

services. During the construction of the project and as needed throughout the process, necessary utility and roadway improvements will be installed or extended to the project site from adjacent existing facilities. The supply of electricity and natural gas is demand-responsive and the project proponent would be required to meet the service requirements of these utility providers. By maximizing the use of existing facilities, the costs of expanding infrastructure would be minimized. Because the proposed WLC project would be located in close proximity to existing industrial, commercial, and residential structures requiring a similar type of infrastructure, it is consistent with this growth management policy.

Policy OSC-12 *Developers and local governments should promote water-efficient land use and development.*

Consistent. As identified in Section 4.17 of this EIR, pursuant to Assembly Bill 325 (AB 325), the City of Moreno Valley implements landscape and irrigation design standards (Chapter 9.17 of the City's Municipal Code), which establishes water conservation requirements for new or rehabilitated landscapes.¹ The proposed WLC project is subject to this ordinance and will be required to implement water-efficient landscaping design (i.e., drought-tolerant landscaping) within the project site. In addition, a major design concept of the Specific Plan is water conservation through the careful selection and maintenance of drought-tolerant native plants. For example, Section 1.3.1 of the Specific Plan indicates a major goal of the project will be to minimize water consumption as outlined in Specific Plan Section 5.2.3 *Sustainable Design*, Section 5.4, *Onsite Landscaping*, and Section 6.0, *Sustainability*. All of these sections call for the project to minimize water use through installation of drought-tolerant landscaping and irrigating with runoff from building roofs and ground-level hardscape areas. Therefore, the proposed WLC project would be consistent with this SCAG policy.

Water Chapter

Policy WA-11 *Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.*

Consistent. Existing warehousing development is located in the immediate vicinity of the project site where infrastructure for water, sewer, storm drainage, electrical, natural gas, and transportation facilities currently exist. During the construction of the project and as needed throughout the process, necessary utility and roadway improvements will be installed or extended to the project site from adjacent existing facilities. The utility and roadway improvements will facilitate future growth in the surrounding area. The availability of this infrastructure would reduce the cost to public agencies that would provide services to the project area. The proposed WLC project would be developed in an area where such infrastructure is accessible. Furthermore, the project applicant would pay all applicable development fees for the necessary infrastructure and public service improvements, including those associated with water, sewer, drainage, roadways, fire, and police; therefore, the proposed WLC project is consistent with this policy.

Policy WA-12 *Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.*

Consistent. As identified in earlier in this section, pursuant to Assembly Bill 325 (AB 325), the City of Moreno Valley implements landscape and irrigation design standards (Chapter 9.17 of the City's Municipal Code), which establishes water conservation requirements for new or rehabilitated

¹ City of Moreno Valley Municipal Code.

landscapes.¹ The proposed WLC project is subject to this ordinance and will be required to implement water-efficient landscaping design (i.e., drought-tolerant landscaping) within the project site. Therefore, the proposed WLC project would be consistent with this SCAG policy.

Energy Chapter

Policy EN-10 *Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy-saving measures that should be explored for new and remodeled buildings include:*

- *Using energy-efficient materials in building design, construction, rehabilitation, and retrofit.*
- *Encouraging new development to exceed Title 24 energy efficiency requirements.*
- *Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment.*
- *Utilizing efficient commercial/residential space and water heaters. This could include the advertisement of existing and/or development of additional incentives for energy-efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits.*
- *Encouraging landscaping that requires no additional irrigation; utilizing native, drought-tolerant plants can reduce water usage up to 60 percent compared to traditional lawns.*
- *Encouraging combined heating and cooling (CHC), also known as cogeneration, in all buildings.*
- *Encouraging neighborhood energy systems, which allow communities to generate their own electricity.*
- *Orienting streets and buildings for best solar access.*
- *Encouraging buildings to obtain at least 20 percent of their electric load from renewable energy.*

Consistent. According to Section 5.2.3 of the WLC Specific Plan (Sustainable Design), the project will be in conformance with California's "CALGreen" building regulations which are considered the most stringent, environmentally friendly building codes in the U.S. In addition to compliance with the CALGreen building regulations, the project proposes to incorporate the following additional sustainable design features to further reduce its environmental footprint, including:

- The project would require LEED certification for buildings and would require buildings to exceed Title 24 by 10 percent;
- Allow the future installation of solar photovoltaic panels on each building (i.e., Mitigation Measure 4.16.4.6.1C requires that the project install solar panels to provide electricity with a minimum capacity equal to office electrical demand.) to help offset annual electrical energy consumption;
- Substantially reduced water use for landscape irrigation;
- Channelizing street runoff into landscape areas instead of storm drains;

¹ *City of Moreno Valley Municipal Code.*

- Use of recycled and/or locally sourced building;
- Reduction in the use of impervious surfaces throughout the project;
- The WLCSP provides for an alternative fueling station on the site;
- Provide for site access via existing transit systems (WLCSP Section 3.3.4, Mass Transit Circulation); and
- Provide for internal circulation via bicycles and walking (WLCSP Section 3.4, Non-Vehicular Circulation).

In addition, the strategies listed in Section 4.7, *Greenhouse Gases and Global Climate Change*, of this EIR are considered to be greenhouse gas emission reduction strategies, which include green building measures. These strategies are either part of the project, required mitigation measures, or requirements under local or State ordinances. Since the project would implement these strategies into project design and operation, the project would be consistent with this SCAG policy.

Solid Waste Chapter

Policy SW-14 *Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:*

- *Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.*
- *An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion.*
- *Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings).*
- *Reuse of existing building structure and shell in renovation projects.*

Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:

- *Development of indoor recycling program and space;*
- *Design for deconstruction; and*
- *Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable components.*

Consistent. As noted above, according to Section 5.2.3 of the WLC Specific Plan, *Sustainable Design*, the project will be in conformance with California's "CALGreen" building regulations. In addition to compliance with the CALGreen building regulations, the project proposes to incorporate the following additional sustainable design features to further reduce its environmental footprint, including:

- Substantially reduced water use for landscape irrigation;
- Channelizing street runoff into landscape areas instead of storm drains;

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- Use of recycled and/or locally sourced building materials to the extent feasible;
- Reduction in the use of impervious surfaces throughout the project;
- Provide for site access via existing transit systems; and
- Provide for internal circulation via bicycles and walking.

The strategies listed in Section 4.7 *Greenhouse Gases and Global Climate Change* of this EIR are considered to be greenhouse gas emission reduction strategies, which include green building measures. These strategies are either part of the project, required mitigation measures, or requirements under local or State ordinances. With implementation of these strategies/measures, the project would be consistent with this SCAG policy.

Transportation Chapter

Goal *A more efficient transportation system that reduces and better manages vehicle activity.*

Consistent. The proposed WLC project would result in the development of employment opportunities in close proximity to housing. In addition, the project proposes sidewalks, bicycle routes, and landscaping treatments to provide for pedestrian and bicycle access throughout the project site. The type of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity, limiting the need for vehicle travel. At present, Moreno Valley has a jobs/housing imbalance that results in long westbound commutes for thousands of city residents every workday. The WLC would create approximately 24,000¹ permanent new jobs within the City (20,307 direct jobs and 3,693 indirect jobs); nearly doubling the number of jobs in Moreno Valley. This would have several effects on commute patterns:

- Many existing and future residents of Moreno Valley would be able to work locally with very short commute trips.
- Residents of neighboring cities who work at the WLC would have short commutes and, importantly, be able to access the site using the arterial road network. This is consistent with the policies of the WRCOG and the RCTC to promote use of the arterial road network as an alternative to freeways. Tests with the Riverside County Traffic Analysis Model (RivTAM) model suggest that nearly half of auto traffic associated with the WLC would be on surface streets (i.e., not on freeways).
- Workers coming from more distant residences would, in most cases, be traveling on freeways in the off-peak direction; i.e. commuters traveling to the WLC from Los Angeles or Orange Counties would be headed eastbound in the morning and westbound in the evening. This would enable them to take advantage of the existing unused off-peak capacity of facilities that were sized for flows in the peak direction. Although the project would increase freeway auto traffic eastbound in the morning, it would decrease the traffic in the more congested westbound direction. In the evening, the pattern would reverse, with the project relieving traffic in the congested eastbound direction. Therefore the WLC project will have a net beneficial impact on the regional freeway auto traffic. This is consistent with the policies of SCAG, WRCOG, and other regional bodies to encourage better jobs/housing balances as a way to reduce peak flow on the freeway system.

Therefore, this project is consistent with this transportation goal.

¹ *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California, David Taussig & Associates, Inc., original dated January 2012, updated September, 2014.*

Security and Emergency Preparedness Chapter

Goal *Ensure transportation safety, security, and reliability for all people and goods in the region.*

Consistent. The proposed WLC project is consistent with this goal in that the proposed WLC project would be required to adhere to the City of Moreno Valley's General Plan. The General Plan contains goals and policies that aim to provide adequate and reliable transportation facilities. The goals and policies identified in the City's General Plan resemble those of the RCP that address mobility, traffic safety, environmental concerns, and land use consistency as the major traffic study factors to identify existing traffic conditions and to assess the future effects on area traffic patterns/flow.

Economy Chapter

Goal *Enable business to be profitable and competitive (locally, regionally, nationally, and internationally).*

Consistent. The proposed WLC project would add to the City's portfolio of industrial and logistics services. Through the addition of the proposed WLC project, the City would also expand its economic competitiveness with other areas in the region. Therefore, the proposed WLC project is consistent with this policy.

Goal *Promote sustained economic health through diversifying the region's economy, strengthening local self-reliance and expanding competitiveness.*

Consistent. As previously stated, the proposed WLC project would add to the City's portfolio of industrial and logistic services, which would enable the City to be more self-reliant through the provision of goods and services to residents within the City. Through the addition of the proposed WLC project, the City would also expand its economic competitiveness with other areas in the region. Therefore, the proposed WLC project is consistent with this policy.

Goal *Ensure a healthy, flourishing economy that provides sufficient employment opportunities to decrease poverty and meet the basic needs of all the people who participate in our economy by promoting education and workforce training policies that give residents an opportunity to compete for the full range of jobs available with good wages and benefits.*

Consistent. The proposed WLC project would provide additional employment opportunities in a community with a low jobs/housing ratio. In addition, the proposed WLC project would meet the basic needs of those who participate in the economy through the use of training in the workforce. Therefore, the proposed WLC project is consistent with this policy.

Outcome *Increase job growth to add three million jobs to the regional economy by 2035.*

Consistent. The proposed WLC project would result in additional jobs in the City and indirect jobs in the County and City, which would contribute to job growth in the regional economy. Therefore, the proposed WLC project is consistent with this policy.

Outcome *Increase the region's economic vitality and attractiveness by focusing housing and job additions in urban centers, employment centers, and transportation corridors, such that there will be a minimum of 35 percent of the region's household growth and 32 percent of employment growth in these areas from their levels in 2005 by 2035.*

Consistent. Development of the proposed on-site uses would increase the number of jobs in the City by approximately 24,000 at full development. The 2011 estimated jobs-to-housing ratios for the City,

sub-region, and region are 0.45, 0.69, and 1.14, respectively. The 2035 future jobs-to-housing ratios for the City, sub-region, and region are 0.88, 1.14, and 1.29, respectively. These ratios indicate that both western Riverside County and the City of Moreno Valley are “jobs poor” because the jobs-to-housing ratios are below the Southern California region (as defined by SCAG). A city or sub-region with a jobs-to-housing ratio lower than the overall standard would be considered a “jobs poor” area, indicating that many of the residents must commute to places of employment outside the sub-area. Since the proposed WLC project would add jobs to a “jobs poor” region, the proposed WLC project would increase the region’s economic vitality and attractiveness by job additions in urban centers and along transportation corridors. Therefore, the proposed WLC project is consistent with this SCAG policy.

2008 Regional Transportation Plan: The 2008 RTP adopted by the SCAG in May 2008 contains a set of existing socioeconomic projections used as the basis for the SCAG’s transportation planning efforts. They include projections of population, housing, and employment at the regional, county, sub-regional, jurisdictional, Census tract, and transportation analysis zone levels. The RTP includes policies and regulations set forth to ensure development within the SCAG regional area is within planned and forecast socioeconomic projections. Goals established within the RTP include the following:

- Maximize mobility and accessibility for all people and goods in the region (discussed in Section 4.15, *Traffic and Circulation*);
- Ensure travel safety and reliability for all people and goods in the region (discussed in Section 4.15, *Traffic and Circulation*);
- Preserve and ensure a sustainable regional transportation system (discussed in Section 4.15, *Traffic and Circulation*);
- Maximize the productivity of our transportation system (discussed in Section 4.15, *Traffic and Circulation*);
- Protect the environment, improve air quality, and promote energy efficiency (discussed in Section 4.3, *Air Quality*);
- Encourage land use and growth patterns that complement our transportation investments and improve the cost-effectiveness of expenditures (discussed in Section 4.15, *Traffic and Circulation*); and
- Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies (discussed in Section 4.15, *Traffic and Circulation*).

The proposed WLC project is consistent with the RTP in that it would be required to adhere to the City of Moreno Valley’s General Plan. The General Plan contains goals and policies that aim to minimize traffic congestion, provide adequate transportation facilities, and require development to pay its share of costs. The goals and policies identified in the City’s General Plan resemble those of the RTP that address mobility, traffic safety, environmental concerns, and land use consistency as the major traffic study factors to identify existing traffic conditions and to assess the future effects on area traffic patterns/flow.

Compass Growth Vision: The Compass Growth Vision plan provides a framework for local and regional decision-making regarding growth, transportation, land use, and economic development. The framework includes principles and a specific set of strategies intended to achieve and improve a quality of life that promotes and sustains for future generations the region’s mobility, livability, and prosperity. The main objective of the Compass Growth Vision is to manage the forecast growth while improving future living conditions for all people within the SCAG area, including live, work, and play activities.

The following discussion includes the principles within the Compass Growth Vision plan and their association to the proposed WLC project.

- **Principle 1:** Improve mobility for all residents.
- **Principle 2:** Foster livability in all communities.
- **Principle 3:** Enable prosperity for all people.
- **Principle 4:** Promote sustainability for future generations.

The proposed WLC project is consistent with the four principles identified above. The nature of the proposed WLC project allows the transport of commodities from a single area rather than multiple areas, minimizing vehicle trip generation. The proposed WLC project supports the prosperity for all people by providing employment opportunities close to existing housing within the City of Moreno Valley. The proposed WLC project is located in an area that is already developing with urban uses and where existing infrastructure (freeway, sewer, electrical, water, etc.) is accessible. During the construction of the project and as needed throughout the process, necessary utility and roadway improvements will be installed or extended to the project site from adjacent existing facilities. The utility and roadway improvements will facilitate future growth in the surrounding area. The development of the proposed WLC project is consistent with the land use vision for the site and will augment existing services available in the City and region.

SCAG 2012 Regional Transportation Plan and Sustainable Communities Plan. As part of the adoption of the 2012 RTP, SCAG developed an SCS, which was required as part of SB 375. According to SB 375, each metropolitan planning organization shall prepare a sustainable communities strategy, including the requirement utilizing the most recent planning assumptions considering local general plans and other factors. The Sustainable Communities Strategy shall:

1. Identify the general location of uses, residential densities, and building intensities within the region;
2. Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth;
3. Identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region;
4. Identify a transportation network to service the transportation needs of the region;
5. Gather and consider the best practically available scientific information regarding resource areas and farmland in the region;
6. Consider the State housing goals specified in Sections 65580 and 65581;
7. Set forth a forecast development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the State Board; and
8. Allow the regional transportation plan to comply with the Federal Clean Air Act.

The SCS and the 2012 RTP contain new regional growth projections for each city in the Southern California region. Table 4.10.C contains the population and employment forecasts for the City of Moreno Valley.

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Table 4.10.C: SCAG Population and Employment Projections, 2008–2035

Population			Employment			Increase 2008–2035	
2008 per Census	2020 Projection	2035 Projection	2008 per Census	2020 Projection	2035 Projection	Population	Employment
187,400	213,700	255,200	32,300	48,000	64,400	36%	99%

Source: SCAG 2012 RTP

The 2012–2035 RTP/SCS contains a number of “Outcome and Performance Measures/Indicators”¹ that are used to evaluate various regional land use plan alternatives, with the objective being an improvement over the No Project (i.e., no SCS) baseline. These measures are applied on a regional basis, and are not necessarily applicable to individual projects like the World Logistics Center. However, the following general discussion of consistency with the relevant measures shown in Table 4.10.D can be provided.

Table 4.10.D: Discussion of RTP Outcomes and Performance Measures/Indicators

Performance Measure/Indicator	Definition	Consistency of Proposed WLC project
Share of growth in High Quality Transit Areas (HQTAs)	Increase share of the region's growth in households and employment in HQTAs	Consistent. The project is not currently located in an SCAG-defined HQTAs. However, the project is located adjacent to existing transit routes and makes provisions for future bus service through the relocation of existing routes. By developing a focused employment center, the project can attract more frequent transit service to the area. Given the potential for readily providing transit service to the site, the project is generally consistent with this goal.
Land consumption	Reduce additional land needed for development that has not previously been developed or otherwise affected, including agricultural land, forest land, desert land, and other virgin sites.	Consistent. The SCAG plan calls for reducing the amount of virgin land converted to development, as compared to the “No Project” condition. The project would develop land long planned for suburban level development, but would replace the approved mixed-use residential project with a logistics warehousing project that would add employment instead of housing to the City which has long been considered by SCAG to be “housing rich.” The EIR does note that the WLC project would convert agricultural land to other uses.
Average distance for work or non-work trips	Decrease the average distance traveled for work or non-work trips separately.	Consistent. The City of Moreno Valley is “jobs-poor,” which forces many Moreno Valley residents to commute long distances from their homes to work. By providing employment opportunities closer to existing population centers, the project should reduce the length of work related trips.*
Percentage of work trips less than 3 miles.	Increase the share of total work trips that are fewer than 3 miles.	Consistent. As noted above, the City of Moreno Valley needs additional jobs for its residents. The project will increase the ability of Moreno Valley residents to find work closer to home and thereby reduce travel times. Approximately 50% of the City of Moreno Valley is within three miles of the project site. To the extent that Moreno Valley residents are employed at the project site, the

¹ http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_PerformanceMeasures.pdf, Table 2.

Table 4.10.D: Discussion of RTP Outcomes and Performance Measures/Indicators

Performance Measure/Indicator	Definition	Consistency of Proposed WLC project
		share of work-related trips less than three miles should increase.
Work trip length distribution.	Reduce the statistical distribution of work trip length in the region.	Consistent. In addition to the discussion above, the project traffic study indicates that nearly half of auto traffic associated with the project would be on surface streets (i.e., not on freeways). The traffic study determined that, although the project would increase freeway auto traffic eastbound in the morning, it would decrease the traffic in the more congested westbound direction. In the evening, this pattern would reverse, with the project relieving traffic in the congested eastbound direction. Therefore, it appears the proposed project will have a net beneficial impact on the regional freeway auto traffic.
Criteria pollutants and greenhouse gas emissions.	Reduce CO, NO _x , PM _{2.5} , PM ₁₀ , VOC, and per capita greenhouse gas emissions (CO ₂).	Consistent. To the extent that total work-related trip lengths are reduced, the project would reduce such emissions.
Annual household transportation cost.	Reduce annual household spending on transportation costs of vehicle ownership, operation, and maintenance, and public transportation.	Consistent. To the extent that total work-related trip lengths are reduced, the project would reduce such costs.
Percentage of jobs within 15 minutes' walk of transit.	Increase the number of jobs within 15 minutes' walk of public transportation.	Consistent. Assuming the bus service revisions as described above, all of the WLCSP site would be within 15 minutes' walk of public transportation.

* Market conditions at the time that employers move into the site will determine the actual match of jobs within the project to the then current employment needs of Moreno Valley residents.
Source: http://rtpscscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_PerformanceMeasures.pdf

As Table 4.10.D shows, the project is generally consistent with the SCAG RTP/SCS Performance measures. It should be noted that the WLCSP project will significantly improve the jobs/housing ratio for the City, which will assist SCAG in achieving its regional RTP growth goals, as well as a number of RTP performance standards regarding sub-regional jobs/housing ratios (i.e., regional goal is to add housing in jobs rich areas and add jobs in housing rich areas like Moreno Valley). Additional information and analysis in this regard is provided in Section 4.13, *Population, Housing, and Employment*.

Santa Ana Water Quality Control Plan (Basin Plan). The Santa Ana Basin Plan, which is implemented by the Santa Ana RWQCB, specifically (1) designates beneficial uses for surface and ground waters, (2) sets qualitative and quantitative objectives that must be attained and maintained at that level in order to protect the designated beneficial uses and conform to the State's anti-degradation policy, and (3) describes implementation policies and programs to protect all waters in the region. In cases where the Basin Plan does not contain a standard for a particular pollutant, other criteria are used to establish a standard. Storm water runoff from approximately the western half of the project drains toward the west, into the Perris Valley Storm Drain, then flows into the San Jacinto River and eventually into Canyon Lake and Lake Elsinore. The eastern half of the project drains south into Mystic Lake when flows are high, and runoff eventually makes its way to the San Jacinto River. Because the proposed WLC project is required to comply with all applicable water quality standards and requirements established by the RWQCB, and is therefore in compliance with the NPDES permitting system, the proposed WLC project would be consistent with the Basin Plan.

Riverside County Drainage Area Management Plan (DAMP). Like the Basin Plan, the Drainage Area Management Plan deals primarily with the Santa Ana Region. The DAMP describes a wide range of continuing and enhanced Best Management Practices (BMPs) and control techniques for development projects within a municipality and are being implemented during the five-year terms of the third-term MS4 permits. In essence, the DAMP describes the overall urban runoff management strategies planned by the permittees in the Santa Ana Region. The proposed WLC project is required to comply with all applicable drainage standards and requirements designed to protect water resources and enhance water quality and would therefore, be consistent with the DAMP.

Eastern Municipal Water District Urban Water Management Plan (EMWD UWMP). A UWMP is required of every urban water supplier in order to be in compliance with the Urban Water Management Plan Act. The UWMP includes assessment of current and projected water supplies, evaluation of water demand, customer types, and reliability of water supplies, description of conservation measures, a response plan for water shortage, and a comparison of demand and supply projections. The proposed WLC project is required to comply with all applicable standards and requirements designed to conserve water supplies and ensure water source reliability for future years prior to the approval of the project. As such, the proposed WLC project would be consistent with the EMWD UWMP. A comprehensive Water Supply Assessment (WSA) was prepared for this project by the EMWD that determined there were sufficient water supplies, including during multiple drought years, to supply the WLCSP project.

Summary of Impact 4.10.5.2: Conflict with Applicable Regional Land Use Plans, Policies, or Regulations. The preceding analysis demonstrates that the proposed project is generally consistent with the goals of SCAG’s Regional Comprehensive Plan, Compass Plan and Regional Transportation Plan in that it seeks to add employment in an area that has historically been “jobs poor,” which will help reduce worker commute trips from Moreno Valley over the long term. The WLCSP project is generally consistent with these plans because the WLCSP will generate fewer emissions than the currently approved Moreno Highland Specific Plan, and it will provide for a better balance of jobs versus housing in Moreno Valley, which will incrementally improve regional commuting directions and distances by providing almost 24,000 new jobs in an area currently planned for housing.

4.10.5.3 Conflict with Applicable Land Use Plans, Policies, or Regulations (Local)

Threshold	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, Specific Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
-----------	---

Section 15125 (d) of the *CEQA Guidelines* requires EIRs to “discuss any inconsistencies between the proposed project and applicable general plans and regional plans.” The objective of such a discussion is to find ways to modify a project, if warranted, to eliminate any identified inconsistencies with relevant plans and policies, and thereby avoid creating an impact to the environmental that consistency with the plan would otherwise mitigate. Pursuant to *CEQA Guidelines* Section 15125 (d), this EIR section includes an evaluation of the consistency of the proposed project with pertinent goals and policies of the adopted City of Moreno Valley General Plan (see Figure 4.10.2).

The project proposes to amend the existing City of Moreno Valley General Plan Land Use Plan for the project area. By definition, the project is inconsistent with the existing General Plan and approval of the project would correct the inconsistency by amending the General Plan Land Use and other Elements to be consistent with the WLC project and Specific Plan. Figures 4.10.2 and 4.10.3 show the existing General Plan land uses and the proposed land uses. Table 4.10.E compares the land uses allowed under the current General Plan with those allowed under the proposed amended General Plan.

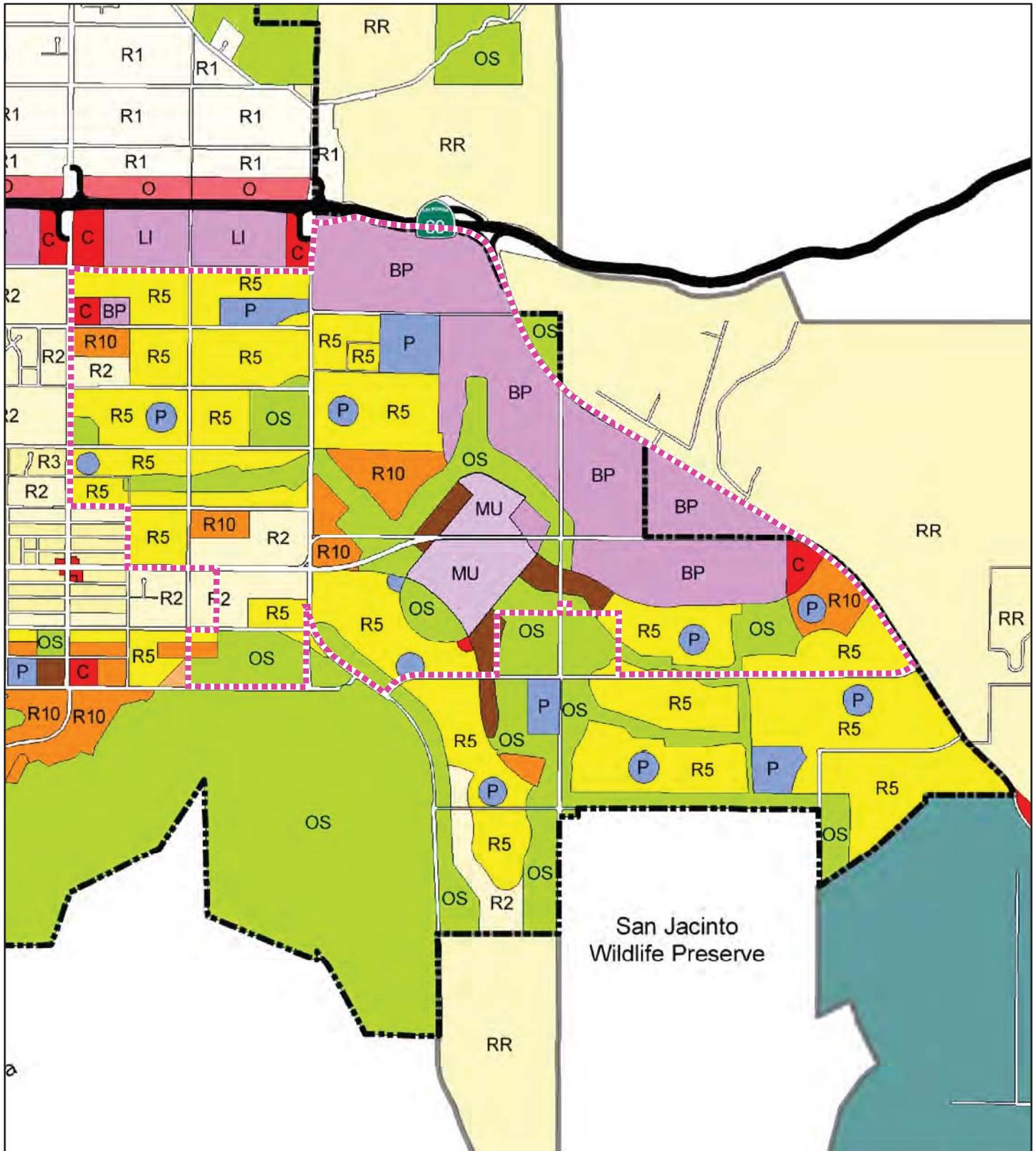
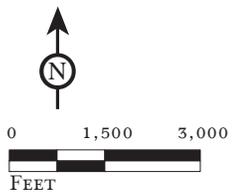


FIGURE 4.10.2

LSA



- Project Boundary
- Highways
- City Boundary
- Sphere of Influence

Land Use

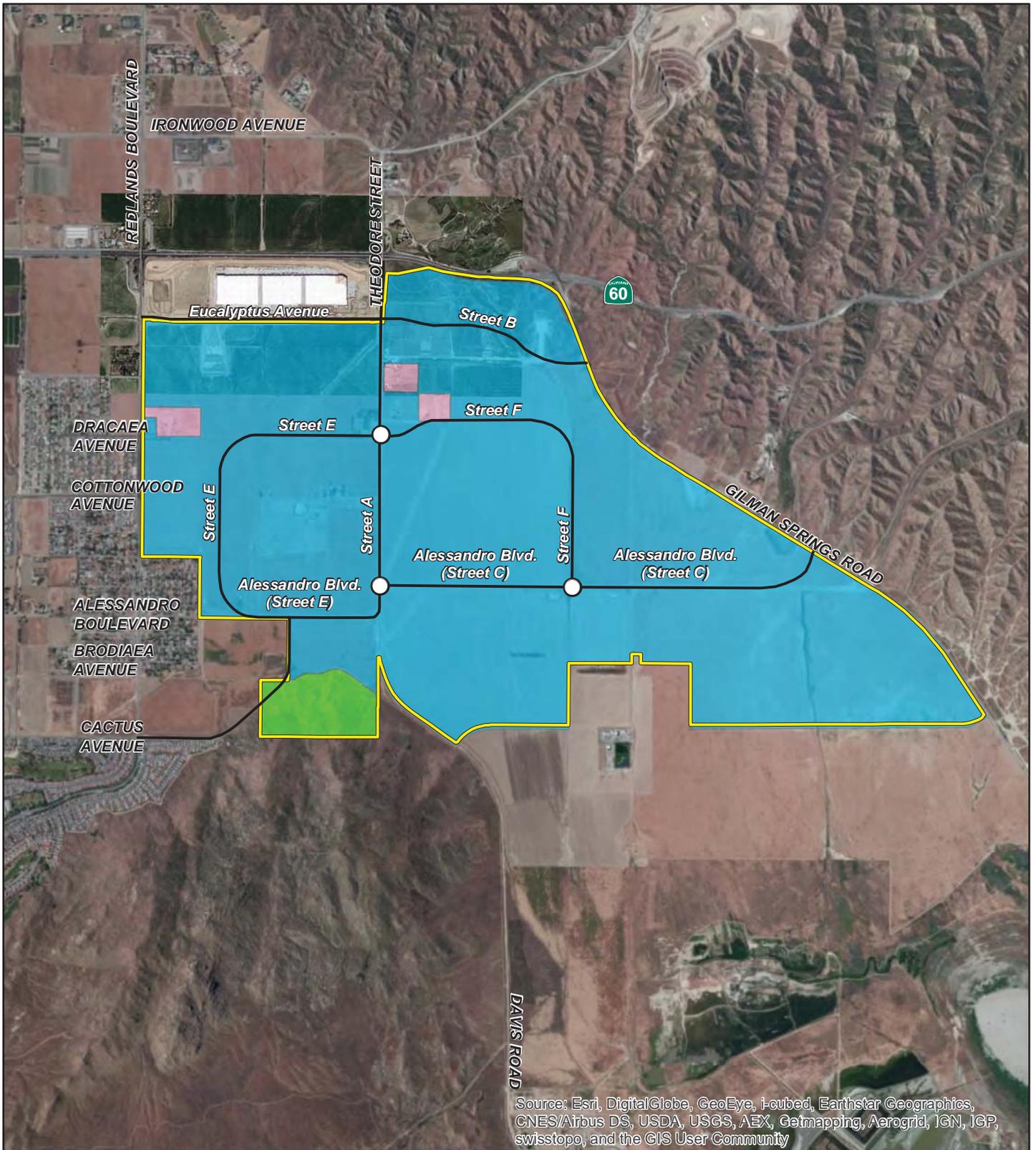
- Residential: Max. 1 du/ac
- Mixed Use
- Residential: Max. 2 du/ac
- Residential: Max. 3 du/ac
- Residential: Max. 5 du/ac
- Residential: Max. 10 du/ac
- Residential: Max. 20 du/ac
- Office

- Commercial
- Business Park/Light Industrial
- Open Space
- Public Facilities
- Floodplain

*World Logistics Center Specific Plan Project
Environmental Impact Report
General Plan Land Uses*

SOURCE: Riverside County and City of Moreno Valley, August, 2010.

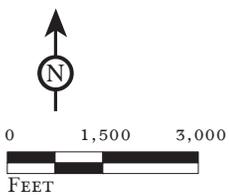
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Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

FIGURE 4.10.3

LSA



- Project Boundary
- Light Logistics
- Logistics Development
- Open Space

World Logistics Center Specific Plan Project
 Environmental Impact Report
 Specific Plan Land Uses

SOURCE: ESRI World Imagery, 2010; Bing Maps, 2010; Google Maps, 2011.

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Table 4.10.E: City of Moreno Valley General Plan Consistency Analysis

Goals, Policies and Objectives	Project Consistency Analysis
<p>Ultimate Goal IV: Enjoys a healthy economic climate that benefits both residents and businesses.</p>	<p>Consistent: The City has determined that its low jobs/housing ratio limits the job opportunities for local residents, and creates economic challenges for the City. By increasing employment opportunities and potentially increasing the jobs/housing ratio, the project will enhance the economic climate for both businesses and residents.</p>
<p>Ultimate Goal VI: Enjoys a circulation system that fosters traffic safety and the efficient movement of motor vehicles, bicycles, and pedestrians.</p>	<p>Consistent: The WLCSP circulation will be designed to modern safety standards, and provide for efficient movement and motor vehicles, both on the local streets and freeway. To the extent that the project increases job opportunities for local residents, it should decrease the length of employment trips, increasing the efficiency of the local transportation system. However, it will result in substantial additional traffic, including trucks, on SR-60 and Gilman Springs Road. The project will make various roadway and intersection improvements, and make fair share contributions to local Development Impact Fee (DIF) and regional Transportation Uniform Mitigation Fee (TUMF) traffic mitigation programs.</p>
<p>Community Development Goal 2.1: Develop 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.</p>	<p>Consistent: The project proposes a major industrial/logistics center on agricultural land in the eastern end of the City. With proposed mitigation, these land uses will have adequate setbacks or be buffered from adjacent residential land uses. The property was planned for a mixed use residential master planned community (i.e. Moreno Highlands Specific Plan) and so the proposed WLCSP project will require a General Plan Amendment. In addition, although this is a fundamental change from previous planned land uses, it will provide a substantial amount of new employment consistent with the City's Economic Development Strategy and the 2011 Housing Element. Therefore, the WLC project is considered to be consistent with the General Plan in this regard.</p>
<p>Objective 2.1: Balance the provision of urban and rural lands within Moreno Valley by providing adequate land for present and future urban and economic development needs, while retaining the significant natural features and the rural character and lifestyle of the northeastern portion of the community.</p>	<p>Consistent: The proposed WLCSP will provide logistics-related employment to help balance out the historical abundance of housing developed in the City. It would not affect the northeastern portion of the City (i.e., north of SR-60).</p>
<p>Community Development Objective 2.5: Promote a mix of industrial uses that provides a sound and diversified economic base and ample employment opportunities for the citizens of Moreno Valley with the establishment of industrial activities that have good access to the regional transportation system, accommodate the personal needs of workers and business visitors; and which meets the service needs of local businesses.</p>	<p><i>NOTE: The following changes have been made due to revision to the Specific Plan project size.</i></p> <p>Consistent: The project will provide 40.6 million square feet of logistics-related warehousing and supporting office space. This development will enhance the economic base and provide increased employment opportunities for the citizens of Moreno Valley in a limited number of worker categories. The project site has direct access to two interchanges on SR-60, along with arterial access to the balance of Moreno Valley, and access to the San Jacinto/Hemet Valley via Gilman Springs Road. It is therefore consistent with the General Plan.</p>

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Table 4.10.E: City of Moreno Valley General Plan Consistency Analysis

Goals, Policies and Objectives	Project Consistency Analysis
<p>Community Development Policy 2.5.1: The primary purpose of areas designated Business Park/Industrial is to provide for manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities. The zoning regulations shall identify the particular uses permitted on each parcel of land. Development intensity should not exceed a Floor Area Ratio of 1.00 and the average floor area ratio should be significantly less.</p>	<p>Consistent: The project is consistent with policies applicable to the Business Park/Industrial designation. The project will primarily provide opportunities for warehousing/logistics distribution, along with additional opportunities for manufacturing and research and development, along with associated office space. The Specific Plan will become the zoning regulations for the site, and designates the land uses allowed on each parcel. The net Floor Area Ratio is estimated to be 0.5, which is considered significantly less than the General Plan maximum of 1.0.</p>
<p>Community Development Policy 2.5.2: Locate manufacturing and industrial uses to avoid adverse impacts on surrounding land uses.</p>	<p>Consistent: The project proposes to locate logistics warehouses in the far eastern portion of the City, and residential uses are adjacent to the southwest portion of the project site. The Specific Plan addresses these adjacency impacts with setbacks and landscaping, berms, walls, etc. so the project will be compatible with surrounding uses.</p>
<p>Community Development Policy 2.5.3: Screen manufacturing and industrial uses where necessary to reduce glare, noise, dust, vibrations and unsightly views.</p>	<p>Consistent: The Specific Plan will provide visual and physical screening where planned uses are adjacent to existing residential uses.</p>
<p>Community Development Policy 2.5.4: Design industrial developments to discourage access through residential areas.</p>	<p>Consistent: The proposed circulations network provides primary project access directly from SR-60, and does not rely on residential streets. Trucks will generally access the site off SR-60 by using the Theodore Street Interchange. Truck access along the Cactus Avenue Extension to Cactus Avenue and along Redlands Boulevard south of Eucalyptus Avenue will be prohibited.</p>
<p>Community Development 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.</p>	<p>Consistent: The Specific Plan includes contemporary design standards, which will provide a pleasant working environment.</p>
<p>Community Development Policy 2.10.1: Encourage a design theme for each new development that is compatible with surrounding existing and planned developments.</p>	<p>Consistent: Section 5.0 of the Specific Plan provides the architectural theme for the development.</p>
<p>Community Development Policy 2.10.12: Screen parking areas from streets to the extent consistent with surveillance needs (e.g., mounding, landscaping, low profile walls, and/or grade separations).</p>	<p>Consistent: Section 6.0 of the Specific Plan provides for mounding and screening of parking lots.</p>

While the project would amend the General Plan Land Use Map, the project also needs to be assessed against the Goals, Policies, and Objectives of the adopted General Plan, as contained in Section 9 of the General Plan. The potentially relevant policies have been extracted in Table 4.10.E, and the project's consistency with said policies is assessed.

With the implementation of the General Plan amendment that is part of the project approvals being sought, the project will be consistent with the City's General Plan.

In summary, the project is consistent with the goals, objectives, and policies of the City of Moreno Valley General Plan, except Objective 2.1 and Community Development Policy 2.5.2. As proposed, the Specific Plan represents a fundamental land use change for the Rancho Belago area, the eastern portion of Moreno Valley. The land is currently planned for a mixed-use residential community, but the WLC project will introduce 40.6 million square feet of logistics warehousing onto existing agricultural land that is adjacent to existing residential uses to the west and the San Jacinto Wildlife Area to the south.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

Moreno Valley. The land is currently planned for a mixed-use residential community, but the WLC project will introduce 40.6 million square feet of logistics warehousing onto existing agricultural land that is adjacent to existing residential uses to the west and the San Jacinto Wildlife Area to the south.

Housing Element. During the NOP period, several group representatives expressed concern that the WLCSP would eliminate 7,700 housing units in the Moreno Highlands Specific Plan that would have to be replaced elsewhere in the City. The City adopted an updated Housing Element in February 2011 identifying the Moreno Highlands area as a potential location for future jobs-producing land uses rather than housing (affordable or otherwise). The 2011 Housing Element update indicated the Moreno Highlands area would likely be rezoned to support employment-generating uses rather than housing. It also stated that “pursuing any land use changes with the Moreno Highlands Specific Plan area will not hinder the City’s ability to meet its RHNA obligations.” The term RHNA refers to the Regional Housing Needs Allocation (affordable housing allocations) from the SCAG. The State Department of Housing and Community Development (HCD) certified the City’s Housing Element on May 31, 2011.

In April 2011, the City adopted its Economic Development Action Plan, which also identified the eastern part of the City as a potential area for major job-producing land uses. The *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California* (“Study”) prepared by David Taussig & Associates, Inc., in 2014 concluded that the proposed WLC project would generate 24,000 jobs/employees to the area, which includes the creation of direct, indirect, and induced jobs/employees to the City.

The City’s 2006 Housing Element identified the Moreno Highlands Specific Plan as a potential source of vacant land that could accommodate possible future residential growth in the City. However, in 2011 the City updated its Housing Element and (i) anticipated possible land use changes from mixed use and residential to jobs producing warehouses in the eastern part of the City, and (ii) concluded that redesignating the entire land east of Redlands to the eastern City border for warehouse uses would not impede the City’s Housing Element Objectives. As stated in the City’s Housing Element:

The City will likely consider undertaking future planning efforts to achieve an improved jobs-housing balance. These future planning efforts could include the consideration of future proposals to re-designate areas south of SR 60 and east of Redlands Boulevard to the City’s eastern border to jobs-producing commercial and/or industrial-type uses.

The Moreno Highlands Specific Plan is an older, mixed use residential and industrial land use plan originally conceived and approved nearly twenty years ago and therefore may not be representative of the current economic environment and may not be viable. The plan does not specify unit types, thus allowing the City and the developer to tailor the unit mix to the community’s needs at the time the project is actually developed.

Moreno Highlands does make provisions for the phasing of the residential units. The plan does not specifically address the phasing of the affordable units, but merely notes the total number of units that will be developed in each of the three phases.

As noted above, the current economic recession has severely and negatively affected the residents of the City. Unemployment in the City is extraordinarily high, and many City residents have expressed a desire that the City consider job-producing land uses that create an improved jobs-housing balance.

As shown in Table 8-19.5, even with the elimination of all residential uses from the land area approximately south of SR 60 and east of Redlands Boulevard and extending to the City's eastern and southern boundaries, the City is still fully capable of and is expected to achieve its RHNA obligations for the 2008-2014 planning period.

Table 8-19.5

<p><i>AFTER removing sites south of SR 60 and east of Redlands, the Amended Inventory accommodates:</i></p> <p><i>4,100 Low and Very Low Income units which is 1.3 times the RHNA number (3,045) (deleting sites south of SR 60 and east of Redlands has no effect on low and very low income housing opportunities)</i></p> <p><i>2,600 Moderate Income units which is 2.1 times the RHNA number (1,239)</i></p> <p><i>7,828 Above Moderate Income units which is 2.5 times the RHNA number (3,068)</i></p> <p><i>14,528 total identified units which is 1.94 times the total RHNA number (7,474)</i></p>
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The HCD certified the City's Housing Element as compliant with State law on May 31, 2011. This means that approval of the proposed project will not impede the City's housing goals as set forth in its Housing Element, and no mitigation is required.

4.10.6 Significant Impacts

4.10.6.1 Physically Divide an Established Community

Impact 4.10.6.1: *The proposed project may adversely affect existing rural residences on the project site.*

Threshold	Would the proposed WLC project physically divide an established community?
-----------	--

The adjacent properties surrounding the proposed WLC project are residential, light industrial, open space and undeveloped. Essentially, the project site is located along the eastern urban boundary of the City of Moreno Valley with development only adjacent to the western boundary and northwest corner of the site. As it is located at the edge of the community, its development could not physically divide the community and no impact would occur relative to residences near the southwest corner of the site.

At present, there are seven rural residences on the project site. These properties vary in size from 0.5 to 5 acres and are located on the east side of Redlands Boulevard and Theodore Street. The WLC Specific Plan designates these properties as "Light Logistics" and allows various logistics-related uses but not actual development of logistics warehousing since none of the properties are large enough to support a warehouse building of 500,000 square feet or more. It is believed these properties are currently occupied. It is possible that, as development of the project site occurs according to the WLCSP, large warehouse buildings may eventually be located in close proximity to existing residences. It would be ineffective and inefficient to try to incorporate these residences into the WLCSP land plan of large logistics warehouses to accommodate these residences. In addition,

logistics operations would cause air pollutant, noise, lighting, and health risk impacts on residents living in these units if they were adjacent to operating warehouses. This is a significant land use impact.

Specific Plan Design Features. The WLCSP currently shows a 250-foot buffer or setback along the western boundary of the site to separate existing residences from the proposed warehouse buildings. However, it would be similarly ineffective and inefficient to try incorporate residences with similar buffers or setbacks into the WLCSP land plan.

Mitigation Measures. Installation of solid block walls around the warehouse building or the existing residence would help reduce noise and lighting impacts, but they would not help reduce air pollutant or health risk impacts. Therefore, there is no effective mitigation available to protect or separate these existing residences from future warehousing buildings and operations.

Level of Impact After Mitigation. Since there is no effective means of mitigating these onsite residences from the planned logistics warehouses, this land use impact is significant and unavoidable.

4.10.7 Cumulative Impacts

As discussed in this section, the WLC project would not have significant project-related impacts related to conflicts with applicable land use plans, policies, or regulations with approval of the proposed GPA, or conflict with an approved habitat conservation plan. While the project would represent a shift in land use policy for the eastern portion of the City, this policy shift does not represent a significant cumulative land use impact under CEQA. Section 4.10.6 determined the proposed project would have significant land use impacts on existing rural residences (“dividing an established community”), but this conflict does not rise to the level of a cumulative impact since the potential land use impacts to all adjacent residences will be less than significant, as discussed in Section 4.10.5.

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NOTE TO READERS. *No major revisions have been made to this section in response to comments.*

4.11 MINERAL RESOURCES

This chapter evaluates potential impacts related to known mineral resources that may result from the proposed project.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

This chapter is based in part on the following document, which is incorporated by reference:

- *City of Moreno Valley General Plan*, City of Moreno Valley, adopted July 2006.

4.11.1 Existing Setting

There are no lands within the City of Moreno Valley designated by the California Department of Conservation as known significant resource areas, defined by the State as Mineral Resources Zone 2 areas. As identified in the City's General Plan, lands within the City of Moreno Valley and its Sphere of Influence are designated MRZ-3 and MRZ-4, which are not defined as significant mineral resource areas.

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4.11.1.1 NOP/Scoping Comments

No comments were received from public agencies or the public regarding mineral resources.

4.11.2 Policies and Regulations

4.11.2.1 State Regulations

Surface Mining and Reclamation Act. The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the known or inferred mineral potential of the area. Construction aggregate resources (sand and gravel) deposits were the first commodity selected for classification by the State Mining and Geology Board. Once mapped, the State Mining and Geology Board is required to designate for future use those areas that contain aggregate deposits that are of prime importance in meeting the region's future need for construction-quality aggregates. There are three key objectives of SMARA regulations:

- Adverse environmental effects are prevented or minimized, and mined lands are reclaimed to a usable condition that is readily adaptable for alternative uses;
- The production and conservation of minerals are encouraged, while consideration is given to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment; and
- Residual hazards to the public health and safety are eliminated.

The primary objective of the SMARA is for each jurisdiction to develop policies that will conserve important mineral resources, where feasible, that might otherwise be unavailable when needed. The SMARA requires that once policies are adopted, local agency land use decisions must be in accordance with its mineral resource management policies. These decisions must also balance the mineral value of the resource to the market region as a whole, not just their importance to the local jurisdiction. Under SMARA, areas are categorized into four MRZs as follows:

MRZ-1 Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their production.

MRZ-2 Areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.

MRZ-3 Areas containing mineral deposits, the significance of which cannot be evaluated from available data.

MRZ-4 Areas where available information is inadequate for assignment to any other MRZ zone.

4.11.2.2 City of Moreno Valley General Plan Policies

No policies related to mineral resources are identified within the City's General Plan.

4.11.3 Methodology

The California Geological Survey (CGS) provides objective geologic information about California's diverse non-fuel mineral resources. Maps, reports, and other data products developed by CGS were used to locate mineral extraction areas in the project area. In addition, the City of Moreno Valley's General Plan was used to determine the location of possible mineral extraction areas in the project area.

4.11.4 Thresholds of Significance

Appendix G of the *State CEQA Guidelines* recognizes the following thresholds related to mineral resources. Based on these significance thresholds, potential impacts to mineral resources could be considered significant if the proposed project:

- Resulted in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State;
- Resulted in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plans.

4.11.5 Less than Significant Impacts

The following potential impacts were determined to be less than significant. In both of the following issues, either no impact would occur or adherence to established regulations, standards, and policies would reduce potential impacts to a less than significant level. In both instances, no mitigation is required.

4.11.5.1 Loss of Statewide, Regional, or Locally Important Mineral Resources

Thresholds	Would the proposed project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? Would the proposed project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plans?
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Lands within the City of Moreno Valley and its Sphere of Influence are designated MRZ-3 and MRZ-4, which are not defined as significant mineral resource areas. No sites have been designated as locally-important mineral resource recovery sites on any local plan.¹ In addition, Figure OS-5 of the Riverside County General Plan shows that the proposed project area is also located within MRZ-3. The development of the project site would not result in the loss of identified regional or local mineral resources, conversion of an identified mineral resource use, or conflict with existing mineral resource extraction activities. Therefore, the development of the project site would not result in a loss of statewide, regional, or locally important mineral resources. No impacts associated with this issue would occur and no mitigation is required.

4.11.6 Significant Impacts

Based on the analysis in Section 4.11.5, the project will have no significant impacts related to mineral resources, and no mitigation is required.

4.11.7 Cumulative Impacts

CEQA requires that an EIR discuss the project's incremental effects to determine if they are cumulatively considerable. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the

¹ Section 6.10 Mineral Resources, Section 6.0 Issues Found Not To Be Significant, Draft Environmental Impact Report for City of Moreno Valley General Plan 2030, State Clearinghouse #2004031135, City of Moreno Valley, October 2004.

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discussion of environmental impacts attributable to the project alone. The discussion must demonstrate practicality and reasonableness.

The cumulative area for mineral resources is the City of Moreno Valley and this part of western Riverside County. As population levels increase in the region, greater demand for aggregate and other mineral materials will be placed on mineral resources, especially sand and gravel. Similarly, development pressures in areas where these materials are known or expected to occur would result in the loss of availability of these mineral resources. However, because the project site is not identified as a significant source of sand/gravel deposits and development subsequent to the adoption of the proposed land use actions on any of the sites would not decrease the local or regional availability of mineral resources, potential future development of any of the sites would have no significant cumulative mineral resources impact.

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NOTE TO READERS. *This section has been revised due to the following changes from the project characteristics analyzed in the original DEIR:*

- *Loss of 100 acres from the Specific Plan (in the southwest corner);*
- *Changes to the Traffic Impact Assessment (TIA, see Section 4.15); and*
- *Change in project construction phasing (from 10 to 15 years).*

These changes also resulted in updates to the traffic impact assessment and proposed mitigation measures. In addition, this section has been revised in response to public comments received on the Programmatic DEIR.

The original DEIR determined that 14 road or freeway segments would result in a significant noise increase attributable to the project, resulting in a significant cumulative impact requiring mitigation. These 14 segments were included in the original noise study, and all other impacts identified in the original noise study are unchanged except as noted below.

Revisions have been made to this section to address changes in the Specific Plan, revisions to the project noise study (assessment tables), and in responses to comments mainly regarding mitigation.¹ Three street names have changed (Street C, D, and E) and may still be referenced in the section. For correct street names see Circulation Master Plan Figure 3.10. Due to a reduction in size of the Specific Plan, some impacts in this section have been reduced to less than significant levels.

4.12 NOISE

Changes from January 24, 2013, Noise Analysis

The Noise Assessment report included in the Programmatic Draft EIR was issued in January 2013. Comments have been received from various public and private groups and individuals. The Noise Assessment report has been modified in response to these comments and to clarify the description of the analysis. In addition, the Traffic Impact Analysis contained in the Draft EIR has been revised to reflect a downsizing of the project and other factors, resulting in a reduction in associated traffic volumes for the “with project scenarios.” The updated traffic volumes were used in the revised Noise Assessment report. The noise analysis procedures and significance thresholds have not been changed from the January 2013 noise assessment.

In the Noise Assessment report included in the Draft EIR, 33 roadway segments were identified where a significant noise impact would occur for at least one of the impact scenarios. In the revised Noise Assessment report for the Final EIR, 21 roadway segments have been identified as having a significant noise impact. The reduction in noise impact areas is a direct result of the revised traffic analysis which reflects a downsizing of the project and associated traffic volumes for the “plus project” traffic scenarios.

The roadway links that were previously identified as being impacted in the January 2013 noise analysis contained in the Draft EIR and are not directly affected in the revised noise analysis for the Final EIR are listed below:

- *Day Street between Cottonwood Avenue and Alessandro Boulevard (#109);*
- *Fir Avenue between Quincy Drive and Redlands Boulevard (#62);*
- *Moreno Beach Drive between Locust Avenue and Ironwood Avenue (#56);*

¹ *Mainly Comments C-4-2 and F-13-9 and F-13-84.*

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- *Perris Boulevard between John F. Kennedy Drive and Iris Avenue (#303);*
- *Placentia Avenue from El Nido Avenue to Evans Road and on to Water Avenue (#431, #432);*
- *Quincy Drive from Cactus Avenue to Alessandro Boulevard and to Cottonwood Avenue (#502, #503);*
- *Reche Canyon Road from Keissel Road to Reche Vista Drive and on to High Country Drive (#205, #206);*
- *Redlands Boulevard from Eucalyptus Avenue to Dracaea Avenue (#12); and*
- *State Route 60 from Perris Boulevard to Nason Street (#31).*

There are five roadway segments that were previously identified in the January 2013 noise analysis contained in the Draft EIR that had a direct and cumulative impact. In the revised noise analysis for the Final EIR, these five roadway segments do not have a direct impact but have a cumulative impact only. These roadways are as follows:

- *Fir Avenue between Quincy Drive and Redlands Boulevard (#62);*
- *Gilman Springs Road between Eucalyptus Avenue and Street C (#31); and between Jack Rabbit Trail and Bridge Street (#191);*
- *Moreno Beach Drive between Locust Avenue and Ironwood Avenue (#56); and*
- *State Route 60 from Perris Boulevard to Nason Street (#31).*

The roadway link that was previously identified in the January 2013 noise analysis contained in the Draft EIR as being impacted and mitigation was considered infeasible is mitigated below a level of significance with feasible mitigation as shown in the revised noise analysis for the Final EIR:

- *Cactus Avenue west of Redlands Boulevard.*

This section of the EIR is intended to satisfy the City's requirements for a project-specific noise impact analysis by examining the short-term and long-term noise impacts of the proposed project on sensitive uses adjacent to the proposed project area and by evaluating the effectiveness of mitigation measures. This includes the potential for the proposed project to result in impacts associated with a substantial temporary and/or permanent increase in ambient noise levels in the vicinity of the project area; exposure of people to excessive noise levels, groundborne vibration, or groundborne noise levels.

CEQA requires an analysis of the proposed project's impacts on the existing environment; not an analysis on the existing environment's impacts on the proposed project. The occasional blow downs that occur at the Southern California Gas Company (SCGC) are part of the existing conditions and have been part of the existing conditions for years. Thus, for purposes of clarity, it should be noted that the impact analysis below goes beyond the requirements of CEQA and provided as part of an analysis to ensure worker safety. All mitigation measures imposed in this analysis are the responsibility of future developers and not SCGC.

Note: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 29 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The analysis contained in this section is based on the following technical study prepared for the proposed project:

- *Noise Assessment for the World Logistic Center Specific Plan*, Mestre Greve Associates, original dated January 24, 2013, revised dated September 2014 (Appendix K of this Revised DEIR).

In addition to these project-specific technical studies, the analysis contained in this section is also based on the following reference documents:

- *California Noise Insulation Standards*, California Code of Regulations, Title 24, Part 2, §3501;
- *Highway Traffic Noise Prediction Model (FHWA-RD-77-108)*, Federal Highway Administration (FHWA);
- *City of Moreno Valley General Plan*, City of Moreno Valley, July 2006;
- *Moreno Valley Municipal Code*, City of Moreno Valley, current through Ordinance 836 and the February 2012 code supplement; and
- *State of California General Plan Guidelines*, Governor's Office of Planning and Research, October 2003, pages 249 and 250.

4.12.1 Existing Setting

4.12.1.1 Background

Characteristics of Noise. To the human ear, sound is technically described in terms of its loudness (amplitude) and pitch (frequency). Pitch is generally an annoyance, while loudness can affect our ability to hear. Noise is usually defined as unwanted sound; it consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

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Measurement of Noise. The standard unit of measurement of the loudness of sound is the decibel (dB). Decibels are based on a logarithmic scale. The logarithmic scale compresses the wide range in sound levels resulting in a more usable range of sound level values, similar to the Richter scale used to measure earthquakes. To humans, a sound 10 dB higher than another is considered to be twice as loud; a sound 20 dB higher than another is considered four times as loud; etc. Typical daily sounds in the environmental range from 30 dB (very quiet) to 100 dB (very loud).

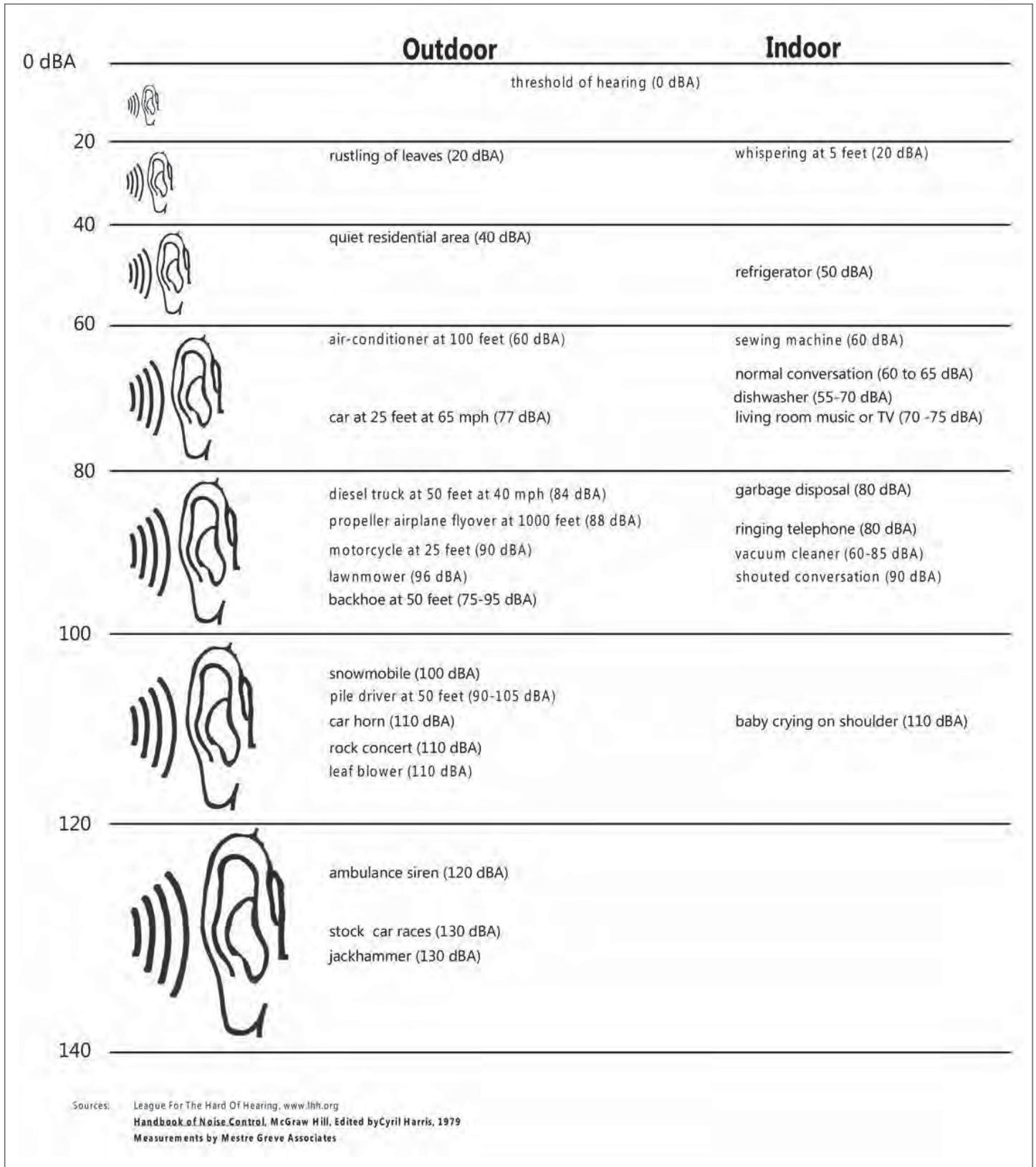
Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel (dBA) scale performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear. Community noise levels are measured in terms of the dBA. Figure 4.12.1 shows examples of various noises sources and their typical dBA noise level.

There are two categories of noise that are measured to characterize noise conditions: single event noise and community or cumulative noise. Single event measurements describe the noise levels from an individual event such as a passing airplane or a heavy-duty truck. Cumulative measurements average the total noise in a community over a specific time period, which is typically 1 or 24 hours.

The noise impact analysis performed for this EIR is based on assessment of both single event noise and community or cumulative noise. Several rating scales have been developed for measurement of community noise. These account for: (1) the parameters of noise that have been shown to contribute to the effects of noise on humans; (2) the variety of noises found in the environment; (3) the variations in noise levels that occur as a person moves through the environment; and (4) the variations associated with the time of day. They are designed to account for the known health effects of noise on people described previously. Based on these effects, the observation has been made that the potential for a noise to affect people is dependent on the total acoustical energy content of the noise. A number of noise scales have been developed to account for this observation. Two of the predominant noise scales are the Equivalent Noise Level (L_{eq}) and the Community Noise Equivalent Level (CNEL). L_{eq} is the sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over a given sample period. L_{eq} is the “energy” average noise level during the time period of the sample. L_{eq} can be measured for any time period, but is typically measured for 1 hour. This 1-hour noise level can also be referred to as the Hourly Noise Level (HNL). It is the energy sum of all the events and background noise levels that occur during that time period.

CNEL is the predominant rating scale now in use in California for land use noise compatibility assessment. The CNEL scale represents a time weighted 24-hour average noise level based on the dBA. Time weighted refers to the inclusion of penalties for noise that occurs during certain noise-sensitive time periods. The evening time period (7 p.m. to 10 p.m.) penalizes noises by 5 dBA, while nighttime (10 p.m. to 7 a.m.) noises are penalized by 10 dBA, reflecting people’s increased sensitivity to noise during these time periods. A CNEL noise level may be reported as a CNEL of 60 dBA, 60 dBA CNEL, or simply 60 CNEL.

L(%) is a statistical method of describing noise which accounts for variance in noise levels throughout a given measurement period. L(%) is a way of expressing the noise level exceeded for a percentage of time in a given measurement period. For example, since 5 minutes is 25 percent of 20 minutes, L(25) is the noise level that is equal to or exceeded for five minutes in a twenty-minute measurement period. It is L(%) that is used for most Noise Ordinance standards. For example most daytime County, State and City noise ordinances use a standard of 55 dBA for 30 minutes per hour, or an L(50) level of 55 dBA. In other words, the noise ordinance may state that no noise level should exceed 55 dBA for more than fifty percent of a given period.



LSA

FIGURE 4.12.1

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Typical A-Weighted Noise Levels

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The maximum noise level (L_{max}) is the highest exponential time averaged sound level that occurs during a stated time period. The noise levels discussed in this analysis for short-term noise impacts are specified in terms of maximum levels denoted by L_{max} , which reflects peak noise conditions and addresses the annoying aspects of intermittent noise. It is often used together with another noise scale, or noise standards in terms of percentile noise levels, in noise ordinances for enforcement purposes. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level. Half the time the noise level exceeds this level, and half the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, the L_{eq} and L_{50} are approximately the same.

Fundamentals of Groundborne Vibration. Vibration refers to groundborne noise and perceptible motion of the earth. Similar to noise, vibration is transmitted in noise-like waves through the earth and solid objects.

There are several ways to categorize vibration sources. One way is to divide vibration into natural sources (e.g., earthquakes, volcanic eruptions, sea waves, and landslides) and human sources (e.g., explosions, machinery, traffic, trains, and construction equipment). Similar to noise sources, vibration sources can also be described as continuous (e.g., operating factory machinery) or transient (e.g., explosions).

As with noise, ground vibrations can be described by amplitude and frequency. Vibration amplitude is characterized by its displacement, velocity, and acceleration. Displacement is the distance that soil particles travel from their original location as a result of vibration, as measured in inches or millimeters. Velocity is the speed of the soil particles measured in inches per second or millimeters per second. Acceleration is the acceleration of the soil particles measured in inches per second per second or millimeters per second per second. Particle velocity is the most commonly used vibration attribute used to describe vibration. Table 4.12.A presents the human reaction to various levels of peak particle velocity. Vibrations also vary in frequency. Traffic vibrations generally range in frequencies from 10 to 30 hertz (Hz), and tend to average around 15 Hz. As a point of reference, city buses often generate frequencies around 3 Hz at high vehicle speeds, due to their suspension systems.

Table 4.12.A: Human Reaction to Typical Vibration Levels

Vibration Level Peak Particle Velocity (inches/second)	Human Reaction
0.0059–0.0188	Threshold of perception, possibility of intrusion.
0.0787	Vibrations readily perceptible.
0.0984	Level at which continuous vibrations begin to annoy people.
0.1968	Vibrations annoying to people in buildings.
0.3937–0.5905	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges.

Source: Caltrans 1992.

Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernable. However, without the effects associated with the shaking of a building, there is less adverse reaction. Building vibration may be perceived by the occupants as motion of building surfaces, rattling of items on shelves or hanging on walls, or as a low-frequency rumbling noise. Building damage is not a factor for normal projects, with the occasional exception of blasting and pile driving during construction or mining. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by up to 10 decibels. This is an order of magnitude below the damage threshold for normal buildings.

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Typical sources of groundborne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with groundborne vibration and noise from these sources are usually localized to within about 100 feet of the vibration source, although there are examples of groundborne vibration causing interference out to distances greater than 200 feet, as described in the FTA Transit Noise and Vibration Impact Assessment (FTA, May 2006). When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible.

Factors that influence groundborne vibration and noise include the following:

- *Vibration Source:* Vehicle suspension, wheel types and condition, track/roadway surface, track support system, speed, transit structure, and depth of vibration source.
- *Vibration Path:* Soil type, rock layers, soil layering, depth to water table, and frost depth.
- *Vibration Receiver:* Foundation type, building construction, and acoustical absorption.

Among the factors listed above, there are significant differences in the vibration characteristics when the source is underground versus at ground surface. In addition, soil conditions are known to have a strong influence on the levels of groundborne vibration. Among the most important factors are the stiffness and internal damping of the soil and the depth to bedrock. Vibration propagation is more efficient in stiff clay soils than in loose sandy soils, and shallow rock seems to concentrate the vibration energy close to the surface and can result in groundborne vibration problems at a great distance from the track. Factors such as layering of the soil and depth to water table can have significant effects on the propagation of groundborne vibration. Soft, loose, sandy soils tend to attenuate more vibration energy than hard, rocky materials. Vibration propagation through groundwater is more efficient than through sandy soils.

4.12.1.2 Sensitive Land Uses in the Project Vicinity

Certain land uses are considered more sensitive to noise than others. Examples include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The project vicinity and Specific Plan area are characterized by a mix of developed and undeveloped properties. Developed properties in the vicinity include an industrial/warehouse building in Moreno Valley to the northwest (Skechers) and several residential neighborhoods along Redlands Boulevard along the western boundary of the project site. An area of the City known as “Old Moreno” is situated near the southwest portion of the project site, around the intersection of Redlands and Alessandro Boulevards. The homes along Merwin Street, east of Redlands Boulevard, constitute the closest sensitive receptors to the project site (i.e., they are adjacent to the property).

4.12.1.3 Existing Noise Measurements

Existing noise levels in the vicinity of the proposed project are used to establish baseline noise levels in key areas. Noise measurements within the project site and in the surrounding area were taken. The noise measurement locations were selected to provide coverage of the project’s potential noise impact area. The noise measurement locations are shown in Figure 4.12.2.

Noise measurements were taken at sixteen sites in the project vicinity during the daytime hours (between 7 a.m. and 10 p.m.) and during nighttime hours (between 10 p.m. and 7 a.m.). For each measurement site and time period, noise levels were measured for 15 minutes and calibrated to ensure that the measured sound level readings were accurate. The measurements were used to calculate existing L_{eq} , L_{min} , L_{max} , $L_{1.7}$, $L_{8.3}$, L_{25} and L_{50} values for the measurement locations. Table 4.12.B shows the results for the daytime measurements, and Table 4.12.C shows the nighttime measurements.

4.12.1.4 Existing Traffic Noise Environment

The primary existing noise sources in the project area are transportation facilities. Traffic on SR-60, Redlands Boulevard, Theodore Street, Gilman Springs Road, and other local streets is the dominant source contributing to the ambient noise levels in the project vicinity. Noise from motor vehicles is generated by engine vibrations, the interaction between the tires and the road, and the exhaust system. Table 4.12.D identifies the existing (2012) traffic noise levels adjacent to roadway segments in the project vicinity.

4.12.1.5 Existing SDG&E and SCGC Facilities

The proposed World Logistics Center Specific Plan area is currently occupied by one San Diego Gas and Electric Company (SDG&E) compressor station and two Southern California Gas Company (SCGC) facilities. These facilities are located within the boundaries of the Specific Plan as shown in previously referenced Figure 4.12.2. The SDG&E compressor station recompresses natural gas received from interstate gas pipelines and delivers the gas to Southern California via transmission pipelines. The two SCGC facilities contain flow valve and metering equipment facilities. The southern SCGC facility contains a maintenance functions as well. All of these facilities contain gas pipeline blow-down equipment. This equipment includes exhaust stacks that vent the high pressure gas into the atmosphere occur during emergencies, scheduled maintenance, and annual testing of the blow-down systems.

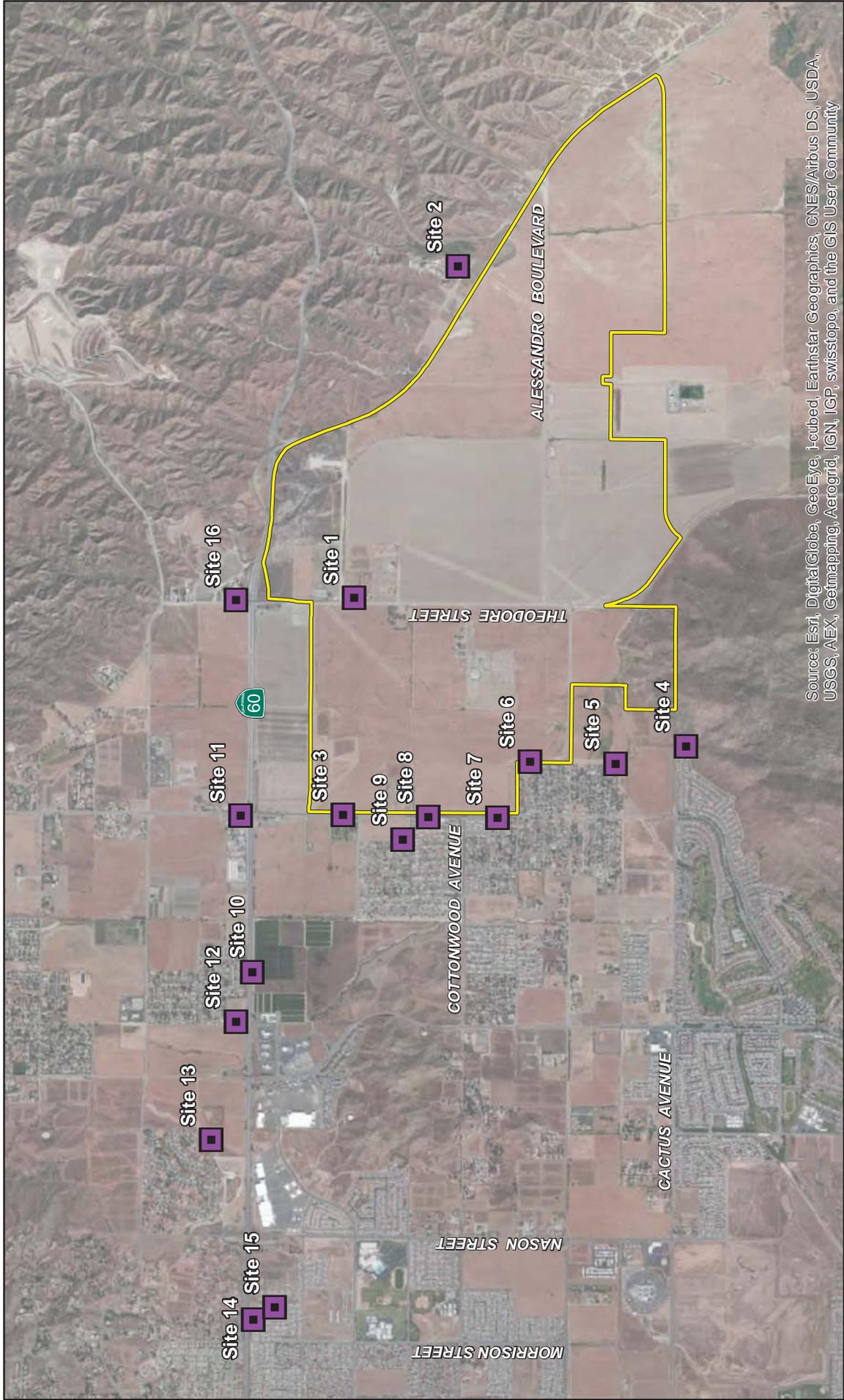
The SDG&E and SCGC facilities produce noise from three different sources that could affect future development within the proposed project: 1) the operation of the compressor station; 2) blow-down events at the compressor station; and 3) blow-down events at the SCGC facilities. The blow-down events generate infrequent high noise levels for relatively short periods. The compressor station generates a relatively constant noise level, although noise levels vary slightly when the compressors are turned on and off when the gas is conveyed to the transmission pipelines.

The SDG&E compressors are the primary source of operational noise generated by the compressor station. The facility contains two sets of three reciprocating natural gas combustion engines and one set of four natural gas-fired turbines, for a total of ten compressors with power ranging from 995 to 3,400 horsepower. The compressors are located within noise attenuation structures and are equipped with intake and exhaust silencers. The facility routinely operates at maximum capacity 24 hours per day. It is anticipated that demand on the compressor station will increase in the future to the point where the facility operates 24 hours a day, year round.

The CNEL levels for the SDG&E compressor station presented in Figure 4.12.3 are based on a worst-case assumption that the compressor station is in full operation 24 hours a day. Figure 4.12.4 presents the average (L_{eq}) noise levels generated by the compressor station during full operation. Both the CNEL and L_{eq} metrics are used to assess the noise impacts from the facility.

There are several blow-down points within the SDG&E compressor station. As stated previously, these blow-down points allow for the release of pressurized gas during emergencies, scheduled maintenance, and annual testing. Blow-down events at the compressor station vent gas and last between 30 and 90 seconds. The maximum sound levels (L_{max} dBA) generated by the blow-down events is presented in Figure 4.12.5.

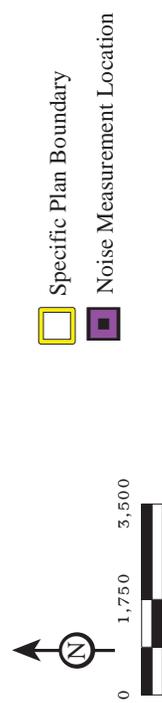
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Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

FIGURE 4.12.2

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Table 4.12.B: Existing Daytime Noise Measurements (dBA)

Site	Date	Start Time	L _{eq}	L _{max}	L _{1.7}	L _{8.3}	L ₂₅	L ₅₀	L _{min}
1	1-25-12	9:38 a.m.	55.4	72.0	63.0	56.5	54.0	53.0	48.7
2	1-25-12	10:15 a.m.	53.6	68.8	61.0	57.0	53.5	50.5	44.0
3	1-25-12	10:42 a.m.	66.3	73.7	73.0	71.5	68.0	61.5	43.5
4	1-25-12	11:04 a.m.	40.8	50.3	46.0	43.5	41.0	39.5	35.9
5	1-25-12	11:27 a.m.	40.4	56.9	48.0	44.5	39.5	36.0	31.4
6	1-25-12	11:48 a.m.	46.1	68.3	51.5	41.0	37.5	34.0	30.0
7	1-25-12	12:08 p.m.	57.7	75.3	66.5	63.0	55.5	47.5	34.8
8	1-25-12	12:30 p.m.	65.1	85.5	73.5	70.0	63.0	56.5	39.0
9	1-25-12	12:50 p.m.	42.9	55.8	53.0	46.0	41.5	37.5	33.5
10	1-25-12	1:48 p.m.	49.2	68.0	56.0	48.0	46.5	45.0	40.5
11	1-25-12	2:10 p.m.	60.4	73.0	66.5	64.5	61.0	58.0	47.2
12	1-25-12	2:32 p.m.	51.2	58.4	55.5	53.5	51.5	50.5	44.7
13	1-25-12	2:52 p.m.	45.8	59.8	52.0	48.0	45.5	44.0	39.9
14	1-25-12	3:15 p.m.	65.5	73.3	70.0	68.5	66.5	64.5	54.4
15	1-25-12	3:39 p.m.	52.6	72.1	59.5	55.5	51.5	49.5	42.9
16	1-25-12	4:08 p.m.	58.7	75.2	67.0	59.0	57.0	55.0	50.5

Table 4.12.C: Existing Nighttime Noise Measurements (dBA)

Site	Date	Start Time	L _{eq}	L _{max}	L _{1.7}	L _{8.3}	L ₂₅	L ₅₀	L _{min}
1	2-8-12	11:51 p.m.	50.6	64.5	59.0	54.5	50.5	45.5	36.0
2	2-6-12	10:30 p.m.	47.4	65.1	52.5	50.0	48.0	45.5	37.5
3	2-6-12	10:55 p.m.	61.8	75.9	71.0	67.5	58.0	54.0	45.9
4	2-6-12	11:33 p.m.	35.8	51.1	44.0	39.0	34.5	32.0	30.0
5	2-9-12	12:15 a.m.	36.4	46.6	42.5	39.5	36.0	35.0	31.5
6	2-7-12	12:15 a.m.	43.2	51.0	49.5	46.5	44.0	41.5	35.3
7	2-7-12	12:35 a.m.	51.5	66.9	64.0	54.0	41.5	37.5	32.6
8	2-7-12	12:55 a.m.	56.0	74.1	68.0	57.0	42.5	38.5	33.6
9	2-9-12	12:35 a.m.	41.5	57.1	50.5	44.5	38.0	36.0	30.4
10	2-9-12	1:01 a.m.	46.7	63.8	50.5	48.5	46.5	45.0	38.1
11	2-9-12	1:25 a.m.	59.6	68.3	67.5	64.5	60.5	54.0	46.3
12	2-9-12	1:48 a.m.	51.8	63.9	58.0	55.0	52.0	50.0	39.2
13	2-9-12	2:09 a.m.	48.0	59.7	55.5	52.0	47.5	45.0	38.6
14	2-9-12	2:33 a.m.	60.8	72.3	68.0	65.5	61.0	57.5	44.9
15	2-9-12	2:56 a.m.	48.2	59.9	54.5	52.5	49.0	45.0	35.4
16	2-9-12	3:20 a.m.	54.3	62.7	60.0	58.5	55.5	52.0	38.8

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Table 4.12.D: Existing Traffic Noise Levels (dBA)

Roadway Segment	CNEL (dBA) at 100 feet
Alessandro Boulevard (Lasselle Street and Morrison Street)	55.5
Alessandro Boulevard (Morrison Street to Nason Street)	56.8
Alessandro Boulevard (Nason Street to Oliver Street)	64.4
Cactus Avenue (Nason Street to Oliver Street)	64.3
Cactus Avenue (Oliver Street to Moreno Beach Drive)	58.2
Cactus Avenue (Redlands Boulevard to Street D)	50.2
Cactus Avenue (west of Redlands Boulevard)	57.5
Canyon Crest Drive (Alessandro Boulevard to Sandtrack Road)	41.8
Canyon Crest Drive (Central Avenue to Country Club Drive)	67.0
Country Club Drive (Chicago Avenue to Canyon Crest Drive)	57.5
Crescent Avenue (west of Alessandro Road)	57.1
Day Street (Cottonwood Avenue to Alessandro Boulevard)	57.7
Elsworth Street (Cottonwood Avenue to Alessandro Boulevard)	62.9
Evans Road (Marbella Gate to Ramona Expressway)	56.9
Gilman Springs Road (Bridge Street to Beaumont Avenue)	61.0
Gilman Springs Road (Bridge Street to SR-79 Southbound Ramps)	61.0
Gilman Springs Road (Eucalyptus Avenue to Street C)	46.1
Gilman Springs Road (Jack Rabbit Trail to Bridge Street)	62.7
Gilman Springs Road (south of Street C)	56.1
Gilman Springs Road (SR-79 Northbound Ramps to Record Road)	60.7
Heacock Street (Alessandro Boulevard to Cactus Avenue)	59.7
Heacock Street (Cactus Avenue to John F Kennedy Drive)	62.6
Indian Street (Alessandro Boulevard to Cactus Avenue)	59.9
Indian Street (Cactus Avenue to John F Kennedy Drive)	59.3
Iris Avenue (Kitching Street to Lasselle Street)	60.31
Iris Avenue (Lasselle Street to Nason Street)	57.0
Iris Avenue (Nason Street to Oliver Street)	60.0
Iris Avenue (Perris Boulevard to Kitching Street)	60.8
Ironwood Avenue (Moreno Beach Drive to Redlands Boulevard)	55.6
Ironwood Avenue (Redlands Boulevard to Highland Boulevard)	46.3
John F Kennedy Drive (south of Cactus Avenue)	61.5
Kitching Street (Alessandro Boulevard to Cactus Avenue)	58.2
Kitching Street (Cactus Avenue to John F Kennedy Drive)	59.1
Kitching Street (Iris Avenue to Ivory Avenue)	61.1
Kitching Street (Krameria Avenue to Lurin Avenue)	62.4
Krameria Avenue (Perris Boulevard to Lasselle Street)	57.5
Lasselle Street (Cahuilla Drive to Krameria Avenue)	60.5
Lasselle Street (Cottonwood Avenue to Alessandro Boulevard)	64.4
Lasselle Street (Krameria Avenue to Arroyo Park Drive)	56.4
Live Oak Canyon Road (San Timoteo Canyon Road to I-10)	56.5
Lochmoor Drive (Central Avenue to Fair Isle Drive)	52.1
Locust Avenue (Moreno Beach Drive to Redlands Boulevard)	55.7
Locust Avenue (Moreno Beach Drive to Smiley Boulevard)	46.2
Mission Grove Parkway (Alessandro Boulevard to Northrop Drive)	58.1
Mission Grove Parkway (Cannon Road to Alessandro Boulevard)	62.5

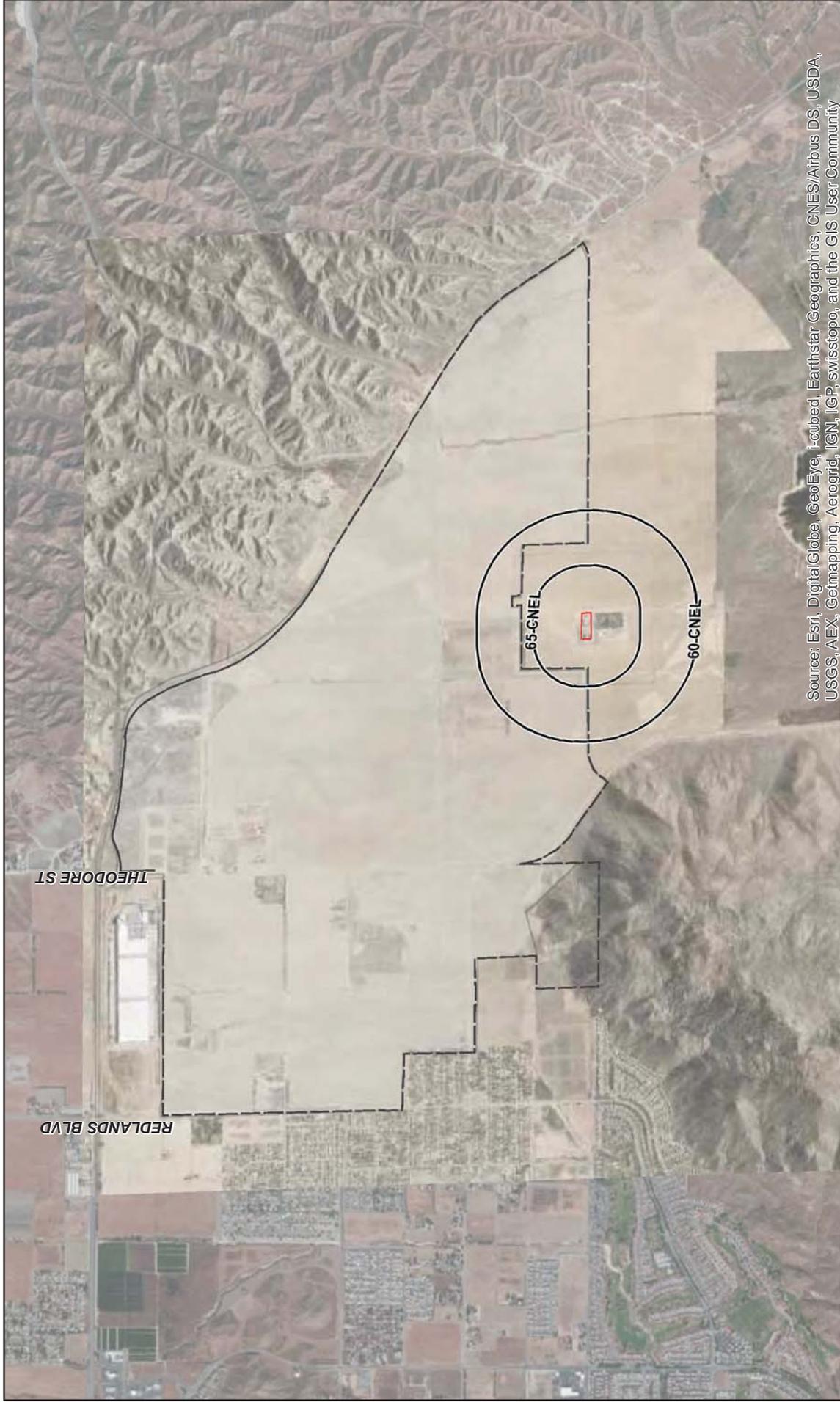
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Table 4.12.D: Existing Traffic Noise Levels (dBA)

Roadway Segment	CNEL (dBA) at 100 feet
Moreno Beach Drive (John F Kennedy Drive to Cactus Avenue)	57.6
Moreno Beach Drive (John F Kennedy Drive to Oliver Street)	55.2
Moreno Beach Drive (Locust Avenue to Ironwood Avenue)	55.3
Old 215 Frontage Road (Eucalyptus Avenue to Alessandro Boulevard)	61.4
Orange Avenue (Evans Road to Foothill Drive)	55.3
Perris Boulevard (Alessandro Boulevard to Cactus Avenue)	61.0
Perris Boulevard (Alessandro Boulevard to Cottonwood Avenue)	61.9
Perris Boulevard (Cactus Avenue to John F Kennedy Drive)	62.0
Perris Boulevard (Iris Avenue to Krameria Avenue)	60.8
Perris Boulevard (John F Kennedy Drive to Iris Avenue)	67.2
Perris Boulevard (Krameria Avenue to Harley Knox Boulevard)	60.7
Perris Boulevard (Krameria Avenue to Harley Knox Boulevard)	59.6
Perris Boulevard (Sunnymead Boulevard to Fir Avenue)	69.0
Ramona Expressway (Evans Road to Rider Street)	59.2
Reche Canyon Road (Keissel Road to Reche Vista Drove)	62.7
Reche Vista Drive (Heacock Street to Reche Canyon Road)	66.7
Redlands Boulevard (Ironwood Avenue to San Timoteo Canyon Road)	67.8
Redlands Boulevard (Ironwood Avenue to SR-60)	68.3
Redlands Boulevard (SR-60 to Eucalyptus Avenue)	58.8
San Timoteo Canyon Road (Alessandro Road to Live Oak Canyon Road)	62.0
San Timoteo Canyon Road (Live Oak Canyon Road to Redlands Boulevard)	62.7
Street A (Eucalyptus Avenue to Street F)	47.0
Sunset Drive (Alessandro Road to Cameo Drive)	52.5
Sunset Drive (Crown Street to Alessandro Road)	49.0
Sycamore Canyon Boulevard (Central Avenue to College Boulevard)	62.8
Theodore Street (SR-60 to Highland Boulevard)	53.6
Freeways	
SR-60 (Heacock Street to Perris Boulevard)	65.2
SR-60 (Moreno Beach Drive to Redlands Boulevard)	62.5
SR-60 (Perris Boulevard to Nason Street)	64.6
SR-60 (Pigeon Pass Road/Frederick Street to Heacock Street)	66.5
SR-60 (Redlands Boulevard to Theodore Street)	60.2

Source: Mestre Greve Associates, September 2014.

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Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

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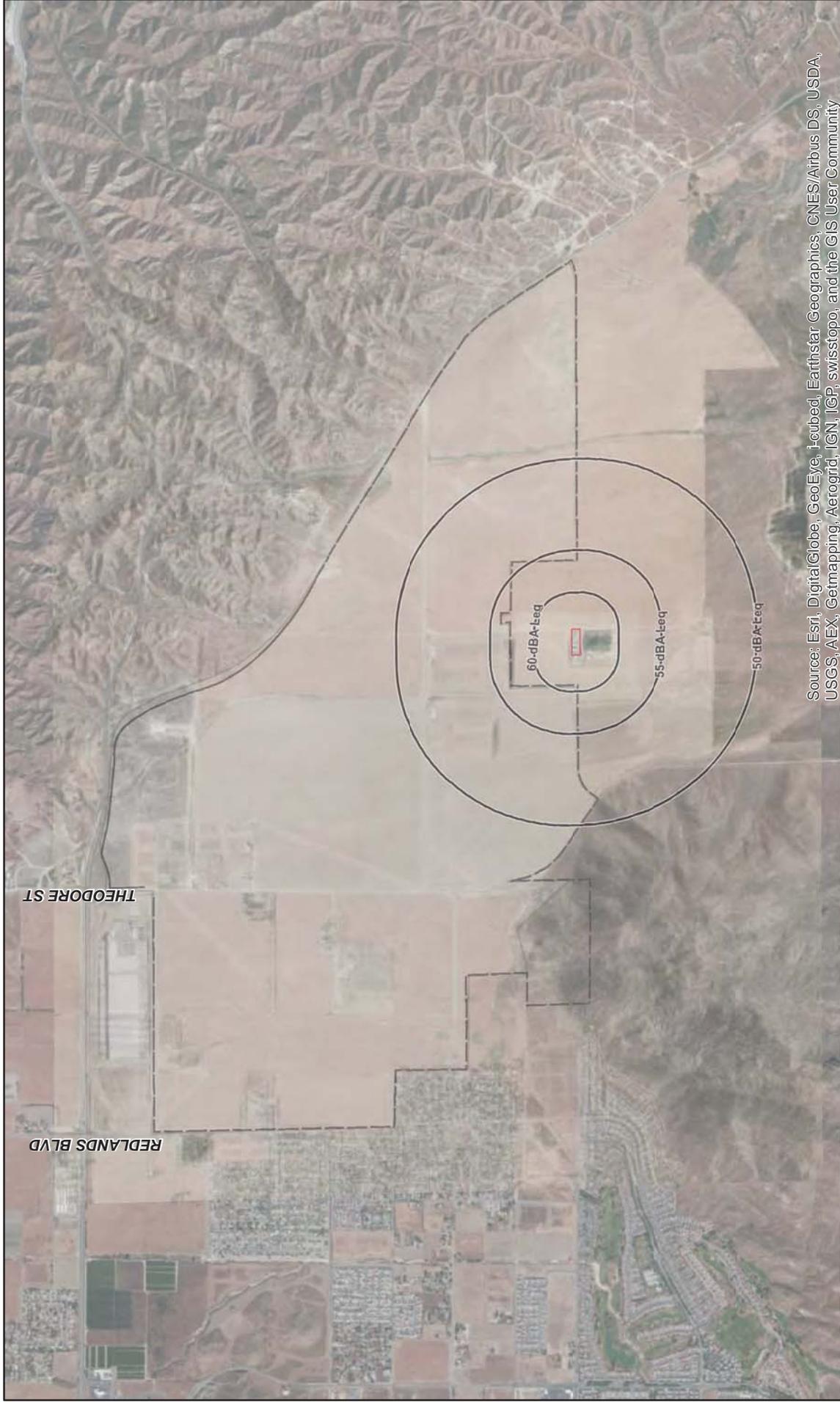


SOURCE: Mestres Greve Associates, 2013.

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FIGURE 4.12.3

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Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

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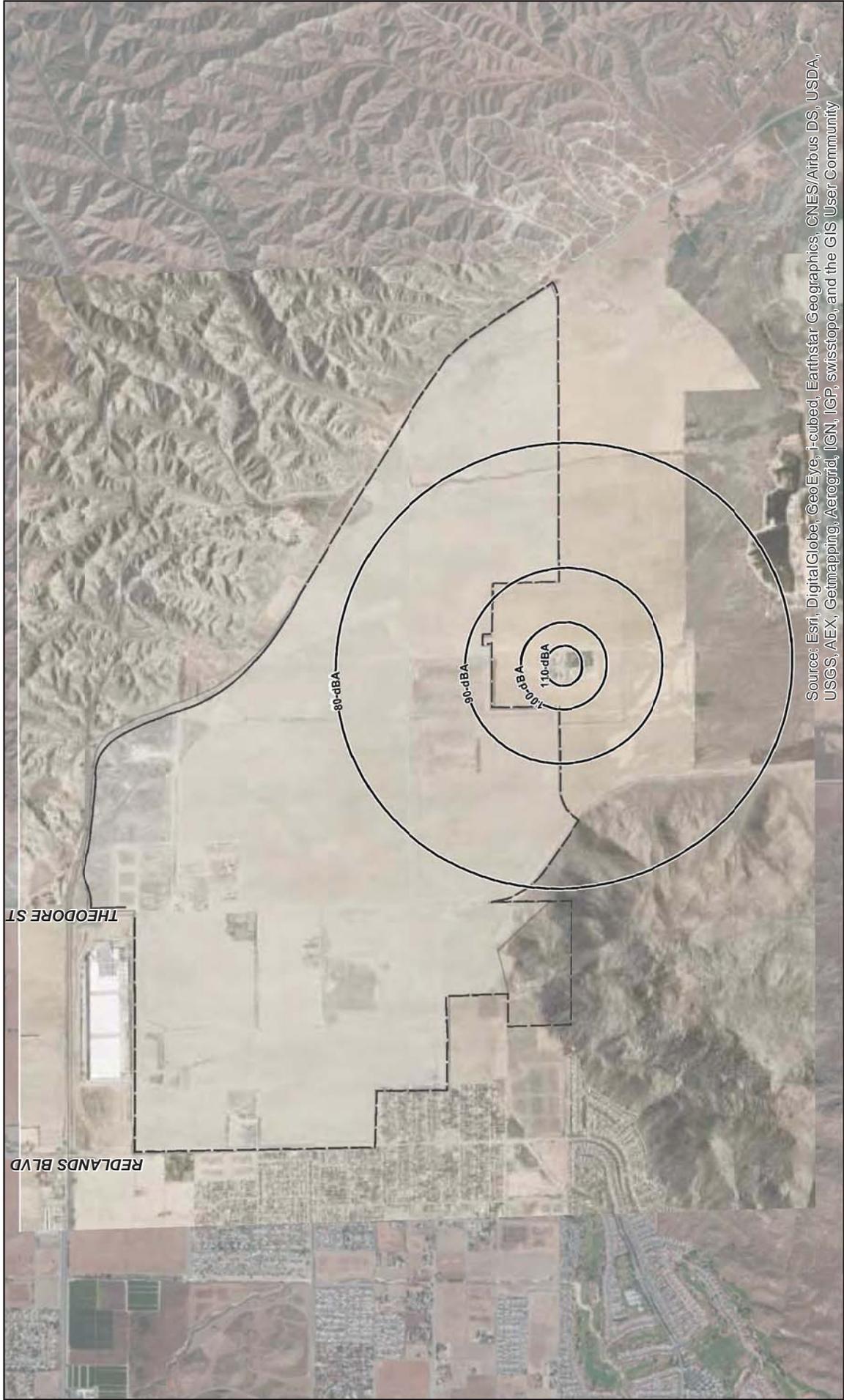


SOURCE: Mestres Greve Associates, 2013.

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FIGURE 4.12.4

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Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

FIGURE 4.12.5

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There are blow-down points in the SCGC facilities. Blow-down events at the SCGC facilities vent gas from miles of pipeline and are much longer than those at the compressor station, and can last up to 90 minutes. Approximately four blow-down events occur annually at the SCGC facilities. L_{max} noise levels (dBA) are shown in Figure 4.12.6. The noise level will be at or near the L_{max} level during the entire blow-down event. It should also be noted that blow-down events generate ground vibrations and natural gas odors in the vicinity in the surrounding area when events occur. Again, it must be noted that these blow-down events are part of the existing conditions of the project site, and any impacts caused by development of new warehousing near these facilities, and any mitigation necessary, are not the responsibility of SCGC or SDG&E.

4.12.2 Existing Policies and Regulations

The applicable noise standards governing the project site are the criteria in the City of Moreno Valley General Plan Safety Element (Environmental Safety, Noise) and Municipal Code (Noise Ordinance). The City's Safety Element of the General Plan does not contain specific noise standards or significance thresholds. However, the General Plan does cite applicable State standards including the California Administrative Code, Section 1092 of Title 25, Chapter 1, Subchapter 1, Article 4 and Section 5014 of Title 21, Subchapter 6, Article 2. In addition, other applicable standards identified in the *California Noise Insulation Standards*¹ and the *State of California Vehicular Code*² are included below. The following sections list the General Plan policies, Municipal Code, and State standards relevant to noise for the proposed project.

4.12.2.1 City of Moreno Valley General Plan Policies

Chapter 9 of the *City of Moreno Valley General Plan*³ defines goals, objectives, policies, and action items related to noise conditions in the City. The specific policies related to noise that are relevant to the proposed project are as follows:

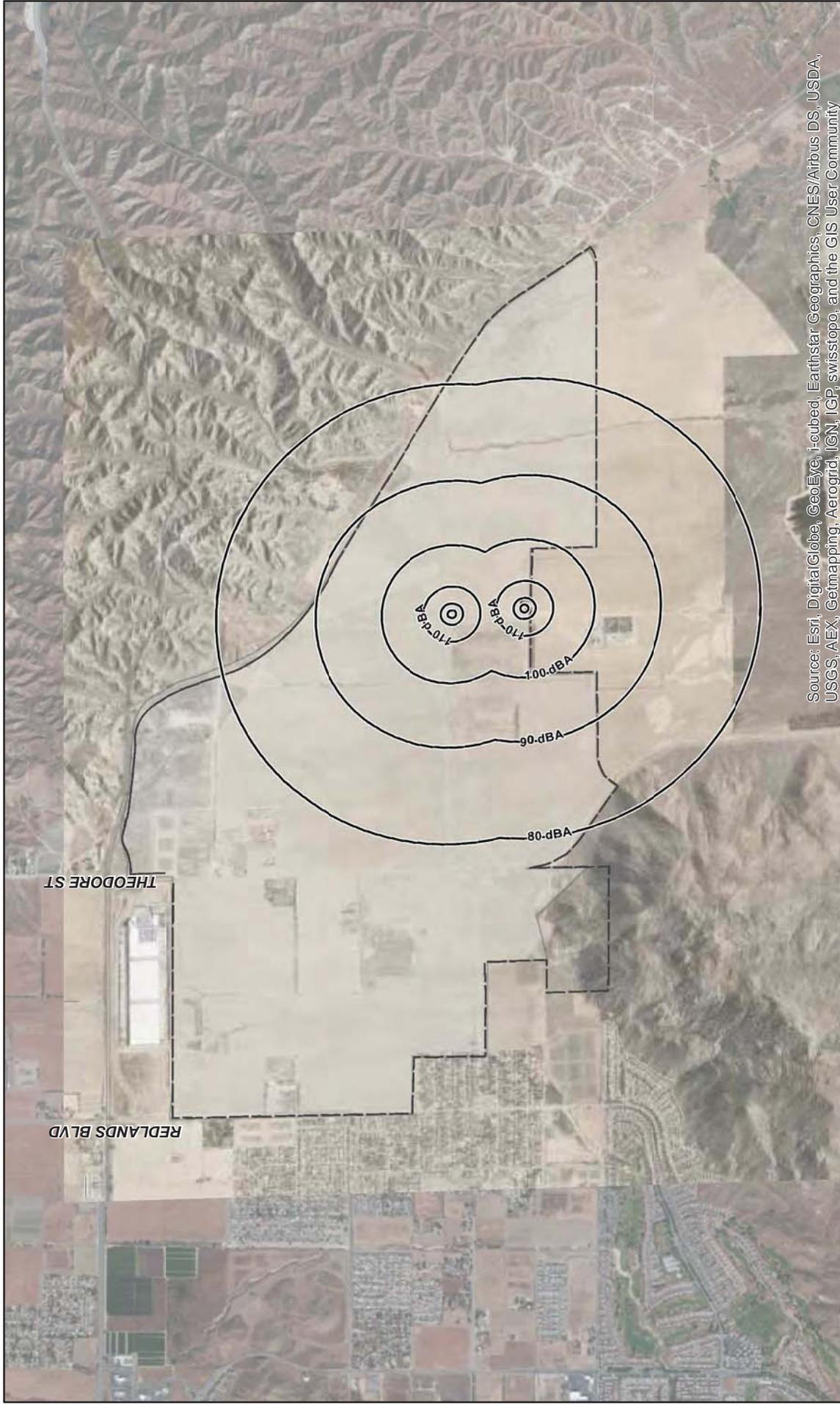
- Objective 6.3** Provide noise compatible land use relationships by establishing noise standards utilized for design and siting purposes.
- Policy 6.3.5** Enforce the California Administrative Code, Title 24 noise insulation standards for new multi-family housing developments, motels and hotels.
- Policy 6.3.6** Building shall be limited in areas of sensitive receptors.
- Objective 6.4** Review noise issues during the planning process and require noise attenuation measures to minimize acoustic impacts to existing and future surrounding land uses.
- Policy 6.4.1** Site, landscape and architectural design features shall be encouraged to mitigate noise impacts for new developments, with a preference for noise barriers that avoid freeway sound barrier walls.
- Objective 6.5** Minimize noise impacts from significant noise generators such as, but not limited to, motor vehicles, trains, aircraft, commercial, industrial, construction, and other activities.
- Policy 6.5.1** New commercial and industrial activities (including the placement of mechanical equipment) shall be evaluated and designed to mitigate noise impacts on adjacent uses.
- Policy 6.5.2** Construction activities shall be operated in a manner that limits noise impacts on surrounding uses.

¹ California Code of Regulations, Title 24, Part 2, §3501, *California Noise Insulation Standards*.

² Governor's Office of Planning and Research, *State of California General Plan Guidelines*, October 2003, pages 249 and 250.

³ *City of Moreno Valley General Plan*, City of Moreno Valley, July 2006.

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FIGURE 4.12.6

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4.12.2.2 City of Moreno Valley Municipal Code

The *Moreno Valley Municipal Code*¹ establishes a Noise Ordinance that describes the noise standards within the City. Chapter 11.80.030 (Title 11) lists specific prohibited acts.

The City's residential site development standards, as identified in Chapter 9.03.040 of the City's Planning and Zoning Code, state that in all residential districts, air conditioners, heating, cooling, and ventilating equipment and all other mechanical lighting or electrical devices shall be operated so that noise levels do not exceed 60 dBA (L_{dn}) at the property line.

The City's Municipal Code, Section 6.04.030.J states that "to create, allow or maintain any loud or unusual noise or operate or maintain any device, instrument, vehicle, or machinery in such a manner as to create loud or unusual noise, cause vibrations, or unreasonable light spillage or glare which causes discomfort or annoyance to reasonable persons of normal sensitivity, or which endangers the comfort, repose, health or peace of the public or of any person using or occupying other property in the vicinity" is prohibited.

The City's Municipal Code, Section 9.10.140, specifies that all commercial and industrial uses shall be operated so that noise created by any loudspeaker, bells, gongs, buzzers, or other noise attenuation or attracting devices shall not exceed 55 dBA at any one time beyond the boundaries of the property.

Chapter 11.80.030 of the City's Municipal Code also states:

Based on statistics from the Center for Disease Control and Prevention and the National Institute for Occupational Safety and Health, Table 1 and Table 1-A specify sound level limits which, if exceeded, will have a high probability of producing permanent hearing loss in anyone in the area where the sound levels are being exceeded. No sound shall be permitted within the City which exceeds the parameters set forth in Table 11.80.030-1 [Table 4.12.E] and 11.80.030-1-A [Table 4.12.F] of this chapter.

No person shall maintain, create, operate or cause to be operated on private property any source of sound in such a manner as to create any nonimpulsive sound which exceeds the limits set forth for the source land use category (as defined in Section 11.80.020) in Table 11.80.030-2 [Table 4.12.F] when measured at a distance of two hundred (200) feet or more from the real property line of the source of the sound, if the sound occurs on privately owned property, or from the source of the sound, if the sound occurs on public right-of-way, public space or other publicly owned property. Any source of sound in violation of this subsection shall be deemed prima facie to be a noise disturbance.

The following uses and activities shall be exempt from the sound level regulations except the maximum sound levels provided in Tables 11.80.030-1 [Table 4.12.E] and 11.80.030-1A [Table 4.12.F]:

- 1. Sounds resulting from any authorized emergency vehicle when responding to an emergency call or acting in time of an emergency.*
- 2. Sounds resulting from emergency work as defined in Section 11.80.020.*
- 3. Any aircraft operated in conformity with, or pursuant to, federal law, federal air regulations and air traffic control instruction used pursuant to and within the duly adopted federal air regulations; and any aircraft operating under technical difficulties in any kind of distress, under emergency orders or air traffic control, or being operated pursuant to and subsequent to the declaration of an emergency under federal air regulations.*

¹ *Moreno Valley Municipal Code*, City of Moreno Valley, current through Ordinance 836 and the November 2012 code supplement.

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4. All sounds coming from the normal operations of interstate motor and rail carriers, to the extent that local regulation of sound levels of such vehicles has been preempted by the Noise Control Act of 1972 (42 U.S.C. § 4901 et seq.) or other applicable federal laws or regulations.
5. Sounds from the operation of motor vehicles, to the extent they are regulated by the California Vehicle Code.
6. Any constitutionally protected noncommercial speech or expression conducted within or upon any public right-of-way, public space or other publicly owned property constituting an open or a designated public forum in compliance with any applicable reasonable time, place and manner restriction on such speech or expression or otherwise pursuant to legal authority.
7. Sounds produced at otherwise lawful and permitted city-sponsored events, organized sporting events, school assemblies, school playground activities, by permitted fireworks, and by permitted parades on public right-of-way, public space, or other publicly owned property.
8. An event for which a temporary use permit or special event permit has been issued under other provisions of this code, where the provision of Section 11.80.010 are met, the permit granted expressly grants an exemption from specific standards contained in this chapter, and the permittee and all persons under the permittee's reasonable control actually comply with all conditions of such permit. Violation of any condition of such permit related to sound or sound equipment shall be in violation of this chapter and punishable as such.

Table 4.12.E and Table 4.12.F show the maximum sound levels that are permitted in the City for continuous and impulsive sounds, respectively.

Table 4.12.E: Maximum Continuous Sound Levels*

Duration Per Day Continuous Hours	Sound Level (dBA)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
0.5	110
0.25	115

* When the daily sound exposure is composed of two or more periods of sound exposure at different levels, the combined effect of all such periods shall constitute a violation of this section if the sum of the percentage of allowed period of sound exposure at each level exceeds 100 percent.

Source: Chapter 11.80.030 Table 11.80.030-1, City of Moreno Valley Municipal Code, City of Moreno Valley.

Table 4.12.F: Maximum Impulsive Sound Levels

Number of Repetitions Per 24-Hour Period	Sound Level (dBA)
1	145
10	135
100	125

Source: Chapter 11.80.030 Table 11.80.030-1A, City of Moreno Valley Municipal Code, City of Moreno Valley.

The City also restricts the sound levels for non-impulsive sound on lands designated for residential and commercial land uses during the daytime and nighttime time periods. These levels are shown in

Table 4.12.G. Section 11.80.050 (3) clearly identifies the measurement as an “average” noise level, and therefore, the noise limits shown in Table 4.12.G are interpreted as the L_{eq} noise level.

Table 4.12.G: Maximum Sound Levels (in dBA) for Source Land Uses

Residential		Commercial	
Daytime	Nighttime	Daytime	Nighttime
60	55	65	60

Source: Chapter 11.80.030 Table 11.80.030-2, City of Moreno Valley Municipal Code, City of Moreno Valley.

The City prohibits all construction and demolition activities between the hours of 8:00 p.m. and 7:00 a.m. the day following a noise disturbance. A noise disturbance is defined as any sound which that disturbs a reasonable person of normal sensitivities, exceeds the sound level limits set forth in the Noise Ordinance, or is plainly audible. A noise disturbance is defined as plainly audible measured at a distance of 200 feet from the real property line of the source of the sound if the sound occurs on privately owned property, or from the source of the sound, if the sound occurs on public right-of-way, public space or other publicly owned property.

4.12.2.3 State of California Vehicle Code

Recent studies have shown that the most objectionable feature of traffic noise is the sound produced by vehicles equipped with illegal or faulty exhaust systems. In addition, such vehicles are often operated in a manner that causes tire squeal and excessively loud exhaust noise. A number of California State vehicle noise regulations can be enforced by local authorities as well as the California Highway Patrol. These include § 27150 (mufflers) of the California Vehicle Code (CVC), as well as excessive speed laws, which may be applied to curtail traffic noise. The California Highway Patrol and the Department of Health Services (through local health departments) are available to aid local authorities in code enforcement and training pursuant to proper vehicle sound level measurements.

4.12.2.4 State of California Noise Compatibility Guidelines

The State of California Noise Compatibility Guidelines, published by the Department of Health, Services provides guidance for use when siting land uses. The compatibility guidelines are shown in Figure 4.12.7. The guidelines will be used to evaluate the compatibility of the proposed land uses with the noise environment. The guidelines show compatibility of various land uses with different noise environments. The guidelines show that industrial uses are normally acceptable in noise environments up to 75 CNEL.

4.12.3 Methodology

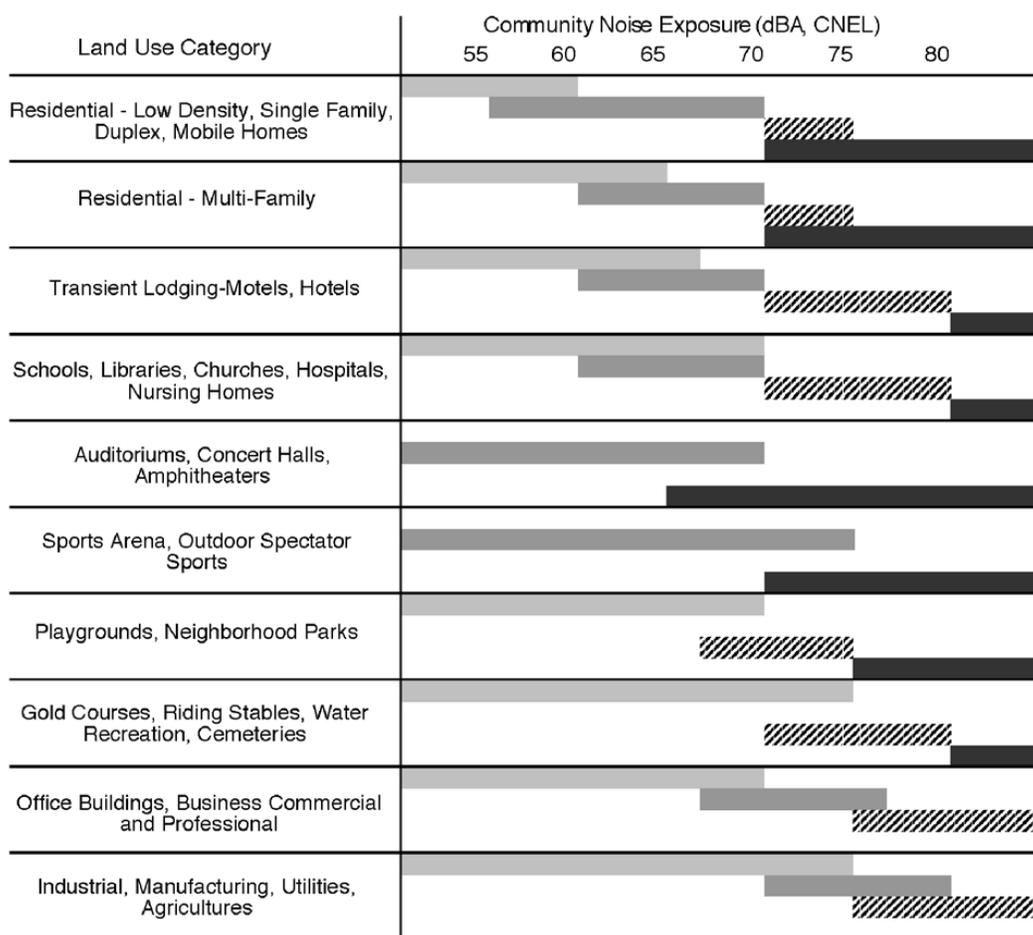
Evaluation of noise impacts associated with the proposed project includes the following:

- Determination of the short-term construction noise impacts on off-site noise-sensitive uses;
- Determination of the long-term noise impacts, including vehicular traffic and stationary noise sources, on on-site and off-site noise-sensitive uses; and
- Determination of the required mitigation measures to reduce long-term noise impacts from all sources.

Because of the location of noise-sensitive receptors, the noise analysis evaluates the noise effects of the industrial development on the existing residential development (sensitive receptors) near the southwest portion of the proposed project area.

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Land Use/Noise Compatibility Guidelines



- 
Normally Acceptable Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements
- 
Conditionally Acceptable - New construction or development shall be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system of air conditioning, will normally suffice.
- 
Normally Unacceptable New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design
- 
Clearly Unacceptable New construction or development should generally not be undertaken

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FIGURE 4.12.7

*World Logistics Center Specific Plan Project
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California Noise Compatibility Guidelines

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There are no Federal Highway Administration (FHWA), State, or local standards for vibration. According to the FHWA, highway traffic and construction vibrations pose no threat to buildings and structures; and annoyance to people is not considered any worse than other discomforts experienced from living near highways. However, a substantial amount of research has been completed to compare vibrations from single events such as dynamite blasts with architectural and structural damage. The U.S. Bureau of Mines has set a safe limit of 0.5 inch per second peak particle velocity to avoid structure damage in residential structures (U.S. Bureau of Mines 1980). Below this level, there is virtually no risk of building damage.

4.12.4 Thresholds of Significance

A project would have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or if it would conflict with adopted environmental plans and goals of the community in which it is located.

The applicable noise standards and guidelines governing the project are those specified previously in Sections 4.12.2.1 through 4.12.2.4. In summary, these criteria are contained within the Safety Element of the General Plan, the Municipal Code, the California Vehicle Code, and the State Noise Compatibility Guidelines.

For this project, a noise impact is considered significant if the project would result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the *City of Moreno Valley General Plan*, *Moreno Valley Municipal Code*, or applicable standards of other agencies;
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial temporary, periodic, and/or permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels; and/or
- For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

The standards within the *City of Moreno Valley General Plan* and *Moreno Valley Municipal Code* determine the acceptable noise environment for proposed project and its vicinity. The standards are as follows:

- To the extent feasible, ensure through the design review process that exterior noise levels at commercial and industrial areas do not exceed 75 dBA CNEL.
- Consider the following uses noise-sensitive and discourage them in areas where exterior noise levels exceed 65 dBA CNEL unless measures are implemented that reduce the noise exposure below this level: single-family and multiple-family residential uses, group homes, hospitals, schools and other learning institutions, and parks and open space areas where quiet is a basis for use.

Long-term impacts from the project's traffic noise that affect existing sensitive land uses are considered to be substantial and, therefore, constitute a significant noise impact if the project would:

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- Increase noise levels by 5 dB or more where the no project noise level is less than 60 CNEL;
- Increase noise level by 3 dB or more where the no project noise level is 60 CNEL to 65 CNEL; or
- Increase noise levels by 1.5 dB or more where the no project noise level is greater than 65 CNEL.

The project’s incremental contribution to a cumulative noise increase would be considered cumulatively considerable and significant when ambient noise levels affect noise-sensitive land uses and when the project increases noise levels by 1 dB or more over pre-project conditions and the predicted future cumulative with project noise levels cause the following cumulative increases:

- Increase noise levels by 5 dB or more where the existing noise level is less than 60 CNEL;
- Increase noise levels by 3 dB or more where the existing noise level is 60 to 65 CNEL; or
- Increase noise levels by 1.5 dB or more where the existing noise level is greater than 65 CNEL.

4.12.5 No Impact/Less than Significant Impacts

The following impacts were identified as having a less than significant impact or no impact on the environment with implementation of the proposed project.

4.12.5.1 Groundborne Vibration Impacts

Threshold	Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
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Roadways in the vicinity of the project area are either paved or would be paved as the area develops, and would not result in project traffic driving over rough or dirt roads. Well maintained roads typically do not result in substantial vibration levels. Even roads with irregularities typically only generate substantial levels of vibration very near, less than 50 feet from the irregularity. Construction activities that would occur within the WLCSP area are not anticipated to require blasting or pile driving. Roadway vibrations are typically not perceptible more than 50 feet from the roadway except in very unusual circumstances. Generally, the interface between the soft tire of a truck or automobile will not generate significant vibration unless the road is in poor shape (e.g., potholes or pavement joints) Therefore, impacts associated with this issue are anticipated to be less than significant, and no mitigation is required.

4.12.5.2 Airport Noise Impacts

Threshold	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, results in exposure of people residing or working in the project area to excessive noise levels. For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.
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The project area is located approximately 5.5 miles northeast of the March Airfield (MAF) and is not located within two miles of a private airstrip. The MAF is a joint-use airport, used for both military and civilian purposes. The March Air Reserve Base (MARB) is the military operator of the MAF and March Inland Port (MIP) is the civilian operator of the airport. This facility is anticipated to play an increasingly important role in the transportation of goods and cargo for the Southern California region. Existing flight patterns affect a large portion of the City of Moreno Valley, along a path that affects the

western portion of the City in a northwest/southeast alignment. Aircraft operations from the airport currently contribute intermittent single-event noise.

There is potential for single-event noise exposure levels from MAF activity to affect the proposed project. The exposure levels will vary dependent upon the type of aircraft and flight track flown for each operation at MAF. However, the proposed project is not identified as being within the noise or safety contours delineated for the MARB Airport.¹ In addition, the proposed project is not considered to contain sensitive receivers and, therefore, the impacts from these single-event noise levels are considered to be below the level of significance. The City's exterior noise standard for industrial uses is 70 dBA CNEL. MAF noise levels are less than 60 dB CNEL within the project area. Therefore, the proposed project would not have the potential to expose people to excessive noise levels from airport operations. Therefore, no significant noise impacts would occur regarding these issues from implementation of the proposed project, and no mitigation is required.

4.12.6 Significant Impacts

4.12.6.1 Short-Term Construction Noise Impacts

Threshold	Would the project result in a substantial temporary, periodic, and/or permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
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Short-term noise would occur during the construction of the WLCSP. First, construction crew commutes and the transport of construction equipment and materials to the site for the proposed WLC project would incrementally increase noise levels on access roads in the WLC planning area. In addition, noise would be generated during excavation, grading, and building construction on various portions of the Specific Plan site. Construction is completed in discrete steps, each of which has its own mix of equipment, and consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels, because the noisiest construction equipment is earthmoving equipment, which includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three to four minutes at lower power settings. Implementation of the Specific Plan would result in construction activities that would require the use of scrapers, bulldozers, and water and pickup trucks within the WLCSP area.

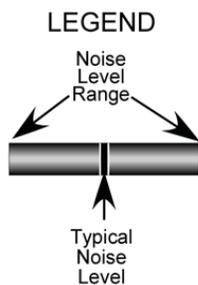
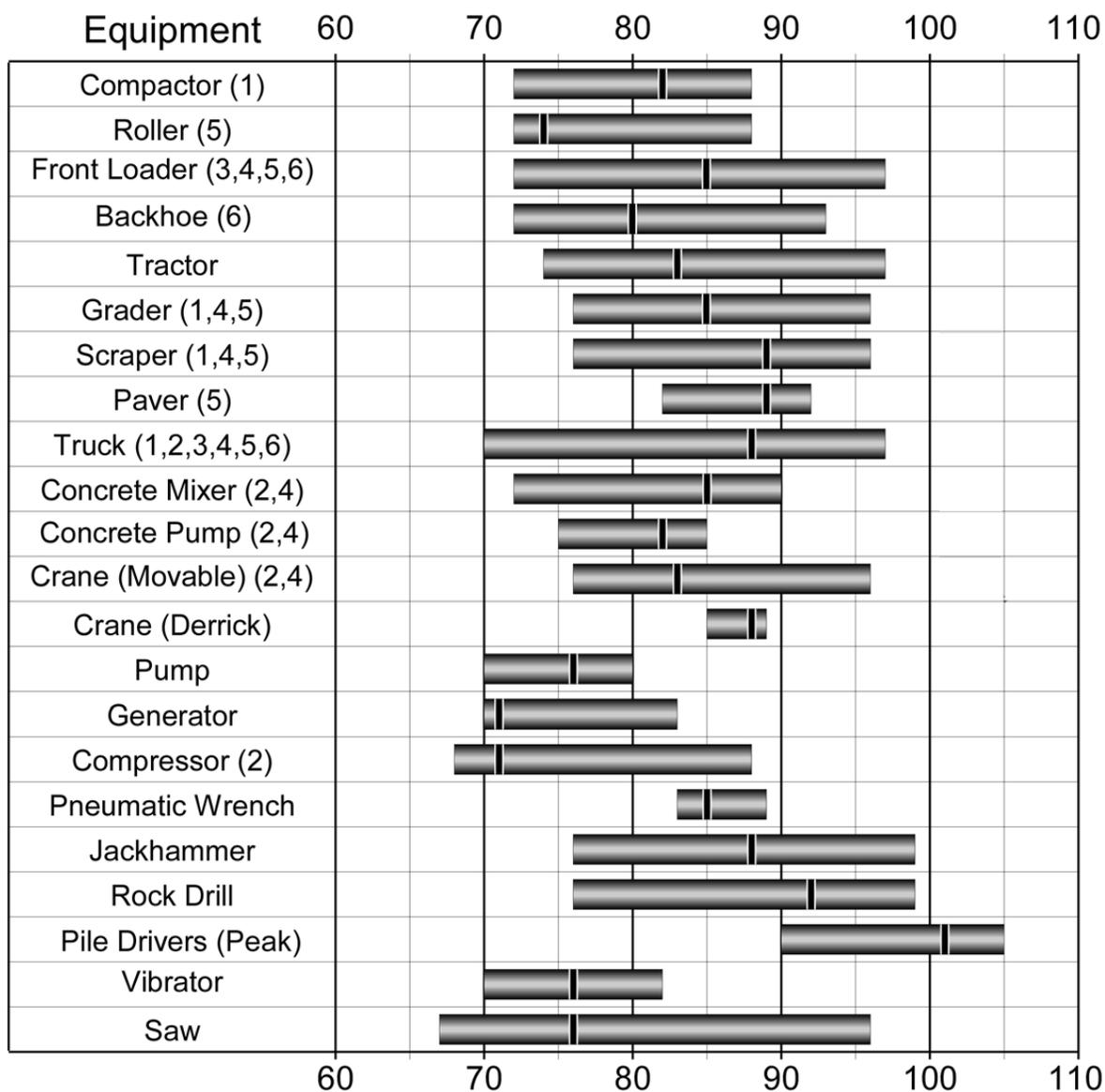
Figure 4.12.8 presents construction noise levels measured at 50 feet. The peak noise level for the majority of the equipment that will be used during construction of the proposed project will range from 70 to 95 dBA. Based on the fact that noise levels dissipate with increases in distance from the noise source due to noise divergence, noise levels at greater distances are less than those presented in Figure 4.12.8. Noise measurements made by Mestre Greve Associates demonstrate that the noise levels generated by commonly used grading equipment (e.g., loaders, graders, and trucks) generate noise levels that typically do not exceed the middle of the range shown in Figure 4.12.8.² However, the noise levels shown in Figure 4.12.8 have been used as the basis for the noise analysis estimates presented in this EIR.

¹ Figure 5.4-1 March Reserve Air Base Noise Impact Area, City of Moreno Valley General Plan EIR, July 2006.

² Noise Assessment for the World Logistic Center Specific Plan, page 27, Mestre Greve Associates, Division of Landrum & Brown, September 2014.

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A-Weighted Sound Level (dBA) At 50 Feet



Construction Phases

- 1 - Grading
- 2 - Building
- 3 - Utilities
- 4 - Interchange
- 5 - Curbing and Paving
- 6 - Landscaping

L S A

FIGURE 4.12.8

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Construction activities that are associated with the proposed WLCSP project would occur in two general areas: on-site and off-site. Some phases of the on-site construction would occur for 24 hours a day for 7 days a week. It is anticipated that on-site construction would occur periodically over a nine-year period with a potential start year of 2015 and ending in 2030. Off-site construction (which would involve minor grading, drainage, interchange, utility, and roadway improvements) is anticipated to only during the daytime weekday hours and would have a shorter construction duration.

On-site Construction. Sensitive receptors that would be potentially affected by on-site construction activities would include residences located within and adjacent to the WLCSP area as well as residences located on the north side of SR-60. For residences on the opposite side of SR-60, existing daytime and nighttime freeway noise is anticipated to be greater than the noise generated by the construction activities that would occur within the WLCSP area. Although certain conditions at night, such as low inversions and very calm conditions, can increase the ability of construction noise to travel to the residences north of the freeway, these same conditions would also amplify the noise generated on the freeway. Since freeway noise would continue to be the dominant noise source in the area for these residences along SR-60, construction noise impacts on the residents north of the freeway will be less than significant and no mitigation is required.

Existing residences within the WLCSP area or adjacent to the Specific Plan area may be located within 50 feet or less from areas where intense construction (24 hours a day, 7 days a week) would occur. Although residential properties located within the WLCSP would be rezoned as Light Logistics, the existing residences are considered to be noise-sensitive uses that would be affected by intense construction activities. Similarly, residences located adjacent to the project site (i.e., along Redlands Boulevard, Merwin Street, Bay Avenue, Cactus Avenue, and Gilman Springs Road) would also be affected by intense construction activities. Based on a 50-foot noise attenuation distance, these residences may experience worst-case unmitigated peak construction noise levels (L_{max}) up to 97 dBA. The average noise levels are typically 5 to 15 dB lower than the peak noise levels. Average noise levels (L_{eq}) at 50 feet could easily be in the range of 82 to 92 dBA during most phases of construction.

The City of Moreno Valley Municipal Code does not include any exemptions for construction noise. Therefore, construction would be subject the limitations of 60 dBA during daytime and 55 dBA at nighttime measured at residential areas. According to Section 3.4.14, *Project Description*, WLC project construction may occur 24 hours a day, 7 days a week for certain activities. Significant noise impacts would be expected, especially if work with high noise levels occurs between 8:00 p.m. and 6:00 a.m.

Based on these projections, anticipated worst-case construction noise levels would regularly be exceeded during daytime and nighttime hours at residences within the Specific Plan area. Based on an L_{eq} noise level of 90 dBA at 50 feet, an observer would need to be 1,580 feet from the construction to experience a noise level of 60 dBA (L_{eq}), or 2,800 feet for a noise level of 55 dBA (L_{eq}). Therefore, a residence within 1,580 feet during active construction during the daytime would be affected. Similarly, a residence within 2,800 feet during the nighttime would be affected by construction noise.

As set forth in Section 3.4.14 and as stated by the project applicant, construction could occur 24 hours per day, 7 days per week for these construction activities. Therefore, noise levels at the nearest residences would exceed the City's exterior noise standard of the 60 dBA¹ CNEL daytime standard and 55 dBA CNEL nighttime standard for residential uses. This is a significant impact requiring mitigation.

¹ Chapter 11.80.030 Table 11.80.030-2, City of Moreno Valley Municipal Code, City of Moreno Valley.

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Off-site Construction. Construction activities associated with off-site construction include road improvements along Cactus Avenue and Redlands Boulevard, water and utility improvements, construction of a detention basin, debris basins, and interchange improvements. Roadway and interchange improvements are planned along Cactus Avenue, Redlands Boulevard, State Route 60, and Gilman Springs Road. Often the loudest pieces of equipment associated with this type of construction are the graders/scrapper equipment. Peak noise levels at 50 feet can reach 96 dBA, with average noise levels (L_{eq}) in the 85 dBA range. Noise levels of 60 dBA (L_{eq}) could be exceeded for up to 900 feet from the construction area. Existing residences are located within 900 feet of the off-site construction areas and would be exposed to noise levels that would exceed of the Moreno Valley noise criteria for residential uses.

Other off-site construction improvements such as drainage, sewer, water, and utility features would also generate noise in close proximity to existing sensitive uses. However, these activities typically utilize less construction equipment, which results in lower noise levels. These construction activities may commonly employ a backhoe as the loudest piece of equipment. A backhoe may have a peak noise level that exceeds 90 dBA at 50 feet, but has an average noise level around 80 dBA (L_{eq}) at 50 feet. However, at this noise level one would need to be more than 500 feet away to experience a noise level (L_{eq}) of less than 60 dBA. This noise level would exceed the City's daytime criteria at the nearest existing residences and mitigation measures would be required.

Specific Plan Design Features. The WLCSP does not contain any design features that specifically address noise. Other features, such as perimeter setback requirements, will have the effect of reducing noise to certain residential areas.

Note: The following changes to the mitigation measures were made as a result of the revised project noise assessment (Appendix K in FEIR Volume 2) and in responses to Comments C-4-2 in Letter C-4 from Sempra Energy and Comments F-13-9 and F-13-84 in Letter F-13 from Johnson & Sedlack on behalf of the Sierra Club, Moreno Valley Group & Residents for a Livable Moreno Valley.

Mitigation Measures. Construction of the proposed project would result in noise levels at the closest residences exceeding the maximum noise level allowed under the City's Municipal Code. The following measures¹ would reduce short-term construction-related noise impacts associated with the proposed WLC project:

- 4.12.6.1A** Prior to issuance of any discretionary project approvals, a Noise Reduction Compliance Plan (NRCP) shall be submitted to and approved by the City. The Noise Reduction Compliance Plan shall show the limits of nighttime construction in relation to any then-occupied residential dwellings and shall be in conformance with City standards. Conditions shall be added to any discretionary projects requiring that the limits of nighttime grading be shown on the Noise Reduction Compliance Plan and all grading plans submitted to the City (per Noise Study MM N-2, pg. 51).
- 4.12.6.1B** All construction equipment, fixed or mobile, shall be equipped with operating and maintained mufflers consistent with manufacturers' standards.
- 4.12.6.1C** Construction vehicles shall be prohibited from using Redlands Boulevard south of Eucalyptus Avenue to access on-site construction for all phases of development of the Specific Plan (per Noise Study MM N-1, pg. 51).

¹ Measures 4.12.6.1B-F corresponds to the noise study measures N-1 through N-5.

- 4.12.6.1D** No grading shall occur within 2,800 feet of residences south of State Route-60 between 8 p.m. and 6 a.m. on weekdays and between 8 p.m. and 7 a.m. on weekends. These restrictions shall be included as part of the Noise Reduction Compliance Plan per Mitigation Measure 4.12.6.1A (per Noise Study MM N-2, pg. 51)
- 4.12.6.1E** As an alternative to Mitigation Measure 4.12.6.1D, a 12-foot tall temporary construction sound barrier may be installed for residences within 1,580 feet of active nighttime construction areas. The temporary sound barrier shall be constructed of plywood with a total thickness of 15 inches, or a sound blanket wall may be used. If sound blankets are used, they must have a Sound Transmission Class (STC) rating of 27 or greater. This shall be included as part of the Noise Reduction Compliance Plan required in Mitigation Measure 4.12.6.1A, which shall be reviewed and approved by the City prior to implementation (per Noise Study MM N-2 and N-3, pg. 51 and pg. 52).
- 4.12.6.1F** As an alternative to Mitigation Measure 4.12.6.1D and 4.12.6.1E, on-site noise measurements of construction areas may be taken by qualified personnel and specific buffer distances between construction activities and existing residences may be proposed based on actual noise levels. These measurements will be incorporated into the Noise Reduction Compliance Plan required in Mitigation Measure 4.12.6.1A, which shall be reviewed and approved by the City prior to implementation (per Noise Study MM N-2, pg. 51).
- 4.12.6.1G** Any discretionary approvals for development that proposes grading within 1,580 feet of occupied residential units shall require that all grading equipment be equipped with residential grade mufflers (or better). All stationary construction equipment shall be placed so that emitted noise is directed away from noise-sensitive receptors nearest the site. Additionally, stationary construction equipment shall have all standard acoustic covers in place during operation (per Noise Study MM N-4, pg. 52).
- 4.12.6.1H** All material stockpiles in connection with any grading operations shall be located at least 1,200 feet from existing residences (per Noise Study MM N-5, pg. 52).
- 4.12.6.1I** All project-related off-site construction shall be limited to 6 a.m. and 8 p.m. on weekdays only. Construction during weekends and City holidays shall not be permitted (per Noise Study MM N-6, pg. 53) to the satisfaction of the Land Development Division/Public Works.
- 4.12.6.1J** Prior to issuance/approval of any grading permits, off-site construction activities adjacent to residential uses shall provide for installation of 12-foot temporary sound barriers for construction activities lasting more than one month. The sound barrier will reduce noise levels by approximately 10 dB. The temporary sound barrier may be constructed of plywood with a total thickness of 1.5 inches, or a sound blanket wall may be used. If sound blankets are used, the curtains must have a Sound Transmission Class (STC) rating of 27 or greater. No off-site construction is permitted during weekday nighttime hours (8 p.m. to 6 a.m.) or during weekends and City holidays except for emergencies (per Noise Study MM N-7, pg. 53).

Level of Significance after Mitigation. *On-site Construction.* Elimination of nighttime construction within 2,800 feet of residences would lower the noise levels to 55 dBA (L_{eq}) at the closest residences. The noise levels would just meet the 55 dBA (L_{eq}) nighttime criteria contained in the Moreno Valley Noise Ordinance resulting in a less than significant impact. With the implementation of **Mitigation Measures 4.12.6.1A** through **4.12.6.1J**, the loudest noise level that would be experienced at any developed residential parcel would be less than the 55 dBA (L_{eq}) nighttime threshold and would be consistent with the limits established in the City's Noise Ordinance resulting in a less than significant impact. In addition, implementation of **Mitigation Measure 4.12.6.1H**, would reduce the noise experienced at existing residences, resulting in a less than significant impact.

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As previously stated, construction within 1,580 feet of residential areas south of the freeway has the potential to exceed the daytime Moreno Valley Noise Ordinance criteria of 60 dBA (L_{eq}). With implementation of **Mitigation Measure 4.12.6.1E**, any existing residences within 1,580 feet of a construction area would be shielded from construction noise with a 12-foot temporary sound barrier. A sound barrier will reduce the noise levels by about 10 dB resulting in a reduction of noise below City thresholds at residences 500 feet or further from the construction area. Although the installation of the temporary sound barrier would reduce noise levels experienced at the closest residences, those residences that are located within 500 feet of a construction area would still be exposed to noise levels greater than 60 dBA (L_{eq}). Therefore, impacts associated with this issue would remain significant and unavoidable.

Off-site Construction. With the implementation of **Mitigation Measure 4.12.6.1I**, off-site construction activities would be limited to daytime hours while **Mitigation Measure 4.12.6.1J** would require the installation of a temporary sound barrier. With these mitigation measures in place, residences adjacent to construction activities (depending on the loudness of the construction equipment) could experience noise levels greater than 60 dBA (L_{eq}) for off-site construction projects lasting less than one month. These impacts would only occur during weekday daytime hours. However, even with implementation of these mitigation measures, noise levels experienced at these residences would be above the City’s threshold. Therefore, impacts would remain significant and unavoidable.

4.12.6.2 Long-Term Traffic Noise Impacts

Threshold	Would the project result in a substantial temporary, periodic, and/or permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
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The January 2013 noise analysis contained in the Draft EIR identified 33 roadway segments where a significant noise impact would occur for at least one of the impact scenarios. In the revised noise analysis for the Final EIR, 21 roadway segments have been identified as having a significant noise impact. The reduction in noise impact areas is a direct result of the revised traffic analysis which reflects a downsizing of the project and associated traffic volumes for the “plus project” traffic scenarios. The roadway links that were previously identified as being impacted in the January 2013 noise analysis contained in the Draft EIR and are not impacted in the revised noise analysis for the Final EIR are listed below:

- Day Street between Cottonwood Avenue and Alessandro Boulevard (#109);
- Fir Avenue between Quincy Drive and Redlands Boulevard (#62);
- Moreno Beach Drive between Locust Avenue and Ironwood Avenue (#56);
- Perris Boulevard between John F. Kennedy Drive and Iris Avenue (#303);
- Placentia Avenue from El Nido Avenue to Evans Road and on to Water Avenue (#431, #432);
- Quincy Drive from Cactus Avenue to Alessandro Boulevard and to Cottonwood Avenue (#502, #503);
- Reche Canyon Road from Keissel Road to Reche Vista Drive and on to High Country Drive (#205, #206);
- Redlands Boulevard from Eucalyptus Avenue to Dracaea Avenue (#12); and
- State Route 60 from Perris Boulevard to Nason Street (#31).

The noise analysis for the proposed project is based on the traffic volume data contained in the revised Traffic Impact Analysis (TIA) prepared for the project (contained in its entirety as EIR

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Appendix L). The TIA addressed the intersections of surface streets in Moreno Valley of a collector or higher classification street with another collector or higher classification street, at which the proposed project will add 50 or more peak hour trips. The study area also included the main travel routes between the project and the neighboring cities of Riverside, Perris, Beaumont, San Jacinto, and Redlands. The study area extended west to the nearest ramps on SR-91 and as far south as the I-215 ramps at Redlands Avenue in Perris. The study area for freeways was selected to cover the freeway routes radiating from the project site to the north, south, east, and west. The traffic analysis covered SR-60 from SR-62 in the east to SR-71 in the west, SR-91 from I-215 in the east to I-15 in the west, and I-215 from SR-210 in the north to the Scott Road interchange in the south.

Three hundred and thirty nine (339) roadway links and eighty nine (89) freeway segments were analyzed in the noise analysis. The change in noise level was calculated for all 428 roadway and freeway links with and without the project for the existing case (2012), 2022, and 2035 time horizons. Links with noise increases less than 1.5 dB would not have a substantial noise increase and were not presented in the main body of the noise report (i.e., the tables and figures). Similarly, any links that do not have sensitive receptors (e.g., residential uses) were also not presented in the main body of the noise report. Based on this filtering process, of the 428 links analyzed, 44 links have sensitive receptors and an increase of 1.5 dB for at least one time horizon and were therefore addressed in the analysis.

The projected future daily traffic volumes (Parsons Brinckerhoff, Inc., September 2014) for roadway segments in the project vicinity were used in the traffic noise impact analysis. Modeled noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. As previously identified, the threshold for traffic noise is 65 dBA CNEL for sensitive receptors.

Operation of development that could occur within the proposed project area would generate traffic along roadways in the project vicinity. Table 4.12.H identifies existing with project roadway traffic noise levels with the project.

Note: Table 4.12.H has been replaced in its entirety. Please refer to Final EIR Volume IV for the original Table 4.12.H, which can be found in section 4.12.6.2.

Table 4.12.H: Existing Year (2012) Plus Project Traffic Noise Levels (dBA)

Roadway Segment	CNEL (dBA) at 100 feet			
	Without Project	With Project	Change	Substantial Increase?
Alessandro Road (Crescent Avenue to Sunset Drive)	63.3	65.1	1.8	No
Alessandro Road (Sunset Drive to San Timoteo Canyon Road)	63.3	65.3	2.0	No
Cactus Avenue (Oliver Street to Moreno Beach Drive)	58.2	59.7	1.5	No
Cactus Avenue (Redlands Boulevard to Street D)	51.3	68.3	17.0	Yes
Cactus Avenue (west of Redlands Boulevard)	60.5	62.7	2.2	No
Crescent Avenue (west of Alessandro Boulevard)	57.1	59.6	2.6	No
Fir Avenue (Quincy Drive to Redlands Boulevard)	0.0	0.0	0.0	No
Gilman Springs Road (Bridge Street to Beaumont Avenue)	61.0	62.2	1.2	No
Gilman Springs Road (Bridge Street to SR-79 Southbound Ramps)	—	73.9	1.2	No
Gilman Springs Road (Eucalyptus Avenue to Street C)	49.6	55.0	5.4	Yes
Gilman Springs Road (Jack Rabbit Trail to Bridge Street)	62.7	63.9	1.2	No
Iris Avenue (Kitching Street to Lasselle Street)	60.1	61.6	1.6	No

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Table 4.12.H: Existing Year (2012) Plus Project Traffic Noise Levels (dBA)

Roadway Segment	CNEL (dBA) at 100 feet			
	Without Project	With Project	Change	Substantial Increase?
Iris Avenue (Lasselle Street to Nason Street)	60.0	62.4	2.4	No
Iris Avenue (Nason Street to Oliver Street)	63.0	65.9	2.9	No
Ironwood Avenue (Redlands Boulevard to Highland Boulevard)	46.3	57.3	11.0	Yes
John F Kennedy Drive (south of Cactus Avenue)	61.5	66.9	5.4	Yes
Krameria Avenue (Perris Boulevard to Lasselle Street)	57.5	60.6	3.1	No
Lasselle Street (Krameria Avenue to Arroyo Park Drive)	56.4	58.9	2.5	No
Live Oak Canyon Road (north of San Timoteo Canyon Road)	63.2	65.2	2.1	No
Live Oak Canyon Road (San Timoteo Canyon Road to I-10)	56.5	58.5	2.0	No
Locust Avenue (Moreno Beach Drive to Smiley Boulevard)	46.2	46.2	0.1	No
Locust Avenue (Moreno Beach Drive to Redlands Boulevard)	55.7	58.9	3.2	No
Moreno Beach Drive (John F Kennedy to Oliver Street)	55.2	58.7	3.5	No
Moreno Beach Drive (Locust Avenue to Ironwood Avenue)	55.3	57.2	1.9	No
Oliver Street (Alessandro Boulevard to Cactus Avenue)	54.1	56.4	2.2	No
Redlands Boulevard (Eucalyptus Avenue to Dracaea Avenue)	47.1	48.8	1.7	No
Redlands Boulevard (Ironwood Avenue to SR-60)	68.3	71.0	2.7	Yes
Redlands Boulevard (Ironwood Avenue to San Timoteo)	67.8	70.0	2.2	Yes
Redlands Boulevard (SR-60 to Eucalyptus Avenue)	60.9	64.5	3.4	Yes
San Timoteo Canyon Road (Alessandro Road to Live Oak Canyon Road)	62.0	65.1	3.1	Yes
San Timoteo Canyon Road (Live Oak Canyon Road to Redlands Boulevard)	62.7	65.7	3.0	Yes
Street A (Eucalyptus Avenue to Street F)	50.2	73.2	22.9	Yes
Street D (Street E to Cactus Avenue)	0.0	69.5	69.5	Yes
Street E (north of Alessandro Boulevard)	0.0	65.4	65.4	Yes
Street F (east of Street A)	0.0	68.4	68.4	Yes
Sunset Drive (Alessandro Road to Cameo Drive)	52.5	55.2	2.7	No
Sunset Drive (Crown Street to Alessandro Road)	49.0	51.4	2.3	No
Theodore Street (SR-60 to Highland Boulevard)	57.8	65.0	7.1	Yes
Freeways				
SR-60 (Pigeon Pass Road/Frederick Street to Heacock Street)	66.5	68.0	1.5	Yes
SR-60 (Heacock Street to Perris Boulevard)	65.2	66.9	1.7	Yes
SR-60 (Perris Boulevard to Nason Street)	64.6	66.7	2.1	No
SR-60 (Nason Street to Moreno Beach Drive)	52.0	54.3	2.3	No
SR-60 (Moreno Beach Drive to Redlands Boulevard)	62.5	65.5	3.1	Yes
SR-60 (Redlands Boulevard to Theodore Street)	60.2	63.5	3.4	Yes

Source: Mestre Greve Associates, September 2014.

As identified in Table 4.12.H, build out of the proposed WLC project would result in relatively minor changes in traffic noise levels in the Existing plus Project scenario case. The largest project-related increase in traffic noise would be along Streets D, E, and F where increases of greater than 65 dBA are predicted. The increase associated with these roadway segments is attributable in part to Streets D, E and F being new roads that will be constructed by the proposed project. A total of 18 road or

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freeway segments would result in a significant noise increase attributable to the project, resulting in a significant project direct impact requiring mitigation.

Year 2022 (Phase I) with and without project scenarios projected daily traffic volumes on roadway segments in the project vicinity were used to conduct the traffic noise modeling. The projected daily traffic volumes in the area were taken from the TIA prepared for the proposed project. Table 4.12.I identifies year 2022 without project and with project traffic noise levels.

Note: Table 4.12.I has been replaced in its entirety. Please refer to Final EIR Volume IV for the original Table 4.12.I, which can be found in section 4.12.6.2.

Table 4.12.I: Phase I (2022) Plus Project Traffic Noise Levels (dBA)

Roadway Segment	CNEL (dBA) at 100 feet			
	Without Project	With Project	Change	Substantial Increase?
Alessandro Road (Crescent Avenue to Sunset Drive)	64.6	65.4	0.8	No
Alessandro Road (Sunset Drive to San Timoteo Canyon Road)	65.0	65.8	0.8	No
Cactus Avenue (Oliver Street to Moreno Beach Drive)	58.9	59.8	0.9	No
Cactus Avenue (Redlands Boulevard to Street D)	51.3	66.8	15.5	Yes
Cactus Avenue (west of Redlands Boulevard)	61.3	62.5	1.2	No
Crescent Avenue (west of Alessandro Boulevard)	58.5	59.8	1.3	No
Fir Avenue (Quincy Drive to Redlands Boulevard)	0.0	0.0	0.0	No
Gilman Springs Road (Bridge Street to Beaumont Avenue)	61.2	62.1	0.9	No
Gilman Springs Road (Bridge Street to SR-79 Southbound Ramps)	72.9	73.8	0.9	No
Gilman Springs Road (Eucalyptus Avenue to Street C)	49.9	49.9	0.0	No
Gilman Springs Road (Jack Rabbit Trail to Bridge Street)	63.0	63.9	1.0	No
Iris Avenue (Kitching Street to Lasselle Street)	61.0	61.7	0.7	No
Iris Avenue (Lasselle Street to Nason Street)	61.1	62.3	1.2	No
Iris Avenue (Nason Street to Oliver Street)	63.8	65.5	1.6	No
Ironwood Avenue (Redlands Boulevard to Highland Boulevard)	51.9	56.1	4.2	No
John F Kennedy Drive (south of Cactus Avenue)	62.8	66.1	3.3	Yes
Krameria Avenue (Perris Boulevard to Lasselle Street)	60.5	61.2	0.7	No
Lasselle Street (Krameria Avenue to Arroyo Park Drive)	59.2	60.1	0.9	No
Live Oak Canyon Road (North of San Timoteo Canyon Road)	64.9	65.7	0.9	No
Live Oak Canyon Road (San Timoteo Canyon Road to I-10)	58.0	59.2	1.2	No
Locust Avenue (Moreno Beach Drive to Smiley Boulevard)	46.2	46.2	0.0	No
Locust Avenue (Moreno Beach Drive to Redlands Boulevard)	60.7	61.4	0.7	No
Moreno Beach Drive (John F Kennedy to Oliver Street)	56.1	58.2	2.1	No
Moreno Beach Drive (Locust Avenue to Ironwood Avenue)	58.8	59.3	0.5	No
Oliver Street (Alessandro Boulevard to Cactus Avenue)	58.9	59.1	0.2	No
Redlands Boulevard (Eucalyptus Avenue to Dracaea Avenue)	49.1	47.1	-2.0	No
Redlands Boulevard (Ironwood Avenue to SR-60)	69.2	70.7	1.5	No

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Table 4.12.I: Phase I (2022) Plus Project Traffic Noise Levels (dBA)

Roadway Segment	CNEL (dBA) at 100 feet			
	Without Project	With Project	Change	Substantial Increase?
Redlands Boulevard (Ironwood Avenue to San Timoteo Canyon Road)	69.1	70.5	1.4	No
Redlands Boulevard (SR-60 to Eucalyptus Avenue)	62.9	65.3	2.4	No
San Timoteo Canyon Road (Alessandro Road to Live Oak Canyon Road)	63.4	65.3	1.9	No
San Timoteo Canyon Road (Live Oak Canyon Road to Redlands Boulevard)	64.2	66.0	1.8	No
Street A (Eucalyptus Avenue to Street F)	52.5	72.1	19.6	Yes
Street D (Street E to Cactus Avenue)	0.0	68.0	68.0	Yes
Street E (north of Alessandro Boulevard)	0.0	65.9	65.9	Yes
Street F (east of Street A)	0.0	43.6	43.6	Yes
Sunset Drive (Alessandro Road to Cameo Drive)	55.3	56.3	1.0	No
Sunset Drive (Crown Street to Alessandro Road)	49.0	49.0	0.0	No
Theodore Street (SR-60 to Highland Boulevard)	60.7	63.8	3.1	Yes
Freeways				
SR-60 (Pigeon Pass Road/Frederick Street to Heacock Street)	67.2	67.9	0.7	No
SR-60 (Heacock Street to Perris Boulevard)	66.1	66.9	0.8	No
SR-60 (Perris Boulevard to Nason Street)	65.6	66.6	1.0	No
SR-60 (Nason Street to Moreno Beach Drive)	53.1	54.2	1.1	No
SR-60 (Moreno Beach Drive to Redlands Boulevard)	63.8	65.3	1.5	No
SR-60 (Redlands Boulevard to Theodore Street)	61.7	63.2	1.5	No

Source: Mestre Greve Associates, September 2014.

As identified in Table 4.12.I, implementation of the proposed WLC project would result in relatively minor changes in traffic noise levels in Year 2022 (Phase I). The largest project-related increase in traffic noise would be along Street D (Street E to Cactus Avenue) and Street E (north of Alessandro Boulevard), where increases of greater than 65 dBA are predicted for the 2022 With Project scenario over the Year 2022 without project scenario. The increase associated with these roadway segments is attributable in part to Streets D and E being new roads that will be constructed by the proposed project. A total of 7 road segments would result in a significant noise increase attributable to the project, resulting in a significant cumulative impact requiring mitigation.

Note: Table 4.12.J has been deleted in its entirety. Please refer to Final EIR Volume IV for the original Table 4.12.J, which can be found in section 4.12.6.2. Operation of the proposed project would generate traffic along roadways in the surrounding area during the buildout year (2035) scenario. Buildout Year (2035) with and without project scenarios projected daily traffic volumes on roadway segments in the project vicinity were used to conduct the traffic noise modeling. The projected daily traffic volumes in the area were taken from the TIA prepared for the proposed project. Table 4.12.J identifies the Buildout Year (2035) without project and with project traffic noise levels.

Note: Table 4.12.K (now table 4.12.J) has been replaced in its entirety. Please refer to Final EIR Volume IV for the original Table 4.12.K, which can be found in section 4.12.6.2.

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Table 4.12.J: Buildout Year (2035) Plus Project Traffic Noise Levels (dBA)

Roadway Segment	CNEL (dBA) at 100 feet			
	Without Project	With Project	Change	Substantial Increase?
Alessandro Road (Crescent Avenue to Sunset Drive)	64.6	65.4	0.9	No
Alessandro Road (Sunset Drive to San Timoteo Canyon Road)	65.0	66.0	1.0	No
Cactus Avenue (Oliver Street to Moreno Beach Drive)	60.5	62.0	1.5	No
Cactus Avenue (Redlands Boulevard to Street D)	55.1	69.2	14.1	Yes
Cactus Avenue (west of Redlands Boulevard.)	62.0	66.2	4.2	Yes
Crescent Avenue (west of Alessandro Boulevard)	58.9	60.1	1.2	No
Fir Avenue (Quincy Drive to Redlands Boulevard)	64.7	67.1	2.4	No
Gilman Springs Road (Bridge Street to Beaumont Avenue)	63.5	65.2	1.7	No
Gilman Springs Road (Bridge Street to SR-79 Southbound Ramps)	75.4	77.1	1.6	Yes
Gilman Springs Road (Eucalyptus Avenue to Street C)	55.2	57.6	2.4	No
Gilman Springs Road (Jack Rabbit Trail to Bridge Street)	65.8	67.6	1.8	Yes
Iris Avenue (Kitching Street to Lasselle Street)	63.2	64.1	0.9	No
Iris Avenue (Lasselle Street to Nason Street)	63.1	64.3	1.2	No
Iris Avenue (Nason Street to Oliver Street)	64.7	66.6	2.0	No
Ironwood Avenue (Redlands Boulevard to Highland Boulevard)	58.7	60.8	2.1	No
John F Kennedy Drive (south of Cactus Avenue)	64.5	67.5	3.0	Yes
Krameria Avenue (Perris Boulevard to Lasselle Street)	57.6	58.5	0.9	No
Lasselle Street (Krameria Avenue to Arroyo Park Drive)	60.0	61.0	0.9	No
Live Oak Canyon Road (North of San Timoteo Canyon Road)	64.9	65.9	1.0	No
Live Oak Canyon Road (San Timoteo Canyon Road to I-10)	57.5	59.0	1.5	No
Locust Avenue (Moreno Beach Drive to Smiley Boulevard)	65.4	66.9	1.5	Yes
Locust Avenue (Moreno Beach Drive to Redlands Boulevard)	60.9	62.9	2.0	No
Moreno Beach Drive (John F Kennedy to Oliver Street)	56.9	59.4	2.6	No
Moreno Beach Drive (Locust Avenue to Ironwood Avenue)	63.4	65.1	1.7	No
Oliver Street (Alessandro Boulevard to Cactus Avenue)	54.1	54.3	0.2	No
Redlands Boulevard (Eucalyptus Avenue to Dracaea Avenue)	46.5	48.1	1.6	No
Redlands Boulevard (Ironwood Avenue to SR-60)	69.5	71.0	1.5	Yes
Redlands Boulevard (Ironwood Avenue to San Timoteo Canyon Road)	68.8	70.9	2.1	Yes
Redlands Boulevard (SR-60 to Eucalyptus Avenue)	63.8	67.4	3.6	Yes
San Timoteo Canyon Road (Alessandro Road to Live Oak Canyon Road)	63.6	66.2	2.7	No
San Timoteo Canyon Road (Live Oak Canyon Road to Redlands Boulevard)	64.2	66.7	2.5	No
Street A (Eucalyptus Avenue to Street F)	57.2	73.1	16.0	Yes
Street D (Street E to Cactus Avenue)	0.0	70.6	70.6	Yes
Street E (north of Alessandro Boulevard)	0.0	65.7	65.7	Yes

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Table 4.12.J: Buildout Year (2035) Plus Project Traffic Noise Levels (dBA)

Roadway Segment	CNEL (dBA) at 100 feet			
	Without Project	With Project	Change	Substantial Increase?
Street F (east of Street A)	0.0	69.1	69.1	Yes
Sunset Drive (Alessandro Road to Cameo Drive)	57.0	58.2	1.2	No
Sunset Drive (Crown Street to Alessandro Road)	50.7	51.3	0.6	No
Theodore Street (SR-60 to Highland Boulevard)	65.2	66.3	1.2	No
Freeways				
SR-60 (Pigeon Pass Road/Frederick Street to Heacock Street)	67.6	68.6	1.0	No
SR-60 (Heacock Street to Perris Boulevard)	66.6	67.7	1.1	No
SR-60 (Perris Boulevard to Nason Street)	66.5	67.8	1.3	No
SR-60 (Nason Street to Moreno Beach Drive)	54.3	55.6	1.3	No
SR-60 (Moreno Beach Drive to Redlands Boulevard)	65.5	67.1	1.6	Yes
SR-60 (Redlands Boulevard to Theodore Street)	63.7	65.1	1.4	No

Source: Mestre Greve Associates, September 2014.

Increases in noise levels associated with Buildout Year (2035) traffic conditions on area roadways range from 0.1 to 68.0 dBA. As identified in the Table 4.12.J, the greatest increase in noise levels would be along Street D (Street E to Cactus Avenue), Street E (north of Alessandro Boulevard), and Street F west (of Street A), where increases of greater than 65 dBA are predicted for the Buildout Year 2035 With Project scenario over the Buildout Year 2035 Without Project scenario. The increase associated with these roadway segments is attributable in part to Streets D, E, and F being new roads that will be constructed by the proposed project.

Note: A total of 14 road or freeway segments would result in a significant noise increase attributable to the project, resulting in a significant cumulative impact requiring mitigation. These 14 segments were included in the original noise study, and all other impacts identified in the original noise study are unchanged except as noted below.

Tables 4.12.H through 4.12.J identify the noise increases directly caused by the proposed project. These numbers represent the distance from the centerline of the road to the contour value shown. Note that the values given in Tables 4.12.H through 4.12.J do not take into account the effect of any existing noise attenuation in the form of barriers, soundwalls, or topography that may affect ambient noise levels.

For the reader's convenience, the significance threshold for a project-specific roadway noise impact as defined previously is:

- Project induced increase in noise levels by 5 dB or more where the no project noise level is less than 60 CNEL;
- Project induced increase in noise level by 3 dB or more where the no project noise level is 60 CNEL to 65 CNEL; or
- Project induced increase in noise levels by 1.5 dB or more where the no project noise level is greater than 65 CNEL.

For the reader's convenience, the significance threshold for a project's incremental contribution to a cumulative noise increase as defined previously is:

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- A project increase of the ambient (cumulative without project) noise level by 1 dB or more, and the predicted future cumulative with project noise levels cause the following cumulative increases:
 - Increase noise levels by 5 dB or more where the existing noise level is less than 60 CNEL;
 - Increase noise levels by 3 dB or more where the existing noise level is 60 to 65 CNEL; or
 - Increase noise levels by 1.5 dB or more where the existing noise level is greater than 65 CNEL.

It should be noted that the same noise increase occurs at all locations along a roadway link. In addition, the noise contours cover a wider area around the local roadways than does the existing condition. State Route 60, however, continues to be the dominant noise source in the area.

In general, the project proposes logistics uses and will not be affected by these noise increases. However, there are a few scattered residences within the project area and adjacent to the WLCSP area that would be affected by the proposed logistics uses.

Within the Specific Plan Area. Existing noise-sensitive uses within the WLCSP area include three groups of residences that may remain with the implementation of the proposed project. The Specific Plan would rezone the properties as Light Logistics, but it is anticipated that the residences may remain for some time. The Light Logistics use is not sensitive to noise. However, the existing residences, as long as they remain, must be considered sensitive land uses.

- *Redlands Boulevard (north of Brodiaea Avenue).* The first group of homes is located east of Redlands Boulevard north of the intersection with Brodiaea Avenue. The traffic on Redlands Boulevard will not increase significantly as a result of the project. Future Street E is proposed to be constructed west of these existing residences. However, as stated in the Noise Study conducted for the Specific Plan, it is likely that there will be intervening buildings and that the distance from Street E will be so great that these homes will not experience significant noise from public roadways. Therefore, impacts are anticipated to be less than significant and no mitigation is required.
- *Street A/Theodore Street (Street B to Street F).* The second group of residences within the Specific Plan area is located on the east side of Street A (Theodore Street) midway between the future Street B and Street F. There are currently two residences in this area. These residences are anticipated to experience noise increases up to 16 dB due to the implementation of the Specific Plan. As a result, existing noise levels at these two residences will be changed significantly. The exact alignment of the roadway is yet to be determined, but the homes may be roughly 100 feet from the centerline on the roadway. As identified in Table 4.12.J, at this distance, the noise level by future year (2035) could be as high as 73.1 CNEL. This level of noise would be above the 65 CNEL threshold and would result in a greater than 1.5 dB noise increase when compared to without project conditions. This is a significant impact requiring mitigation.
- *Street F/Dracaea Avenue (east of Theodore Street).* The third area is a single residence located east of Theodore Street along what is currently Dracaea Avenue (future Street F). Existing conditions identify low levels of traffic noise on Dracaea Avenue. With build out of the project, noise levels would reach as high as 68.1 CNEL. This level of noise would be above the 65 CNEL threshold and result in a greater than 1.5 dB noise increase when compared to without project conditions. Therefore, this is a significant impact requiring mitigation.

Off-Site Areas Adjacent to the Specific Plan Area. For areas adjacent to the Specific Plan area, 18 segments would experience a noise increase that would be greater than significance criteria specified previously. These seven areas are described below.

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- *Cactus Avenue (Redlands Boulevard to Street D)*. This area is occupied by a small group of single-family homes along Cactus Avenue between the future Street D and Redlands Boulevard. A significant noise increase is projected for all time horizons. Currently, there is no soundwall along these homes. Therefore, this is a significant impact requiring mitigation.
- *Cactus Avenue (west of Redlands Boulevard)*. As identified in the noise study, this area shows noise increases ranging from 0.7 dB to 4.2 dB depending on the time horizon. Only the 2035 case results in a significant noise increase.

Existing residences are located along Redlands Boulevard with rear yards facing Cactus Avenue. Existing 6-foot high soundwalls are located along the residences and rear yard areas are approximately 60 feet from the centerline of the roadway. In buildout year (2035), the noise levels projected for the yard area including the effects of the soundwall are projected to be 66.2 CNEL. This is above the City criteria of 65 CNEL, resulting in a significant impact and mitigation is required.

- *Gilman Springs Road (between Eucalyptus Avenue and Street C, between Jack Rabbit Trail and Bridge Street, and between Bridge Street and SR-79 SB Ramps)*. There are three single-family homes scattered along these roadway segments. All of the houses are set back from the roadway, but none has soundwalls. A significant noise increase is projected for at least one of these segments in all time horizons. Therefore, this is a significant impact requiring mitigation.
- *Ironwood Avenue (between Redlands Boulevard and Highland Boulevard)*. There are two single-family homes that front onto Ironwood Avenue. There are also two churches along this roadway. A significant noise increase is projected for 2012 with full project build out. Therefore, this is a significant impact requiring mitigation.
- *John F. Kennedy Drive (south of Cactus Avenue)*. The residences along John F. Kennedy Drive south of Cactus Avenue will experience significant noise increases in all four time horizons. Similar to the area along Cactus Avenue, this noise increase will be due to cars and light vehicles, and not heavy trucks. The residences along the west side of the roadway are generally depressed with respect to the road and have existing 6-foot soundwalls. Due to the presence of the existing soundwalls and slope conditions, noise levels would be reduced by 6 to 10 dB. This would result in noise levels being below the City threshold of 65 CNEL for residential uses. Therefore, residences on the west side of the street will not be affected. Impacts are considered to be less than significant and no mitigation is required.

The residences on the east side of the roadway are elevated with respect to the roadway and do not have soundwalls. Rear yards areas on both sides of the street are approximately 60 to 90 feet from the centerline of the roadway and are bordered by wrought iron fencing. As identified in Tables 4.12.H through 4.12.J, the greatest noise levels that would be experienced at these residences would range up to 67.5 CNEL, which is above the City threshold of 65 CNEL. This is a significant impact requiring mitigation.

- *Locust Avenue (between Moreno Beach Drive and Smiley Boulevard)*. There are three single-family homes along this roadway and they front onto the roadway. The 2035 time horizon results in a significant noise increase for this area. In 2035, the project will increase noise levels by 1.5 dB, bringing the noise level to 66.9 CNEL. This is a significant impact requiring mitigation.
- *Redlands Boulevard (from Eucalyptus Avenue to State Route 60)*. There are scattered homes in this area that either face Redlands Boulevard (or Shubert Street) or are on Redlands Boulevard. The 2012 and 2035 time horizons result in a significant noise increase for this area. This is a significant impact requiring mitigation.
- *Redlands Boulevard (from Ironwood Avenue to State Route 60 and Ironwood Avenue to San Timoteo Canyon Road)*. There are approximately 28 homes along this roadway that would be affected. The single-family homes are scattered and generally front the roadway. All time horizons result in a significant noise increase for this area. The increases in noise are around 2

dB with a resultant noise level in the 70 to 71 CNEL range. This is a significant impact requiring mitigation.

- *San Timoteo Canyon Road (from Alessandro Road to Live Oak Canyon Road to Redlands Boulevard)*. There are about four scattered residences along this roadway that would be affected. The existing baseline plus project time horizon results in a significant noise increase for this area. The noise increases by up to 3.1 dB with resultant noise levels in the 65 to 66 CNEL range. This is a significant impact requiring mitigation.
- *Theodore Street (State Route 60 to Highland Boulevard)*. There are four existing homes on Theodore Street that front onto the roadway. Implementation of the Specific Plan would result in a 7.1 dB increase over baseline conditions (2012), and a 3.1 dB increase in Opening Year (2022). By Buildout Year (2035), the noise increase associated with the proposed project is anticipated to be 1.2 dB, which would not be significant. These existing residences could experience noise levels of 65.0 CNEL in the baseline and 66.3 CNEL in the Year 2035 time horizons which is above the City threshold of 65 CNEL. This is a significant impact requiring mitigation.
- *Street A from Eucalyptus Avenue to Street F; Street E north of Alessandro Boulevard; and Street F east of Street A (2, 4, 19)*. There are three groups of homes that may remain within the project area. The analysis shows significant noise increases for all four cases. The proposed Specific Plan designates these properties for Light Logistics uses, but the residences may remain indefinitely. The future Light Logistics use is not sensitive to noise. However, the existing residences, as long as they remain as a non-conforming use, must be considered as a sensitive land use. The first group of homes is east of Redlands Boulevard north of the intersection with Brodiaea Avenue. Street E will be constructed west of these homes. It is likely that there will be intervening buildings and that the distance from Street E will be so great that these homes will not experience significant noise from public roadways.

The second group of homes is on the east side of Street A (Theodore Street) midway between the future Street B and Street F. There are two homes in this area. Their noise environment will be changed significantly. The exact alignment of the roadway is to be determined, but noise levels could exceed 70 CNEL at the residences. The noise levels at these homes would be unacceptable to the residents, and a significant impact would occur.

The third area is a single home and lies east of Street A and along Street F. Currently there is essentially no traffic on this street. There is one residence in this area. Depending on the alignment for the street noise levels could exceed 70 CNEL. Since this home will experience a substantial noise increase, this is considered a significant impact.

It should be noted these homes were evaluated in the original DEIR and their impacts were disclosed on DEIR page 4.12-47.

- *Cactus Avenue Extension (from Street E to Cactus Avenue)*. Cactus Avenue Extension, as shown in the Specific Plan, will come down the western side of the project parallel to Merwin Street. It then merges with Cactus Avenue traveling to the west until Redlands Boulevard. A specific alignment has not been determined for this roadway. There are approximately 14 homes that side-on to Merwin Street that could be affected by traffic on Cactus Avenue Extension. There are no soundwalls along these homes. There would be limited or no heavy trucks using this roadway. The 65 CNEL contour will lie 114 feet from the centerline of Cactus Avenue Extension. If the centerline of Cactus Avenue Extension is located closer than 114 feet to the residences, then a significant impact would occur. Outdoor living spaces for homes along Merwin Street would experience noise levels greater than 65 CNEL, and this would not be consistent with City criteria. This is a significant impact requiring mitigation.
- *State Route 60 (from Pigeon Pass Road to Perris Boulevard)*. All residential areas along this stretch of freeway have soundwalls in place. The 2012 time horizon results in a significant noise increase for this area. The noise levels are projected to increase by 1.5 to 1.7 dB in this area with

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resultant noise levels in the 66.9 to 68.0 CNEL range. This is a significant impact requiring mitigation.

- *State Route 60 (from Moreno Beach Drive to Redlands Boulevard)*. There are soundwalls in place for all residences in this area. The existing 2012 and 2035 time horizons result in a significant noise increase for this area, reaching 67.1 CNEL by 2035. This is a significant impact requiring mitigation.
- *State Route 60 (from Redlands Boulevard to Theodore Street)*. No soundwalls are present in this area. The residential area is set back from the freeway and is clustered along Redlands Boulevard north of the freeway. The existing 2012 time horizon results in a significant noise increase for this area. The resultant noise level will be 63.5 CNEL with an increase due to the project of 3.4 dB. This is a significant impact requiring mitigation.

Specific Plan Design Features. The WLCSP indicates there will be a 250-foot setback from existing housing along Redlands Boulevard. No additional design features to attenuate noise impacts are planned as part of the WLCSP.

Note: Due to changes in the Specific Plan, Project Traffic Impact Assessment, Project Noise Study, and in response to comments in Letter C-4-2 and F-13-9 and F-13-84, the following mitigation measures have been revised.

Mitigation Measures. Construction of the proposed WLC project would result in noise levels at the closest residences within and adjacent to the WLCSP area exceeding the maximum noise level allowed under the City's Municipal Code. The following measures would reduce long-term traffic related noise impacts associated with the proposed project:

4.12.6.2A When processing future individual buildings under the World Logistics Center Specific Plan, as part of the City's approval process, the City shall require the Applicant to take the following three actions for each building prior to approval of discretionary permits for individual plot plans for the requested development:

Action 1: Perform a building-specific noise study to ensure that the assumptions set forth in the FEIR prepared for the programmatic level entitlement remain valid. These procedure used to conduct these noise analyses shall be consistent with the noise analysis conducted in the programmatic FEIR and shall be used to impose building-specific mitigation on the individually-proposed buildings.

Action 2: If the building-specific analyses identify that the proposed development triggers the need for mitigation from the proposed building, including all preceding developments in the specific plan area, the Applicant shall implement the mitigation identified in the WLC FEIR. Prior to implementing the mitigation, the Applicant shall send letters by registered mail to all property owners and non-owner occupants of properties that would benefit from the proposed mitigation asking them to provide a position either in favor of or in opposition to the proposed noise abatement mitigation within 45 days. Each property shall be entitled to one vote on behalf of owners and one vote per dwelling on behalf of non-owner occupants.

If more than 50% of the votes from responding benefited receptors oppose the abatement, the abatement will not be considered reasonable. Additionally, for noise abatement to be located on private property, 100% of owners of property upon which the abatement is to be placed must support the proposed abatement. In the case of proposed noise abatement on private property, no response from a property owner, after three attempts by registered mail, is considered a *no* vote.

At the completion of the vote at the end of the 45 day period, the Applicant shall provide the tentative results of the vote to all property owners by registered mail. During the next 15 calendar days following the date of the mailing, property owners may change their vote. Following the 15-day period, the results of the vote will be finalized and made public.

Action 3: Upon consent from benefited receptors and property owners, the Applicant shall post a bond for the cost of the construction of the necessary mitigation as estimated by the City Engineer to ensure completion of the mitigation. The certificate of occupancy permits shall be issued upon posting of the bond or demonstration that 50% of the votes from responding benefited receptors oppose the abatement or, if the abatement is located on private property, any property owners oppose the abatement (per Noise Study MM N-8, pg.53).

- 4.12.6.2B** Prior to issuance/approval of any building permits, the centerline of Cactus Avenue Extension will be located no closer than 114 feet to the residential property lines along Merwin Street. An alternative is to locate the roadway closer to the residences and provide a soundwall along Cactus Avenue Extension. The soundwall location and height should be determined by a Registered Engineer, and the soundwall shall be designed to reduce noise levels to less than 65 CNEL at the residences. The Engineer shall provide calculations and supporting information in a report that will be required to be submitted to and approved by the City prior to issuing permits to construct the road (per Noise Study, pg. 51, Cactus Avenue Extension, ID #50).
- 4.12.6.2C** Prior to the approval of any discretionary permits, cumulative impact areas shown in the WLC EIR Noise Study shall be included in the soundwall mitigation program outlined in Mitigation Measures 4.12.6.2A and 4.12.6.2D (per Noise Study MM N-9, pg. 62).
- 4.12.6.2D** Prior to issuance of a building permit, the applicant shall demonstrate that the development maintains a buffer with soundwall for noise attenuation at residential/warehousing interface (i.e., western and southwestern boundaries of the project site). To keep the noise levels at nearby residential areas less than typical ambient conditions, the warehousing property line shall be located a minimum of 250 feet from the residential zone boundary, and a 12-foot noise barrier shall be located along the perimeter of the property that faces any residential areas. The 12 foot noise barrier may be a soundwall, berm, or combination of the two. The height shall be measured relative to the pad of the warehouse. This requirement shall be implemented anytime residential areas are within 600 feet of the warehousing property line to insure that a noise level of 45 dBA (Leq) will not be exceeded at the residential zone. This requirement is consistent with Item 10 of Municipal Code Section 9.16.160 Business park/industrial that states, "All manufacturing and industrial uses adjacent to residential land uses shall include a buffer zone and/or noise attenuation wall to reduce outside noise levels" (per Noise Study MM N-10, pg.62).

Level of Significance after Mitigation. *Within the WLC Specific Plan Area.* For areas within the WLCSP area, three groups of residences may exceed the noise standard with the implementation of the proposed project. The level of significance after mitigation is provided for each of the two areas for which a significant impact has been identified.

- *Redlands Boulevard (north of Brodiaea Avenue).* A group of homes is located east of Redlands Boulevard north of the intersection with Brodiaea Avenue. The traffic on Redlands Boulevard will not increase significantly as a result of the project. Future Street E is proposed to be constructed west of these existing residences. It is likely that there will be intervening buildings and that the distance from Street E will be so great that these homes will not experience significant noise from

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public roadways. Therefore, impacts are anticipated to be less than significant and no mitigation is required.

- *Theodore Street/Street A (Street B to Street F)*. There are two residences in this area. These residences are anticipated to experience noise increases up to 16 dB due to the implementation of the Specific Plan. As a result, existing noise levels at these two residences will be changed significantly. The exact alignment of the roadway is to be determined, but the homes may be roughly 100 feet from the centerline on the roadway. One residence fronts onto Street A (Theodore Street), and the driveway access would make a soundwall ineffective. The other residence is on to Street A. It is difficult to determine where an outdoor living area is for this residence. However, since it is a single residence, a soundwall would have a limited effectiveness. Since mitigation is not feasible, impacts remain significant and unavoidable.
- *Dracaea Avenue/Street F (east of Theodore Street)*. There is one residence in this area fronting onto the future alignment of Street F (currently Dracaea Avenue). Existing conditions identify low levels of traffic noise on Dracaea Avenue. The 65 CNEL contour is projected to lie 84 feet from the centerline of Street F and it is likely that the one residence would lie within this zone. With build out of the project, noise levels would reach as high as 68.1 CNEL, which exceeds the City's 65 CNEL threshold. Installation of a soundwall would not be effective in reducing noise levels due to the opening for the driveway. Since mitigation is not feasible, impacts remain significant and unavoidable.

Off-Site Areas Adjacent to the Specific Plan Area. For areas adjacent to the WLCSP area, seven areas would experience noise increases that would be mitigated to a less than significant level with implementation of **Mitigation Measures 4.12.6.2A** and **4.12.6.2D**. These areas are as follows:

- Cactus Avenue west of Redlands Boulevard;
 - Cactus Avenue from Redlands Boulevard to Street D;
 - John F. Kennedy Drive, south of Cactus Avenue;
 - Moreno Beach Drive between Locust Avenue and Ironwood Avenue (15 of 18 homes);
 - State Route 60 from Redlands Boulevard to Theodore Street;
 - Iris Avenue from Nason Street to Oliver Street; and
 - Street D from Street E to Cactus Avenue (8).
- For the remaining noise impact locations adjacent to the WLCSP area for which significant noise impacts have been identified, mitigation measures are not feasible or will not fully reduce the impact to less than significant levels. Each location that will remain significant and unavoidable with *Gilman Springs Road (between Eucalyptus Avenue and Street C, and between Jack Rabbit Trail and Bridge Street)*. There are three single-family homes scattered along these roadway segments. All of the houses are set back from the roadway, but none has soundwalls. A significant noise increase is projected for at least one of these segments in three of the four case years. Homes that are widely separated from other homes cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
 - *Ironwood Avenue (between Redlands Boulevard and Highland Boulevard)*. There are two single-family homes that front onto Ironwood Avenue. There are also two churches along this roadway. A significant noise increase is projected for the 2012 time horizon. In 2035, the project is projected to increase noise levels by 2.1 dB, bringing the noise level to 60.8 CNEL. Land uses that are widely separated from one another cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.

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- *Locust Avenue (between Moreno Beach Drive and Smiley Boulevard)*. There are three single-family homes along this roadway and they front onto the roadway. The 2035 time horizon results in a significant noise increase for this area. In 2035, the project will increase noise levels by 1.5 dB, bringing the noise level to 66.9 CNEL. As discussed above, homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *Redlands Boulevard (Eucalyptus Avenue to State Route 60)*. There are scattered homes in this area that either face Redlands Boulevard (or Shubert Street) or are on Redlands Boulevard. The 2012 and 2035 time horizons result in a significant noise increase for this area. Homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *Redlands Boulevard (State Route 60 to San Timoteo Canyon Road)*. There are approximately 28 homes along this roadway that would be affected. The single-family homes are scattered and generally front the roadway. The 2012, 2022, and 2035 time horizons result in a significant noise increase for this area. The increases in noise are around 2 dB with a resultant noise level in the 70 to 71 CNEL range. Homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *San Timoteo Canyon Road (from Alessandro Road to Live Oak Canyon Road to Redlands Boulevard)*. There are approximately four scattered residences along this roadway that would be affected. The existing baseline plus project time horizon results in a significant noise increase for this area. The noise increases by a little over 3.0 dB with resultant noise levels in the 65 to 66 CNEL range. Homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *Theodore Street (State Route 60 to Highland Boulevard)*. The noise analysis indicates that the project will cause a 1.2 dB increase in the year 2035 with a resulting noise level of 66.3 CNEL. There are four existing homes on Theodore Street that front onto the roadway. Homes that are scattered and front onto a street cannot be effectively mitigated with a soundwall. Therefore, the significant impact cannot be feasibly mitigated and it will remain significant and unavoidable.
- *Street A from Eucalyptus Avenue to Street F; Street E north of Alessandro Boulevard; and Street F east of Street A (2, 4, 19)*. There are three groups of homes that may remain within the project area. The analysis shows significant noise increases for all four cases. The project would rezone these residences as Light Logistics, but the residences may remain for some time. The Light Logistics use is not sensitive to noise. However, the existing residences, as long as they remain, must be considered as a sensitive land use. The first homes are east of Redlands Boulevard north of the intersection with Brodiaea Avenue. Street E will be constructed west of these homes. It is likely that there will be intervening buildings and that the distance from Street E will be so great that these homes will not experience significant noise from public roadways.

The second group of homes is on the east side of Street A (Theodore Street) midway between the future Street B and Street F. There are two homes in this area. Their noise environment will be changed significantly. The exact alignment of the roadway is to be determined. The noise levels at these homes would be unacceptable to the residents, and a significant impact would occur. As discussed above homes, that front onto a street or scattered homes cannot be effectively mitigated with a soundwall. Therefore, there is no feasible mitigation and this impact would remain significant and unavoidable.

The third area is a single home and lies east of Street A and along Street F. Currently there is essentially no traffic on this street. There is one residence in this area. Since this home will experience a substantial noise increase, this is considered a significant impact. All of these homes will either front onto the roadway or are scattered. As discussed above homes, that front

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onto a street or scattered homes cannot be effectively mitigated with a soundwall. Therefore, there is no feasible mitigation and this impact would remain significant and unavoidable.

- *Cactus Avenue Extension (Street D) from Street E to Cactus Avenue.* Cactus Avenue Extension, as shown in the Specific Plan, will come down the western side of the project parallel to Merwin Street and roughly 1,250 feet from Merwin Street. It then merges with Cactus Avenue traveling to the west until Redlands Boulevard. A specific alignment has not been determined for this roadway. There would be essentially no heavy trucks using this roadway. There are approximately 14 homes that side-on to Merwin Street that could be affected by traffic on Cactus Avenue Extension. There are no soundwalls along these homes. The noise forecast shows that the 65 CNEL contour will lie 114 feet from the centerline of Cactus Avenue Extension. If the centerline of Cactus Avenue Extension is located closer than 114 feet to the residences, then a significant impact would occur. Outdoor living spaces for homes along Merwin Street would experience noise levels greater than 65 CNEL, and this would not be consistent with City criteria. Due to the distance from the currently envisioned between Merwin Street and Cactus Avenue Extension, it is most likely that no soundwall will be needed. If a soundwall was needed, a preliminary estimate indicates that the soundwall along Cactus Avenue Extension would need to be roughly 2,000 feet.

4.12.6.3 Long-Term Operational Noise Impacts

Threshold	Would the project cause exposure of persons to or generation of noise levels in excess of standards established in the <i>City of Moreno Valley General Plan, Moreno Valley Municipal Code</i> , or applicable standards of other agencies?
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Potential long-term stationary noise impacts would primarily be associated with operations at logistics facilities within the WLCSP area. Logistics facility uses would generate noise from truck delivery, loading/unloading activities at the loading areas, heating, ventilation, and air-conditioning (HVAC) equipment and other noise-producing activities within the parking lot (e.g., doors slamming, vehicle engine start-ups, and conversing in the parking lot). These activities are potential point sources of noise that could affect noise-sensitive receptors adjacent to the loading areas and parking lots. As noise spreads from a source, it loses energy; therefore, the farther away the noise receiver is from the noise source, the lower the perceived noise level would be.

Noise levels were measured at similar facilities to determine representative noise levels that might be generated by this type of activity. Noise measurements were made at two facilities; specifically, Lowes Distribution Center (3984 Indian Avenue, Perris, CA) and Ross Distribution Center (3404 Indian Avenue, Perris, CA). Based on these representative noise measurements, Table 4.12.K provides the noise levels for various distances from the warehouse property line with no noise barrier in place and with an assumed 12-foot noise barrier.

Table 4.12.K: Representative Noise Levels for Warehousing Activities

Distance from Facility (feet)	Noise Level (dBA L _{eq})	
	No Barrier	With 12-foot barrier
50	56.9	48.6
100	54.9	47.8
250	50.8	44.7
500	46.6	40.9

Source: Mestre Greve Associates, September 2014.

The City of Moreno Valley Noise Ordinance requires that noise levels remain below 55 dBA (L_{eq}) during nighttime hours. To achieve this noise level, the warehouse property line would only need to be 100 feet from the nearest residential property and no soundwall would need to be present.

Another consideration is whether the proposed activity levels will be substantially higher than current ambient conditions. No matter what is developed in the Specific Plan area, ambient conditions would be higher in future years due to higher levels of traffic and activity. Ambient noise levels were measured at seven sites that could border the World Logistics Center (i.e., Measurement Sites 3 through 9). The nighttime ambient noise levels (L_{eq}) ranged from 35.8 to 61.8 dBA with an average for the sites of 46.6 dBA. To keep the noise levels at nearby residential areas less than typical ambient conditions, the logistics property line should be located a minimum distance of 250 feet and a 12-foot soundwall should be located along the perimeter of the property that faces any residential areas. This would keep the logistic use noise to less than 45 dBA (L_{eq}) at the residences. The implementation of this buffer between logistics uses and noise sensitive uses has been included as **Mitigation Measure 4.1.6.1A**.

Specific Plan Design Features. The WLCSP indicates there will be a 250-foot building setback from residentially zoned property along Redlands Boulevard, Bay Avenue, and Merwin Street.

Level of Significance after Mitigation. Implementation of **Mitigation Measure 4.1.6.1A** would eliminate any noise impacts on residential areas due to the operation of logistic activities. Through the provision of a 250-foot buffer, berms, and/or soundwalls, noise levels at the nearest residences would be reduced to below the City’s thresholds. Therefore, with adherence to the identified mitigation measure, impacts associated with this issue would be less than significant.

4.12.6.4 Long-Term Utility Noise Impacts

Threshold	Would the project cause exposure of persons to or generation of noise levels in excess of standards established in the <i>City of Moreno Valley General Plan</i> , <i>Moreno Valley Municipal Code</i> , or applicable standards of other agencies?
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As illustrated in previously referenced Figure 4.12.3 and Figure 4.12.6, there is one existing SDG&E compressor station and two existing SCGC facilities located within the WLC Specific Plan area.

Based on preliminary calculations as illustrated in Figure 4.12.3, the worst-case compressor station operational characteristics will result in a maximum noise level just above 65 CNEL within the project area proposed for development (i.e., not open space). Typical commercial construction results in buildings that achieve at least a 20 dB reduction of outdoor noise levels. Therefore, an office use exposed to the highest noise level from the compressor station will be just above 45 CNEL and below the 50 CNEL limit prescribed by the City’s General Plan, resulting in a less than significant impact and no mitigation is required.

As illustrated in previously referenced Figure 4.12.4, the L_{eq} noise level generated by the compressor station does not exceed 60 dBA L_{eq} beyond the property lines of the facility. Therefore, the compressor station is not considered a noise disturbance based on City criteria. Operation of the compressor station would not result in any interior noise levels exceeding the limits established by the City in the General Plan. Therefore, noise impacts associated with the operation of the compressor station would be less than significant and no mitigation is required.

As identified in previously referenced Figure 4.12.5, the maximum noise level from a blow-down at the SDG&E compressor station within the WLCSP area proposed for development (i.e., the Logistics

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Development land use) is 100 dBA. A person would need to be exposed to this level for more than two hours in a day before permanent hearing loss would be expected. As discussed above, blow-down events at the SDG&E compressor station typically do not last longer than 90 seconds. Therefore, the SDG&E blow-down events will not result in a significant impact to the uses proposed within the WLCSP area, and no mitigation is required.

For SCGC blow-down events, noise generated could reach as high as 130 dBA just outside the fence line of the southern facility and in excess of 135 dB just outside the fence line of the northern facility. People within approximately 250 feet of the blow-down points would be exposed to noise levels greater than 115 dBA, which would likely cause permanent hearing damage regardless of the exposure time. The SCGC blow-downs could last as long as 90 minutes. It is anticipated that people exposed to noise levels greater than 102 dBA, within approximately 1,300 feet from the blow-down point could experience permanent hearing loss based on this event duration. Noise generated by SCGC blow-down events has the potential to cause permanent hearing loss in persons in the developed area of the project. This is a significant impact and mitigation is required.

SCGC blow-down events also have the potential to produce groundborne vibration. However, the effect of the blow-down groundborne vibration would be limited to within 100 feet of the equipment and would not be perceived beyond the facility fenceline, resulting in a less than significant impact and no mitigation is required.

Specific Plan Design Features. The WLCSP provides a setback of open space and a street between the SCGC facility and planned warehouse buildings in the WLCSP. However, the separation may not be sufficient to prevent significant noise impacts during blow-down events. According to the project noise assessment, a 40 dB reduction in existing noise levels from the blow-down facilities would be needed to ensure there would be no significant noise impacts on workers or other persons within 1,300 feet of the blow-down facilities (FEIR Volume 2 Appendix K).

Note: The changes to the following mitigation measure have been made in response to Comment C-4-2 in Letter C-4 from Semper Energy, and the revised noise study.

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

4.12.6.4A Prior to the issuance of building permits for projects within 1,300 feet of the Southern California Gas Company (SCGC) and San Diego Gas and Electric (SDG&E) blow-down facilities, documentation shall be submitted to the City confirming that sound attenuation devices and/or improvements for the blow-down facilities providing at least a 40 dB reduction in noise levels during blow-down events are available and will be installed for all planned blow-down events. It shall be the responsibility of the developer to fund all sound attenuation improvements to the blow-down facilities required by this measure. It shall also be the responsibility of the developer to coordinate with San Diego Gas and Electric and/or Southern California Gas Company regarding the installation of any sound attenuation devices or improvements on the blow-down facilities at either the San Diego Gas and Electric compressor station or the Southern California Gas Company pipelines. This measure shall be implemented to the satisfaction of the City Land Management Division (per Noise Study MM N-11, pg.65).

Level of Significance after Mitigation. The SCGC blow-down equipment does not currently include a permanent silencer system. A review of the literature of a leading manufacturer of specialty silencer

systems (Industrial Acoustics Company) determined that a specialty silencer system added to the blow-down equipment could reduce noise levels by about 40 dB. With a silencer system providing 40 dB of noise reduction, blow-down noise levels would be less than 102 dBA approximately 30 feet from the blow-down point, which is within the property line of these facilities. 102 dBA is the noise level that could be experienced for up to 90 minutes without causing permanent hearing loss. Therefore, while occupants within the WLCSP in close proximity to the SCGC facilities would be subject to high noise levels during these infrequent noise events, they would not be subject to any permanent hearing damage. With implementation of **Mitigation Measure 4.12.6.4A**, SCGC blow-down events would not result in noise levels that could cause permanent hearing loss and the project would not be significantly affected by noise from the SCGC facilities, resulting in a less than significant impact.

4.12.7 Cumulative Impacts

The cumulative area for noise impacts is the City of Moreno Valley. Implementation of the Specific Plan would result in the introduction of new noise sources and levels from on-site activities and from increased traffic volumes on vicinity roadway and freeways.

Construction crew commutes and the transport of construction equipment, and materials to the WLCSP area would incrementally increase noise levels on access roads leading to the site. Secondary sources of noise would include noise generated during excavation, grading, and building erection on the project site. The net increase in project site noise levels generated by these activities and other sources has been quantitatively estimated and compared to the applicable noise standards and thresholds of significance. Although it is not possible to predict if contiguous properties may be constructed at the same time and create cumulative noise impacts that would be greater than if developed at separate times, it is unlikely that adjacent properties will be developed at the same time as the Specific Plan area. However, in the unlikely event that adjacent properties are developed at the same time as the proposed WLC project, adherence to the City's Municipal Code provisions that regulate construction activities and other development standards would render the cumulative impacts of the proposed project to less than significant levels.

The noise analysis contained in this section also provides an assessment of on-site operational noise level impacts on adjacent sensitive uses, both existing and future. Additionally, on-site operational noises are individual noise occurrences and are not typically additive in nature. It is extremely unlikely that adjacent properties will generate noises that would be additive in nature because of two important reasons. First, the noise sources would have to be adjacent or in close proximity to one another in order for the noises to intermingle. Second, the sensitive receptor or receptors would also have to be adjacent to or in close proximity to the noise generators. Although it is not possible to predict if contiguous or proximate properties may generate noise at the same time that would be additive in nature and thus create a significant cumulative noise impact at sensitive receptors, adherence to the City's Municipal Code provisions that regulate nuisance noise from land uses and other development standards would render the cumulative impacts of the proposed project to less than significant levels.

Cumulative traffic volumes contained in the TIA were developed for the Future Year 2022 and Buildout 2035 analysis time horizons. Traffic volumes for each time horizon were developed utilizing a combination of various future traffic growth methods as follows. For Future Year 2022, traffic volumes were developed by interpolating year 2035 traffic volume projections from the Riverside County Transportation and Analysis Model (RivTAM) to year 2022 plus traffic from a list of past, present, and reasonably foreseeable projects. For Buildout Year 2035, traffic volumes were developed by utilizing the year 2035 traffic volume projections from the RivTAM plus traffic from a list of past, present, and reasonably foreseeable projects.

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Cumulative noise impacts associated with roadway noise have been addressed based on the cumulative traffic volumes. Previously referenced Table 4.12.J provides a comparison of Buildout Year (2035) without and with project noise levels, and if a significant impact (project-specific or cumulatively significant) occurs.

The project calls for improvements to several of the roadways around the project area in order to accommodate the projected increase in project traffic volumes. There are no new noise-sensitive land uses proposed to be constructed within the area of analysis. However the presence of residential uses occurs within the WLCSP project and nearby area. These roadway segments are analyzed against the thresholds for determining significant impacts defined previously in Section 4.12.6.2. As described previously in Section 4.12.4, the project's incremental contribution to a cumulative noise increase would be considered cumulatively considerable and significant when ambient noise levels affect noise-sensitive land uses and when the proposed project increases noise levels by 1 dB or more over pre-project conditions and the predicted future cumulative with project noise levels cause the following cumulative increases:

- Increase noise levels by 5 dB or more where the existing noise level is less than 60 CNEL;
- Increase noise levels by 3 dB or more where the existing noise level is 60 to 65 CNEL; or
- Increase noise levels by 1.5 dB or more where the existing noise level is greater than 65 CNEL.

Cumulative noise impacts associated with roadway noise have been addressed based on the 2022 and 2035 time horizons analyses contained in Section 4.12.6.2. As identified in the preceding analysis, Table 4.12.J shows the Buildout Year 2035 CNEL values without and with the proposed project and if a significant impact would be produced based on the project-specific significance criteria identified in Section 4.12.4 and the cumulatively significant significance criteria identified in Section 4.12.4 and repeated above. Traffic noise level increases from the existing baseline condition and the future (2022 and 2035) time horizons are attributable to the intermingled effects of both the cumulative (i.e., past, present, and reasonably foreseeable projects) development projects in the project vicinity and region as well as the proposed project. As indicated in Section 4.12.6.2, roadway noise impacts have been identified and **Mitigation Measures 4.12.6.2A** and **4.12.6.2D** have been presented to reduce roadway noise impacts to the greatest extent feasible. As disclosed in Section 4.12.6.2, there are numerous instances in which there is no feasible means to reduce roadway noise impacts because of the existing developed nature of the affected roadway segment and/or the scattered nature of the sensitive receptors (i.e., residences), which prohibits the effectiveness of a soundwall. Therefore, no significant cumulative noise impacts would occur after implementation of the proposed mitigation measures. For those segments at which there is a cumulatively considerable impact and there is no feasible means to provide mitigation, the significant cumulative impact will remain significant and unavoidable.

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Note to Reader: The following Section 4.13 has been revised based on revisions to the Specific Plan project size. The section has also been revised to provide clarification in response to comments made about data consistency.¹

4.13 POPULATION, HOUSING, AND EMPLOYMENT

This section identifies population and housing conditions within the City of Moreno Valley and addresses potential impacts that may result from the construction and operation of the proposed WLC project. The analysis is based in part on population and housing projections identified by the California Department of Finance (DOF), Southern California Association of Governments (SCAG), as well as information contained in the City's General Plan.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The analysis contained in this section is based in part on the following reference documents:

- *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California*, David Taussig & Associates, Inc., original dated January 2012, updated September, 2014.
- *Moreno Valley Economic Development Strategy*, John Husing, Ph.D., presentation to City Council January 18, 2012.

¹ Mainly Letter G-95 from Thomas Thornsley.

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- *City of Moreno Valley Draft Housing Element 2008 – 2014*, City of Moreno Valley, February 2011.
- *Economic Impacts the World Logistics Center*, PowerPoint presentation to the City Council, Beacon Economics, January 2013.

4.13.1 Existing Setting

4.13.1.1 Population Characteristics

The U.S. Census as reported by the DOF estimates the City’s current (2011) population at 194,451 persons.¹ SCAG projections estimate the population of the City, Riverside County, and southern California (SCAG) regions will continue to grow. The SCAG projects the City’s population will grow to 213,700 persons by the year 2020 and 255,200 persons by the year 2035 (Table 4.13.A).

Table 4.13.A: Population, Housing, and Employment Forecasts

	2011	2020	2035
Population²			
City of Moreno Valley	194,451	213,700	255,200
Riverside County	2,205,731	2,592,000	3,324,000
SCAG	18,163,664	19,663,000	22,091,000
Housing Units²			
City of Moreno Valley	55,635	60,000	72,800
Riverside County	804,913	834,000	1,092,000
SCAG	6,348,741	6,458,000	7,325,000
Employment¹			
City of Moreno Valley	25,120	48,000	64,400
Riverside County	551,492	939,000	1,243,000
SCAG	7,224,670	8,414,000	9,441,000

Sources:

¹ 2011 Employment data for the City and County is based on the *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California*, September 2014.

² 2011 Employment and Housing data for City and County based on the *E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011–2013, with 2010 Benchmark*, State of California Department of Finance, <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>, website accessed February 7, 2014. *Draft 2012 RTP Growth Forecast*, Southern California Association of Governments, <http://www.scag.ca.gov/forecast/index.htm>, date accessed March 15, 2012

4.13.1.2 Housing Characteristics

The number of housing units in the City has increased to accommodate the City’s growing population (Table 4.13.B). Currently, the DOF identifies that over three-quarters of the existing housing units in the City are single-family detached units (Table 4.13.C). Multiple-unit dwellings comprise approximately 15 percent of the City’s current housing stock.

¹ E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011–2013, with 2010 Benchmark, State of California Department of Finance, <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>, May 2011, website accessed February 7, 2014.

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Table 4.13.B: City of Moreno Valley Housing Units, 1990, 2000, and 2010

Year	Housing Units	Increase (%)
1990	37,945 ¹	—
2000	41,462 ²	9.3
2010	55,559 ³	25.4

¹ City of Moreno Valley Draft Housing Element 2008 – 2014. City of Moreno Valley. February 2011.

² California Department of Finance: California State Data Center. Data derived from Housing Characteristics, 2000 Census of Population and Housing

³ State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, 2011–2013, with 2000 Benchmark. Sacramento, California, May 2013.

Table 4.13.C: Composition of the Housing Stock, 2010

Housing Type	City of Moreno Valley	
	Number of Units	Percentage
Single-Family, Detached	44,842	80.7%
Single-Family, Attached	1,127	2.0%
2- to 4-Unit Structure/ 5- or More Unit Structure	8,226	14.8%
Mobile Home	1,364	2.5%
Total	55,559	100%

Source: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, 2011–2013, with 2000 Benchmark. Sacramento, California, May 2010.

4.13.1.3 Employment Characteristics

As identified in Table 4.13.A, approximately 25,120 jobs were located within the City in 2011. Based on available data from 2012 (SCAG 2013), the largest share of Moreno Valley’s jobs were in the education sector (41.5%). The top four employment sectors, education (41.5%), retail trade (17.8%), leisure/hospitality (10.8%), and professional and management (6.0%) accounted for three-fourths of jobs in the City. Table 4.13.D provides a breakdown of the percentage by job type for the most recent available data (2013). The Husing Report presented to the City Council in January 2012 also indicated that medical services and logistics were two of the few employment categories to show significant growth during the economic downturn starting in 2008 (Husing 2012).

NOTE: This table had been updated based upon the updated Profile of the City of Moreno Valley, by the Southern California Association of Governments 2013.

Table 4.13.D: City of Moreno Valley 2012 Employment Percentage by Sector

Job Sector	Percentage of Employees
Education	41.5%
Retail Trade	17.8%
Leisure/Hospitality	10.8%
Professional and Management	6.0%
Public Administration	5.0%
Manufacturing	3.7%
Finance/Insurance/Real Estate	3.2%
Other Services	3.6%
Construction	3.1%

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Table 4.13.D: City of Moreno Valley 2012 Employment Percentage by Sector

Job Sector	Percentage of Employees
Transportation/Warehousing/Utilities	2.7%
Wholesale	1.6%
Information	0.8%
Agriculture	0.3%
TOTAL	100%

Source: *Profile of the City of Moreno Valley*, Southern California Association of Governments, <http://www.scag.ca.gov/Documents/MorenoValley.pdf>, date accessed February 7, 2014.

The jobs-to-housing ratio measures the extent to which job opportunities in a given geographic area are sufficient to meet the employment needs of area residents. This ratio identifies the number of jobs available in a given region compared to the number of housing units in the same region. For example, a region with a jobs-to-housing factor of 1.5 would indicate that 1.5 jobs exist for every housing unit within that region. The standard used for comparison is the jobs-to-housing ratio of the SCAG region, is currently 1.24 jobs for every household. This standard is used because most residents of the region are employed somewhere in the SCAG region. A City or sub-region with a jobs-to-housing ratio lower than the overall standard would be considered a “jobs poor” area, indicating that many of the residents must commute to places of employment outside the sub-area. Table 4.13.E shows the current and potential jobs/housing ratios for the City, Riverside County, and SCAG.

Table 4.13.E: Existing and Future Jobs/Housing Ratios¹

	2011 Jobs/Housing Ratio	2035 Jobs/Housing Ratio
City	0.45	0.88
Riverside County	0.69	1.14
SCAG	1.14	1.29

¹ Ratios calculated from values listed in Table 4.13.A

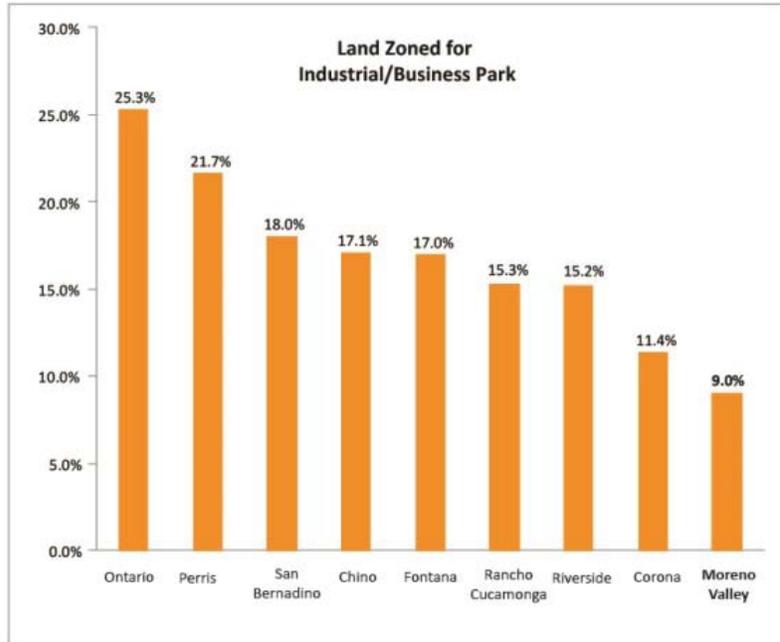
The 2011 estimated jobs-to-housing ratios for the City, County, and SCAG region are 0.45, 0.69, and 1.14, respectively. The 2035 future jobs-to-housing ratios for the City, County, and SCAG region are 0.88, 1.14, and 1.29, respectively. These ratios indicate that both Riverside County and the City of Moreno Valley are “jobs poor” because the jobs-to-housing ratios are below the Southern California region (as defined by SCAG). The Husing Report presented to the City Council in January 2012 indicated that the jobs to housing ratio for Southern California had actually declined from 1.25 to 1.04 from 2007 to 2010 as a result of the economic downturn (Slide 7, Husing 2012).

A low jobs/housing ratio results in longer distances that residents of Moreno Valley must drive to and from work. This factor may contribute to the City’s property values which are currently about half of the regional average (Source: *Profile of the City of Moreno Valley*, SCAG, May 2013). For example, the median home sales price in Moreno Valley in 2010 was \$155,000 compared to the regional average of \$291,000. One result of a jobs/housing imbalance is a weaker or lower tax base with which to support public services. The City also experiences a large “leakage” of potential sales tax revenue due to the resident workers’ absence during workdays, as well as the lack of business and industry taxes compared to other jurisdictions of similar size.

4.13.1.4 City Economic Conditions

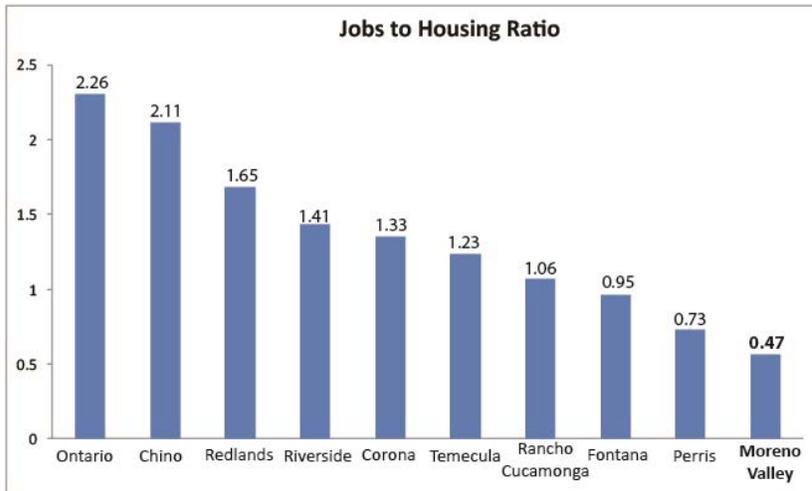
Moreno Valley is Riverside County’s second largest city with a population of nearly 200,000 people (2012) and a land area of more than 50 square miles. The City incorporated in 1984. The majority of the land in the City was designated for residential development. Over the years, the plan for Moreno

Valley has remained overwhelmingly residential in character. Little of the City's area (approximately 9%) is allocated for job producing land uses today. More than 90 percent of the City is designated for non-commercial land uses such as residential, open space and parks¹ see figure below:



Comparison of Land Zoned for Industrial/Business Park
(Moreno Valley Economic Development Action Plan, 2011)

Moreno Valley has less than one job for every two homes (0.47), which is about one-third of Riverside's rate and about one-fifth of Ontario's, see figure below.²



Comparison of Jobs to Housing Ratios *(SCAG City Profiles, May 2013; Fiscal and Economic Impact Study, David Taussig & Associates, 2014)*

¹ City of Moreno Valley Economic Development Action Plan, 2011

² SCAG City Profiles, May 2013; Fiscal and Economic Impact Study, David Taussig & Associates, September 2014

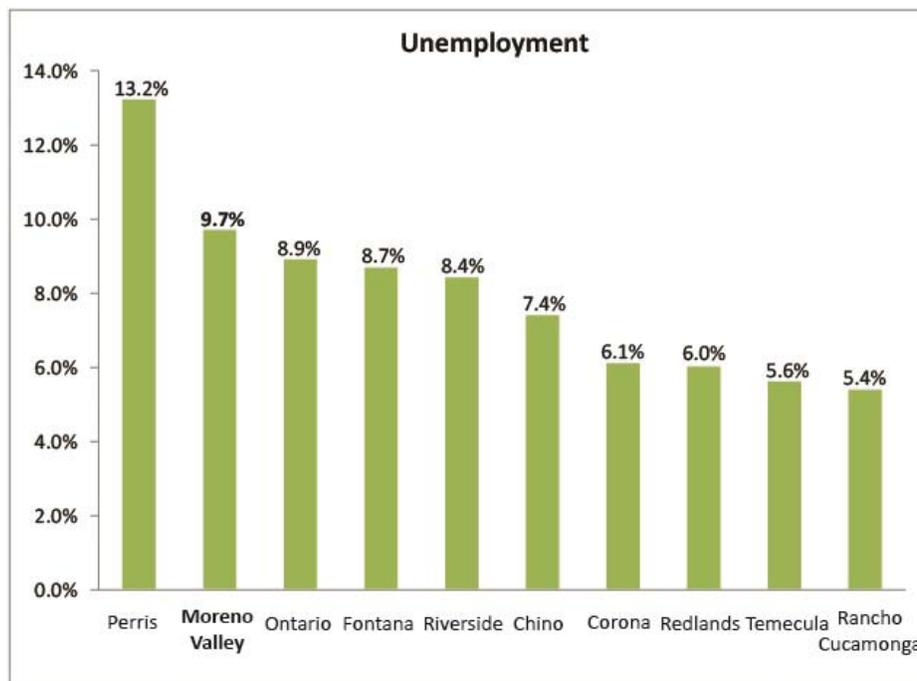
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This has created a significant jobs-housing imbalance which resulted in chronically difficult economic and social conditions. As a result, a large majority of Moreno Valley’s workforce commutes to jobs outside the City, with an average daily commute of 76 minutes.¹ The City has a very limited tax base from which to generate tax dollars to fund expensive residential services. In 1996, the City enacted a utility tax to offset operational deficits resulting from the slowdown in residential development and the development fees which they provided.

“The city became burdened with too much residential development, which does not generate enough property tax revenue to pay for the city services such development demands. Every new home constructed drained the city’s coffers over time, and the city needed the more lucrative tax base of commerce and industry—which hasn’t developed—to make up the difference.” *Los Angeles Times*, October 28, 1996

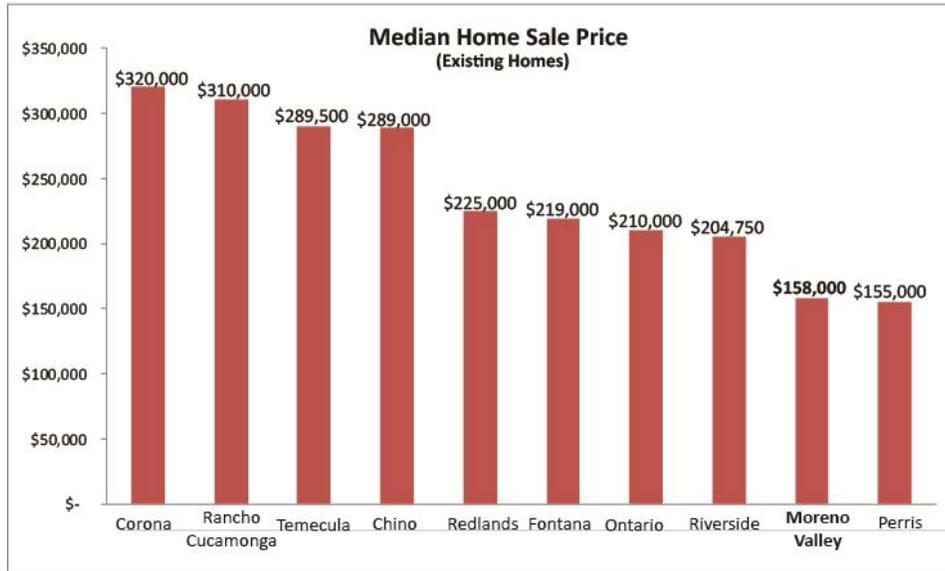
Average household income in Moreno Valley is \$56,000, well below the Riverside County average. Nearly one person in five or 20 percent of Moreno Valley is living below the poverty level.² Fifty percent of the population has a high-school education or less and Moreno Valley has one of the highest high-school drop-out rate in the county.

Unemployment in Moreno Valley remains the highest in the region at 9.7 percent³ and median house prices are among the lowest in the Inland Empire at \$158,000.⁴ See figures below:



Comparison of Unemployment Rates (Monthly Labor Force Data for Cities, California Employment Development Department, April 2014)

¹ SCAG, Profile of the City of Moreno Valley, May 2013
² Husing, Press Enterprise Letter to the Editor, May 15, 2014
³ California Employment Development Department, April 2014
⁴ (SCAG City Profiles, May 2013)



Comparison of Median Home Sale Prices
(SCAG City Profiles, May 2013)

In April of 2011, the City adopted a 2-year Economic Development Action Plan as a short-term and long-term approach to the difficult economic conditions facing the City. The logistics and healthcare industries were identified as the two primary areas of opportunity for the City. The Action Plan focused on five areas of opportunity in the City and established key initiatives for each one. In April 2013 the City conducted additional public hearings and adopted a 3-year Action Plan which established fourteen objections aimed at increasing the City’s overall economic development efforts and expanded these efforts to nine areas in the City. The World Logistics Center project is identified as one of the Action Plan’s goals for eastern Moreno Valley. The World Logistics Center project directly responds to the City’s Action Plan, representing a major shift in the City’s approach to long-range community planning and economic stability.

4.13.1.5 Economic Assessment Factors

The *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California* (David Taussig & Associates, Inc. (DTA), 2014) prepared for the proposed WLC project evaluates the likely fiscal and economic impacts of the proposed WLC project within the City. The following information is from the Executive Summary of the DTA study:

The purpose of the study is to estimate the net fiscal impacts of the proposed WLC project and construction of the project on the City’s General Fund. The fiscal impacts identified in the study include recurring municipal revenues and costs to the City General Fund that result from the land use scenario analyzed. City General Fund revenues are generated from a variety of sources including property taxes, sales taxes, fees, and fines. Costs to the City’s General Fund are associated with a variety of services, such as police protection, fire protection, public works maintenance, and general government services. While the City also expends revenues from a series of other special funds outside of the General Fund, these revenues include a Moreno Valley Library property tax, Community Services District and Community Facilities District assessments and special taxes, and various enterprise funds. As these revenues are generally equal to the cost of the services that they finance, they are essentially break-even and are not typically included in a fiscal analysis for a municipality. As a result, most fiscal analyses focus on

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the General Fund, where any shortfalls or surpluses can be easily identified, and such is the case for this Study.

However, in preparing the World Logistics Center's (the Center) fiscal analysis, DTA did notice certain anomalies occurring related to the Moreno Valley Fire property tax, in that the revenues generated by this special fund appear to be greater than the fund's expenditures on fire services to be provided by the City to the Center. While the projected fiscal surplus generated by the Moreno Valley Fire property tax fund was not included in the General Fund analysis, DTA felt that a brief discussion of this revenue source within the text of the Study would better inform the public regarding the entire fiscal impact of the Center on the City.

The fiscal analysis focuses on the impacts of the Center on the General Fund if it were built during fiscal year 2012-13, based on cost and revenue criteria and assumptions existing during that fiscal year. As is the case for most General Fund fiscal analyses, it would be speculative to *Fiscal & Economic Impact Study May 21, 2014 World Logistics Center – City of Moreno Valley Page II* project future cost and revenue factors because there is no certainty regarding what those factors will be. For example, while the City will be increasing its annual costs as it eliminates a furlough program that it established during the Great Recession, the Center itself is expected to generate additional revenues in future fiscal years due to increases in logistics facilities property values above the \$90 per square foot assumed in the Study. Based on a recent appraisal prepared by Coldwell Banker, the Center site's property valuation has already increased by more than 10%. Assumptions made regarding the relative levels of cost and revenue increases for factors such as these in future years would typically create a bias in the fiscal analysis that could in itself invalidate the results of the Study.

The DTA study also identifies the general economic impacts on the City that would occur and quantifies these impacts wherever possible. General economic impacts include additions to the City's employment, economic output, and earnings. The study also distinguishes between one-time impacts and permanent impacts. One-time impacts include benefits to the City that occur on a non-recurring basis as a result of construction activity, while permanent impacts refer to benefits that occur on a continuing basis, year after year. An examination of these conditions relative to potential population, housing and employment impacts is provided in Section 4.13.5.1, *Population Growth*.

4.13.1.6 NOP/Scoping Comments

A representative of a conservation group and several individuals said the EIR should address the loss or transfer of 7,700 housing units from the Moreno Highlands Specific Plan to other locations in the City. Some residents commented that fiscal commitments by the City on other local projects by this developer have resulted in expenditures of funds that could otherwise have been used for City services. It should be noted the analysis of this change was largely addressed in the updated (2011) Housing Element that recognized the Moreno Highlands Specific Plan would probably not be built.

4.13.2 Existing Policies and Regulations

4.13.2.1 Federal Regulations

The Federal Community Development Block Grant (CDBG) monies are part of Federal housing assistance programs at the local level. Housing and Urban Development (HUD) and CDGB monies are a function of the potential change in the jobs and housing mix (<http://www.hud.gov/offices/cpd/about/conplan/>). The HUD's Office of Community and Planning Development's (CPD's) Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a

communitywide dialogue to identify housing and community development priorities that align and focus funding from the four CPD formula block grant programs: the CDBG, the HOME Investment Partnership (HOME), the Emergency Solutions Grant (ESG) program, and the Housing Opportunities for Persons with AIDS (HOPWA) program.

CPD Maps is an online data mapping tool for place-based planning. Grantees and the public can use CPD Maps to analyze and compare housing and economic conditions across their jurisdictions. The CPD Maps tool is publicly available, giving all community stakeholders access to the same data. The Consolidated Plan template allows grantees to insert maps and data tables from CPD Maps with ease, throughout their plans.

4.13.2.2 State Regulations

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The most recently completed RHNA planning period is January 1, 2006, to June 30, 2014. Due to the requirements of SB 375, SCAG is preparing the next RHNA planning cycle, which will cover October 1, 2013, to September 30, 2021.

4.13.2.3 Regional and Local Regulations

County of Riverside Housing and Land Use Policies. The Housing Element is one of the seven General Plan elements mandated by the State of California as articulated in Sections 65580 and 65589.8 of the Government Code. Each city and county is required to discuss how it will meet its fair share of the housing need in the State.

The County of Riverside has a relevant policy in the Land Use Element of the County General Plan. To support future growth of the population and housing stock in the County of Riverside, the Land Use Element contains policies to ensure adequate utilities for new development (County of Riverside 2003). Specifically the policy LU 1.6 states...“Coordinate with local agencies, such as the Local Agency Formation Commission (LAFCo), service providers, and utilities to ensure adequate service provision for new development.”

City of Moreno Valley General Plan. The City’s General Plan Chapter 9 (Goals and Objectives) establishes goals and objectives to guide the development, redevelopment, and preservation of a balanced housing inventory within the City. Specific policies relevant to the proposed WLC project include:

Objective 2.5 Promote a mix of industrial uses which provides a sound and diversified economic base and ample employment opportunities for the citizens of Moreno Valley with the establishment of industrial activities that have good access to the regional transportation system, accommodate the personal needs of workers and business visitors; and which meets the service needs of local businesses.

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.

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Goal 2.4 A supply of housing in sufficient numbers suitable to meet the diverse needs of future residents and to support healthy economic development without creating an oversupply of any particular type of housing.

4.13.3 Methodology

To determine the potential for impacts related to population and housing, the current uses, overall condition of the project site, historic and current population and housing characteristics, and future projections for population, housing, and employment were identified. This analysis is based on data published by the DOF and SCAG, as well as information presented in the City's General Plan and the County of Riverside General Plan.

As identified in the study prepared by David Taussig & Associates, Inc. (DTA), fiscal impacts arising from a land development project can be broadly categorized as one of two types: one-time and recurring impacts. Each of these broad types can be divided into a revenue component and a cost component. The study assumes that one-time revenues would directly offset one-time costs; therefore, the fiscal impacts considered focus on ongoing, or recurring, fiscal impacts of the proposed WLC project on the City's General Fund. Revenues generated outside of the City's General Fund (e.g., special district revenue) or costs incurred by the City outside of the General Fund (e.g., costs financed through a special district) are not included in this analysis.

This methodology involves calculating the average citywide revenues/costs per Persons Served,¹ utilizing the fiscal year 2012–2013 City budget, and applying these revenue/cost factors to the specific number of Persons Served projected for the proposed WLC project. For analysis purposes, all recurring revenues and costs are stated in constant (uninflated) 2012 dollars based on the assumption that the relative impacts of inflation in future years will be the same for both of these fiscal impact categories.

Direct economic impacts reflect the initial or first-round increases in jobs, earnings, and output, all of which occur directly on site. Indirect/induced economic impacts are the secondary and other additional rounds of economic activity that occur as a consequence of the direct impacts, and can occur elsewhere within the City. The indirect impacts represent the economic activity (buying and selling of goods and services) of suppliers to the proposed land uses. The induced impacts represent the economic activity that results from household spending by employees of all companies directly and indirectly affected by the construction and operation of the proposed WLC project. The study estimated the number of direct employees in the proposed WLC project based upon an average employee per square foot ratio for similar land uses in the region. Additionally, all economic impacts are stated in constant (uninflated) 2012 dollars, based on the assumption that the relative impacts of inflation in future years may be difficult to gauge.

4.13.4 Thresholds of Significance

The following thresholds of significance regarding potential impacts related to population and housing are based on *CEQA Guidelines* (2011). A project would have a significant impact on population and housing if it would:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);

¹ A service population comprising all residents and 50% of employees.

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) that may lead to fiscal or economic impacts;
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; and/or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4.13.5 No Impact/Less than Significant Impacts

4.13.5.1 Population Growth

Threshold	Would the proposed WLC project induce substantial population growth in an area, either directly (e.g., new homes and businesses) or indirectly (e.g., extension of roads and infrastructure)? Would the proposed WLC project induce substantial population growth in an area, either directly (e.g., new homes and businesses) or indirectly (e.g., extension of roads and infrastructure) that may lead to fiscal or economic impacts?
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Growth-Related Impacts. CEQA requires a discussion of ways in which the proposed WLC project could be growth inducing (see also Section 5.0, *Other CEQA Topics*). The *CEQA Guidelines* identify a project as growth inducing if it fosters economic or population growth, or the construction of additional housing either directly or indirectly in the surrounding environment (*CEQA Guidelines* Section 15126.2[d]). New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

A project could indirectly induce growth by reducing or removing barriers to growth, or by creating a condition that attracts additional population or new economic activity. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sectors. Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, the growth-inducing potential of a project would be considered substantial if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies (e.g., SCAG). Substantial growth impacts could also occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with the increase in project population and thus reducing or removing the barriers to growth. This occurs in suburban or rural areas where population growth results in increased demand for service and commodity markets responding to the new population. This type of growth is, however, a regional phenomenon resulting from introduction of a major employment center or regionally significant housing project. Additional commercial uses may be drawn to the area by the increased number of residents in the area as a result of a project; however, it is expected that any such development would occur consistent with planned growth identified in the General Plan or applicable specific plans.

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As shown in previously referenced Tables 4.13.A and 4.13.B, the City's population has grown steadily over the past decades. Population projections developed by SCAG estimate the City's population will reach approximately 213,700 persons by the year 2020 and approximately 255,200 persons by the year 2035.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

The extent to which the new jobs created by a project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a project. Construction of the proposed WLC project will create short-term construction jobs. These short-term positions are anticipated to be filled by workers who, for the most part, reside in the project area; therefore, construction of the proposed WLC project will not generate a permanent increase in population within the project area. Development envisioned under the proposed WLCSP consists of approximately 40.6 million square feet of logistics warehouse and general warehouse facilities (WLCSP, September 2014).

An economic study of the project prepared by DTA concluded that the proposed WLC project could directly generate up to 20,300 new jobs within the City.¹ In addition to the projected on-site job creation, the DTA study estimates the proposed WLC project could generate new off-site jobs (i.e., indirect/induced employment) in all industries of the economy. The DTA study also estimated that an additional 7,386 indirect/induced jobs could be created in the County, of which 3,693 jobs were projected to be within the City as a result of project implementation. This estimate is derived from the Impact Analysis for Planning (IMPLAN) Input/Output Modeling System, which is a quantitative economic model that provides an approximate measure of the "multiplier effect" of a firm's spending on payroll and purchase of goods and services. While the specific location of the potential additional indirect/induced jobs created within the County cannot be specifically determined, it is reasonable to assume that some percentage of these jobs will be support service jobs and are likely to be located in the proposed WLC project vicinity, and therefore the City.

The WLC project does not include a residential component. The proposed WLC project is located within an area that is currently largely vacant and planned for mix of residential, commercial, business park, and open space land uses in accordance with the General Plan Community Development Element. The proposed WLC project includes a General Plan Amendment to change the existing mix of land use designations to Logistics Development and Light Logistics.

If approved, the WLCSP would supplant the approved Moreno Highlands Specific Plan (MHSP) project that did have a residential component. The EIR for that project indicated it would have increased the City's population by 17,019 persons over 15 years (7,736 units × 2.2 persons/unit). However, because the City is considered housing rich (and jobs poor) by SCAG, the loss of that projected population growth is not considered a significant impact and, in fact, a number of State policies (e.g., SB 375) encourage the creation and development of jobs-producing development in areas with poor jobs/housing numbers such as that which exists in the City.

Most of the site has been used for dry farming since the early 1900s and much of the proposed WLC project site continues to be used for dry farming at the present time. Currently, there are seven single-family homes in various locations on the property along with associated ranch/farm buildings. Streets, water and sewer utilities, and municipal services would be extended to serve the proposed WLC project. The proposed WLC project may benefit other development projects in the project area by the installation of infrastructure (e.g., roads and utilities), but is not expected to induce substantial population growth into the area since there would be no large areas of vacant land left in the east end of the City (south of SR-60) that could be developed with residential uses.

¹ Table B, Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California (David Taussig & Associates, Inc., September 2014).

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Development of high-cube logistics warehouse and general warehouse facilities will create jobs in the local economy. However, it is difficult to predict exactly how many new jobs would be generated by the proposed WLCSP. One concern expressed during the NOP/scoping period was the amount of new employment that would actually be generated by the WLC project. Table 4.13.F provides several sources for estimating potential new direct employment for the proposed project, which could range from 16,240 to 21,315 jobs, depending on what data source is selected to predict future employment within the WLCSP.

NOTE: The following changes to the table have been made due to revision to the Specific Plan project size and to clarify the discussion on projected jobs by the Skechers and HF Corporate Park.

Table 4.13.F: Comparison of Direct Employment Projections for Other High-Cube Logistics Projects

Source/Project (Jurisdiction)	Jobs / 1000 ft ²)	Square Feet/ Employee	Square Feet of Building	Projected Direct Jobs
World Logistics Center ¹ Specific Plan (City of Moreno Valley)	0.5:1,000	2,000:1	40,600,000	20,300
Stratford Ranch ³ (City of Perris)	0.4:1,000	2,500:1	1,712,880	685
Skechers Only (City of Moreno Valley)	0.5:1,000	2,000:1	1,820,000	910 ⁴
Husing Logistics Report ⁵ (City of Moreno Valley)	0.525:1,000	1,906:1	NA	NA
Vogel Industrial Project ⁶ (City of Moreno Valley)	0.4:1,000	2,500:1	1,616,133	646

¹ DTA Public Works Database; confirmed by "Employment Density Study," SCAG (2001), and "Logistics Trends and Specific Industries," NAIOP Research Foundation (March 20110).

³ Inland Empire Distribution Center Operations Profile, WCL Consulting, June 10, 2008. 2,500 square feet per employee is an average of the Inland Empire rates.

⁴ Total projected direct employment.

⁵ From Husing report to the City Council in January 2012 based on 2003 study by U.S. Energy Information Agency shipping and distribution centers increase by 5% making it 1 employee/ 2,000 square feet.

⁶ Inland Empire Distribution Center Operations Profile, WCL Consulting, June 10, 2008. 2,500 square feet per employee is an average of the Inland Empire rates.

It should be understood that the actual eventual number of employees generated by the project will vary depending on a variety of economic factors (e.g., actual companies that relocate and current hiring conditions). The projected employment estimate also does not take into account relocation of existing employees from other jurisdictions as a result of existing businesses relocating into the WLC project. However, these would be counted as "new" employees for the City of Moreno Valley. For the purposes of this analysis, the EIR will use 20,300 employees working at the WLC or one employee per 2,000 square feet as a conservative estimate (in terms of environmental impacts) for future employment growth from WLCSP development.

The new employment opportunities resulting from development of the proposed high-cube logistics warehouse and general warehouse uses will raise the City's current jobs-to-housing ratio by providing additional jobs to local residents. While the place of residence of the persons accepting employment provided by the proposed uses is uncertain, due to the City's projected jobs/housing ratio, it is reasonable to assume and therefore expect that some percentage of these jobs would be filled by persons already living within the City or project area. Therefore, no significant increase in population of the City would result from the development or operation of the proposed WLC project, resulting in a less than significant impact associated with growth inducement and no mitigation is required.

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The second threshold for significance is “Would the proposed WLC project induce substantial population growth in an area, either directly (e.g., new homes and businesses) or indirectly (e.g., extension of roads and infrastructure) that may lead to fiscal or economic impacts?” In that regard, the following provides an analysis of the projected fiscal effects of the proposed WLCSP project.

Indirect City Population Impacts Related to Fiscal and Economic Changes. If the MHSP project is not built, it could be argued the City may experience a financial impact from the loss of property tax, sales tax, and other revenues related to growth and development. The following analysis demonstrates that the City will benefit financially by employment and development of logistics warehousing as a result of the WLCSP project.

As detailed in the DTA study, recurring municipal revenues available to the City include those listed in Table 4.13.G. Total recurring revenues available to the City are estimated at approximately \$11,257,466 per year. As shown in Table 4.13.G, the greatest percentage of revenue is attributed to the Property Tax In-Lieu of Vehicle License Fee (40.2%), followed by Secured Property Tax (29.1%), and Business Receipts Tax and Licenses (10.8%).

Table 4.13.G: Recurring Fiscal Revenues City of Moreno Valley (City General Fund)

Source	Amount	Percent ¹
Property Tax In-Lieu of Vehicle License Fee	\$ 4,522,818	40.2%
Secured Property Tax	\$ 3,276,191	29.1%
Business Receipts Tax & Licenses	\$ 1,210,847	10.8%
Tax Revenues	\$ 607,657	5.4%
Indirect Sales Tax	\$ 423,144	3.8%
Charges for Services	\$ 386,032	3.4%
Unsecured Property Tax	\$327,619	2.9%
Franchises	\$ 251,896	2.2%
Property Transfer Tax	\$ 100,495	0.9%
Intergovernmental Revenues	\$ 60,918	0.5%
Licenses/Permits	\$ 57,771	0.5%
Direct Sales Tax	6,000	0.1%
Other Revenues	\$ 12,285	0.1%
Fines and Forfeitures	\$ 6,498	0.1%
Transfers In	\$ 3,757	0.0%
Use of Money & Property	\$ 2,538	0.0%
Total	\$ 11,257,466	100.0%

¹ Numbers may not sum correctly due to rounding to the nearest hundredth.
Source: Table 3A, Fiscal and Economic Impact Study World Logistics Center Moreno Valley, David Taussig and Associates, September 2014.

Recurring municipal services costs to the City include those listed in Table 4.13.H. Total recurring costs to the City are estimated at approximately \$5,557,674 per year. As shown in Table 4.13.H, the greatest percentage of cost is attributed to the Police Services (35.8%), followed by Infrastructure and Parks Maintenance Costs (34.1%), and Fire Services (13.3%).

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Table 4.13.H: Recurring Fiscal Costs City of Moreno Valley (City General Fund)

Source	Amount	Percent ¹
Police	\$ 1,992,019	35.8%
Infrastructure & Parks Maintenance Costs	\$ 1,895,474	34.1%
Fire Services	\$ 739,545	13.3%
General Government	\$ 391,715	7.0%
Development Services	\$ 211,893	3.8%
Public Works	\$ 109,551	2.0%
Transfers Out	\$ 63,761	1.1%
Other Uses	\$ 63,659	1.1%
Animal Services	\$ 47,719	0.9%
Community Development	\$ 42,338	0.8%
Total	\$ 5,557,674	100.00%

¹ Numbers may not sum correctly due to rounding to the nearest hundredth.

Source: Table 3B, Fiscal and Economic Impact Study World Logistics Center Moreno Valley, David Taussig and Associates September, 2014.

Table 4.13.I provides an overall summary of the fiscal impact to the City based on projected revenues generated by the proposed WLC project. As shown in Table 4.13.I, project recurring annual fiscal surplus that would be available to the City is estimated at \$5,699,792, which is equal to 2.03 times the project annual City General Fund costs.

Table 4.13.I: Net Fiscal Impact City of Moreno Valley (City General Fund)

Category	Amount
Total Recurring Revenues	\$ 11,257,466
Total Recurring Costs	\$ 5,557,674
Annual Recurring Surplus/(Deficit)	\$ 5,699,792
Total Annual Revenue/Cost Ratio	2.03

Source: Table 3C, Fiscal and Economic Impact Study World Logistics Center Moreno Valley, David Taussig and Associates September 2014.

Table 4.13.J presents the project characteristics that are the basis for the fiscal impact assessment. The locations of the additional indirect jobs that will be created within the County cannot be specifically determined; however, some percentage of these jobs will be support service jobs and are likely to be located in the general project vicinity. Based on experience with similar types of projects, DTA estimated that half of these indirect jobs would be located within the City. The study also considers Total Output (i.e., total expenditures including sales or gross receipts, or other operating income) based on the different types of development projected to occur. For gross receipts, the study considers the initial or first-round increase in output (e.g., total spending/gross receipts, including payroll), all of which would occur directly on site. Indirect impacts represent the economic activity of supplier and/or supporting businesses. Induced impacts represent the economic activity that results from household spending by employees that may result from direct and direct employment generation of the proposed WLC project.

NOTE: The following changes to the table have been made due to revision to the Specific Plan project size.

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Table 4.13.J: Project-Related Economic Characteristics

Land Use Assumptions	Square Feet
Logistics Development (LD)	40,397,000
Light Logistics (LL)	200,000
“logistics support” fueling station	3,000
Employment Assumptions¹	Employees Per 1,000 Square Feet
Logistics (LD/LL)	0.50
Retail (“light logistics”)	2.50
Wage Assumptions²	Annual \$
Warehousing/Transportation (Logistics) ³	\$ 40,926
Construction	\$ 48,825
Retail (“light logistics” fueling station) ⁴	\$22,885
Riverside County Average (2010)	\$ 40,602

¹ Source: DTA Public Works Database; confirmed by “Employment Density Study,” SCAG (2001), and “Logistics Trends and Specific Industries,” NAIOP Research Foundation (March 2011).

² Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics Reports (California, 2010) for Riverside-San Bernardino-Ontario Metropolitan Area and Riverside County; confirmed by Bureau of Labor Statistics (May 2010).

³ Standard Warehousing/Transportation Salary (\$41,229) plus a small salary increase for 10% of employees to account for presence of high-level management and related office personnel.

⁴ Reflects blended average by employee count of local “retail” and “food service/accommodation” salary codes
Source: Table 4A, Fiscal and Economic Impact Study World Logistics Center Moreno Valley, David Taussig and Associates September 2014.

As previously noted, potential economic impacts that may occur with project implementation include permanent employment (direct on site and indirect/induced), permanent output (gross receipts; total direct output plus output produced by suppliers and employee spending), and one-time construction impacts. Table 4.13.K summarizes the permanent (recurring) employment, wage, and gross receipts values associated with the proposed WLC project.

Table 4.13.K: Project Permanent (Recurring) Employment, Wages ,and Gross Receipts

Recurring Impact	Direct	Indirect/Induced	Total
Employees			
Countywide	20,307	7,387	27,693
Within City	20,307	3,693	24,000
Employee Wages			
Countywide	\$831 Million	\$ 300 Million	\$ 1.13 Billion
Within City	\$ 831 Million	\$150 Million	\$ 981 Million
Overall Output			
Countywide	\$1.5 Billion	\$ 870 Million	\$2.37 Billion
Within City	\$1.5 Billion	\$435 Million	\$1.94 Billion

Source: Tables 4B and 4C, Fiscal and Economic Impact Study World Logistics Center Moreno Valley, David Taussig and Associates September 2014.

The DTA study indicates that the creation of new jobs to the City will lead to more consumer spending by employees in existing retail establishments within the City, as well as new retail development that will be attracted to the City as a result of this spending. Job creation also results in increased tax revenues to the City through increased property taxes and sales taxes associated with development of the proposed WLC project. However, it is important to note that because of the difference in timing of the development of the various phases of the proposed WLC project, the number of employees summarized above will not be realized at the same time.

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Table 4.13.L summarizes the construction (one-time) employment, wages, and gross receipts values associated with the proposed WLC project.

Table 4.13.L: Project Construction (One-Time) Employment and Wages and Gross Receipts

Recurring Impact	Direct	Indirect/Induced	Total
Construction Employees			
Countywide	12,807	7,426	20,233
Within City	12,807	3,714	16,521
Construction Wages			
Countywide	\$625 Million	\$301 Million	\$ 927 Million
Within City	\$625 Million	\$151 Million	\$776 Million
Total Output from Construction Jobs			
Countywide	\$ 1.67 Billion	\$ 932 Million	\$ 2.6 Billion
Within City	\$ 1.67 Billion	\$ 466 Million	\$ 2.14 Billion

Source: Tables 4D and 4E Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California, David Taussig and Associates, September 2013.

As summarized in Table 4.13.L, development of the proposed WLC project is projected to create approximately 16,521 construction-related full-time equivalent (FTE) jobs within the City. Similar to recurring employment (i.e., permanent), it is likely that some percentage of these jobs will be associated with support services and are likely to be located in the vicinity of the proposed WLC project and therefore within the City.

The proposed WLC project does not include a residential component, so it would not directly generate additional new housing. Employees of the project that choose to live in the City would likely utilize the existing supply of housing within the City.

Based on the potential increase in jobs (additional 20,307 direct jobs) within the City and no substantial increase in population as a result of the project, the City's jobs-to-housing ratio would improve from the existing (2011) ratio of 0.45 to 0.82, thus achieving a greater jobs-to-housing balance within the City. Similarly, the potential new County employees that may be generated by the proposed WLC project would increase the total County employment to 571,799 from 551,492 resulting in a ratio of 0.71 from 0.69.

As development of the proposed WLC project is expected to occur over the course of many years, the jobs-to-housing ratio will not significantly change immediately. The City's current jobs-to-housing ratio is exceptionally low when compared to SCAG standards; therefore, the need for employment is immediate. A balance between jobs and housing within the City would have a positive impact by decreasing costs associated with commuting and traffic congestion. It also provides savings to consumers in the operation and maintenance of automobiles, and saving to local public agencies in terms of the need to construct and maintain new road improvements.

Summary of Impacts. Based on the foregoing discussion and as evidenced in Tables 4.13.I, 4.13.K, and 4.13.L, implementation of the proposed WLC project would not result in a deficit in the City's General Fund. The estimated surplus is \$5,699,792, which is equal to 2.03 times the projected annual City General Fund costs. Additionally, the proposed WLC project is expected to generate sizeable, substantial, and lasting employment, wages, output, and revenues for the City and region. Therefore, potential fiscal and economic changes that could affect the City's population or housing are considered to be less than significant, and no mitigation is required.

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4.13.5.2 Displace Substantial Housing/People

Threshold	Would the proposed WLC project displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?
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Displace Existing People/Housing. The WLC project site currently contains seven rural residences. At the City Council meeting on May 22, 2012, some of the existing residents stated that they did not want to be included in the Specific Plan. After deliberation, the Council decided to include the rural properties in the Specific Plan in the interest of comprehensive land planning for the WLC property. Upon approval of the Specific Plan, these properties can continue as non-conforming uses, and the WLC Specific Plan designates these properties as “Light Logistics” (LL), which allows for future industrial-related uses (vehicle storage, light assembly, etc.). In this way, the WLCSP will not remove or displace any of the existing residents or residences from the project site. As large warehouse buildings are developed near or adjacent to these residences, it may become less desirable to reside within the WLCSP area; however, the project itself does not cause housing displacement.

Therefore, impacts to the seven on-site residences would not be considered a significant housing impact. For these reasons, the WLCSP will not have significant population or housing impacts related to displacing substantial numbers of people or existing housing.

Displace Potential Future People/Housing. The City of Moreno Valley has been housing “rich” for many years, with much more housing stock than jobs according to data available from the SCAG. In addition, the recent economic downturn and related foreclosure/short sale conditions have left Moreno Valley, as with many housing rich communities, with an overabundance of housing stock. Section 4.10, *Land Use and Planning*, examines the potential environmental impacts related to the “loss” of 388 affordable housing units from the MHSP, as outlined in the City’s 2011 Housing Element. The Element acknowledges that the MHSP property may have to be used for employment-generating uses, and that “land use changes with the Moreno Highlands Specific Plan area will not hinder the City’s ability to meet its RHNA obligations.”¹ The 2011 Housing Element therefore documents that the City has an abundant supply of housing and can meet its RHNA requirements without relying on any units from the MHSP.

During the NOP/scoping process, several residents commented that development of the proposed WLCSP would result in the loss of 7,700 housing units from the project site that would have to be “made up” elsewhere in the City. The 2006 City Housing Element identified a potential for 5,240 units of the potential 7,700 housing units in the Moreno Highlands Specific Plan. However, an updated Housing Element adopted by the City in February 2011 indicated the Moreno Highlands area would be rezoned to support employment-generating uses rather than housing. It also concluded that “pursuing any land use changes with the Moreno Highlands Specific Plan area will not hinder the City’s ability to meet its RHNA obligations.” The term RHNA refers to the Regional Housing Needs Allocation (affordable housing allocations) from the SCAG.

Table 8-19.5 in the 2011 Housing Element states that after removing sites south of SR 60 and east of Redlands Boulevard, the Amended Inventory throughout the City west of Redlands accommodates:

- 4,100 Low and Very Low Income units, which is 1.3 times the RHNA number (3,045) (deleting sites south of SR-60 and east of Redlands Boulevard has no effect on low and very low income housing opportunities);
- 2,600 Moderate Income units, which is 2.1 times the RHNA number (1,239);

¹ Page 41, City of Moreno Valley Housing Element, February 2, 2011.

- 7,828 Above Moderate Income units, which is 2.5 times the RHNA number (3,068); and
- 14,528 total identified units, which is 1.94 times the total RHNA number (7,474).

Therefore, removal of the 388 affordable units originally identified in the MHSP (Table 8-19, page 40 of the Housing Element), including 233 “Very Low” and 155 “Low” units, will not have a significant impact on the City’s Housing Element or its ability to achieve its RHNA allocation.

The State Housing and Community Development Department (HCD) certified the City’s Housing Element as compliant with State law on May 31, 2011. This State HCD certification reinforces the conclusion that approval of the proposed project will not impede the City’s housing goals as set forth in the City’s Housing Element.

In April 2011, the City adopted its Economic Development Action Plan, which also identified the eastern part of the City as a potential area for major job-producing land uses. The *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California* (“Study”) prepared by DTA in 2014 concluded that the proposed WLC project would generate 20,307 direct jobs/employees to the City. Section 4.10.5.3 determined that the proposed WLC project is consistent with the 2011 Housing Element, and it will not displace substantial numbers of existing housing or necessitate the construction of replacement housing elsewhere. Therefore, no significant displacement impacts relative to people or housing are expected to occur, and no mitigation is required.

4.13.6 Significant Impacts

Based on the analysis in Section 4.13.5, the WLC project will not have any significant impacts relative to population, housing, or employment. Therefore, no mitigation is required. However, in response to Comment F-8-94 and other related comments, the Final EIR Volume 1 recommends the City add the following text to the WLCSP Development Agreement approval with the concurrence of the applicant:

“Highland Fairview will establish a WLC Local Hiring Program to actively encourage the hiring of Moreno Valley residents for job opportunities at the World Logistics Center. Highland Fairview will encourage its contractors, suppliers and tenants to be active participants in a Moreno Valley Employment Resource Center (ERC) job opportunity announcement program.

World Logistics Center employers will be encouraged to submit all job announcements to the Moreno Valley Employment Resource Center at least one week prior to providing such announcements to other agencies or to the general public. Potential employers will be urged to provide information regarding job opportunities to the ERC including details regarding job titles, minimum qualifications, application processes, and employer contact information.”

4.13.7 Cumulative Impacts

The cumulative area for the discussion of population and housing impacts is the City of Moreno Valley. The proposed WLC project would require a General Plan Amendment and Zone Change to re-designate the site from a mix of land uses and zoning designations to Logistics Development and Public Utility land uses and a Specific Plan zoning designation. The project would not contribute to substantial population growth and therefore would not result in an increased demand on the current or future housing in the region. In addition, the Moreno Valley area is considered housing rich and jobs poor by SCAG, so the loss of population (and planned housing) would actually be a regional benefit according to the Regional Transportation Plan. The project may result in an influx of new workers who would need to locate temporarily or permanently in the area, but the City has an overabundance of existing housing stock due to current market conditions. Implementation of the

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proposed WLC project would actually benefit population and housing conditions relative to employment and jobs/housing ratio and, therefore, not result in cumulatively adverse impacts to population or housing. The WLC project would also not significantly induce growth into areas where growth was not previously anticipated since the WLC project area represents the last largest remaining vacant land in the City of Moreno Valley.

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Table 4.14.E: Project Consistency with General Plan Policies and Municipal Code Requirements
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NOTE TO READERS. *No major revisions have been made to this section in response to comments other than changes related to the revised Specific Plan.*

4.14 PUBLIC SERVICES AND FACILITIES

This EIR discussion includes an evaluation of police and fire services, as well as schools and parks. The analysis considers these public services in the proposed project vicinity and evaluates the impacts to service providers that would result from the construction and operation of the proposed uses as described in the Specific Plan. The analysis contained in this section is based on the following reference documents:

- City of Moreno Valley General Plan, City of Moreno Valley, July 11, 2006;
- City of Moreno Valley General Plan Final EIR, City of Moreno Valley, July 2006;
- Letter from Joel Ontiveros, Moreno Valley Police Department Chief, July 10, 2012;
- Letter from City Fire Chief Abdul R. Ahmad dated June 27, 2012;
- Moreno Valley School District website information on Developer Impact School Fees; and
- San Jacinto Unified School District website May 2012.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

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This section describes the existing public services within the City of Moreno Valley. The project site consists of the lands within the project boundaries and the project vicinity. The project vicinity consists of areas adjacent to the project site. This section differs slightly from other sections in that it is organized by the public service provider so continuity is maintained. Police Service is found in Section 4.14.1, Fire Protection is found in Section 4.14.2, Schools are found in Section 4.14.3, Parks are found in Section 4.14.4, and Cumulative Impacts are found in Section 4.14.5.

4.14.1 Police Protection

4.14.1.1 Existing Setting

The City of Moreno Valley contracts with the Riverside County Sheriff's Department (RCSD) for police services. Through this contract, the RCSD staffs the Moreno Valley Police Department (MVPD). The MVPD Chief provided a letter on July 10, 2012, that provided the following information on police service in the City. The MVPD has a service area of 51.5 square miles and a service population of 196,495 people. The main police station is located in the City Public Safety Building (PSB) at 22850 Calle San Juan De Los Lagos in Moreno Valley. In addition, the MVPD operates four storefront substations throughout the City. The MVPD occupies 44,800 square feet or 98 percent of the 45,900-square foot PSB with the remainder used by the City Fire Department. The MVPD also utilizes 405 parking spaces in the PSB secured lot. The MVPD Chief has indicated the PSB and parking lot are already at or near full capacity at this time. The MVPD maintains five operational divisions: Patrol, Detective, Special Enforcement, Traffic, and Administrative.

The MVPD handles a service demand of more than 130,000 calls for service (CFS) each year. The MVPD has a current demand of 657 CFS per year per sworn officer, and each deputy on patrol averages 8 CFS per 10-hour shift. There are no set response time goals, but the current response times average 6.15 minutes for Priority 1 calls (emergency), 13.8 minutes for Priority 2 (service need) calls, and 32.4 minutes for Priority 3 (business) calls.

Police services are paid for out of the City of Moreno Valley General Fund. There are currently 255 employees working at the MVPD and 198 of them are sworn peace officers. The MVPD maintains 166 vehicles to support its operations but does not have any commercial vehicle enforcement equipment or personnel at this time.

According to the Federal Bureau of Investigation, Uniform Crime Reporting Program, the national average for police department staffing is 2.3 officers per 1,000 residents. By comparison, the nationwide average for cities of comparable size to Moreno Valley is 1.8 officers per 1,000 residents, while the average for "west coast" area cities of comparable size is 1.2 officers per 1,000 residents. The police service ratio within the City is 1.0 officer per 1,000 citizens, and the City has indicated a commitment to maintain that ratio.

The PSB is approximately 6.5 miles from the project site and would be the closest station to service the proposed project site. The WLC site is located within City Beat 46 (MV46) but there are few calls from the project site at present.

NOP/Scoping Comments. Several residents asked during the scoping process what the impact of the project would be on existing and future public services like police and fire.

4.14.1.2 Existing Policies and Regulations

The City of Moreno Valley has developed policies and regulations in order to direct future activities and decisions in order to achieve the goals and objectives set forth in the City's General Plan and Municipal Code.

Community Design Element Policies

- 2.13.1 Limit the amount of development to that which can be adequately served by public services and facilities, based upon current information concerning the capability of public services and facilities.
- 2.14.3 Review development projects for their impacts on public services and facilities including, but not necessarily limited to, roadways, water, sewer, fire, police, parks, and libraries and require public services or facilities to be provided at the standards outlined in the Moreno Valley General Plan and the standards of applicable service agencies.

Safety Element Policies

- 6.8.1 Explore the most effective and economical means of providing responsive and adequate law enforcement protection in the future.
- 6.9.2 Require well-lighted entrances, walkways and parking lots, street lighting in all commercial, industrial areas and multiple-family residential areas to facilitate nighttime surveillance and discourage crime.
- 6.9.3 Incorporate "defensible space" concepts into the design of dwellings and nonresidential structures, including, but not limited to configuration of lots, buildings, fences, walls and other features that facilitate surveillance and reinforce a sense of territorial control.
- 6.11.1 Respond to any disaster situation in the City to provide necessary initial response and providing for key support to major incidents.
- 6.12.1 Support mutual aid agreements and communication links with the County of Riverside and other local participating jurisdictions.

NOTE: The following changes have been made in response to Comment F-13-32 in Letter F-13 from Johnson & Sedlack on Behalf of Sierra Club, Moreno Valley Group & Residents for a Livable Moreno Valley.

Ultimate Goals

- VII Emphasizes public health and safety, including, but not limited to, police, fire, emergency and animal services and protection from floods and other hazards.

City of Moreno Valley Municipal Code. Pursuant to Moreno Valley Municipal Code Section 3.42.070, the proposed project is subject to Police Facilities Commercial and Industrial Development Impact Fees. These fees contribute to the police services facilities provided for in the Existing General Plan area and Capital Improvement Projects. The fees provide financing for the acquisition of land for police and fire facilities as well as design, construction, improvements, and maintenance to the extent permitted by law.

4.14.1.3 Methodology

Based on discussion with City staff and previous environmental documents prepared by the City, the evaluation of impacts associated with the proposed project on police services includes the following:

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- Determine the existing police response time for the City based on RCSD goals;
- Determine the length of time for police services to arrive at the project site based on average travel time;
- Compare existing police response time and potential police response time; and
- Determine funding mechanism for future police services, staff, and facilities.

Police service funding impacts were evaluated by identifying compliance with local and RCSD goals and policies. Response time impacts were evaluated by comparing existing and anticipated average responses through RCSD response time goals.

4.14.1.4 Thresholds of Significance

Based on Appendix G of the *CEQA Guidelines*, police protection impacts would be considered significant if the following condition resulted from the construction or operation of the proposed project:

- Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services.

4.14.1.5 Less than Significant Impacts

Threshold	Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered law enforcement facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police services?
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The development and operation of the proposed project would increase demand for police protection services. In addition, the MVPD Chief has indicated the department would not be able to maintain current service levels if the WLC project were built. Initially, crimes of grand theft and malicious mischief during construction would be the potential major crime issue. However, it is anticipated that private security would be utilized during the construction process, similar to other private security services that are utilized for other construction projects in the City. Typical operational police protection services involved with warehouse uses include after-hours patrol. Potential impacts would take the form of a need for expanded police protection services routinely associated with industrial growth, including routine patrols, responding to calls for service such as graffiti or vandalism, robbery, etc. In addition, commercial enforcement will be needed on surrounding streets. The number of additional service calls and call response times would slowly increase, and overall service levels would decrease incrementally as more warehouse buildings were built on the project site. The proposed warehouse uses would generate new employment opportunities. The new jobs that would be created by the proposed project would probably not induce substantial population growth within the City, because most of the new jobs would either be filled by residents of the City and surrounding areas or transfer from existing jobs to the project site for existing warehousing that relocates to the WLC project site.

In his July 10 letter, the City Police Chief concluded that buildout of the WLC project would create a need for 15 full-time sworn officers, 4 classified staff, 2,635 square feet of new police building area, 11 police vehicles, and 24 more secured parking spaces. The Chief also concluded buildout of the WLC project would generate a need for two additional commercial enforcement vehicles and all the

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related equipment, the addition of two full-time sworn commercial enforcement police officers, and training for those officers.

According to the 2004 City of Moreno Valley Community and Economic Profile, a majority of funding for police protection services is funded through sales tax revenue. In addition, the project will be subject to all applicable impact fees at the time specific development is proposed.

The City collects fees from developers to offset police-related service impacts associated with new development. These development impact fees (DIFs) are one-time charges applied to new development and are imposed to raise revenue for the construction or expansion of capital facilities. DIFs enable the City to collect fair-share fees from new development projects to fund new infrastructure and services. In the City, developers are also required to pay development fees per square foot of development to offset impacts associated with increased demand on law enforcement services. DIFs are collected for specific infrastructure needs and are deposited into different accounts representing these requirements. The proposed project would be designed and operated per applicable standards required by the City for new development in regard to public safety. In addition, the project would be required to pay development fees used to fund capital costs associated with constructing new public safety structures and purchasing equipment for new public safety structures.

The proposed WLCSP project will result in an increased need for police services as the project builds out. Serving the WLCSP project would initially require additional patrol and service time from existing staff, but would require additional personnel and/or equipment as new development is added.

Building security is a critical component of contemporary logistics facility design. Site design features routinely include restricted vehicular and pedestrian access, perimeter fencing and walls, and full-coverage cameras and monitoring systems. Tenants typically employ full-time security personnel and sophisticated internal security and monitoring systems. Facilities that operate as “Free Trade Zones,” as established by the U.S. Customs Service, are required to install and maintain extensive internal and external security facilities and systems.

General Plan and Municipal Code Consistency. Table 4.14.A evaluates whether the proposed project is consistent with the City’s General Plan policies and Municipal Code requirements relative to police service

NOTE: The following analysis was added to the table in response to Comment F-13-32 in Letter F-13 from the Sierra Club et al.

Table 4.14.A: Project Consistency with General Plan Policies and Municipal Code Requirements for Police Service

General Plan Policies	Project Consistency
Ultimate Goals	
<p>VII Emphasizes public health and safety, including, but not limited to, police, fire, emergency and animal services and protection from floods and other hazards.</p>	<p>Consistent. The project will be consistent with this goal regarding public services by providing future sites and/or facilities for fire and police facilities as development occurs. The project will also protect onsite and offsite uses from flooding and other hazards. The revised air quality study indicates the project will not result in significant offsite health risks for adjacent land uses based on the SCAQMD ten in one million threshold for cancer risks.</p>

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Table 4.14.A: Project Consistency with General Plan Policies and Municipal Code Requirements for Police Service

General Plan Policies	Project Consistency
Community Design Element Policies	
2.13.1 Limit the amount of development to that which can be adequately served by public services and facilities, based upon current information concerning the capability of public services and facilities.	Consistent. Initial project construction can be accommodated by existing police service. As development continues, additional police facilities, equipment, and services will be needed within the project, and the project will provide DIF and property tax revenues to support these future needs.
2.14.3 Review development projects for their impacts on public services and facilities including, but not necessarily limited to, roadways, water, sewer, fire, police, parks, and libraries and require public services or facilities to be provided at the standards outlined in the Moreno Valley General Plan and the standards of applicable service agencies.	Consistent. This EIR provides information on the potential impacts of the project on City services and facilities, including police. As development occurs within the project, additional police facilities, equipment, and services will be needed within the project, and the project will provide DIF and property tax revenues to support these future needs.
Safety Element Policies	
6.8.1 Explore the most effective and economical means of providing responsive and adequate law enforcement protection in the future.	Consistent. This EIR provides information on the potential impacts of the project on City services and facilities, including police. As development occurs within the project, additional police facilities, equipment, and services will be needed within the project, and the project will provide DIF and property tax revenues to support these future needs.
6.9.2 Require well-lighted entrances, walkways and parking lots, street lighting in all commercial, industrial areas and multiple-family residential areas to facilitate nighttime surveillance and discourage crime.	Consistent. The Specific Plan provides site and building lighting guidelines for future development to discourage crime. In addition, many of the on-site uses will have gated access and private security, reducing the need for additional City police services.
6.9.3 Incorporate “defensible space” concepts into the design of dwellings and nonresidential structures, including, but not limited to configuration of lots, buildings, fences, walls and other features that facilitate surveillance and reinforce a sense of territorial control.	Consistent. The Specific Plan provides site and building design guidelines, including fencing and walls, lighting, security cameras, to discourage crime. In addition, many of the uses will have gated access and private security, reducing the need for additional City police services.
6.11.1 Respond to any disaster situation in the City to provide necessary initial response and providing for key support to major incidents.	Consistent. Development according to the Specific Plan will allow full emergency access to this portion of the City as new buildings are constructed.
6.12.1 Support mutual aid agreements and communication links with the County of Riverside and other local participating jurisdictions.	Consistent. Development according to the Specific Plan will allow regional emergency access to this portion of the City from SR-60 and Gilman Springs Road.

Table 4.14.A: Project Consistency with General Plan Policies and Municipal Code Requirements for Police Service

General Plan Policies	Project Consistency
City of Moreno Valley Municipal Code	
Pursuant to Moreno Valley Municipal Code Section 3.42.070, the proposed project is subject to Police Facilities Commercial and Industrial Development Impact Fees. These fees contribute to the police services facilities provided for in the Existing General Plan area and Capital Improvement Projects. The fees provide financing for the acquisition of land for police and fire facilities as well as design, construction, improvements, and maintenance to the extent permitted by law.	Consistent. All development within the Specific Plan will pay applicable Development Impact Fees to the City.

The proposed project is consistent with the City General Plan policies and Municipal Code requirements relative to police services.

The WLCSP requires building and site design characteristics that specifically support police services by encouraging buildings that are safe and can be secured by design, fencing, security services, etc. The proposed WLCSP design guidelines are consistent with the goals of the General Plan relative to police protection and site design, as outlined in Section 4.14.1.2. In addition, future development within the WLCSP will be required to comply with the City’s Development Impact Fee (DIF) requirements as new development is constructed. It is anticipated that DIF revenues will help fund additional equipment needs and increased property taxes would help fund increased service or staffing needs. Therefore, the project will have less than significant impacts relative to police service, and no mitigation is required.

4.14.1.6 Significant Impacts

Based on the analysis in Section 4.14.1.5, the project will have no significant impacts relative to police protection.

4.14.2 Fire Protection

4.14.2.1 Existing Setting

The following information is based in part on a letter from the City Fire Chief dated June 27, 2012. The City of Moreno Valley Fire Department (MVFD) contracts with the Riverside County Fire Department (RCFD) to provide fire protection, fire prevention, and emergency services. The RCFD is administered and operated by the California Department of Forestry and Fire Protection (CalFire). Within the City, the objective of the MVFD is to have an engine company arrive on the scene of a fire or emergency medical aid situation within four minutes of a notification (i.e., dispatch) 90 percent of the time and a complete first alarm assignment within eight minutes¹ 90 percent of the time. Moreno Valley is served by six fire stations and a one-minute preparation time plus a four-minute travel time to fire incidents and emergency medical aid calls (90% of the time) is considered to be the maximum time standard for serving urban and suburban uses in accordance with the National Fire Protection Association (NFPA) 1710 standard. The City requires any new developments to provide adequate fire suppression water flows. The MVFD responds to medical aid calls with advance life support services.

¹ Station assigned to respond after first responder assesses situation.

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The MVFD participates in the Regionalized Cooperative Fire Protection Delivery System of Riverside County Fire/CalFire. This system ensures that the closest and most appropriate resources are dispatched to all requests for fire department emergency services regardless of jurisdiction.

The MVFD main office is located in the City PSB at 22850 Calle San Juan De Los Lagos in Moreno Valley. The MVFD occupies 1,100 square feet or 2 percent of the 45,900-square foot PSB, plus parking in the PSB secured lot. The City Police Chief has indicated the PSB and parking lot are already at or near full capacity at this time, so it is assumed this conclusion also applies to the Fire Department as well.

The City of Moreno Valley has six existing fire stations and one proposed fire station within the City limits as summarized in Table 4.14.B. Fire Station 58, Moreno Beach Station, is located at 28040 Eucalyptus Avenue and is the closest station to the project site. This station is approximately 1.25 miles northwest of the western limits of project site. The station is staffed on a 24/7 basis by three firefighters, one engine, one reserve aerial ladder truck, and a rescue squad.

Municipal Code Section 3.42.060 provides for the collection of Fire Facilities Commercial and Industrial DIFs and states that these fees shall be paid by applicants for commercial and industrial projects prior to the issuance of applicable building or occupancy permits.

NOP/Scoping Comments. During the NOP period, a comment was made about a future fire station planned at Redlands Boulevard/Brodiaea Avenue. Fire Chief Abdul R. Ahmad’s letter (June 27, 2012) cites potential fire danger from the proposed project being within both a high fire risk category and a non-fire high hazard risk category from building types, from emergency incidents (both fire and non-fire) during construction of the various phases of the proposed project, and from being partially within a State-designated Very High Fire Hazard Severity Zone.

Table 4.14.B: Moreno Valley Fire Stations

Fire Station	Address	Personnel	Equipment
Station 2 (Sunnymead)	24935 Hemlock Avenue	7 Firefighters	1 Engine 1 Aerial Ladder Truck (100 foot) 1 Urban Search and Rescue Trailer
Station 6 (Towngate)	22250 Eucalyptus Avenue	3 Firefighters	1 Engine 1 Reserve Engine
Station 48 (Sunnymead Ranch)	10511 Village Road	3 Firefighters	1 Engine 1 Reserve Engine
Station 65 (Kennedy Park)	15111 Indian Street	3 Firefighters	1 Engine 1 Reserve Engine
Station 58 (Moreno Beach)	28040 Eucalyptus Avenue	3 Firefighters	1 Engine 1 Reserve Aerial Ladder Truck 1 Rescue Squad
Station 91 (College Park)	16110 Lasselle Street	7 Firefighters	1 Engine 1 Rescue Squad 1 Aerial Ladder Truck (75 foot)
Station 99 (Morrison Park) <i>Opened October 2012</i>	13400 Morrison Street	3 Firefighters	1 Engine

Source: Table 5.13-1 City of Moreno Valley General Plan Final EIR, July 2006; Moreno Valley Fire Department, 2012.

4.14.2.2 Existing Policies and Regulations

The City of Moreno Valley has developed policies and regulations in order to direct future activities and decisions in order to achieve the goals and objectives set forth in the City's General Plan and Municipal Code.

Community Design Element Policies

- 2.13.1 Limit the amount of development to that which can be adequately served by public services and facilities, based upon current information concerning the capability of public services and facilities.
- 2.14.3 Review development projects for their impacts on public services and facilities including, but not necessarily limited to, roadways, water, sewer, fire, police, parks, and libraries and require public services or facilities to be provided at the standards outlined in the Moreno Valley General Plan and the standards of applicable service agencies.

Safety Element Policies

- 6.11.1 Respond to any disaster situation in the City to provide necessary initial response and providing for key support to major incidents.
- 6.12.1 Support mutual aid agreements and communication links with the County of Riverside and other local participating jurisdictions.
- 6.13.1 Provide fire safety education to residents of appropriate age.
- 6.14.2 Relate the timing of fire station construction to the rise of service demand in surrounding areas.
- 6.15.1 Encourage programs to minimize the fire hazard, including but not limited to the prevention of fuel build-up where wildland areas are adjacent to urban development.
- 6.15.2 Tailor fire prevention measures implemented in wildland areas to both the aesthetic and functional needs of the natural environment.
- 6.16.1 Ensure that ordinances, resolutions and policies relating to urban development are consistent with the requirements of acceptable fire safety, including requirements for smoke detectors, emergency water supply and automatic fire sprinkler systems.
- 6.16.2 Encourage the systematic mitigation of existing fire hazards related to urban land development or patterns of urban development as they are identified and as resources permit.
- 6.16.3 Ensure that adequate emergency ingress and egress is provided for each development.

City of Moreno Valley Municipal Code. Municipal Code Section 3.42.060 provides for the collection of Fire Facilities and Commercial and Industrial Development Impact Fees and states that fees shall be paid by applicants for commercial and industrial projects prior to the issuance of applicable building or occupancy permits.

4.14.2.3 Methodology

Based on discussion with City staff and previous environmental documents prepared by the City, the evaluation of fire service impacts associated with the proposed project includes the following:

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- Determine the existing fire response time for the City based on Moreno Valley Fire Department goals identified in the Moreno Valley Fire Department Strategic Plan 2012–2022;¹
- Determine the length of time for fire services to arrive at the project site based on average travel time;
- Compare existing fire response time and potential fire response time; and
- Determine the funding mechanism for future fire services and facilities.

Fire service funding impacts were evaluated by estimating compliance with local and RCFD goals and policies as indicated in the Moreno Valley Fire Department Strategic Plan 2012–2022. Response time impacts were evaluated by comparing existing and anticipated average responses with MVFD response time goals.

4.14.2.4 Threshold of Significance

Based on Appendix G of the *CEQA Guidelines*, impacts to fire protection services would be considered significant if the following condition resulted from the construction or operation of the proposed project:

- Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services.

4.14.2.5 Less than Significant Impacts

Threshold	Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered fire-fighting facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire services?
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The majority of the project site is currently undeveloped. The development and operation of the proposed project would increase the demand for fire protection, prevention, and emergency medical services. Time is the critical component in fire/medical emergencies. Reductions in the emergency response time or the distance between fire/medical facilities and the site of an emergency would result in improved service and saved lives and property.

Construction materials for the proposed warehouse buildings would likely be reinforced concrete and steel. Although fire occurring during the construction period for such buildings is rare, when they do occur they tend to be catastrophic due to a lack of completed fire protection and detection systems and the presence of considerable amounts of combustible materials that are normally on site during the construction phases. California Fire Code Section 8704 establishes fire safety standards for sites during the construction phase. All on-site construction as well as the use and storage of construction materials is required to conform to fire prevention/protection standards established by the RCFD, MVFD, and/or the City, which mirror standards prescribed in the California Fire Code. Adherence to safety standards required for sites during the construction phase established by the MVFD and/or the City would ensure that potential impacts during construction remain less than significant. Since portions of the project site are located within a State-designated Very High Fire Hazard Severity Zone, development within these zones is required to implement special construction features set forth

¹ *Moreno Valley Fire Department Strategic Plan 2012–2022*, Moreno Valley Fire Department, December 2011.

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in Chapter 7A of the California Building Code (CBC). Adherence to these specific requirements would ensure that potential impacts during construction remain less than significant.

All new development within the proposed project would be required to pay DIFs to the City. These fees are determined by the City Council, in consultation with the Fire Prevention Bureau, based on an assessment of the activity occurring within the City as well as the needs of the City. Such fees would be used to fund capital costs associated with land acquisition, construction, purchasing equipment, and providing for additional staff.

The proposed project will require that fire services be extended to the project site. In consultation with the MVFD through a letter dated June 27, 2012, submitted by Fire Chief Ahmad, the MVFD has identified that the estimated travel time from Fire Station 58 (the closest station to the project site) to the middle of the project site would exceed the NFPA 1710 standard for fire response time in the event of an emergency incident. Additionally, the MVFD identifies that buildings under construction are susceptible to fire and are likely to have a high rate of fire spread due to the absence of fire protection systems, fire detection systems, and fire protection features. Buildings under construction also lack compartmentalization of the interior to slow the rate of fire spread. The MVFD letter also notes that Fire Station 99 is expected to open in October of 2012;¹ however, the opening of an additional fire station would still result in service levels at the project site being below the NFPA 1710 standard.

The proposed project would increase the need for fire services and would potentially affect the MVFD's ability to maintain current service levels within the City. Additional service would be needed in the form of new facilities, personnel, and/or equipment. The City of Moreno Valley does not set a ratio of personnel per population, nor does it set equipment and staffing levels; rather, additional personnel and equipment are based on assessment of the activity occurring in the City, including but not limited to, calls for service and response times in order to meet or exceed the NFPA 1710 standard, the California Fire Code, and City Municipal Code Amendments. According to the 2004 City of Moreno Valley Community and Economic Profile, a majority of funding for fire protection services is from sales tax revenue. The project will be subject to all applicable development impact fees.

In his June 27, 2012, letter, the Fire Chief indicated the Fire Department would require "construction of a fire station during the first phase of this project. The fire station shall be located on 1.5 acres of land and the facility shall be approximately 11,000 square feet in size. This location shall be identified by the Fire Chief prior to the approval of the specific plan for the World Logistics Center. Initially, this station will require the purchase of an aerial ladder truck, which will be staffed daily by four Fire Department personnel for a total of twelve personnel to provide seven-day-a-week, twenty-four-hour-a-day coverage of the aerial ladder truck. During the final phase of construction, the Fire Department will require an additional fire apparatus to be purchased and staffed. This shall consist of a fire engine with a daily staffing of three Fire Department personnel for a total of nine personnel to provide seven-day-a-week, twenty-four-hour-a-day coverage."

As previously described, the proposed project would be designed, constructed, and operated per applicable fire prevention/protection standards established by the City. Such requirements include (but shall not be limited to) provisions for smoke alarms; sprinklers; building and emergency access; adequate emergency notification; and hydrant sizing, pressure, and siting. Due to the size and nature of the project and the potential for increased emergency incidents resulting from increased development and truck traffic will increase as development occurs, but payment of DIF fees and increased property taxes will offset increased service costs for this type of project. In addition, the Section 2.2.6 of the WLC Specific Plan indicates a future 1.5-acre urban fire station site will be dedicated to the City to help offset increased fire service needs. With these provisions, the proposed project will have a less than significant impact on fire services.

¹ Fire Station 99 (Morrison Park) opened in October 2012.

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General Plan and Municipal Code Consistency. Table 4.14.C evaluates whether the proposed project is consistent with the City’s General Plan policies and Municipal Code requirements relative to fire service.

Table 4.14.C: Project Consistency with General Plan Policies and Municipal Code Requirements for Fire Service

General Plan Policies		Project Consistency
Community Design Element Policies		
2.13.1	Limit the amount of development to that which can be adequately served by public services and facilities, based upon current information concerning the capability of public services and facilities.	Consistent. Initial project construction can be accommodated by existing fire protection service. As development continues, the WLCSP provides a future fire station site, and the project will provide DIF fees and increased property taxes to compensate for future fire service needs.
2.14.3	Review development projects for their impacts on public services and facilities including, but not necessarily limited to, roadways, water, sewer, fire, police, parks, and libraries and require public services or facilities to be provided at the standards outlined in the Moreno Valley General Plan and the standards of applicable service agencies.	Consistent. This EIR provides information on the potential impacts of the project on City services and facilities, including fire protection. As development occurs, the WLCSP provides a future fire station site, and the project will provide DIF fees and increased property taxes to compensate for future fire service needs.
Safety Element Policies		
6.11.1	Respond to any disaster situation in the City to provide necessary initial response and providing for key support to major incidents.	Consistent. Development according to the Specific Plan will allow emergency access to this portion of the City as new industrial warehouses are constructed.
6.12.1	Support mutual aid agreements and communication links with the County of Riverside and other local participating jurisdictions.	Consistent. Development according to the Specific Plan will allow regional emergency access to this portion of the City from SR-60 and Gilman Springs Road.
6.13.1	Provide fire safety education to residents of appropriate age.	Consistent. The project is for industrial warehouses and this policy generally applies to residential uses; however, warehouse operators will provide fire safety instruction and information to employees as encouraged by the Fire Department.
6.14.2	Relate the timing of fire station construction to the rise of service demand in surrounding areas.	Consistent. Initial project construction can be accommodated by existing fire protection service. As development continues, the WLCSP provides a future fire station site, and the project will provide DIF fees and increased property taxes to compensate for future fire service needs.
6.15.1	Encourage programs to minimize the fire hazard, including but not limited to the prevention of fuel build-up where wildland areas are adjacent to urban development.	Consistent. The Specific Plan provides site and building lighting guidelines for future development to discourage crime. Landscape palettes designed to reflect fuel modification criteria in wildland areas.
6.15.2	Tailor fire prevention measures implemented in wildland areas to both the aesthetic and functional needs of the natural environment.	Consistent. A portion of the project is in a High Fire Hazard Severity Zone and special construction features of the California Building Code will apply.

Table 4.14.C: Project Consistency with General Plan Policies and Municipal Code Requirements for Fire Service

General Plan Policies	Project Consistency
6.16.1 Ensure that ordinances, resolutions and policies relating to urban development are consistent with the requirements of acceptable fire safety, including requirements for smoke detectors, emergency water supply and automatic fire sprinkler systems.	Consistent. Future development will be required to comply with applicable fire protection requirements of the California Building Code.
6.16.2 Encourage the systematic mitigation of existing fire hazards related to urban land development or patterns of urban development as they are identified and as resources permit.	Consistent. Future warehouse development will have fire access lanes, building sprinkler systems and other fire suppression equipment and personnel to minimize fire-related risks.
6.16.3 Ensure that adequate emergency ingress and egress is provided for each development.	Consistent. Development according to the Specific Plan will allow emergency access to this portion of the City as new industrial warehouses and roadways are constructed.
City of Moreno Valley Municipal Code	
Pursuant to Moreno Valley Municipal Code section 3.42.060, Fire Facilities and Commercial and Industrial Development Impact Fees, states that fees shall be paid by applicants for commercial and industrial projects in the amounts adopted by the City Council by resolution from time to time. Neither building permit nor occupancy permit will be issued for any new commercial, industrial, or other non-residential building or structure unless the specified fees are paid.	Consistent. Future development within the Specific Plan will pay applicable Development Impact Fees to the City for fire-related services.

The proposed project is consistent with the City General Plan policies and Municipal Code requirements relative to fire protection services.

NOTE: The following information was added as a result of revisions to the WLC Specific Plan.

The WLCSP will dedicate a new 1.5-acre urban fire station site within its boundaries to allow for expansion of fire protection services as the project develops (see WLCSP Section 2.2.4). The revised WLCSP indicates the new fire station will be at the north end of Planning Area 11, and it is required to be built during Phase I. Placement of the fire station is subject to review and approval by the Fire Chief (WLCSP Section 2.2.4 First Station Site). The WLCSP also requires building and site design characteristics that specifically support fire services by encouraging buildings that are safe and can be secured by design, fencing, security services, etc. The proposed WLCSP design guidelines are consistent with the goals of the General Plan relative to fire protection and site design, as outlined in Section 4.14.2.2. Finally, future development within the WLCSP will be required to comply with the City's DIF requirements as new development is constructed. Therefore, the project will have less than significant impacts relative to fire protection service, and no mitigation is required.

4.14.2.6 Significant Impacts

Based on the analysis in Section 4.14.2.5, the project will have no significant impacts relative to fire protection.

4.14.3 Schools

4.14.3.1 Existing Setting

The project area is served by two school districts, the Moreno Valley Unified School District (MVUSD) and the San Jacinto Unified School District (SJUSD) and is home to the Moreno Valley campus of Riverside Community College (RCC). The MVUSD operates a total of 30 schools; 20 elementary, six middle, and four high schools. The SJUSD encompasses the far southeastern portion of the proposed project site (approximately 30 acres) and operates seven elementary schools, three middle schools, and two high schools.

NOP/Scoping Process. A number of residents were concerned about the WLC project only bringing in a small number of blue collar workers in a limited field (logistics warehousing), and that it would not help diversity or benefit to the workforce of the City (or their level of education) as a whole.

4.14.3.2 Existing Policies and Regulations

The City of Moreno Valley has developed policies and regulations in order to direct future activities and decisions in order to achieve the goals and objectives set forth in the City's General Plan and Municipal Code.

Community Design Element Policies

- 2.13.1 Limit the amount of development to that which can be adequately served by public services and facilities, based upon current information concerning the capability of public services and facilities.
- 2.14.3 Review development projects for their impacts on public services and facilities including, but not necessarily limited to, roadways, water, sewer, fire, police, parks, and libraries and require public services or facilities to be provided at the standards outlined in the Moreno Valley General Plan and the standards of applicable service agencies.

City of Moreno Valley Municipal Code. The proposed project will be located mainly within the MVUSD with a small part in SJUSD. These school districts currently impose fees of \$0.51 and \$0.47, respectively, per square foot on new industrial construction to offset the cost of providing new school facilities. The proposed project will be subject to these fees at the time of building permit issuance. However, no homes and no significant generation of school-aged children would be developed as part of the proposed project.

4.14.3.3 Methodology

Evaluation of school service impacts associated with the proposed project includes the following:

- Potential for student generation of the project in ways that would have direct or indirect impacts on local school districts;
- Cause other indirect educational impacts; and
- Cause negative impacts on existing or future school facilities or programs.

School impacts were evaluated by estimating compliance with local school district impact fee programs.

4.14.3.4 Thresholds of Significance

According to Appendix G of the *CEQA Guidelines*, a project would have a significant impact to schools if it would result in:

- Substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives.

4.14.3.5 Less than Significant Impacts

Threshold	Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
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Section 4.13.5.1 indicates the project is expected to generate from 15,000 to 25,000 new jobs for the City and surrounding areas; however, it is speculative to estimate how many of those workers will actually live within the City and how many will commute from other areas. Although the exact number is speculative, any increase is not expected to be substantial and will not generate significant new demands related to need for new or altered school facilities. The project is an industrial project and not a residential project that would have a direct impact on school services by accommodating additional residents within the City. Construction of the proposed project will create short-term construction jobs. These short-term positions are anticipated to be filled by workers who, for the most part, reside in the project area; therefore, construction of the proposed project will not generate a permanent increase in population within the project area.

California Government Code (§65995[b]) establishes the base amount of allowable developer fees imposed by school districts. These base amounts are commonly referred to as “Level 1 fees” and are subject to inflation adjustment every two years. School districts are placed into a specific “level” based on school impact fee amounts that are imposed on the development.

Unlike residential development, where it is possible to ascertain impacts to a particular school or school district, because employees at a warehouse facility could reside in any number of school districts with their children attending a collection of schools, it is difficult to determine with any level of certainty what the potential impacts to a particular school or school district would be.

The project site is located within the jurisdictional boundaries of the MVUSD and SJUSD. The MVUSD imposes development fees of \$0.51 per square foot of industrial development.¹ The SJUSD imposes development fees of \$0.47 per square foot of industrial development.² These development fees are equal to the minimum fee established by the State (Level 1 fees). Per California Government Code (§ 65995[h]), “The payment or satisfaction of a fee, charge, or other requirement levied or imposed ... are hereby deemed to be full and complete mitigation of the impacts ... on the provision of adequate school facilities.”

It is anticipated that most of the new employment opportunities generated by the proposed project will be filled by persons already residing in the community and surrounding areas. Because employees of the proposed on-site uses would be drawn from the local area, no substantial increase in population

¹ *School Developer Impact Fees*, Moreno Unified School District, 2012. http://www.mvUSD.net/apps/pages/index.jsp?uREC_ID=24969&type=d&pREC_ID=55535, accessed April 16, 2012.
² <http://www.sanjacinto.k12.ca.us/districtPages/facilities/developerInfo.html>, website accessed April 16, 2012.

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or corresponding increase in students attending local schools will occur. In addition, the project proponent would be required to pay these development fees in accordance with Government Code 65995 and Education Code 17620.

The proposed project contains no residential development, so it would not cause a significant increase in the local population that would increase the number of students attending local schools (see Section 4.13, *Population and Housing*). Since payment of the school impact fees is required of all projects within MVUSD and SJUSD boundaries, impacts to school services and facilities would not occur. The WLC project is also consistent with the applicable General Plan policies in Section 4.13.3.2 as it will assist in the provision of adequate school facilities by providing legally required DIFs. Accordingly, impacts to the environment resulting from new or expanded school facilities would not occur, resulting in a less than significant impact and no mitigation is required.

General Plan and Municipal Code Consistency. Table 4.14.D evaluates whether the proposed project is consistent with the City’s General Plan policies and Municipal Code requirements relative to school services.

Table 4.14.D: Project Consistency with General Plan Policies and Municipal Code Requirements for School Services

General Plan Policies	Project Consistency
Community Design Element Policies	
2.13.1 Limit the amount of development to that which can be adequately served by public services and facilities, based upon current information concerning the capability of public services and facilities.	Consistent. The proposed project consists of logistics warehousing and supporting uses and does not propose any residential uses that would add housing units or substantial numbers of new students to local schools.
2.14.3 Review development projects for their impacts on public services and facilities including, but not necessarily limited to, roadways, water, sewer, fire, police, parks, and libraries and require public services or facilities to be provided at the standards outlined in the Moreno Valley General Plan and the standards of applicable service agencies.	Consistent. This EIR provides information on the potential impacts of the project on City services and facilities, including schools.
City of Moreno Valley Municipal Code	
The proposed project will be located mainly within the MVUSD with a small part in SJUSD which currently impose fees of \$0.51 and \$0.47, respectively, per square foot on new industrial construction to offset the cost of providing new school facilities. The proposed project will be subject to these fees at the time of building permit issuance. However, no homes and no significant generation of school-aged children would be developed as part of the proposed project.	Consistent. Future development within the Specific Plan will pay applicable School Impact Fees for non-residential uses.

The proposed project is consistent with the City General Plan policies and Municipal Code requirements relative to school services. In addition, future development within the WLCSP will be required to comply with the City’s DIF requirements as new development is constructed. Therefore, the project will have less than significant impacts relative to schools, and no mitigation is required.

4.14.3.6 Significant Impacts

Based on the analysis in Section 4.14.3.5, the proposed project will not produce any significant school-related impacts, so no mitigation is required.

4.14.4 Parks, Recreation, and Trails

4.14.4.1 Existing Setting

The Moreno Valley Parks and Community Services Department (Department) maintains over 358 acres of parks and park facilities, and 10 miles of trails. See Figure 4.14.1 for De Anza Trail in the surrounding area. The Department also maintains and operates 39 parks and facilities; including senior recreation centers and conference centers as well as 20 lighted sports fields and lighted sports fields at three schools. The nearest park to the project site is Ridgecrest Park located on John F. Kennedy Drive less than a mile southwest of the project site.

Open space land can be classified into lands for preservation of natural resources (e.g., wildlife habitat), production of resources (e.g., farming), public health and safety (e.g., floodplains), low-density residential development, and outdoor recreation (e.g., parks). Open space for outdoor recreation includes public and private outdoor recreation facilities. Public recreation facilities in Moreno Valley include State, County, and City parks as well as public golf courses. Private outdoor recreation facilities include private golf courses, driving ranges, and other private outdoor recreation facilities. Two private outdoor recreation facilities are owned and operated by homeowner's associations in Sunnymead Ranch and Moreno Valley Ranch.

A large amount of the City's open space lands is managed for the preservation of natural resources. These areas include the Box Springs Mountain Reserve, the San Timoteo Canyon Park property, the Lake Perris State Recreation Area, and the San Jacinto Wildlife Area. These areas are also used for hiking, horseback riding, fishing, boating, and other uses.

The Box Springs Mountain Reserve and the San Timoteo Canyon Park property are owned and operated by Riverside County Regional Park and Open Space District. They are primarily mountainous natural open space parks. The Box Springs Mountain Reserve is located at the northwest corner of Moreno Valley. The Reserve consists of three noncontiguous land areas, two of which are within the City's Sphere of Influence. San Timoteo Canyon Park property is located east of the City's Sphere of Influence along the north side of SR-60. Approximately 1,100 acres of the property, including the Badlands Landfill is jointly owned by the Regional Park and Open Space District and Riverside County Waste Management District.

Lake Perris State Recreation Area, located south of Moreno Valley, is approximately 8,000 acres. It contains a major reservoir, natural open space and facilities for boating and fishing, picnicking and camping. About 1,600 acres of the property were dedicated to the State of California as mitigation for loss of wildlife habitat due to development of the Moreno Valley Ranch Specific Plan. The Lake Perris State Recreation Area serves as one of several habitat reserves for the endangered Stephens' kangaroo rat (*Dipodomys stephensi*).

The San Jacinto Wildlife Area in the southeastern corner of the study area consists of gently sloping grasslands, sage scrub and natural and man-made wetlands that support migratory birds and resident wildlife. Bird watching and hunting are popular activities. Some of the adjoining property is owned by private organizations dedicated to hunting and wildlife conservation.

Several open space areas are located along soft-bottomed drainage courses within the planned communities of Sunnymead Ranch and Hidden Springs. The City also owns two natural open space areas. One open area is adjacent to the Moreno Valley Equestrian Center, located at the northeast corner of Redlands Boulevard and Locust Avenue. A second natural open space area is located north of Sunnymead Ranch Parkway, on the east side of Perris Boulevard.

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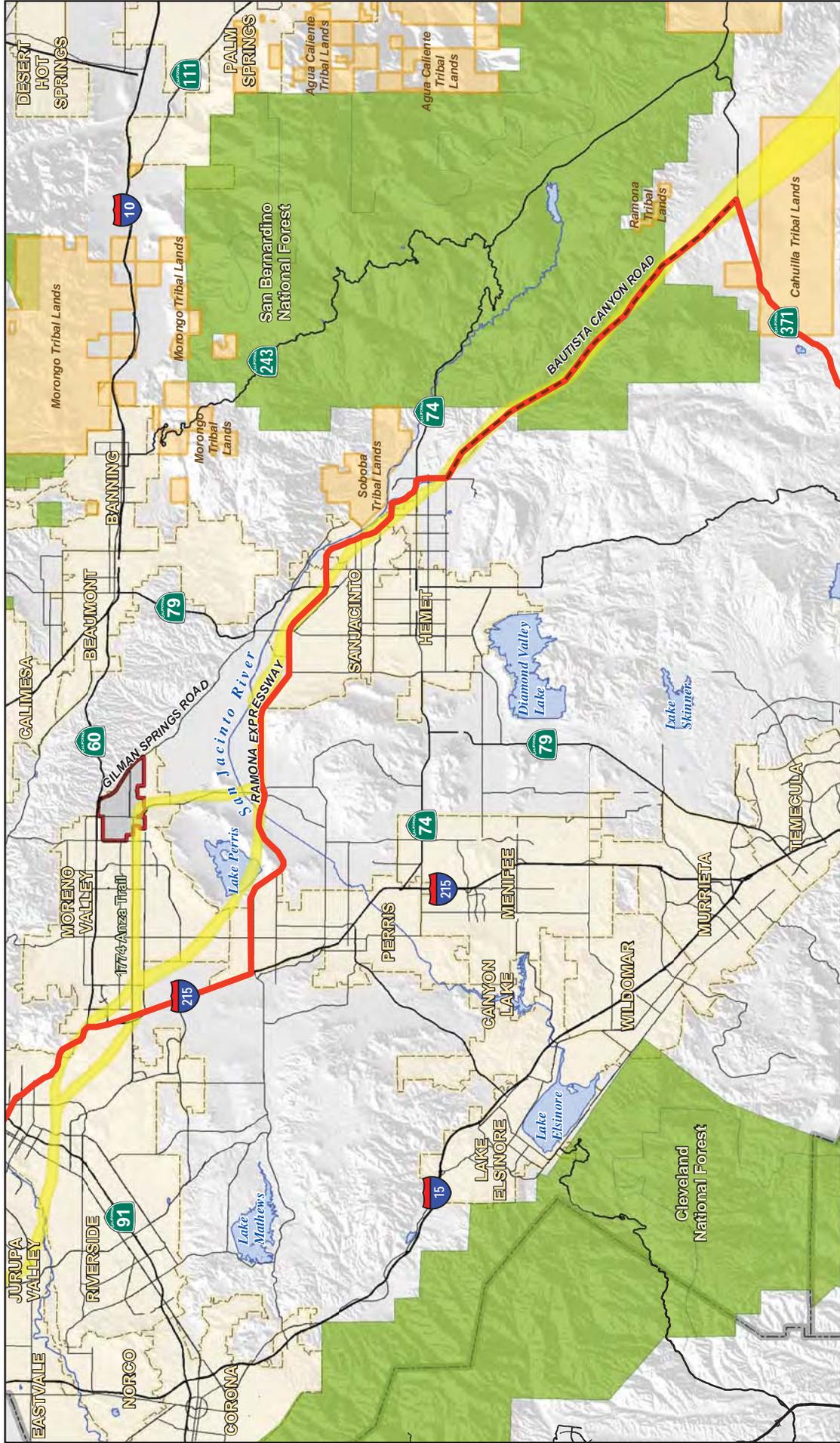


FIGURE 4.14.1

LSA

-  Project Location
-  Auto Tour Route
-  Recreational Trail
-  Historic Trail Corridor
-  Cities
-  Tribal Lands
-  National Forest

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Natural open space can also be found within the steeply sloping areas designated Rural Residential and Hillside Residential on the General Plan land use map. These areas contain wildlife habitat, watershed benefits and scenic values that can be conserved even as these areas are developed. Natural open space can be conserved because these areas are planned for low-density residential development. Low-density development requires a minimal amount of land disturbance.

The City's General Plan also discusses trail facilities. The City owns and maintains about 10 miles of developed trails. Multiuse trails are popular with the equestrian community. The Moreno Valley Equestrian Center, dedicated in 2003, provides additional facilities of interest to equestrians. This 45-acre park is located at the northeast corner of Redlands Boulevard and Locust Avenue. The park features equestrian facilities, including an arena, with bleachers, a water trough, night lighting and parking for horse trailers.

Multiuse trails should be designed with considerations for safety, accessibility, proper design and construction, signage and relative location. The City's trail network should also connect to the County and State regional trail systems.

There is one existing multiuse trail adjacent to the project limits, located along Redlands Boulevard and Cottonwood Avenue. There are several proposed trails shown on the current General Plan within the project area along Redlands Boulevard, Cottonwood Avenue, Brodiaea Avenue, Dracaea Avenue, Theodore Street, Fir Avenue, Sinclair Street, and Davis Road.

NOP/Scoping Comments. One written comment was received specifically about park impacts. The State requested that the WLCSP project not have any adverse impacts on the Lake Perris Recreational Area. In addition, at least one resident urged the City to provide an integrated network of trails that would connect to other trails planned in the region (e.g., Juan Bautista de Anza trail).

4.14.4.2 Policies and Regulations

a. State Regulations

Quimby Act (California Government Code 66477). This State policy requires the dedication of land and/or imposes a requirement of fees for park and recreational purposes as a condition of approval of tentative map or parcel map.

b. Local Regulations, City of Moreno Valley General Plan

Parks, Recreation and Open Space Element Policies

4.2.7 The City level of service standard is 3 acres of developed parkland for every 1,000 new residents. Exceptions from this ratio may be made in exchange for extraordinary amenities of comparable economic value. Land not suitable for active recreation purposes may not be counted toward fulfilling parkland dedication requirements.

4.2.8 Encourage the development of recreational facilities within private developments, with appropriate mechanisms to ensure that such facilities are properly maintained and that they remain available to residents in perpetuity.

4.2.17 Require new development to contribute to the park needs of the City.

4.3.1 The City's network of multiuse trails, including regional trails, community trails, and local feeder trails, shall (1) be integrated with recreational, residential and commercial areas, schools and equestrian centers; (2) provide access to community resources and facilities,

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- and (3) connect urban populations with passage to hillsides, ridgelines, and other scenic areas.
- 4.3.3 All new development approvals shall be contingent on trail right-of-way dedication and improvement in accordance with the Master Plan of Trails.
- 4.3.4 In conjunction with all development review, the City shall consider multiuse trail access and traditional travel routes through the property.
- 4.3.5 In conjunction with the review and approval of non-residential developments, the City should consider the use of multiuse trail amenities such as hitching posts, benches, rest areas, and drinking facilities.
- 4.3.7 Trail design and construction should take into consideration the safety and convenience of all trail users as the primary concern.
- 4.3.8 The City should facilitate the development of a multiuse regional trail system.
- 4.3.9 Unless otherwise specified due to fire department requirements, access or as established by a specific plan, city trails along roadways shall be ten (10) feet wide and shall be constructed with decomposed granite or equal material and shall provide appropriate fencing or other devices where needed to delineate trails from vehicular rights-of-way.
- 4.3.10 Where firefighting access is required, trails shall be 20' wide to meet the needs of the Fire Department and its equipment. Fire Department requirements shall be met in all conditions where access is required.
- 4.3.11 In unusual situations where legal or topographical barriers exist (e.g., excessive slope, the configuration of right-of-way, existing vegetation, etc.), the City shall have the discretion to amend the trail requirement as needed to accomplish the goals of this General Plan.
- 4.3.14 Where feasible, use drainage courses, utility rights-of-way and other such opportunities to incorporate trail and open space elements in the design of major development projects.

4.14.4.3 Methodology

The potential impacts of the proposed project on recreation and park resources were evaluated based on whether implementation of the proposed project could result in increased use of existing recreation and park resources, or whether implementation of the proposed project could necessitate the construction or expansion of recreation and park facilities.

4.14.4.4 Thresholds of Significance

The following thresholds of significance regarding potential impacts to recreational facilities and resources are based on questions contained in Appendix G of the *CEQA Guidelines*. The proposed project would result in a significant impact on recreation resources if any of the following occurs:

- The project increases the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and/or
- The project includes recreational facilities or requires the construction or expansion of recreational facilities that have an adverse physical effect on the environment.

4.14.4.5 Less than Significant Impacts

Threshold	Would the project result in increased use of existing neighborhood and regional parks or other recreational facilities (e.g., trails) where substantial physical deterioration would occur or be accelerated?
-----------	---

The WLC project proposes the development of a master-planned logistics center; no residential development is proposed. There is a potential for the proposed project to indirectly generate new residents in the City, although predicting the exact number would be too speculative. Increases in the City's population from future residential development will help fund new parks and trails through dedications of land and the payment of Development Impact Fees.

The WLCSP project proposes a General Plan Amendment to the Master Plan of Trails to reduce the extent of trail systems in the area to reflect the change from a residential neighborhood (Moreno Highlands) to a non-residential neighborhood (World Logistics Center). Trail linkages are provided in the WLC project to extend existing trail routes from the western edge of the project to the east, providing for future linkages to Gilman Springs Road, to the Lake Perris State Recreation Area, and to the San Jacinto Wildlife Area.

Implementation of these new trails and the General Plan Amendment (i.e., revised Master Plan of Trails) will allow the project to be consistent with the General Plan policies relative to trails (4.3.1 and 4.3.8).

General Plan and Municipal Code Consistency. Table 4.14.E evaluates whether the proposed project is consistent with the City's General Plan policies and Municipal Code requirements relative to parks, recreation, and open space:

Table 4.14.E: Project Consistency with General Plan Policies and Municipal Code Requirements for Parks, Recreation and Open Spaces

General Plan Policies	Project Consistency
Parks, Recreation and Open Space Element Policies	
4.2.7 The City level of service standard is 3 acres of developed parkland for every 1,000 new residents. Exceptions from this ratio may be made in exchange for extraordinary amenities of comparable economic value. Land not suitable for active recreation purposes may not be counted toward fulfilling parkland dedication requirements.	Not Applicable. The proposed project consists of logistics warehousing and supporting uses, and does not propose any residential uses that would add new housing units or residents who would use local parks.
4.2.8 Encourage the development of recreational facilities within private developments, with appropriate mechanisms to ensure that such facilities are properly maintained and that they remain available to residents in perpetuity.	<i>The following changes have been made due to revision to the Specific Plan project size.</i> Not Applicable. The proposed project does not generate a need for new active recreational facilities, so no maintenance costs will be involved. However, the project does provide 74.3 acres of Open Space in the southwestern corner of the site adjacent to Mount Russell to be dedicated to the City of Moreno Valley.

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Table 4.14.E: Project Consistency with General Plan Policies and Municipal Code Requirements for Parks, Recreation and Open Spaces

General Plan Policies	Project Consistency
4.2.17 Require new development to contribute to the park needs of the City.	<p><i>The following changes have been made due to revision to the Specific Plan project size.</i></p> <p>Not Applicable. The proposed project consists of logistics warehousing and supporting uses, and does not propose any residential uses that would add new housing units or residents who would use local parks. However, the project does provide 74.3 acres of Open Space in the southwestern corner of the site adjacent to Mount Russell.</p>
4.3.1 The City's network of multiuse trails, including regional trails, community trails, and local feeder trails, shall (1) be integrated with recreational, residential and commercial areas, schools and equestrian centers; (2) provide access to community resources and facilities, and (3) connect urban populations with passage to hillsides, ridgelines, and other scenic areas.	<p>Consistent. The Specific Plan proposes a trail along the southwestern portion of the site to tie into an existing trail along the west side of Redlands Boulevard and an existing trail west along Cactus Avenue. The project will also provide a trail connection from the southwest corner of the project around the Open Space area and a trailhead that will allow a future connection to the SJWA property that would be installed and maintained by the CDFW.</p>
4.3.3 All new development approvals shall be contingent on trail right-of-way dedication and improvement in accordance with the Master Plan of Trails.	<p>Consistent. The new trail and related improvements will be consistent with the City's requirements in this regard. The project entails a General Plan Amendment to modify the Master Plan of Trails consistent with the proposed Specific Plan trails.</p>
4.3.4 In conjunction with all development review, the City shall consider multiuse trail access and traditional travel routes through the property.	<p>Consistent. See discussion under Policy 4.3.1 above.</p>
4.3.5 In conjunction with the review and approval of non-residential developments, the City should consider the use of multiuse trail amenities such as hitching posts, benches, rest areas, and drinking facilities.	<p>Consistent. The new trail and related improvements will be consistent with the City's requirements in this regard.</p>
4.3.7 Trail design and construction should take into consideration the safety and convenience of all trail users as the primary concern.	<p>Consistent. The new trail and related improvements will be consistent with the City's requirements in this regard.</p>
4.3.8 The City should facilitate the development of a multiuse regional trail system.	<p>Consistent. The proposed trail connections within the Specific Plan would connect to existing regional trails to the west and future regional trails to the southeast through the SJWA property.</p>
4.3.9 Unless otherwise specified due to fire department requirements, access or as established by a specific plan, city trails along roadways shall be ten (10) feet wide and shall be constructed with decomposed granite or equal material and shall provide appropriate fencing or other devices where needed to delineate trails from vehicular rights-of-way.	<p>Consistent. The new trail and related improvements will be consistent with the City's requirements in this regard.</p>
4.3.10 Where firefighting access is required, trails shall be 20' wide to meet the needs of the Fire Department and its equipment. Fire Department requirements shall be met in all conditions where access is required.	<p>Consistent. The new trail and related improvements will be consistent with the City's requirements in this regard.</p>

Table 4.14.E: Project Consistency with General Plan Policies and Municipal Code Requirements for Parks, Recreation and Open Spaces

General Plan Policies	Project Consistency
4.3.11 In unusual situations where legal or topographical barriers exist (e.g., excessive slope, the configuration of right-of-way, existing vegetation, etc.), the City shall have the discretion to amend the trail requirement as needed to accomplish the goals of this General Plan.	Consistent. The new trail and related improvements will be consistent with the City's requirements in this regard.
4.3.14 Where feasible, use drainage courses, utility rights-of-way and other such opportunities to incorporate trail and open space elements in the design of major development projects.	Consistent. The proposed trails will allow for connections to existing and future trails as outlined in Policy 4.3.1 above.

The proposed project is consistent with the City General Plan policies relative to parks, recreation, and trails.

The WLCSP will provide connections to existing trails to the west and southwest, and a connection to and trailhead for a future planned trail in the San Jacinto Wildlife Area south of the site, as outlined in Specific Plan Section 3.4.2, *Multi-Use Trails*, and as shown on Figure 3-11 of the Specific Plan. In addition, future development within the WLCSP will pay applicable DIFs to offset any potential impacts to parks or recreational services. Based on this, the proposed project will not create significant impacts on parks, recreation, or trails.

Threshold	Would the project result in construction or expansion of recreational facilities that would have an adverse physical effect on the environment?
-----------	---

NOTE: The following changes have been made due to revision to the Specific Plan project size.

The WLC project proposes development of up to approximately 40.6 million square feet of high-cube logistics warehouse facilities. It does not include the construction or expansion of a recreational facility since it would not create any substantial demands on recreational facilities. Section 4.13.5 concluded that the project would have a less than significant impact on population or housing; therefore, no new demand on existing park facilities would occur, and no expansion of existing parks or the construction of new parks would be required.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

As noted in the Specific Plan, the project includes an Open Space (OS) designation covering 74.3 acres on the lower elevations of Mount Russell in the southwestern portion of the WLCSP project site.

4.14.4.6 Significant Impacts

The analysis in Section 4.14.4.5 determined that all impacts of the WLC project relative to parks and recreation are less than significant, therefore, no mitigation is required.

4.14.5 Cumulative Impacts

The cumulative areas for police and fire protection services are the service areas for the RCSD and RCFD. The need for the public services and associated facilities is measured by service area population, or the number of residents and workers within the City's service area. Service population, as well as the type and density of development, determines the need for new or expanded police and services. Utilizing statistical information, local planning policies, and by interacting with other agencies, fire and police service providers can delineate past patterns, emerging trends, and future issues of concern. Once identified, service providers can redeploy resources to meet future needs.

Sections 4.14.1.6 and 4.14.2.6 identified the possible need for new fire station within the WLC project. Payment of DIFs and provision of a new fire station site within the WLCSP is expected to fully mitigate potential impacts of the WLC project relative to fire services. In addition, payment of DIFs is expected to fully mitigate potential impacts of the WLC project relative to police services.

As additional development occurs in the City of Moreno Valley and region, there may be an overall increase in the demand for law enforcement and fire protection services, including personnel, equipment, and/or facilities. Increases in demand are routinely assessed by these agencies as part of the annual monitoring and budgeting process. New development within the service areas of the RCSD and RCFD would be required to adhere to conditions established by fire and police service providers, and pay applicable DIFs to ensure adequate staffing and equipment levels. Therefore, there would be no cumulative impact on police and fire services in the City. Accordingly, cumulative impacts to the environment resulting from new or expanded police and fire protection facilities would not occur, resulting in a less than significant impact and no mitigation is required.

The cumulative area for school-related issues encompasses the two school district(s) that provide school services/facilities in the project area. While no significant population increase is anticipated to result from the construction and operation of the proposed project, future development (particularly residential development) forecast in the City's General Plan will increase the demand for school facilities and services. New school facilities are currently being constructed to accommodate the growth in the local student population. Additionally, school districts are engaged in planning new facilities in anticipation of future local and regional growth. Each district requires the payment of development fees to provide for new school services and/or facilities. As every new development is mandated to provide the fees applicable to the school district affected, there would be no cumulative impact on school services in the City. Accordingly, cumulative impacts to the environment resulting from new or expanded school facilities would not occur, resulting in a less than significant impact and no mitigation is required.

Implementation of the proposed project will not increase the use of existing parks and recreation facilities. As future residential development is proposed, the City will require developers to provide the appropriate amount of parkland or payment of in-lieu fees, which will contribute to future recreational facilities. Payment of these fees and/or implementation of facilities on a project-by-project basis would offset cumulative parkland impacts by providing funding for new and/or renovated parks equipment and facilities. As such, the cumulative impact of buildout associated with the implementation of the proposed project, when considered with cumulative projects in the area, would be less than significant with implementation of the WLC project.

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NOTE TO READERS. *This section has been revised based on changes to the WLC Specific Plan, the project traffic study, and in response to comments on the original DEIR. Three street names have also changed (Street C now named Alessandro Boulevard, D now named Cactus Avenue, and E a portion of which is now named Alessandro Boulevard) and may still be referenced in the section. For correct street names see Circulation Master Plan Figure 3.10. In addition, Streets E and C have been realigned to follow the historical alignment of Alessandro Boulevard.*

Large amounts of text, tables, and/or graphics were removed or heavily modified from those in the original DEIR. The changed text is shown in underline/strikeout wherever possible. To maintain readability, however, some sections have notes that refer the reader to the original DEIR for the complete text, table, or graphic from the original DEIR.

4.15 TRAFFIC AND CIRCULATION

Revisions to this section have been made due to changes to the revised Traffic Impact Analysis (TIA) Report for the World Logistics Center prepared by Parsons Brinckerhoff and dated September 2014 (FEIR Volume 2, Appendix L-1). The vast majority of the changes to the TIA, and in turn replicated in the following Final EIR traffic section, are associated with:

- 1) Project Reduction. A reduction in the project area in the amount of 100 acres that occurred between the Draft EIR and this Final EIR. The reduced project area would result in a reduction in the proposed quantity of high-cube warehouse development in the WLC by one million square feet and an increase in the quantity of background (i.e., non-project related) development in year 2035 by 220 dwelling units. The area of land that was eliminated is located in the southwest corner of the previous WLC site that was analyzed in the previous TIA and Draft EIR.*
- 2) Baseline Plus Phase 1 Analysis. Added an Existing Plus Phase 1 (only) scenario that was added to the revised TIA and Final EIR, in order to provide a “baseline plus Phase 1 analysis.”*
- 3) Revised Project Schedule. A revision to the WLC implementation schedule so that Phase 1 is scheduled for completion in year 2022 as analyzed in the revised TIA and Final EIR, rather than in Year 2017 as analyzed in the previous TIA and Draft EIR. The scenarios for Year 2017 were revised to Year 2022 and include analysis of Phase 1 only and not full buildout of the WLC in the revised TIA and Final EIR, while the analysis of the previous Year 2022 scenarios were dropped from the revised TIA and Final EIR.*

Additional revisions to this section have been made due to comments received on the Draft EIR and previous TIA. In summary, these changes include:

- 4) Truck Trips to Ports of Los Angeles and Long Beach. Analysis of freeway impacts from WLC trucks was extended to the Ports of Los Angeles and Long Beach. The extended analysis, covering more than 60 additional centerline miles of freeway, did not find any new impacts that were not already identified in the Draft TIA (see TIA Chapter 12, Section F) and replicated in this Final EIR traffic section (see Section 4.15.6.5 of this Final EIR). These changes have been made in response to: Comment F-1-49 in Letter F-1 from the Center for Biological Diversity/San Bernardino Valley Audubon Society; Comment F-3-4 in Letter F-3 from the California Clean Energy Committee; Appendix 78 in Letter F-3 from the California Clean Energy Committee; Comment F-9A-22 in Letter F-9A from the Sierra Club, Center for Community Action & Environmental Justice, and Natural Resources Defense Council; Comments F-9C-2, 4, 5, 6, and 7 in Letter F-9C from Sustainable Systems Research, LLC; Comment F-11-23 in Letter F-11 from the Sierra Club, San Geronio Chapter; Comment F-*

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13-11 in Letter F-13 from the Sierra Club and Friends for a Livable Moreno Valley; and Comment G-51-45 in Letter G-51 from Michael McCoy.

- 5) *Rail Analysis.* Analysis of the feasibility of shipping cargos between the WLC and the Ports of Los Angeles and Long Beach by rail instead of by truck was added. The analysis found that this was not feasible for a variety of reasons, including the cost and environmental impacts of a new rail alignment, the high fixed handling costs for rail cargo that makes short hauls uneconomical, and system constraints with the rail system itself. This analysis is provided in the revised TIA (see TIA Chapter 4, Section F) and replicated in this Final EIR traffic section (see end of Section 4.15.3.2 of this Final EIR). These changes have been made in response to: Comments F-3-5, 11, and Appendix 176 in Letter F-3 from the California Clean Energy Committee; Comments F-6-1, 2, and 3 in Letter F-6 from the Endangered Habitats League; Comment F-9A-45 in Letter F-9A from the Sierra Club, Center for Community Action & Environmental Justice, and Natural Resources Defense Council; Comment F-9B-45 in Letter F-9B from Tom Brohard and Associates; Comment F-11-29 in Letter F-11 from the Sierra Club, San Geronio Chapter; Comment G-2-7 in Letter G-2 from Perry Johnson; Comment G-17-2 in Letter G-17 from Joanne Lindgren; Comment G-18-1 in Letter G-18 from Sam Zaidy; Comment G-34-5 in Letter G-34 from Lindsay Robinson; Comment G-35-4 in Letter G-35 from Peggy Hadaway and John Neal; Comment G-49-18 in Letter G-49 from Karen Jakpor; Comment G-50-2 in Letter G-50 from Ann McKibben; Comment G-51-5 in Letter G-51 from Michael McCoy; Comments G-52-1 and 2 in Letter G-52 from Steve Jiannino; Comment G-53-4 in Letter G-53 from Deanna Reader and Kenny Bell; Comment G-57-1 in Letter G-57 from Tracy Hodge; Comment G-68-3 in Letter G-68 from Craig and Joan Givens; Comment G-96-3 in Letter G-96 from Margie Breikreuz; and Comment G-97-1 in Letter G-97 from Otana Jakpor.
- 6) *Project Traffic Near Schools.* Analysis of the potential safety impacts of WLC traffic on local schools was added, including the new proposed high school #5 located north of SR-60. The traffic analysis for this proposed school can be found in the Tech Memo on High school # 5 Appendix L. The analysis found that the project would pose little safety risk and that appropriate safety features were already present on roads near local schools. This analysis is provided in the revised TIA (see TIA Chapter 12, Section B) and replicated in this Final EIR traffic section (see Section 4.15.5.2 of this Final EIR). These changes have been made in response to: Comment E-3-13 in Letter E-3 from the Moreno Valley Unified School District; Comment F-11-36 in Letter F-11 from the Sierra Club, San Geronio Chapter; and Comment G-96-4 in Letter G-96 from Margie Breikreuz.
- 7) *Additional Changes.* Additional changes have been made to the revised TIA and replicated in the Final EIR traffic section based on comments received on analytical details contained in the Draft EIR and/or previous TIA. These changes have been made in response to: Comments B-2-2 through B-2-14 in Comment Letter B-2 from the California Department of Transportation District 8; Comment B-5-12 in Letter B-5 from the California Air Resources Board; Comment C-3-17 in Letter C-3 from the South Coast Air Quality Management District; Comments E-2A-2 through E-2A-12 in Comment Letter 2A from the City of Riverside; Comments E-2B-1 through E-2B-23 in Appendix 1 to Comment Letter 2-A from the City of Riverside; Comment E-3-5 in Letter E-3 from the Moreno Valley Unified School District; Comments E-5-1 through E-5-5 in Comment Letter E-5 from the City of Redlands; Comments F-3-3, F-3-4, and F-3-6 to F-3-10 in Letter F-3 from the California Clean Energy Committee; Comments F-8-68 and F-8-69 in Comment Letter F-8 from Shute, Mihaly & Weinberger LLP; Comments F-9A-3 and F-9A-7 through F-9A-22 in Letter F-9A from the Sierra Club, Center for Community Action & Environmental Justice, and Natural Resources Defense Council; Comments F-9B-1 and F-9B-2, F-9B-4 through F-9B-47 in Letter F-9B from Tom Brohard and Associates; Comments F-13-9, F-13-26, and F-13-89 through F-13-98 in Letter F-13 from the Sierra Club and Friends for a Livable Moreno Valley; Comment G-17-1 in Letter G-17 from

Joanne Lindgren; Comments G-51-19, G-51-28 through G-51-30, G-51-47, and G-51-61 through G-51-65 in Letter G-51 from Michael McCoy; Comments G-57-5 through G-57-7 in Letter G-57 from Tracy Hodge; and Comments G-90-7 and G-90-14 in Letter G-90 from Mr. and Mrs. H.W. Wolterbeek.

Note: As a result of these various changes, the level of significance of traffic impacts has not changed in comparison to the Draft EIR. However, the following changes to individual roadway, intersection, and/or freeway impacts and the reason for these changes are as follows:

Intersections

Indian Street/Cactus Avenue (IN-64). Although this intersection exceeds the level of service standard in the Year 2035 Cumulative Plus Project analysis, the revised project does not increase the delay in comparison to the No Project condition. Consequently, no mitigation is required.

Ellsworth Street/Alessandro Boulevard (IN-71). Due to the reduction in the project size, this intersection does not exceed the level of service standard and therefore no longer requires mitigation.

Ellsworth Street/Cactus Avenue (IN-74). The Draft EIR TIA identified required mitigation for the Ellsworth Street/Cactus Avenue intersection (IN-74) in Table 69 (page 325). The mitigation included widening the northbound approach to provide three left-turn lanes, one through lane, and one right-turn lane, and adding a westbound left-turn lane and eastbound right-turn lane. This mitigation was inadvertently omitted from the mitigations chapter text and Table 80 in the Draft EIR TIA. This mitigation has been corrected in the Final EIR TIA and added to the mitigation discussion in the Final EIR.

Bridge Street/Ramona Expressway (IN-122). Mitigation for this intersection was included in the Draft EIR for project direct impacts (Existing Plus Project). Upon further review, it was determined that the mitigation was not warranted because the intersection will be eliminated and replaced by a grade separation. A discussion of this has been included in the Revised Draft EIR, however, the impact remains significant and unavoidable.

Roadway Segments

Theodore Street from SR-60 Westbound Ramps to Ironwood Avenue (S-1). Due to the reduction in the project size, this roadway segment does not exceed the level of service standard and therefore no longer requires mitigation.

Freeway Segments

Southbound I-215 from SR-74 to Ellis Avenue (F-71). In the Draft EIR, this freeway segment was listed as “I-215 SR-74/Case Road to Redlands Avenue” and shown as having an impact. In the Final EIR TIA, the segment where the level of service exceedance will occur (between SR-74 and Ellis Avenue) is listed as “I-215 SR-74 to Redlands Ave” in Table 76 for project direct impacts but as “I-215 SR-74 to Ellis Ave” in Table 79 for cumulative impacts. In each table, however, the same identification number (F-71) was used. In summary, this is not a new impact; as it was already identified in the Draft EIR. A footnote has been added to the Revised EIR as follows: “I-215 currently runs unbroken between SR-74 and Redlands Avenue. The RTP includes a project (3M0731) that would split this freeway mainline section by adding a new interchange at Ellis Avenue. For this reason, this freeway section is listed as “I-215 SR-74 to Redlands” on the tables in the TIA and EIR describing conditions prior to construction of the Ellis Avenue interchange.”

Southbound I-215 from Baseline Road to Highland Avenue (F-83). This freeway segment was identified as a significant and unavoidable project direct impact (Existing Plus Project). Upon further review, it was determined that the significant and unavoidable impact will occur in the Year 2035

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Cumulative Plus Project scenario. For this reason, the impact has been moved to the Year 2035 Cumulative Plus Project analysis. Regarding F-83, the WLC would have a direct impact which was identified in the analysis of the Existing Plus Project scenario. However, the identified mitigation for this is already under construction. As a result, the direct impact will never exist. In the Cumulative scenario, F-83 would be deficient with or without WLC, even with the new lane currently under construction. Since the WLC is adding to a deficient condition it would have a cumulative impact on this segment. The solution to this would be to add yet another lane, but this is not feasible given the constraints at the site.

This section of the EIR assesses traffic impacts by examining the proposed project's impacts on Existing Baseline 2012, Opening Year 2022, and Year 2035 Cumulative traffic analysis time horizons. The impact of the entire proposed project has been assessed in the Baseline 2012 and Buildout Year 2035 time horizons, while the Baseline 2012 and Future Year 2022 analyses assess impacts of Phase 1 of the proposed project.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements, which affect several separate, adjacent and related properties. The following information is summarized from Section 3.0, *Project Description*. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes the WLC Specific Plan Area (2,610 acres), the CDFW Conservation Buffer Area (910 acres), the Public Facilities Lands area (194 acres), plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

Note: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The analysis contained in this section is based on the following technical studies prepared for the proposed project:

- *Traffic Impact Analysis Report for the World Logistics Center*, Parsons Brinckerhoff, September 2014 (Appendix L-1 of this EIR).
- *Trip Generation Analysis for High-Cube Warehouse Distribution Center Land Use for the NAIOP Inland Empire*, Kunzman Associates, Inc., December 20, 2011 (Appendix L-2 of this EIR).
- *Assessment of Available High-Cube Trip Generation Rates*, Memorandum from Aric Evatt, Urban Crossroads, Inc., to Ahmad Ansari, City of Moreno Valley, February 1, 2012 (Appendix L-3 of this EIR).
- Letter from George Rhyner, Crain & Associates, to Mr. Robert Evans, NAIOP Inland Empire, regarding Response to the South Coast Air Quality Management District White Paper, dated December 1, 2011 (Appendix L-4 of this EIR).

In addition to these technical studies, the analysis contained in this section is also based on the following reference document:

- Moreno Valley General Plan Circulation Element, adopted July 2006.

The TIA for the proposed project has been prepared in accordance with accepted standards and practices of the traffic engineering industry as summarized in a scoping agreement with the City of Moreno Valley. The TIA analyzes roadway segments, intersections, freeway mainline segments, freeway weaving areas, and freeway ramp merge/diverge locations and complies with the TIA Guidelines of the City and Caltrans. Figures 4.15.1, 4.15.2, 4.15.3, and 4.15.4 illustrate the locations of analysis roadway segments, intersections, freeway mainline segments, freeway weaving segments, and freeway ramp merge/diverge locations.

The study area for roadway segments included the roadways that will be affected by the proposed General Plan Amendment. The study area for intersections in Moreno Valley covered all intersections between streets classified as collector or higher and another collector or higher classification street, at which the proposed project would add 50 or more peak hour trips. This study area criterion was also applied to the main routes between the project and the neighboring cities of Riverside, Perris, Beaumont, San Jacinto, and Redlands. The study area also extended west to the nearest ramps to State Route (SR-91) and as far south as the I-215 ramps at Redlands Avenue in Perris.

The study area for freeways included the freeway routes extending from the project site to the north, south, east, and west. The analysis covered SR-60 from I-10 in the east to SR-71 in the west, SR-91/I-215 from I-210 in the east to I-15 in the west, I-215 from Redlands Avenue (4th Street) in the north to the Scott Road interchange in the south, and I-10 from SR-62 in the east to SR-60 in the west. In addition, the two main routes to the Ports of Los Angeles and Long Beach were assessed.

Any freeway ramp where the project added 100 or more peak-hour trips was also studied. These included:

- All ramps at the SR-60/Theodore Street Interchange;
- All ramps at the SR-60/Gilman Springs Road Interchange;

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- All ramps at the SR-60/Redlands Boulevard Interchange;
- The westbound off- and eastbound on-ramps to the SR-60/Central Avenue Interchange; and
- The westbound off- and eastbound on-ramps to the SR-60/Martin Luther King Boulevard Interchange.

Note: The following figures (3 of which were in the original DEIR) were modified or added in this revised DEIR section - the reader is referred to the original DEIR for the original graphic.

Figure 4.15.1: Study Roadway Segment Locations (replaced)

Figure 4.15.2: Study Intersection Locations (replaced)

Figure 4.15.3: Freeway Segment Locations (remains the same)

Figure 4.15.4: Freeway Segment Locations to the Ports of Los Angeles & Long Beach (new graphic)

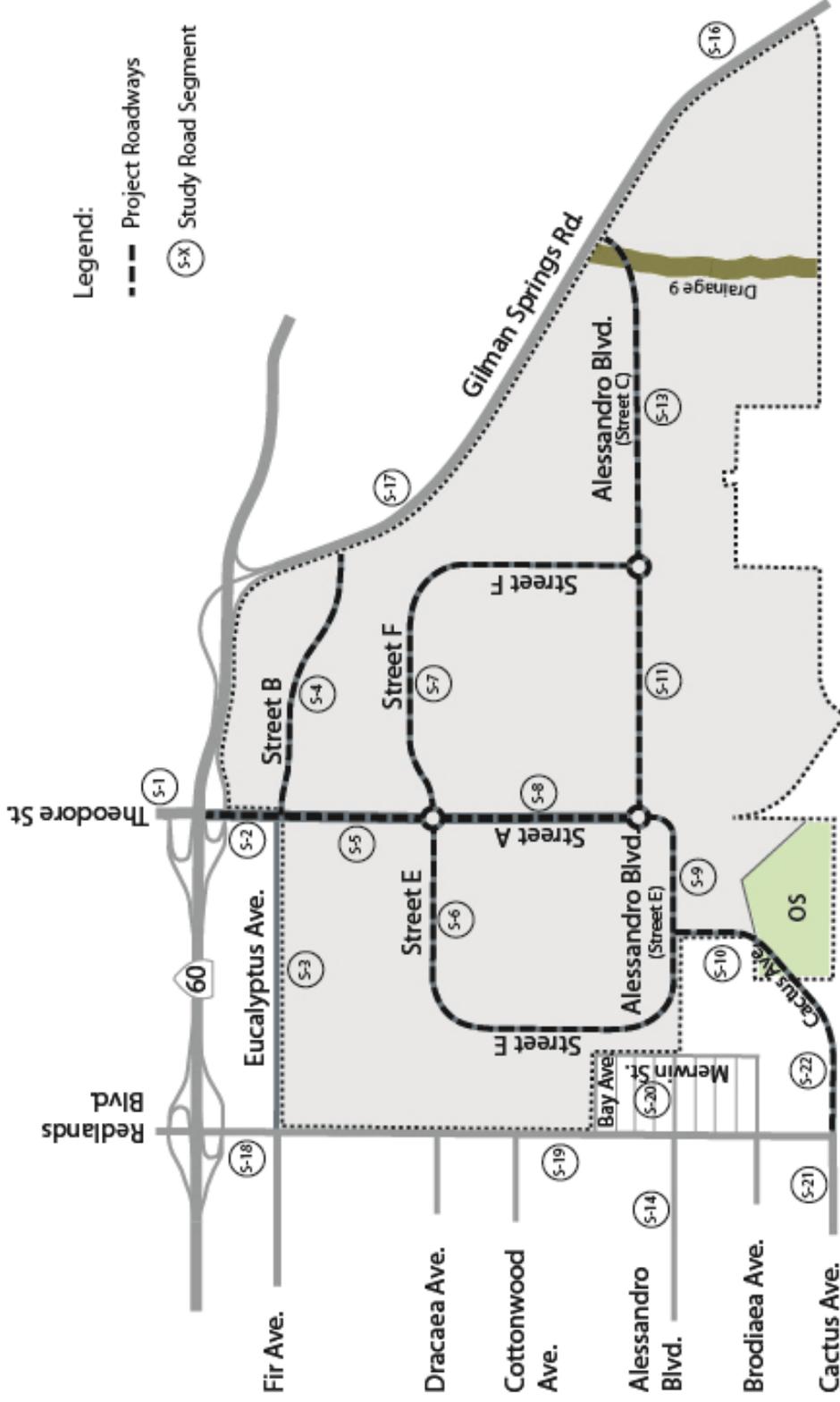


Figure 4.15.1: Study Roadway Segment Locations
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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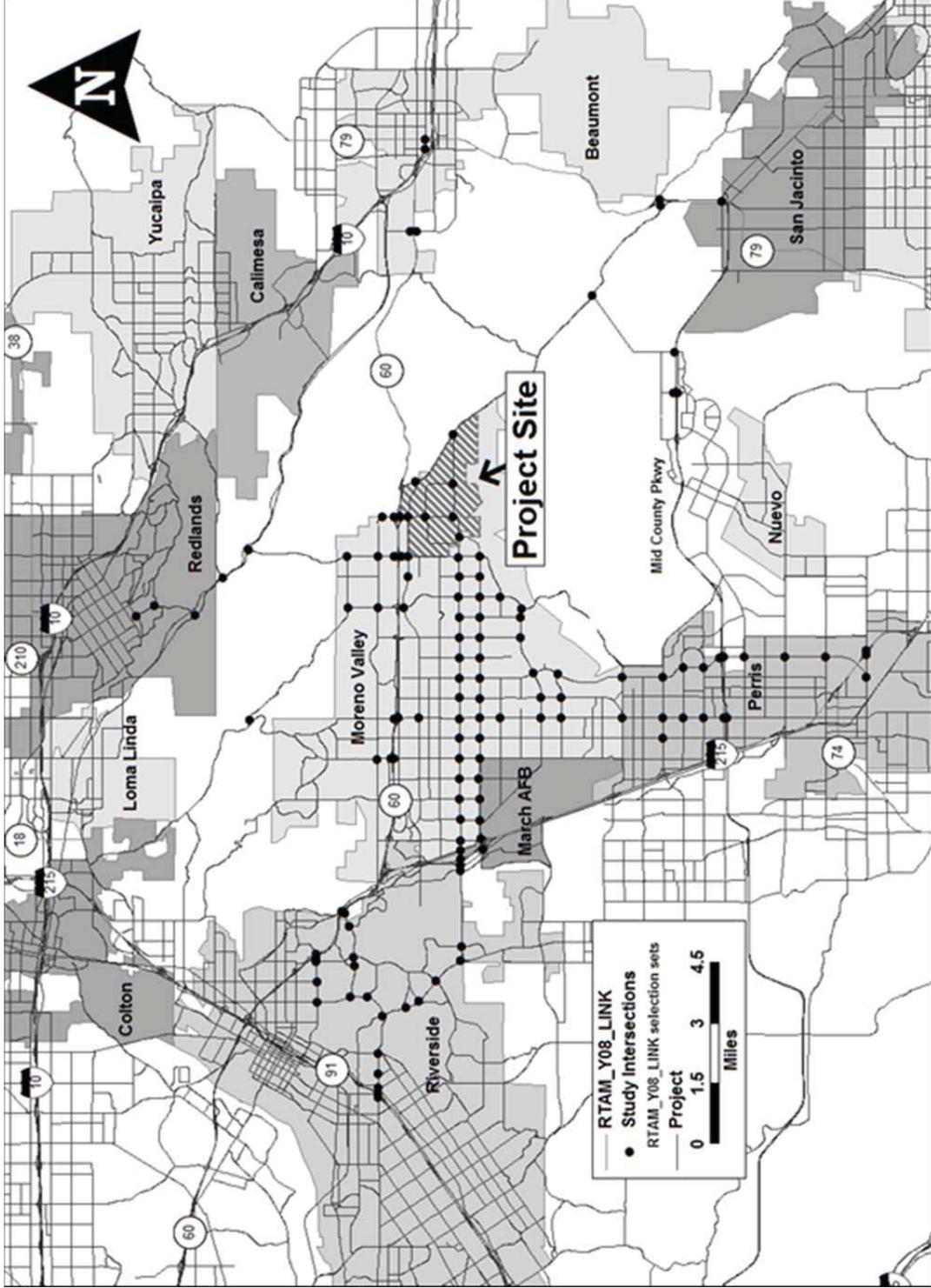


Figure 4.15.2: Study Intersection Locations
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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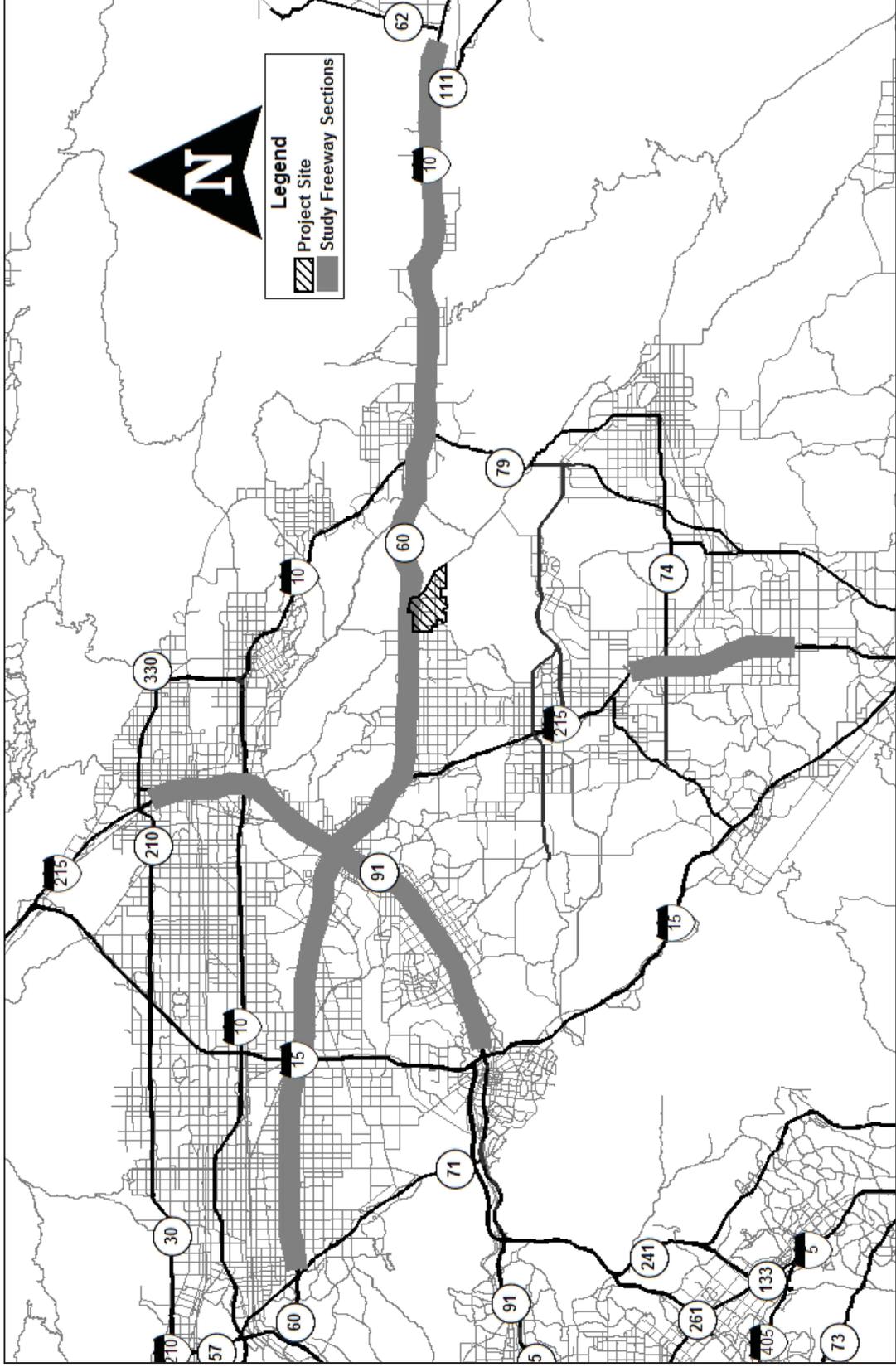


Figure 4.15.3: Freeway Segment Locations
Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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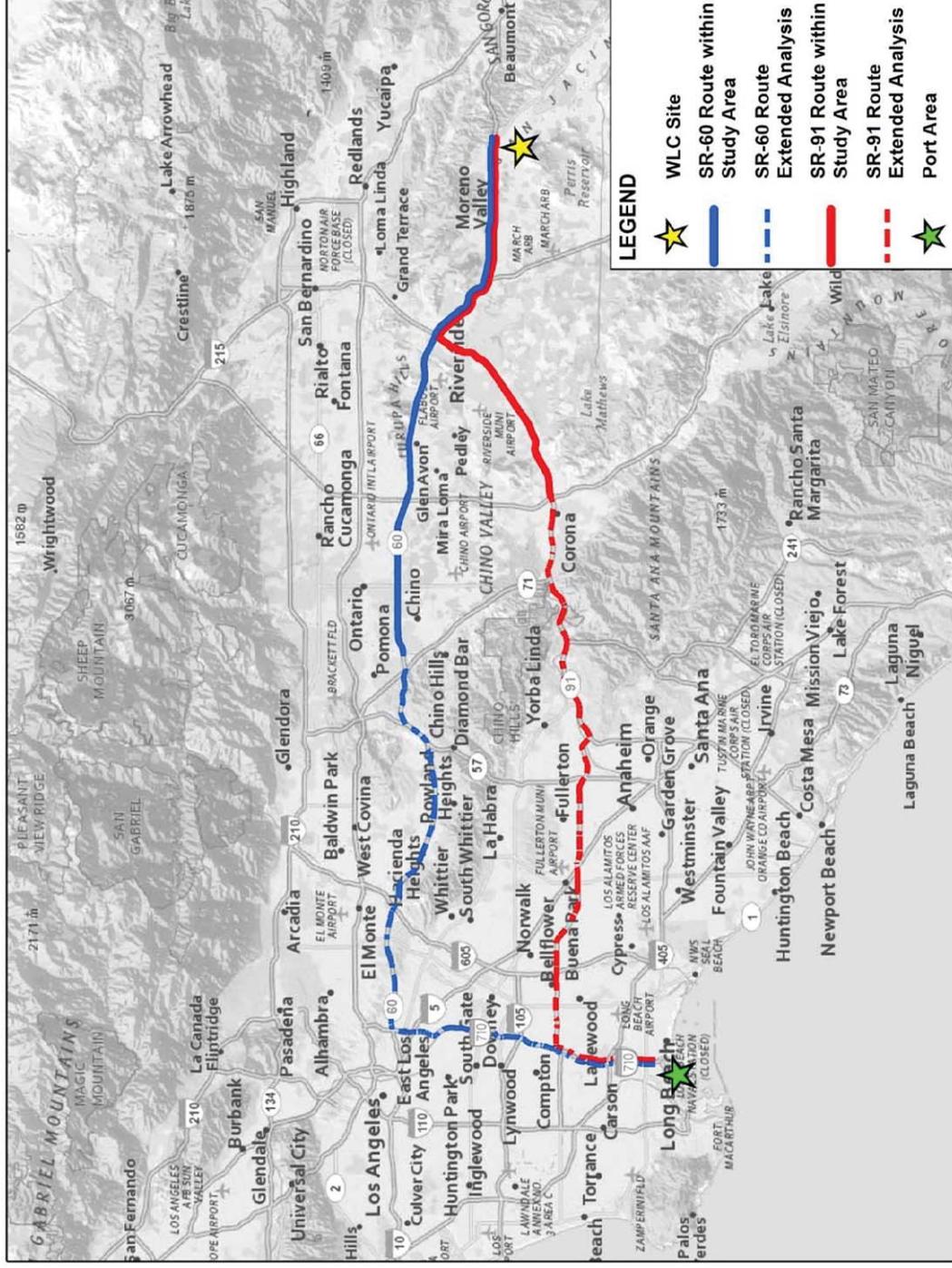


Figure 4.15.4: Freeway Segment Locations to the Ports of Los Angeles and Long Beach
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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4.15.1 Existing Setting

4.15.1.1 Traffic Level of Service Definitions

Level of Service (LOS) is an expression of a transportation facility's operations and is dictated by the relationship between capacity and traffic volumes. LOS is generally defined using the letter grades A through F (Table 4.15.A). These levels reflect the reality that conditions rapidly deteriorate as traffic approaches the absolute capacity of a thoroughfare.

Table 4.15.A: Traffic Level of Service Definitions

Level of Service	Description
A	No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.
F	This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, both speed and volume can drop to zero.

Source: *Highway Capacity Manual, Special Report 209*, Transportation Research Board, Washington, D.C., 2000.

Roadway Segment Level of Service Methodology. Roadway segment operations have been evaluated using the City of Moreno Valley Daily Roadway Capacity Values provided in the City of Moreno Valley General Plan Circulation Element as shown in Table 4.15.B.

Table 4.15.B: City of Moreno Valley Level of Service Criteria for Roadway Segments

Roadway Classification	Level of Service*				
	A	B	C	D	E
6-Lane Divided Arterial	33,900	39,400	45,000	50,600	56,300
4-Lane Divided Arterial	22,500	26,300	30,000	33,800	37,500
4-Lane Undivided Arterial	15,000	17,500	20,000	22,500	25,000
2-Lane Industrial Collector	7,500	8,800	10,000	11,300	12,500
2-Lane Undivided Residential	N/A	N/A	N/A	N/A	2,000

*Maximum Average Daily Traffic (ADT)

Source: City of Moreno Valley *Traffic Impact Analysis Preparation Guide*, 2007.

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Riverside County's LOS thresholds for surface streets were used for the assessment of impacts to Gilman Springs Road, as shown in Table 4.15.C.

Table 4.15.C: Riverside County LOS Thresholds for Surface Streets

Type of Roadway	Level of Service ⁽¹⁾		
	LOS C	LOS D	LOS E
8-Lane Urban Arterial	57,400	64,600	71,800
6-Lane Urban Arterial	43,100	48,500	53,900
4-Lane Urban Arterial	28,700	32,300	35,900
2-Lane Collector	10400	11700	13,000

Notes: All capacity figures are based on optimum conditions and are intended as guidelines for planning purpose only.

(1) Maximum two-way ADT values are based on the 1999 Modified Highway Capacity Manual Level of Service Tables as defined in the Riverside County Congestion Management Program.

Source: County of Riverside General Plan, Circulation Element, 2008

Intersection Level of Service Methodologies. LOS criteria for signalized intersections are identified in Table 4.15.D. Levels of service at signalized intersections were calculated using the methodology described in Chapter 16 of the *Highway Capacity Manual (HCM)* and generated by the Synchro analysis software. Signalized intersection LOS are based on an intersection's average control delay. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. For signalized intersections, LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation as described in Table 4.15.D.

Table 4.15.D: Level of Service Criteria for Unsignalized and Signalized Intersections

Level of Service	Unsignalized Intersection and Roundabouts Average Delay per Vehicle (sec.)	Signalized Intersection Average Delay per Vehicle (sec.)
A	≤ 10	≤ 10
B	> 10 and ≤ 15	> 10 and ≤ 20
C	> 15 and ≤ 25	> 20 and ≤ 35
D	> 25 and ≤ 35	> 35 and ≤ 55
E	> 35 and ≤ 50	> 55 and ≤ 80
F	> 50	> 80

Source: *Highway Capacity Manual*, Transportation Research Board, Washington, DC, 2000.

LOS criteria for unsignalized intersections are also identified in Table 4.15.D. The City of Moreno Valley requires unsignalized intersection analysis based on the methodology described in Chapter 17 of the HCM.

Freeway Level of Service Methodology. Caltrans LOS criteria for freeway mainline segments, freeway weave segments, and freeway ramp merge/diverge locations are expressed in terms of density (passenger cars/mile/lane). Table 4.15.E shows the correlation between density and LOS for freeway segments and ramps.

Table 4.15.E: Level of Service Criteria for Freeway Segments

Level of Service	Freeway Segment Density (passenger cars/mile/lane)	Freeway Weaving Segment Density (pc/mi/lane)	Freeway Ramp Density (passenger cars/mile/lane)
A	0–11.0	≤ 10.0	≤ 10.0
B	11.0–18.0	> 10.0 and ≤ 20.0	> 10.0 and ≤ 20.0
C	18.0–26.0	> 20.0 and ≤ 28.0	> 20.0 and ≤ 28.0
D	26.0–35.0	> 28.0 and ≤ 35.0	> 28.0 and ≤ 35.0
E	35.0–45.0	>35.0 and ≤ 43.0	>35
F	> 45.0	>43.0	Exceeds Capacity

Source: (Table 11, PB 2013) *Highway Capacity Manual*, Transportation Research Board, Washington, DC, 2000.

4.15.1.2 Baseline Conditions

The project is located within the eastern portion of the City of Moreno Valley. The project site is located south of SR-60 and west of Gilman Springs Road. Tables 4.15.F and 4.15.G show existing intersection control types and roadway through lanes for the study area intersections and roadways, respectively. LOS and volumes are discussed below for existing (2012) without project conditions (otherwise known as the “baseline” condition).

Baseline Levels of Service. Existing (2012) traffic operations have been evaluated for study area intersections. The analysis was performed for the a.m. and p.m. peak hours. Existing traffic volumes at study area intersections are based on peak hour intersection turn movement counts. An intersection level of service analysis was conducted to determine current intersection performance for existing baseline conditions. The levels of service for existing baseline conditions at study area intersections are summarized in Table 4.15.F, which shows the following 12 study intersections currently operate at an unsatisfactory level of service during either the a.m. and p.m. peak hour:

- Redlands Boulevard/Locust Avenue (a.m. and p.m.);
- Redlands Boulevard/SR-60 Westbound ramps (a.m. and p.m.);
- Oliver Street/Alessandro Boulevard (a.m.);
- Moreno Beach Drive/SR-60 Eastbound Ramps (p.m.);
- Lasselle Street/Cactus Avenue (a.m. and p.m.);
- Alessandro Boulevard/Chicago Avenue. (p.m.);
- Gilman Springs Road/Bridge Street (a.m.);
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road (a.m. and p.m.);
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road (a.m. and p.m.);
- San Timoteo Canyon Road/Alessandro Road (a.m. and p.m.);
- San Timoteo Canyon Road/Live Oak Canyon Road (a.m. and p.m.); and
- Redlands Boulevard/San Timoteo Canyon Road (a.m. and p.m.).

A roadway segment analysis was conducted to determine current roadway system performance for existing baseline conditions for the roadway segments that would be affected by the proposed General Plan Amendment. Roadway segment operations have been evaluated using the City of

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Moreno Valley Daily Roadway Capacity Values provided in the City of Moreno Valley General Plan Circulation Element and summarized in previously referenced Table 4.15.B. The roadway segment levels of service are summarized in Table 4.15.G. The following two roadway segments currently exceed the threshold of significance established in the General Plan.

Gilman Springs Road:

- Between Alessandro Boulevard and Bridge Street; and
- Between SR-60 and Alessandro Boulevard.

A freeway analysis was conducted for existing baseline conditions to determine current freeway performance on SR-60, SR-91, I-215, and I-10 basic freeway segments where the project would add 100 or more peak-hour trips and on the freeway routes to the Ports of Los Angeles and Long Beach. A freeway weaving analysis was conducted on freeway segments where an on-ramp is closely followed by an off-ramp, and the two are joined by an auxiliary lane. Existing baseline freeway mainline and weaving section levels of service are summarized in Tables 4.15.H and 4.15.I, respectively, which show the following 17 freeway mainline segments and six weaving segments are currently operating at an unsatisfactory level of service during either the a.m. or p.m. peak hour:

- SR-60, South Reservoir Street to Ramona Avenue (Westbound a.m.);
- SR-60, Ramona Avenue to Central Avenue (Westbound a.m., Eastbound p.m.);
- SR-60, Central Avenue to Mountain Avenue (Eastbound p.m.);
- SR-60, Euclid Avenue to Grove Avenue (Eastbound p.m.);
- SR-60, Grove Avenue to Vineyard Avenue (Eastbound p.m.);
- SR-60, Vineyard Avenue to Archibald Avenue (Eastbound p.m.);
- SR-60, Market Street to Main Street (Eastbound p.m.);
- SR-60, Martin Luther King Boulevard to Central Avenue (Eastbound p.m.);
- SR-60, I-215 to Day Street (Westbound a.m.);
- SR-91, I-15 to McKinley Street (Eastbound p.m.);
- SR-91, Pierce Street to Magnolia Avenue (Westbound p.m.);
- SR-91, Magnolia Avenue to La Sierra Avenue (Westbound p.m.);
- I-215, SR-74/Case Road to Redlands Boulevard (Westbound a.m., Eastbound p.m.);
- I-215, Barton Road to Mt. Vernon Avenue/Washington Street (Northbound a.m.);
- I-215, Baseline Road to Highland Avenue/SR-210 (Southbound a.m., Southbound p.m.);
- SR-60, SR-71/Garey Avenue to Reservoir Street (Eastbound p.m.);
- SR-60, SR-91 to Blaine Street/3rd Street (Eastbound p.m.);
- SR-60, Blaine Street/3rd Street to University Avenue (Eastbound p.m.);
- SR-60, Central Avenue to Fair Isle Drive/Box Springs Road (Westbound a.m.);
- SR-91, Arlington Avenue to Central Avenue (Eastbound a.m.); and
- SR-91, 14th Street to University Avenue (Westbound p.m.).

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Table 4.15.F: Existing (2012) Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
1	Theodore St/Street F	N/A	N/A	Non-Existent		Non-Existent	
2	Cactus Ave Extension/Street E	N/A	N/A	Non-Existent		Non-Existent	
3	Theodore St/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	9.7	A	10.1	B
4	Street C/Street F	N/A	N/A	Non-Existent		Non-Existent	
6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	CSS	10.3	B	15.7	C
9	Gilman Springs Rd/Eucalyptus Ave	N/A	N/A	Non-Existent		Non-Existent	
10	Redlands Blvd/Locust Ave	C	CSS	26.7	D	42.8	E
11	Redlands Blvd/Ironwood Ave	D	SIGNAL	40.9	D	37.3	D
12	Theodore Street/Ironwood Avenue	D	CSS	9.7	A	9.8	A
13	Redlands Blvd/SR-60 WB ramps	D	CSS	42.2	E	54.0	F
14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	9.6	A	14.4	B
15	Theodore Str/SR-60 WB ramps	D	CSS	9.0	A	9.6	A
16	Theodore Str/SR-60 EB ramps	D	CSS	9.2	A	9.4	A
17	Quincy Str/Fir Ave	N/A	N/A	Non-Existent		Non-Existent	
18	Redlands Blvd/Eucalyptus Ave (Fir)	N/A	N/A	Non-Existent		Non-Existent	
19	Theodore St/Fir Ave (Eucalyptus)	D	CSS	9.2	A	9.8	A
20	Oliver Str/Alessandro Blvd	C	CSS	25.9	D	14.7	B
21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	24.0	C	28.2	C
22	Quincy Str/Alessandro Blvd	N/A	N/A	Non-Existent		Non-Existent	
23	Redlands Blvd/Alessandro Blvd	C	AWS	20.5	C	13.8	B
24	Oliver Str/Cactus Ave	D	SIGNAL	23.8	C	17.3	B
25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	16.0	B	17.0	B
26	Quincy Str/Cactus Ave	N/A	N/A	Non-Existent		Non-Existent	
27	Redlands Blvd/Cactus Ave	C	AWS	11.4	B	8.2	A
28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	16.2	B	13.8	B
29	Heacock Str/Ironwood Ave	D	SIGNAL	29.6	C	31.9	C
30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	22.6	C	21.5	C
31	Heacock Str/SR-60 EB Ramps	D	SIGNAL	12.5	B	15.9	B
32	Sunnymead Blvd/Perris Blvd	D	SIGNAL	29.4	C	36.0	D
33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	22.0	C	19.7	B
34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	22.8	C	23.4	C
35	Moreno Beach Dr/Locust Ave	C	CSS	8.6	A	8.6	A
36	Moreno Beach Drive/Ironwood Avenue	D	SIGNAL	50.3	D	40.0	D
37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	38.0	D	76.6	E
38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	37.0	D	31.2	C
39	Iris Ave/Perris Blvd	D	SIGNAL	41.5	D	36.5	D
40	Kitching Str/Iris Ave	C	SIGNAL	23.4	C	17.5	B
41	Lasselle Str/Iris Ave	D	SIGNAL	25.4	C	26.6	C
42	Nason Str/Iris Ave	N/A	N/A	Non-Existent		Non-Existent	

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Table 4.15.F: Existing (2012) Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
43	Oliver Str/Iris Ave	D	SIGNAL	22.1	C	15.8	B
44	Via Dell Lago/Iris Ave	C	SIGNAL	6.7	A	6.5	A
45	Krameria Ave/Perris Blvd	D	SIGNAL	34.6	C	29.3	C
46	Kitching Str/Krameria Ave	D	SIGNAL	21.7	C	19.4	B
47	Lasselle Str/Krameria Ave	D	SIGNAL	37.9	D	13.5	B
48	Kitching Str/Alessandro Blvd	D	SIGNAL	28.8	C	24.7	C
49	Lasselle Str/Alessandro Blvd	D	SIGNAL	31.7	C	26.6	C
50	Morrison Str/Alessandro Blvd	D	SIGNAL	8.8	A	7.8	A
51	Nason Str/Alessandro Blvd	D	SIGNAL	20.5	C	16.9	B
52	Kitching Str/Cactus Ave	C	SIGNAL	33.3	C	22.6	C
53	Lasselle Str/Cactus Ave	C	SIGNAL	47.2	D	38.6	D
54	Morrison Str/Cactus Ave	N/A	N/A	Non-Existent		Non-Existent	
55	Nason Str/Cactus Ave	D	SIGNAL	22.5	C	21.0	C
56	Frederick Str/Alessandro Blvd	D	SIGNAL	19.5	B	25.6	C
57	Graham Str/Alessandro Blvd	D	SIGNAL	19.8	B	24.2	C
58	Heacock Str/Alessandro Blvd	D	SIGNAL	25.8	C	23.6	C
59	Indian Str/Alessandro Blvd	D	SIGNAL	17.6	B	27.9	C
60	Perris Blvd/Alessandro Blvd	D	SIGNAL	32.4	C	42.3	D
61	Frederick Str/Cactus Ave	D	SIGNAL	9.8	A	11.7	B
62	Graham Str/Cactus Ave	D	SIGNAL	12.9	B	17.4	B
63	Heacock Str/Cactus Ave	D	SIGNAL	30.1	C	20.3	C
64	Indian Str/Cactus Ave	C	SIGNAL	24.4	C	19.6	B
65	Perris Blvd/Cactus Ave	D	SIGNAL	26.9	C	30.7	C
66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	25.8	C	18.0	B
67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	6.4	A	12.6	B
68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	19.4	B	24.1	C
69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	18.2	B	18.6	B
70	Day Str/Alessandro Blvd	D	SIGNAL	4.6	A	8.2	A
71	Elsworth Str/Alessandro Blvd	D	SIGNAL	19.2	B	27.6	C
72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	12.1	B	19.7	B
73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	11.1	B	3.7	A
74	Elsworth Str/Cactus Ave	D	SIGNAL	26.7	C	29.5	C
75	Central Ave/Lochmoor Dr	D	SIGNAL	10.9	B	6.7	A
76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	22.2	C	17.6	B
77	SR-60 EB Ramps/Central Ave	D	SIGNAL	7.3	A	10.3	B
78	SR-60 WB Ramps/Central Ave	D	SIGNAL	6.8	A	8.2	A
79	Alessandro Blvd/Trautwein Rd	D	SIGNAL	28.4	C	14.8	B
80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	18.8	B	34.9	C
81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	43.2	D	36.5	D
82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	9.0	A	13.0	B
83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	43.2	D	28.0	C

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Table 4.15.F: Existing (2012) Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	8.6	A	4.7	A
85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	24.3	C	12.2	B
86	Central Ave/Chicago Ave	D	SIGNAL	23.4	C	23.1	C
87	Central Ave/El Cerrito Dr	D	SIGNAL	11.7	B	12.0	B
88	Central Ave/Canyon Crest Dr	D	SIGNAL	27.8	C	35.2	D
89	Chicago Ave/Country Club Dr	D	SIGNAL	6.3	A	4.9	A
90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	31.3	C	30.7	C
91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	21.0	C	20.8	C
92	Arlington Ave/Maude Str	D	SIGNAL	13.8	B	11.1	B
93	Horace St/Arlington Ave	D	SIGNAL	12.3	B	7.2	A
94	Arlington Ave/Victoria Ave	D	SIGNAL	54.8	D	30.9	C
95	Alessandro Blvd/Chicago Ave	D	SIGNAL	40.7	D	65.9	E
96	Alessandro Blvd/Century Ave	D	SIGNAL	16.7	B	7.6	A
97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	30.7	C	18.9	B
98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	20.4	C	17.9	B
99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	15.4	B	15.1	B
100	Harley Knox Blvd/Evan Rd	N/A	N/A	Non-Existent		Non-Existent	
101	Ramona Expy/Indian Str	E	SIGNAL	3.3	A	8.5	A
102	Ramona Expy/Perris Blvd	E	SIGNAL	31.7	C	34.6	C
103	Ramona Expy/Evans Rd	E	SIGNAL	54.5	D	28.8	C
104	Perris Blvd/Morgan Str	D	SIGNAL	11.8	B	6.7	A
105	Evans Rd/Morgan Str	C	SIGNAL	32.5	C	20.6	C
106	Perris Blvd/Rider Str	C	SIGNAL	24.5	C	23.0	C
107	Evans Rd/Rider Str	C	SIGNAL	34.2	C	28.3	C
108	Perris Blvd/Mid County Pkwy WB Ramps	N/A	N/A	Non-Existent		Non-Existent	
109	Perris Blvd/Mid County Pkwy EB Ramps	N/A	N/A	Non-Existent		Non-Existent	
110	Evans Rd/Mid County Pkwy WB Ramps	N/A	N/A	Non-Existent		Non-Existent	
111	Evans Rd/Mid County Pkwy EB Ramps	N/A	N/A	Non-Existent		Non-Existent	
112	Placentia Ave/Perris Blvd	D	SIGNAL	30.1	C	14.0	B
113	Evans Rd/Placentia Ave	N/A	N/A	Non-Existent		Non-Existent	
114	Evans Rd/Orange Ave	C	AWS	12.5	B	10.1	B
115	Evans Rd/Nuevo Rd	C	SIGNAL	23.3	C	22.6	C
116	Evans Rd/Ellis Ave	N/A	N/A	Non-Existent		Non-Existent	
117	Ellis Ave/I-215 SB Ramps	N/A	N/A	Non-Existent		Non-Existent	
118	Ellis Ave/SR-215 NB Ramps	N/A	N/A	Non-Existent		Non-Existent	
119	Evans Rd/San Jacinto Ave	N/A	N/A	Non-Existent		Non-Existent	

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Table 4.15.F: Existing (2012) Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
120	Park Center Blvd/Ramona Expy WB Ramps	N/A	N/A	Non-Existent		Non-Existent	
121	Park Center Blvd/Ramona Expy EB Ramps	N/A	N/A	Non-Existent		Non-Existent	
122	Bridge Str/Ramona Expy	C	CSS	22.4	C	20.6	C
123	Gilman Springs Rd/Bridge Str	C	CSS	26.6	D	20.8	C
124	SR-79 (Sanderson Ave) NB/Gilman Springs Rd	C	CSS	34.7	D	30.7	D
125	SR-79 (Sanderson Ave) SB/Gilman Springs Rd	C	CSS	29.2	D	48.2	E
126	Ramona Expy/Sanderson Ave	D	SIGNAL	27.1	C	20.8	C
127	Potrero Blvd/SR-60 WB Ramps	N/A	N/A	Non-Existent		Non-Existent	
128	Potrero Blvd/SR-60 EB Ramps	N/A	N/A	Non-Existent		Non-Existent	
129	W 6th Str/California Ave	C	AWS	16.6	C	18.0	C
130	W 6th Str/Beaumont Ave	C	SIGNAL	13.2	B	12.8	B
131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	18.9	B	6.3	A
132	San Timoteo Canyon Rd/Alessandro Blvd	D	AWS	77.2	F	23.9	C
133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	50.9	F	60.2	F
134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	81.8	F	80.5	F
135	W Crescent Ave/Alessandro Blvd	C	CSS	14.0	B	11.5	B
136	W Sunset Dr/Alessandro Blvd	C	AWS	8.9	A	9.0	A

denotes LOS exceeding the target threshold

"CSS" means cross-street is stop-controlled

"AWS" means all-way stop

"RABT" means roundabout

"NB" and "SB" denote northbound and southbound, respectively

"EB" and "WB" denote eastbound and westbound, respectively

"LT" and "RT" denote left turn and right turn, respectively

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15.G: Existing (2012) Roadway Segment Levels of Service

Roadway	From	To	Roadway Section*	LOS Standard	Daily Volume	LOS
S-1	Theodore Street (A)	Ironwood Avenue	2U	D	771	A
S-2	Theodore Street (A)	Fir (Eucalyptus) Ave	2U	D	2,046	A
S-3	Fir (Eucalyptus) Ave	Theodore Street (A)	2U**	D	1,339	A
S-4	Eucalyptus Ave (B)	Gilman Springs Rd		Future Road		
S-5	Theodore Street (A)	Street E	2U	D	641	A
S-6	Street E	Cactus Ave Extension		Future Road		
S-7	Street F	Alessandro Blvd (Street C)		Future Road		
S-8	Theodore Street (A)	Alessandro Blvd (Street C)	2U	D	641	A
S-9	Alessandro Blvd (Street E)	Theodore Street (A)	2U	D	2,537	A
S-10	Cactus Ave Extension	Cactus Ave		Future Road		
S-11	Alessandro Blvd (Street C)	Street F	2U	D	1,896	A
S-13	Alessandro Blvd (Street C)	Gilman Springs Rd	2U	D	1,896	A
S-14	Alessandro Blvd	Redlands Blvd	2U	D	3,877	A
S-16	Gilman Springs Rd	Bridge Street	2U	D	14,407	F
S-17	Gilman Springs Rd	Alessandro Blvd (Street C)	2U	D	11,973	E
S-18	Redlands Blvd	Fir (Eucalyptus) Ave.	2U	D	7,338	A
S-19	Redlands Blvd	Alessandro Blvd	2U	C	6,786	A
S-20	Alessandro Blvd	Merwin Street	2U	C	2,537	A
S-21	Redlands Blvd	Cactus Ave.	2U	C	6,786	A
S-22	Cactus Ave.	Cactus Ave. Extension	2U**	C	472	A

* Section is the number of lanes, with "U" for "undivided" and "D" for "Divided" roadways

** Road currently has 2 lanes in one direction and 1 lane in the other. The capacity shown is based on the narrower direction.

*** LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways

Indicates LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.H: Existing (2012) Freeway Segment Levels of Service

ID	Freeway	Segment	Northbound / Eastbound			Southbound / Westbound								
			AM Peak Hour		PM Peak Hour	AM Peak Hour		PM Peak Hour						
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS			
F-2	SR-60	Reservoir St to Ramona Ave	6,024	24.5	C	7,822	33.0	D	8,762	41.4	E	6,381	25.6	C
F-3	SR-60	Ramona Ave to Central Ave	5,687	22.8	C	9,400	47.3	F	8,283	37.1	E	5,925	23.4	C
F-4	SR-60	Central Ave to Mountain Ave	6,339	26.2	D	9,338	46.6	F	6,336	24.7	C	6,076	24.1	C
F-5	SR-60	Mountain Ave to Euclid Ave	6,205	25.4	C	6,664	26.1	D	6,259	24.4	C	6,495	26.3	D
F-6	SR-60	Euclid Ave to Grove Ave	7,650	34.7	D	9,091	43.8	E	6,461	25.4	C	6,302	25.2	C
F-7	SR-60	Grove Ave to Vineyard Ave	6,923	29.6	D	9,400	47.3	F	6,274	24.3	C	6,699	27.4	D
F-8	SR-60	Vineyard Ave to Archibald Ave	6,823	28.7	D	9,400	47.3	F	7,658	32.1	D	6,245	25.0	C
F-9	SR-60	Archibald Ave to Haven Ave	6,268	25.6	C	6,471	25.1	C	See Weaving Analysis			See Weaving Analysis		
F-10	SR-60	Haven Ave to Milliken Ave	6,096	19.1	C	6,864	20.6	C	5,804	17.4	B	5,698	17.5	B
F-11	SR-60	Milliken Ave to I-15	4,234	16.5	B	4,529	16.9	B	5,456	20.5	C	5,111	19.5	C
F-12	SR-60	I-15 to Etiwanda Ave/Van Buren Blvd	2,593	10.2	A	2,910	10.8	A	4,490	13.4	B	4,275	13.0	B
F-13	SR-60	Etiwanda Ave/Van Buren Blvd/Country Village Rd	3,026	11.9	B	3,968	14.8	B	4,220	15.7	B	3,881	14.8	B
F-14	SR-60	Mission Blvd/Country Village Rd to Pedley Rd	2,596	10.2	A	3,061	11.4	B	4,172	15.5	B	3,963	15.1	B
F-15	SR-60	Pedley Rd to Pyrite St	2,813	11.1	B	3,334	12.4	B	3,216	12.0	B	3,068	11.7	B

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ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-16	SR-60	Pyrite St to Valley Way	3,348	13.2	B	3,642	13.6	B	2,653	9.9	A	2,567	9.8	A
F-17	SR-60	Valley Way to Rubidoux Blvd	4,398	23.7	C	4,252	21.4	C	4,532	23.1	C	4,725	24.9	C
F-18	SR-60	Rubidoux Blvd to Market St	4,943	27.6	D	4,706	24.3	C	3,568	17.7	B	3,868	19.7	C
F-19	SR-60	Market St to Main St	4,498	24.4	C	7,050	47.8	F	5,631	30.9	D	5,109	27.6	D
F-20	SR-60	Main to SR-91	See Weaving Analysis	See Weaving Analysis		See Weaving Analysis	See Weaving Analysis		5,248	27.9	D	4,720	24.9	C
F-24	SR-60	Martin Luther King Blvd to Central Ave	5,865	24.6	C	8,976	45.7	F	7,050	30.6	D	5,800	24.1	C
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	4,332	16.9	B	6,795	26.6	D	7,461	31.1	D	6,376	25.6	C
F-27	SR-60	I-215 to Day St	See Weaving Analysis	See Weaving Analysis		See Weaving Analysis	See Weaving Analysis		7,050	47.9	F	3,093	15.9	B
F-29	SR-60	Pigeon Pass Rd to Heacock St	2,702	21.6	C	3,713	30.2	D	3,013	23.1	C	3,254	26.5	D
F-30	SR-60	Heacock St to Perris Blvd	2,349	18.6	C	3,355	26.1	D	2,638	19.9	C	2,671	20.8	C
F-31	SR-60	Perris Blvd to Nason St	1,812	14.3	B	2,344	17.4	B	1,910	14.3	B	2,045	15.8	B
F-32	SR-60	Nason St to Moreno Beach Dr	1,619	12.8	B	2,038	15.1	B	See Weaving Analysis	See Weaving Analysis		See Weaving Analysis	See Weaving Analysis	
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	1,326	10.5	A	1,397	10.4	A	988	7.4	A	1,336	10.3	A
F-34	SR-60	Redlands Blvd to Theodore St	1,614	12.7	B	1,920	14.2	B	1,193	8.9	A	1,498	11.6	B
F-35	SR-60	Theodore St to Gilman Springs Rd	1,521	12.0	B	1,915	14.2	B	1,183	8.9	A	1,393	10.8	A

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Table 4.15.H: Existing (2012) Freeway Segment Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	1,213	11.2	B	1,484	12.3	B	837	7.0	A	1,002	9.1	A
F-37	SR-60	Jack Rabbit Trail to I-10	1,215	9.6	A	1,482	11.0	A	837	6.3	A	1,002	7.7	A
F-39	SR-91	I-15 to McKinley St	5,914	22.6	C	9,400	53.3	F	6,402	25.1	C	5,971	24.1	C
F-40	SR-91	McKinley St to Pierce St	5,382	29.1	D	5,427	31.4	D	4,788	25.0	C	5,183	29.3	D
F-41	SR-91	Pierce St to Magnolia Ave	4,888	25.5	C	4,922	27.2	D	4,629	23.9	C	7,050	53.3	F
F-42	SR-91	Magnolia Ave to La Sierra Ave	See Weaving Analysis						4,894	25.7	C	7,050	53.3	F
F-43	SR-91	La Sierra Ave to Tyler St	4,585	23.5	C	4,939	27.3	D	4,467	22.9	C	5,167	29.2	D
F-44	SR-91	Tyler St to Van Buren Blvd	5,704	21.7	C	5,851	23.5	C	5,769	22.1	C	6,661	27.8	D
F-45	SR-91	Van Buren Blvd to Adam St	5,841	22.3	C	4,999	19.6	C	5,342	20.2	C	6,401	26.3	D
F-46	SR-91	Adam St to Madison St	6,531	26.1	D	4,742	18.7	C	4,939	18.6	C	5,453	21.5	C
F-47	SR-91	Madison St to Arlington Ave	5,879	22.8	C	4,530	17.9	B	4,218	21.4	C	4,711	25.5	C
F-49	SR-91	Central Ave to 14th St	6,021	34.8	D	5,391	30.8	D	4,737	24.7	C	4,940	27.2	D
F-51	SR-91	University Ave to Spruce St	7,244	22.1	C	6,394	20.0	C	See Weaving Analysis					
F-52	I-10	SR-60 to Beaumont Ave	3,037	11.9	B	4,252	16.4	B	4,288	18.1	C	3,675	13.8	B
F-53	I-10	Beaumont Ave to Pennsylvania Ave	3,087	12.1	B	4,322	16.7	B	4,358	18.4	C	3,736	14.0	B

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ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	3,236	12.6	B	4,531	17.5	B	4,569	19.4	C	3,916	14.7	B
F-55	I-10	Highland Springs Ave to Sunset Ave	3,112	12.2	B	4,357	16.8	B	4,393	18.6	C	3,766	14.1	B
F-56	I-10	Sunset Ave to 22 nd St	3,037	11.9	B	4,252	16.4	B	4,288	18.1	C	3,675	13.8	B
F-57	I-10	22 nd St to 8th St	2,987	11.7	B	4,182	16.2	B	4,218	17.8	B	3,615	13.5	B
F-58	I-10	8th St to Hargrave St	2,987	11.7	B	4,182	16.2	B	4,218	17.8	B	3,615	13.5	B
F-59	I-10	Hargrave St to Field Rd	2,689	10.5	A	3,764	14.5	B	3,796	16.0	B	3,254	12.2	B
F-60	I-10	Field Rd to Morongo Trail	2,564	10.0	A	3,590	13.9	B	3,620	15.3	B	3,103	11.6	B
F-61	I-10	Morongo Trail to Main St	2,265	8.8	A	3,172	12.3	B	3,198	13.5	B	2,741	10.3	A
F-62	I-10	Main St to Haugen-Lehmann Way	2,265	8.8	A	3,172	12.3	B	3,198	13.5	B	2,741	10.3	A
F-64	I-10	SR-111 to Tipton Rd	1,967	7.7	A	2,753	10.6	A	2,777	11.7	B	2,380	8.9	A
F-65	I-10	Tipton Rd to SR-62	1,967	7.7	A	2,753	10.6	A	2,777	11.7	B	2,380	8.9	A
F-66	I-215	Scott Rd to Newport Rd	2,739	22.0	C	3,285	25.8	C	2,294	17.2	B	2,318	17.2	B
F-68	I-215	Newport Rd to McCall Blvd	1,900	15.0	B	2,047	15.3	B	2,528	19.0	C	3,111	23.7	C
F-69	I-215	McCall Blvd to Ethanac Rd	2,457	19.5	C	3,293	25.8	C	3,069	23.6	C	2,539	18.9	C
F-70	I-215	Ethanac Rd to SR-74	3,787	34.5	D	3,150	24.4	C	2,882	21.9	C	3,854	32.0	D

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Table 4.15.H: Existing (2012) Freeway Segment Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-71	I-215	SR-74 to Redlands Blvd	3,350	28.5	D	4,181	37.4	E	4,539	44.2	E	3,710	30.1	D
F-74	I-215	Columbia Ave to Center St	5,587	33.5	D	5,150	27.3	D	5,191	27.6	D	4,917	25.4	C
F-75	I-215	Center St to La Cadena Dr	5,474	32.4	D	5,034	26.5	D	5,541	30.4	D	5,235	27.6	D
F-76	I-215	La Cadena Dr to Barton Rd	5,341	31.2	D	5,164	27.5	D	5,414	29.4	D	5,196	27.3	D
F-77	I-215	Barton Rd to Mt. Vernon Ave	5,738	35.1	E	5,533	30.3	D	5,435	29.5	D	5,256	27.7	D
F-78	I-215	Mt. Vernon Ave to I-10	5,582	22.5	C	5,420	20.5	C	5,776	22.0	C	5,606	21.0	C
F-80	I-215	Auto Plaza Dr to Mill St	4,319	17.1	B	4,533	17.0	B	4,022	15.1	B	4,090	15.2	B
F-83	I-215	Baseline Rd to Highland Ave	3,023	24.8	C	3,355	26.5	D	4,537	44.1	E	4,700	46.7	F

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.I: Existing (2012) Freeway Weaving Segment Levels of Service

ID	Freeway	Weaving Segment	Northbound / Eastbound			Southbound / Westbound								
			AM Peak Hour		PM Peak Hour	AM Peak Hour		PM Peak Hour						
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS			
W-1	SR-60	SR-71/Garey Ave to Reservoir St	5,985	24.0	C	8,616	35.7	E	6,125	21.4	C	5,892	20.8	C
W-9	SR-60	Haven Ave to Archibald Ave	See Basic Analysis			See Basic Analysis			6,288	23.5	C	6,071	23.5	C
W-20	SR-60	Main St to SR-91	5,418	25.8	C	7,050	33.6	D	See Basic Analysis			See Basic Analysis		
W-21	SR-60	SR-91 to Blaine St/3rd St	3,885	14.8	B	9,400	39.0	E	7,729	28.6	D	7,211	27.2	C
W-22	SR-60	Blaine St/3rd St to University Ave	3,919	18.7	B	7,050	37.4	E	5,714	20.1	C	6,204	23.0	C
W-23	SR-60	University Ave to Martin Luther King Blvd	4,528	20.4	C	5,932	25.7	C	5,601	28.0	C	5,876	28.0	C
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs Rd	3,856	14.5	B	7,840	32.4	D	7,050	37.0	E	6,026	29.3	D
W-27	SR-60	I-215 to Day St	2,988	10.6	B	4,704	18.8	B	See Basic Analysis			See Basic Analysis		
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	2,995	12.8	B	4,749	20.7	C	4,700	31.0	D	4,197	27.2	C
W-32	SR-60	Moreno Beach Dr to Nason St	See Basic Analysis			See Basic Analysis			1,609	9.2	A	See Basic Analysis		
W-42	SR-91	Magnolia Ave to La Sierra Ave	5,445	24.6	C	5,684	27.4	C	See Basic Analysis			See Basic Analysis		
W-48	SR-91	Arlington Ave to Central Ave	7,050	35.3	E	4,073	19.6	B	4,642	21.1	C	5,118	23.8	C
W-50	SR-91	14th St to University Ave	4,643	21.8	C	4,441	21.9	C	5,179	24.1	C	7,050	35.5	E
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	See Basic Analysis			See Basic Analysis			5,075	14.4	B	8,804	26.9	C
W-73	I-215	SR-60 to Columbia Ave	6,260	34.4	D	5,548	28.0	C	5,877	26.4	C	5,495	24.5	C
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,400	16.3	B	4,147	14.5	B	4,890	16.8	B	4,591	16.3	B
W-81	I-215	Mill St to 2nd St	5,044	23.0	C	5,095	22.5	C	4,442	19.6	B	4,380	19.4	B
W-82	I-215	5th St to Baseline Rd	3,754	16.5	B	3,590	14.9	B	3,607	15.6	B	3,481	15.1	B
W-63	I-10	Haugen-Lehmann Way to SR-111	2,265	7.5	A	3,172	10.5	B	3,198	11.8	B	2,741	10.3	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Freeway ramp merge and diverge operations were also evaluated for existing baseline conditions. The results of this analysis are presented in Table 4.15.J, which shows all ramp merge and diverge areas analyzed are currently operating at satisfactory LOS D or better with the exception of:

- SR-60 Eastbound On-Ramp from Central Avenue (p.m. peak hour).

4.15.1.3 Responses to NOP Comments

During the NOP comment period, the City received comments on the project. The comments pertaining to traffic and circulation and responses to those comments are provided below:

Caltrans Comment Letter Dated February 29, 2012 (DEIR Appendix B)

A Traffic Impact Study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities and to propose appropriate mitigation measures. The study should be based on Caltrans' *Guide for the Preparation of Traffic Impact Studies (TIS)*, which is located at http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.

Response

- 1) A traffic impact assessment (TIA) has been performed for the project. The study has been prepared to cover the subjects required under Caltrans TIS guidelines.

It should be noted that the project proposes to move the Alessandro Boulevard access from Gilman Springs Road, which could potentially improve the operation of Alessandro Boulevard/Gilman Springs Road.

- 3) Any existing inadequacies of freeways and roads cannot be attributed to this proposed project, but are considered in the TIA. While it is true that a portion of the City near I-215 has been designated for industrial development, it is also true that much of the project site was designated for business park development in the current General Plan. Initial studies suggest that the traffic attributable to the proposed project will be substantially less than the traffic generated by the site under the uses proposed in the General Plan. The adequacy of the Theodore Street interchange to accommodate future traffic has been studied as part of the TIA.
- 4) Any existing inadequacies of freeways and roads cannot be attributed to this proposed project. The proposed project does not include any land north of SR-60, so the need for schools, fire stations, hospitals, and other public facilities north of SR-60 would need to be addressed through some mechanism other than this project. The need for the on-site road system to accommodate through traffic has been studied as part of the TIA.
- 5) One goal of the WLCSP Circulation Plan is to separate project-related trucks from passenger vehicle traffic on surrounding local streets. Much of the project traffic will access SR-60 via a new interchange at Theodore Street, and project truck traffic will be prohibited on Redlands Boulevard south of Eucalyptus Avenue and on Street D to Cactus Avenue southwest of the project.
- 6) The adequacy of the new proposed Theodore Street interchange to accommodate future (cumulative) traffic has been studied as part of the TIA.
- 7) The TIA takes into consideration known projects in neighboring jurisdictions to examine cumulative traffic impacts.
- 8) The TIA studied the number of lanes needed for the study roadways that are significantly affected by the project. The number of mid-block lanes and intersection approach geometry needed will depend on a combination of traffic volumes and anticipated turning movements, which will differ by location.

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Table 4.15.J: Existing (2012) Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp Segment	Ramp No. of Lanes	AM Peak Hour				PM Peak Hour			
				Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS
R-1	SR-60 EB	On-Ramp from Martin Luther King Blvd	1	4,110	242	16.9	B	5,678	906	26.5	C
R-2	SR-60 EB	On-Ramp from Central Ave	1	5,796	349	18.5	B	8,868	904	31.8	F
R-3	SR-60 EB	Off-Ramp to Redlands Blvd	1	1,326	207	3.3	A	1,397	434	3.2	A
R-4	SR-60 EB	Loop On-Ramp from Redlands Blvd	1	1,119	26	12.2	B	963	25	10.3	B
R-5	SR-60 EB	Direct On-Ramp from Redlands Blvd	0	Does not Exist in this Scenario				Does not Exist in this Scenario			
R-6	SR-60 EB	Off-Ramp to Theodore St	1	1,614	119	17.3	B	1,920	30	19.1	B
R-7	SR-60 EB	Loop On-Ramp from Theodore St	1	1,495	70	17.3	B	1,890	71	19.8	B
R-8	SR-60 EB	Direct On-Ramp from Theodore St	0	Does not Exist in this Scenario				Does not Exist in this Scenario			
R-9	SR-60 EB	Off-Ramp to Gilman Springs Rd	1	1,521	330	16.4	B	1,915	385	19.0	B
R-10	SR-60 EB	On-Ramp from Gilman Springs Rd	1	1,191	7	14.2	B	1,530	8	16.3	B

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Table 4.15.J: Existing (2012) Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp Segment	Ramp No. of Lanes	AM Peak Hour				PM Peak Hour			
				Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS
R-11	SR-60 WB	Off-Ramp to Gilman Springs Rd	1	837	11	9.6	A	1,002	9	11.3	B
R-12	SR-60 WB	On-Ramp from Gilman Springs Rd	1	826	357	13.5	B	993	306	14.6	B
R-13	SR-60 WB	Off-Ramp to Theodore St	1	1,183	24	12.7	B	1,393	26	14.9	B
R-14	SR-60 WB	On-Ramp from Theodore St	1	1,159	34	12.1	B	1,367	131	14.8	B
R-15	SR-60 WB	Off-Ramp to Redlands Blvd	1	1,193	49	12.8	B	1,498	38	15.9	B
R-16	SR-60 WB	Loop On-Ramp from Redlands Blvd	1	1,144	329	14.3	B	1,460	361	17.4	B
R-17	SR-60 WB	Direct On-Ramp from Redlands Blvd	0	Does not Exist in this Scenario				Does not Exist in this Scenario			
R-18	SR-60 WB	Off-Ramp to Central Ave	2	7,050	384	32.6	D	6,026	439	28.5	D
R-19	SR-60 WB	Off-Ramp to Martin Luther King Blvd	1	7,050	474	21.0	C	5,800	337	15.9	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Bush Letter Dated March 13, 2012 (Scoping Meeting Cards 2, DEIR Appendix B)

- 1) The adequacy of Alessandro Boulevard and Gilman Springs Road to accommodate project-related traffic has been studied as part of the TIA.
- 2) Moreno Valley's current General Plan calls for a realignment of Alessandro Boulevard and the relocation of its intersection with Gilman Springs Road. This has been studied as part of the TIA.

4.15.2 Existing Policies and Regulations

The City of Moreno Valley’s current General Plan was approved in July 2006, and the following goals and policies are extracted from the Circulation Element of the current General Plan.

Community Development

Policy 2.2.17 Discourage nonresidential uses on local residential streets that generate traffic, noise, or other characteristics that would adversely affect nearby residents.

Circulation Element

Objective 5.1 **Create a safe, efficient, and neighborhood-friendly street system.**

Policy 5.1.1 Plan access and circulation of each development project to accommodate vehicles (including emergency vehicles and trash trucks), pedestrians, and bicycles.

Policy 5.1.2 Plan the circulation system to reduce conflicts between vehicular, pedestrian and bicycle traffic.

Policy 5.1.3 Require adequate off-street parking for all developments.

Policy 5.1.4 Driveway placement shall be designed for safety and to enhance circulation wherever possible.

Policy 5.1.5 Incorporate American Disability Act (ADA) and Title 24 requirements in roadway improvements as appropriate.

Policy 5.1.6 Design new developments to provide opportunity for access and circulation to future adjacent developments.

Objective 5.2 **Implement access management policies.**

Policy 5.2.1 Locate residential units with access from local streets. Minimize direct residential access from collectors. Prohibit direct single-family driveway access on arterials and higher classification roadways.

Policy 5.2.2 Feed short local street into collectors.

Policy 5.2.3 Encourage the incorporation of traffic calming design into local and collector streets to promote safe vehicle speeds.

Policy 5.2.4 Design new subdivisions to minimize the disruptive impact of motor vehicles on local streets. Long, broad and linear streets should be avoided. Residential streets should be no wider than 40 feet, and should have an uninterrupted length of less than one half mile. Curvilinear streets and cul-de-sacs are preferred. Streets within the subdivision should be designed to facilitate access to residences and to discourage through traffic.

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.**

Policy 5.3.1 Obtain right-of-way and construct roadways in accordance with the designation shown on the General Plan Circulation Element Map and the City street improvement standards.

Policy 5.3.2 Wherever feasible, promote the development of roadways in accordance with the City standard roadway cross-sections, as shown in Figure 9-3. Cross-sections range from two-lane undivided roadways to 8-lane divided facilities.

- Policy 5.3.3** Create new roadway classifications to accommodate future traffic demand, including; Divided Major Arterial – Reduced Cross-Section, and Divided Arterial – 6-lane. These cross-sections are shown on Figure 9-3.
- Policy 5.3.4** For planning purposes, utilize LOS standards shown on Table 5 –1 to determine recommended roadway widths.
- Policy 5.3.5** Ensure that new development pays a fair-share cost to provide local and regional transportation improvements and to mitigate cumulative traffic impacts. For this purpose, require new developments to participate in Transportation Uniform Mitigation Fee (TUMF), the Development Impact Fee Program (DIF), and any other applicable transportation fee programs and benefit assessment districts.
- Policy 5.3.6** Where new developments would increase traffic flows beyond the LOS C (or LOS D, where applicable), require appropriate and feasible mitigation measures as a condition of approval. Such measures may include extra right-of-way and improvements to accommodate left-turn and right-turn lanes at intersections, or other improvements.
- Policy 5.3.7** Provide consideration to projects that have overriding regional or local benefits that would be desirable even though the LOS standards cannot be met. These projects would be required to analyze traffic impacts and mitigate such impacts to the extent that it is deemed feasible.
- Policy 5.3.8** Pursue arterial improvements that link and/or cross the State Route 60 (SR-60) Freeway, including an additional over-crossing at Graham Street.
- Policy 5.3.9** Address additional widenings at arterials providing access to SR-60 at Day Street, Frederick Street/Pigeon Pass Road, and Perris Boulevard.
- Objective 5.4** **Maximize efficiency of the regional circulation system through close coordination with State and regional agencies and implementation of regional transportation policies.**
- Policy 5.4.1** Coordinate with Caltrans and the Riverside County Transportation Commission (RCTC) to identify and protect ultimate rights-of-way, including those for freeways, regional arterial projects, transit, bikeways, and interchange expansion.
- Policy 5.4.2** Coordinate with Caltrans and RCTC regarding the integration of Intelligent Transportation Systems (ITS) consistent with the principles and recommendations of the Inland Empire Regional ITS Architecture Project.
- Policy 5.4.3** Work with property owners, in cooperation with RCTC, to reserve rights-of-way for potential Community and Environmental Transportation Acceptability Process (CETAP) corridors through site design, dedication, and land acquisition, as appropriate.
- Policy 5.4.4** The City Council will commit to establishing ongoing relationships with all agencies that play a role in the development of the City's transportation system. Council members who are appointed to these agencies as City representatives shall seek out leadership roles to maximize their effectiveness on behalf of the City. Council will strive to maintain continuity in their appointments of representatives.
- Policy 5.4.5** Work with RCTC, WRCOG, and the TUMF Central Zone Committee to facilitate the expeditious construction of TUMF Network projects, especially projects that directly benefit Moreno Valley.

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- Policy 5.4.6** Cooperatively participate with SCAG, RCTC, and WRCOG in the planning for a transportation system that anticipates regional needs for the safe and efficient movement of goods and people.
- Policy 5.4.7** Utilizing a combination of regional, state and federal funds, development impact fees, and other locally generated funds, provide needed improvements along SR 60 and the associated interchanges, including interchange and grade separation improvements.
- Policy 5.4.8** Reserve rights-of-way to accomplish future improvements as specified in the Caltrans District 8 Route Concept Fact Sheet for SR-60. Specifically, SR-60 shall be built to six general purpose lanes and two High Occupancy Vehicle (HOV) lanes through Moreno Valley. Additional auxiliary lanes may be required between interchanges. The need for auxiliary lanes will be determined from future studies.
- Policy 5.4.9** Lobby the State Legislature to keep triple trailer trucks off highways in developed areas of California.
- Objective 5.5** **Maximize efficiency of the local circulation system by using appropriate policies and standards to design, locate, and size roadways.**
- Policy 5.5.1** Space Collectors between higher classification roadways within development areas at appropriate one-quarter mile intervals.
- Policy 5.5.2** Provide dedicated left-turn lanes at all major intersections on minor arterials and higher classification roadways.
- Policy 5.5.3** Prohibit points of access from conflicting with other existing or planned access points. Require points of access to roadways to be separated sufficiently to maintain capacity, efficiency, and safety of the traffic flow.
- Policy 5.5.4** Wherever possible, minimize the frequency of access points along streets by the consolidation of access points between adjacent properties on all circulation element streets, excluding collectors.
- Policy 5.5.5** Design streets and intersections in accordance with the Moreno Valley Municipal Code.
- Policy 5.5.6** Consider the overall safety, efficiency and capacity of street designs as more important than the location of on-street parking.
- 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.
- Policy 5.5.8** Whenever possible, require private and public land developments to provide on-site and off-site improvements necessary to mitigate any development-generated circulation impacts. A review of each proposed land development project shall be undertaken to identify project impacts to the circulation system. The City may require developers to provide traffic impact studies prepared by qualified professionals to identify the impacts of a development.
- Policy 5.5.9** Design curves and grades to permit safe movement of vehicular traffic per applicable Caltrans and Moreno Valley standards.
- Policy 5.5.10** Provide adequate sight distances for safe vehicular movement at all intersections and driveways.

- Policy 5.5.11** Implement National Pollutant Discharge Elimination System (NPDES) Best Management Practices (BMPs) relating to construction of roadways to control runoff contamination from affecting water resources.
- Objective 5.6** **Support development of a ground access system to March Inland Port in accordance with its development plan as a major cargo airport.**
- Policy 5.6.1** Ensure that City arterials that provide access to and from March Inland Port are properly designed to accommodate projected traffic volumes, including truck traffic.
- Policy 5.6.2** Ensure that traffic routes to March Inland Port are planned to minimize impacts to City residential communities.
- Objective 5.7** **Design roads to meet the needs of the residents of the community without detracting from the “rural” atmosphere in designated portions of Moreno Valley. (Designated “rural” areas include those encompassed by the Residential Agriculture 2, Residential 1, Rural Residential and Hillside Residential zoning districts. “Urban” areas encompass all other zoning districts.)**
- Policy 5.7.1** Pursue development of modified sidewalk standards for local and collector roads within low density areas to reflect the rural character of those areas.
- Policy 5.7.2** Provide sidewalks on arterials in designated low density areas that provide access to schools and bus stops.
- Objective 5.8** **Encourage development of an efficient public transportation system for the entire community.**
- Policy 5.8.1** Support the development of high-speed transit linkages, or express routes, that would benefit the citizens and employers of Moreno Valley.
- Policy 5.8.2** Support the efforts of the March Joint Powers Authority in its pursuit of a Transit Center.
- Policy 5.8.3** Encourage public transportation opportunities that address the particular needs of transit dependent individuals in the City such as senior citizens, the disabled and low-income residents.
- Policy 5.8.4** Ensure that all new developments make adequate provision for bus stops and turnout areas for both public transit and school bus service.
- Policy 5.8.5** Continue ongoing coordination with transit authorities toward the expansion of transit facilities into newly developed areas.
- Objective 5.9** **Support and encourage development of safe, efficient and aesthetic pedestrian facilities.**
- Policy 5.9.1** Encourage walking as an alternative to single occupancy vehicle travel, and help ensure the safety of the pedestrian as follows:
- (a) All new developments shall provide sidewalks in conformance with the City’s streets cross-section standards, and applicable policies for designated urban and rural areas.
 - (b) The City shall actively pursue funding for the infill of sidewalks in developed areas. The highest priority shall be to provide sidewalks on designated school routes.

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- Policy 5.9.2** Walkways shall be designed to minimize conflicts between vehicles and pedestrians.
- Policy 5.9.3** Where appropriate, provide amenities such as, but not limited to, enhanced paving, seating, and landscaping to enhance the pedestrian experience.
- Policy 5.9.4** Require the provision of convenient and safe pedestrian access to buildings from the public sidewalk.
- Objective 5.10** **Encourage bicycling as an alternative to single occupant vehicle travel for the purpose of reducing fuel consumption, traffic congestion, and air pollution.**
- Policy 5.10.1** Bikeways shall link residential neighborhood areas with parks, employment centers, civic and commercial areas, and schools.
- Policy 5.10.2** Integrate bikeways, consistent with the Bikeway Plan, with the circulation system and maintain Class II and III bikeways as part of the City’s street system.
- Policy 5.10.3** Support bicycle safety programs, and active enforcement of laws relating to the safe operation of bicycles on City streets.
- Policy 5.10.4** Link local bikeways with existing and planned regional bikeways.
- Objective 5.11** **Eliminate obstructions that impede safe movement of vehicles, bicyclists, and pedestrians.**
- Policy 5.11.1** Landscaping adjacent to City streets, sidewalks and bikeways shall be designed, installed and maintained so as not to physically or visually impede public use of these facilities.
- (a) The removal or relocation of mature trees, street trees and landscaping may be necessary to construct safe pedestrian, bicycle and street facilities.
- (b) New landscaping, especially street trees shall be planted in such a manner to avoid overhang into streets, obstruction of traffic control devices or sight distances, or creation of other safety hazards.
- Policy 5.11.2** Driveways shall be designed to avoid conflicts with pedestrian and bicycle travel.
- Objective 5.12** **Promote efficient circulation planning for all school sites that will maximize pedestrian safety, and minimize traffic congestion and neighborhood impacts.**
- Policy 5.12.1** Coordinate with school districts to identify suggested pedestrian routes within existing and new subdivisions for school children to walk to and from schools and/or bus stops.
- Program 5-1** Periodically review current traffic volumes, traffic collision data, and the pattern of urban development to coordinate, program, and as necessary revise the planning and prioritization of road improvements.
- Program 5-2** Periodically reassess the goals, objectives and policies statements of the Circulation Element and propose amendments, as necessary.
- Program 5-3** Develop a comprehensive strategy to ensure full funding of the circulation system. The strategy will include the DIF, TUMF, and other funding sources that may be available to the City. In addition, the creation of benefit assessment districts, and road and bridge fee districts may be considered where appropriate.

- Program 5-4** Develop a multi-year transportation infrastructure improvement program that, to the extent feasible, phases the construction of new projects in advance of new development.
- Program 5-5** The above-referenced program will prioritize circulation improvement projects to be funded from DIF, TUMF and other sources. Prioritization to consider the following factors: (a) Traffic safety; (b) Congestion relief; (c) Access to new development; and (d) Equitable benefit.
- Program 5-6** Conduct studies of specified arterial segments to determine if any additional improvements will be needed to maintain an acceptable LOS at General Plan buildout. Generally, these segments will be studied as new developments are proposed in their vicinity. Measures will be identified that are consistent with the Circulation Element designation of these roadway segments, such as additional turn lanes at intersections, signal optimization by coordination and enhanced phasing, and travel demand management measures. The study of specified arterial segments will be required to identify measures to maintain an acceptable LOS at General Plan buildout for at least one of the reasons discussed below:
- (a) Segments will need improvement, but their ultimate volumes slightly exceed design capabilities.
 - (b) Segments will need improvements but require inter-jurisdictional coordination.
 - (c) Segments would require significant encroachment on existing adjacent development if built out to their Circulation Element designations.
- Program 5-7** Establish traffic study guidelines to deal with development projects in a consistent manner. The traffic study guidelines shall include criteria for projects that propose changes to the approved General Plan land uses.
- Program 5-13** Implement Transportation demand management (TDM) strategies that reduce congestion in the peak travel hours. Examples include carpooling, telecommuting, and flexible work hours.

4.15.3 Methodology

This section summarizes: i) the traffic volume scenarios analyzed in this EIR and methods of traffic volume projection; ii) the proposed project's trip generation, distribution and assignment; and iii) opening year, 2022 background and Year 2035 Cumulative background levels of service.

4.15.3.1 Traffic Volume Scenarios

Existing Baseline, Existing Baseline Plus Phase 1, and Existing Baseline Plus Project Conditions. The existing year (2012) represents the baseline traffic conditions as they existed at the time the Notice of Preparation was issued to represent pre-project approval (existing physical conditions). The existing baseline plus project analysis determines direct project-related traffic impacts that would occur on the existing roadway system in a theoretical scenario in which the project is placed upon existing baseline conditions.

Within the project site, the proposed Phase 1 land uses were used for the "Plus Phase 1" scenarios, the proposed project buildout land uses were used for the "Plus Project" scenarios, while the existing land uses were used for the "No Project" scenarios. The Existing Plus Phase 1 and Existing plus Project analyses are intended to identify the project-specific impacts associated solely with the

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development of the proposed project and the corresponding mitigation measures necessary to mitigate the project-related impacts.

Year 2017 and Year 2017 Plus Project Conditions. This analysis was removed from the revised TIA and DEIR sections – the reader is referred to Section 4.15.3.1 of the original DEIR for that text, tables, etc.

Year 2022 and Year 2022 Plus Phase 1 Conditions. The year 2022 analysis determines the project’s cumulative contribution to near-term traffic impacts based on a comparison of year 2022 conditions to year 2022 plus Phase 1 of the project conditions. Within the site, the proposed Phase 1 land uses were used for the “Plus Phase 1” scenarios while the existing land uses were used for the “No Project” scenarios.

The opening year 2022 cumulative analysis has been utilized to determine if improvements funded through local and regional transportation mitigation fee programs, such as the Transportation Uniform Mitigation Fee (TUMF) program and the City of Moreno Valley Development Impact Fee (DIF) program, can accommodate the cumulative traffic at the target LOS identified in the City of Moreno Valley General Plan. If the regionally funded improvements can provide the target LOS, and the payment of such funds for such improvements is foreseeable, then the project’s payment into the established fee programs will be considered as mitigation for cumulative impacts through the conditions of approval. Other improvements needed beyond the regionally funded improvements (such as localized improvements to non-TUMF, or non-DIF) are identified in the impacts section (Section 4.15.5).

The circulation system assumed in the analysis includes transportation improvement projects that are either under construction or are funded and planned for implementation in the short-term. These improvement projects are identified in SCAG’s 2012-2035 Regional Transportation Plan (RTP). The RTP is a long-range transportation plan based on 20-year growth projections that is developed and updated by SCAG every four years. The Federal Transportation Improvement Program (FTIP) is a capital listing of all transportation improvement projects proposed over a six-year period for the SCAG region. The FTIP implements the transportation projects and programs listed in the RTP in compliance with state and federal requirements. For the 2022 scenarios, only the projects in the FTIP and the RTP’s financially constrained¹ project list were assumed to be completed. The projects in the RTP’s Strategic Plan were not included because funding for them is too uncertain. Also, the proposed East-West Freight Corridor included in the financially constrained plan was not included because the freight corridor is expected to be funded through tolls to be collected by a process that has not yet been established and whose future efficacy is unknown. If it is constructed, then traffic impacts would be less than those described in this EIR. The 2022 improvements are shown in Figure 4.15.5.

Note: Figure 4.15.5 was added to the revised DEIR section.

¹ These are the projects for which funds are committed or have reasonably available revenue sources, and are probable for implementation.

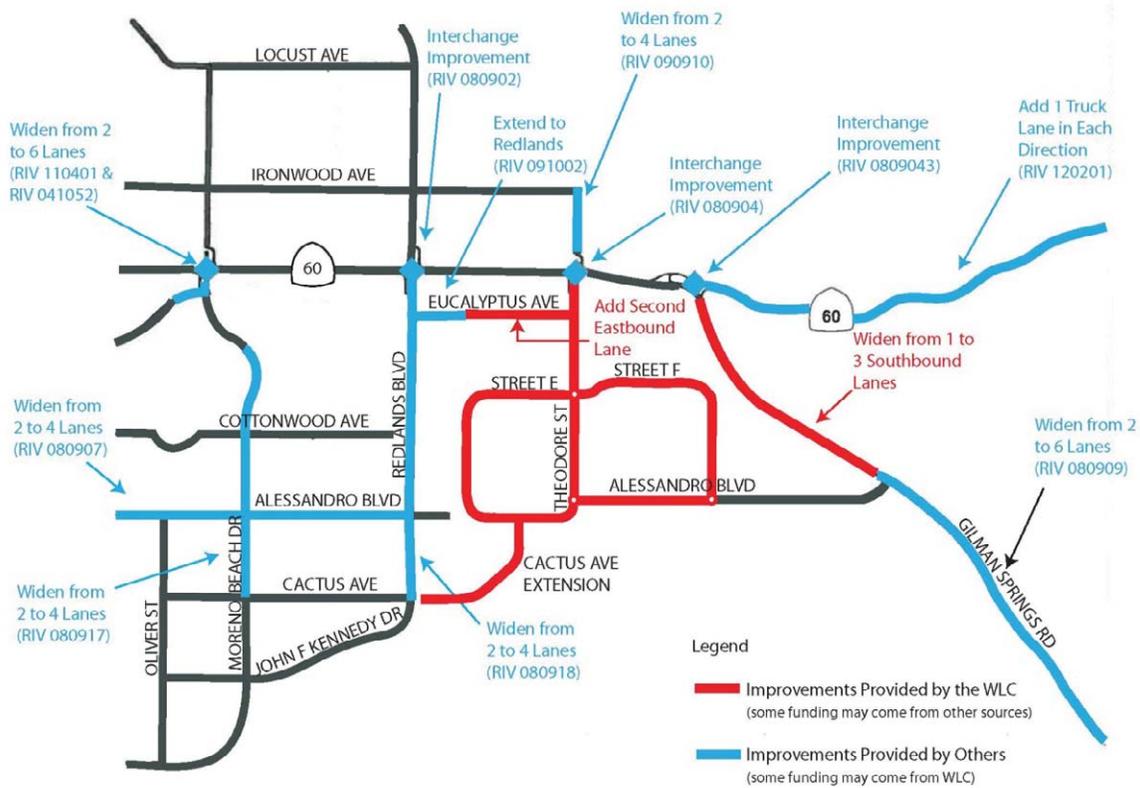


Figure 4.15.5: Roadway Improvements Assumed for 2022

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Phase 1 of the proposed project will be completed in 2022 and includes 21,450,000 square feet of logistics warehouse uses. This is approximately 52 percent of the total project building space. The internal road system will be partially built out, with east-west through traffic served by the Cactus Avenue extension and Streets C and E. Theodore Street would serve north-south traffic as it does today.

Traffic projections for year 2022 conditions were derived from the RivTAM using accepted procedures for model forecast refinement and smoothing. The traffic forecasts reflect the area-wide growth anticipated between existing (2012) baseline conditions and horizon year (2022) conditions. Specifically, traffic generated by other approved projects (cumulative projects) in the vicinity of the proposed project were included in the socioeconomic inputs for the year 2022 traffic volume scenario as shown on Figure 4 and Table 1 in the Traffic Impact Analysis Report, dated September 2014 (Appendix L-1). As noted previously, because some of the cumulative development projects may not be constructed at the anticipated time, or at all due to economic conditions, the cumulative impact analysis contained within the TIA is inherently conservative and would tend to overstate cumulative impacts. A detailed summary of the volume development methodology is included in the project Traffic Impact Analysis Report, dated September 2014 (Appendix L-1).

Project traffic volumes at study locations were added to opening year cumulative volumes to develop opening year cumulative plus project traffic volumes.

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Year 2035 Cumulative and Year 2035 Cumulative Plus Project Conditions. Year 2035 Cumulative conditions determine the project’s cumulative contribution to long-term traffic impacts under year 2035 with buildout of the land uses and circulation system in the General Plan. Within the project site, the proposed project buildout land uses were used for the “Plus Project” scenarios while the existing land uses were used for the “No Project” scenarios. This analysis has also been utilized to determine if improvements funded through local and regional transportation mitigation fee programs, such as the TUMF program and the City of Moreno Valley DIF program, can accommodate the cumulative traffic at the target LOS identified in the City of Moreno Valley General Plan. If the regionally funded improvements can provide the target LOS, and the payment of such funds for such improvements is foreseeable, then the project’s payment into the established fee programs will be considered as cumulative mitigation through the conditions of approval. Other improvements needed beyond the regionally funded improvements (such as localized improvements to non-TUMF, or non-DIF) are identified in the impacts section (Section 4.15.5).

For the 2035 scenarios, the roadway projects from the FTIP and RTP included in the year 2022 network were also included in the 2035 network. The future circulation network from the City of Moreno Valley General Plan was also incorporated into the year 2035 network. The General Plan identifies future circulation improvements that are funded through the City’s DIF, Western Riverside Council of Governments’ TUMF, and improvements made directly by developers. It is reasonable to assume that these improvements will be in place parallel with buildout of the General Plan land uses, because most of the improvements will be funded through fees on the new developments. If other sites do not fully build out per the General Plan, then the LOS on the study streets and intersection would likely be better than shown in the TIA. The 2035 improvements are shown in Figure 4.15.6.

Note: Figure 4.15.6 was added to the revised DEIR section.

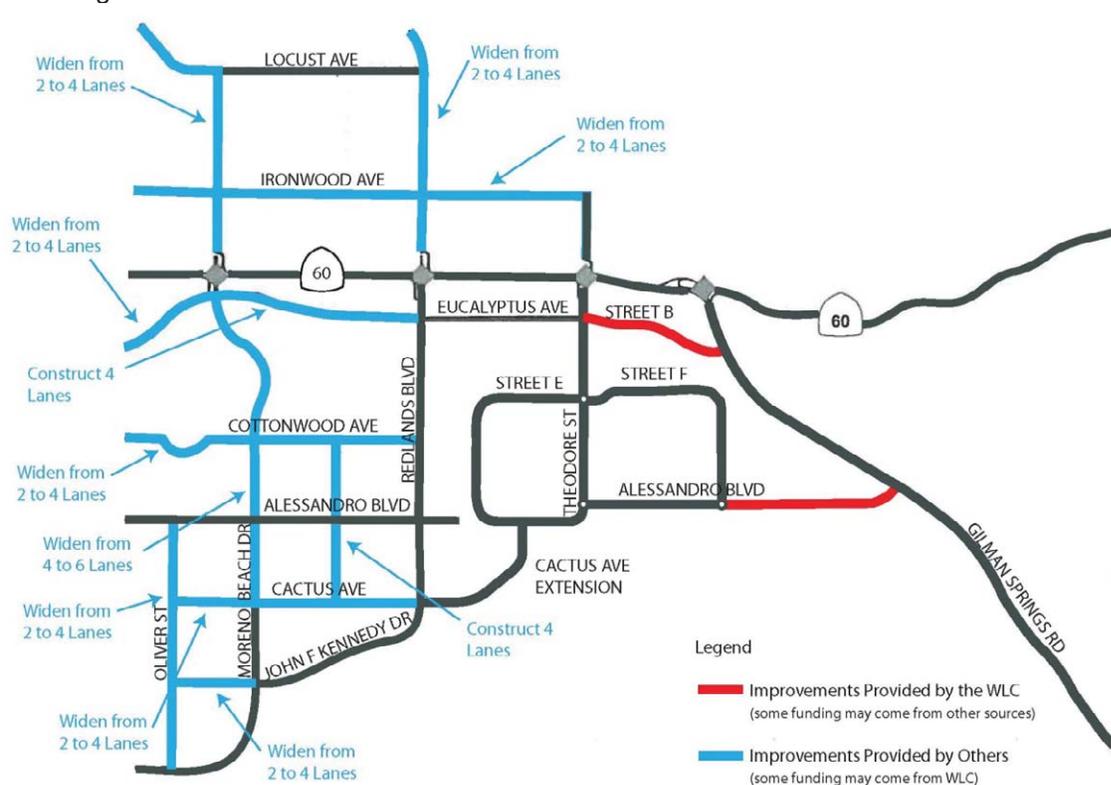


Figure 4.15.6: Roadway Improvements Assumed for 2035

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Traffic projections for Year 2035 Cumulative conditions were derived from the RivTAM using accepted procedures for model forecast refinement and smoothing. The traffic forecasts reflect the area-wide growth anticipated between existing (2012) baseline conditions and horizon year (2035) conditions. Specifically, traffic generated by other approved projects (cumulative projects) in the vicinity of the proposed project were included in the socioeconomic inputs to the RIVTAM for the Year 2035 Cumulative traffic volume scenario as shown in Figure 4 and Tables 1 and 2 in the Traffic Impact Analysis Report, dated September 2014 (Appendix L-1). As noted above, because some of the developments contained within the cumulative analysis may not be constructed at the anticipated time, or at all due to economic conditions, the cumulative impact analysis contained within the TIA is inherently conservative and would tend to overstate cumulative impacts. A detailed summary of the volume development methodology is included in the project Traffic Impact Analysis Report, dated September 2014 (Appendix L-1).

Project traffic volumes at study locations were to added Year 2035 Cumulative traffic volumes to develop Year 2035 Cumulative plus project traffic volumes.

Table 4.15.K summarizes the forecast years as well as each development scenario analyzed.

Table 4.15.K: Analysis Scenarios

Forecast Year	Scenarios Analyzed
2012	<ul style="list-style-type: none"> • Existing (2012) Baseline Conditions. • Existing (2012) Baseline Plus Phase 1 Conditions Project (21,450,000 square feet). • Existing Baseline plus Project Conditions.
2022	<ul style="list-style-type: none"> • Year 2022 without Project Conditions Analysis based on data from the RivTAM plus cumulative projects. • Year (2022) plus Phase 1 Project (21,450,000 square feet).
2035	<ul style="list-style-type: none"> • Year 2035 Cumulative, without Project: Analysis based on data from the RivTAM plus cumulative projects. • Year 2035 Cumulative plus Project.

4.15.3.2 Project Trip Generation, Distribution, and Assignment

Note: The following changes have been made in response to: Comments F-3-5, 11, and Appendix 176 in Letter F-3 from the California Clean Energy Committee; Comments F-6-1, 2, and 3 in Letter F-6 from the Endangered Habitats League; Comment F-9A-45 in Letter F-9A from the Sierra Club, Center for Community Action & Environmental Justice, and Natural Resources Defense Council; Comment F-9B-45 in Letter F-9B from Tom Brohard and Associates; Comment F-11-29 in Letter F-11 from the Sierra Club, San Gorgonio Chapter; Comment G-2-7 in Letter G-2 from Perry Johnson; Comment G-17-2 in Letter G-17 from Joanne Lindgren; Comment G-18-1 in Letter G-18 from Sam Zaidy; Comment G-34-5 in Letter G-34 from Lindsay Robinson; Comment G-35-4 in Letter G-35 from Peggy Hadaway and John Neal; Comment G-49-18 in Letter G-49 from Karen Jakpor; Comment G-50-2 in Letter G-50 from Ann McKibben; Comment G-51-5 in Letter G-51 from Michael McCoy; Comments G-52-1 and 2 in Letter G-52 from Steve Jiannino; Comment G-53-4 in Letter G-53 from Deanna Reader and Kenny Bell; Comment G-57-1 in Letter G-57 from Tracy Hodge; Comment G-68-3 in Letter G-68 from Craig and Joan Givens; Comment G-96-3 in Letter G-96 from Margie Breikreuz; and Comment G-97-1 in Letter G-97 from Otana Jakpor.

Trip generation represents the amount of traffic that is attracted and produced by a development project. The amount of traffic generated by a specific project is based on the specific land uses being proposed. Traffic engineers utilize different yet similar methodologies to anticipate trip generations.

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Many times, average trip generation rates as published by the Institute of Transportation Engineers (ITE) are used to forecast trip rates. In some circumstances, however, use of the ITE trip generation rates is not deemed to be the most accurate methodology of forecasting trip generation because more precise data are available. Therefore, in an effort to forecast the number of vehicle trips potentially generated by the proposed project accurately, the TIA examined and compared the results of four different trip generation sources: (1) the ITE *Trip Generation*, 9th Edition; (2) the Fontana Truck Trip Generation Study (2003); (3) the 2011 NAIOP trip generation study for high-cube logistics warehouses in Riverside and San Bernardino Counties; and (4) Skechers Trip Generation Study (2011). The City’s TIA guidelines specify use of a combination of the first two sources, with the ITE Trip Generation Manual being the source of the trip generation rate and the City of Fontana Truck Trip Generation Study being the source of the vehicle mix percentages. Table 4.15.L summarizes the trip rates from each source.

Table 4.15.L: Trip Generation Rate Comparison (Skechers Data Added)

Source of Trip Generation Rates	A.M. Peak Hour			P.M. Peak Hour			Daily
	In	Out	Total	In	Out	Total	
ITE <i>Trip Generation Manual</i>	0.0759	0.0341	0.1100	0.0372	0.0828	0.1200	1.68
Fontana <i>Truck Trip Generation Study</i>	0.0357	0.0343	0.0700	0.0224	0.0506	0.0730	1.97
NAIOP 2011 <i>Trip Generation Study</i>	0.030	0.017	0.047	0.022	0.048	0.070	0.99
Skechers Traffic Counts	0.022	0.013	0.035	0.004	0.033	0.037	0.567

Source: Tables 3, 4 and 5, Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

The trip generation rates derived from existing driveway traffic counts collected at the Skechers Warehouse Facility in November 2011 showed that for all time periods the traffic generated by the Skechers building was only about one-third of what the ITE trip generation rates would have predicted. Furthermore, the actual truck traffic was less than half (41%) of what the methodology mandated in the City of Moreno Valley’s traffic impact guidelines (ITE trip generation rates with the vehicle mix from the Fontana Truck Trip Generation Study) would predict.

Several comments received on the Draft EIR suggested that the trip generation for the proposed project use a combination of a very high overall trip generation rate with a high heavy truck percentage to estimate the number of project truck trips. The City has found that this approach produces unreasonable trip generation rates when compared to actual field conditions. For example, the EIR for the Skechers high-cube warehouse building used this unreasonable approach and found the forecasts to be three times the actual post-construction trip generation for car trips and nearly eight times the actual trip generation for trucks¹. This approach could result in the construction of oversized and unnecessary roadway infrastructure with its own environmental consequences, creating an undue burden on development, and could ultimately discredit the City’s project review process in the eyes of the business community and members of the public. For these reasons, this approach was not used to estimate trips for the proposed project and the City’s Traffic Impact Guidelines was appropriately used instead.

The 2011 NAIOP provides the more accurate trip generation for the proposed project as the NAIOP study is the most comprehensive trip study performed for high-cube logistics warehouses. As shown in previously referenced Table 4.15.L, when using the NAIOP and derived trip generation rates, project trips are forecast to be lower than if the ITE trip generation rates were used. However, in order to be conservative, this EIR and the TIA utilize the ITE 9th Edition trip rates, which have the

¹ These figures are based on traffic counts taken at the Skechers building after it had been fully operational for over a year. See Technical Memorandum *Traffic Generated by the Skechers Warehouse*, Parsons Brinckerhoff to the City of Moreno Valley, November 14, 2012.

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effect of overestimating project impacts because high-cube logistics warehousing would comprise 99.4 percent of the overall project building area. Therefore, as determined in the TIA, trip generation rates for high-cube warehouse uses (Land Use 152) as published in the 9th Edition of ITE's *Trip Generation* manual, and currently widely accepted throughout Riverside and San Bernardino Counties, are the trip rates being utilized to determine the project's traffic impacts. For this reason, the actual traffic impacts of the proposed project are expected to be much less than those identified in the TIA and by extension this EIR. The project trip generation rates for the proposed project and existing land uses on the site are shown in Table 4.15.M.

Table 4.15.M: Project Trip Generation Rates for Proposed and Existing Land Uses

Land Use Type	Unit	AM Peak Hour			PM Peak Hour			ADT
		In	Out	Total	In	Out	Total	
Proposed Land Uses								
High-Cube Logistics Center (ITE 152)	KSF	0.076	0.034	0.110	0.037	0.083	0.120	1.680
Light Logistics (ITE 150)	KSF	0.237	0.063	0.300	0.080	0.240	0.320	3.560
Utilities Servicing Station (ITE 170)*	KSF	0.720	0.080	0.800	0.342	0.418	0.760	8.000
Fire Station**	Site	20	8	28	10	20	29	137
Gas Station w Convenience Store (ITE 945)	Pumps	5.08	5.08	10.16	6.76	6.76	13.51	162.78
Convenience Store (ITE 851)	KSF	33.52	33.52	67.030	26.73	25.68	52.41	737.99
Existing Land Uses								
Single-Family Dwellings (ITE 210)	DU	0.188	0.563	0.750	0.630	0.370	1.000	9.520
Utilities Servicing Station (ITE 170)*	KSF	0.720	0.080	0.800	0.342	0.418	0.760	8.000

* Note: A.M. directionality taken from table for trips/employee. Daily is assumed to be ten time peak-hour rates

** Fire Station rate is based on the average of the following three traffic studies:

Fehr and Peers, *Loyola Marymount University Master Plan Project*, City of Los Angeles Department of Transportation, 2009, Table 5.

LLG Engineers, *Peaceful Valley Ranch*, County of San Diego, 2007, page 11.

McMahon, *Upper Dublin Fire House*, Montgomery County, Pennsylvania, 2010, page 15.

KSF = Thousand Square Feet

DU = Dwelling Unit

ADT = Average Daily Trips

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

The project trip generation for the proposed project and existing land uses on the site is shown in Table 4.15.N.

Table 4.15.N: Project Trip Generation for Proposed and Existing Land Uses

Land Use Type	Unit	Amount	AM Peak Hour			PM Peak Hour			ADT
			In	Out	Total	In	Out	Total	
Proposed Land Uses									
High-Cube Logistics Center (ITE 152) 40,400 KSF	KSF	40,400	3,066	1,378	4,444	1,503	3,345	4,848	67,872
Light Logistics (ITE 150) 200 KSF	KSF	200	47	13	60	16	48	64	712
SCG Valve/Metering Station (ITE 170) 0.15 KSF	KSF	0.15	0	0	0	0	0	0	1
SDG&E Gas Compression Station (ITE 170) 30.8 KSF	KSF	30.8	22	2	25	11	13	23	247
Fire Station 1 Site	Site	1	20	8	28	10	20	29	137
Gas Station w Convenience Store (ITE 945) 12 Pumps	Pumps	12	5	5	11	10	10	21	219
Convenience Store (ITE 851) 3 KSF	KSF	3	11	11	22	13	12	25	354
TOTAL PROPOSED			3,172	1,417	4,590	1,563	3,449	5,010	69,542

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Table 4.15.N: Project Trip Generation for Proposed and Existing Land Uses

Land Use Type	Unit	Amount	AM Peak Hour			PM Peak Hour			ADT
			In	Out	Total	In	Out	Total	
Existing Land Uses									
Single-Family Dwellings (ITE 210) 7 DU	DU	7	1	4	5	4	3	7	67
SCG Valve/Metering Station (ITE 170) 0.15 KSF	KSF	0.15	0	0	0	0	0	0	1
SDG&E Gas Compression Station (ITE 170) 30.8 KSF	KSF	30.8	22	2	25	11	13	23	247
TOTAL EXISTING			24	6	30	15	16	31	314

* Note: A.M. directionality taken from table for trips/employee. Daily is assumed to be ten time peak-hour rates.

KSF = Thousand Square Feet

DU = Dwelling Unit

ADT = Average Daily Trips

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, March September 2014.

Figure 4.15.7 compares the trip generation estimate for the proposed project as used in this EIR to the trip generation assuming implementation of the NAIOP and Sketchers survey-derived rates. As shown in the figure, the trip generation estimate for the proposed project is much higher in comparison to the estimates using either the NAIOP or Sketchers rates, thus meeting CEQA’s standard of substantial evidence.

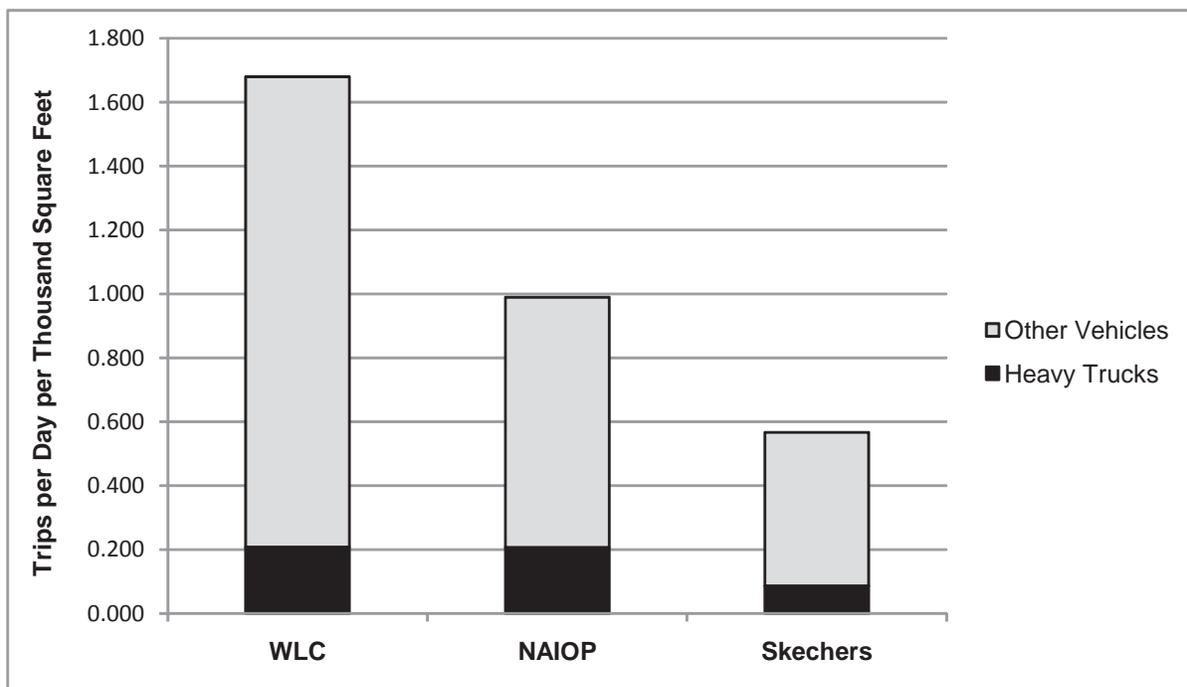


Figure 4.15.7: Comparison of Trip Generation from Southern California Sources

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

As shown in previously referenced Table 4.15.N, the project is estimated to generate a net total of approximately 69,542 daily trips with approximately occurring during a.m. peak hour and 5,010 occurring during the p.m. peak hour. Daily and hourly trip counts take into account only the trips generated by the project. Refinements to raw trip generation estimated using the ITE rates have been made to provide a more detailed breakdown of trips by vehicle mix, similar to the existing baseline count

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data. Per City of Moreno Valley standard practice, vehicle mix percentages were obtained from the City of Fontana Truck Trip Generation Study, which is the recognized source throughout the County of Riverside and the County of San Bernardino for estimating the vehicle mix associated with industrial and warehouse uses. For this reason, the vehicle-mix from the Fontana Truck Trip Generation Study has been applied to ITE trip generation rates in order to determine the proposed project's passenger car and truck trip generation mix. Table 4.15.O shows the project trips by vehicle type. The PCE project trips by vehicle type differ between the surface street and freeway analyses because the freeway analysis uses a PCE factor of 1.5 for medium and heavy trucks while the surface street analysis uses PCE factors of 2.0 and 3.0 for medium and heavy trucks, respectively.

Table 4.15.O: Project Trips by Vehicle Type

Vehicle Type	AM Peak Hour			PM Peak Hour			Vehicles	Surface Street PCEs	Freeway PCEs
	In	Out	Total	In	Out	Total			
PHASE 1									
Autos	1,197	466	1,663	412	1,396	1,807	30,879	30,879	30,879
Light Trucks	97	55	152	77	90	167	1,340	2,009	2,009
Medium Trucks	130	74	204	103	121	223	1,792	3,585	2,689
Heavy Trucks	345	197	542	273	320	594	4,760	14,279	7,140
Total	1,769	792	2,561	866	1,927	2,792	38,771	50,753	42,717
PHASE 2									
Autos	923	356	1,279	313	1,075	1,388	23,835	23,835	23,835
Light Trucks	75	43	118	60	70	130	1,046	1,569	1,569
Medium Trucks	100	57	157	79	93	173	1,389	2,778	2,083
Heavy Trucks	266	151	418	211	248	459	3,680	11,040	5,520
Total	1,365	606	1,971	663	1,486	2,149	29,950	39,222	33,007
FULL PROJECT BUILD-OUT									
Autos	2,120	821	2,941	726	2,471	3,195	54,714	54,714	54,714
Light Trucks	172	98	271	137	160	297	2,385	3,578	3,578
Medium Trucks	230	131	361	182	214	396	3,181	6,363	4,772
Heavy Trucks	611	348	959	484	568	1,052	8,440	25,319	12,660
Total	3,134	1,398	4,532	1,529	3,413	4,941	68,721	89,975	75,724

PCE = passenger car equivalent.

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

The City of Moreno Valley Transportation Engineering Division performed their own survey of trip generation at six warehouses in the City to address concerns over unrealistically high trip generation forecasts for warehouse oriented projects. This study used counts collected in Fall 2013, after the Draft EIR for the proposed project had been sent out for public review in February 2013. The City study confirmed that the vehicle mix for the Heavy Warehouse category in the Fontana *Truck Trip Generation Study* (i.e. the data used for the WLC TIA) produces a good, but conservative (i.e. somewhat high), estimate of truck trips percentages for high-cube warehouses while the Fontana Truck Terminal category produces an obvious over-estimate of truck traffic (see Figure 4.15.8).

For comparative purposes, the trip generation estimate for the proposed project was compared to the trip generation for existing approved land uses for the project area as shown in the final traffic study for the Moreno Highlands Specific Plan. The Moreno Highlands Specific Plan would generate 178,608 average vehicle trips per day, or more than two-and-a-half times as many trips (256%) as are forecast for the WLC (69,542 average vehicle trips per day). The Moreno Highlands traffic studies did not distinguish between car and truck traffic, and so did not provide a forecast in terms of PCEs. However, even if the Moreno Highlands plan were to generate no truck trips at all (only auto trips), it

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would still generate nearly twice as many PCEs trips as the WLC. Thus, the World Logistics Center would generate substantially less traffic than the existing approved land uses for the project area as envisioned in the existing Moreno Highlands Specific Plan.

Trip distribution represents the probable starting and ending locations of traffic generated by a project. Trip distribution is heavily influenced by the geographical location of a project site in relation to local and regional land uses (i.e., the starting and ending locations), and access to a project site from the local and regional transportation system. The proposed project’s trip distribution was developed for both passenger cars and trucks.

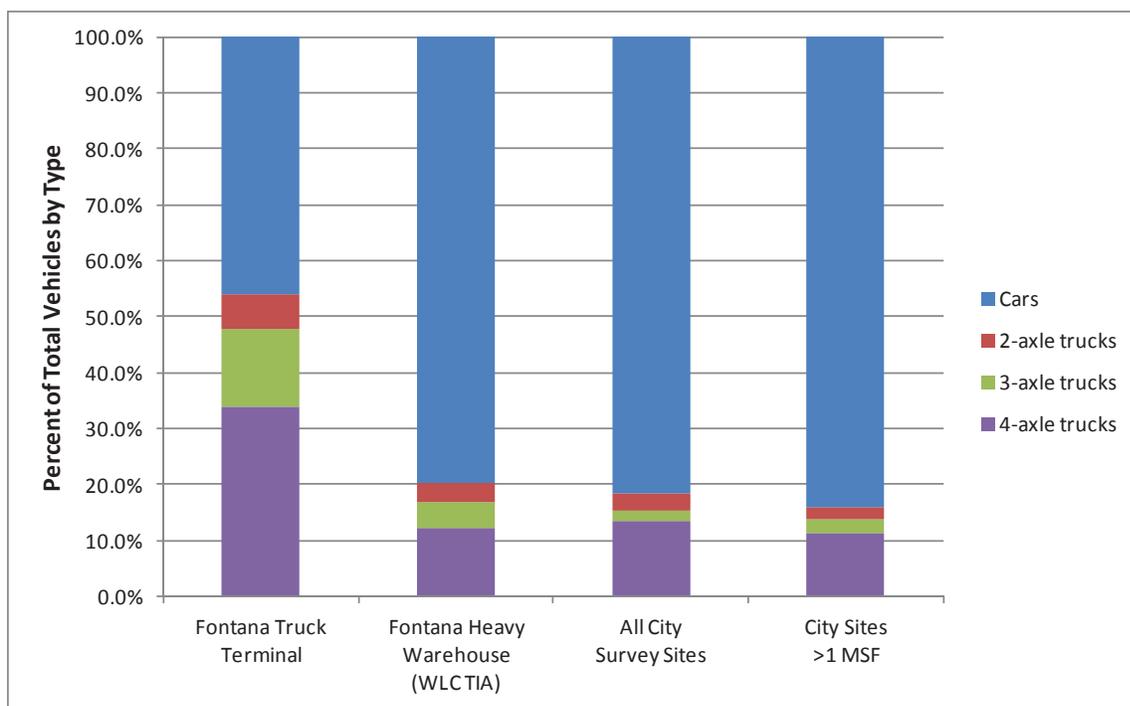


Figure 4.15.8: Comparison of Vehicle Mixes from the City Survey and the Fontana Study
Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

The Fontana Truck Trip Generation Study¹ found that 80 percent of the vehicles entering or leaving warehouse sites are passenger cars, nearly all of which are used for commute trips by employees of the warehouses. Most of these trips are local trips resulting from current and future residents of Moreno Valley who would be afforded the opportunity to work locally with very short commutes as well as residents of neighboring cities who would access the project site using the local arterial network. Other passenger car trips would be generated by workers coming from more distant areas. In most cases, these trips would access the project site via SR-60 in the off-peak direction (i.e., commuters traveling to the project site from Los Angeles or Orange Counties).

Truck Distribution. The truck trip distribution patterns have been developed based on the anticipated travel patterns for the proposed project’s high-cube logistics warehousing trucks. Since the internal trips, the port-related trips, and the majority of external trips (all but those on I-10) use routes west of the project site, it is anticipated that a large majority of the WLC truck traffic will be oriented to the west of the project, with a much smaller amount to and from the east. In addition, the majority of project truck traffic would use the freeway system to enter and leave the project area due

¹ Truck Trip Generation Study, City of Fontana, August 2003.

to truck routing restrictions. Based on these factors, truck trips generated by the proposed project would be oriented in the following manner:

- 82 percent to/from the west via one or more freeways;
- 6 percent to/from the north via surface streets;
- 9 percent to/from the east utilizing SR-60 and I-10; and
- 3 percent to/from the southeast via surface streets.

Auto Distribution. Figure 29 of the WLC TIA indicates that daily passenger vehicle traffic will distribute in the following directions:

- 44 percent to/from the west on SR-60;
- 9 percent to/from the east on SR-60 (east of Gilman Springs Road);
- 11 percent to/from the southeast on Gilman Springs Road;
- 29 percent to/from the south on Cactus Avenue; and
- 7 percent to/from the north along Theodore Street.

Moreno Valley currently has a jobs/housing imbalance that results in long westbound commutes for thousands of city residents every workday. The WLC would create approximately 25,000 new jobs; nearly doubling the number of jobs in Moreno Valley. This would have four effects on commute patterns. First, many current and future residents of Moreno Valley would be able to work locally with very short commute trips.

Second, residents of neighboring cities who work at the WLC would have short commutes and, importantly, be able to access the site using the arterial road network. This is consistent with the policies of the Western Riverside Council of Governments and the Riverside County Transportation Commission to promote use of the arterial road network as an alternative to freeways. Tests with the RIVTAM model (see Figure 29 of the WLC TIA) suggest that nearly half of auto traffic associated with the WLC would be on surface streets; i.e., not on freeways.

Third, workers coming from more distant locations would, in most cases, be traveling on freeways in the off-peak direction; i.e., commuters traveling to the WLC from Los Angeles or Orange Counties would be headed eastbound in the morning and westbound in the evening. This would enable them to take advantage of the existing unused off-peak capacity of freeways, since the freeways were sized for flows in the peak direction.

Fourth, because the RIVTAM model assumes that WLC employees would work elsewhere if the WLC project were not implemented, then the availability of jobs at the east end of Moreno Valley would reduce the number of workers driving long commutes to distant jobsites to the west and southwest. Although the project would increase freeway auto traffic eastbound in the morning, it would also decrease the traffic in the more congested westbound direction. In the evening the pattern would reverse, with the project relieving traffic in the congested eastbound direction. Therefore, the WLC project would have a net beneficial impact on the regional freeway auto traffic. This is consistent with the policies of SCAG, WRCOG, and other regional governments and agencies to encourage better jobs/housing balances as a way to reduce peak directional flows on the regional freeway system.

The assignment of traffic from the project area to the adjoining roadway system is based upon the project trip generation, trip distribution, and the arterial highway and local street system improvements

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that would be in place by the time of initial occupancy of the project. For more information on project trip generation and distribution for both trucks and passenger vehicles over and above the summary above, see Sections 4.C, 4.D, and 4.E in the project TIA (PB 2013, EIR Appendix L). It is important to note that all trucks must use established truck routes within the City of Moreno Valley by the Municipal Code, while passenger vehicles will distribute onto the freeway and local streets depending on their destinations.

It should be noted that all technical studies based all or in part on traffic (i.e., air quality, greenhouse gases, and noise) have used these same assumptions regarding trip generation, trip length, etc. from the project TIA for their assessments of project impacts.

Passenger Car Equivalents. The analytical methods used to forecast traffic impacts must take into account the driving characteristics of different classes of vehicles. This is typically done through the use of passenger car equivalent (PCE) factors, which convert the number of heavy vehicles in the traffic stream into an equivalent number of passenger cars. The term PCE was first used in the 1965 *Highway Capacity Manual* (HCM), and was determined by comparing the relative number of passing of trucks by passenger cars in relation to number of passing of passenger car by passenger cars. According to the *HCM 2000*:

The entry of heavy vehicles-that is, vehicles other than passenger cars (a category that includes small trucks and vans)-into the traffic stream affects the number of vehicles that can be served. Heavy vehicles are vehicles that have more than four tires touching the pavement.

Trucks, buses, and recreational vehicles (RVs) are the three groups of heavy vehicles addressed by the methods in this manual. Heavy vehicles adversely affect traffic in two ways:

- *They are larger than passenger cars and occupy more roadway space; and*
- *They have poorer operating capabilities than passenger cars, particularly with respect to acceleration, deceleration, and the ability to maintain speed on upgrades.*

The second impact is more critical. The inability of heavy vehicles to keep pace with passenger cars in many situations creates large gaps in the traffic stream, which are difficult to fill by passing maneuvers. The resulting inefficiencies in the use of roadway space cannot be completely overcome. This effect is particularly harmful on sustained, steep upgrades, where the difference in operating capabilities is most pronounced, and on two-lane highways, where passing requires use of the opposing travel lane.

Grade is by far the most important determinant in the PCE factor to be used. The HCM's recommended PCE for trucks ranges from 1.5 for places with slopes of less than 2 percent up to 7.0 for places with steep grades more than a mile long. HCM's recommended PCE factors were used for the freeway analysis.

For the analysis of surface streets, the City's TIA guidelines mandate the use of PCE factors taken from the San Bernardino County CMP, 2003 Update. These are somewhat higher than the HCM rates; for example, HCM recommends 2 PCEs per heavy truck while the San Bernardino County CMP uses 3. This means that use of the San Bernardino County CMP PCE rates represents a deliberately conservative approach in the sense that the analysis will tend to over-state the impact of trucks on traffic conditions.

4.15.3.3 Year 2017 Conditions

Note: Due to a change in project conditions and phasing, the Year 2017 analysis was eliminated from the revised TIA and DEIR section. *The reader is referred to the original DEIR section for that analysis and related tables and figures.*

Note: The following analysis of potential rail service to the project site was added in response to comments on the Draft EIR.

Potential Rail Alternative. This section describes why rail service is not considered a viable option for reducing the traffic impacts of the WLC. This conclusion is based on several factors, including the physical constraints to bringing rail service to the WLC site, the cost of cargo movement by rail relative to movement by truck, capacity constraints in the rail system that the WLC branch line would tie into, and the minimal effect that rail service would have even if all other factors could be overcome. These factors are discussed in turn below.

The Possible Alignments for Bringing Rail Service to the WLC Site. The WLC site is not currently served by rail. The rail lines nearest the site are the Union Pacific Yuma Line (single-track in this area), the Riverside County Transportation Commission's San Jacinto Branch Line (single-track, currently inactive), and the BNSF double-track line through the City of Riverside (see TIA Figure 36).

There are four general alignment possibilities for a branch line to the WLC. Each alignment is inherent with significant problems as follows:

- Western Alignment – Alignments running from the BNSF line in Riverside to the WLC, an approximate distance of 15 miles, would have to run through built-up areas of the Cities of Riverside and Moreno Valley. The cost of acquiring right-of-way through these areas, and the impacts to the community (noise, traffic disruption, safety, division of the community, etc.) render such alignments unviable. Moreover, trains using the at-grade rail crossings in the City of Riverside already impose substantial delays on road traffic. In fact, in recent years the City of Riverside has sued the ports over the issue of traffic impacts from additional trains passing through the city. Adding more crossings and more trains would exacerbate this problem.
- Southern Alignment – It would be possible to avoid densely populated and built-out areas by connecting to the San Jacinto Branch Line south of March Air Reserve Base. However, the only way to avoid established communities would be to pass along the northern portion of the Lake Perris State Recreation Area. The alignment, approximately 10 miles in length, would be a major impact as it would require constructing and operating a rail line along the slopes of the Lake Perris State Recreation Area and potentially the San Jacinto Wildlife Area. There would also be traffic impacts at road crossings, potential grade issues, and grade separated crossings needed for drainage channels and I-215. The impacts and costs of this approach would be disproportionate to the benefit of removing WLC trucks from the freeways (which will be discussed in a later section).
- Northern Alignment – The shortest alignment to an existing rail line is to the north in the vicinity of Redlands Boulevard and connecting to the UP Yuma line near the intersection of Redlands Boulevard and San Timoteo Canyon Road, approximately five miles from the project site. This alignment would require extensive ROW acquisition, encounter very serious grade issues that would increase the length of track needed, result in environmental impacts on the Badlands, and require a grade separated crossing of SR-60. The impacts and costs of this approach would be disproportionate to the benefit of removing WLC trucks from the freeways.

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- Eastern Alignment – The final possibility would be to connect to the UP Yuma line along an alignment parallel to SR-60. This alignment would connect to the existing rail network near the Morongo Golf Club at Tukwet Canyon, approximately five miles to the east of the WLC site. The eastern alignment would be affected by the same drawbacks as the northern alignment, with the addition of the need to construct a bridge over San Timoteo Creek.

As can be seen from the discussion above, providing rail service to the WLC along any of the possible alignments would in itself create serious environmental impacts.

Relative Costs of Truck and Rail Service. The loading and unloading of rail cargos requires special equipment and handling and can only be performed at specialized places, which adds to the cost of shipping goods by rail. On the other hand, the actual movement of goods by rail is more energy-efficient and less expensive than movement by truck. This combination of relatively high fixed costs at each end of a trip with low variable costs for the distance traveled means rail can be a less expensive way to ship cargo than truck, but only if the shipping distance is sufficiently long.

The break-even distance between rail and truck shipping has been the subject of several studies. The industry rule-of-thumb is that the rail becomes economically viable when cargos are shipped more than 500 miles. For example, the National Rail Plan, a nationwide guiding document from the U.S. Department of Transportation Federal Railroad Administration, has set the freight rail goal to, “Develop strategies to attract 50 percent of all shipments 500 miles or greater to intermodal rail.” In addition, the Plan highlights the importance that trucks have in conjunction with rail when moving freight, as trucks “excel in providing time-sensitive delivery services for high-value goods being transported over medium and short haul distances.” A local example is the Ports of Long Beach/Los Angeles Rail Master Planning Study, which indicates that rail loaded with two levels of shipping containers, “traditionally competes well with trucks at distances greater than 500 miles.” The San Pedro Bay Ports Rail Market Study shows the break-even point between truck and rail freight transport beginning east of Las Vegas and Phoenix, and north of the Bay Area. For shipments between the Ports of Los Angeles and Long Beach and the WLC, a distance of about 70 miles, shipping by rail would be far more expensive than by truck. Even if a rail line were built to the WLC, it would be uneconomical to use it for trips to and from the ports.

Capacity Constraints in the Rail System. If a rail line could be built to the WLC site and tenants could be induced to use it despite higher costs, this would only be helpful if the regional rail system had sufficient capacity to accommodate WLC freight without detriment to other users.

In fact, there are serious capacity constraints in the rail network in the Los Angeles Basin. Among other things, both BNSF and UP rail operations are already capacity-constrained on the lines between the ports and western Riverside County. Two studies, completed in the early 2000s and using the year 2000 as the existing condition, found that many of the rail lines were already operating near capacity. The studies evaluated 10 and 25 years of projected growth on the network and found that within 10 years (of the date of the study) the network would be over capacity. Without capacity increasing improvements, 10 years of train traffic growth was forecast to increase delay more than six-fold. This did not include additional delays that would be caused by trains serving the WLC.

The Los Angeles-Inland Empire Railroad Main Line Advanced Planning Study from October 2002 found that the “region’s rail system is inadequate for forecast train traffic.” The study presented other findings that illustrate the near-capacity state of the rail network, for example, “... just 25 percent of the forecast 2010 traffic is sufficient to roughly double the average delay per train, to 67.6 minutes for BNSF freight and 54.4 minutes for UP freight.” This occurs because small increases in train traffic result in disproportionate delays as the network nears capacity.

Several minor improvements to the rail network have been made since the 2002 study. However, accommodating estimated future demand in the year 2025 by providing capacity improvements alone would be costly; to meet future demand without rerouting would require capacity of some segments to be increased from two to four tracks. Therefore, an approach has been developed to revise train routing on the existing rail network and make limited capacity-increasing improvements. Even the limited improvements are estimated to cost over \$2 billion.

The fact that the rail system has limited capacity to accommodate additional traffic means that potential users have to be prioritized so that the capacity can be allocated efficiently. Highest priority would be for long-distance rail service direct from the ports. Short-distance cargo trips between the ports and the WLC would receive much lower priority than long-distance shipments. If regional passenger trains (e.g., Metrolink) share the tracks with freight trains, as is the case for some lines, then service to WLC would drop even further on the priority list. Based on existing capacity of the rail network and projected growth, the studies indicated that the rail network would be over capacity without further capital investments, which is beyond the scope of the WLC project.

Minimal Reduction in Traffic. Assuming that a rail line could be built to the WLC site and assuming that WLC freight could be accommodated by the rail network and that the costs for these things could be covered by subsidies or by increasing the prices on goods moved through the WLC, the question must be asked, “how much of a reduction in truck traffic impacts would be achieved?”

The answer is, “very little.” As was discussed earlier, the economics of freight shipment make rail viable only for trips of 500 miles or more. As is described in the TIA prepare for this EIR (Chapter 12, Section F), between 2 and 7 percent (depending on the year) of the truck trips beginning or ending in WLC go to the ports and these trips have no significant impact on freeway LOS for most of their lengths. So the effect of rail service on reducing truck impacts would be very small.

Conclusions About the Rail Alternative. This analysis of the rail alternative found that bringing rail service to the site would be very costly, result in serious environmental impacts, create major disruption to existing communities, and take many years to design, acquire right-of-way, and construct. Even if a line were built, both economics and system constraints would deter its use for cargos between the WLC and the ports. Even if built and used, rail service would have very little effect on reducing the traffic impacts of the WLC. Based on these considerations, rail service was not included in the design of the WLC and is not discussed further in this EIR.

4.15.3.4 Year 2022 Conditions

Note: The analysis of Year 2022 conditions in the original DEIR was based on different project characteristics (i.e., +1 million square feet of warehousing) and different phasing. Therefore, the previous Year 2022 has been removed in its entirety and replaced with the following updated analysis. The reader is referred to the original DEIR section for the previous Year 2022 analysis.

Levels of service are discussed below for year 2022. As noted above, Phase 1 of the proposed project will be completed in 2022 and includes 21,450,000 square feet of logistics warehouse uses. This is approximately 52 percent of the total project building space. The internal road system will be partially built out, with east-west through traffic served by the Cactus Avenue Extension and Streets C and E. Theodore Street would serve north-south traffic as it does today. As discussed previously, roadway projects that are either under construction or are funded and planned for implementation in the short-term (i.e., improvement projects on the FTIP and the RTP’s Financially Constrained Project list) and therefore reasonably assured of being constructed within the scenario timeframe were added.

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Year 2022 Without Project Levels of Service. An intersection level of service analysis was conducted to determine intersection performance under opening year 2022 cumulative conditions. Table 4.15.P summarizes the levels of service for opening year cumulative conditions at study area intersections. As shown on Table 4.15.P, the same 12 intersections that exceeded the City's LOS standards under Existing No Project Conditions also exceed the LOS standards under 2022 No Project conditions. In addition, 20 other intersections were forecast to operate at LOS D or worse. The intersections that were forecast to exceed the City's LOS standards under opening year 2022 cumulative conditions were:

- Redlands Boulevard/Locust Avenue (a.m. and p.m.);
- Redlands Boulevard/SR-60 Westbound ramps (a.m. and p.m.);
- Theodore Avenue/Fir Avenue (p.m.);
- Oliver Street/Alessandro Boulevard (a.m. and p.m.);
- Redlands Boulevard/Alessandro Boulevard (a.m.);
- Moreno Beach Drive/Ironwood Avenue (a.m.);
- Moreno Beach Drive/SR-60 Eastbound ramps (a.m.);
- Lasselle Street/Iris Avenue (p.m.);
- Krameria Avenue; Perris Boulevard (a.m. and p.m.);
- Lasselle Street/Cactus Avenue (a.m. and p.m.);
- Frederick Street/Alessandro Boulevard (p.m.);
- Graham Street/Alessandro Boulevard (p.m.);
- Perris Boulevard/Alessandro Boulevard (p.m.);
- Graham Street/Cactus Avenue (a.m. and p.m.);
- Alessandro Boulevard/Sycamore Canyon Boulevard (p.m.);
- I-215 Southbound ramps/Cactus Avenue (p.m.);
- Elsworth Street/Cactus Avenue (p.m.);
- Martin Luther King Boulevard/Canyon Crest Drive (a.m.);
- Martin Luther King Boulevard/I-215 Northbound ramps (a.m.);
- Arlington Avenue/Victoria Avenue (a.m. and p.m.);
- Alessandro Boulevard/Chicago Avenue (a.m. and p.m.);
- Ramona Expressway/Evans Road (a.m.);
- Evans Road/Rider Street (a.m.);
- Placentia Avenue/Perris Boulevard (p.m.);
- Gilman Springs Road/Bridge Street (a.m.);
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road (a.m. and p.m.);
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road (a.m. and p.m.);
- W. 6th Street/California Avenue (a.m. and p.m.);
- San Timoteo Canyon Road/Alessandro Road (a.m. and p.m.);

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- San Timoteo Canyon Road/Live Oak Canyon Road (a.m. and p.m.);
- Redlands Boulevard/San Timoteo Canyon Road (a.m. and p.m.); and
- W. Crescent Avenue/Alessandro Road (a.m. and p.m.).

Table 4.15.P: Year 2022 Without Project Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
1	Theodore St/Street F	N/A	N/A	Non-Existent		Non-Existent	
2	Cactus Avenue Extension/Street E	N/A	N/A	Non-Existent		Non-Existent	
3	Theodore Str/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	10.0	A	10.3	B
4	Alessandro Blvd (Street C)/Street F	N/A	N/A	Non-Existent		Non-Existent	
6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	SIGNAL	5.8	A	7.9	A
9	Gilman Springs Rd/Eucalyptus Ave	N/A	N/A	Non-Existent		Non-Existent	
10	Redlands Blvd/Locust Ave	C	CSS	> 180.0	F	> 180.0	F
11	Redlands Blvd/Ironwood Ave	D	SIGNAL	34.9	C	31.7	C
12	Theodore Street/Ironwood Avenue	D	CSS	13.0	B	17.8	C
13	Redlands Blvd/SR-60 WB ramps	D	CSS	> 180.0	F	> 180.0	F
14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	8.9	A	15.9	B
15	Theodore Str/SR-60 WB ramps	D	CSS	12.2	B	19.2	C
16	Theodore Str/SR-60 EB ramps	D	CSS	12.2	B	23.2	C
17	Quincy Str/Fir Ave	N/A	N/A	Non-Existent		Non-Existent	
18	Redlands Blvd/Eucalyptus Ave (Fir)	N/A	N/A	Non-Existent		Non-Existent	
19	Theodore St/Fir Ave (Eucalyptus)	D	CSS	9.8	A	41.7	E
20	Oliver Str/Alessandro Blvd	C	CSS	81.3	F	67.7	F
21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	17.6	B	18.5	B
22	Quincy Str/Alessandro Blvd	N/A	N/A	Non-Existent		Non-Existent	
23	Redlands Blvd/Alessandro Blvd	C	AWS	30.2	D	14.1	B
24	Oliver Str/Cactus Ave	D	SIGNAL	32.5	C	25.7	C
25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	18.5	B	18.9	B
26	Quincy Str/Cactus Ave	N/A	N/A	Non-Existent		Non-Existent	
27	Redlands Blvd/Cactus Ave	C	AWS	13.4	B	9.5	A
28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	19.8	B	18.9	B
29	Heacock Str/Ironwood Ave	D	SIGNAL	30.9	C	36.9	D
30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	33.7	C	47.5	D
31	Heacock St/SR-60 EB Ramps	D	SIGNAL	21.1	C	24.7	C
32	Sunnymead Blvd & Perris Blvd	D	SIGNAL	29.9	C	39.2	D
33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	31.8	C	21.7	C
34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	27.7	C	33.4	C
35	Moreno Beach Dr/Locust Ave	C	CSS	9.2	A	9.6	A
36	Moreno Beach Drive & Ironwood Avenue	D	SIGNAL	90.2	F	51.0	D
37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	88.7	F	37.8	D
38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	50.8	D	53.5	D
39	Iris Ave/Perris Blvd	D	SIGNAL	54.0	D	38.6	D
40	Kitching St/Iris Ave	C	SIGNAL	28.9	C	23.9	C
41	Lasselle Str/Iris Ave	D	SIGNAL	32.8	C	68.7	E
42	Nason Str/Iris Ave	C	SIGNAL	8.2	A	11.7	B
43	Oliver Str/Iris Ave	D	SIGNAL	28.9	C	22.0	C
44	Via Dell Lago/Iris Ave	C	SIGNAL	8.8	A	8.3	A

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Table 4.15.P: Year 2022 Without Project Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
45	Krameria Ave/Perris Blvd	D	SIGNAL	> 180.0	F	> 180.0	F
46	Kitching Str/Krameria Ave	D	SIGNAL	29.2	C	40.0	D
47	Lasselle Str/Krameria Ave	D	SIGNAL	32.9	C	15.3	B
48	Kitching Str/Alessandro Blvd	D	SIGNAL	28.5	C	25.7	C
49	Lasselle Str/Alessandro Blvd	D	SIGNAL	56.1	E	41.9	D
50	Morrison Str/Alessandro Blvd	D	SIGNAL	9.3	A	9.2	A
51	Nason Str/Alessandro Blvd	D	SIGNAL	31.5	C	29.5	C
52	Kitching Str/Cactus Ave	C	SIGNAL	32.2	C	26.2	C
53	Lasselle Str/Cactus Ave	C	SIGNAL	64.0	E	52.8	D
54	Morrison Str/Cactus Ave	N/A	N/A	Non-Existent		Non-Existent	
55	Nason Str/Cactus Ave	D	SIGNAL	30.6	C	32.8	C
56	Frederick Str/Alessandro Blvd	D	SIGNAL	30.4	C	61.7	E
57	Graham Str/Alessandro Blvd	D	SIGNAL	32.4	C	76.8	E
58	Heacock Str/Alessandro Blvd	D	SIGNAL	41.8	D	48.9	D
59	Indian Str/Alessandro Blvd	D	SIGNAL	24.7	C	33.5	C
60	Perris Blvd/Alessandro Blvd	D	SIGNAL	50.5	D	113.4	F
61	Frederick Str/Cactus Ave	D	SIGNAL	19.1	B	15.6	B
62	Graham Str/Cactus Ave	D	SIGNAL	148.3	F	66.6	E
63	Heacock Str/Cactus Ave	D	SIGNAL	42.5	D	32.9	C
64	Indian Str/Cactus Ave	C	SIGNAL	28.8	C	22.0	C
65	Perris Blvd/Cactus Ave	D	SIGNAL	35.7	D	32.7	C
66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	38.2	D	58.3	E
67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	10.9	B	8.9	A
68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	25.5	C	23.3	C
69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	17.3	B	35.4	D
70	Day Str/Alessandro Blvd	D	SIGNAL	10.7	B	43.0	D
71	Elsworth Str/Alessandro Blvd	D	SIGNAL	20.7	C	34.7	C
72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	30.5	C	89.5	F
73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	10.8	B	12.6	B
74	Elsworth Str/Cactus Ave	D	SIGNAL	31.3	C	175.7	F
75	Central Ave/Lochmoor Dr.	D	SIGNAL	19.6	B	30.3	C
76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	27.8	C	29.8	C
77	SR-60 EB Ramps/Central Ave	D	SIGNAL	10.9	B	11.7	B
78	SR-60 WB Ramps/Central Ave	D	SIGNAL	6.6	A	7.4	A
79	Alessandro Blvd/Trautwein Rd.	D	SIGNAL	29.8	C	15.5	B
80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	33.2	C	48.3	D
81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	34.6	C	48.4	D
82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	9.2	A	16.7	B
83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	100.0	F	41.2	D
84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	9.6	A	5.6	A
85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	27.4	D	15.0	C
86	Central Ave/Chicago Ave	D	SIGNAL	34.5	C	40.8	D
87	Central Ave/El Cerrito Dr	D	SIGNAL	13.2	B	17.3	B
88	Central Ave/Canyon Crest Dr	D	SIGNAL	36.3	D	51.2	D
89	Chicago Ave/Country Club Dr	D	SIGNAL	9.4	A	7.1	A
90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	36.9	D	35.4	D

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				Delay	LOS	Delay	LOS
91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	22.1	C	31.3	C
92	Arlington Ave/Maude St	D	SIGNAL	14.3	B	13.5	B
93	Horace St/Arlington Ave	D	SIGNAL	19.7	B	10.1	B
94	Arlington Ave/Victoria Ave	D	SIGNAL	84.2	F	83.7	F
95	Alessandro Blvd/Chicago Ave	D	SIGNAL	64.5	E	114.7	F
96	Alessandro Blvd/Century Ave	D	SIGNAL	32.5	C	14.9	B
97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	29.5	C	20.5	C
98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	30.6	C	30.2	C
99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	33.3	C	25.5	C
100	Harley Knox Blvd/Evan Rd	N/A	N/A	Non-Existent		Non-Existent	
101	Ramona Expy/Indian St	E	SIGNAL	18.6	B	39.7	D
102	Ramona Expy/Perris Blvd	E	SIGNAL	34.3	C	31.2	C
103	Ramona Expy/Evans Rd	E	SIGNAL	139.7	F	41.6	D
104	Perris Blvd/Morgan St	D	SIGNAL	14.6	B	12.7	B
105	Evans Rd/Morgan St	C	SIGNAL	32.8	C	29.7	C
106	Perris Blvd/Rider St	C	SIGNAL	18.3	B	22.7	C
107	Evans Rd/Rider St	C	SIGNAL	34.4	C	30.3	C
108	Perris Blvd/Mid-County Pkwy WB Ramps	D	SIGNAL	29.2	C	20.8	C
109	Perris Blvd/Mid-County Pkwy EB Ramps	D	SIGNAL	19.2	B	32.4	C
110	Evans Rd/Mid-County Pkwy WB Ramps	D	SIGNAL	38.0	D	32.2	C
111	Evans Rd/Mid-County Pkwy EB Ramps	D	SIGNAL	14.6	B	25.9	C
112	Placentia Ave/Perris Blvd	D	SIGNAL	40.8	D	60.0	E
113	Evans Rd/Placentia Ave	N/A	N/A	Non-Existent		Non-Existent	
114	Evans Rd/Orange Ave	C	AWS	22.1	C	16.9	C
115	Evans Rd/Nuevo Rd	C	SIGNAL	32.0	C	32.2	C
116	Evans Rd/Ellis Ave	N/A	N/A	Non-Existent		Non-Existent	
117	Ellis Ave/I-215 SB Ramps	N/A	N/A	Non-Existent		Non-Existent	
118	Ellis Ave/SR-215 NB Ramps	N/A	N/A	Non-Existent		Non-Existent	
119	Evans Rd/San Jacinto Ave	N/A	N/A	Non-Existent		Non-Existent	
120	Park Center Blvd/Ramona Expy WB Ramps	N/A	N/A	Non-Existent		Non-Existent	
121	Park Center Blvd/Ramona Expy EB Ramps	N/A	N/A	Non-Existent		Non-Existent	
122	Bridge St/Ramona Expy	N/A	N/A	Non-Existent		Non-Existent	
123	Gilman Springs Rd/Bridge Str	C	CSS	22.3	C	25.7	D
124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	> 180.0	F	108.0	F
125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	> 180.0	F	123.3	F
126	Ramona Expy/Sanderson Ave	D	SIGNAL	35.7	D	24.4	C
127	Potrero Blvd/SR-60 WB Ramps	N/A	N/A	Non-Existent		Non-Existent	
128	Potrero Blvd/SR-60 EB Ramps	N/A	N/A	Non-Existent		Non-Existent	
129	W 6th St/California Ave	C	AWS	31.8	D	55.0	F
130	W 6th St/Beaumont Ave	C	SIGNAL	15.7	B	25.3	C
131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	13.7	B	6.3	A
132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	> 180.0	F	125.1	F
133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	169.8	F	> 180.0	F

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Table 4.15.P: Year 2022 Without Project Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	> 180.0	F	> 180.0	F
135	W Crescent Ave/Alessandro Rd	C	CSS	27.7	D	16.2	C
136	W Sunset Dr/Alessandro Rd	C	AWS	10.9	B	11.1	B

Notes: "CSS" means cross-street is stop-controlled "AWS" means all-way stop

"Non-Existent" indicates that the intersection exists in some scenarios but not in the scenario being reported

denotes LOS exceeding the target threshold

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

The year 2022 without project roadway levels of service are based on daily V/C ratios for the study area roadway segments. Table 4.15.Q summarizes the results of this analysis and shows the following two study area roadway segments are projected to operate with unsatisfactory daily V/C ratios under year 2022 without project conditions. These same roadway segments also operate with unsatisfactory LOS in the existing condition:

- Gilman Springs Road:
 - Between Alessandro Boulevard and Bridge Street; and
 - Between SR-60 and Alessandro Boulevard.

A freeway segment level of service analysis was conducted to determine freeway performance under year 2022 conditions. Table 4.15.R summarizes the levels of service at study area segments under year 2022 no project conditions. As shown in Table 4.15.R, the following 33 study freeway segments are forecast to operate at an unsatisfactory level of service during either the a.m. or p.m. peak hour:

- Northbound or Eastbound:
 - SR-60 Reservoir Street to Ramona Avenue (p.m.);
 - SR-60 Ramona Avenue to Central Avenue (p.m.);
 - SR-60 Central Avenue to Mountain Avenue (p.m.);
 - SR-60 Euclid Avenue to Grove Avenue (p.m.);
 - SR-60 Grove Avenue to Vineyard Avenue (p.m.);
 - SR-60 Vineyard Avenue to Archibald Avenue (p.m.);
 - SR-60 Valley Way to Rubidoux Boulevard (p.m.);
 - SR-60 Rubidoux Boulevard to Market Street (a.m.);
 - SR-60 Market Street to Main Street (p.m.);
 - SR-60 Martin Luther King Boulevard to Central Avenue (a.m. and p.m.);
 - SR-60 Pigeon Pass Road/Frederick Street to Heacock Street (p.m.);
 - SR-60 Heacock Street to Perris Boulevard (p.m.);
 - SR-91 I-15 to McKinley Street (p.m.);
 - SR-91 Pierce Street to Magnolia Avenue (p.m.)
 - I-215 La Cadena Drive to Barton Road (p.m.); and
 - I-215 Barton Road to Mt. Vernon Avenue (a.m. and p.m.).

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Table 4.15.Q: Year 2022 Without Project Roadway Levels of Service

Roadway	From	To	LOS Standard*	Roadway Section**	Daily Volume	LOS
S-1	Theodore Street (A)	Ironwood Avenue	D	2U	3,133	A
S-2	Theodore Street (A)	Fir (Eucalyptus) Ave.	D	2U	6,689	A
S-3	Fir (Eucalyptus) Ave.	Theodore Street (A)	D	2U***	6,542	A
S-4	Eucalyptus Ave (B)	Gilman Springs Rd		Future Road		
S-5	Theodore Street (A)	Street E	D	2U	1,116	A
S-6	Street E	Cactus Ave Extension		Future Road		
S-7	Street F	Theodore Street (A)		Future Road		
S-8	Theodore Street (A)	Alessandro Blvd (Street C)	D	2U	1,116	A
S-9	Alessandro Blvd (Street E)	Theodore Street (A)	D	2U	3,778	A
S-10	Cactus Ave Extension	Cactus Ave.		Future Road		
S-11	Alessandro Blvd (Street C)	Street F	D	2U	2,321	A
S-13	Alessandro Blvd (Street C)	Gilman Springs Rd	D	2U	2,321	A
S-14	Alessandro Blvd	Redlands Blvd	D	2U	4,796	A
S-16	Gilman Springs Rd	Bridge Street	D	2U	15,512	F
S-17	Gilman Springs Rd	Alessandro Blvd (Street C)	D	2U	12,819	F
S-18	Redlands Blvd	Fir (Eucalyptus) Ave.	D	2U	11,042	D
S-19	Redlands Blvd	Alessandro Blvd	C	2U	8,416	B
S-20	Alessandro Blvd	Merwin Street	C	2U	3,886	A
S-21	Redlands Blvd	Cactus Ave.	C	2U	8,583	B
S-22	Cactus Ave.	Cactus Ave Extension	C	2U***	472	A

* LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways

** Section is the number of lanes, with "U" for "undivided" and "D" for "divided" roadways

*** Road currently has 2 lanes in one direction and 1 lane in the other. The capacity shown is based on the narrower direction.

Indicates LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.R: Year 2022 Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-2	SR-60	Reservoir St to Ramona Ave	7,210	30.5	D	7,830	35.1	E	8,770	43.3	E	7,150	30.1	D
F-3	SR-60	Ramona Ave to Central Ave	6,850	28.2	D	9,380	51.4	F	8,290	38.7	E	6,750	27.7	D
F-4	SR-60	Central Ave to Mountain Ave	7,590	33.0	D	9,350	51.0	F	6,340	25.4	C	6,990	29.1	D
F-5	SR-60	Mountain Ave to Euclid Ave	7,520	32.5	D	6,690	27.5	D	6,260	25.0	C	7,440	32.0	D
F-6	SR-60	Euclid Ave to Grove Ave	8,990	45.8	F	9,280	50.0	F	6,470	26.1	D	7,310	31.1	D
F-7	SR-60	Grove Ave to Vineyard Ave	8,170	37.6	E	9,530	53.6	F	6,330	25.4	C	7,920	35.5	E
F-8	SR-60	Vineyard Ave to Archibald Ave	8,080	36.5	E	9,470	52.7	F	7,670	33.6	D	7,550	32.8	D
F-9	SR-60	Archibald Ave to Haven Ave	7,590	32.8	D	6,630	27.2	D	See Weaving Analysis					
F-10	SR-60	Haven Ave to Miliken Ave	7,400	23.2	C	7,040	22.1	C	5,850	18.0	B	7,110	22.3	C
F-11	SR-60	Miliken Ave to I-15	5,280	20.3	C	4,530	17.4	B	5,550	21.6	C	7,050	29.2	D
F-12	SR-60	I-15 to Etiwanda Ave	4,580	17.6	B	3,440	13.3	B	4,490	13.7	B	5,850	17.9	B
F-13	SR-60	Etiwanda Ave to Mission Blvd/Country Village Rd	5,070	19.6	C	4,460	17.2	B	4,220	16.2	B	5,830	22.8	C
F-14	SR-60	Mission Blvd/Country Village Rd to Pedley Rd	4,600	17.7	B	3,560	13.8	B	4,240	16.3	B	5,850	22.9	C
F-15	SR-60	Pedley Rd to Pyrite St	4,620	17.8	B	3,710	14.4	B	3,290	12.6	B	5,010	19.2	C

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Table 4.15.R: Year 2022 Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-16	SR-60	Pyrite St to Valley Way	5,190	20.1	C	3,990	15.5	B	2,740	10.6	A	4,510	17.2	B
F-17	SR-60	Valley Way to Rubidoux Blvd	6,280	39.4	E	4,530	24.1	C	4,630	24.4	C	6,530	42.2	E
F-18	SR-60	Rubidoux Blvd to Market St	6,920	48.7	F	4,950	27.2	D	3,630	18.6	C	5,660	32.5	D
F-19	SR-60	Market St to Main St	6,450	41.6	E	7,260	56.8	F	5,890	34.4	D	6,820	46.5	F
F-20	SR-60	Main to SR-91	See Weaving Analysis						5,450	30.6	D	6,610	42.9	E
F-24	SR-60	Martin Luther King Blvd to Central Ave	8,440	41.5	E	9,140	53.5	F	7,060	23.7	C	7,680	25.5	C
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	6,450	25.7	C	7,270	30.8	D	7,390	31.9	D	8,510	40.3	E
F-27	SR-60	I-215 to Day St.	See Weaving Analysis						7,250	54.3	F	3,880	20.0	C
F-29	SR-60	Pigeon Pass Rd/Frederick St to Heacock St	3,520	29.2	D	4,200	39.3	E	3,460	28.5	D	3,860	34.0	D
F-30	SR-60	Heacock St to Perris Blvd	3,160	25.0	C	4,050	36.7	E	3,300	26.6	D	3,360	27.5	D
F-31	SR-60	Perris Blvd to Nason St	2,590	19.8	C	3,070	24.3	C	2,790	21.6	C	2,550	19.6	C
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	1,910	14.5	B	2,370	18.0	C	1,810	13.8	B	1,750	13.4	B
F-34	SR-60	Redlands Blvd to Theodore St	2,460	18.8	C	3,240	25.8	C	2,280	17.3	B	2,200	16.8	B

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Table 4.15.R: Year 2022 Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	2,310	19.2	C	2,770	23.6	C	2,180	18.0	C	1,850	15.3	B
F-37	SR-60	Jack Rabbit Trail to I-10/Potrero Blvd	2,070	15.8	B	2,820	21.8	C	2,190	16.7	B	1,690	12.9	B
F-39	SR-91	I-15 to McKinley St	7,190	22.3	C	10,400	38.6	E	7,280	30.9	D	7,330	31.0	D
F-40	SR-91	McKinley St to Pierce St	6,500	26.1	D	5,950	23.5	C	5,440	31.0	D	6,330	39.6	E
F-41	SR-91	Pierce St to Magnolia Ave	5,970	35.2	E	5,410	30.5	D	5,210	29.0	D	8,080	77.6	F
F-42	SR-91	Magnolia Ave to La Sierra Ave	See Weaving Analysis						See Weaving Analysis					
F-43	SR-91	La Sierra Ave to Tyler St	5,490	30.9	D	5,230	29.0	D	4,800	25.9	C	5,980	35.6	E
F-44	SR-91	Tyler St to Van Buren Blvd	6,600	26.6	D	5,980	23.6	C	6,170	24.7	C	7,420	31.6	D
F-45	SR-91	Van Buren Blvd to Adam St	6,700	27.2	D	5,250	20.3	C	5,810	22.9	C	7,160	29.9	D
F-46	SR-91	Adam St to Madison St	7,310	31.4	D	4,970	19.4	C	5,420	21.2	C	6,210	24.5	C
F-47	SR-91	Madison St to Indiana Ave/ Arlington Ave	6,710	27.6	D	4,970	19.4	C	4,780	25.8	C	5,550	31.2	D
F-49	SR-91	Central Ave to 14th St	5,910	34.9	D	5,070	27.7	D	4,340	16.8	B	4,530	17.3	B
F-51	SR-91	University Ave to Spruce St (off-ramp)	8,270	26.6	D	7,700	24.2	C	See Weaving Analysis			See Weaving Analysis		

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Table 4.15.R: Year 2022 Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-52	I-10	SR-60 to Beaumont Ave	4,390	16.8	B	6,080	24.1	C	5,610	21.9	C	5,370	20.7	C
F-53	I-10	Beaumont Ave to Pennsylvania Ave	4,450	17.1	B	6,240	24.9	C	5,470	21.3	C	5,270	20.3	C
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	4,640	17.8	B	6,480	26.2	D	5,920	23.3	C	5,480	21.2	C
F-55	I-10	Highland Springs Ave to Sunset Ave	4,560	17.5	B	6,210	24.8	C	5,690	22.3	C	5,200	20.1	C
F-56	I-10	Sunset Ave to 22nd St	4,470	17.2	B	5,960	23.5	C	5,450	21.2	C	5,090	19.7	C
F-57	I-10	22nd St to 8th St	4,380	16.8	B	5,800	22.8	C	5,320	20.6	C	5,110	19.6	C
F-58	I-10	8th St to Hargrave St	4,370	16.8	B	5,730	22.4	C	5,250	20.3	C	5,250	20.2	C
F-59	I-10	Hargrave St to Fields Rd	4,100	15.8	B	5,350	20.8	C	4,810	18.5	C	5,020	19.3	C
F-60	I-10	Fields Rd to Morongo Trail	3,770	14.5	B	5,080	19.6	C	4,600	17.7	B	4,830	18.6	C
F-61	I-10	Morongo Trail to Main St	3,410	13.1	B	4,670	18.0	B	4,110	15.8	B	4,240	16.3	B
F-62	I-10	Main St to Haugen-Lehmann Way	3,280	12.6	B	4,720	18.1	C	4,230	16.3	C	4,300	16.5	B
F-64	I-10	SR-111 to Tipton Rd	2,950	11.3	B	4,140	15.9	B	3,680	14.1	B	3,760	14.4	B
F-65	I-10	Tipton Rd to SR-62	2,810	10.8	A	4,170	16.0	B	3,700	14.2	B	3,770	14.4	B
F-66	I-215	Scott Rd to Newport Rd	2,850	14.5	B	4,330	22.4	C	3,670	18.6	C	2,500	12.7	B

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Table 4.15.R: Year 2022 Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-68	I-215	Newport Rd to MacCall Blvd	2,100	10.8	A	3,140	15.9	B	3,820	19.6	C	3,520	18.0	B
F-69	I-215	MacCall Blvd to Ethanac Rd	2,750	14.0	B	4,380	22.7	C	4,380	22.8	C	2,950	15.0	B
F-70	I-215	Ethanac Rd to SR-74	4,200	21.7	C	4,100	21.0	C	4,110	21.2	C	4,250	21.9	C
F-71	I-215	SR-74/Case Rd to Redlands Blvd	3,490	17.7	B	4,800	25.4	C	5,730	33.1	D	3,860	19.7	C
F-74	I-215	Columbia Ave to Center St	6,090	36.8	E	6,030	36.2	E	6,390	40.0	E	5,330	29.6	D
F-75	I-215	Center St to Iowa Ave/La Cadena Dr	5,830	34.1	D	5,800	33.8	D	6,880	46.9	F	5,560	31.6	D
F-76	I-215	Iowa Ave/La Cadena Dr to Barton Rd	5,690	32.7	D	6,130	37.3	E	6,700	44.2	E	5,570	31.7	D
F-77	I-215	Barton Rd to Mt Vernon Ave	5,980	35.6	E	6,550	42.5	E	6,720	44.4	E	5,610	32.0	D
F-78	I-215	Mt Vernon Ave/Washingt on St to I-10	5,770	22.5	C	6,660	27.0	D	7,080	29.2	D	5,890	23.1	C
F-80	I-215	Auto Plaza Dr/ Orange Show Rd to Mill St	4,490	17.2	B	5,500	21.2	C	4,790	18.2	C	4,140	15.8	B
F-83	I-215	Baseline Rd to Highland Ave/SR-210	3,030	15.4	B	4,060	20.8	C	5,280	29.0	D	4,700	24.9	C

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

- Southbound and Westbound:
 - SR-60 Reservoir Street to Ramona Avenue (a.m.);
 - SR-60 Ramona Avenue to Central Avenue (a.m.);
 - SR-60 Grove Avenue to Vineyard Avenue (p.m.);
 - SR-60 Valley Way to Rubidoux Boulevard (p.m.);
 - SR-60 Market Street to Main Street (a.m. and p.m.);
 - SR-60 Main Street to SR-91 (p.m.);
 - SR-60 Fair Isle Drive/Box Springs Road to I-215 (a.m. and p.m.);
 - SR-60 I-215 to Day Street (a.m.);
 - SR-91 McKinley Street to Pierce Street (p.m.);
 - SR-91 Pierce Street to Magnolia Avenue (p.m.);
 - SR-91 Magnolia Avenue to La Sierra Avenue (p.m.);
 - SR-91 La Sierra Avenue to Tyler Street (p.m.);
 - I-215 Columbia Avenue to Center Street (a.m.);
 - I-215 Center Street to Iowa Avenue/La Cadena Drive (a.m.);
 - I-215 Iowa Avenue/La Cadena Drive to Barton Road (a.m.); and
 - I-215 Barton Road to Mt. Vernon Avenue (a.m.).

A freeway weaving analysis was conducted on freeway segments where an on-ramp is closely followed by an off-ramp, and the two are joined by an auxiliary lane. Table 4.15.S summarizes the levels of service at weaving segments under opening year cumulative conditions. As shown on Table 4.15.S, the following six northbound or eastbound sections and one southbound or westbound sections are forecast to operate at unsatisfactory levels of service in either the a.m. peak or p.m. peak hour:

- Northbound or Eastbound:
 - SR-60 SR-71/ Garey Avenue to Reservoir Street (p.m.);
 - SR-60 Main Street to SR-91 (a.m. and p.m.);
 - SR-60 SR-91 to Blaine Street/3rd Street (p.m.);
 - SR-60 Central Avenue to Fair Isle Drive/Box Springs Road (p.m.);
 - SR-91 Arlington Avenue to Central Avenue (a.m.); and
 - I-215 SR-60 to Columbia Avenue (a.m. and p.m.).
- Southbound or Westbound:
 - SR-60 SR-91 to Blaine Street/3rd Street (p.m.).

Freeway ramp merge and diverge operations have been evaluated for year 2022 conditions. Table 4.15.T summarizes the levels of service under year 2022 no project conditions and shows the following three freeway ramp junction is forecast to operate at unsatisfactory levels of service in either the a.m. peak or p.m. peak hour:

- SR-60 eastbound On-Ramp from Central Avenue (p.m.).

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4.15.3.5 Year 2035 Cumulative without the Project

Note: Due to a change in project conditions and phasing, the Year 2035 analysis was completely revised in the updated TIA and this DEIR section. The reader is referred to the original DEIR section for that analysis and related tables and figures.

An intersection level of service analysis was conducted to determine intersection performance under Year 2035 Cumulative without project conditions. For the 2035 scenarios, the roadway projects from the FTIP and RTP included in the year 2022 network were also included in the 2035 network. The future circulation network from the City of Moreno Valley General Plan was also incorporated into the year 2035 network that are funded through the City's Development Impact Fee (DIF), Western Riverside Council of Governments' Transportation Uniform Mitigation Fee (TUMF), and improvements made directly by developers. It is reasonable to assume that these improvements will be in place parallel with buildout of the General Plan land uses, because most of the improvements will be funded through fees on the new developments. If other sites do not fully build out per the General Plan, then the LOS on the study streets and intersection would likely be better than shown in the TIA. Table 4.15.U summarizes the levels of service at study intersections under Year 2035 Cumulative without project conditions.

Table 4.15.U summarizes the levels of service at study intersections under Year 2035 Cumulative without project conditions and shows the following 36 study intersections are forecast to operate at an unsatisfactory level of service during either the a.m. or p.m. peak hour:

- Theodore Street/Ironwood Avenue (p.m.);
- Theodore Street/SR-60 Westbound ramps (a.m. and p.m.);
- Theodore Street/SR-60 Eastbound ramps (p.m.);
- Theodore Avenue/Fir (Eucalyptus) Avenue (p.m.);
- Redlands Boulevard/Alessandro Boulevard (a.m. and p.m.);
- Moreno Beach Drive/Locust Avenue (a.m. and p.m.);
- Moreno Beach Drive/SR-60 Eastbound Ramps (a.m. and p.m.);
- Iris Avenue/Perris Boulevard (a.m. and p.m.);
- Kitching Street/Iris Avenue (a.m. and p.m.);
- Lasselle Street/Iris Avenue (p.m.);
- Lasselle Street/Cactus Avenue (a.m.);
- Graham Street/Alessandro Boulevard (p.m.);
- Indian Street/Cactus Avenue (p.m.);
- Alessandro Boulevard/Sycamore Canyon Boulevard (p.m.);
- I-215 Southbound Ramps/Cactus Avenue (p.m.);
- I-215 Northbound Ramps/Cactus Avenue (a.m. and p.m.);
- Elsworth Street/Cactus Avenue (a.m. and p.m.);
- Central Avenue/Lochmoor Drive (p.m.);
- Alessandro Boulevard/Mission Grove Parkway (p.m.);
- Martin Luther King Boulevard/I-215 Northbound Ramps (a.m.);

Table 4.15.S: Year 2022 Without Project Weaving Segment Levels of Service

ID	Freeway	Weaving Segment	Northbound / Eastbound				Southbound / Westbound									
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour							
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS					
W-1	SR-60	SR-71/Garey Ave to Reservoir St	7,150	29.2	D	8,640	37.6	E	6,130	21.9	C	6,720	24.3	C		
W-9	SR-60	Haven Ave to Archibald Ave	See Basic Analysis				See Basic Analysis				6,330	24.4	C	7,330	29.3	D
W-20	SR-60	Main St to SR-91	7,350	36.6	E	7,370	38.0	E	See Basic Analysis							
W-21	SR-60	SR-91 to Blaine St/3rd St	6,010	24.2	C	9,760	42.3	E	7,720	29.4	D	9,290	36.9	E		
W-22	SR-60	Blaine St/3rd St to University Ave	5,710	21.6	C	7,210	31.3	D	5,700	21.1	C	8,280	32.0	D		
W-23	SR-60	University Ave to Martin Luther King	6,620	23.8	C	6,060	21.4	C	5,600	22.6	C	7,620	30.7	D		
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs	6,580	27.3	C	8,400	38.9	E	7,110	30.7	D	7,890	32.7	D		
W-27	SR-60	I-215 to Day St	4,000	14.6	B	5,280	19.9	B	See Basic Analysis							
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	3,890	16.6	B	5,130	23.2	C	4,970	34.3	D	4,860	32.7	D		
W-32	SR-60	Moreno Beach Dr to Nason St	2,330	14.2	B	2,880	18.1	B	2,410	14.5	B	2,190	13.2	B		
W-35	SR-60	Theodore St to Gilman Springs Rd	2,320	12.7	B	3,370	19.3	B	2,360	13.6	B	2,030	11.4	B		
W-42	SR-91	Magnolia Ave to La Sierra Ave	6,400	30.3	D	5,950	28.5	D	See Basic Analysis							
W-48	SR-91	Arlington Ave to Central Ave	7,220	39.0	E	3,680	17.9	B	4,510	21.2	C	5,050	24.1	C		
W-50	SR-91	14th St to University Ave	5,030	25.1	C	4,810	24.6	C	5,090	19.6	B	7,020	27.9	C		
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	See Basic Analysis				See Basic Analysis				5,020	14.7	B	8,850	26.7	C
W-73	I-215	SR-60 to Columbia Ave	6,840	37.8	E	6,540	35.8	E	7,040	33.4	D	6,110	28.8	D		
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,610	16.8	B	5,210	19.0	B	5,830	20.8	C	4,870	18.0	B		
W-81	I-215	Mill St to 2nd St	5,090	17.8	B	5,910	21.1	C	5,300	19.0	B	4,410	15.9	B		
W-82	I-215	5th St to Baseline Rd	3,760	12.7	B	4,450	15.2	B	4,540	16.0	B	3,490	12.3	B		
W-63	I-10	Haugen-Lehmann Way to SR-111	3,300	11.0	B	4,710	15.9	B	4,210	14.8	B	4,310	17.2	B		

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.T: Year 2022 Without Project Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp Segment	Ramp No. of Lanes	AM Peak Hour			PM Peak Hour			LOS
				Mainline Volume	Ramp Volume	Density (pc/mi/ln)	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	
R-1	SR-60 EB	On-Ramp from Martin Luther King Blvd	1	6,190	710	27.4	5,780	1,320	30.9	D
R-2	SR-60 EB	On-Ramp from Central Ave	1	8,170	710	28.8	9,010	1,120	35.1	F
R-3	SR-60 EB	Off-Ramp to Redlands Blvd	1	1,910	220	8.3	2,370	520	12.5	B
R-4	SR-60 EB	Loop On-Ramp from Redlands Blvd	1	1,690	90	17.1	1,850	210	19.4	B
R-5	SR-60 EB	Direct On-Ramp from Redlands Blvd	0		Does not exist in this Scenario			Does not exist in this Scenario		
R-6	SR-60 EB	Off-Ramp to Theodore St	1	2,460	250	24.5	3,240	150	31.7	D
R-7	SR-60 EB	Loop On-Ramp from Theodore St	1	2,210	110	23.1	3,090	270	31.7	D
R-8	SR-60 EB	Direct On-Ramp from Theodore St	0		Does not exist in this Scenario			Does not exist in this Scenario		
R-9	SR-60 EB	Off-Ramp to Gilman Springs Rd	2	2,320	330	14.5	3,370	650	21.0	C
R-10	SR-60 EB	On-Ramp from Gilman Springs Rd	1	1,990	270	14.7	2,720	140	19.8	B
R-11	SR-60 WB	Off-Ramp to Gilman Springs Rd	2	2,210	230	13.8	1,880	190	11.8	B
R-12	SR-60 WB	On-Ramp from Gilman Springs Rd	1	1,890	380	15.5	1,690	310	12.6	B
R-13	SR-60 WB	Off-Ramp to Theodore St	1	2,360	180	12.4	2,030	120	9.3	A
R-14	SR-60 WB	On-Ramp from Theodore St	1	2,180	100	21.0	1,910	290	20.2	C
R-15	SR-60 WB	Off-Ramp to Redlands Blvd	1	2,290	170	22.9	2,200	100	22.3	C
R-16	SR-60 WB	Loop On-Ramp from Redlands Blvd	1	2,110	440	23.3	2,100	380	22.8	C
R-17	SR-60 WB	Direct On-Ramp from Redlands Blvd	0		Does not exist in this Scenario			Does not exist in this Scenario		
R-18	SR-60 WB	Off-Ramp to Central Ave	2	7,110	410	26.5	7,890	530	29.8	D
R-19	SR-60 WB	Off-Ramp to Martin Luther King Blvd	1	7,060	510	16.3	7,680	430	17.6	B

Indicates that the LOS exceeds the target level
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014

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Table 4.15.U: Year 2035 Cumulative Without Project Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
IN-1	Theodore St/Street F	N/A	N/A	Non-Existent		Non-Existent	
IN-2	Street D/Street E	N/A	N/A	Non-Existent		Non-Existent	
IN-3	Theodore Ave/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	20.9	C	19.6	C
IN-4	Alessandro Blvd (Street C)/Street F	N/A	N/A	Non-Existent		Non-Existent	
IN-6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	SIGNAL	11.7	B	37.7	D
IN-9	Gilman Springs Rd/Eucalyptus Ave	NA	N/A	Non-Existent		Non-Existent	
IN-10	Redlands Blvd/Locust Ave	C	SIGNAL	5.4	A	16.6	B
IN-11	Redlands Blvd/Ironwood Ave	D	SIGNAL	45.0	D	48.2	D
IN-12	Theodore Street/Ironwood Avenue	D	CSS	22.9	C	> 180.0	F
IN-13	Redlands Blvd/SR-60 WB ramps	D	SIGNAL	5.7	A	7.5	A
IN-14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	5.1	A	7.3	A
IN-15	Theodore Str/SR-60 WB ramps	D	CSS	62.2	F	173.7	F
IN-16	Theodore Str/SR-60 EB ramps	D	CSS	13.5	B	> 180.0	F
IN-17	Quincy Str/Fir Ave	D	CSS	9.6	A	12.6	B
IN-18	Redlands Blvd/Eucalyptus Ave (Fir)	D	SIGNAL	7.2	A	15.6	B
IN-19	Theodore Ave/Fir Ave (Eucalyptus)	D	CSS	10.5	B	68.9	F
IN-20	Oliver Str/Alessandro Blvd	C	CSS	20.0	C	21.6	C
IN-21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	17.3	B	20.2	C
IN-22	Quincy Str/Alessandro Blvd	C	SIGNAL	4.2	A	3.7	A
IN-23	Redlands Blvd/Alessandro Blvd	C	AWS	137.4	F	74.7	F
IN-24	Oliver Str/Cactus Ave	D	SIGNAL	22.3	C	20.2	C
IN-25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	20.3	C	29.7	C
IN-26	Quincy Str/Cactus Ave	C	SIGNAL	3.9	A	3.7	A
IN-27	Redlands Blvd/Cactus Ave	C	AWS	14.3	B	13.5	B
IN-28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	23.5	C	16.6	B
IN-29	Heacock Str/Ironwood Ave	D	SIGNAL	31.6	C	35.2	D
IN-30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	30.5	C	23.1	C
IN-31	Heacock St/SR-60 EB Ramps	D	SIGNAL	12.3	B	19.4	B
IN-32	Sunnymead Blvd/Perris Blvd	D	SIGNAL	31.8	C	39.7	D
IN-33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	22.5	C	17.1	B
IN-34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	21.8	C	24.7	C
IN-35	Moreno Beach Dr/Locust Ave	C	CSS	29.4	D	37.9	E
IN-36	Moreno Beach Dr/Ironwood Ave	D	SIGNAL	46.6	D	50.4	D
IN-37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	113.9	F	155.8	F
IN-38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	28.8	C	31.6	C
IN-39	Iris Ave/Perris Blvd	D	SIGNAL	58.6	E	63.8	E
IN-40	Kitching St/Iris Ave	C	SIGNAL	65.8	E	126.3	F
IN-41	Lasselle Str/Iris Ave	D	SIGNAL	35.0	C	79.2	E
IN-42	Nason Str/Iris Ave	C	SIGNAL	18.5	B	21.7	C
IN-43	Oliver Str/Iris Ave	D	SIGNAL	24.5	C	25.1	C
IN-44	Via Dell Lago/Iris Ave	C	SIGNAL	7.0	A	7.2	A
IN-45	Krameria Ave/Perris Blvd	D	SIGNAL	27.8	C	52.6	D

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Table 4.15.U: Year 2035 Cumulative Without Project Intersection Levels of Service

ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
IN-46	Kitching Str/Krameria Ave	D	SIGNAL	35.3	D	41.7	D
IN-47	Lasselle Str/Krameria Ave	D	SIGNAL	32.2	C	14.5	B
IN-48	Kitching Str/Alessandro Blvd	D	SIGNAL	26.5	C	28.1	C
IN-49	Lasselle Str/Alessandro Blvd	D	SIGNAL	19.8	B	23.7	C
IN-50	Morrison Str/Alessandro Blvd	D	SIGNAL	25.5	C	26.2	C
IN-51	Nason Str/Alessandro Blvd	D	SIGNAL	31.1	C	28.3	C
IN-52	Kitching Str/Cactus Ave	C	SIGNAL	30.7	C	28.5	C
IN-53	Lasselle Str/Cactus Ave	C	SIGNAL	38.5	D	34.8	C
IN-54	Morrison Str/Cactus Ave	D	SIGNAL	6.1	A	8.6	A
IN-55	Nason Str/Cactus Ave	D	SIGNAL	36.1	D	47.6	D
IN-56	Frederick Str/Alessandro Blvd	D	SIGNAL	19.2	B	34.5	C
IN-57	Graham Str/Alessandro Blvd	D	SIGNAL	35.6	D	88.9	F
IN-58	Heacock Str/Alessandro Blvd	D	SIGNAL	29.6	C	29.5	C
IN-59	Indian Str/Alessandro Blvd	D	SIGNAL	21.7	C	37.1	D
IN-60	Perris Blvd/Alessandro Blvd	D	SIGNAL	32.8	C	41.4	D
IN-61	Frederick Str/Cactus Ave	D	SIGNAL	9.7	A	12.5	B
IN-62	Graham Str/Cactus Ave	D	SIGNAL	22.7	C	42.1	D
IN-63	Heacock Str/Cactus Ave	D	SIGNAL	31.6	C	27.2	C
IN-64	Indian Str/Cactus Ave	C	SIGNAL	32.6	C	36.3	D
IN-65	Perris Blvd/Cactus Ave	D	SIGNAL	39.2	D	32.5	C
IN-66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	37.5	D	81.2	F
IN-67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	6.6	A	11.5	B
IN-68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	21.9	C	32.8	C
IN-69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	15.1	B	16.4	B
IN-70	Day Str/Alessandro Blvd	D	SIGNAL	22.6	C	28.2	C
IN-71	Elsworth Str/Alessandro Blvd	D	SIGNAL	28.4	C	52.4	D
IN-72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	37.6	D	144.8	F
IN-73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	71.1	E	122.6	F
IN-74	Elsworth Str/Cactus Ave	D	SIGNAL	> 180.0	F	> 180.0	F
IN-75	Central Ave/Lochmoor Dr.	D	SIGNAL	16.2	B	77.5	E
IN-76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	28.6	C	26.8	C
IN-77	SR-60 EB Ramps/Central Ave	D	SIGNAL	18.1	B	12.4	B
IN-78	SR-60 WB Ramps/Central Ave	D	SIGNAL	6.7	A	7.0	A
IN-79	Alessandro Blvd/Trautwein Rd.	D	SIGNAL	32.2	C	16.1	B
IN-80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	28.0	C	73.7	E
IN-81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	27.0	C	41.5	D
IN-82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	11.3	B	14.8	B
IN-83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	40.2	D	52.4	D
IN-84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	11.2	B	12.2	B
IN-85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	45.1	E	20.7	C
IN-86	Central Ave/Chicago Ave	D	SIGNAL	46.8	D	79.0	E
IN-87	Central Ave/El Cerrito Dr	D	SIGNAL	17.6	B	20.0	B
IN-88	Central Ave/Canyon Crest Dr	D	SIGNAL	45.4	D	106.3	F
IN-89	Chicago Ave/Country Club Dr	D	SIGNAL	11.2	B	12.9	B

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ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
IN-90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	38.4	D	68.0	E
IN-91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	20.5	C	26.8	C
IN-92	Arlington Ave/Maude St	D	SIGNAL	14.1	B	10.7	B
IN-93	Horace St/Arlington Ave	D	SIGNAL	37.4	D	25.5	C
IN-94	Arlington Ave/Victoria Ave	D	SIGNAL	124.5	F	87.2	E
IN-95	Alessandro Blvd/Chicago Ave	D	SIGNAL	57.4	E	111.2	F
IN-96	Alessandro Blvd/Century Ave	D	SIGNAL	19.2	B	11.8	B
IN-97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	17.9	B	22.2	C
IN-98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	56.6	E	131.0	F
IN-99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	33.5	C	48.0	D
IN-100	Harley Knox Blvd/Evan Rd	D	SIGNAL	16.1	B	23.8	C
IN-101	Ramona Expy/Indian St	E	SIGNAL	110.4	F	> 180.0	F
IN-102	Ramona Expy/Perris Blvd	E	SIGNAL	49.2	D	58.5	E
IN-103	Ramona Expy/Evans Rd	E	SIGNAL	60.6	E	46.2	D
IN-104	Perris Blvd/Morgan St	D	SIGNAL	11.9	B	9.9	A
IN-105	Evans Rd/Morgan St	C	SIGNAL	28.1	C	21.8	C
IN-106	Perris Blvd/Rider St	C	SIGNAL	23.4	C	30.1	C
IN-107	Evans Rd/Rider St	C	SIGNAL	36.3	D	34.5	C
IN-108	Perris Blvd/Mid County Pkwy WB Ramps	D	SIGNAL	32.7	C	22.6	C
IN-109	Perris Blvd/Mid County Pkwy EB Ramps	D	SIGNAL	28.3	C	36.2	D
IN-110	Evans Rd/Mid County Pkwy WB Ramps	D	SIGNAL	25.7	C	21.3	C
IN-111	Evans Rd/Mid County Pkwy EB Ramps	D	SIGNAL	18.1	B	24.9	C
IN-112	Placentia Ave/Perris Blvd	D	SIGNAL	29.3	C	34.2	C
IN-113	Evans Rd/Placentia Ave	D	SIGNAL	7.3	A	7.4	A
IN-114	Evans Rd/Orange Ave	C	SIGNAL	25.5	C	25.3	C
IN-115	Evans Rd/Nuevo Rd	C	SIGNAL	31.8	C	31.2	C
IN-116	Evans Rd/Ellis Ave	D	SIGNAL	12.7	B	13.6	B
IN-117	Ellis Ave/I-215 SB Ramps	E	SIGNAL	26.5	C	28.3	C
IN-118	Ellis Ave/SR-215 NB Ramps	E	SIGNAL	22.2	C	34.3	C
IN-119	Evans Rd/San Jacinto Ave	D	SIGNAL	21.1	C	22.7	C
IN-120	Park Center Blvd/Ramona Expy WB Ramps	D	CSS	11.8	B	15.3	C
IN-121	Park Center Blvd/Ramona Expy EB Ramps	D	CSS	11.6	B	23.1	C
IN-122	Bridge St/Ramona Expy	N/A	N/A	Non-Existent		Non-Existent	
IN-123	Gilman Springs Rd/Bridge Str	C	CSS	> 180.0	F	> 180.0	F
IN-124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	> 180.0	F	> 180.0	F
IN-125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	> 180.0	F	> 180.0	F
IN-126	Ramona Expy/Sanderson Ave	D	SIGNAL	43.9	D	39.9	D
IN-127	Potrero Blvd/SR-60 WB Ramps	D	SIGNAL	21.3	C	15.3	B
IN-128	Potrero Blvd/SR-60 EB Ramps	D	SIGNAL	20.3	C	31.3	C
IN-129	W 6th St/California Ave	C	AWS	146.4	F	178.3	F

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ID	Study Intersection	LOS Standard	Traffic Control	AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS
IN-130	W 6th St/Beaumont Ave	C	SIGNAL	35.5	D	94.4	F
IN-131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	42.2	D	100.9	F
IN-132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	26.4	D	22.2	C
IN-133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	127.6	F	127.7	F
IN-134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	140.5	F	> 180.0	F
IN-135	W Crescent Ave/Alessandro Rd	C	CSS	17.6	C	14.7	B
IN-136	W Sunset Dr/Alessandro Rd	C	AWS	10.2	B	10.4	B

Notes: "NB" and "SB" denote northbound and southbound, respectively
 "EB" and "WB" denote eastbound and westbound, respectively "CSS" means cross-street is stop-controlled
 Indicates LOS exceeds the target level "AWS" means all-way stop
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

- Central Avenue/Chicago Avenue (p.m.);
- Central Avenue/Canyon Crest Drive (p.m.);
- Arlington Avenue/Riverside Avenue/SR-91 Southbound Ramps (p.m.);
- Arlington Avenue/Victoria Avenue (a.m. and p.m.);
- Alessandro Boulevard/Chicago Avenue (a.m. and p.m.);
- Alessandro Boulevard/Canyon Crest Drive (a.m. and p.m.);
- Ramona Expressway/Indian Street (a.m. and p.m.);
- Evans Road/Rider Street (a.m.);
- Gilman Springs Road/Bridge Street (a.m. and p.m.);
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road (a.m. and p.m.);
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road (a.m. and p.m.);
- W. 6th Street/California Avenue (a.m. and p.m.);
- W 6th Street/Beaumont Avenue (a.m. and p.m.);
- Reche Canyon Road/Reche Vista Drive (a.m. and p.m.);
- San Timoteo Canyon Road/Live Oak Canyon Road (a.m. and p.m.); and
- Redlands Boulevard/San Timoteo Canyon Road (a.m. and p.m.).

Year 2035 Cumulative without project roadway levels of service are based on daily V/C ratios for the study area roadway segments. Table 4.15.V summarizes the results of this analysis. In this scenario, Gilman Springs Road and Redlands Boulevard are assumed to have been widened in accordance with General Plan policy to six and four lanes, respectively. As shown in Table 4.15.V, all study area roadway segments are projected to operate at acceptable daily V/C ratios under Year 2035 Cumulative without project conditions.

A freeway segment level of service analysis was conducted to determine freeway performance under Year 2035 Cumulative without project conditions. Table 4.15.W summarizes the levels of service at study area freeway mainline segments under Year 2035 Cumulative without project conditions and

shows the following 56 study segments are forecast to operate at an unsatisfactory level of service during either the a.m. or p.m. peak hour:

- Northbound or Eastbound:
 - SR-60 Reservoir Street to Ramona Avenue (a.m. and p.m.);
 - SR-60 Ramona Avenue to Central Avenue (a.m. and p.m.);
 - SR-60 Central Avenue to Mountain Avenue (a.m. and p.m.);
 - SR-60 Mountain Avenue to Euclid Avenue (a.m.);
 - SR-60 Euclid Avenue to Grove Avenue (a.m. and p.m.);
 - SR-60 Grove Avenue to Vineyard Avenue (a.m. and p.m.);
 - SR-60 Vineyard Avenue to Archibald Avenue (a.m. and p.m.);
 - SR-60 Archibald Avenue to Haven Avenue (a.m.);
 - SR-60 Valley Way to Rubidoux Boulevard (a.m.);
 - SR-60 Rubidoux Boulevard to Market Street (a.m.);
 - SR-60 Market Street to Main Street (a.m. and p.m.);
 - SR-60 Martin Luther King Boulevard to Central Avenue (a.m. and p.m.);
 - SR-60 Pigeon Pass Road/Frederick Street to Heacock Street (p.m.);
 - SR-60 Heacock Street to Perris Boulevard (p.m.);
 - SR-60 Redlands Boulevard to Theodore Street (p.m.);
 - SR-60 Gilman Springs Road to Jack Rabbit Trail (p.m.);
 - SR-91 I-15 to McKinley Street (p.m.);
 - SR-91 Pierce Street to Magnolia Avenue (a.m. and p.m.);
 - SR-91 La Sierra Avenue to Tyler Street (a.m. and p.m.);
 - SR-91 Adam Street to Madison Street (a.m.);
 - SR-91 Central Avenue to 14th Street (a.m.);
 - I-10 SR-60 to Beaumont Avenue (p.m.);
 - I-10 Beaumont Avenue to Pennsylvania Avenue (p.m.);
 - I-10 Pennsylvania Avenue to Highland Springs (p.m.);
 - I-10 Highland Springs Avenue to Sunset Avenue (p.m.);
 - I-10 S. Hargrave Street to Field Road (p.m.);
 - I-10 Morongo Trail to Main Street (p.m.);
 - I-215 Scott Road to Newport Road (p.m.);
 - I-215 SR-74 to Redlands Boulevard (p.m.); and
 - I-215 Ellis Avenue to Redlands Boulevard (p.m.);

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Table 4.15.V: Year 2035 Cumulative Without Project Roadway Levels of Service

Roadway	From	To	LOS Standard*	Roadway Section**	Daily Volume	LOS
Theodore Street (A)	SR-60 WB Ramps	Ironwood Avenue	D	2U	9,774	C
Theodore Street (A)	SR-60 EB Ramps	Fir (Eucalyptus) Ave.	D	2U	8,726	B
Fir (Eucalyptus) Ave.	Redlands Blvd	Theodore Street (A)	D	2U	6,847	A
Eucalyptus Ave (B)	Theodore Street (A)	Gilman Springs Rd	N/A	Future Road		
Theodore Street (A)	Fir (Eucalyptus) Ave.	Street E	D	2U	3,295	A
Street E	Theodore Street (A)	Cactus Ave Extension	N/A	Future Road		
Street F	Theodore Street (A)	Alessandro Blvd (Street C)	N/A	Future Road		
Theodore Street (A)	Fir (Eucalyptus) Ave.	Alessandro Blvd (Street C)	D	2U	3,437	A
Alessandro Blvd (Street E)	Merwin Street	Theodore Street (A)	D	2U	10,854	D
Cactus Ave Extension	Alessandro Blvd (Street E)	Cactus Ave.	N/A	Future Road		
Alessandro Blvd (Street C)	Theodore Street (A)	Street F	D	2U	7,437	A
Alessandro Blvd (Street C)	Street F	Gilman Springs Rd	D	2U	7,437	A
Alessandro Blvd	Moreno Beach Drive	Redlands Blvd	D	4U	6,373	A
Gilman Springs Rd	Alessandro Blvd (Street C)	Bridge Street	D	6D	49,434	D
Gilman Springs Rd	SR-60	Alessandro Blvd (Street C)	D	6D	41,537	C
Redlands Blvd	SR-60 EB Ramps	Fir (Eucalyptus) Ave.	D	4U	13,411	A
Redlands Blvd	Fir (Eucalyptus) Ave.	Alessandro Blvd	C	4U	7,665	A
Alessandro Blvd	Redlands Blvd	Merwin Street	C	4U	11,038	A
Redlands Blvd	Alessandro Blvd	Cactus Ave.	C	4U	11,511	A
Cactus Ave.	Redlands Blvd	Cactus Ave Extension	C	4U	1,144	A

* LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways

** Section is the number of lanes, with "U" for "undivided" and "D" for "Divided" roadways

Indicates volume-to-capacity (V/C) ratio greater than 1.00

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.W: Year 2035 Cumulative Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-2	SR-60	S Reservoir St to Ramona Ave	8,560	41.2	E	8,750	43.6	E	8,770	43.3	E	7,840	34.6	D
F-3	SR-60	Ramona Ave to Central Ave	8,190	37.8	E	10,230	66.5	F	8,080	37.2	E	7,720	33.7	D
F-4	SR-60	Central Ave to Mountain Ave	8,900	44.8	E	10,210	66.0	F	6,340	25.4	C	7,580	32.7	D
F-5	SR-60	Mountain Ave to Euclid Ave	8,780	43.4	E	7,590	33.3	D	6,230	25.2	C	8,250	37.9	E
F-6	SR-60	Euclid Ave to Grove Ave	9,920	59.3	F	9,680	56.0	F	6,470	26.1	D	7,950	35.5	E
F-7	SR-60	Grove Ave to Vineyard Ave	9,210	48.5	F	10,050	62.7	F	6,280	25.0	C	8,150	37.1	E
F-8	SR-60	Vineyard Ave to Archibald Ave	9,080	46.3	F	10,210	66.0	F	7,660	33.3	D	7,640	33.1	D
F-9	SR-60	Archibald Ave to Haven Ave	8,430	39.5	E	7,330	31.5	D	See Weaving Analysis			See Weaving Analysis		
F-10	SR-60	Haven Ave to Miliken Ave	8,430	27.5	D	8,110	26.4	D	6,510	20.3	C	7,970	25.6	C
F-11	SR-60	Miliken Ave to I-15	5,160	19.8	C	4,530	17.4	B	5,460	21.0	C	7,180	29.8	D
F-12	SR-60	I-15 to Etiwanda Ave	4,140	15.9	B	2,740	10.6	A	4,840	14.9	B	6,360	19.4	C
F-13	SR-60	Etiwanda Ave to Mission Blvd/ Country Village Rd	4,950	19.1	C	4,170	16.1	B	4,220	16.1	B	5,620	21.6	C
F-14	SR-60	Mission Blvd/ Country Village Rd to Pedley Rd	4,380	16.8	B	3,150	12.2	B	4,140	15.9	B	5,660	21.8	C
F-15	SR-60	Pedley Rd to Pyrite St	4,620	17.8	B	3,610	13.9	B	3,260	12.5	B	4,820	18.3	C
F-16	SR-60	Pyrite St to Valley Way	5,060	19.5	C	3,880	15.0	B	2,470	9.5	A	3,930	14.9	B

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ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-17	SR-60	Valley Way to Rubidoux Blvd	6,160	38.0	E	3,850	19.9	C	4,560	24.1	C	6,360	39.6	E
F-18	SR-60	Rubidoux Blvd to Market St	6,490	42.1	E	4,210	22.2	C	3,410	17.5	B	5,120	27.7	D
F-19	SR-60	Market St to Main St	6,020	36.4	E	6,620	44.9	E	5,530	31.5	D	6,280	38.7	E
F-20	SR-60	Main to SR-91	See Weaving Analysis						5,320	29.7	D	6,310	39.0	E
F-24	SR-60	Martin Luther King Blvd to Central Ave	9,500	59.8	F	9,860	70.8	F	8,330	30.8	D	8,980	33.0	D
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	6,090	24.2	C	5,790	22.9	C	7,500	33.2	D	8,970	46.6	F
F-27	SR-60	I-215 to Day St.	See Weaving Analysis						7,050	50.4	F	3,590	18.6	C
F-29	SR-60	Pigeon Pass Rd/Frederick St to Heacock St	3,330	27.3	D	4,120	38.2	E	3,650	31.3	D	3,910	35.0	E
F-30	SR-60	Heacock St to Perris Blvd	3,020	24.1	C	4,200	39.6	E	3,560	30.1	D	3,410	28.3	D
F-31	SR-60	Perris Blvd to Nason St	2,670	20.9	C	3,520	29.4	D	3,330	27.3	D	2,780	21.9	C
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	2,480	19.2	C	3,130	25.0	C	3,150	25.2	C	2,680	20.9	C
F-34	SR-60	Redlands Blvd to Theodore St	3,200	25.9	C	4,500	45.4	F	4,010	36.3	E	3,530	29.7	D
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	2,420	20.1	C	4,430	53.0	F	3,350	30.5	D	2,920	25.2	C
F-37	SR-60	Jack Rabbit Trail to I-10/Potrero Blvd	2,500	19.5	C	4,750	51.8	F	3,690	31.6	D	3,010	24.0	C
F-38	SR-60	Potrero Blvd to I-10	2,300	17.8	B	3,620	30.6	D	2,360	18.2	C	1,930	15.0	B

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Table 4.15.W: Year 2035 Cumulative Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-39	SR-91	I-15 to McKinley St	8,140	26.3	D	11,870	52.4	F	8,590	28.6	D	8,630	28.6	D
F-40	SR-91	McKinley St to Pierce St	6,990	29.1	D	6,910	29.0	D	6,550	26.9	D	7,440	32.0	D
F-41	SR-91	Pierce St to Magnolia Ave	6,430	41.3	E	6,360	41.2	E	6,260	39.9	E	9,000	144.5	F
F-42	SR-91	Magnolia Ave to La Sierra Ave	See Weaving Analysis						6,130	38.3	E	8,600	107.0	F
F-43	SR-91	La Sierra Ave to Tyler St	6,170	38.1	E	6,250	39.8	E	5,460	31.4	D	6,390	40.8	E
F-44	SR-91	Tyler St to Van Buren Blvd	7,250	30.7	D	6,950	29.2	D	6,880	28.8	D	7,970	35.9	E
F-45	SR-91	Van Buren Blvd to Adam St	7,270	30.8	D	6,290	25.5	C	6,590	27.1	D	7,720	34.0	D
F-46	SR-91	Adam St to Madison St	7,980	36.6	E	6,030	24.3	C	6,270	25.4	C	6,970	29.0	D
F-47	SR-91	Madison St to Indiana Ave	7,000	29.6	D	5,390	21.4	C	5,540	32.1	D	6,290	39.5	E
F-49	SR-91	Central Ave to 14th St	6,400	40.9	E	5,730	33.4	D	5,290	20.8	C	5,460	21.2	C
F-51	SR-91	University Ave to Spruce St (off-ramp)	8,160	26.4	D	7,420	23.4	C	See Weaving Analysis					
F-66	I-215	Scott Rd to Garbani Rd	3,350	17.2	B	6,010	36.0	E	5,470	30.8	D	4,160	21.5	C
F-84	I-215	Garbani Rd to Newport Rd	3,150	16.1	B	5,680	32.9	D	4,950	26.6	D	4,040	20.9	C
F-68	I-215	Newport Rd to MacCall Blvd	2,910	15.0	B	4,610	24.4	C	5,020	27.2	D	5,240	28.9	D
F-69	I-215	MacCall Blvd to Ethanac Rd	3,530	18.1	C	5,570	31.9	D	5,400	30.4	D	4,800	25.6	C
F-70	I-215	Ethanac Rd to SR-74	5,240	29.1	D	5,650	32.6	D	5,390	30.3	D	6,220	38.3	E

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Table 4.15.W: Year 2035 Cumulative Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-71	I-215	SR-74/Ellis Ave	5,200	28.7	D	6,760	46.1	F	7,170	53.3	F	5,980	35.6	E
F-85	I-215	Ellis Ave to Redlands Ave	4,820	25.9	C	6,200	38.4	E	6,560	43.1	E	5,490	31.2	D
F-74	I-215	Columbia Ave to Center St	4,110	21.6	C	3,350	17.5	B	5,000	27.4	D	3,680	19.1	C
F-75	I-215	Center St to La Cadena Dr	4,940	26.9	D	4,270	22.7	C	5,970	35.8	E	4,690	25.1	C
F-76	I-215	La Cadena Dr to Barton Rd	4,880	26.5	D	4,310	22.8	C	5,060	27.8	D	3,780	19.7	C
F-77	I-215	Barton Rd to Mt Vernon Ave	5,320	29.9	D	4,700	25.4	C	5,540	31.6	D	4,210	22.2	C
F-78	I-215	Mt Vernon Ave to I-10	5,110	19.8	C	5,720	22.5	C	6,480	26.2	D	5,210	20.3	C
F-80	I-215	Auto Plaza Dr to Mill St	4,680	18.0	B	5,980	23.6	C	5,600	21.7	C	4,540	17.4	B
F-83	I-215	Baseline Rd to Highland Ave	3,260	16.8	B	4,890	26.4	D	6,910	48.0	F	5,450	30.8	D
F-52	I-10	SR-60 to Beaumont Ave	5,030	19.7	C	8,170	38.3	E	7,820	35.3	E	6,060	24.5	C
F-53	I-10	Beaumont Ave to Pennsylvania Ave	5,100	20.1	C	8,030	37.1	E	7,660	34.1	D	5,840	23.5	C
F-54	I-10	Pennsylvania Ave to Highland Springs	5,240	20.7	C	8,170	38.3	E	8,180	38.4	E	5,920	23.9	C
F-55	I-10	Highland Springs Ave to Sunset Ave	5,350	21.2	C	8,240	38.9	E	7,990	36.7	E	5,590	22.3	C
F-56	I-10	Sunset Ave to 22nd St	4,970	19.6	C	7,670	34.5	D	7,620	33.8	D	5,420	21.5	C
F-57	I-10	22nd St to 8th St	4,880	19.3	C	7,480	33.0	D	7,680	34.5	D	5,130	20.3	C
F-58	I-10	8th St to S Hargrave St	5,000	19.7	C	7,770	34.9	D	7,790	35.4	E	5,370	21.4	C
F-59	I-10	S Hargrave St to Fields Rd	4,770	18.8	C	7,970	36.9	E	7,610	34.0	D	5,000	19.8	C

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Table 4.15.W: Year 2035 Cumulative Without Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Northbound / Eastbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-60	I-10	Fields Rd to Morongo Tr	3,990	15.8	B	7,490	33.1	D	7,150	30.7	D	4,620	18.3	C
F-61	I-10	Morongo Tr to Main St	4,320	17.1	B	7,800	35.2	E	7,040	30.0	D	5,040	20.0	C
F-62	I-10	Main St to Haugen-Lehmann Way	4,080	16.1	B	7,530	33.1	D	7,070	30.2	D	4,410	17.4	B
F-64	I-10	SR-111 to Tipton Rd	3,660	14.5	B	7,320	31.7	D	6,420	26.2	D	4,860	19.2	C
F-65	I-10	Tipton Rd to SR-62	3,700	14.6	B	7,330	31.7	D	6,430	26.2	D	4,870	19.2	C

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

- Southbound or Westbound:
 - SR-60 Reservoir Street to Ramona Avenue (a.m.);
 - SR-60 Ramona Avenue to Central Avenue (a.m.);
 - SR-60 Mountain Avenue to Euclid Avenue (p.m.);
 - SR-60 Euclid Avenue to Grove Avenue (p.m.);
 - SR-60 Grove Avenue to Vineyard Avenue (p.m.);
 - SR-60 Valley Way to Rubidoux Boulevard (p.m.);
 - SR-60 Market Street to Main Street (p.m.);
 - SR-60 Main Street to SR-91 (p.m.);
 - SR-60 Fair Isle Drive/Box Springs Road to I-215 (p.m.);
 - SR-60 I-215 to Day Street (a.m.);
 - SR-60 Pigeon Pass Road to Heacock Street (p.m.)
 - SR-60 Redlands Boulevard to Theodore Street (a.m.);
 - SR-91 Pierce Street to Magnolia Avenue (a.m. and p.m.);
 - SR-91 Magnolia Avenue to La Sierra Avenue (a.m. and p.m.);
 - SR-91 La Sierra Avenue to Tyler Street (p.m.);
 - SR-91 Tyler Street to Van Buren Boulevard (p.m.);
 - SR-91 Madison Street to Indiana Avenue (p.m.);
 - I-10 SR-60 to Beaumont Avenue (a.m.);
 - I-10 Pennsylvania Avenue to Highland Springs Avenue (a.m.);
 - I-10 Highland Springs Avenue to Sunset Avenue (a.m.);
 - I-10 8th Street to S. Hargrave Street (a.m.);
 - I-215 Ethanac Road to SR-74 (p.m.);
 - I-215 SR-74 to Ellis Avenue (a.m. and p.m.);
 - I-215 Ellis Avenue to Redlands Boulevard (a.m.);
 - I-215 Center Street to Iowa Avenue/La Cadena Drive (a.m.); and
 - I-215 Baseline Road to Highland Avenue (a.m.).

A freeway weaving analysis was conducted on freeway segments where an on-ramp is closely followed by an off-ramp, and the two are joined by an auxiliary lane. Table 4.15.X summarizes the levels of service at weaving segments under Year 2035 Cumulative without project conditions and shows the following seven northbound or eastbound and six southbound or westbound freeway weaving segments are forecast to operate at unsatisfactory levels of service in either the a.m. peak or p.m. peak hour:

- Northbound or Eastbound:
 - SR-60 SR-71/Garey Avenue to Reservoir Street (a.m. and p.m.);
 - SR-60 Main Street to SR-91 (p.m.);

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- SR-60 SR-91 to W. Blaine Street/3rd Street (p.m.);
- SR-60 W. Blaine Street/3rd Street to University Avenue (a.m. and p.m.);
- SR-60 Central Avenue to Fair Isle Drive/Box Springs Road (a.m. and p.m.);
- SR-60 Theodore Street to Gilman Springs Road (p.m.); and
- SR-91 Arlington Avenue to Central Avenue (a.m.).
- Southbound or Westbound:
 - SR-60 Haven Avenue to Archibald Avenue (p.m.);
 - SR-60 SR-91 to W. Blaine Street/3rd Street (p.m.);
 - SR-60 W. Blaine Street/3rd Street to University Avenue (p.m.);
 - SR-60 University Avenue to Martin Luther King Boulevard (a.m. and p.m.);
 - SR-60 Central Avenue to Fair Isle Drive/Box Springs Road (a.m. and p.m.); and
 - I-10 Haugen-Lehmann Way to SR-111 (p.m.).

Freeway ramp merge and diverge operations have been evaluated for Year 2035 Cumulative without project conditions. Table 4.15.Y summarizes the levels of service at under Year 2035 Cumulative without project conditions and shows the following 9 freeway ramp junctions are forecast to operate at unsatisfactory levels of service in either the a.m. peak or p.m. peak hour:

- SR-60 Eastbound On-Ramp from Central Avenue (a.m. and p.m.);
- SR-60 Eastbound Off-Ramp to Theodore Street (p.m.);
- SR-60 Eastbound Loop On-Ramp from Theodore Street (p.m.);
- SR-60 Eastbound Off-Ramp to Gilman Springs Road (p.m.);
- SR-60 Eastbound On-Ramp from Gilman Springs Road (p.m.);
- SR-60 Westbound On-Ramp from Gilman Springs Road (a.m.);
- SR-60 Westbound Off-Ramp to Theodore Street (a.m.);
- SR-60 Westbound On-Ramp from Theodore Street (a.m.); and
- SR-60 Westbound Loop On-Ramp from Redlands Boulevard (a.m.).

Table 4.15.X: Year 2035 Cumulative Without Project Weaving Segment Levels of Service

ID	Freeway	Weaving Segment	Northbound / Eastbound			Southbound / Westbound										
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour							
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS					
W-1	SR-60	SR-71/Garey Ave to Reservoir St	8,630	39.7	E	9,700	46.8	E	6,130	22.0	C	7,510	27.6	C		
W-9	SR-60	Haven Ave to Archibald Ave	See Basic Analysis			See Basic Analysis			6,910	28.7	D	8,180			36.4	E
W-20	SR-60	Main St to SR-91	7,060	34.1	D	7,110	35.1	E	See Basic Analysis			See Basic Analysis				
W-21	SR-60	SR-91 to Blaine St/3rd St	7,280	32.4	D	10,640	>Capacity	F	8,490	33.7	D	9,970	40.9	E		
W-22	SR-60	Blaine St/3rd St to University Ave	7,120	28.9	D	8,460	38.7	E	6,320	24.3	C	8,890	35.8	E		
W-23	SR-60	University Ave to Martin Luther King	7,960	30.0	D	7,040	26.4	C	6,750	28.2	D	8,830	36.9	E		
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs	7,890	37.0	E	8,640	40.5	E	8,340	38.1	E	9,200	39.2	E		
W-27	SR-60	I-215 to Day St	3,980	16.3	B	6,210	27.7	C	See Basic Analysis			See Basic Analysis				
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	3,760	16.2	B	5,660	26.5	C	4,790	33.5	D	4,790	32.4	D		
W-32	SR-60	Moreno Beach Dr to Nason St	2,640	16.5	B	3,480	22.6	C	3,310	20.5	C	2,680	16.2	B		
W-35	SR-60	Theodore St to Gilman Springs Rd	3,070	17.5	B	5,710	37.9	E	4,560	32.0	D	3,680	24.2	C		
W-42	SR-91	Magnolia Ave to La Sierra Ave	6,970	33.7	D	6,930	34.2	D	See Basic Analysis			See Basic Analysis				
W-48	SR-91	Arlington Ave to Central Ave	7,620	41.0	E	4,370	21.3	C	5,160	24.9	C	5,760	27.4	C		
W-50	SR-91	14th St to University Ave	5,310	26.4	C	5,060	26.1	C	6,070	23.7	C	8,010	33.0	D		
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	See Basic Analysis			See Basic Analysis			6,500	20.6	C	10,130	32.5	D		
W-73	I-215	SR-60 to Columbia Ave	5,330	28.4	D	4,610	24.6	C	6,660	33.8	D	5,570	28.2	D		
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,590	16.9	B	5,640	20.9	C	6,200	22.5	C	4,950	18.8	B		
W-81	I-215	Mill St to 2nd St	5,190	18.3	B	6,460	23.5	C	6,360	23.4	C	4,980	18.3	B		
W-82	I-215	5th St to Baseline Rd	3,900	13.5	B	4,980	17.7	B	5,610	20.3	C	4,060	14.6	B		
W-63	I-10	Haugen-Lehmann Way to SR-111	4,170	14.4	B	8,420	33.1	D	7,270	29.0	D	5,500	>Capacity	F		

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15. Y: Year 2035 Cumulative Without Project Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp Segment	Ramp No. of Lanes	AM Peak Hour			PM Peak Hour			LOS		
				Mainline Volume	Ramp Volume	Density (pc/mi/in)	LOS	Mainline Volume	Ramp Volume		Density (pc/mi/in)	
R-1	SR-60 EB	On-Ramp from Martin Luther King Blvd	1	7,410	580	30.6	D	6,430	1,400	33.8	D	
R-2	SR-60 EB	On-Ramp from Central Ave	1	7,890	1,220	32.2	F	8,630	970	32.9	F	
R-3	SR-60 EB	Off-Ramp to Redlands Blvd	1	2,480	220	13.8	B	3,130	440	19.7	B	
R-4	SR-60 EB	Loop On-Ramp from Redlands Blvd	1	2,260	90	22.1	C	2,890	60	25.4	C	
R-5	SR-60 EB	Direct On-Ramp from Redlands Blvd	1	2,350	110	19.9	B	2,750	480	26.0	C	
R-6	SR-60 EB	Off-Ramp to Theodore St	1	3,200	270	25.0	C	4,500	150	36.7	F	
R-7	SR-60 EB	Loop On-Ramp from Theodore St	1	2,930	150	22.0	C	4,350	1,350	42.9	F	
R-8	SR-60 EB	Direct On-Ramp from Theodore St	0	Does not exist in this Scenario							Does not exist in this Scenario	
R-9	SR-60 EB	Off-Ramp to Gilman Springs Rd	2	3,070	840	19.4	B	5,710	1,570	35.8	E	
R-10	SR-60 EB	On-Ramp from Gilman Springs Rd	1	2,230	260	16.9	B	4,140	470	34.3	F	
R-11	SR-60 WB	Off-Ramp to Gilman Springs Rd	2	3,350	240	20.9	C	2,920	560	18.2	B	
R-12	SR-60 WB	On-Ramp from Gilman Springs Rd	1	3,110	1,330	32.2	D	2,360	1,140	24.6	C	
R-13	SR-60 WB	Off-Ramp to Theodore St	1	4,560	640	32.7	F	3,680	380	24.8	C	
R-14	SR-60 WB	On-Ramp from Theodore St	1	3,920	90	35.5	E	3,300	230	31.5	D	
R-15	SR-60 WB	Off-Ramp to Redlands Blvd	1	4,010	310	32.4	D	3,530	370	28.1	D	
R-16	SR-60 WB	Loop On-Ramp from Redlands Blvd	1	3,700	200	36.5	E	3,160	110	31.4	D	
R-17	SR-60 WB	Direct On-Ramp from Redlands Blvd	1	3,900	350	34.7	D	3,270	280	29.0	D	
R-18	SR-60 WB	Off-Ramp to Central Ave	2	8,340	480	32.0	D	9,200	540	35.0	D	
R-19	SR-60 WB	Off-Ramp to Martin Luther King Blvd	1	8,330	710	32.5	D	8,980	660	34.1	D	

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

4.15.4 Thresholds of Significance

Based on Appendix G of the *CEQA Guidelines*, the proposed project would create potentially significant traffic impacts if it would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit.
- Cause a decrease from satisfactory LOS (based on local agency adopted standards) to an unsatisfactory LOS on a study area intersection, roadway segment, freeway mainline lane, freeway weaving segment or freeway ramp. A significant cumulative traffic impact would occur if the project contributes traffic toward those facilities operating at unsatisfactory LOS in the without project condition. The adopted LOS standards are as follows:
 - Roadway segments and intersections: LOS C; and LOS D as outlined in previously referenced Table 4.15.E.
 - Freeway mainline: LOS D.
 - Freeway Ramp Merge/Diverge: LOS D.
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, which results in substantial safety risks.
- Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

The Moreno Valley General Plan Circulation Element, adopted July 2006, defines a preferred performance standard of LOS C (where feasible) for City roads (including intersections). However, the circulation element also allows peak hour levels of service in the LOS D range at certain locations. These locations include areas of high employment concentration or north/south roads in the vicinity of the SR-60. Therefore, if a roadway segment or intersection is projected to operate at an acceptable level of service (i.e., LOS C/D or better) without the project, and the project is expected to cause the intersection to operate at an unacceptable level of service, the project impact is considered significant.

The study area includes intersections and roadways in six cities besides Moreno Valley. Table 4.15.Z shows the various level of service standards for intersections within each jurisdiction. A project's impact on an intersection is considered significant if it causes the LOS to exceed the target level set by the jurisdiction or, if the LOS in the no project condition already exceeds the LOS level, if the project causes an increase in traffic delay beyond the no project condition.

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Table 4.15.Z: Intersection LOS Standards by Jurisdiction

Jurisdiction	Type of Facility	# of Study Intersections	LOS Standard
Moreno Valley	Intersections adjacent to freeways or employment centers	57	D
	All other intersections	14	C
Beaumont	Most intersections	2	C
	Intersections with major highways	2	D
Perris	Intersections with SR-74, Ramona Expr, or I-215	5	E
	Expressway/arterial intersections	10	D
	All other intersections	6	C
Redlands	Intersections currently operating at "D" or worse	1	Existing LOS
	All other intersections	2	C
Riverside (County)	Most intersections*	7	C
	Intersections with Ramona Expressway	2	D
Riverside (City)	Intersections of collectors or higher roads	27	D
San Jacinto	Arterial intersections	1	D
Caltrans	State highway facilities currently operating at LOS "E" or "F"		Existing Density
	State highway facilities		D

* Intersections between arterials, highways, expressways, and freeway ramps within community development areas are allowed LOS "D" as an exception.

Source: Table 12, Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

All freeway mainline segments and freeway ramps are under the jurisdiction of Caltrans. LOS D has been established by Caltrans as the operating standard for freeway mainline segments and freeway ramps. Therefore, if a freeway segment is projected to operate at an acceptable level of service (i.e., LOS D or better) without the project, and the project is expected to cause the facility to operate at an unacceptable level of service (i.e., LOS E or F), the impact is considered significant. Previously referenced Table 4.15.E shows level of service criteria for freeway segments and ramps.

4.15.5 Less than Significant Impacts

Air traffic patterns, design hazard features, emergency access, and alternative transportation policies, plans, or programs are considered to have either no impact or less than significant impacts.

4.15.5.1 Air Traffic Patterns

Threshold	Would the proposed project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
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Airport facilities within the vicinity of the project site include the March Air Field, which is part of the March Air Reserve Base (MARB). The MARB encompasses approximately 6,500 acres of the Air Force Reserve's 452nd Air Mobility Wing, which provides host base support for numerous tenant active military units. It is also the home of 4th Air Force and multiple units of the California Air National

Guard. When March Air Force Base (March AFB) was converted from an active duty base to a Reserve Base in 1996, the decision resulted in approximately 4,400 acres of property and facilities being declared surplus and available for disposal actions, as well as joint use of the airfield. With the realignment of March AFB, the MARB Redevelopment Project Area was established. The MARB Redevelopment Project Area includes the entire 6,500-acre former active duty base area, and approximately 450 acres adjacent to the base in the industrial area of the City of Moreno Valley.

To implement the MARB Redevelopment Project Area and to facilitate the transition of a portion of the MARB from military to civilian uses, the March Joint Powers Authority, (March JPA) consisting of the County of Riverside and the Cities of Moreno Valley, Perris, and Riverside, was formed. The March JPA along with the U.S. Air Force pursued the establishment of March Air Field as a joint use airport.

The Air Force defines a "joint use airport" as one where the facilities which are owned and operated by the Air Force are made available for use by civil aviation. A joint use agreement between these parties was executed May 7, 1997, along with land leases for over 300 acres as the civilian airport name MIP. Under the agreement, the civilian (March JPA) and the military (AFRC) entities share essential aviation facilities such as the control towers and runways, as well as maintenance of facilities, under this joint use arrangement. Under the provisions of the Joint Use Agreement, the MIP is the civilian facility that is managed and operated by the MIP Airport Authority (MIPAA). The MIP includes air cargo operations such as the March Global Port, a 350-acre commercial air cargo and distribution center.

The Department of the Defense (Air Force) completed an Air Installation Compatible Use Zone (AICUZ) study for MARB in 1998. The AICUZ study was designed and is intended to aid in the development of compatible land uses in non-government areas surrounding military airfields to protect public safety and health. The study established three zones based on potential crash patterns: a Clear Zone and two Accident Potential Zones (APZs). The Clear Zone reaches from along the extended runway centerline to a distance of 3,000 feet, APZ 1 extends from 3,000 feet to 8,000 feet, and APZ II extends from 8,000 feet to 15,000 feet. According to the AICUZ, outside of the Clear Zone and APZs "the risk of aircraft accidents is not significant enough to warrant special consideration in land use planning." The proposed project site is not located within a Clear Zone, APZ 1, or APZ 2 for MARB as designated by the Air Force 2005 AICUZ Study. In addition to the AICUZ, Airport Influence Area boundaries around MARB have been adopted by County of Riverside Airport Land Use Commission (ALUC) in its Airport Land Use Plan (ALUP). The proposed project site is located within Influence Area III.

The project site is approximately 1.5 miles east of the March Air Field and is entirely within Airport Influence Area III of the MIP. As part of the standard process for development within Airport Influence Areas for MARB, proposed projects are required to be reviewed by the ALUC for consistency with the ALUP. As a standard condition imposed during ALUC reviews, development located within the boundaries of Influence Area III is required to provide navigation easements. Development that is allowed to occur within Airport Influence III of the MIP would not include any features that would alter air traffic patterns or the level of air traffic at the MIP; therefore, a less than significant air safety impact would occur and no mitigation is required.

4.15.5.2 Design Hazard Features

NOTE: The following changes have been made in response to: Comment E-3-13 in Letter E-3 from the Moreno Valley Unified School District; Comment F-11-36 in Letter F-11 from the Sierra Club, San Geronio Chapter; and Comment G-96-4 in Letter G-96 from Margie Breikreuz.

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Threshold	Would the proposed project substantially increase hazards due to a design feature or incompatible use?
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The design of roadways must provide adequate sight distance and traffic control measures. This provision is normally realized through roadway design to facilitate roadway traffic flows. Roadway improvements in and around the project site would be designed and constructed to satisfy all City and Caltrans requirements for street widths, corner radii, intersection control as well as incorporate design standards tailored specifically to project access requirements. Adherence to applicable City requirements would ensure the proposed project would not include any sharp curves or dangerous intersections.

During the project review process, City staff expressed a concern about the intersection of D Street and the eastern end of Cactus Avenue, east of Redlands Boulevard. Early designs showed it as a skewed “T” intersection, but the Specific Plan now shows it extending further west through the Open Space area, then turning north and connecting to Alessandro Boulevard. With this design change, no significant road design hazards are expected.

Temporary impacts associated with the construction of infrastructure improvements included as a part this project may temporarily restrict vehicular traffic or cause temporary hazards. The construction of infrastructure would coincide with roadway improvements, which would include road or lane closures as well as the presence of construction workers and equipment on public roads. Construction operations would be required to implement adequate measures to facilitate the passage of people and vehicles through/around any required road or lane closures. Site-specific activities, such as temporary construction activities, are finalized on a project-by-project basis by the City and are required to ensure adequate traffic flow. At the time of approval of any site-specific plans required for the construction of infrastructure as a part of typical conditions of approval, the project would be required to implement measures that would maintain traffic flow and access. In the absence of a roadway design hazard, no impact would occur; therefore, no mitigation is required.

An analysis of safety impacts resulting from potential conflicts between project traffic and local schools was performed for this EIR. As identified in the project TIA (Appendix L-1 of this EIR), the project would not produce a significant safety risk and appropriate safety features are already present on roads near local schools. Other than Perris Boulevard, which would experience a small number of project trucks (22 and 25 medium and heavy duty trucks in the a.m. and p.m. peak hours, respectively), none of the other truck routes would result in project trucks traveling near local schools. The safety impact of project-related passenger cars along streets near local schools was also evaluated by reviewing existing pedestrian facilities and collecting pedestrian counts at the intersections along project truck routes. All pedestrian crossings at signalized intersections near schools are protected. Crosswalks near schools are striped in yellow (per the California Manual on Traffic Control Devices page 1,282). In most cases, sidewalks exist along roadways and lead to the striped, protected crosswalks at the intersections. Intersection and roadway features along project truck routes were reviewed and it was determined that adequate pedestrian amenities already exist in the form of protected crossings, crosswalks, curb ramps, and pedestrian signals. For these reasons, project passenger cars and trucks would not create unsafe conflicts with pedestrians.

In addition, the new proposed high school #5 was analyzed in a technical memorandum (Tech Memo on High School #5, July 2014, Revised DEIR Appendix L). It was determined that if both the proposed school and the proposed WLCSP were approved the mitigation measures proposed in the DEIR would reduce all potential impacts to less than significant levels.

4.15.5.3 Emergency Access

Threshold	Would the proposed project result in inadequate emergency access?
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Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate measures to facilitate the passage of people and vehicles through/around any required road closures. Site-specific activities such as temporary construction activities are finalized on a project-by-project basis by the City and are required to ensure adequate emergency access.

The roadway improvements that will take place as a part of this project will improve the traffic circulation in the area. For example, emergency vehicles that currently pass through the site using either Theodore Street or Alessandro Boulevard would continue to have those routes available to them, and these roads will be upgraded to arterial standards within the proposed project limits. Access to Alessandro Boulevard would be provided by a connection to Redlands Boulevard at Cactus Avenue instead, of a direct extension to Alessandro Boulevard. The change would not lengthen the distance between Gilman Springs Road and the Riverside Community Regional Medical Center on Cactus Avenue or the route to and from the Kaiser Moreno Valley Community Hospital on Iris Avenue. The extension of Eucalyptus Avenue through the project area would improve access between the project site and the nearest existing fire station (the Moreno Beach fire station). As a condition of approval, the proposed project will also be required to construct a fire station on site.

These improvements would enhance the ability of emergency vehicles to access the project as well as the surrounding properties. Access to the project site is designed to accommodate large trucks with trailers used for the distribution of goods to and from the warehouses. This would provide ample vehicular access for emergency vehicles. During the operational phase of the proposed project, on-site access would be required to comply with standards established by the City Public Works Department. The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to Fire Department standards. As required of all development in the City, the operation of the proposed project would conform to applicable Uniform Fire Code standards. The submittal of such plans would be considered a condition of approval, which would be part of the permitting process initiated by the applicant and approved by the City in accordance with City standards. As with any development, access to and through the project would be required to comply with the required street widths, as determined in the California Building Code (CBC), Master Plan of Streets, and the Uniform Fire Code. Therefore, implementation of the proposed project would not significantly impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; therefore, no mitigation is required.

4.15.5.4 Alternative Transportation Policies, Plans, or Programs

Threshold	Would the proposed project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?
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The proposed project would result in the development of employment opportunities and would therefore reduce vehicle miles traveled. Currently, approximately 70 percent of workers residing in the City of Moreno Valley commute to jobs outside the City. According to the U.S. Census Bureau, 21.7 percent of Moreno Valley workers commute more than 50 miles one-way to work, and another 20.8 percent drive 25 to 50 miles one way. Nearly four out of five Moreno Valley workers drive to work alone. The City is in need of employment opportunities to serve City and regional residents. A better jobs/housing balance results in shorter commute times, reduced vehicle miles traveled, and reduced traffic congestion. Locating jobs in areas such as the City is a public policy prerogative of the City, regional governmental entities such as SCAG, and the State of California as manifested by recent legislation such as SB 375. The project is consistent with these policies because it will provide

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approximately 20,000¹ new jobs; nearly doubling the number of jobs in Moreno Valley. As a result, the percentage of Moreno Valley residents that need to commute regionally would be reduced.

An updated Housing Element, adopted by the City in February 2011, identified the Moreno Highlands area as a potential location for future jobs-producing land uses. In April 2011, the City adopted its Economic Development Action Plan, which identified eastern Moreno Valley as a potential area for major job-producing land uses. The proposed World Logistics Center project is consistent with this planning objective, as it provides a comprehensive plan for jobs-producing land uses.

The WLC Specific Plan provides for Class II bicycle lanes on all project streets (see WLCSP Section 3.4.3 and WLCSP Figure 3-18). In addition, WLCSP Section 6.0, Sustainability, Item 2 indicates showers and changing rooms will be available which will facilitate people using bicycles to get to and from work.

As stated previously, the proposed project would generate jobs for approximately 20,000 employees working in the eastern portion of the City that would help reduce the number of workers driving long commutes to distant jobsites, primarily to the west and southwest. This finding is supported by the results of the RivTAM traffic model projections used in the TIA. The provision of additional employment options in proximity to existing residential development in the City will help reduce local vehicle miles traveled as the employment generated by the project slowly improves the City's job/housing ratio, and more local jobs are created for City residents. Therefore, the proposed project is consistent with City policies encouraging alternative transportation. Since the project will not create any significant impacts related to non-vehicular transportation, no mitigation is required.

Although there is currently no transit service in the project area, the proposed project would be designed to accommodate bus access on all project streets. Bus turnouts and shelters would be provided at all active bus stops. It is expected that transit service would be provided once the project reaches a transit-supportable level of operations. Candidate streets for future bus routes within the project limits are Eucalyptus Avenue, Street C, Street E, and Street F as shown in WLCSP Figure 3-14.

The WLCSP provides for connections to existing trails to the west along Redlands Boulevard, and to the southwest along Cactus Avenue. In addition, the plan provides for a new trail connection from the southwest corner of the site around the land designated as open space under the WLCSP, to connect to a future planned "trailhead" at the northwest corner of the state-owned property to the south. The WLCSP also includes a "loop" trail segment through the WLCSP along Street F to Eucalyptus Avenue and back to Redlands Boulevard (see EIR Figure 3-12, *Non-Vehicular Circulation*). In addition, the project will be conditioned to provide sidewalks and landscaping treatments to allow for pedestrian access throughout the site. With these planned improvements, the WLCSP will have less than significant impacts regarding non-vehicular circulation and no mitigation is required.

4.15.6 Significant Impacts

The following potential impacts were determined to be significant, either because the project would contribute to an intersection, roadway segment or freeway facility already exceeding the LOS threshold, or because the project would cause the intersection, roadway segment or freeway to exceed the LOS threshold. The project would be required to make required on-site and adjacent off-site improvements, contribute to local and regional circulation improvement through the payment of the DIFs and TUMFs, and would therefore contribute to improvements that may mitigate the direct

¹ Based on a ratio of 0.5 employees per 1000 square feet of logistics. This ratio is taken from: *DTA Public Works Database; confirmed by "Employment Density Study," SCAG (2001), and "Logistics Trends and Specific Industries," NAIOP Research Foundation (March 2010). San Bernardino Planning Department.*

project impact or cumulative impact of the project. Mitigation of direct project impacts can be in the form of improvements to the intersection, or payment of the fees if projects funded by the fee would mitigate the project impact to a less than significant level.

Planned Improvements. As part of the analysis of project traffic impacts, it is important to note that development within the WLCSP will make a number of roadway and intersection improvements that are within or adjacent to project property (i.e., on-site improvements). These improvements include:

- Gilman Springs/Alessandro Boulevard Intersection;
- Gilman Springs/Eucalyptus Avenue Intersection;
- SR-60 Westbound Ramp/Theodore Street Intersection;
- SR-60 Eastbound Ramp/Theodore Street Intersection;
- Redlands Boulevard/Eucalyptus Avenue Intersection;
- Theodore Street/Eucalyptus Avenue Intersection;
- Theodore Street (Street A)/Alessandro Boulevard (Streets C and E) Roundabout;
- Theodore Street (Street A)/Streets E and F Roundabout;
- Street F/Street C Roundabout;
- Eucalyptus Avenue from Redlands Boulevard to Theodore Street (south side); and
- Cactus Avenue Extension from the existing Redlands Boulevard/Cactus Avenue intersection to internal loop Street "E".
- Internal Streets A, B, C, E, and F shown on WLCSP Circulation Plan (EIR Figure 3-10).

4.15.6.1 Existing (2012) With Phase 1 Conditions Traffic and Level of Service

Threshold:	<p>Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit.</p> <p>A significant project-specific traffic impact would occur if the project would cause a decrease from satisfactory LOS (based on local agency adopted standards) to an unsatisfactory LOS on a study area intersection, roadway segment, freeway mainline lane, freeway weaving segment or freeway ramp. A significant cumulative traffic impact would occur if the project contributes traffic toward those facilities operating at unsatisfactory LOS in the pre-project condition. The adopted LOS standards are as follows:</p> <ul style="list-style-type: none">• Roadway segments: LOS C and LOS D as outlined in previously referenced Tables 4.15.B and 4.15.C.• Intersections: LOS C and LOS D as outlined in previously referenced Table 4.15.Z.• Freeway mainline: LOS D.• Freeway Ramp Merge/Diverge: LOS D.
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Impacts

Intersection Analysis. Existing baseline (year 2012) with Phase 1 intersection levels of service for the study area intersections are summarized in Tables 4.15.AA-1 and 4.15.AA-2, which shows there are 15 study intersections where Phase 1 of the project would have a significant impact. Twelve of these intersections already exceed the threshold of significance under existing conditions and would therefore be considered cumulative impacts and mitigation is required. Phase 1 of the project would cause a direct project impact at the other three intersections and mitigation is required.

Phase 1 of the project would worsen the existing LOS deficiency at the following 12 intersections under existing with Phase 1 conditions:

- Redlands Boulevard/Locust Avenue;
- Redlands Boulevard/SR-60 Westbound Ramps;
- Oliver Street/Alessandro Boulevard;
- Lasselle Street/Cactus Avenue;
- Gilman Springs Road/Bridge Street;
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road;
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road;
- San Timoteo Canyon Road/Alessandro Boulevard;
- San Timoteo Canyon Road/Live Oak Canyon Road;
- Redlands Boulevard/San Timoteo Canyon Road;
- Moreno Beach Drive/SR-60 EB Ramps; and
- Alessandro Boulevard/Chicago Avenue.

A project-specific significant impact would occur at the following three intersections under existing with Phase 1 conditions:

- Redlands Boulevard/Cactus Avenue;
- Arlington Avenue/Victoria Avenue; and
- Moreno Beach Drive/John Kennedy Drive.

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Table 4.15.AA-1: Existing (2012) plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
1	Theodore Str/Street F	D	N/A	Non-Existent		RABT	9.5	A
2	Cactus Avenue Extension/Street E	D	N/A	Non-Existent		AWS	12.3	B
3	Theodore Str/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	9.7	A	RABT	10.4	B
4	Street C/Street F	D	N/A	Non-Existent		AWS	9.5	A
6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	CSS	10.3	B	SIGNAL	20.9	C
9	Gilman Springs Rd/Eucalyptus Ave	—	N/A	Non-Existent		N/A	Non-Existent	
10	Redlands Blvd/Locust Ave	C	CSS	26.7	D	CSS	44.8	E
11	Redlands Blvd/Ironwood Ave	D	SIGNAL	40.9	D	SIGNAL	37.5	D
12	Theodore Street/Ironwood Avenue	D	CSS	9.7	A	CSS	12.6	B
13	Redlands Blvd/SR-60 WB ramps	D	CSS	42.2	E	CSS	70.5	F
14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	9.6	A	SIGNAL	12.9	B
15	Theodore Str/SR-60 WB ramps	D	CSS	9.0	A	CSS	13.3	B
16	Theodore Str/SR-60 EB ramps	D	CSS	9.2	A	CSS	2.4	A
17	Quincy Str/Fir Ave	—	N/A	Non-Existent		N/A	Non-Existent	
18	Redlands Blvd/Eucalyptus Ave (Fir)	D	N/A	Non-Existent		SIGNAL	12.9	B
19	Theodore Str/Fir Ave (Eucalyptus)	D	CSS	9.2	A	SIGNAL	12.4	B
20	Oliver Str/Alessandro Blvd	C	CSS	25.9	D	CSS	40.5	E
21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	24.0	C	SIGNAL	27.9	C
22	Quincy Str/Alessandro Blvd	—	N/A	Non-Existent		N/A	Non-Existent	
23	Redlands Blvd/Alessandro Blvd	C	AWS	20.5	C	AWS	17.6	C
24	Oliver Str/Cactus Ave	D	SIGNAL	23.8	C	SIGNAL	26.2	C
25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	16.0	B	SIGNAL	17.9	B
26	Quincy Str/Cactus Ave	—	N/A	Non-Existent		N/A	Non-Existent	
27	Redlands Blvd/Cactus Ave	C	AWS	11.4	B	AWS	37.9	E
28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	16.2	B	SIGNAL	17.0	B
29	Heacock Str/Ironwood Ave	D	SIGNAL	29.6	C	SIGNAL	29.9	C
30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	22.6	C	SIGNAL	23.4	C
31	Heacock St/SR-60 EB Ramps	D	SIGNAL	12.5	B	SIGNAL	13.9	B
32	Sunnymead Blvd & Perris Blvd	D	SIGNAL	29.4	C	SIGNAL	30.7	C

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Table 4.15.AA-1: Existing (2012) plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	22.0	C	SIGNAL	24.6	C
34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	22.8	C	SIGNAL	23.8	C
35	Moreno Beach Dr/Locust Ave	C	CSS	8.6	A	CSS	8.8	A
36	Moreno Beach Drive & Ironwood Avenue	D	SIGNAL	50.3	D	SIGNAL	51.8	D
37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	38.0	D	SIGNAL	42.0	D
38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	37.0	D	SIGNAL	37.6	D
39	Iris Ave/Perris Blvd	D	SIGNAL	41.5	D	SIGNAL	43.0	D
40	Kitching St/Iris Ave	C	SIGNAL	23.4	C	SIGNAL	25.0	C
41	Lasselle Str/Iris Ave	D	SIGNAL	25.4	C	SIGNAL	28.5	C
42	Nason Str/Iris Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
43	Oliver Str/Iris Ave	D	SIGNAL	22.1	C	SIGNAL	25.6	C
44	Via Dell Lago/Iris Ave	C	SIGNAL	6.7	A	SIGNAL	8.0	A
45	Krameria Ave/Perris Blvd	D	SIGNAL	34.6	C	SIGNAL	35.1	D
46	Kitching Str/Krameria Ave	D	SIGNAL	21.7	C	SIGNAL	23.9	C
47	Lasselle Str/Krameria Ave	D	SIGNAL	37.9	D	SIGNAL	40.8	D
48	Kitching Str/Alessandro Blvd	D	SIGNAL	28.8	C	SIGNAL	29.6	C
49	Lasselle Str/Alessandro Blvd	D	SIGNAL	31.7	C	SIGNAL	32.2	C
50	Morrison Str/Alessandro Blvd	D	SIGNAL	8.8	A	SIGNAL	8.8	A
51	Nason Str/Alessandro Blvd	D	SIGNAL	20.5	C	SIGNAL	20.7	C
52	Kitching Str/Cactus Ave	C	SIGNAL	33.3	C	SIGNAL	34.3	C
53	Lasselle Str/Cactus Ave	C	SIGNAL	47.2	D	SIGNAL	47.3	D
54	Morrison Str/Cactus Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
55	Nason Str/Cactus Ave	D	SIGNAL	22.5	C	SIGNAL	22.6	C
56	Frederick Str/Alessandro Blvd	D	SIGNAL	19.5	B	SIGNAL	19.5	B
57	Graham Str/Alessandro Blvd	D	SIGNAL	19.8	B	SIGNAL	20.4	C
58	Heacock Str/Alessandro Blvd	D	SIGNAL	25.8	C	SIGNAL	26.3	C
59	Indian Str/Alessandro Blvd	D	SIGNAL	17.6	B	SIGNAL	19.2	B
60	Perris Blvd/Alessandro Blvd	D	SIGNAL	32.4	C	SIGNAL	32.7	C
61	Frederick Str/Cactus Ave	D	SIGNAL	9.8	A	SIGNAL	10.3	B
62	Graham Str/Cactus Ave	D	SIGNAL	12.9	B	SIGNAL	13.7	B

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Table 4.15.AA-1: Existing (2012) plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
63	Heacock Str/Cactus Ave	D	SIGNAL	30.1	C	SIGNAL	30.9	C
64	Indian Str/Cactus Ave	C	SIGNAL	24.4	C	SIGNAL	25.3	C
65	Perris Blvd/Cactus Ave	D	SIGNAL	26.9	C	SIGNAL	26.8	C
66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	25.8	C	SIGNAL	26.1	C
67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	6.4	A	SIGNAL	6.7	A
68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	19.4	B	SIGNAL	19.9	B
69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	18.2	B	SIGNAL	18.4	B
70	Day Str/Alessandro Blvd	D	SIGNAL	4.6	A	SIGNAL	6.2	A
71	Eisworth Str/Alessandro Blvd	D	SIGNAL	19.2	B	SIGNAL	19.6	B
72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	12.1	B	SIGNAL	18.7	B
73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	11.1	B	SIGNAL	10.3	B
74	Eisworth Str/Cactus Ave	D	SIGNAL	26.7	C	SIGNAL	30.6	C
75	Central Ave/Lochmoor Dr.	D	SIGNAL	10.9	B	SIGNAL	11.4	B
76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	22.2	C	SIGNAL	23.9	C
77	SR-60 EB Ramps/Central Ave	D	SIGNAL	7.3	A	SIGNAL	8.3	A
78	SR-60 WB Ramps/Central Ave	D	SIGNAL	6.8	A	SIGNAL	6.9	A
79	Alessandro Blvd/Trautwein Rd.	D	SIGNAL	28.4	C	SIGNAL	28.4	C
80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	18.8	B	SIGNAL	20.7	C
81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	43.2	D	SIGNAL	43.8	D
82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	9.0	A	SIGNAL	9.2	A
83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	43.2	D	SIGNAL	47.8	D
84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	8.6	A	SIGNAL	8.8	A
85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	24.3	C	AWS	26.9	D
86	Central Ave/Chicago Ave	D	SIGNAL	23.4	C	SIGNAL	23.7	C
87	Central Ave/EI Cerrito Dr	D	SIGNAL	11.7	B	SIGNAL	12.9	B
88	Central Ave/Canyon Crest Dr	D	SIGNAL	27.8	C	SIGNAL	28.6	C
89	Chicago Ave/Country Club Dr	D	SIGNAL	6.3	A	SIGNAL	6.7	A
90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	31.3	C	SIGNAL	31.6	C
91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	21.0	C	SIGNAL	21.1	C
92	Arlington Ave/Maude St	D	SIGNAL	13.8	B	SIGNAL	14.1	B

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ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
93	Horace St/Arlington Ave	D	SIGNAL	12.3	B	SIGNAL	13.0	B
94	Arlington Ave/Victoria Ave	D	SIGNAL	54.8	D	SIGNAL	55.8	E
95	Alessandro Blvd/Chicago Ave	D	SIGNAL	40.7	D	SIGNAL	42.9	D
96	Alessandro Blvd/Century Ave	D	SIGNAL	16.7	B	SIGNAL	17.8	B
97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	30.7	C	SIGNAL	30.6	C
98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	20.4	C	SIGNAL	25.3	C
99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	15.4	B	SIGNAL	16.5	B
100	Harley Knox Blvd/Evan Rd	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
101	Ramona Expy/Indian St	E	SIGNAL	3.3	A	SIGNAL	4.5	A
102	Ramona Expy/Perris Blvd	E	SIGNAL	31.7	C	SIGNAL	32.5	C
103	Ramona Expy/Evans Rd	E	SIGNAL	54.5	D	SIGNAL	58.1	E
104	Perris Blvd/Morgan St	D	SIGNAL	11.8	B	SIGNAL	13.6	B
105	Evans Rd/Morgan St	C	SIGNAL	32.5	C	SIGNAL	32.5	C
106	Perris Blvd/Rider St	C	SIGNAL	24.5	C	SIGNAL	24.5	C
107	Evans Rd/Rider St	C	SIGNAL	34.2	C	SIGNAL	34.4	C
108	Perris Blvd/Mid County Pkwy WB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
109	Perris Blvd/Mid County Pkwy EB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
110	Evans Rd/Mid County Pkwy WB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
111	Evans Rd/Mid County Pkwy EB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
112	Placentia Ave/Perris Blvd	D	SIGNAL	30.1	C	SIGNAL	29.9	C
113	Evans Rd/Placentia Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
114	Evans Rd/Orange Ave	C	AWS	12.5	B	AWS	13.6	B
115	Evans Rd/Nuevo Rd	C	SIGNAL	23.3	C	SIGNAL	23.5	C
116	Evans Rd/Ellis Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
117	Ellis Ave/I-215 SB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
118	Ellis Ave/SR-215 NB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
119	Evans Rd/San Jacinto Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
120	Park Center Blvd/Ramona Expy WB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
121	Park Center Blvd/Ramona Expy EB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
122	Bridge St/Ramona Expy	C	CSS	22.4	C	CSS	26.2	C

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Table 4.15.AA-1: Existing (2012) plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
123	Gilman Springs Rd/Bridge Str	C	CSS	26.6	D	CSS	37.9	E
124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	34.7	D	CSS	56.8	F
125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	29.2	D	CSS	36.6	E
126	Ramona Expy/Sanderson Ave	D	SIGNAL	27.1	C	SIGNAL	28.2	C
127	Potrero Blvd/SR-60 WB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
128	Potrero Blvd/SR-60 EB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
129	W 6th St/California Ave	C	AWS	16.6	C	AWS	20.2	C
130	W 6th St/Beaumont Ave	C	SIGNAL	13.2	B	SIGNAL	12.7	B
131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	18.9	B	SIGNAL	21.5	C
132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	77.2	F	AWS	145.4	F
133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	50.9	F	AWS	110.2	F
134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	81.8	F	AWS	142.8	F
135	W Crescent Ave/Alessandro Rd	C	CSS	14.0	B	CSS	16.9	C
136	W Sunset Dr/Alessandro Rd	C	AWS	8.9	A	AWS	9.7	A

denotes LOS exceeding the target threshold

Notes: "CSS" means cross-street is stop-controlled
"AWS" means all-way stop

"NB" and "SB" denote northbound and southbound respectively

"RABT" means roundabout

"EB" and "WB" denote eastbound and westbound respectively

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15.AA-2: Existing (2012) plus Phase 1 Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
1	Theodore St/Street F	D	N/A	N/A	Non-Existent	RABT	12.1	B
2	Street D/Street E	D	N/A	N/A	Non-Existent	AWS	13.2	B
3	Theodore Ave/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	10.1	B	RABT	10.5	B
4	Street C/Street F	D	N/A	N/A	Non-Existent	AWS	8.4	A
6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	CSS	15.7	C	SIGNAL	31.2	C
9	Gilman Springs Rd/Eucalyptus Ave	—	N/A	N/A	Non-Existent	N/A	Non-Existent	

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Table 4.15.AA-2: Existing (2012) plus Phase 1 Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
10	Redlands Blvd/Locust Ave	C	CSS	42.8	E	CSS	> 180.0	F
11	Redlands Blvd/Ironwood Ave	D	SIGNAL	37.3	D	SIGNAL	35.2	D
12	Theodore Street/Ironwood Avenue	D	CSS	9.8	A	CSS	15.9	C
13	Redlands Blvd/SR-60 WB ramps	D	CSS	54.0	F	CSS	> 180.0	F
14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	14.4	B	SIGNAL	20.3	C
15	Theodore Str/SR-60 WB ramps	D	CSS	9.6	A	CSS	13.7	B
16	Theodore Str/SR-60 EB ramps	D	CSS	9.4	A	CSS	1.5	A
17	Quincy Str/Fir Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
18	Redlands Blvd/Eucalyptus Ave (Fir)	D	N/A	Non-Existent	Non-Existent	SIGNAL	10.6	B
19	Theodore Ave/Fir Ave (Eucalyptus)	D	CSS	9.8	A	SIGNAL	27.1	C
20	Oliver Str/Alessandro Blvd	C	CSS	14.7	B	CSS	18.6	C
21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	28.2	C	SIGNAL	38.6	D
22	Quincy Str/Alessandro Blvd	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
23	Redlands Blvd/Alessandro Blvd	C	AWS	13.8	B	AWS	14.9	B
24	Oliver Str/Cactus Ave	D	SIGNAL	17.3	B	SIGNAL	18.1	B
25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	17.0	B	SIGNAL	18.9	B
26	Quincy Str/Cactus Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
27	Redlands Blvd/Cactus Ave	C	AWS	8.2	A	AWS	103.0	F
28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	13.8	B	SIGNAL	66.5	E
29	Heacock Str/Ironwood Ave	D	SIGNAL	31.9	C	SIGNAL	32.0	C
30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	21.5	C	SIGNAL	21.7	C
31	Heacock St/SR-60 EB Ramps	D	SIGNAL	15.9	B	SIGNAL	16.8	B
32	Sunnymead Blvd & Perris Blvd	D	SIGNAL	36.0	D	SIGNAL	36.4	D
33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	19.7	B	SIGNAL	21.5	C
34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	23.4	C	SIGNAL	23.9	C
35	Moreno Beach Dr/Locust Ave	C	CSS	8.6	A	CSS	8.9	A
36	Moreno Beach Drive & Ironwood Avenue	D	SIGNAL	40.0	D	SIGNAL	41.6	D
37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	76.6	E	SIGNAL	98.0	F
38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	31.2	C	SIGNAL	31.8	C
39	Iris Ave/Perris Blvd	D	SIGNAL	36.5	D	SIGNAL	37.0	D

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ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
40	Kitching Str/Iris Ave	C	SIGNAL	17.5	B	SIGNAL	20.1	C
41	Lasselle Str/Iris Ave	D	SIGNAL	26.6	C	SIGNAL	28.4	C
42	Nason Str/Iris Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
43	Oliver Str/Iris Ave	D	SIGNAL	15.8	B	SIGNAL	18.3	B
44	Via Dell Lago/Iris Ave	C	SIGNAL	6.5	A	SIGNAL	7.3	A
45	Krameria Ave/Perris Blvd	D	SIGNAL	29.3	C	SIGNAL	33.7	C
46	Kitching Str/Krameria Ave	D	SIGNAL	19.4	B	SIGNAL	20.2	C
47	Lasselle Str/Krameria Ave	D	SIGNAL	13.5	B	SIGNAL	13.7	B
48	Kitching Str/Alessandro Blvd	D	SIGNAL	24.7	C	SIGNAL	25.4	C
49	Lasselle Str/Alessandro Blvd	D	SIGNAL	26.6	C	SIGNAL	29.5	C
50	Morrison Str/Alessandro Blvd	D	SIGNAL	7.8	A	SIGNAL	8.1	A
51	Nason Str/Alessandro Blvd	D	SIGNAL	16.9	B	SIGNAL	18.2	B
52	Kitching Str/Cactus Ave	C	SIGNAL	22.6	C	SIGNAL	22.7	C
53	Lasselle Str/Cactus Ave	C	SIGNAL	38.6	D	SIGNAL	38.6	D
54	Morrison Str/Cactus Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
55	Nason Str/Cactus Ave	D	SIGNAL	21.0	C	SIGNAL	21.8	C
56	Frederick Str/Alessandro Blvd	D	SIGNAL	25.6	C	SIGNAL	26.5	C
57	Graham Str/Alessandro Blvd	D	SIGNAL	24.2	C	SIGNAL	26.0	C
58	Heacock Str/Alessandro Blvd	D	SIGNAL	23.6	C	SIGNAL	24.1	C
59	Indian Str/Alessandro Blvd	D	SIGNAL	27.9	C	SIGNAL	28.7	C
60	Perris Blvd/Alessandro Blvd	D	SIGNAL	42.3	D	SIGNAL	44.2	D
61	Frederick Str/Cactus Ave	D	SIGNAL	11.7	B	SIGNAL	13.8	B
62	Graham Str/Cactus Ave	D	SIGNAL	17.4	B	SIGNAL	17.9	B
63	Heacock Str/Cactus Ave	D	SIGNAL	20.3	C	SIGNAL	22.9	C
64	Indian Str/Cactus Ave	C	SIGNAL	19.6	B	SIGNAL	19.3	B
65	Perris Blvd/Cactus Ave	D	SIGNAL	30.7	C	SIGNAL	30.6	C
66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	18.0	B	SIGNAL	18.1	B
67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	12.6	B	SIGNAL	12.7	B
68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	24.1	C	SIGNAL	25.0	C
69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	18.6	B	SIGNAL	20.0	B

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ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
70	Day Str/Alessandro Blvd	D	SIGNAL	8.2	A	SIGNAL	9.9	A
71	Eisworth Str/Alessandro Blvd	D	SIGNAL	27.6	C	SIGNAL	29.0	C
72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	19.7	B	SIGNAL	40.1	D
73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	3.7	A	SIGNAL	4.1	A
74	Eisworth Str/Cactus Ave	D	SIGNAL	29.5	C	SIGNAL	29.2	C
75	Central Ave/Lochmoor Dr.	D	SIGNAL	6.7	A	SIGNAL	7.7	A
76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	17.6	B	SIGNAL	18.6	B
77	SR-60 EB Ramps/Central Ave	D	SIGNAL	10.3	B	SIGNAL	10.6	B
78	SR-60 WB Ramps/Central Ave	D	SIGNAL	8.2	A	SIGNAL	8.3	A
79	Alessandro Blvd/Trautwein Rd.	D	SIGNAL	14.8	B	SIGNAL	14.8	B
80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	34.9	C	SIGNAL	36.9	D
81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	36.5	D	SIGNAL	38.3	D
82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	13.0	B	SIGNAL	13.4	B
83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	28.0	C	SIGNAL	28.9	C
84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	4.7	A	SIGNAL	5.5	A
85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	12.2	B	AWS	13.0	B
86	Central Ave/Chicago Ave	D	SIGNAL	23.1	C	SIGNAL	26.7	C
87	Central Ave/EI Cerrito Dr	D	SIGNAL	12.0	B	SIGNAL	12.6	B
88	Central Ave/Canyon Crest Dr	D	SIGNAL	35.2	D	SIGNAL	36.5	D
89	Chicago Ave/Country Club Dr	D	SIGNAL	4.9	A	SIGNAL	4.9	A
90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	30.7	C	SIGNAL	30.9	C
91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	20.8	C	SIGNAL	20.9	C
92	Arlington Ave/Maude St	D	SIGNAL	11.1	B	SIGNAL	11.6	B
93	Horace St/Arlington Ave	D	SIGNAL	7.2	A	SIGNAL	7.6	A
94	Arlington Ave/Victoria Ave	D	SIGNAL	30.9	C	SIGNAL	32.5	C
95	Alessandro Blvd/Chicago Ave	D	SIGNAL	65.9	E	SIGNAL	70.0	E
96	Alessandro Blvd/Century Ave	D	SIGNAL	7.6	A	SIGNAL	8.7	A
97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	18.9	B	SIGNAL	18.7	B
98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	17.9	B	SIGNAL	17.7	B
99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	15.1	B	SIGNAL	15.5	B

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ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
100	Harley Knox Blvd/Evan Rd	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
101	Ramona Expy/Indian St	E	SIGNAL	8.5	A	SIGNAL	11.1	
102	Ramona Expy/Perris Blvd	E	SIGNAL	34.6	C	SIGNAL	34.8	
103	Ramona Expy/Evans Rd	E	SIGNAL	28.8	C	SIGNAL	28.7	
104	Perris Blvd/Morgan St	D	SIGNAL	6.7	A	SIGNAL	8.7	
105	Evans Rd/Morgan St	C	SIGNAL	20.6	C	SIGNAL	20.4	
106	Perris Blvd/Rider St	C	SIGNAL	22.9	C	SIGNAL	26.8	
107	Evans Rd/Rider St	C	SIGNAL	28.3	C	SIGNAL	27.8	
108	Perris Blvd/Mid-County Pkwy WB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
109	Perris Blvd/Mid-County Pkwy EB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
110	Evans Rd/Mid-County Pkwy WB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
111	Evans Rd/Mid-County Pkwy EB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
112	Placentia Ave/Perris Blvd	D	SIGNAL	14.0	B	SIGNAL	15.1	
113	Evans Rd/Placentia Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
114	Evans Rd/Orange Ave	C	AWS	10.1	B	AWS	10.7	
115	Evans Rd/Nuevo Rd	C	SIGNAL	22.6	C	SIGNAL	22.5	
116	Evans Rd/Ellis Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
117	Ellis Ave/I-215 SB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
118	Ellis Ave/SR-215 NB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
119	Evans Rd/San Jacinto Ave	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
120	Park Center Blvd/Ramona Expy WB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
121	Park Center Blvd/Ramona Expy EB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
122	Bridge St/Ramona Expy	C	CSS	20.6	C	CSS	25.5	
123	Gilman Springs Rd/Bridge Str	C	CSS	20.8	C	CSS	23.7	
124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	30.7	D	CSS	41.0	
125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	48.2	E	CSS	63.6	
126	Ramona Expy/Sanderson Ave	D	SIGNAL	20.8	C	SIGNAL	21.0	
127	Potrero Blvd/SR-60 WB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
128	Potrero Blvd/SR-60 EB Ramps	—	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
129	W 6th St/California Ave	C	AWS	18.0	C	AWS	20.9	

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Table 4.15.AA-2: Existing (2012) plus Phase 1 Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
130	W 6th St/Beaumont Ave	C	SIGNAL	12.8	B	SIGNAL	11.9	B
131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	6.3	A	SIGNAL	6.5	A
132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	23.9	C	AWS	68.8	F
133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	60.2	F	AWS	135.8	F
134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	80.5	F	AWS	170.0	F
135	W Crescent Ave/Alessandro Rd	C	CSS	11.5	B	CSS	13.5	B
136	W Sunset Dr/Alessandro Rd	C	AWS	9.0	A	AWS	9.8	A

denotes LOS exceeding the target threshold

"CSS" means cross-street is stop-controlled

"AWS" means all-way stop

"RABT" means roundabout

"NB" and "SB" denote northbound and southbound, respectively

"EB" and "WB" denote eastbound and westbound, respectively

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Roadway Analysis. Existing baseline (year 2012) with Phase 1 roadway segment levels of service for the study area are summarized in Table 4.15.AB, which shows two roadway segments would operate at unsatisfactory levels of service. Phase 1 of the project would contribute toward the worsening of an already unsatisfactory LOS at the two roadway segments and, therefore, have a significant cumulative impact at these locations.

Phase 1 of the project would worsen the existing LOS deficiency at the following two roadway segments under existing with Phase 1 conditions:

- Gilman Springs Road between Alessandro Boulevard and Bridge Street; and
- Gilman Springs Road between SR-60 and Alessandro Boulevard.

Freeway Segment Analysis. Existing (2012) with Phase 1 freeway segment levels of service for the study area are summarized in Tables 4.15.AC-1 and 4.15.AC-2, which show seventeen freeway segments already operate at unsatisfactory levels of service. Phase 1 of the project would contribute toward the worsening of an already unsatisfactory LOS at sixteen locations and, therefore, have a cumulative impact at these locations and mitigation is required. Phase 1 of the project would create a significant impact and mitigation is required at the other location, since the project would decrease the LOS from satisfactory to unsatisfactory.

Phase 1 of the project would worsen the existing LOS deficiency at the following sixteen freeway segments under existing with Phase 1 conditions:

Northbound or Eastbound Sections (Table 4.15.AC-1):

- SR-60 Ramona Avenue to Central Avenue;
- SR-60 Central Avenue to Mountain Avenue;
- SR-60 Euclid Avenue to Grove Avenue;
- SR-60 Grove Avenue to Vineyard Avenue;
- SR-60 Vineyard Avenue to Archibald Avenue;
- SR-60 Market Street to Main Street;
- SR-60 Martin Luther King Boulevard to Central Avenue;
- SR-91 I-15 to McKinley Street;
- I-215 SR-74 to Redlands Avenue.
- Southbound or Westbound Sections (Table 4.15.AC-2):
 - SR-60 Reservoir Street to Ramona Avenue;
 - SR-60 Ramona Avenue to Central Avenue
 - SR-60 I-215 to Day Street;
 - SR-91 Pierce Street to Magnolia Avenue;
 - SR-91 Magnolia Avenue to La Sierra Avenue;
 - I-215 SR-74 to Redlands Avenue; and
 - I-215 Baseline Road to Highland Avenue.

A direct significant project impact would occur at the following one freeway segment under existing with Phase 1 conditions (Table 4.15.AC-1):

- Northbound or Eastbound Sections:
 - SR-91 Central Avenue to 14th Street.

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Table 4.15.AB: Existing (2012) Plus Phase 1 Roadway Segment Levels of Service

Roadway	From	To	LOS Standard*	Existing Conditions			Existing Plus Phase 1 Conditions			Project Significant Impact?	Mitigation Measures Required to Reduce Project Impacts to Less-Than-Significant	LOS After Mitigation
				Roadway Section**	Daily Volume	LOS	Roadway Section*	Daily Volume	LOS			
S-1 Theodore Street (A)	SR-60 WB Ramps	Ironwood Avenue	D	2U	771	A	2U	2,709	A			
S-2 Theodore Street (A)	SR-60 EB Ramps	Fir (Eucalyptus) Ave.	D	2U	2,046	A	6D	26,532	A			
S-3 Fir (Eucalyptus) Ave.	Redlands Blvd	Theodore Street (A)	D	2U***	1,339	A	4D	2,102	A			
S-4 Eucalyptus Ave (B)	Theodore Street (A)	Gilman Springs Rd	N/A		Future Road			Future Road				
S-5 Theodore Street (A)	Fir (Eucalyptus) Ave.	Street E	D	2U	641	A	6D	27,883	A			
S-6 Street E	Theodore Street (A)	Cactus Ave Extension	D		Future Road			14,240	A			
S-7 Street F	Theodore Street (A)	Alessandro Blvd (Street C)	D		Future Road			2,242	A			
S-8 Theodore Street (A)	Fir (Eucalyptus) Ave.	Alessandro Blvd (Street C)	D	2U	641	A	4D	10,443	A			
S-9 Alessandro Blvd (Street E)	Merwin Street	Theodore Street (A)	D	2U	2,537	A	4U	5,761	A			
S-10 Cactus Ave Extension	Alessandro Blvd (Street E)	Cactus Ave.	D		Future Road			9,250	A			
S-11 Alessandro Blvd (Street C)	Theodore Street (A)	Street F	D	2U	1,896	A	4U	4,006	A			
S-13 Alessandro Blvd (Street C)	Street F	Gilman Springs Rd	D	2U	1,896	A	4U	3,799	A			
S-14 Alessandro Blvd	Moreno Beach Drive	Redlands Blvd	D	2U	3,877	A	2U	3,367	A			
S-16 Gilman Springs Rd	Alessandro Blvd (Street C)	Bridge Street	D	2U	14,407	F	2U	14,970	F	Yes	Widen to 4 lanes	
S-17 Gilman Springs Rd	SR-60	Alessandro Blvd (Street C)	D	2U	11,973	E	2U	11,973	E	Yes	Widen to 4 lanes	
S-18 Redlands Blvd	SR-60 EB Ramps	Fir (Eucalyptus) Ave.	D	2U	7,338	A	2U	9,634	C			
S-19 Redlands Blvd	Fir (Eucalyptus) Ave.	Alessandro Blvd	C	2U	6,786	A	2U	4,146	A			
S-20 Alessandro Blvd	Redlands Blvd	Merwin Street	C	2U	2,537	A	2U	565	A			
S-21 Redlands Blvd	Alessandro Blvd	Cactus Ave.	C	2U	6,786	A	2U	3,415	A			
S-22 Cactus Ave.	Redlands Blvd	Cactus Ave Extension	C	2U***	472	A	2U	9,250	C			

* LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways.

** Section is the number of lanes, with "U" for "undivided" and "D" for "divided" roadways.

*** Road currently has 2 lanes in one direction and 1 lane in the other. The capacity shown is based on the narrower direction.

█ Indicates LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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**Table 4.15.AC-1: Existing (2012) Plus Phase 1 Freeway Mainline Levels of Service
(Northbound/Eastbound Directions)**

ID	Freeway	Segment	Existing Conditions						Existing Plus Phase 1 Conditions					
			Northbound / Eastbound						Northbound / Eastbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-2	SR-60	Reservoir St to Ramona Ave	6,024	24.5	C	7,822	33.0	D	6,200	25.7	C	7,770	32.9	D
F-3	SR-60	Ramona Ave to Central Ave	5,687	22.8	C	9,400	47.3	F	5,880	24.0	C	9,330	47.0	F
F-4	SR-60	Central Ave to Mountain Ave	6,339	26.2	D	9,338	46.6	F	6,540	27.6	D	9,280	46.4	F
F-5	SR-60	Mountain Ave to Euclid Ave	6,205	25.4	C	6,664	26.1	D	6,410	26.9	D	6,590	26.0	D
F-6	SR-60	Euclid Ave to Grove Ave	7,650	34.7	D	9,091	43.8	E	7,860	36.7	E	9,010	43.4	E
F-7	SR-60	Grove Ave to Vineyard Ave	6,923	29.6	D	9,400	47.3	F	7,130	31.2	D	9,320	46.9	F
F-8	SR-60	Vineyard Ave to Archibald Ave	6,823	28.7	D	9,400	47.3	F	7,030	30.3	D	9,310	46.7	F
F-9	SR-60	Archibald Ave to Haven Ave	6,268	25.6	C	6,471	25.1	C	6,480	27.1	D	6,370	24.9	C
F-10	SR-60	Haven Ave to Milliken Ave	6,096	19.1	C	6,864	20.6	C	6,310	20.0	C	6,750	20.5	C
F-11	SR-60	Milliken Ave to I-15	4,234	16.5	B	4,529	16.9	B	4,430	17.6	B	4,430	16.7	B
F-12	SR-60	I-15 to Etiwanda Ave/Van Buren Blvd	2,593	10.2	A	2,910	10.8	A	2,840	11.4	B	2,770	10.5	A
F-13	SR-60	Etiwanda Ave/Van Buren Blvd to Mission	3,026	11.9	B	3,968	14.8	B	3,290	13.2	B	3,850	14.5	B
F-14	SR-60	Mission Blvd/Country Village Rd to Pedley Rd	2,596	10.2	A	3,061	11.4	B	2,860	11.6	B	2,950	11.2	B
F-15	SR-60	Pedley Rd to Pyrite St	2,813	11.1	B	3,334	12.4	B	3,100	12.5	B	3,160	12.0	B
F-16	SR-60	Pyrite St to Valley Way	3,348	13.2	B	3,642	13.6	B	3,640	14.6	B	3,460	13.1	B
F-17	SR-60	Valley Way to Rubidoux Blvd	4,398	23.7	C	4,252	21.4	C	4,690	26.2	D	4,080	20.8	C
F-18	SR-60	Rubidoux Blvd to Market St	4,943	27.6	D	4,706	24.3	C	5,250	30.7	D	4,600	24.0	C
F-19	SR-60	Market St to Main St	4,498	24.4	C	7,050	47.8	F	4,800	27.0	D	6,940	47.1	F
F-20	SR-60	Main to SR-91	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-24	SR-60	Martin Luther King Blvd to Central Ave	5,865	24.6	C	8,976	45.7	F	6,280	29.7	D	8,860	48.9	F
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	4,332	16.9	B	6,795	26.6	D	4,680	18.9	C	6,750	26.9	D
F-27	SR-60	I-215 to Day St	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-29	SR-60	Pigeon Pass Rd to Heacock St	2,702	21.6	C	3,713	30.2	D	3,050	26.8	D	3,770	32.6	D
F-30	SR-60	Heacock St to Perris Blvd	2,349	18.6	C	3,355	26.1	D	2,840	24.6	C	3,420	28.3	D
F-31	SR-60	Perris Blvd to Nason St	1,812	14.3	B	2,344	17.4	B	2,340	19.8	C	2,460	19.4	C
F-32	SR-60	Nason St to Moreno Beach Dr	1,619	12.8	B	2,038	15.1	B	2,070	17.7	B	2,160	17.0	B
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	1,326	10.5	A	1,397	10.4	A	1,930	16.7	B	1,660	13.5	B
F-34	SR-60	Redlands Blvd to Theodore St	1,614	12.7	B	1,920	14.2	B	2,310	19.7	C	2,260	18.0	B
F-35	SR-60	Theodore St to Gilman Springs Rd	1,521	12.0	B	1,915	14.2	B	1,480	11.8	B	1,900	14.3	B
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	1,213	11.2	B	1,484	12.3	B	1,190	11.7	B	1,590	14.4	B
F-37	SR-60	Jack Rabbit Trail to I-10	1,215	9.6	A	1,482	11.0	A	1,200	9.6	A	1,590	12.0	B
F-39	SR-91	I-15 to McKinley St	5,914	22.6	C	9,400	53.3	F	6,030	23.3	C	9,350	52.5	F
F-40	SR-91	McKinley St to Pierce St	5,382	29.1	D	5,427	31.4	D	5,510	30.4	D	5,370	31.1	D
F-41	SR-91	Pierce St to Magnolia Ave	4,888	25.5	C	4,922	27.2	D	5,020	26.8	D	4,860	26.9	D
F-42	SR-91	Magnolia Ave to La Sierra Ave	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-43	SR-91	La Sierra Ave to Tyler St	4,585	23.5	C	4,939	27.3	D	4,700	24.6	C	4,890	27.2	D
F-44	SR-91	Tyler St to Van Buren Blvd	5,704	21.7	C	5,851	23.5	C	5,810	22.3	C	5,810	23.4	C

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**Table 4.15.AC-1: Existing (2012) Plus Phase 1 Freeway Mainline Levels of Service
(Northbound/Eastbound Directions)**

ID	Freeway	Segment	Existing Conditions						Existing Plus Phase 1 Conditions					
			Northbound / Eastbound						Northbound / Eastbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-45	SR-91	Van Buren Blvd to Adam St	5,841	22.3	C	4,999	19.6	C	5,930	22.8	C	4,970	19.6	C
F-46	SR-91	Adam St to Madison St	6,531	26.1	D	4,742	18.7	C	6,620	26.7	D	4,720	18.7	C
F-47	SR-91	Madison St to Arlington Ave	5,879	22.8	C	4,530	17.9	B	5,960	23.4	C	4,510	17.9	B
F-49	SR-91	Central Ave to 14th St	6,021	34.8	D	5,391	30.8	D	6,070	35.6	E	5,400	31.2	D
F-51	SR-91	University Ave to Spruce St	7,244	22.1	C	6,394	20.0	C	7,280	22.3	C	6,410	20.2	C
F-66	I-215	Scott Rd to Newport Rd	2,739	22.0	C	3,285	25.8	C	2,700	21.8	C	3,280	25.7	C
F-68	I-215	Newport Rd to McCall Blvd	1,900	15.0	B	2,047	15.3	B	1,860	14.8	B	2,050	15.4	B
F-69	I-215	McCall Blvd to Ethanac Rd	2,457	19.5	C	3,293	25.8	C	2,400	19.1	C	3,290	25.8	C
F-70	I-215	Ethanac Rd to SR-74	3,787	34.5	D	3,150	24.4	C	3,730	33.9	D	3,160	24.5	C
F-71	I-215	SR-74 to Redlands Ave	3,350	28.5	D	4,181	37.4	E	3,290	27.9	D	4,210	37.9	E
F-74	I-215	Columbia Ave to Center St	5,587	33.5	D	5,150	27.3	D	5,550	33.1	D	5,230	27.9	D
F-75	I-215	Center St to La Cadena Dr	5,474	32.4	D	5,034	26.5	D	5,440	32.1	D	5,100	27.0	D
F-76	I-215	La Cadena Dr to Barton Rd	5,341	31.2	D	5,164	27.5	D	5,300	30.8	D	5,230	27.9	D
F-77	I-215	Barton Rd to Mt. Vernon Ave	5,738	35.1	E	5,533	30.3	D	5,680	34.5	D	5,620	31.1	D
F-78	I-215	Mt. Vernon Ave to I-10	5,582	22.5	C	5,420	20.5	C	5,510	22.1	C	5,510	20.8	C
F-80	I-215	Auto Plaza Dr to Mill St	4,319	17.1	B	4,533	17.0	B	4,240	16.7	B	4,580	17.1	B
F-83	I-215	Baseline Rd to Highland Ave	3,023	24.8	C	3,355	26.5	D	2,970	24.2	C	3,400	27.0	D
F-52	I-10	SR-60 to Beaumont Ave	3,037	11.9	B	4,252	16.4	B	3,040	11.9	B	4,320	16.8	B
F-53	I-10	Beaumont Ave to Pennsylvania Ave	3,087	12.1	B	4,322	16.7	B	3,080	12.1	B	4,370	17.0	B
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	3,236	12.6	B	4,531	17.5	B	3,220	12.6	B	4,580	17.8	B
F-55	I-10	Highland Springs Ave to Sunset Ave	3,112	12.2	B	4,357	16.8	B	3,080	12.1	B	4,390	17.0	B
F-56	I-10	Sunset Ave to 22nd St	3,037	11.9	B	4,252	16.4	B	3,000	11.8	B	4,290	16.7	B
F-57	I-10	22nd St to 8th St	2,987	11.7	B	4,182	16.2	B	2,950	11.6	B	4,220	16.4	B
F-58	I-10	8th St to Hargrave St	2,987	11.7	B	4,182	16.2	B	2,940	11.5	B	4,210	16.3	B
F-59	I-10	Hargrave St to Fields Rd	2,689	10.5	A	3,764	14.5	B	2,640	10.4	A	3,800	14.8	B
F-60	I-10	Fields Rd to Morongo Trail	2,564	10.0	A	3,590	13.9	B	2,510	9.9	A	3,620	14.1	B
F-61	I-10	Morongo Trail to Main St	2,265	8.8	A	3,172	12.3	B	2,220	8.7	A	3,210	12.5	B
F-62	I-10	Main St to Haugen-Lehmann Way	2,265	8.8	A	3,172	12.3	B	2,220	8.7	A	3,210	12.5	B
F-64	I-10	SR-111 to Tipton Rd	1,967	7.7	A	2,753	10.6	A	1,920	7.5	A	2,780	10.8	A
F-65	I-10	Tipton Rd to SR-62	1,967	7.7	A	2,753	10.6	A	1,940	7.6	A	2,780	10.8	A

Indicates that the LOS exceeds the target level

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Table 4.15.AC-2: Existing (2012) Plus Phase 1 Freeway Mainline Levels of Service (Southbound/Westbound Directions)

ID	Freeway	Segment	Existing Conditions						Existing Plus Phase 1 Conditions					
			Southbound / Westbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-2	SR-60	Reservoir St to Ramona Ave	8,762	41.4	E	6,381	25.6	C	8,670	40.9	E	6,490	26.4	D
F-3	SR-60	Ramona Ave to Central Ave	8,283	37.1	E	5,925	23.4	C	8,170	36.5	E	6,040	24.1	C
F-4	SR-60	Central Ave to Mountain Ave	6,336	24.7	C	6,076	24.1	C	6,220	24.3	C	6,200	24.9	C
F-5	SR-60	Mountain Ave to Euclid Ave	6,259	24.4	C	6,495	26.3	D	6,150	24.0	C	6,620	27.1	D
F-6	SR-60	Euclid Ave to Grove Ave	6,461	25.4	C	6,302	25.2	C	6,350	25.0	C	6,430	26.1	D
F-7	SR-60	Grove Ave to Vineyard Ave	6,274	24.3	C	6,699	27.4	D	6,150	23.8	C	6,830	28.3	D
F-8	SR-60	Vineyard Ave to Archibald Ave	7,658	32.1	D	6,245	25.0	C	7,510	31.4	D	6,380	26.0	C
F-9	SR-60	Archibald Ave to Haven Ave	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-10	SR-60	Haven Ave to Milliken Ave	5,804	17.4	B	5,698	17.5	B	5,640	17.0	B	5,850	18.2	C
F-11	SR-60	Milliken Ave to I-15	5,456	20.5	C	5,111	19.5	C	5,240	19.7	C	5,270	20.4	C
F-12	SR-60	I-15 to Etiwanda Ave/Van Buren Blvd	4,490	13.4	B	4,275	13.0	B	4,300	12.9	B	4,460	13.8	B
F-13	SR-60	Etiwanda Ave/Van Buren Blvd to Mission	4,220	15.7	B	3,881	14.8	B	4,010	15.1	B	4,110	15.9	B
F-14	SR-60	Mission Blvd/Country Village Rd to Pedley Rd	4,172	15.5	B	3,963	15.1	B	3,970	14.9	B	4,190	16.2	B
F-15	SR-60	Pedley Rd to Pyrite St	3,216	12.0	B	3,068	11.7	B	3,010	11.4	B	3,280	12.7	B
F-16	SR-60	Pyrite St to Valley Way	2,653	9.9	A	2,567	9.8	A	2,460	9.3	A	2,790	10.9	A
F-17	SR-60	Valley Way to Rubidoux Blvd	4,532	23.1	C	4,725	24.9	C	4,320	22.0	C	4,950	27.0	D
F-18	SR-60	Rubidoux Blvd to Market St	3,568	17.7	B	3,868	19.7	C	3,390	17.1	B	4,120	21.5	C
F-19	SR-60	Market St to Main St	5,631	30.9	D	5,109	27.6	D	5,440	29.8	D	5,350	30.2	D
F-20	SR-60	Main to SR-91	5,248	27.9	D	4,720	24.9	C	5,100	27.2	D	4,920	26.8	D
F-24	SR-60	Martin Luther King Blvd to Central Ave	7,050	30.6	D	5,800	24.1	C	6,910	30.9	D	6,150	28.0	D
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	7,461	31.1	D	6,376	25.6	C	7,280	30.4	D	6,740	28.4	D
F-27	SR-60	I-215 to Day St	7,050	47.9	F	3,093	15.9	B	7,020	49.1	F	3,340	18.0	B
F-29	SR-60	Pigeon Pass Rd to Heacock St	3,013	23.1	C	3,254	26.5	D	2,990	23.7	C	3,550	31.8	D
F-30	SR-60	Heacock St to Perris Blvd	2,638	19.9	C	2,671	20.8	C	2,680	21.0	C	3,040	25.8	C
F-31	SR-60	Perris Blvd to Nason St	1,910	14.3	B	2,045	15.8	B	2,030	15.9	B	2,490	20.5	C
F-32	SR-60	Nason St to Moreno Beach Dr	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	988	7.4	A	1,336	10.3	A	1,270	10.4	A	1,900	16.0	B
F-34	SR-60	Redlands Blvd to Theodore St	1,193	8.9	A	1,498	11.6	B	1,560	12.5	B	2,110	17.3	B
F-35	SR-60	Theodore St to Gilman Springs Rd	1,183	8.9	A	1,393	10.8	A	1,170	9.0	A	1,350	10.6	A
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	837	7.0	A	1,002	9.1	A	970	9.4	A	990	10.0	A
F-37	SR-60	Jack Rabbit Trail to I-10	837	6.3	A	1,002	7.7	A	970	7.4	A	990	7.8	A
F-39	SR-91	I-15 to McKinley St	6,402	25.1	C	5,971	24.1	C	6,310	24.8	C	6,080	24.8	C
F-40	SR-91	McKinley St to Pierce St	4,788	25.0	C	5,183	29.3	D	4,690	24.5	C	5,290	30.4	D
F-41	SR-91	Pierce St to Magnolia Ave	4,629	23.9	C	7,050	53.3	F	4,540	23.5	C	7,150	56.2	F
F-42	SR-91	Magnolia Ave to La Sierra Ave	4,894	25.7	C	7,050	53.3	F	4,800	25.2	C	7,140	55.9	F
F-43	SR-91	La Sierra Ave to Tyler St	4,467	22.9	C	5,167	29.2	D	4,370	22.5	C	5,260	30.2	D
F-44	SR-91	Tyler St to Van Buren Blvd	5,769	22.1	C	6,661	27.8	D	5,690	21.9	C	6,740	28.5	D

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Table 4.15.AC-2: Existing (2012) Plus Phase 1 Freeway Mainline Levels of Service (Southbound/Westbound Directions)

ID	Freeway	Segment	Existing Conditions						Existing Plus Phase 1 Conditions					
			Southbound / Westbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-45	SR-91	Van Buren Blvd to Adam St	5,342	20.2	C	6,401	26.3	D	5,280	20.1	C	6,490	27.0	D
F-46	SR-91	Adam St to Madison St	4,939	18.6	C	5,453	21.5	C	4,890	18.5	C	5,530	22.0	C
F-47	SR-91	Madison St to Arlington Ave	4,218	21.4	C	4,711	25.5	C	4,170	21.3	C	4,780	26.3	D
F-49	SR-91	Central Ave to 14th St	4,737	24.7	C	4,940	27.2	D	4,720	24.7	C	4,990	27.7	D
F-51	SR-91	University Ave to Spruce St	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-66	I-215	Scott Rd to Newport Rd	2,294	17.2	B	2,318	17.2	B	2,280	17.1	B	2,280	17.0	B
F-68	I-215	Newport Rd to McCall Blvd	2,528	19.0	C	3,111	23.7	C	2,530	19.0	C	3,070	23.4	C
F-69	I-215	McCall Blvd to Ethanac Rd	3,069	23.6	C	2,539	18.9	C	3,070	23.6	C	2,510	18.7	C
F-70	I-215	Ethanac Rd to SR-74	2,882	21.9	C	3,854	32.0	D	2,890	22.0	C	3,850	31.9	D
F-71	I-215	SR-74 to Redlands Ave	4,539	44.2	E	3,710	30.1	D	4,570	44.9	E	3,680	29.7	D
F-74	I-215	Columbia Ave to Center St	5,191	27.6	D	4,917	25.4	C	5,260	28.4	D	4,890	25.2	C
F-75	I-215	Center St to La Cadena Dr	5,541	30.4	D	5,235	27.6	D	5,630	31.4	D	5,210	27.4	D
F-76	I-215	La Cadena Dr to Barton Rd	5,414	29.4	D	5,196	27.3	D	5,480	29.9	D	5,170	27.1	D
F-77	I-215	Barton Rd to Mt. Vernon Ave	5,435	29.5	D	5,256	27.7	D	5,500	30.1	D	5,230	27.5	D
F-78	I-215	Mt. Vernon Ave to I-10	5,776	22.0	C	5,606	21.0	C	5,850	22.3	C	5,580	20.9	C
F-80	I-215	Auto Plaza Dr to Mill St	4,022	15.1	B	4,090	15.2	B	4,080	15.4	B	4,040	15.0	B
F-83	I-215	Baseline Rd to Highland Ave	4,537	44.1	E	4,700	46.7	F	4,590	45.3	F	4,650	45.6	F
F-52	I-10	SR-60 to Beaumont Ave	4,288	18.1	C	3,675	13.8	B	4,320	18.3	C	3,710	14.0	B
F-53	I-10	Beaumont Ave to Pennsylvania Ave	4,358	18.4	C	3,736	14.0	B	4,400	18.7	C	3,740	14.1	B
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	4,569	19.4	C	3,916	14.7	B	4,610	19.7	C	3,910	14.7	B
F-55	I-10	Highland Springs Ave to Sunset Ave	4,393	18.6	C	3,766	14.1	B	4,430	18.8	C	3,750	14.1	B
F-56	I-10	Sunset Ave to 22nd St	4,288	18.1	C	3,675	13.8	B	4,330	18.4	C	3,660	13.8	B
F-57	I-10	22nd St to 8th St	4,218	17.8	B	3,615	13.5	B	4,260	18.1	C	3,600	13.5	B
F-58	I-10	8th St to Hargrave St	4,218	17.8	B	3,615	13.5	B	4,250	18.1	C	3,590	13.5	B
F-59	I-10	Hargrave St to Fields Rd	3,796	16.0	B	3,254	12.2	B	3,830	16.3	B	3,220	12.1	B
F-60	I-10	Fields Rd to Morongo Trail	3,620	15.3	B	3,103	11.6	B	3,660	15.5	B	3,070	11.6	B
F-61	I-10	Morongo Trail to Main St	3,198	13.5	B	2,741	10.3	A	3,240	13.8	B	2,710	10.2	A
F-62	I-10	Main St to Haugen-Lehmann Way	3,198	13.5	B	2,741	10.3	A	3,240	13.8	B	2,710	10.2	A
F-64	I-10	SR-111 to Tipton Rd	2,777	11.7	B	2,380	8.9	A	2,810	11.9	B	2,360	8.9	A
F-65	I-10	Tipton Rd to SR-62	2,777	11.7	B	2,380	8.9	A	2,810	11.9	B	2,360	8.9	A

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Freeway Weaving Analysis. Existing (2012) with Phase 1 freeway weaving segment levels of service for the study area are summarized in Table 4.15.AD, which shows that six freeway weaving segments would operate at unsatisfactory levels of service. Phase 1 of the project would contribute toward the worsening of an already unsatisfactory LOS at these six freeway weaving segments and, therefore, would have a cumulative impact at these locations.

Phase 1 of the project would worsen the existing LOS deficiency at the following six freeway weaving segments under existing with Phase 1 conditions:

- Northbound or Eastbound:
 - SR-60 SR-71/S. Garey Avenue to S. Reservoir Road; SR-60 SR-91 to W. Blaine St/3rd Street;
 - SR-60 Blaine Street/3rd Street to University Avenue; and
 - SR-91 Arlington Avenue to Central Avenue.
- Southbound or Westbound:
 - SR-60 Central Avenue to Fair Isle Drive/Box Springs Road; and
 - SR-91 14th Street to University Avenue.

Table 4.15.AD: Existing (2012) Plus Phase 1 Freeway Weaving Segments Levels of Service

ID	Freeway	Weaving Segment	Existing Conditions						Existing Plus Phase 1 Conditions					
			Northbound / Eastbound			Northbound / Eastbound			Northbound / Eastbound			Northbound / Eastbound		
			AM Peak Hour		LOS	PM Peak Hour		LOS	AM Peak Hour		LOS	PM Peak Hour		LOS
Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS			
W-1	SR-60	SR-71/Garey Ave to Reservoir St	5,985	24.0	C	8,616	35.7	E	6,160	25.1	C	8,550	35.5	E
W-9	SR-60	Haven Ave to Archibald Ave	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-20	SR-60	Main St to SR-91	5,418	25.8	C	7,050	33.6	D	5,690	27.7	C	6,970	33.6	D
W-21	SR-60	SR-91 to Blaine St/3 rd St	3,885	14.8	B	9,400	39.0	E	4,280	16.9	B	9,330	39.0	E
W-22	SR-60	Blaine St/3 rd St to University Ave	3,919	18.7	B	7,050	37.4	E	4,260	22.5	C	6,980	38.4	E
W-23	SR-60	University Ave to Martin Luther King	4,528	20.4	C	5,932	25.7	C	4,890	22.9	C	5,830	25.7	C
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs	3,856	14.5	B	7,840	32.4	D	4,330	18.0	B	7,830	33.8	D
W-27	SR-60	I-215 to Day St	2,988	10.6	B	4,704	18.8	B	3,480	14.9	B	4,770	19.8	B
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	2,995	12.8	B	4,749	20.7	C	3,400	15.1	B	4,740	21.1	C
W-32	SR-60	Moreno Beach Dr to Nason St	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-42	SR-91	Magnolia Ave to La Sierra Ave	5,445	24.6	C	5,684	27.4	C	5,560	25.3	C	5,630	27.2	C
W-48	SR-91	Arlington Ave to Central Ave	7,050	35.3	E	4,073	19.6	B	7,150	36.2	E	4,080	19.8	B
W-50	SR-91	14 th St to University Ave	4,643	21.8	C	4,441	21.9	C	4,670	22.1	C	4,450	22.1	C
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-73	I-215	SR-60 to Columbia Ave	6,260	34.4	D	5,548	28.0	C	6,240	34.3	D	5,610	28.5	D
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,400	16.3	B	4,147	14.5	B	4,320	16.1	B	4,200	15.0	B
W-81	I-215	Mill St to 2nd St	5,044	23.0	C	5,095	22.5	C	4,970	22.6	C	5,140	22.7	C
W-82	I-215	5th St to Baseline Rd	3,754	16.5	B	3,590	14.9	B	3,700	16.2	B	3,640	15.2	B
W-63	I-10	Haugen-Lehmann Way to SR-111	2,265	7.5	A	3,172	10.5	B	2,220	7.4	A	3,210	10.7	B

Indicates that the LOS exceeds the target level

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ID	Freeway	Weaving Segment	Existing Conditions						Existing Plus Phase 1 Conditions					
			Southbound / Westbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
W-1	SR-60	SR-71/Garey Ave to Reservoir St	6,125	21.4	C	5,892	20.8	C	6,020	21.1	C	6,000	21.4	C
W-9	SR-60	Haven Ave to Archibald Ave	6,288	23.5	C	6,071	23.5	C	6,130	23.0	C	6,210	24.4	C
W-20	SR-60	Main St to SR-91	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-21	SR-60	SR-91 to Blaine St/3rd St	7,729	28.6	D	7,211	27.2	C	7,520	28.1	D	7,530	29.2	D
W-22	SR-60	Blaine St/3rd St to University Ave	5,714	20.1	C	6,204	23.0	C	5,520	20.2	C	6,550	25.9	C
W-23	SR-60	University Ave to Martin Luther King	5,601	28.0	C	5,876	28.0	C	5,430	27.4	C	6,200	31.0	D
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs	7,050	37.0	E	6,026	29.3	D	6,940	37.7	E	6,300	32.6	D
W-27	SR-60	I-215 to Day St	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	4,700	31.0	D	4,197	27.2	C	4,630	30.2	D	4,520	30.6	D
W-32	SR-60	Moreno Beach Dr to Nason St	1,609	9.2	A	1,753	10.2	B	1,780	10.7	B	2,170	13.5	B
W-42	SR-91	Magnolia Ave to La Sierra Ave	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-48	SR-91	Arlington Ave to Central Ave	4,642	21.1	C	5,118	23.8	C	4,570	20.8	C	5,190	24.4	C
W-50	SR-91	14th St to University Ave	5,179	24.1	C	7,050	35.5	E	5,210	24.4	C	7,070	35.9	E
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	5,075	14.4	B	8,804	26.9	C	5,100	14.6	B	8,820	27.1	C
W-73	I-215	SR-60 to Columbia Ave	5,877	26.4	C	5,495	24.5	C	5,950	26.9	C	5,460	24.4	C
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,890	16.8	B	4,591	16.3	B	4,940	17.0	B	4,530	16.2	B
W-81	I-215	Mill St to 2nd St	4,442	19.6	B	4,380	19.4	B	4,500	19.9	B	4,330	19.1	B
W-82	I-215	5th St to Baseline Rd	3,607	15.6	B	3,481	15.1	B	3,660	15.9	B	3,440	14.9	B
W-63	I-10	Haugen-Lehmann Way to SR-111	3,198	11.8	B	2,741	10.3	B	3,240	12.0	B	2,710	10.1	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Freeway Ramp Analysis. Existing (2012) with Phase 1 freeway ramp levels of service for the study area are summarized in Table 4.15.AE, which shows the SR-60 eastbound on-ramp from Central Avenue currently operates at LOS F in the p.m. peak hour and would also operate at LOS F under Existing Plus Phase 1 conditions, but with a higher traffic density. This would be considered a significant cumulative impact.

4.15.6.2 Year 2017 With Project Conditions Traffic and Level of Service Impacts

Note: This scenario was evaluated in the original Draft EIR but project phasing has changed since that time, so it is not included in this version of the Draft EIR. The reader is referred to the original Draft EIR to review this previous analysis.

The following analysis was added in response to comments based on revisions to the project Traffic Impact Assessment (TIA) and the phasing of the proposed WLC Specific Plan. It has been prepared to address issues raised by other CEQA court cases that required an EIR to show the traffic impacts of developing the entire proposed project at the time of baseline or existing conditions. The following provides that analysis.

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Table 4.15.AE: Existing (2012) Plus Phase 1 Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp Segment	Ramp No. of Lanes	Existing Conditions						Existing Plus Phase 1 Conditions									
				AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour						
				Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS
R-1	SR-60 EB	On-Ramp from Martin Luther King Blvd	1	4,110	242	16.9	B	5,678	906	26.5	C	4,460	290	19.1	B	5,560	1,290	29.6	D
R-2	SR-60 EB	On-Ramp from Central Ave	1	5,796	349	18.5	B	8,868	904	31.8	F	6,190	440	21.1	C	8,740	930	32.0	F
R-3	SR-60 EB	Off-Ramp to Redlands Blvd	1	1,326	119	3.3	A	1,397	30	3.2	A	1,930	350	10.8	B	1,660	440	6.9	A
R-4	SR-60 EB	Loop On-Ramp from Redlands Blvd	1	1,207	26	12.9	B	1,367	25	13.6	B	1,580	80	17.9	B	1,220	90	13.9	B
R-5	SR-60 EB	Direct On-Ramp from Redlands Blvd	0	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			
R-6	SR-60 EB	Off-Ramp to Theodore St	1	1,614	207	17.3	B	1,920	434	19.1	B	2,310	940	16.1	B	2,260	580	14.8	B
R-7	SR-60 EB	Loop On-Ramp from Theodore St	1	1,407	70	16.5	B	1,486	71	16.5	B	1,370	10	16.7	B	1,680	20	18.6	B
R-8	SR-60 EB	Direct On-Ramp from Theodore St	1	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			
R-9	SR-60 EB	Off-Ramp to Gilman Springs Rd	1	1,521	330	16.4	B	1,915	385	19.0	B	1,480	380	16.1	B	1,900	410	19.2	B
R-10	SR-60 EB	On-Ramp from Gilman Springs Rd	1	1,191	7	14.2	B	1,530	8	16.3	B	1,100	20	13.6	B	1,490	37	16.4	B
R-11	SR-60 WB	Off-Ramp to Gilman Springs Rd	1	837	11	9.6	A	1,002	9	11.3	B	970	59	11.0	B	990	21	11.4	B
R-12	SR-60 WB	On-Ramp from Gilman Springs Rd	1	826	357	13.5	B	993	306	14.6	B	911	384	14.7	B	969	397	15.6	B
R-13	SR-60 WB	Off-Ramp to Theodore St	1	1,183	24	12.7	B	1,393	26	14.9	B	1,170	190	7.4	A	1,350	70	8.7	A
R-14	SR-60 WB	On-Ramp from Theodore St	1	1,159	34	12.1	B	1,367	131	14.8	B	980	560	15.9	B	1,280	800	20.7	C
R-15	SR-60 WB	Off-Ramp to Redlands Blvd	1	1,193	49	12.8	B	1,498	38	15.9	B	1,580	90	17.1	B	2,110	50	22.8	C
R-16	SR-60 WB	Loop On-Ramp from Redlands Blvd	1	1,144	329	14.3	B	1,460	361	17.4	B	1,470	340	18.0	B	2,060	550	25.3	C
R-17	SR-60 WB	Direct On-Ramp from Redlands Blvd	0	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			
R-18	SR-60 WB	Off-Ramp to Central Ave	2	7,050	384	32.6	D	6,026	439	28.5	D	6,940	390	32.6	D	6,300	440	30.4	D
R-19	SR-60 WB	Off-Ramp to Martin Luther King Blvd	1	7,050	474	21.0	C	5,800	337	15.9	B	6,910	490	20.9	C	6,150	350	17.9	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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4.15.6.2 Existing (2012) With Project (Buildout) Conditions Traffic and Level of Service

Threshold:	<p>Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit.</p> <p>A significant project-specific traffic impact would occur if the project would cause a decrease from satisfactory LOS (based on local agency adopted standards) to an unsatisfactory LOS on a study area intersection, roadway segment, freeway mainline lane, freeway weaving segment or freeway ramp. A significant cumulative traffic impact would occur if the project contributes traffic toward those facilities operating at unsatisfactory LOS in the pre-project condition. The adopted LOS standards are as follows:</p> <ul style="list-style-type: none">• Roadway segments: LOS C and LOS D as outlined in previously referenced Tables 4.15.B and 4.15.C.• Intersections: LOS C and LOS D as outlined in previously referenced Table 4.15.Z.• Freeway mainline: LOS D.• Freeway Ramp Merge/Diverge: LOS D.
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Impacts

Intersection Analysis. Existing baseline (2012) with project buildout intersection levels of service for the study area intersections are summarized in Table 4.15.AF-1 and 4.15.AF-2, which shows there are 17 study intersections where the project would contribute to a significant impact and mitigation is required. Twelve of these intersections already exceed the threshold of significance under existing conditions and would therefore be considered cumulative impacts. The project would cause a direct project impact at another five intersections.

The project would worsen the existing LOS deficiency at the following 12 intersections under existing with project conditions:

- Redlands Boulevard/Locust Avenue;
- Redlands Boulevard/SR-60 Westbound Ramps;
- Oliver Street/Alessandro Boulevard;
- Moreno Beach Drive/SR-60 Eastbound Ramps;
- Lasselle Street/Cactus Avenue;
- Alessandro Boulevard/Chicago Avenue;
- Gilman Springs Road/Bridge Street;
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road;
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road;
- San Timoteo Canyon Road/Alessandro Road;
- San Timoteo Canyon Road/Live Oak Canyon Road; and
- Redlands Boulevard/San Timoteo Canyon Road.

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Table 4.15.AF-1: Existing (2012) plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
1	Theodore St/Street F	D	N/A	Non-Existent		RABT	26.3	C
2	Cactus Ave Extension/Street E	D	N/A	Non-Existent		SIGNAL	10.3	B
3	Theodore St/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	9.7	A	RABT	11.3	B
4	Alessandro Blvd (Street C)/Street F	D	N/A	Non-Existent		RABT	7.2	A
6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	CSS	10.3	B	SIGNAL	17.9	B
9	Gilman Springs Rd/ Eucalyptus Ave	D	N/A	Non-Existent		SIGNAL	6.4	A
10	Redlands Blvd/Locust Ave	C	CSS	26.7	D	CSS	92.2	F
11	Redlands Blvd/Ironwood Ave	D	SIGNAL	40.9	D	SIGNAL	36.0	D
12	Theodore Street/Ironwood Avenue	D	CSS	9.7	A	CSS	16.4	C
13	Redlands Blvd/SR-60 WB ramps	D	CSS	42.2	E	CSS	48.0	E
14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	9.6	A	SIGNAL	18.0	B
15	Theodore Str/SR-60 WB ramps	D	CSS	9.0	A	SIGNAL	15.2	B
16	Theodore Str/SR-60 EB ramps	D	CSS	9.2	A	SIGNAL	2.3	A
17	Quincy Str/Fir Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
18	Redlands Blvd/Eucalyptus Ave (Fir)	D	N/A	Non-Existent		SIGNAL	18.3	B
19	Theodore St/Fir Ave (Eucalyptus)	D	CSS	9.2	A	SIGNAL	14.7	B
20	Oliver Str/Alessandro Blvd	C	CSS	25.9	D	CSS	69.7	F
21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	24.0	C	SIGNAL	30.0	C
22	Quincy Str/Alessandro Blvd	N/A	N/A	Non-Existent		N/A	Non-Existent	
23	Redlands Blvd/Alessandro Blvd	C	AWS	20.5	C	AWS	21.7	C
24	Oliver Str/Cactus Ave	D	SIGNAL	23.8	C	SIGNAL	28.2	C
25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	16.0	B	SIGNAL	18.2	B
26	Quincy Str/Cactus Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
27	Redlands Blvd/Cactus Ave	C	AWS	11.4	B	AWS	106.3	F
28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	16.2	B	SIGNAL	22.1	C
29	Heacock Str/Ironwood Ave	D	SIGNAL	29.6	C	SIGNAL	29.9	C
30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	22.6	C	SIGNAL	23.8	C
31	Heacock St/SR-60 EB Ramps	D	SIGNAL	12.5	B	SIGNAL	13.9	B
32	Sunnymead Blvd & Perris Blvd	D	SIGNAL	29.4	C	SIGNAL	30.7	C
33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	22.0	C	SIGNAL	25.1	C

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Table 4.15.AF-1: Existing (2012) plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	22.8	C	SIGNAL	23.7	C
35	Moreno Beach Dr/Locust Ave	C	CSS	8.6	A	CSS	8.9	A
36	Moreno Beach Drive & Ironwood Avenue	D	SIGNAL	50.3	D	SIGNAL	55.8	E
37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	38.0	D	SIGNAL	46.0	D
38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	37.0	D	SIGNAL	37.8	D
39	Iris Ave/Perris Blvd	D	SIGNAL	41.5	D	SIGNAL	45.3	D
40	Kitching St/Iris Ave	C	SIGNAL	23.4	C	SIGNAL	25.1	C
41	Lasselle Str/Iris Ave	D	SIGNAL	25.4	C	SIGNAL	30.9	C
42	Nason Str/Iris Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
43	Oliver Str/Iris Ave	D	SIGNAL	22.1	C	SIGNAL	25.7	C
44	Via Dell Lago/Iris Ave	C	SIGNAL	6.7	A	SIGNAL	8.7	A
45	Krameria Ave/Perris Blvd	D	SIGNAL	34.6	C	SIGNAL	36.0	D
46	Kitching Str/Krameria Ave	D	SIGNAL	21.7	C	SIGNAL	48.5	D
47	Lasselle Str/Krameria Ave	D	SIGNAL	37.9	D	SIGNAL	42.8	D
48	Kitching Str/Alessandro Blvd	D	SIGNAL	28.8	C	SIGNAL	29.7	C
49	Lasselle Str/Alessandro Blvd	D	SIGNAL	31.7	C	SIGNAL	32.4	C
50	Morrison Str/Alessandro Blvd	D	SIGNAL	8.8	A	SIGNAL	8.7	A
51	Nason Str/Alessandro Blvd	D	SIGNAL	20.5	C	SIGNAL	21.4	C
52	Kitching Str/Cactus Ave	C	SIGNAL	33.3	C	SIGNAL	34.2	C
53	Lasselle Str/Cactus Ave	C	SIGNAL	47.2	D	SIGNAL	49.2	D
54	Morrison Str/Cactus Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
55	Nason Str/Cactus Ave	D	SIGNAL	22.5	C	SIGNAL	22.4	C
56	Frederick Str/Alessandro Blvd	D	SIGNAL	19.5	B	SIGNAL	19.5	B
57	Graham Str/Alessandro Blvd	D	SIGNAL	19.8	B	SIGNAL	20.2	C
58	Heacock Str/Alessandro Blvd	D	SIGNAL	25.8	C	SIGNAL	26.5	C
59	Indian Str/Alessandro Blvd	D	SIGNAL	17.6	B	SIGNAL	19.2	B
60	Perris Blvd/Alessandro Blvd	D	SIGNAL	32.4	C	SIGNAL	33.9	C
61	Frederick Str/Cactus Ave	D	SIGNAL	9.8	A	SIGNAL	10.3	B
62	Graham Str/Cactus Ave	D	SIGNAL	12.9	B	SIGNAL	13.6	B
63	Heacock Str/Cactus Ave	D	SIGNAL	30.1	C	SIGNAL	30.8	C

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Table 4.15.AF-1: Existing (2012) plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
64	Indian Str/Cactus Ave	C	SIGNAL	24.4	C	SIGNAL	25.4	C
65	Perris Blvd/Cactus Ave	D	SIGNAL	26.9	C	SIGNAL	26.6	C
66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	25.8	C	SIGNAL	25.9	C
67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	6.4	A	SIGNAL	6.7	A
68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	19.4	B	SIGNAL	19.7	B
69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	18.2	B	SIGNAL	18.2	B
70	Day Str/Alessandro Blvd	D	SIGNAL	4.6	A	SIGNAL	6.1	A
71	Eisworth Str/Alessandro Blvd	D	SIGNAL	19.2	B	SIGNAL	19.5	B
72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	12.1	B	SIGNAL	18.8	B
73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	11.1	B	SIGNAL	10.2	B
74	Eisworth Str/Cactus Ave	D	SIGNAL	26.7	C	SIGNAL	30.5	C
75	Central Ave/Lochmoor Dr.	D	SIGNAL	10.9	B	SIGNAL	11.6	B
76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	22.2	C	SIGNAL	24.3	C
77	SR-60 EB Ramps/Central Ave	D	SIGNAL	7.3	A	SIGNAL	8.3	A
78	SR-60 WB Ramps/Central Ave	D	SIGNAL	6.8	A	SIGNAL	7.3	A
79	Alessandro Blvd/Trautwein Rd.	D	SIGNAL	28.4	C	SIGNAL	29.1	C
80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	18.8	B	SIGNAL	20.8	C
81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	43.2	D	SIGNAL	43.6	D
82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	9.0	A	SIGNAL	9.2	A
83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	43.2	D	SIGNAL	47.5	D
84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	8.6	A	SIGNAL	8.9	A
85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	24.3	C	AWS	27.4	D
86	Central Ave/Chicago Ave	D	SIGNAL	23.4	C	SIGNAL	25.0	C
87	Central Ave/EI Cerrito Dr	D	SIGNAL	11.7	B	SIGNAL	12.8	B
88	Central Ave/Canyon Crest Dr	D	SIGNAL	27.8	C	SIGNAL	28.9	C
89	Chicago Ave/Country Club Dr	D	SIGNAL	6.3	A	SIGNAL	6.8	A
90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	31.3	C	SIGNAL	31.9	C
91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	21.0	C	SIGNAL	21.1	C
92	Arlington Ave/Maude St	D	SIGNAL	13.8	B	SIGNAL	14.1	B
93	Horace Str/Arlington Ave	D	SIGNAL	12.3	B	SIGNAL	13.0	B

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Table 4.15.AF-1: Existing (2012) plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project		2012 With Project			
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
94	Arlington Ave/Victoria Ave	D	SIGNAL	54.8	D	SIGNAL	56.2	E
95	Alessandro Blvd/Chicago Ave	D	SIGNAL	40.7	D	SIGNAL	45.0	D
96	Alessandro Blvd/Century Ave	D	SIGNAL	16.7	B	SIGNAL	17.8	B
97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	30.7	C	SIGNAL	30.5	C
98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	20.4	C	SIGNAL	25.2	C
99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	15.4	B	SIGNAL	16.6	B
100	Harley Knox Blvd/Evan Rd	N/A	N/A	Non-Existent		N/A	Non-Existent	
101	Ramona Expy/Indian St	E	SIGNAL	3.9	A	SIGNAL	5.0	A
102	Ramona Expy/Perris Blvd	E	SIGNAL	31.7	C	SIGNAL	33.1	C
103	Ramona Expy/Evans Rd	E	SIGNAL	54.5	D	SIGNAL	63.5	E
104	Perris Blvd/Morgan St	D	SIGNAL	11.9	B	SIGNAL	13.4	B
105	Evans Rd/Morgan St	C	SIGNAL	32.5	C	SIGNAL	32.5	C
106	Perris Blvd/Rider St	C	SIGNAL	24.5	C	SIGNAL	24.3	C
107	Evans Rd/Rider St	C	SIGNAL	34.2	C	SIGNAL	34.2	C
108	Perris Blvd/Mid-County Pkwy WB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
109	Perris Blvd/Mid-County Pkwy EB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
110	Evans Rd/Mid-County Pkwy WB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
111	Evans Rd/Mid-County Pkwy EB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
112	Placentia Ave/Perris Blvd	D	SIGNAL	30.1	C	SIGNAL	29.6	C
113	Evans Rd/Placentia Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
114	Evans Rd/Orange Ave	C	AWS	12.5	B	AWS	13.6	B
115	Evans Rd/Nuevo Rd	C	SIGNAL	23.3	C	SIGNAL	23.5	C
116	Evans Rd/Ellis Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
117	Ellis Ave/I-215 SB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
118	Ellis Ave/SR-215 NB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
119	Evans Rd/San Jacinto Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
120	Park Center Blvd/Ramona Expy WB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
121	Park Center Blvd/Ramona Expy EB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
122	Bridge St/Ramona Expy	C	CSS	22.4	C	CSS	29.5	D
123	Gilman Springs Rd/Bridge Str	C	CSS	26.6	D	CSS	49.6	E

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Table 4.15.AF-1: Existing (2012) plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	34.7	D	CSS	65.5	F
125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	29.2	D	CSS	40.6	E
126	Ramona Expy/Sanderson Ave	D	SIGNAL	27.1	C	SIGNAL	28.6	C
127	Potrero Blvd/SR-60 WB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
128	Potrero Blvd/SR-60 EB Ramps	N/A	N/A	Non-Existent		N/A	Non-Existent	
129	W 6th St/California Ave	C	AWS	13.5	B	AWS	20.9	C
130	W 6th St/Beaumont Ave	C	SIGNAL	13.2	B	SIGNAL	12.7	B
131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	9.4	A	SIGNAL	21.2	C
132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	77.2	F	AWS	> 180.0	F
133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	50.9	F	AWS	135.6	F
134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	81.8	F	AWS	174.1	F
135	W Crescent Ave/Alessandro Rd	C	CSS	14.0	B	CSS	18.5	C
136	W Sunset Dr/Alessandro Rd	C	AWS	8.9	A	AWS	10.1	B

denotes LOS exceeding the target threshold

Notes: "CSS" means cross-street is stop-controlled

"AWS" means all-way stop

"LT" and "RT" denote left turn and right turn respectively

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

"NB" and "SB" denote northbound and southbound respectively

"EB" and "WB" denote eastbound and westbound respectively

"RABT" means roundabout

Table 4.15.AF-2: Existing (2012) plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
1	Theodore St/Street F	D	N/A	Non-Existent		RABT	53.5	D
2	Cactus Ave Extension/Street E	D	N/A	Non-Existent		SIGNAL	14.2	B
3	Theodore St/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	10.1	B	RABT	11.0	B
4	Street C/Street F	D	N/A	Non-Existent		RABT	6.9	A
6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	CSS	15.7	C	SIGNAL	28.4	C
9	Gilman Springs Rd/ Eucalyptus Ave	D	N/A	Non-Existent		SIGNAL	6.3	A
10	Redlands Blvd/Locust Ave	C	CSS	42.8	E	CSS	> 180.0	F
11	Redlands Blvd/Ironwood Ave	D	SIGNAL	37.3	D	SIGNAL	34.8	C

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Table 4.15.AF-2: Existing (2012) plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
12	Theodore Street/Ironwood Avenue	D	CSS	9.8	A	CSS	28.7	D
13	Redlands Blvd/SR-60 WB ramps	D	CSS	54.0	F	CSS	> 180.0	F
14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	14.4	B	SIGNAL	49.0	D
15	Theodore Str/SR-60 WB ramps	D	CSS	9.6	A	SIGNAL	13.0	B
16	Theodore Str/SR-60 EB ramps	D	CSS	9.4	A	SIGNAL	1.4	A
17	Quincy Str/Fir Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
18	Redlands Blvd/Eucalyptus Ave (Fir)	D	N/A	Non-Existent	Non-Existent	SIGNAL	14.4	B
19	Theodore St/Fir Ave (Eucalyptus)	D	CSS	9.8	A	SIGNAL	18.5	B
20	Oliver Str/Alessandro Blvd	C	CSS	14.7	B	CSS	20.2	C
21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	28.2	C	SIGNAL	41.6	D
22	Quincy Str/Alessandro Blvd	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
23	Redlands Blvd/Alessandro Blvd	C	AWS	13.8	B	AWS	19.3	C
24	Oliver Str/Cactus Ave	D	SIGNAL	17.3	B	SIGNAL	18.3	B
25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	17.0	B	SIGNAL	19.5	B
26	Quincy Str/Cactus Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
27	Redlands Blvd/Cactus Ave	C	AWS	8.2	A	AWS	102.7	F
28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	13.8	B	SIGNAL	105.1	F
29	Heacock Str/Ironwood Ave	D	SIGNAL	31.9	C	SIGNAL	32.3	C
30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	21.5	C	SIGNAL	22.1	C
31	Heacock St/SR-60 EB Ramps	D	SIGNAL	15.9	B	SIGNAL	16.2	B
32	Sunnymead Blvd & Perris Blvd	D	SIGNAL	36.0	D	SIGNAL	36.3	D
33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	19.7	B	SIGNAL	22.3	C
34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	23.4	C	SIGNAL	23.8	C
35	Moreno Beach Dr/Locust Ave	C	CSS	8.6	A	CSS	9.1	A
36	Moreno Beach Drive & Ironwood Avenue	D	SIGNAL	40.0	D	SIGNAL	43.8	D
37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	76.6	E	SIGNAL	98.8	F
38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	31.2	C	SIGNAL	32.3	C
39	Iris Ave/Perris Blvd	D	SIGNAL	36.5	D	SIGNAL	37.1	D
40	Kitching St/Iris Ave	C	SIGNAL	17.5	B	SIGNAL	27.9	C
41	Lasselle Str/Iris Ave	D	SIGNAL	26.6	C	SIGNAL	31.3	C

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Table 4.15.AF-2: Existing (2012) plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
42	Nason Str/Iris Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
43	Oliver Str/Iris Ave	D	SIGNAL	15.8	B	SIGNAL	18.1	B
44	Via Dell Lago/Iris Ave	C	SIGNAL	6.5	A	SIGNAL	7.3	A
45	Krameria Ave/Perris Blvd	D	SIGNAL	29.3	C	SIGNAL	35.4	D
46	Kitching Str/Krameria Ave	D	SIGNAL	19.4	B	SIGNAL	22.5	C
47	Lasselle Str/Krameria Ave	D	SIGNAL	13.5	B	SIGNAL	13.7	B
48	Kitching Str/Alessandro Blvd	D	SIGNAL	24.7	C	SIGNAL	25.6	C
49	Lasselle Str/Alessandro Blvd	D	SIGNAL	26.6	C	SIGNAL	29.5	C
50	Morrison Str/Alessandro Blvd	D	SIGNAL	7.8	A	SIGNAL	8.2	A
51	Nason Str/Alessandro Blvd	D	SIGNAL	16.9	B	SIGNAL	18.7	B
52	Kitching Str/Cactus Ave	C	SIGNAL	22.6	C	SIGNAL	22.4	C
53	Lasselle Str/Cactus Ave	C	SIGNAL	38.6	D	SIGNAL	38.5	D
54	Morrison Str/Cactus Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
55	Nason Str/Cactus Ave	D	SIGNAL	21.0	C	SIGNAL	22.7	C
56	Frederick Str/Alessandro Blvd	D	SIGNAL	25.6	C	SIGNAL	25.9	C
57	Graham Str/Alessandro Blvd	D	SIGNAL	24.2	C	SIGNAL	26.2	C
58	Heacock Str/Alessandro Blvd	D	SIGNAL	23.6	C	SIGNAL	23.8	C
59	Indian Str/Alessandro Blvd	D	SIGNAL	27.9	C	SIGNAL	28.2	C
60	Perris Blvd/Alessandro Blvd	D	SIGNAL	42.3	D	SIGNAL	45.9	D
61	Frederick Str/Cactus Ave	D	SIGNAL	11.7	B	SIGNAL	13.7	B
62	Graham Str/Cactus Ave	D	SIGNAL	17.4	B	SIGNAL	18.3	B
63	Heacock Str/Cactus Ave	D	SIGNAL	20.3	C	SIGNAL	22.5	C
64	Indian Str/Cactus Ave	C	SIGNAL	19.6	B	SIGNAL	19.6	B
65	Perris Blvd/Cactus Ave	D	SIGNAL	30.7	C	SIGNAL	30.7	C
66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	18.0	B	SIGNAL	18.2	B
67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	12.6	B	SIGNAL	12.6	B
68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	24.1	C	SIGNAL	25.2	C
69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	18.6	B	SIGNAL	21.2	C
70	Day Str/Alessandro Blvd	D	SIGNAL	8.2	A	SIGNAL	10.3	B
71	Eisworth Str/Alessandro Blvd	D	SIGNAL	27.6	C	SIGNAL	29.3	C

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Table 4.15.AF-2: Existing (2012) plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	19.7	B	SIGNAL	39.0	D
73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	3.7	A	SIGNAL	4.2	A
74	Elsworth Str/Cactus Ave	D	SIGNAL	29.5	C	SIGNAL	29.6	C
75	Central Ave/Lochmoor Dr.	D	SIGNAL	6.7	A	SIGNAL	7.9	A
76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	17.6	B	SIGNAL	19.0	B
77	SR-60 EB Ramps/Central Ave	D	SIGNAL	10.3	B	SIGNAL	10.9	B
78	SR-60 WB Ramps/Central Ave	D	SIGNAL	8.2	A	SIGNAL	8.3	A
79	Alessandro Blvd/Trautwein Rd.	D	SIGNAL	14.8	B	SIGNAL	14.7	B
80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	34.9	C	SIGNAL	40.5	D
81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	36.5	D	SIGNAL	38.7	D
82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	13.0	B	SIGNAL	13.5	B
83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	28.0	C	SIGNAL	29.2	C
84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	4.7	A	SIGNAL	5.6	A
85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	12.2	B	AWS	13.4	B
86	Central Ave/Chicago Ave	D	SIGNAL	23.1	C	SIGNAL	27.5	C
87	Central Ave/EI Cerrito Dr	D	SIGNAL	12.0	B	SIGNAL	12.6	B
88	Central Ave/Canyon Crest Dr	D	SIGNAL	35.2	D	SIGNAL	36.7	D
89	Chicago Ave/Country Club Dr	D	SIGNAL	4.9	A	SIGNAL	4.9	A
90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	30.7	C	SIGNAL	30.8	C
91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	20.8	C	SIGNAL	20.9	C
92	Arlington Ave/Maude St	D	SIGNAL	11.1	B	SIGNAL	11.6	B
93	Horace St/Arlington Ave	D	SIGNAL	7.2	A	SIGNAL	7.6	A
94	Arlington Ave/Victoria Ave	D	SIGNAL	30.9	C	SIGNAL	33.2	C
95	Alessandro Blvd/Chicago Ave	D	SIGNAL	65.9	E	SIGNAL	70.0	E
96	Alessandro Blvd/Century Ave	D	SIGNAL	7.6	A	SIGNAL	8.7	A
97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	18.9	B	SIGNAL	18.6	B
98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	17.9	B	SIGNAL	17.7	B
99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	15.1	B	SIGNAL	15.4	B
100	Harley Knox Blvd/Evan Rd	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
101	Ramona Expy/Indian St	E	SIGNAL	7.8	A	SIGNAL	12.5	B

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Table 4.15.AF-2: Existing (2012) plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
102	Ramona Expy/Perris Blvd	E	SIGNAL	34.6	C	SIGNAL	35.0	D
103	Ramona Expy/Evans Rd	E	SIGNAL	28.8	C	SIGNAL	28.8	C
104	Perris Blvd/Morgan St	D	SIGNAL	6.7	A	SIGNAL	8.6	A
105	Evans Rd/Morgan St	C	SIGNAL	20.6	C	SIGNAL	20.2	C
106	Perris Blvd/Rider St	C	SIGNAL	23.0	C	SIGNAL	26.5	C
107	Evans Rd/Rider St	C	SIGNAL	28.3	C	SIGNAL	27.6	C
108	Perris Blvd/Mid-County Pkwy WB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
109	Perris Blvd/Mid-County Pkwy EB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
110	Evans Rd/Mid-County Pkwy WB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
111	Evans Rd/Mid-County Pkwy EB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
112	Placentia Ave/Perris Blvd	D	SIGNAL	14.0	B	SIGNAL	14.9	B
113	Evans Rd/Placentia Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
114	Evans Rd/Orange Ave	C	AWS	10.1	B	AWS	10.7	B
115	Evans Rd/Nuevo Rd	C	SIGNAL	22.6	C	SIGNAL	22.6	C
116	Evans Rd/Ellis Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
117	Ellis Ave/I-215 SB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
118	Ellis Ave/SR-215 NB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
119	Evans Rd/San Jacinto Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
120	Park Center Blvd/Ramona Expy WB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
121	Park Center Blvd/Ramona Expy EB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
122	Bridge St/Ramona Expy	C	CSS	20.6	C	CSS	27.3	D
123	Gilman Springs Rd/Bridge Str	C	CSS	20.8	C	CSS	25.1	D
124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	30.7	D	CSS	48.8	E
125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	48.2	E	CSS	70.4	F
126	Ramona Expy/Sanderson Ave	D	SIGNAL	20.8	C	SIGNAL	21.1	C
127	Potrero Blvd/SR-60 WB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
128	Potrero Blvd/SR-60 EB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
129	W 6th St/California Ave	C	AWS	18.0	C	AWS	20.9	C
130	W 6th St/Beaumont Ave	C	SIGNAL	12.8	B	SIGNAL	11.9	B
131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	5.6	A	SIGNAL	6.4	A

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Table 4.15.AF-2: Existing (2012) plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2012 No Project			2012 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	23.9	C	AWS	98.1	F
133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	60.2	F	AWS	> 180.0	F
134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	80.5	F	AWS	> 180.0	F
135	W Crescent Ave/Alessandro Rd	C	CSS	11.5	B	CSS	14.6	B
136	W Sunset Dr/Alessandro Rd	C	AWS	9.0	A	AWS	10.1	B

denotes LOS exceeding the target threshold

Notes: "CSS" means cross-street is stop-controlled

"AWS" means all-way stop

"RABT" means roundabout

"NB" and "SB" denote northbound and southbound respectively

"EB" and "WB" denote eastbound and westbound respectively

"LT" and "RT" denote left turn and right turn respectively

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

A project-specific significant impact would occur at the following 5 intersections under existing with project conditions:

- Redlands Boulevard/Cactus Avenue;
- Moreno Beach Drive/John Kennedy Drive;
- Moreno Beach Drive/Ironwood Avenue;
- Arlington Avenue/Victoria Avenue; and
- Bridge Street/Ramona Expressway.

Roadway Analysis. Existing baseline (year 2012) with project roadway segment levels of service for the study area are summarized in Table 4.15.AG, which shows three roadway segments would operate at unsatisfactory levels of service. The project would contribute toward the worsening of an already unsatisfactory LOS at two roadway segments and, therefore, have a significant cumulative impact at these locations and mitigation is required. At one roadway segment, the project would create a significant impact since the project would decrease the LOS from satisfactory to unsatisfactory conditions and mitigation is required.

The project would worsen the existing LOS deficiency at the following two roadway segments under existing with project conditions:

- Gilman Springs Road between Alessandro Boulevard and Bridge Street; and
- Gilman Springs Road between SR-60 and Alessandro Boulevard.

A project-specific significant impact would occur at the following roadway segment under existing with project conditions:

- Cactus Avenue Redlands Boulevard to Street D.

Freeway Segment Analysis. Existing (2012) with project freeway segment levels of service for the study area are summarized in Table 4.15.AH, which shows 10 freeway segments would operate at unsatisfactory levels of service. The project would contribute toward the worsening of an already unsatisfactory LOS at eight locations and, therefore, have a cumulative impact at these locations. At two freeway segments, the project would create a significant impact since the project would decrease the LOS from satisfactory to unsatisfactory.

The project would worsen the existing LOS deficiency at the following eight freeway segments under existing with project conditions:

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Table 4.15.AG: Existing (2012) plus Project Roadway Segment Levels of Service

Roadway	From	To	LOS Standard*	Existing Conditions			Existing Plus Build-out Conditions			Project Significant Impact?	Mitigation Measures Required to Reduce Project Impacts to Less-Than-Significant	LOS After Mitigation
				Roadway Section**	Daily Volume	LOS	Roadway Section*	Daily Volume	LOS			
S-1 Theodore Street (A)	SR-60 WB Ramps	Ironwood Avenue	D	2U	771	A	2U	4,017	A			
S-2 Theodore Street (A)	SR-60 EB Ramps	Fir (Eucalyptus) Ave.	D	2U	2,046	A	6D	35,138	B			
S-3 Fir (Eucalyptus) Ave.	Redlands Blvd	Theodore Street (A)	D	2U***	1,339	A	4D	3,136	A			
S-4 Eucalyptus Ave (B)	Theodore Street (A)	Gilman Springs Rd	N/A		Future Road		4D	2,413	A			
S-5 Theodore Street (A)	Fir (Eucalyptus) Ave.	Street E	D	2U	641	A	6D	36,806	B			
S-6 Street E	Theodore Street (A)	Cactus Ave Extension	D		Future Road		4U	13,319	A			
S-7 Street F	Theodore Street (A)	Alessandro Blvd (Street C)	D		Future Road		2U	4,587	A			
S-8 Theodore Street (A)	Fir (Eucalyptus) Ave.	Alessandro Blvd (Street C)	D	2U	641	A	4D	16,641	A			
S-9 Alessandro Blvd (Street E)	Merwin Street	Theodore Street (A)	D	2U	2,537	A	4U	10,660	A			
S-10 Cactus Ave Extension	Alessandro Blvd (Street E)	Cactus Ave.	D		Future Road		4U	14,426	A			
S-11 Alessandro Blvd (Street C)	Theodore Street (A)	Street F	D	2U	1,896	A	4U	15,216	B			
S-13 Alessandro Blvd (Street C)	Street F	Gilman Springs Rd	D	2U	1,896	A	4U	10,395	A			
S-14 Alessandro Blvd	Moreno Beach Drive	Redlands Blvd	D	2U	3,877	A	2U	4,242	A			
S-16 Gilman Springs Rd	Alessandro Blvd (Street C)	Bridge Street	D	2U	14,407	F	2U	15,180	F	Yes	Widen to 4 lanes	
S-17 Gilman Springs Rd	SR-60	Alessandro Blvd (Street C)	D	2U	11,973	E	2U	14,125	F	Yes	Widen to 4 lanes	
S-18 Redlands Blvd	SR-60 EB Ramps	Fir (Eucalyptus) Ave.	D	2U	7,338	A	2U	10,407	D			
S-19 Redlands Blvd	Fir (Eucalyptus) Ave.	Alessandro Blvd	C	2U	6,786	A	2U	4,037	A			
S-20 Alessandro Blvd	Redlands Blvd	Merwin Street	C	2U	2,537	A	2U	565	A			
S-21 Redlands Blvd	Alessandro Blvd	Cactus Ave.	C	2U	6,786	A	2U	3,210	A			
S-22 Cactus Ave.	Redlands Blvd	Cactus Ave Extension	C	2U***	472	A	2U	14,381	E	Yes	Widen to 4 lanes	

* LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways.

** Section is the number of lanes, with "U" for "undivided" and "D" for "divided" roadways.

*** Road currently has 2 lanes in one direction and 1 lane in the other. The capacity shown is based on the narrower direction.

█ Indicates LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.AH-1: Existing (2012) plus Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Existing Conditions						Existing Plus Build-out Conditions					
			Northbound / Eastbound						Northbound / Eastbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-2	SR-60	Reservoir St to Ramona Ave	6,024	24.5	C	7,822	33.0	D	6,340	26.7	D	7,720	32.8	D
F-3	SR-60	Ramona Ave to Central Ave	5,687	22.8	C	9,400	47.3	F	6,020	24.9	C	9,280	46.9	F
F-4	SR-60	Central Ave to Mountain Ave	6,339	26.2	D	9,338	46.6	F	6,690	28.7	D	9,230	46.3	F
F-5	SR-60	Mountain Ave to Euclid Ave	6,205	25.4	C	6,664	26.1	D	6,560	28.0	D	6,540	25.9	C
F-6	SR-60	Euclid Ave to Grove Ave	7,650	34.7	D	9,091	43.8	E	8,010	38.4	E	8,950	43.2	E
F-7	SR-60	Grove Ave to Vineyard Ave	6,923	29.6	D	9,400	47.3	F	7,290	32.5	D	9,260	46.7	F
F-8	SR-60	Vineyard Ave to Archibald Ave	6,823	28.7	D	9,400	47.3	F	7,180	31.8	D	9,240	46.5	F
F-9	SR-60	Archibald Ave to Haven Ave	6,268	25.6	C	6,471	25.1	C	6,650	28.3	D	6,290	24.7	C
F-10	SR-60	Haven Ave to Milliken Ave	6,096	19.1	C	6,864	20.6	C	6,480	20.7	C	6,670	20.3	C
F-11	SR-60	Milliken Ave to I-15	4,234	16.5	B	4,529	16.9	B	4,580	18.3	C	4,350	16.5	B
F-12	SR-60	I-15 to Etiwanda Ave/Van Buren Blvd	2,593	10.2	A	2,910	10.8	A	3,030	12.4	B	2,670	10.3	A
F-13	SR-60	Etiwanda Ave/Van Buren Blvd to Mission	3,026	11.9	B	3,968	14.8	B	3,490	14.2	B	3,770	14.5	B
F-14	SR-60	Mission Blvd/Country Village Rd to Pedley Rd	2,596	10.2	A	3,061	11.4	B	3,060	12.5	B	2,870	11.1	B
F-15	SR-60	Pedley Rd to Pyrite St	2,813	11.1	B	3,334	12.4	B	3,320	13.5	B	3,030	11.7	B
F-16	SR-60	Pyrite St to Valley Way	3,348	13.2	B	3,642	13.6	B	3,860	15.7	B	3,320	12.8	B
F-17	SR-60	Valley Way to Rubidoux Blvd	4,398	23.7	C	4,252	21.4	C	4,920	28.3	D	3,950	20.3	C
F-18	SR-60	Rubidoux Blvd to Market St	4,943	27.6	D	4,706	24.3	C	5,490	33.5	D	4,510	23.7	C
F-19	SR-60	Market St to Main St	4,498	24.4	C	7,050	47.8	F	5,040	29.3	D	6,850	46.7	F
F-20	SR-60	Main to SR-91	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-24	SR-60	Martin Luther King Blvd to Central Ave	5,865	24.6	C	8,976	45.7	F	6,600	34.2	D	8,760	50.9	F
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	4,332	16.9	B	6,795	26.6	D	4,950	20.4	C	6,710	27.2	D
F-27	SR-60	I-215 to Day St	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-29	SR-60	Pigeon Pass Rd to Heacock St	2,702	21.6	C	3,713	30.2	D	3,330	32.0	D	3,820	34.6	D
F-30	SR-60	Heacock St to Perris Blvd	2,349	18.6	C	3,355	26.1	D	3,220	30.3	D	3,480	30.2	D
F-31	SR-60	Perris Blvd to Nason St	1,812	14.3	B	2,344	17.4	B	2,750	25.0	C	2,540	20.9	C
F-32	SR-60	Nason St to Moreno Beach Dr	1,619	12.8	B	2,038	15.1	B	2,420	21.7	C	2,260	18.6	C
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	1,326	10.5	A	1,397	10.4	A	2,140	19.3	C	1,750	14.8	B
F-34	SR-60	Redlands Blvd to Theodore St	1,614	12.7	B	1,920	14.2	B	2,590	23.1	C	2,380	19.6	C
F-35	SR-60	Theodore St to Gilman Springs Rd	1,521	12.0	B	1,915	14.2	B	1,550	12.7	B	1,830	14.0	B
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	1,213	11.2	B	1,484	12.3	B	1,180	12.2	B	1,680	15.6	B
F-37	SR-60	Jack Rabbit Trail to I-10	1,215	9.6	A	1,482	11.0	A	1,180	9.5	A	1,680	12.7	B
F-39	SR-91	I-15 to McKinley St	5,914	22.6	C	9,400	53.3	F	6,120	23.8	C	9,310	52.6	F
F-40	SR-91	McKinley St to Pierce St	5,382	29.1	D	5,427	31.4	D	5,610	31.5	D	5,320	30.9	D
F-41	SR-91	Pierce St to Magnolia Ave	4,888	25.5	C	4,922	27.2	D	5,110	27.6	D	4,820	26.8	D
F-42	SR-91	Magnolia Ave to La Sierra Ave	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-43	SR-91	La Sierra Ave to Tyler St	4,585	23.5	C	4,939	27.3	D	4,790	25.3	C	4,860	27.1	D
F-44	SR-91	Tyler St to Van Buren Blvd	5,704	21.7	C	5,851	23.5	C	5,890	22.8	C	5,780	23.4	C

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ID	Freeway	Segment	Existing Conditions						Existing Plus Build-out Conditions					
			Northbound / Eastbound						Northbound / Eastbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-45	SR-91	Van Buren Blvd to Adam St	5,841	22.3	C	4,999	19.6	C	6,010	23.3	C	4,940	19.6	C
F-46	SR-91	Adam St to Madison St	6,531	26.1	D	4,742	18.7	C	6,690	27.3	D	4,700	18.8	C
F-47	SR-91	Madison St to Arlington Ave	5,879	22.8	C	4,530	17.9	B	6,020	23.8	C	4,500	17.9	B
F-49	SR-91	Central Ave to 14th St	6,021	34.8	D	5,391	30.8	D	6,100	36.2	E	5,410	31.5	D
F-51	SR-91	University Ave to Spruce St	7,244	22.1	C	6,394	20.0	C	7,300	22.5	C	6,420	20.2	C
F-66	I-215	Scott Rd to Newport Rd	2,739	22.0	C	3,285	25.8	C	2,660	21.4	C	3,280	25.9	C
F-68	I-215	Newport Rd to McCall Blvd	1,900	15.0	B	2,047	15.3	B	1,840	14.7	B	2,040	15.4	B
F-69	I-215	McCall Blvd to Ethanac Rd	2,457	19.5	C	3,293	25.8	C	2,360	18.8	C	3,290	26.0	C
F-70	I-215	Ethanac Rd to SR-74	3,787	34.5	D	3,150	24.4	C	3,690	33.3	D	3,160	24.7	C
F-71	I-215	SR-74 to Redlands Ave	3,350	28.5	D	4,181	37.4	E	3,240	27.3	D	4,230	38.6	E
F-74	I-215	Columbia Ave to Center St	5,587	33.5	D	5,150	27.3	D	5,520	33.1	D	5,290	28.6	D
F-75	I-215	Center St to La Cadena Dr	5,474	32.4	D	5,034	26.5	D	5,410	32.0	D	5,160	27.6	D
F-76	I-215	La Cadena Dr to Barton Rd	5,341	31.2	D	5,164	27.5	D	5,260	30.7	D	5,290	28.6	D
F-77	I-215	Barton Rd to Mt. Vernon Ave	5,738	35.1	E	5,533	30.3	D	5,640	34.0	D	5,680	31.8	D
F-78	I-215	Mt. Vernon Ave to I-10	5,582	22.5	C	5,420	20.5	C	5,450	21.9	C	5,580	21.3	C
F-80	I-215	Auto Plaza Dr to Mill St	4,319	17.1	B	4,533	17.0	B	4,190	16.6	B	4,620	17.4	B
F-83	I-215	Baseline Rd to Highland Ave	3,023	24.8	C	3,355	26.5	D	2,920	23.9	C	3,440	27.6	D
F-52	I-10	SR-60 to Beaumont Ave	3,037	11.9	B	4,252	16.4	B	3,050	12.0	B	4,380	17.0	B
F-53	I-10	Beaumont Ave to Pennsylvania Ave	3,087	12.1	B	4,322	16.7	B	3,070	12.0	B	4,400	17.1	B
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	3,236	12.6	B	4,531	17.5	B	3,200	12.6	B	4,610	17.9	B
F-55	I-10	Highland Springs Ave to Sunset Ave	3,112	12.2	B	4,357	16.8	B	3,060	12.0	B	4,420	17.2	B
F-56	I-10	Sunset Ave to 22nd St	3,037	11.9	B	4,252	16.4	B	2,970	11.7	B	4,310	16.7	B
F-57	I-10	22nd St to 8th St	2,987	11.7	B	4,182	16.2	B	2,920	11.5	B	4,240	16.5	B
F-58	I-10	8th St to Hargrave St	2,987	11.7	B	4,182	16.2	B	2,910	11.4	B	4,240	16.5	B
F-59	I-10	Hargrave St to Fields Rd	2,689	10.5	A	3,764	14.5	B	2,600	10.2	A	3,820	14.8	B
F-60	I-10	Fields Rd to Morongo Trail	2,564	10.0	A	3,590	13.9	B	2,480	9.7	A	3,650	14.2	B
F-61	I-10	Morongo Trail to Main St	2,265	8.8	A	3,172	12.3	B	2,190	8.6	A	3,230	12.5	B
F-62	I-10	Main St to Haugen-Lehmann Way	2,265	8.8	A	3,172	12.3	B	2,180	8.6	A	3,230	12.5	B
F-64	I-10	SR-111 to Tipton Rd	1,967	7.7	A	2,753	10.6	A	1,890	7.4	A	2,810	10.9	A
F-65	I-10	Tipton Rd to SR-62	1,967	7.7	A	2,753	10.6	A	1,920	7.5	A	2,810	10.9	A

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.AH-2: Existing (2012) plus Project Freeway Mainline Levels of Service

ID	Freeway	Segment	Existing Conditions						Existing Plus Build-out Conditions					
			Southbound / Westbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-2	SR-60	Reservoir St to Ramona Ave	8,762	41.4	E	6,381	25.6	C	8,590	40.2	E	6,580	27.1	D
F-3	SR-60	Ramona Ave to Central Ave	8,283	37.1	E	5,925	23.4	C	8,080	35.8	E	6,140	24.9	C
F-4	SR-60	Central Ave to Mountain Ave	6,336	24.7	C	6,076	24.1	C	6,120	24.0	C	6,300	25.7	C
F-5	SR-60	Mountain Ave to Euclid Ave	6,259	24.4	C	6,495	26.3	D	6,060	23.7	C	6,710	27.8	D
F-6	SR-60	Euclid Ave to Grove Ave	6,461	25.4	C	6,302	25.2	C	6,260	24.7	C	6,520	26.9	D
F-7	SR-60	Grove Ave to Vineyard Ave	6,274	24.3	C	6,699	27.4	D	6,050	23.5	C	6,930	29.1	D
F-8	SR-60	Vineyard Ave to Archibald Ave	7,658	32.1	D	6,245	25.0	C	7,400	30.9	D	6,490	26.7	D
F-9	SR-60	Archibald Ave to Haven Ave	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-10	SR-60	Haven Ave to Milliken Ave	5,804	17.4	B	5,698	17.5	B	5,510	16.7	B	5,960	18.6	C
F-11	SR-60	Milliken Ave to I-15	5,456	20.5	C	5,111	19.5	C	5,070	19.2	C	5,390	21.2	C
F-12	SR-60	I-15 to Etiwanda Ave/Van Buren Blvd	4,490	13.4	B	4,275	13.0	B	4,160	12.6	B	4,600	14.3	B
F-13	SR-60	Etiwanda Ave/Van Buren Blvd to Mission	4,220	15.7	B	3,881	14.8	B	3,850	14.6	B	4,290	16.7	B
F-14	SR-60	Mission Blvd/Country Village Rd to Pedley Rd	4,172	15.5	B	3,963	15.1	B	3,820	14.5	B	4,360	17.0	B
F-15	SR-60	Pedley Rd to Pyrite St	3,216	12.0	B	3,068	11.7	B	2,860	10.9	A	3,440	13.5	B
F-16	SR-60	Pyrite St to Valley Way	2,653	9.9	A	2,567	9.8	A	2,310	8.9	A	2,960	11.7	B
F-17	SR-60	Valley Way to Rubidoux Blvd	4,532	23.1	C	4,725	24.9	C	4,150	21.3	C	5,120	28.7	D
F-18	SR-60	Rubidoux Blvd to Market St	3,568	17.7	B	3,868	19.7	C	3,260	16.6	B	4,320	23.1	C
F-19	SR-60	Market St to Main St	5,631	30.9	D	5,109	27.6	D	5,290	28.8	D	5,540	32.4	D
F-20	SR-60	Main to SR-91	5,248	27.9	D	4,720	24.9	C	4,990	26.7	D	5,070	28.3	D
F-24	SR-60	Martin Luther King Blvd to Central Ave	7,050	30.6	D	5,800	24.1	C	6,800	31.5	D	6,420	31.6	D
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	7,461	31.1	D	6,376	25.6	C	7,140	29.9	D	7,030	30.8	D
F-27	SR-60	I-215 to Day St	7,050	47.9	F	3,093	15.9	B	7,000	50.0	F	3,530	19.5	C
F-29	SR-60	Pigeon Pass Rd to Heacock St	3,013	23.1	C	3,254	26.5	D	2,980	24.3	C	3,770	36.9	E
F-30	SR-60	Heacock St to Perris Blvd	2,638	19.9	C	2,671	20.8	C	2,710	21.9	C	3,320	30.3	D
F-31	SR-60	Perris Blvd to Nason St	1,910	14.3	B	2,045	15.8	B	2,120	17.2	B	2,830	24.8	C
F-32	SR-60	Nason St to Moreno Beach Dr	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	988	7.4	A	1,336	10.3	A	1,330	11.3	B	2,070	18.1	C
F-34	SR-60	Redlands Blvd to Theodore St	1,193	8.9	A	1,498	11.6	B	1,660	13.8	B	2,300	19.4	C
F-35	SR-60	Theodore St to Gilman Springs Rd	1,183	8.9	A	1,393	10.8	A	1,100	8.6	A	1,510	12.3	B
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	837	7.0	A	1,002	9.1	A	1,070	10.9	A	980	10.7	A
F-37	SR-60	Jack Rabbit Trail to I-10	837	6.3	A	1,002	7.7	A	1,070	8.3	A	980	7.8	A
F-39	SR-91	I-15 to McKinley St	6,402	25.1	C	5,971	24.1	C	6,240	24.4	C	6,170	25.4	C
F-40	SR-91	McKinley St to Pierce St	4,788	25.0	C	5,183	29.3	D	4,620	24.2	C	5,370	31.4	D
F-41	SR-91	Pierce St to Magnolia Ave	4,629	23.9	C	7,050	53.3	F	4,470	23.2	C	7,230	58.8	F
F-42	SR-91	Magnolia Ave to La Sierra Ave	4,894	25.7	C	7,050	53.3	F	4,740	25.0	C	7,210	58.4	F
F-43	SR-91	La Sierra Ave to Tyler St	4,467	22.9	C	5,167	29.2	D	4,290	22.1	C	5,330	31.0	D
F-44	SR-91	Tyler St to Van Buren Blvd	5,769	22.1	C	6,661	27.8	D	5,630	21.7	C	6,810	29.1	D

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ID	Freeway	Segment	Existing Conditions						Existing Plus Build-out Conditions					
			Southbound / Westbound						Southbound / Westbound					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-45	SR-91	Van Buren Blvd to Adam St	5,342	20.2	C	6,401	26.3	D	5,230	20.0	C	6,560	27.6	D
F-46	SR-91	Adam St to Madison St	4,939	18.6	C	5,453	21.5	C	4,840	18.4	C	5,590	22.4	C
F-47	SR-91	Madison St to Arlington Ave	4,218	21.4	C	4,711	25.5	C	4,140	21.2	C	4,830	26.9	D
F-49	SR-91	Central Ave to 14th St	4,737	24.7	C	4,940	27.2	D	4,700	24.7	C	5,030	28.5	D
F-51	SR-91	University Ave to Spruce St	See Weaving Analysis			See Weaving Analysis			See Weaving Analysis			See Weaving Analysis		
F-66	I-215	Scott Rd to Newport Rd	2,294	17.2	B	2,318	17.2	B	2,270	17.1	B	2,240	16.7	B
F-68	I-215	Newport Rd to McCall Blvd	2,528	19.0	C	3,111	23.7	C	2,530	19.1	C	3,040	23.2	C
F-69	I-215	McCall Blvd to Ethanac Rd	3,069	23.6	C	2,539	18.9	C	3,080	23.9	C	2,490	18.6	C
F-70	I-215	Ethanac Rd to SR-74	2,882	21.9	C	3,854	32.0	D	2,900	22.2	C	3,840	32.0	D
F-71	I-215	SR-74 to Redlands Ave	4,539	44.2	E	3,710	30.1	D	4,600	45.5	F	3,650	29.6	D
F-74	I-215	Columbia Ave to Center St	5,191	27.6	D	4,917	25.4	C	5,320	28.8	D	4,870	25.2	C
F-75	I-215	Center St to La Cadena Dr	5,541	30.4	D	5,235	27.6	D	5,690	31.9	D	5,180	27.4	D
F-76	I-215	La Cadena Dr to Barton Rd	5,414	29.4	D	5,196	27.3	D	5,530	30.5	D	5,160	27.2	D
F-77	I-215	Barton Rd to Mt. Vernon Ave	5,435	29.5	D	5,256	27.7	D	5,550	30.7	D	5,210	27.6	D
F-78	I-215	Mt. Vernon Ave to I-10	5,776	22.0	C	5,606	21.0	C	5,900	22.7	C	5,550	20.8	C
F-80	I-215	Auto Plaza Dr to Mill St	4,022	15.1	B	4,090	15.2	B	4,120	15.5	B	4,000	14.9	B
F-83	I-215	Baseline Rd to Highland Ave	4,537	44.1	E	4,700	46.7	F	4,630	46.7	F	4,610	45.2	F
F-52	I-10	SR-60 to Beaumont Ave	4,288	18.1	C	3,675	13.8	B	4,340	18.5	C	3,730	14.0	B
F-53	I-10	Beaumont Ave to Pennsylvania Ave	4,358	18.4	C	3,736	14.0	B	4,430	18.8	C	3,750	14.1	B
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	4,569	19.4	C	3,916	14.7	B	4,630	19.8	C	3,910	14.7	B
F-55	I-10	Highland Springs Ave to Sunset Ave	4,393	18.6	C	3,766	14.1	B	4,460	19.0	C	3,750	14.1	B
F-56	I-10	Sunset Ave to 22nd St	4,288	18.1	C	3,675	13.8	B	4,350	18.5	C	3,640	13.7	B
F-57	I-10	22nd St to 8th St	4,218	17.8	B	3,615	13.5	B	4,280	18.2	C	3,580	13.5	B
F-58	I-10	8th St to Hargrave St	4,218	17.8	B	3,615	13.5	B	4,280	18.2	C	3,570	13.4	B
F-59	I-10	Hargrave St to Fields Rd	3,796	16.0	B	3,254	12.2	B	3,860	16.4	B	3,190	12.0	B
F-60	I-10	Fields Rd to Morongo Trail	3,620	15.3	B	3,103	11.6	B	3,680	15.6	B	3,040	11.4	B
F-61	I-10	Morongo Trail to Main St	3,198	13.5	B	2,741	10.3	A	3,260	13.8	B	2,680	10.1	A
F-62	I-10	Main St to Haugen-Lehmann Way	3,198	13.5	B	2,741	10.3	A	3,270	13.9	B	2,680	10.1	A
F-64	I-10	SR-111 to Tipton Rd	2,777	11.7	B	2,380	8.9	A	2,840	12.1	B	2,340	8.8	A
F-65	I-10	Tipton Rd to SR-62	2,777	11.7	B	2,380	8.9	A	2,840	12.1	B	2,340	8.8	A

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Northbound or Eastbound Sections:

- SR-60 Euclid Avenue to Grove Avenue;
- SR-60 Martin Luther King Boulevard to Central Avenue; and
- I-215 SR-74/Case Road to Redlands Avenue;
- Southbound or Westbound Sections:
 - SR-60 I-215 to Day Street;
 - SR-91 Pierce Street to Magnolia Avenue;
 - SR-91 Magnolia Avenue to La Sierra Avenue;
 - I-215 SR-74/Case Road to Redlands Avenue; and
 - I-215 Baseline Road to Highland Avenue/SR-210.

A significant direct project impact would occur at the following two freeway segments under existing with project conditions:

- Northbound or Eastbound Sections:
 - SR-91 Central Avenue to 14th Street.
- Southbound and Westbound Sections:
 - SR-60 Pigeon Pass Road/Frederick Street to Heacock Street.

Freeway Weaving Analysis. Existing (2012) with project freeway weaving segment levels of service for the study area are summarized in Table 4.15.A1, which shows six freeway weaving segments would operate at unsatisfactory levels of service. The project would contribute toward the worsening of an already unsatisfactory LOS at five freeway weaving segments and, therefore, have a cumulative impact at these locations. At the other freeway weaving segment, the project would create a significant impact since the project would decrease the LOS from satisfactory to unsatisfactory.

The project would worsen the existing LOS deficiency at the following five freeway weaving segments under existing with project conditions:

- Northbound or Eastbound:
 - SR-60 SR-91 to Blaine St/3rd Street;
 - SR-60 W Blaine Street/3rd Street to University Avenue; and
 - SR-91 Arlington Avenue to Central Avenue.
- Southbound or Westbound:
 - SR-60 Central Avenue to Fair Isle Drive/Box Springs Road; and
 - SR-91 14th Street to University Avenue.

A project-specific significant impact would occur at the following freeway weaving segment under existing with project conditions:

- Northbound or Eastbound:
 - SR-60 from Central Avenue to Fair Isle Drive/Box Springs Road.

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Table 4.15.A1: Existing (2012) plus Project Freeway Weaving Segments Levels of Service

ID	Freeway	Weaving Segment	Existing Conditions						Existing Plus Build-out Conditions					
			Northbound / Eastbound			PM Peak Hour			Northbound / Eastbound			AM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
W-1	SR-60	SR-71/Garey Ave to Reservoir St	5,985	24.0	C	8,616	35.7	E	6,300	26.0	C	8,500	35.6	E
W-9	SR-60	Haven Ave to Archibald Ave	See Basic Analysis						See Basic Analysis					
W-20	SR-60	Main St to SR-91	5,418	25.8	C	7,050	33.6	D	5,890	29.0	D	6,910	33.6	D
W-21	SR-60	SR-91 to Blaine St/3rd St	3,885	14.8	B	9,400	39.0	E	4,590	18.8	B	9,270	39.4	E
W-22	SR-60	Blaine St/3rd St to University Ave	3,919	18.7	B	7,050	37.4	E	4,520	25.4	C	6,930	39.3	E
W-23	SR-60	University Ave to Martin Luther King	4,528	20.4	C	5,932	25.7	C	5,170	24.8	C	5,760	25.6	C
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs	3,856	14.5	B	7,840	32.4	D	4,700	20.8	C	7,820	35.0	E
W-27	SR-60	I-215 to Day St	2,988	10.6	B	4,704	18.8	B	3,870	17.7	B	4,810	19.5	B
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	2,995	12.8	B	4,749	20.7	C	3,710	16.9	B	4,730	21.3	C
W-32	SR-60	Moreno Beach Dr to Nason St	See Basic Analysis						See Basic Analysis					
W-42	SR-91	Magnolia Ave to La Sierra Ave	5,445	24.6	C	5,684	27.4	C	5,640	25.8	C	5,590	27.1	C
W-48	SR-91	Arlington Ave to Central Ave	7,050	35.3	E	4,073	19.6	B	7,220	36.9	E	4,080	19.9	B
W-50	SR-91	14th St to University Ave	4,643	21.8	C	4,441	21.9	C	4,690	22.3	C	4,460	22.1	C
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	See Basic Analysis						See Basic Analysis					
W-73	I-215	SR-60 to Columbia Ave	6,260	34.4	D	5,548	28.0	C	6,230	34.7	D	5,670	29.4	D
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,400	16.3	B	4,147	14.5	B	4,270	15.9	B	4,240	15.1	B
W-81	I-215	Mill St to 2nd St	5,044	23.0	C	5,095	22.5	C	4,920	22.5	C	5,180	23.0	C
W-82	I-215	5th St to Baseline Rd	3,754	16.5	B	3,590	14.9	B	3,660	16.1	B	3,670	15.4	B
W-63	I-10	Haugen-Lehmann Way to SR-111	2,265	7.5	A	3,172	10.5	B	2,180	7.2	A	3,230	10.8	B

Indicates that the LOS exceeds the target level

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ID	Freeway	Weaving Segment	Existing Conditions						Existing Plus Build-out Conditions					
			Southbound / Westbound			PM Peak Hour			Southbound / Westbound			AM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
W-1	SR-60	SR-71/Garey Ave to Reservoir St	6,125	21.4	C	5,892	20.8	C	5,950	21.0	C	6,090	21.9	C
W-9	SR-60	Haven Ave to Archibald Ave	6,288	23.5	C	6,071	23.5	C	6,010	22.6	C	6,320	25.0	C
W-20	SR-60	Main St to SR-91	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-21	SR-60	SR-91 to Blaine St/3rd St	7,729	28.6	D	7,211	27.2	C	7,360	27.7	C	7,770	30.7	D
W-22	SR-60	Blaine St/3rd St to University Ave	5,714	20.1	C	6,204	23.0	C	5,360	20.3	C	6,820	27.9	C
W-23	SR-60	University Ave to Martin Luther King	5,601	28.0	C	5,876	28.0	C	5,300	26.9	C	6,440	32.9	D
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs	7,050	37.0	E	6,026	29.3	D	6,860	38.1	E	6,500	35.2	E
W-27	SR-60	I-215 to Day St	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	4,700	31.0	D	4,197	27.2	C	4,580	30.9	D	4,760	33.4	D
W-32	SR-60	Moreno Beach Dr to Nason St	1,609	9.2	A	1,753	10.2	B	1,910	11.7	B	2,480	16.0	B
W-42	SR-91	Magnolia Ave to La Sierra Ave	See Basic Analysis			See Basic Analysis			See Basic Analysis			See Basic Analysis		
W-48	SR-91	Arlington Ave to Central Ave	4,642	21.1	C	5,118	23.8	C	4,520	20.7	C	5,250	25.0	C
W-50	SR-91	14th St to University Ave	5,179	24.1	C	7,050	35.5	E	5,230	24.6	C	7,080	36.2	E
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	5,075	14.4	B	8,804	26.9	C	5,120	14.8	B	8,840	27.3	C
W-73	I-215	SR-60 to Columbia Ave	5,877	26.4	C	5,495	24.5	C	6,000	27.3	C	5,440	24.5	C
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,890	16.8	B	4,591	16.3	B	4,970	17.2	B	4,490	16.1	B
W-81	I-215	Mill St to 2nd St	4,442	19.6	B	4,380	19.4	B	4,540	20.1	C	4,290	19.0	B
W-82	I-215	5th St to Baseline Rd	3,607	15.6	B	3,481	15.1	B	3,710	16.2	B	3,400	14.8	B
W-63	I-10	Haugen-Lehmann Way to SR-111	3,198	11.8	B	2,741	10.3	B	3,270	12.2	B	2,680	10.1	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Freeway Ramp Analysis. Existing (2012) with project freeway ramp levels of service for the study area are summarized in Table 4.15.AJ, which shows the SR-60 eastbound on-ramp from Central Avenue currently operates at LOS F in the p.m. peak hour and would also operate at LOS F under Existing Plus Project conditions, but with a higher traffic density. This would be considered a significant cumulative impact.

4.15.6.3 Year 2022 With Phase 1 Conditions Traffic and Level of Service Impacts

Threshold:	<p>Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit.</p> <p>Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</p> <p>A significant project-specific traffic impact would occur if the project would cause a decrease from satisfactory LOS (based on local agency adopted standards) to an unsatisfactory LOS on a study area intersection, roadway segment, freeway mainline lane, freeway weaving segment or freeway ramp. A significant cumulative traffic impact would occur if the project contributes traffic toward those facilities operating at unsatisfactory LOS in the pre-project condition. The adopted LOS standards are as follows:</p> <ul style="list-style-type: none">• Roadway segments: LOS C and LOS D as outlined in previously referenced Tables 4.15.B and 4.15.C.• Intersections: LOS C and LOS D as outlined in previously referenced Table 4.15.Z.• Freeway mainline: LOS D.• Freeway Ramp Merge/Diverge: LOS D.
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Intersection Analysis. Year 2022 with Phase 1 intersection levels of service for the study area intersections are summarized in Tables 4.15.AK-1 and 4.15.AK-2, which shows 34 study intersections would operate at unsatisfactory LOS in the 2022 with Phase 1 condition. Twenty-eight of these intersections would exceed the threshold of significance under 2022 No Project conditions and would therefore be considered significant cumulative impacts requiring mitigation. At six of these intersections the level of service would drop from satisfactory to unsatisfactory with the addition of Phase 1 traffic, which would also be considered a significant cumulative impact requiring mitigation.

Phase 1 of the project would have a significant cumulative impact at the following 28 intersections under year 2022 with Phase 1 conditions:

- Redlands Boulevard/Locust Avenue;
- Redlands Boulevard/SR-60 Westbound Ramps;
- Oliver Street/Alessandro Boulevard;
- Moreno Beach Drive/Ironwood Avenue;

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- Moreno Beach Drive/SR-60 Eastbound Ramps;
- Lasselle Street/Iris Avenue;
- Krameria Avenue/Perris Boulevard;
- Lasselle Street/Alessandro Boulevard;
- Lasselle Street/Cactus Avenue;
- Frederick Street/Alessandro Boulevard;
- Graham Street/Alessandro Boulevard;
- Martin Luther King Boulevard/Canyon Crest Drive;
- Perris Boulevard/Alessandro Boulevard;
- Graham Street/Cactus Avenue;
- Alessandro Boulevard/Sycamore Canyon Boulevard;
- Elsworth Street/Cactus Avenue;
- Arlington Avenue/Victoria Avenue;
- Alessandro Boulevard/Chicago Avenue;
- Ramona Expressway/Evans Road;
- Placentia Avenue/Perris Boulevard;
- Gilman Springs Road/Bridge Street;
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road;
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road;
- W. 6th Street/California Avenue;
- Ramona Expressway/Sanderson Avenue;
- San Timoteo Canyon Road/Alessandro Road;
- San Timoteo Canyon Road/Live Oak Canyon Road;
- Redlands Boulevard/San Timoteo Canyon Road; and
- W. Crescent Avenue/Alessandro Boulevard.

A significant cumulative impact would also occur at the following six intersections under year 2022 with Phase 1 conditions:

- Redlands Boulevard/Cactus Avenue;
- Kitching Street/Iris Avenue;
- Perris Boulevard/John F. Kennedy Drive;
- Iris Avenue/Perris Boulevard;
- Heacock Street/Alessandro Boulevard; and
- Day Street/Alessandro Boulevard.

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Table 4.15.AJ: Existing (2012) plus Project Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp No. of Lanes	Ramp Segment	Existing Conditions						Existing Plus Build-out Conditions									
				AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour						
				Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS
R-1	SR-60 EB	1	On-Ramp from Martin Luther King Blvd	4,110	242	16.9	B	5,678	906	26.5	C	4,740	350	20.9	C	5,480	1,300	29.6	D
R-2	SR-60 EB	1	On-Ramp from Central Ave	5,796	349	18.5	B	8,868	904	31.8	F	6,510	480	22.9	C	8,630	1,000	32.5	F
R-3	SR-60 EB	1	Off-Ramp to Redlands Blvd	1,326	119	3.3	A	1,397	30	3.2	A	2,140	390	13.9	B	1,750	450	8.6	A
R-4	SR-60 EB	1	Loop On-Ramp from Redlands Blvd	1,207	26	12.9	B	1,367	25	13.6	B	1,750	80	20.1	C	1,300	110	15.3	B
R-5	SR-60 EB	0	Direct On-Ramp from Redlands Blvd	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			
R-6	SR-60 EB	1	Off-Ramp to Theodore St	1,614	207	17.3	B	1,920	434	19.1	B	2,590	1,160	18.5	B	2,380	810	16.0	B
R-7	SR-60 EB	1	Loop On-Ramp from Theodore St	1,407	70	16.5	B	1,486	71	16.5	B	1,430	10	17.5	B	1,570	10	18.0	B
R-8	SR-60 EB	1	Direct On-Ramp from Theodore St	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			
R-9	SR-60 EB	1	Off-Ramp to Gilman Springs Rd	1,521	330	16.4	B	1,915	385	19.0	B	1,550	419	17.2	B	1,830	431	18.8	B
R-10	SR-60 EB	1	On-Ramp from Gilman Springs Rd	1,191	7	14.2	B	1,530	8	16.3	B	1,131	30	14.2	B	1,399	59	16.1	B
R-11	SR-60 WB	1	Off-Ramp to Gilman Springs Rd	837	11	9.6	A	1,002	9	11.3	B	1,070	97	12.0	B	980	30	11.4	B
R-12	SR-60 WB	1	On-Ramp from Gilman Springs Rd	826	357	13.5	B	993	306	14.6	B	973	405	15.5	B	950	466	16.2	B
R-13	SR-60 WB	1	Off-Ramp to Theodore St	1,183	24	12.7	B	1,393	26	14.9	B	1,100	210	7.1	A	1,510	90	10.1	A
R-14	SR-60 WB	1	On-Ramp from Theodore St	1,159	34	12.1	B	1,367	131	14.8	B	890	740	17.1	B	1,420	850	22.8	C
R-15	SR-60 WB	1	Off-Ramp to Redlands Blvd	1,193	49	12.8	B	1,498	38	15.9	B	1,660	100	18.7	B	2,300	60	25.2	C
R-16	SR-60 WB	1	Loop On-Ramp from Redlands Blvd	1,144	329	14.3	B	1,460	361	17.4	B	1,560	350	19.3	B	2,240	590	28.0	C
R-17	SR-60 WB	0	Direct On-Ramp from Redlands Blvd	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			
R-18	SR-60 WB	2	Off-Ramp to Central Ave	7,050	384	32.6	D	6,026	439	28.5	D	6,860	400	32.5	D	6,500	450	31.8	D
R-19	SR-60 WB	1	Off-Ramp to Martin Luther King Blvd	7,050	474	21.0	C	5,800	337	15.9	B	6,800	510	20.8	C	6,420	370	19.5	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.AK-1: Year 2022 plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
1	Theodore St/Street F	D	N/A	Non-Existent		RABT	9.8	A
2	Cactus Ave Extension/Street E	D	N/A	Non-Existent		CSS	12.7	B
3	Theodore St/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	10.0	A	RABT	10.5	B
4	Alessandro Blvd (Street C)/Street F	D	N/A	Non-Existent		CSS	9.9	A
6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	SIGNAL	5.8	A	SIGNAL	7.9	A
9	Gilman Springs Rd/Eucalyptus Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
10	Redlands Blvd/Locust Ave	C	CSS	> 180.0	F	CSS	> 180.0	F
11	Redlands Blvd/Ironwood Ave	D	SIGNAL	34.9	C	SIGNAL	31.9	C
12	Theodore Street/Ironwood Avenue	D	CSS	13.0	B	CSS	17.9	C
13	Redlands Blvd/SR-60 WB ramps	D	CSS	> 180.0	F	CSS	> 180.0	F
14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	8.9	A	SIGNAL	12.6	B
15	Theodore Str/SR-60 WB ramps	D	CSS	12.2	B	SIGNAL	14.0	B
16	Theodore Str/SR-60 EB ramps	D	CSS	12.2	B	SIGNAL	2.6	A
17	Quincy Str/Fir Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
18	Redlands Blvd/Eucalyptus Ave (Fir)	D	N/A	Non-Existent		SIGNAL	10.9	B
19	Theodore St/Fir Ave (Eucalyptus)	D	CSS	9.8	A	SIGNAL	13.6	B
20	Oliver Str/Alessandro Blvd	C	CSS	81.3	F	CSS	129.7	F
21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	17.6	B	SIGNAL	17.5	C
22	Quincy Str/Alessandro Blvd	N/A	N/A	Non-Existent		N/A	Non-Existent	
23	Redlands Blvd/Alessandro Blvd	C	AWS	30.2	D	AWS	18.7	C
24	Oliver Str/Cactus Ave	D	SIGNAL	32.5	C	SIGNAL	37.0	D
25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	18.5	B	SIGNAL	18.9	B
26	Quincy Str/Cactus Ave	N/A	N/A	Non-Existent		N/A	Non-Existent	
27	Redlands Blvd/Cactus Ave	C	AWS	13.4	B	AWS	52.8	F
28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	19.8	B	SIGNAL	29.0	C
29	Heacock Str/Ironwood Ave	D	SIGNAL	30.9	C	SIGNAL	31.1	C
30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	33.7	C	SIGNAL	34.7	C
31	Heacock St/SR-60 EB Ramps	D	SIGNAL	21.1	C	SIGNAL	21.6	C
32	Sunnymead Blvd & Perris Blvd	D	SIGNAL	29.9	C	SIGNAL	30.2	C

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Table 4.15.AK-1: Year 2022 plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	31.8	C	SIGNAL	33.7	C
34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	27.7	C	SIGNAL	28.8	C
35	Moreno Beach Dr/Locust Ave	C	CSS	9.2	A	CSS	9.3	A
36	Moreno Beach Drive & Ironwood Avenue	D	SIGNAL	90.2	F	SIGNAL	97.5	F
37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	88.7	F	SIGNAL	102.3	F
38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	50.8	D	SIGNAL	55.7	E
39	Iris Ave/Perris Blvd	D	SIGNAL	54.0	D	SIGNAL	55.5	E
40	Kitching St/Iris Ave	C	SIGNAL	28.9	C	SIGNAL	30.5	C
41	Lasselle Str/Iris Ave	D	SIGNAL	32.8	C	SIGNAL	42.1	D
42	Nason Str/Iris Ave	C	SIGNAL	8.2	A	SIGNAL	7.7	A
43	Oliver Str/Iris Ave	D	SIGNAL	28.9	C	SIGNAL	28.2	C
44	Via Dell Lago/Iris Ave	C	SIGNAL	8.8	A	SIGNAL	9.6	A
45	Krameria Ave/Perris Blvd	D	SIGNAL	> 180.0	F	SIGNAL	> 180.0	F
46	Kitching Str/Krameria Ave	D	SIGNAL	29.2	C	SIGNAL	41.2	D
47	Lasselle Str/Krameria Ave	D	SIGNAL	32.9	C	SIGNAL	33.6	C
48	Kitching Str/Alessandro Blvd	D	SIGNAL	28.5	C	SIGNAL	28.5	C
49	Lasselle Str/Alessandro Blvd	D	SIGNAL	56.1	E	SIGNAL	57.6	E
50	Morrison Str/Alessandro Blvd	D	SIGNAL	9.3	A	SIGNAL	9.3	A
51	Nason Str/Alessandro Blvd	D	SIGNAL	31.5	C	SIGNAL	32.3	C
52	Kitching Str/Cactus Ave	C	SIGNAL	32.2	C	SIGNAL	32.8	C
53	Lasselle Str/Cactus Ave	C	SIGNAL	64.0	E	SIGNAL	69.7	E
54	Morrison Str/Cactus Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
55	Nason Str/Cactus Ave	D	SIGNAL	30.6	C	SIGNAL	31.1	C
56	Frederick Str/Alessandro Blvd	D	SIGNAL	30.4	C	SIGNAL	30.7	C
57	Graham Str/Alessandro Blvd	D	SIGNAL	32.4	C	SIGNAL	32.7	C
58	Heacock Str/Alessandro Blvd	D	SIGNAL	41.8	D	SIGNAL	43.3	D
59	Indian Str/Alessandro Blvd	D	SIGNAL	24.7	C	SIGNAL	24.4	C
60	Perris Blvd/Alessandro Blvd	D	SIGNAL	50.5	D	SIGNAL	51.5	D
61	Frederick Str/Cactus Ave	D	SIGNAL	19.1	B	SIGNAL	19.9	B

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Table 4.15.AK-1: Year 2022 plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
62	Graham Str/Cactus Ave	D	SIGNAL	148.3	F	SIGNAL	154.7	F
63	Heacock Str/Cactus Ave	D	SIGNAL	42.5	D	SIGNAL	41.2	D
64	Indian Str/Cactus Ave	C	SIGNAL	28.8	C	SIGNAL	28.9	C
65	Perris Blvd/Cactus Ave	D	SIGNAL	35.7	D	SIGNAL	35.6	D
66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	38.2	D	SIGNAL	36.8	D
67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	10.9	B	SIGNAL	11.0	B
68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	25.5	C	SIGNAL	25.7	C
69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	17.3	B	SIGNAL	17.5	B
70	Day Str/Alessandro Blvd	D	SIGNAL	10.7	B	SIGNAL	10.7	B
71	Elsworth Str/Alessandro Blvd	D	SIGNAL	20.7	C	SIGNAL	20.9	C
72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	30.5	C	SIGNAL	31.8	C
73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	10.8	B	SIGNAL	12.7	B
74	Elsworth Str/Cactus Ave	D	SIGNAL	31.3	C	SIGNAL	31.2	C
75	Central Ave/Lochmoor Dr.	D	SIGNAL	19.6	B	SIGNAL	20.7	C
76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	27.6	C	SIGNAL	32.6	C
77	SR-60 EB Ramps/Central Ave	D	SIGNAL	10.9	B	SIGNAL	10.8	B
78	SR-60 WB Ramps/Central Ave	D	SIGNAL	6.6	A	SIGNAL	7.1	A
79	Alessandro Blvd/Trautwein Rd.	D	SIGNAL	29.8	C	SIGNAL	30.2	C
80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	33.2	C	SIGNAL	36.0	D
81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	34.6	C	SIGNAL	36.7	D
82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	9.2	A	SIGNAL	9.3	A
83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	100.0	F	SIGNAL	102.2	F
84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	9.6	A	SIGNAL	9.8	A
85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	27.4	D	AWS	28.0	D
86	Central Ave/Chicago Ave	D	SIGNAL	34.5	C	SIGNAL	39.0	D
87	Central Ave/EI Cerrito Dr	D	SIGNAL	13.2	B	SIGNAL	13.2	B
88	Central Ave/Canyon Crest Dr	D	SIGNAL	36.3	D	SIGNAL	37.6	D
89	Chicago Ave/Country Club Dr	D	SIGNAL	9.4	A	SIGNAL	9.8	A
90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	36.9	D	SIGNAL	37.3	D

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Table 4.15.AK-1: Year 2022 plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	22.1	C	SIGNAL	22.1	C
92	Arlington Ave/Maude St	D	SIGNAL	14.3	B	SIGNAL	14.3	B
93	Horace St/Arlington Ave	D	SIGNAL	19.7	B	SIGNAL	21.6	C
94	Arlington Ave/Victoria Ave	D	SIGNAL	84.2	F	SIGNAL	88.4	F
95	Alessandro Blvd/Chicago Ave	D	SIGNAL	64.5	E	SIGNAL	69.8	E
96	Alessandro Blvd/Century Ave	D	SIGNAL	32.5	C	SIGNAL	32.9	C
97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	29.5	C	SIGNAL	29.9	C
98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	30.6	C	SIGNAL	30.9	C
99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	33.3	C	SIGNAL	43.8	D
100	Harley Knox Blvd/Evan Rd	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
101	Ramona Expy/Indian St	E	SIGNAL	18.6	B	SIGNAL	21.4	C
102	Ramona Expy/Perris Blvd	E	SIGNAL	34.3	C	SIGNAL	36.0	D
103	Ramona Expy/Evans Rd	E	SIGNAL	139.7	F	SIGNAL	145.0	F
104	Perris Blvd/Morgan St	D	SIGNAL	14.6	B	SIGNAL	14.4	B
105	Evans Rd/Morgan St	C	SIGNAL	32.8	C	SIGNAL	32.4	C
106	Perris Blvd/Rider St	C	SIGNAL	17.6	B	SIGNAL	18.4	B
107	Evans Rd/Rider St	C	SIGNAL	34.4	C	SIGNAL	34.7	C
108	Perris Blvd/Mid-County Pkwy WB Ramps	D	SIGNAL	29.2	C	SIGNAL	30.1	C
109	Perris Blvd/Mid-County Pkwy EB Ramps	D	SIGNAL	19.2	B	SIGNAL	30.8	C
110	Evans Rd/Mid-County Pkwy WB Ramps	D	SIGNAL	38.0	D	SIGNAL	37.9	D
111	Evans Rd/Mid-County Pkwy EB Ramps	D	SIGNAL	14.6	B	SIGNAL	14.9	B
112	Placentia Ave/Perris Blvd	D	SIGNAL	40.8	D	SIGNAL	41.7	D
113	Evans Rd/Placentia Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
114	Evans Rd/Orange Ave	C	AWS	22.1	C	AWS	22.1	C
115	Evans Rd/Nuevo Rd	C	SIGNAL	32.0	C	SIGNAL	32.0	C
116	Evans Rd/Ellis Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
117	Ellis Ave/I-215 SB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
118	Ellis Ave/SR-215 NB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
119	Evans Rd/San Jacinto Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent

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Table 4.15.AK-1: Year 2022 plus Phase 1 Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
120	Park Center Blvd/Ramona Expy WB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
121	Park Center Blvd/Ramona Expy EB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
122	Bridge St/Ramona Expy	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
123	Gilman Springs Rd/Bridge Str	C	CSS	22.3	C	CSS	25.4	
124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	> 180.0	F	CSS	> 180.0	
125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	> 180.0	F	CSS	> 180.0	
126	Ramona Expy/Sanderson Ave	D	SIGNAL	35.7	D	SIGNAL	40.6	
127	Potrero Blvd/SR-60 WB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
128	Potrero Blvd/SR-60 EB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
129	W 6th St/California Ave	C	AWS	31.8	D	AWS	40.9	
130	W 6th St/Beaumont Ave	C	SIGNAL	15.7	B	SIGNAL	16.0	
131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	13.7	B	SIGNAL	13.2	
132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	> 180.0	F	AWS	> 180.0	
133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	169.8	F	AWS	> 180.0	
134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	> 180.0	F	AWS	> 180.0	
135	W Crescent Ave/Alessandro Blvd	C	CSS	27.7	D	CSS	40.9	
136	W Sunset Dr/Alessandro Blvd	C	AWS	10.9	B	AWS	11.9	

Notes

- : "CSS" means cross-street is stop-controlled
- : "AWS" means all-way stop
- : "Non-Existent" indicates that the intersection exists in some scenarios but not in the scenario being reported
- : denotes LOS exceeding the target threshold

"RABT" means roundabout

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15.AK-2: Year 2022 plus Phase 1 Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
1	Theodore Str/Street F	D	N/A	Non-Existent	Non-Existent	RABT	12.8	B
2	Cactus Ave Extension/Street E	D	N/A	Non-Existent	Non-Existent	CSS	13.9	B
3	Theodore Str/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	10.3	B	RABT	10.6	B
4	Alessandro Blvd (Street C)/Street F	D	N/A	Non-Existent	Non-Existent	CSS	9.4	A
6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	SIGNAL	7.9	A	SIGNAL	10.9	B
9	Gilman Springs Rd/Eucalyptus Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
10	Redlands Blvd/Locust Ave	C	CSS	> 180.0	F	CSS	> 180.0	F
11	Redlands Blvd/Ironwood Ave	D	SIGNAL	31.7	C	SIGNAL	26.1	C
12	Theodore Street/Ironwood Avenue	D	CSS	17.8	C	CSS	25.5	D
13	Redlands Blvd/SR-60 WB ramps	D	CSS	> 180.0	F	CSS	> 180.0	F
14	Redlands Blvd/SR-60 EB ramps	D	SIGNAL	15.9	B	SIGNAL	18.5	B
15	Theodore Str/SR-60 WB ramps	D	CSS	19.2	C	SIGNAL	17.4	B
16	Theodore Str/SR-60 EB ramps	D	CSS	23.2	C	SIGNAL	2.6	A
17	Quincy Str/Fir Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
18	Redlands Blvd/Eucalyptus Ave (Fir)	D	N/A	Non-Existent	Non-Existent	SIGNAL	17.0	B
19	Theodore Str/Fir Ave (Eucalyptus)	D	CSS	41.7	E	SIGNAL	37.9	D
20	Oliver Str/Alessandro Blvd	C	CSS	67.7	F	CSS	98.9	F
21	Moreno Beach Dr/Alessandro Blvd	D	SIGNAL	18.5	B	SIGNAL	20.8	C
22	Quincy Str/Alessandro Blvd	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
23	Redlands Blvd/Alessandro Blvd	C	AWS	14.1	B	AWS	15.8	C
24	Oliver Str/Cactus Ave	D	SIGNAL	25.7	C	SIGNAL	27.2	C
25	Moreno Beach Dr/Cactus Ave	C	SIGNAL	18.9	B	SIGNAL	19.7	B
26	Quincy Str/Cactus Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
27	Redlands Blvd/Cactus Ave	C	AWS	9.5	A	AWS	105.0	F
28	Moreno Beach Dr/John Kennedy Dr	D	SIGNAL	18.9	B	SIGNAL	44.7	D
29	Heacock Str/Ironwood Ave	D	SIGNAL	36.9	D	SIGNAL	38.0	D
30	Heacock Str/SR-60 WB Ramps	D	SIGNAL	47.5	D	SIGNAL	49.5	D
31	Heacock Str/SR-60 EB Ramps	D	SIGNAL	24.7	C	SIGNAL	25.4	C
32	Sunnymead Blvd/Perris Blvd	D	SIGNAL	39.2	D	SIGNAL	39.3	D
33	Perris Blvd/SR-60 WB Ramps	D	SIGNAL	21.7	C	SIGNAL	23.7	C
34	Perris Blvd/Eucalyptus Ave	D	SIGNAL	33.4	C	SIGNAL	34.1	C
35	Moreno Beach Dr/Locust Ave	C	CSS	9.6	A	CSS	9.8	A

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Table 4.15.AK-2: Year 2022 plus Phase 1 Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
36	Moreno Beach Dr/Ironwood Ave	D	SIGNAL	51.0	D	SIGNAL	54.9	D
37	Moreno Beach Dr/SR-60 EB Ramps	D	SIGNAL	37.8	D	SIGNAL	45.5	D
38	Perris Blvd/John F. Kennedy Dr	D	SIGNAL	53.5	D	SIGNAL	55.9	E
39	Iris Ave/Perris Blvd	D	SIGNAL	38.6	D	SIGNAL	38.4	D
40	Kitching Str/Iris Ave	C	SIGNAL	23.9	C	SIGNAL	49.8	D
41	Lasselle Str/Iris Ave	D	SIGNAL	68.7	E	SIGNAL	89.5	F
42	Nason Str/Iris Ave	C	SIGNAL	11.7	B	SIGNAL	12.9	B
43	Oliver Str/Iris Ave	D	SIGNAL	22.0	C	SIGNAL	23.0	C
44	Via Dell Lago/Iris Ave	C	SIGNAL	8.3	A	SIGNAL	8.1	A
45	Krameria Ave/Perris Blvd	D	SIGNAL	> 180.0	F	SIGNAL	> 180.0	F
46	Kitching Str/Krameria Ave	D	SIGNAL	40.0	D	SIGNAL	47.6	D
47	Lasselle Str/Krameria Ave	D	SIGNAL	15.3	B	SIGNAL	15.7	B
48	Kitching Str/Alessandro Blvd	D	SIGNAL	25.7	C	SIGNAL	26.0	C
49	Lasselle Str/Alessandro Blvd	D	SIGNAL	41.9	D	SIGNAL	42.9	D
50	Morrison Str/Alessandro Blvd	D	SIGNAL	9.2	A	SIGNAL	9.3	A
51	Nason Str/Alessandro Blvd	D	SIGNAL	29.5	C	SIGNAL	31.5	C
52	Kitching Str/Cactus Ave	C	SIGNAL	26.2	C	SIGNAL	26.5	C
53	Lasselle Str/Cactus Ave	C	SIGNAL	52.8	D	SIGNAL	56.6	E
54	Morrison Str/Cactus Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	Non-Existent
55	Nason Str/Cactus Ave	D	SIGNAL	32.8	C	SIGNAL	35.3	D
56	Frederick Str/Alessandro Blvd	D	SIGNAL	61.7	E	SIGNAL	74.8	E
57	Graham Str/Alessandro Blvd	D	SIGNAL	76.8	E	SIGNAL	77.6	E
58	Heacock Str/Alessandro Blvd	D	SIGNAL	48.9	D	SIGNAL	59.7	E
59	Indian Str/Alessandro Blvd	D	SIGNAL	33.5	C	SIGNAL	39.6	D
60	Perris Blvd/Alessandro Blvd	D	SIGNAL	113.4	F	SIGNAL	120.7	F
61	Frederick Str/Cactus Ave	D	SIGNAL	15.6	B	SIGNAL	16.3	B
62	Graham Str/Cactus Ave	D	SIGNAL	66.6	E	SIGNAL	69.9	E
63	Heacock Str/Cactus Ave	D	SIGNAL	32.9	C	SIGNAL	33.6	C
64	Indian Str/Cactus Ave	C	SIGNAL	22.0	C	SIGNAL	22.1	C
65	Perris Blvd/Cactus Ave	D	SIGNAL	32.7	C	SIGNAL	33.5	C
66	Alessandro Blvd/Sycamore Canyon Blvd	D	SIGNAL	58.3	E	SIGNAL	76.7	E
67	I-215 SB Ramps/Alessandro Blvd	D	SIGNAL	8.9	A	SIGNAL	8.6	A

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Table 4.15.AK-2: Year 2022 plus Phase 1 Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
68	I-215 NB Ramps/Alessandro Blvd	D	SIGNAL	23.3	C	SIGNAL	33.5	C
69	Old 215 Frontage Rd/Alessandro Blvd	D	SIGNAL	35.4	D	SIGNAL	42.1	D
70	Day Str/Alessandro Blvd	D	SIGNAL	43.0	D	SIGNAL	76.5	E
71	Elsworth Str/Alessandro Blvd	D	SIGNAL	34.7	C	SIGNAL	36.3	D
72	I-215 SB Ramps/Cactus Ave	D	SIGNAL	89.5	F	SIGNAL	89.5	F
73	I-215 NB Ramps/Cactus Ave	D	SIGNAL	12.6	B	SIGNAL	40.4	D
74	Elsworth Str/Cactus Ave	D	SIGNAL	175.7	F	SIGNAL	> 180.0	F
75	Central Ave/Lochmoor Dr.	D	SIGNAL	30.3	C	SIGNAL	52.8	D
76	Sycamore Canyon Blvd/Central Ave	D	SIGNAL	29.8	C	SIGNAL	31.1	C
77	SR-60 EB Ramps/Central Ave	D	SIGNAL	11.7	B	SIGNAL	11.9	B
78	SR-60 WB Ramps/Central Ave	D	SIGNAL	7.4	A	SIGNAL	7.8	A
79	Alessandro Blvd/Trautwein Rd.	D	SIGNAL	15.5	B	SIGNAL	15.5	B
80	Alessandro Blvd/Mission Grove Pkwy	D	SIGNAL	48.3	D	SIGNAL	50.0	D
81	Martin Luther King Blvd/Chicago Ave	D	SIGNAL	48.4	D	SIGNAL	51.7	D
82	Martin Luther King Blvd/Iowa Ave	D	SIGNAL	16.7	B	SIGNAL	17.5	B
83	Martin Luther King Blvd/Canyon Crest Dr	D	SIGNAL	41.2	D	SIGNAL	42.7	D
84	Martin Luther King Blvd/I-215 SB Ramps	D	SIGNAL	5.6	A	SIGNAL	5.7	A
85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	15.0	C	AWS	15.6	C
86	Central Ave/Chicago Ave	D	SIGNAL	40.8	D	SIGNAL	43.4	D
87	Central Ave/El Cerrito Dr	D	SIGNAL	17.3	B	SIGNAL	17.6	B
88	Central Ave/Canyon Crest Dr	D	SIGNAL	51.2	D	SIGNAL	53.0	D
89	Chicago Ave/Country Club Dr	D	SIGNAL	7.1	A	SIGNAL	7.0	A
90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	SIGNAL	35.4	D	SIGNAL	36.6	D
91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	SIGNAL	31.3	C	SIGNAL	31.3	C
92	Arlington Ave/Maude St	D	SIGNAL	13.5	B	SIGNAL	13.6	B
93	Horace St/Arlington Ave	D	SIGNAL	10.1	B	SIGNAL	10.3	B
94	Arlington Ave/Victoria Ave	D	SIGNAL	83.7	F	SIGNAL	92.9	F
95	Alessandro Blvd/Chicago Ave	D	SIGNAL	114.7	F	SIGNAL	121.2	F
96	Alessandro Blvd/Century Ave	D	SIGNAL	14.9	B	SIGNAL	15.0	B
97	Alessandro Blvd/Via Vista Dr	D	SIGNAL	20.5	C	SIGNAL	20.9	C
98	Alessandro Blvd/Canyon Crest Dr	D	SIGNAL	30.2	C	SIGNAL	30.2	C
99	Harley Knox Blvd/Perris Blvd	D	SIGNAL	25.5	C	SIGNAL	28.4	C

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Table 4.15.AK-2: Year 2022 plus Phase 1 Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
100	Harley Knox Blvd/Evan Rd	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
101	Ramona Expy/Indian St	E	SIGNAL	39.7	D	SIGNAL	41.8	
102	Ramona Expy/Perris Blvd	E	SIGNAL	31.2	C	SIGNAL	31.5	
103	Ramona Expy/Evans Rd	E	SIGNAL	41.6	D	SIGNAL	45.1	
104	Perris Blvd/Morgan St	D	SIGNAL	12.7	B	SIGNAL	12.6	
105	Evans Rd/Morgan St	C	SIGNAL	29.7	C	SIGNAL	29.0	
106	Perris Blvd/Rider St	C	SIGNAL	22.7	C	SIGNAL	23.4	
107	Evans Rd/Rider St	C	SIGNAL	30.3	C	SIGNAL	30.0	
108	Perris Blvd/Mid-County Pkwy WB Ramps	D	SIGNAL	20.8	C	SIGNAL	21.2	
109	Perris Blvd/Mid-County Pkwy EB Ramps	D	SIGNAL	32.4	C	SIGNAL	34.6	
110	Evans Rd/Mid-County Pkwy WB Ramps	D	SIGNAL	32.2	C	SIGNAL	32.1	
111	Evans Rd/Mid-County Pkwy EB Ramps	D	SIGNAL	25.9	C	SIGNAL	26.3	
112	Placentia Ave/Perris Blvd	D	SIGNAL	60.0	E	SIGNAL	61.4	
113	Evans Rd/Placentia Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
114	Evans Rd/Orange Ave	C	AWS	16.9	C	AWS	17.7	
115	Evans Rd/Nuevo Rd	C	SIGNAL	32.2	C	SIGNAL	32.2	
116	Evans Rd/Ellis Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
117	Ellis Ave/I-215 SB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
118	Ellis Ave/SR-215 NB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
119	Evans Rd/San Jacinto Ave	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
120	Park Center Blvd/Ramona Expy WB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
121	Park Center Blvd/Ramona Expy EB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
122	Bridge St/Ramona Expy	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
123	Gilman Springs Rd/Bridge Str	C	CSS	25.7	D	CSS	26.7	
124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	108.0	F	CSS	> 180.0	
125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	123.3	F	CSS	145.4	
126	Ramona Expy/Sanderson Ave	D	SIGNAL	24.4	C	SIGNAL	24.8	
127	Potrero Blvd/SR-60 WB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
128	Potrero Blvd/SR-60 EB Ramps	N/A	N/A	Non-Existent	Non-Existent	N/A	Non-Existent	
129	W 6th St/California Ave	C	AWS	55.0	F	AWS	64.0	
130	W 6th St/Beaumont Ave	C	SIGNAL	25.3	C	SIGNAL	28.0	
131	Reche Canyon Rd/Reche Vista Dr	C	SIGNAL	6.3	A	SIGNAL	6.2	

Table 4.15.AK-2: Year 2022 plus Phase 1 Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2022 No Project			2022 With Phase 1		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	125.1	F	AWS	> 180.0	F
133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	> 180.0	F	AWS	> 180.0	F
134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	> 180.0	F	AWS	> 180.0	F
135	W Crescent Ave/Alessandro Blvd	C	CSS	16.2	C	CSS	18.5	C
136	W Sunset Dr/Alessandro Blvd	C	AWS	11.1	B	AWS	11.5	B

Notes "CSS" means cross-street is stop-controlled "AWS" means all-way stop "RABT" means roundabout

"Non-Existent" indicates that the intersection exists in some scenarios but not in the scenario being reported

denotes LOS exceeding the target threshold

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Roadway Analysis. Year 2022 with Phase 1 roadway segment levels of service for the study area intersections are summarized in Table 4.15.AL, which shows three roadway segments would operate at unsatisfactory levels of service. Phase 1 of the project would contribute toward the worsening of an already unsatisfactory LOS at two roadway segments and, therefore, have a significant cumulative impact at these locations and mitigation is required. One roadway segment would drop from satisfactory to unsatisfactory level of service with the addition of Phase 1 traffic, which would also be considered a significant cumulative impact and mitigation is required.

Phase 1 of the project would have a significant cumulative impact at the following roadway segments under year 2022 with Phase 1 conditions:

- Gilman Springs Road between Alessandro Boulevard to Bridge Street; and
- Gilman Springs Road between SR-60 and Alessandro Boulevard.

Phase 1 of the project would also create a significant cumulative impact at the following roadway segment under year 2022 with Phase 1 conditions:

- Redlands Boulevard from Fir (future Eucalyptus) Avenue to the SR-60 Eastbound Ramps.

Freeway Segment Analysis. Year 2022 with Phase 1 freeway segment levels of service for the study area are summarized in Table 4.15.AM, which shows 33 freeway segments would operate at unsatisfactory levels of service in the year 2022 with Phase 1 condition. Phase 1 of the project would contribute toward the worsening of an already unsatisfactory LOS at 29 freeway segments and, therefore, have a significant cumulative impact at these locations. At four freeway segments, Phase 1 of the project would create a decrease in the LOS from satisfactory to unsatisfactory, resulting in a significant cumulative impact.

Phase 1 of the project would have a significant cumulative impact at the following 29 freeway segments under year 2022 with Phase 1 conditions:

- Northbound or Eastbound Sections:
 - SR-60 S. Reservoir Street to Ramona Avenue;
 - SR-60 Central Avenue to Mountain Avenue;
 - SR-60 Euclid Avenue to Grove Avenue;
 - SR-60 Grove Avenue to Vineyard Avenue;
 - SR-60 Vineyard Avenue to Archibald Avenue;
 - SR-60 Valley Way to Rubidoux Boulevard;
 - SR-60 Rubidoux Boulevard to Market Street;
 - SR-60 Market Street to Main Street;
 - SR-60 Martin Luther King Boulevard to Central Avenue;
 - SR-60 Pigeon Pass Road/Frederick Street to Heacock Street;
 - SR-60 Heacock Street to Perris Boulevard;
 - SR-91 Pierce Street to Magnolia Avenue;
 - I-215 Columbia Avenue to Center Street;

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Table 4.15.AL: Year 2022 plus Phase 1 Roadway Levels of Service

Roadway	From	To	LOS Standard*	2022 No-Project Conditions			2022 Phase 1 Conditions			Project Significant Impact?	Mitigation Measures Required to Reduce Impacts to Less-Than-Significant	LOS after Mitigation
				Roadway Section**	Daily Volume	LOS	Roadway Section**	Daily Volume	LOS			
S-1 Theodore Street (A)	SR-60 WB Ramps	Ironwood Ave	D	2U	3,133	A	2U	4,243	A	No		
S-2 Theodore Street (A)	SR-60 EB Ramps	Fir (Eucalyptus) Ave	D	2U	6,689	A	6D	29,448	A	No		
S-3 Fir (Eucalyptus) Ave	Redlands Blvd	Theodore Street (A)	D	2U***	6,542	A	4D	7,234	A	No		
S-4 Eucalyptus Ave (B)	Theodore Street (A)	Gilman Springs Rd	N/A					Future Road		No		
S-5 Theodore Street (A)	Fir (Eucalyptus) Ave	Street E	D	2U	1,116	A	6D	30,318	A	No		
S-6 Street E	Theodore Street (A)	Cactus Ave Extension	D				4U	14,908	A	No		
S-7 Street F	Theodore Street (A)	Alessandro Blvd (Street C)	D				2U	2,242	A	No		
S-8 Theodore Street (A)	Fir (Eucalyptus) Ave	Alessandro Blvd (Street C)	D	2U	1,116	A	4D	11,017	A	No		
S-9 Alessandro Blvd (Street E)	Merwin Street	Theodore Street (A)	D	2U	3,778	A	4U	7,226	A	No		
S-10 Cactus Ave Extension	Alessandro Blvd (Street E)	Cactus Ave	D				4U	9,689	A	No		
S-11 Alessandro Blvd (Street C)	Theodore Street (A)	Street F	D	2U	2,321	A	4U	4,768	A	No		
S-13 Alessandro Blvd (Street C)	Street F	Gilman Springs Rd	D	2U	2,321	A	4U	4,347	A	No		
S-14 Alessandro Blvd	Moreno Beach Drive	Redlands Blvd	D	4U	4,796	A	4U	4,675	A	No	****	
S-16 Gilman Springs Rd	Alessandro Blvd (Street C)	Bridge Street	D	2U	15,512	F	2U	16,492	F	Yes	Widen to 4 lanes	
S-17 Gilman Springs Rd	SR-60	Alessandro Blvd (Street C)	D	2U	12,819	F	2U	12,829	F	Yes	Widen to 4 lanes	
S-18 Redlands Blvd	SR-60 EB Ramps	Fir (Eucalyptus) Ave	D	2U	11,042	D	2U	15,071	E	Yes	Widen to 4 lanes	
S-19 Redlands Blvd	Fir (Eucalyptus) Ave	Alessandro Blvd	C	2U	8,416	B	2U	6,575	A	No		
S-20 Alessandro Blvd	Redlands Blvd	Merwin Street	C	2U	3,886	A	2U	772	A	No		
S-21 Redlands Blvd	Alessandro Blvd	Cactus Ave	C	2U	8,583	A	2U	4,755	A	No		
S-22 Cactus Ave	Redlands Blvd	Cactus Ave Extension	C	2U***	472	A	2U	9,689	C	No		

* LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways.

** Section is the number of lanes, with "U" for "undivided" and "D" for "Divided" roadways.

*** Road currently has 2 lanes in one direction and 1 lane in the other. The capacity shown is based on the narrower direction.

**** Due to the severing of Alessandro Blvd and the diversion of traffic to other routes, there is no need to widen this section beyond the current 2U configuration.

□ Indicates LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15-AM-1: Year 2022 plus Phase 1 Freeway Mainline Levels of Service (Northbound/Eastbound)

ID	Freeway	Segment	2022 No Project						2022 Plus Phase 1					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS									
F-2	SR-60	Reservoir St to Ramona Ave	7,210	30.5	D	7,830	35.1	E	7,400	32.0	D	7,810	35.3	E
F-3	SR-60	Ramona Ave to Central Ave	6,850	28.2	D	9,380	51.4	F	7,010	29.4	D	9,340	50.8	F
F-4	SR-60	Central Ave to Mountain Ave	7,590	33.0	D	9,350	51.0	F	7,750	34.5	D	9,320	51.2	F
F-5	SR-60	Mountain Ave to Euclid Ave	7,520	32.5	D	6,690	27.5	D	7,690	34.0	D	6,640	27.4	D
F-6	SR-60	Euclid Ave to Grove Ave	8,990	45.8	F	9,280	50.0	F	9,190	48.8	F	9,240	50.1	F
F-7	SR-60	Grove Ave to Vineyard Ave	8,170	37.6	E	9,530	53.6	F	8,370	39.7	E	9,480	52.8	F
F-8	SR-60	Vineyard Ave to Archibald Ave	8,080	36.5	E	9,470	52.7	F	8,280	38.6	E	9,410	52.5	F
F-9	SR-60	Archibald Ave to Haven Ave	7,590	32.8	D	6,630	27.2	D	7,810	34.7	D	6,560	27.0	D
F-10	SR-60	Haven Ave to Milliken Ave	7,400	23.2	C	7,040	22.1	C	7,630	24.2	C	6,950	21.9	C
F-11	SR-60	Milliken Ave to I-15	5,280	20.3	C	4,530	17.4	B	5,500	21.5	C	4,440	17.2	B
F-12	SR-60	Elwanda Ave to Van Buren Blvd	4,580	17.6	B	3,440	13.3	B	4,840	18.8	C	3,380	13.3	B
F-13	SR-60	Elwanda Ave/Van Buren Blvd to Mission Blvd/County Village Rd	5,070	19.6	C	4,460	17.2	B	5,300	20.8	C	4,380	17.2	B
F-14	SR-60	Mission Blvd/County Village Rd to Peasley Rd	4,600	17.7	B	3,560	13.8	B	4,850	19.0	C	3,480	13.7	B
F-15	SR-60	Peasley Rd to Pyrite St	4,620	17.8	B	3,710	14.4	B	4,880	19.1	C	3,640	14.3	B
F-16	SR-60	Pyrite St to Valley Way Blvd	5,190	20.1	C	3,990	15.5	B	5,460	21.5	C	3,910	15.3	B
F-17	SR-60	Valley Way to Rubidoux Blvd	6,280	39.4	E	4,530	24.1	C	6,530	43.6	E	4,450	24.0	C
F-18	SR-60	Rubidoux Blvd to Market St	6,920	48.7	F	4,950	27.2	D	7,180	54.3	F	4,860	26.9	D
F-19	SR-60	Market St to Main St	6,450	41.6	E	7,260	56.8	F	6,810	48.0	F	7,230	56.9	F
F-20	SR-60	Main to SR-91	See Weaving Analysis											
F-24	SR-60	Martin Luther King Blvd to Central Ave	8,440	41.5	E	9,140	53.5	F	8,980	53.0	F	9,210	59.2	F
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	6,450	25.7	C	7,270	30.8	D	6,900	29.0	D	7,320	31.7	D
F-27	SR-60	I-215 to Day St	See Weaving Analysis											
F-29	SR-60	Pigeon Pass Rd to Heacock St	3,520	29.2	D	4,200	39.3	E	3,930	37.2	E	4,170	41.0	E
F-30	SR-60	Heacock St to Perris Blvd	3,160	25.0	C	4,050	36.7	E	3,780	35.0	E	4,070	39.1	E
F-31	SR-60	Perris Blvd to Nason St	2,590	19.8	C	3,070	24.3	C	3,270	28.1	C	3,140	26.3	D
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	1,910	14.5	B	2,370	18.0	C	2,780	23.4	C	2,540	20.7	C
F-34	SR-60	Redlands Blvd to Theodore St	2,460	18.8	C	3,240	25.8	C	3,300	28.9	D	3,350	28.7	D
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	2,310	19.2	C	2,770	23.6	C	2,240	18.6	C	2,780	23.6	C
F-37	SR-60	Jack Rabbit Trail to I-10	2,070	15.8	B	2,820	21.8	C	2,040	15.7	B	2,850	22.3	C
F-39	SR-91	I-15 to McKinley St	7,190	22.3	C	10,400	38.6	E	7,330	22.9	C	10,350	38.6	E
F-40	SR-91	McKinley St to Pierce St	6,500	26.1	D	5,950	23.5	D	6,620	26.8	D	5,900	23.4	C
F-41	SR-91	Pierce St to Magnolia Ave	5,970	35.2	E	5,410	30.5	D	6,070	36.6	E	5,350	30.2	D
F-42	SR-91	Magnolia Ave to La Sierra Ave	See Weaving Analysis											
F-43	SR-91	La Sierra Ave to Tyler St	5,490	30.9	D	5,230	29.0	D	5,600	32.2	D	5,200	29.0	D

Table 4.15-AM-1: Year 2022 plus Phase 1 Freeway Mainline Levels of Service (Northbound/Eastbound)

ID	Freeway	Segment	2022 No Project						2022 Plus Phase 1					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-44	SR-91	Tyler St to Van Buren Blvd	6,600	26.6	D	5,980	23.6	C	6,700	27.4	D	5,950	23.6	C
F-45	SR-91	Van Buren Blvd to Adam St	6,700	27.2	D	5,250	20.3	C	6,780	27.8	D	5,220	20.3	C
F-46	SR-91	Adam St to Madison St	7,310	31.4	D	4,970	19.4	C	7,380	32.1	D	4,940	19.3	C
F-47	SR-91	Madison St to Arlington Ave	6,710	27.6	D	4,970	19.4	C	6,770	28.2	D	4,950	19.4	C
F-49	SR-91	Central Ave to 14th St	5,910	34.9	D	5,070	27.7	D	5,940	35.5	E	5,070	27.7	D
F-51	SR-91	University Ave to Spruce St	8,270	26.6	D	7,700	24.2	C	8,350	27.1	D	7,700	24.4	C
F-52	I-10	SR-60 to Beaumont Ave	4,390	16.8	B	6,080	24.1	C	4,360	16.8	B	6,080	24.1	C
F-53	I-10	Beaumont Ave to Pennsylvania Ave	4,450	17.1	B	6,240	24.9	C	4,430	17.0	B	6,260	25.0	C
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	4,640	17.8	B	6,480	26.2	D	4,620	17.8	B	6,510	26.3	D
F-55	I-10	Highland Springs Ave to Sunset Ave	4,560	17.5	B	6,210	24.8	C	4,530	17.4	B	6,240	24.9	C
F-56	I-10	Sunset Ave to 22nd St	4,470	17.2	B	5,960	23.5	C	4,430	17.0	B	5,990	23.7	C
F-57	I-10	22nd St to 8th St	4,380	16.6	B	5,800	22.8	C	4,340	16.7	B	5,840	23.0	C
F-58	I-10	8th St to Hargrave St	4,370	16.8	B	5,730	22.4	C	4,330	16.6	B	5,770	22.6	C
F-59	I-10	Hargrave St to Fields Rd	4,100	15.8	B	5,350	20.8	C	4,040	15.5	B	5,390	20.9	C
F-60	I-10	Fields Rd to Morongo Tr	3,770	14.5	B	5,080	19.6	C	3,720	14.3	B	5,130	19.8	C
F-61	I-10	Morongo Tr to Main St	3,410	13.1	B	4,670	18.0	B	3,360	12.9	B	4,710	18.1	C
F-62	I-10	Main St to Haugen-Lehmann Way	3,280	12.6	B	4,720	18.1	C	3,230	12.4	B	4,770	18.3	C
F-64	I-10	SR-111 to Tipton Rd	2,950	11.3	B	4,140	15.9	B	2,900	11.1	B	4,180	16.1	B
F-65	I-10	Tipton Rd to SR-62	2,810	10.8	A	4,170	16.0	B	2,780	10.7	A	4,220	16.2	B
F-66	I-215	Scott Rd to Newport Rd	2,850	14.5	B	4,330	22.4	C	2,830	14.5	B	4,330	22.4	C
F-68	I-215	Newport Rd to McCall Blvd	2,100	10.8	A	3,140	15.9	B	2,090	10.7	A	3,120	15.8	B
F-69	I-215	McCall Blvd to Ethanac Rd	2,750	14.0	B	4,380	22.7	C	2,730	14.0	B	4,360	22.7	C
F-70	I-215	Ethanac Rd to SR-74	4,200	21.7	C	4,100	21.0	C	4,170	21.6	C	4,080	21.0	C
F-71	I-215	SR-74 to Reedlands Ave	3,490	17.7	B	4,800	25.4	C	3,470	17.7	B	4,780	25.5	C
F-74	I-215	Columbia Ave to Center St	6,090	36.8	E	6,030	36.2	E	6,060	36.5	E	6,060	36.5	E
F-75	I-215	Center St to La Cadena Dr	5,830	34.1	D	5,800	33.8	D	5,810	33.9	D	5,840	34.2	D
F-76	I-215	La Cadena Dr to Barton Rd	5,690	32.7	D	6,130	37.3	E	5,680	32.7	D	6,190	38.0	E
F-77	I-215	Barton Rd to Mt. Vernon Ave	5,980	35.6	E	6,550	42.5	E	5,960	35.4	E	6,610	43.3	E
F-78	I-215	Mt. Vernon Ave to I-10	5,770	22.5	C	6,660	27.0	D	5,740	22.4	C	6,750	27.5	D
F-80	I-215	Auto Plaza Dr to Mill St	4,490	17.2	B	5,500	21.2	C	4,440	17.0	B	5,530	21.4	C
F-83	I-215	Baseline Rd to Highland Ave	3,030	15.4	B	4,060	20.8	C	3,020	15.4	B	4,110	21.2	C

Indicates that the LOS exceeds the target level
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15-AM-2: Year 2022 plus Phase 1 Freeway Mainline Levels of Service (Southbound/Westbound)

ID	Freeway	Segment	2022 No Project						2022 Plus Phase 1					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-2	SR-60	Reservoir St to Ramona Ave	8,770	43.3	E	7,150	30.1	D	8,690	43.0	E	7,260	31.0	D
F-3	SR-60	Ramona Ave to Central Ave	8,290	38.7	E	6,750	27.7	D	8,210	38.3	E	6,860	28.5	D
F-4	SR-60	Central Ave to Mountain Ave	6,340	25.0	C	6,990	32.0	D	6,260	25.2	C	7,100	30.0	D
F-5	SR-60	Mountain Ave to Euclid Ave	6,260	25.0	C	7,440	32.0	D	6,190	24.8	C	7,560	33.1	D
F-6	SR-60	Euclid Ave to Grove Ave	6,470	26.1	D	7,310	31.1	D	6,390	25.9	C	7,420	32.1	D
F-7	SR-60	Grove Ave to Vineyard Ave	6,330	25.4	C	7,920	35.5	E	6,250	25.1	C	8,060	37.0	E
F-8	SR-60	Vineyard Ave to Archibald Ave	7,670	33.6	D	7,550	32.8	D	7,580	33.2	D	7,680	34.0	D
F-9	SR-60	Archibald Ave to Haven Ave	See Weaving Analysis						See Weaving Analysis					
F-10	SR-60	Haven Ave to Milliken Ave	5,850	18.0	B	7,110	22.3	C	5,740	17.7	B	7,270	23.0	C
F-11	SR-60	Milliken Ave to I-15	5,550	21.6	C	7,050	29.2	D	5,430	21.2	C	7,230	30.6	D
F-12	SR-60	I-15 to Eiwanda Ave/Van Buren Blvd	4,490	13.7	B	5,850	17.9	B	4,360	13.4	B	6,080	18.7	C
F-13	SR-60	Eiwanda Ave/Van Buren Blvd to Mission Blvd/Country Village Rd	4,220	16.2	B	5,830	22.8	C	4,110	15.9	B	6,050	24.0	C
F-14	SR-60	Mission Blvd/Country Village Rd to Pedley Rd	4,240	16.3	B	5,850	22.9	C	4,130	15.9	B	6,130	24.4	C
F-15	SR-60	Pedley Rd to Pyrite St	3,290	12.6	B	5,010	19.2	C	3,150	12.2	B	5,260	20.5	C
F-16	SR-60	Pyrite St to Valley Way	2,740	10.6	A	4,510	17.2	B	2,620	10.2	A	4,740	18.3	C
F-17	SR-60	Valley Way to Rubidoux Blvd	4,630	24.4	C	6,530	42.2	E	4,510	23.9	C	6,810	46.9	F
F-18	SR-60	Rubidoux Blvd to Market St	3,630	18.6	C	5,660	32.5	D	3,520	18.2	C	5,940	36.5	E
F-19	SR-60	Market St to Main St	5,860	34.4	D	6,820	46.5	F	5,680	32.9	D	7,080	51.8	F
F-20	SR-60	Main St to SR-91	5,450	30.6	D	6,610	42.9	E	5,290	29.7	D	6,880	48.0	F
F-24	SR-60	Marlin Luther King Blvd to Central Ave	7,060	23.7	C	7,680	25.5	C	7,000	24.3	C	8,050	28.7	D
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	7,390	31.9	D	8,510	40.3	E	7,310	31.8	D	8,900	45.8	F
F-27	SR-60	I-215 to Day St	7,250	54.3	F	3,880	20.0	C	7,210	55.7	F	4,210	22.8	C
F-29	SR-60	Pigeon Pass Rd to Heacock St	3,460	28.5	D	3,860	34.0	D	3,460	29.5	D	4,320	45.2	F
F-30	SR-60	Heacock St to Perris Blvd	3,300	26.6	D	3,360	27.5	D	3,370	28.4	D	3,900	36.7	D
F-31	SR-60	Perris Blvd to Nason St	2,790	21.6	C	2,550	19.6	C	2,900	23.4	C	3,210	27.4	D
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	1,810	13.8	B	1,750	13.4	B	2,060	16.5	B	2,620	21.7	C
F-34	SR-60	Redlands Blvd to Theodore St	2,280	17.3	B	2,200	16.8	B	2,580	20.7	C	2,920	24.2	C
F-36	SR-60	Glenn Springs Rd to Jack Rabbit Trail	2,180	18.0	C	1,880	15.3	B	2,250	20.6	C	1,770	14.6	B
F-37	SR-60	Jack Rabbit Trail to I-10	2,190	16.7	B	1,690	12.9	B	2,290	17.6	B	1,660	12.9	B
F-39	SR-91	I-15 to McKinley St	7,280	30.9	D	7,330	31.0	D	7,230	30.8	D	7,400	31.5	D
F-40	SR-91	McKinley St to Pierce St	5,440	31.0	D	6,330	39.6	E	5,400	30.6	D	6,400	40.9	E
F-41	SR-91	Pierce St to Magnolia Ave	5,210	29.0	D	8,080	77.6	F	5,180	28.8	D	8,150	80.4	F
F-42	SR-91	Magnolia Ave to La Sierra Ave	5,450	31.1	D	8,040	76.1	F	5,410	30.7	D	8,120	80.9	F
F-43	SR-91	La Sierra Ave to Tyler St	4,800	25.9	C	5,980	35.6	E	4,760	25.8	C	6,050	36.7	E
F-44	SR-91	Tyler St to Van Buren Blvd	6,170	24.7	C	7,420	31.6	D	6,170	24.7	C	7,490	32.3	D
F-45	SR-91	Van Buren Blvd to Adam St	5,510	22.9	C	7,160	29.9	D	5,610	22.9	C	7,230	30.6	D
F-46	SR-91	Adam St to Madison St	5,420	21.2	C	6,210	24.5	C	5,420	21.2	C	6,280	25.0	C
F-47	SR-91	Madison St to Arlington Ave	4,780	25.8	C	5,550	31.2	D	4,790	26.0	D	5,610	32.0	D
F-49	SR-91	Central Ave to 14th St	4,340	16.8	B	4,530	17.3	B	4,310	16.7	B	4,570	17.6	B
F-51	SR-91	University Ave to Spruce St	See Weaving Analysis						See Weaving Analysis					
F-52	I-10	SR-60 to Beaumont Ave	5,510	21.9	C	5,370	20.7	C	5,620	21.9	C	5,380	20.9	C
F-53	I-10	Beaumont Ave to Pennsylvania Ave	5,470	21.3	C	5,270	20.3	C	5,510	21.5	C	5,260	20.4	C

Table 4.15-AM-2: Year 2022 plus Phase 1 Freeway Mainline Levels of Service (Southbound/Westbound)

ID	Freeway	Segment	2022 No Project				2022 Plus Phase 1							
			AM Peak Hour Freeway Volume	Density (pc/mi/ln)	LOS	PM Peak Hour Freeway Volume	Density (pc/mi/ln)	LOS	AM Peak Hour Freeway Volume	Density (pc/mi/ln)	LOS	PM Peak Hour Freeway Volume	Density (pc/mi/ln)	LOS
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	5,920	23.3	C	5,480	21.2	C	5,960	23.5	C	5,430	21.1	C
F-55	I-10	Highland Springs Ave to Sunset Ave	5,690	22.3	C	5,200	20.1	C	5,740	22.6	C	5,180	20.0	C
F-56	I-10	Sunset Ave to 22nd St	5,450	21.2	C	5,090	19.7	C	5,490	21.5	C	5,080	19.6	C
F-57	I-10	22nd St to 8th St	5,320	20.6	C	5,110	19.6	C	5,370	20.9	C	5,110	19.7	C
F-58	I-10	8th St to S Hargrave St	5,250	20.3	C	5,250	20.2	C	5,300	20.6	C	5,230	20.2	C
F-59	I-10	Hargrave St to Field Rd	4,510	18.5	C	5,020	19.3	C	4,860	18.8	C	4,960	19.2	C
F-60	I-10	Fields Rd to Morongo Tr	4,600	17.7	B	4,830	18.6	C	4,650	18.0	B	4,790	18.4	C
F-61	I-10	Morongo Tr to Main St	4,110	15.8	B	4,240	16.3	B	4,170	16.1	B	4,210	16.2	B
F-62	I-10	Main St to Haugen-Lehmann Way	4,230	16.3	B	4,300	16.5	B	4,290	16.6	B	4,270	16.4	B
F-64	I-10	SR-111 to Tipton Rd	3,680	14.1	B	3,760	14.4	B	3,740	14.4	B	3,750	14.4	B
F-65	I-10	Tipton Rd to SR-62	3,700	14.2	B	3,770	14.4	B	3,760	14.5	B	3,750	14.4	B
F-66	I-215	Scott Rd to Newport Rd	3,670	18.6	C	2,500	12.7	B	3,640	18.5	C	2,520	12.8	B
F-68	I-215	Newport Rd to McCall Blvd	3,820	19.6	C	3,520	18.0	B	3,790	19.4	C	3,520	18.0	B
F-69	I-215	McCall Blvd to Ethanac Rd	4,380	22.8	C	2,950	15.0	B	4,360	22.7	C	2,940	15.0	B
F-70	I-215	Ethanac Rd to SR-74	4,110	21.2	C	4,250	21.9	C	4,100	21.1	C	4,250	22.0	C
F-71	I-215	SR-74 to Redlands Ave	5,730	33.1	D	3,860	19.7	C	5,730	33.1	D	3,870	19.8	C
F-74	I-215	Columbia Ave to Center St	6,390	40.0	E	5,330	29.6	D	6,420	40.8	E	5,310	29.4	D
F-75	I-215	Center St to La Cadena Dr	6,880	46.9	F	5,560	31.6	D	6,920	48.1	F	5,540	31.4	D
F-76	I-215	La Cadena Dr to Barton Rd	6,700	44.2	E	5,570	31.7	D	6,750	45.4	F	5,550	31.5	D
F-77	I-215	Barton Rd to Mt. Vernon Ave	6,720	44.4	E	5,610	32.0	D	6,770	45.7	F	5,560	31.7	D
F-78	I-215	Mt. Vernon Ave to I-10	7,080	29.2	D	5,890	23.1	C	7,150	29.9	D	5,870	23.0	C
F-80	I-215	Auto Plaza Dr to Mill St	4,790	18.2	C	4,140	15.8	B	4,810	18.4	C	4,120	15.8	B
F-83	I-215	Baseline Rd to Highland Ave	5,280	29.0	D	4,700	24.9	C	5,330	29.6	D	4,700	24.9	C

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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- I-215 Iowa Avenue/La Cadena Drive to Barton Road; and
- I-215 Barton Road to Mt. Vernon Avenue.
- Southbound or Westbound Sections:
 - SR-60 Grove Avenue to Vineyard Avenue;
 - SR-60 Valley Way to Rubidoux Boulevard;
 - SR-60 Market Street to Main Street;
 - SR-60 Main Street to SR-91;
 - SR-60 Fair Isle Drive/Box Springs Road to I-215;
 - SR-60 I-215 to Day Street;
 - SR-91 McKinley Street to Pierce Street;
 - SR-91 Pierce Street to Magnolia Avenue;
 - SR-91 Magnolia Avenue to La Sierra Avenue;
 - SR-91 La Sierra Avenue to Tyler Street;
 - I-215 Columbia Avenue to Center Street;
 - I-215 Center Street to Iowa Avenue/La Cadena Drive;
 - I-215 Iowa Avenue/La Cadena Drive to Barton Road; and
 - I-215 Barton Road to Mt. Vernon Avenue.

Phase 1 of the project would create a significant cumulative impact at the following four freeway segments under year 2022 with Phase 1 conditions:

- Northbound or Eastbound Section:
 - SR-91 Central Avenue to 14th Street.
- Southbound or Westbound Sections:
 - SR-60 Rubidoux Boulevard to Market Street;
 - SR-60 Pigeon Pass Road/Frederick Street to Heacock Street; and
 - SR-60 Heacock Street to Perris Boulevard.

Freeway Weaving Analysis. Year 2022 with Phase 1 freeway weaving segment levels of service for the study area intersections are summarized in Table 4.15.AN-1 and 4.15.AN-2, which shows 10 freeway weaving segments would operate at unsatisfactory levels of service. Phase 1 of the project would contribute toward the worsening of an already unsatisfactory LOS at seven of the freeway weaving segments and, therefore, would have a cumulative impact at these locations. Phase 1 of the project would have a significant direct project impact at three freeway weaving segments under year 2022 with Phase 1 conditions.

Phase 1 of the project would have a cumulative impact at the following seven freeway weaving segments under year 2022 with Phase 1 conditions:

- Northbound or Eastbound:

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- SR-60 SR-71/S. Garey Avenue to Reservoir Street;
- SR-60 Main Street to SR-91;
- SR-60 SR-91 to W. Blaine Street/3rd Street;
- SR-60 Central Avenue to Fair Isle Drive/Box Springs Road;
- SR-91 Arlington Avenue to Central Avenue; and
- I-215 SR-60 to Columbia Avenue.
- Southbound or Westbound:
 - SR-60 SR-91 to W. Blaine Street/3rd Street;

Phase 1 of the project would also create a significant cumulative impact at the following three freeway weaving segments under year 2022 with Phase 1 conditions:

- Southbound or Westbound:
 - SR-60 Blaine Street/3rd Street to University Avenue;
 - SR-60 Central Avenue to Fair Isle Drive/Box Springs Road.
 - SR-60 Day Street to Pigeon Pass Road/Frederick Street.

Freeway Ramp Analysis: Year 2022 with Phase 1 freeway ramp merge/diverge levels of service are summarized in Table 4.15.AO, which shows one freeway ramp that would operate at unsatisfactory level of service. Phase 1 of the project would contribute toward the worsening of an unsatisfactory LOS at this freeway ramp and, therefore, would have a significant cumulative impact on the following ramp:

- SR-60 Eastbound On-Ramp from Central Avenue.

Phase 1 of the project would not create a significant cumulative impact to any freeway ramps in the year 2022 plus Phase 1 condition.

Table 4.15-AN-1: Year 2022 plus Phase 1 Weaving Segment Levels of Service (Northbound/Eastbound)

ID	Freeway	Weaving Segment	2022 No-Project Conditions						2022 Plus Phase 1 Conditions					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
W-1	SR-60	SR-71/Garey Ave to Reservoir St	7,150	29.2	D	8,640	37.6	E	7,340	30.5	D	8,620	37.7	E
W-9	SR-60	Haven Ave to Archibald Ave	See Basic Analysis						See Basic Analysis					
W-20	SR-60	Main St to SR-91	7,350	36.6	E	7,370	38.0	E	7,620	38.5	E	7,380	38.2	E
W-21	SR-60	SR-91 to Blaine St/3 rd St	6,010	24.2	C	9,760	42.3	E	6,440	26.7	C	9,720	42.6	E
W-22	SR-60	Blaine St/3 rd St to University Ave	5,710	21.6	C	7,210	31.3	D	6,140	25.0	C	7,250	32.5	D
W-23	SR-60	University Ave to Martin Luther King Blvd	6,620	23.8	C	6,060	21.4	C	7,140	26.3	C	6,130	22.0	C
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs Rd	6,580	27.3	C	8,400	38.9	E	7,240	32.8	D	8,360	39.7	E
W-27	SR-60	I-215 to Day St	4,000	14.6	B	5,280	19.9	B	4,650	19.0	B	5,320	21.1	C
W-28	SR-60	Pigeon Pass Rd/Frederick St	3,890	16.6	B	5,130	23.2	C	4,350	19.3	B	5,120	23.6	C
W-32	SR-60	Moreno Beach Dr to Nason St	2,330	14.2	B	2,880	18.1	B	2,980	19.1	B	2,940	19.0	B
W-35	SR-60	Theodore St to Gilman Springs Rd	2,320	12.7	B	3,370	19.3	B	2,350	13.5	B	3,280	19.4	B
W-42	SR-91	Magnolia Ave to La Sierra Ave	6,400	30.3	D	5,950	28.5	D	6,550	31.1	D	5,920	28.5	D
W-48	SR-91	Arlington Ave to Central Ave	7,220	39.0	E	3,680	17.9	B	7,300	39.9	E	3,660	17.8	B
W-50	SR-91	14 th St to University Ave	5,030	25.1	C	4,810	24.6	C	5,100	25.7	C	4,840	24.9	C
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	See Basic Analysis						See Basic Analysis					
W-63	I-10	Haugen-Lehmann Way to SR-111	3,300	11.0	B	4,710	15.9	B	3,260	10.9	B	4,760	16.1	B
W-73	I-215	SR-60 to Columbia Ave	6,840	37.8	E	6,540	35.8	E	6,810	37.7	E	6,580	36.4	E
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,610	16.8	B	5,210	19.0	B	4,590	16.8	B	5,250	19.3	B
W-81	I-215	Mill St to 2 nd St	5,090	17.8	B	5,910	21.1	C	5,070	17.7	B	5,940	21.3	C
W-82	I-215	5 th St to Baseline Rd	3,760	12.7	B	4,450	15.2	B	3,750	12.7	B	4,490	15.4	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15-AN-2: Year 2022 plus Phase 1 Weaving Segment Levels of Service (Southbound/Westbound)

ID	Freeway	Weaving Segment	2022 No-Project Conditions						2022 Plus Phase 1 Conditions					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
W-1	SR-60	SR-71/Garey Ave to Reservoir St	6,130	21.9	C	6,720	24.3	C	6,060	21.7	C	6,850	25.0	C
W-9	SR-60	Haven Ave to Archibald Ave	6,330	24.4	C	7,330	29.3	C	6,230	24.1	C	7,480	30.1	D
W-20	SR-60	Main St to SR-91	See Basic Analysis						See Basic Analysis					
W-21	SR-60	SR-91 to Blaine St/3 rd St	7,720	29.4	D	9,290	36.9	E	7,640	29.4	D	9,670	39.1	E
W-22	SR-60	Blaine St/3 rd St to University Ave	5,700	21.1	C	8,280	32.0	D	5,620	21.3	C	8,670	35.2	E
W-23	SR-60	University Ave to Martin Luther King Blvd	5,600	22.6	C	7,620	30.7	D	5,500	22.3	C	7,980	32.8	D
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs Rd	7,110	30.7	D	7,890	32.7	D	7,120	31.3	D	8,330	36.1	E
W-27	SR-60	I-215 to Day St	See Basic Analysis						See Basic Analysis					
W-28	SR-60	Pigeon Pass Rd/Frederick St	4,970	34.3	D	4,860	32.7	D	4,950	34.7	D	5,270	37.1	E
W-32	SR-60	Moreno Beach Dr to Nason St	2,410	14.5	B	2,190	13.2	B	2,560	15.8	B	2,840	18.2	B
W-35	SR-60	Theodore St to Gilman Springs Rd	2,360	13.6	B	2,030	11.4	B	2,310	13.5	B	1,980	11.8	B
W-42	SR-91	Magnolia Ave to La Sierra Ave	See Basic Analysis						See Basic Analysis					
W-48	SR-91	Arlington Ave to Central Ave	4,510	21.2	C	5,050	24.1	C	4,510	21.3	C	5,120	24.6	C

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Table 4.15-AN-2: Year 2022 plus Phase 1 Weaving Segment Levels of Service (Southbound/Westbound)

ID	Freeway	Weaving Segment	2022 No-Project Conditions						2022 Plus Phase 1 Conditions					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
W-50	SR-91	14 th St to University Ave	5,080	19.6	B	7,020	27.9	C	5,070	19.5	B	7,010	28.1	D
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	5,020	14.7	B	8,850	26.7	C	5,010	14.7	B	8,850	26.9	C
W-63	I-10	Haugen-Lehmann Way to SR-111	4,210	14.8	B	4,310	17.2	B	4,280	15.2	B	4,280	17.1	B
W-73	I-215	SR-60 to Columbia Ave	7,040	33.4	D	6,110	28.8	D	7,070	33.7	D	6,070	28.6	D
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	5,830	20.8	C	4,870	18.0	B	5,850	20.9	C	4,830	17.9	B
W-81	I-215	Mill St to 2 nd St	5,300	19.0	B	4,410	15.9	B	5,330	19.2	B	4,390	15.8	B
W-82	I-215	5 th St to Baseline Rd	4,540	16.0	B	3,490	12.3	B	4,570	16.1	B	3,470	12.2	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15-AO: Year 2022 plus Phase 1 Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp Segment	Ramp No. of Lanes	2022 No-Project Conditions						2022 Plus Phase 1 Conditions									
				AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour						
				Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS
R-1	SR-60 EB	On-Ramp from Martin Luther King Blvd	1	6,190	710	27.4	C	5,780	1,320	30.9	D	6,710	740	29.7	D	5,840	1,340	31.5	D
R-2	SR-60 EB	On-Ramp from Central Ave	1	8,170	710	28.8	D	9,010	1,120	35.1	F	8,700	820	31.9	F	9,080	1,120	35.6	F
R-3	SR-60 EB	Off-Ramp to Redlands Blvd	1	1,910	220	8.3	A	2,370	520	12.5	B	2,780	430	18.2	B	2,540	560	15.4	B
R-4	SR-60 EB	Loop On-Ramp from Redlands Blvd	1	1,690	90	17.1	B	1,850	210	19.4	B	2,350	90	24.1	C	1,980	250	21.7	C
R-5	SR-60 EB	Direct On-Ramp from Redlands Blvd	0	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			
R-6	SR-60 EB	Off-Ramp to Theodore St	2	2,460	250	24.5	C	3,240	150	31.7	D	3,300	910	21.9	C	3,350	540	21.8	C
R-7	SR-60 EB	Loop On-Ramp from Theodore St	1	2,210	110	23.1	C	3,090	270	31.7	D	2,390	40	25.4	C	2,810	70	28.8	D
R-8	SR-60 EB	Direct On-Ramp from Theodore St	1	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario			
R-9	SR-60 EB	Off-Ramp to Gilman Springs Rd	2	2,320	330	14.5	B	3,370	650	21.0	C	2,350	432	14.9	B	3,280	537	20.7	C
R-10	SR-60 EB	On-Ramp from Gilman Springs Rd	1	1,990	270	14.7	B	2,720	140	19.8	B	1,918	288	14.5	B	2,743	211	20.8	C
R-11	SR-60 WB	Off-Ramp to Gilman Springs Rd	2	2,210	230	13.8	B	1,880	190	11.8	B	2,250	326	14.7	B	1,770	233	11.7	B
R-12	SR-60 WB	On-Ramp from Gilman Springs Rd	1	1,980	380	15.5	B	1,690	310	12.6	B	1,924	406	16.2	B	1,537	452	13.5	B

Table 4.15.AO: Year 2022 plus Phase 1 Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp Segment	Ramp No. of Lanes	2022 No-Project Conditions						2022 Plus Phase 1 Conditions									
				AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour						
				Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS
R-13	SR-60 WB	Off-Ramp to Theodore St	2	2,360	180	12.4	B	2,030	120	9.3	A	2,310	310	14.6	B	1,980	170	12.6	B
R-14	SR-60 WB	On-Ramp from Theodore St	1	2,180	100	21.0	C	1,910	290	20.2	C	2,000	560	24.1	C	1,810	790	24.7	C
R-15	SR-60 WB	Off-Ramp to Redlands Blvd	1	2,280	170	22.9	C	2,200	100	22.3	C	2,580	250	26.7	C	2,920	160	30.2	D
R-16	SR-60 WB	Loop On-Ramp from Redlands Blvd	1	2,110	440	23.3	C	2,100	380	22.8	C	2,330	470	26.3	C	2,760	700	32.3	D
R-17	SR-60 WB	Direct On-Ramp from Redlands Blvd	0	Does not Exist in this Scenario			Does not Exist in this Scenario	Does not Exist in this Scenario			Does not Exist in this Scenario			Does not Exist in this Scenario					
R-18	SR-60 WB	Off-Ramp to Central Ave	2	7,110	410	26.5	C	7,890	530	29.8	D	7,120	480	27.3	C	8,330	540	31.8	D
R-19	SR-60 WB	Off-Ramp to Martin Luther King Blvd	1	7,060	510	16.3	B	7,680	430	17.6	B	7,000	520	16.4	B	8,050	430	19.2	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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4.15.6.4 Year 2035 Cumulative With Project Conditions Traffic and Level of Service Impacts

Threshold: Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit.

Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

A significant project-specific traffic impact would occur if the project would cause a decrease from satisfactory LOS (based on local agency adopted standards) to an unsatisfactory LOS on a study area intersection, roadway segment, freeway mainline lane, freeway weaving segment or freeway ramp. A significant cumulative traffic impact would occur if the project contributes traffic toward those facilities operating at unsatisfactory LOS in the pre-project condition. The adopted LOS standards are as follows:

- Roadway segments: LOS C and LOS D as outlined in previously referenced Tables 4.15.B and 4.15.C.
- Intersections: LOS C and LOS D as outlined in previously referenced Table 4.15.Z.
- Freeway mainline: LOS D.
- Freeway Ramp Merge/Diverge: LOS D.

Intersection Analysis. Year 2035 Cumulative with project (buildout) intersection levels of service for the study area intersections are summarized in Tables 4.15.AP-1 and 4.15.AP-2, which shows 35 intersections that would operate at unsatisfactory levels of service. The project would contribute toward the worsening of an already unsatisfactory LOS at 30 intersections and, therefore, have a significant cumulative impact. At five intersections, the project would create a significant cumulative impact since the project would cause a decrease in the LOS from satisfactory to unsatisfactory.

The project would contribute to a significant cumulative impact at the following 30 intersections under Year 2035 with project conditions:

- Theodore Street/Ironwood Avenue;
- Moreno Beach Drive/Locust Avenue;
- Moreno Beach Drive/SR-60 Eastbound Ramps;
- Iris Avenue/Perris Boulevard;
- Kitching Street/Iris Avenue;
- Lasselle Street/Iris Avenue;
- Lasselle Street/Cactus Avenue;
- Graham Street/Alessandro Boulevard;
- Alessandro Boulevard/Sycamore Canyon Boulevard;I-215 Southbound Ramps/Cactus Avenue;
- Central Avenue/Lochmoor Drive;

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Table 4.15.AP-1: Year 2035 Cumulative plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-1	Theodore St/Street F	D	N/A	Non-Existent		RABT	10.2	B
IN-2	Cactus Avenue Extension/Street E	D	N/A	Non-Existent		Signal	12.3	B
IN-3	Theodore Ave/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	20.9	C	RABT	11.0	B
IN-4	Alessandro Blvd (Street C)/Street F	D	N/A	Non-Existent		RABT	7.9	A
IN-6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	Signal	11.7	B	Signal	44.3	D
IN-9	Gilman Springs Rd/Eucalyptus Ave	D	N/A	Non-Existent		Signal	10.5	B
IN-10	Redlands Blvd/Locust Ave	C	Signal	5.4	A	Signal	10.7	B
IN-11	Redlands Blvd/Ironwood Ave	D	Signal	45.0	D	Signal	46.4	D
IN-12	Theodore Street/Ironwood Avenue	D	CSS	22.9	C	CSS	44.3	E
IN-13	Redlands Blvd/SR-60 WB ramps	D	Signal	5.7	A	Signal	6.7	A
IN-14	Redlands Blvd/SR-60 EB ramps	D	Signal	5.1	A	Signal	5.4	A
IN-15	Theodore Str/SR-60 WB ramps	D	CSS	62.2	F	Signal	14.1	B
IN-16	Theodore Str/SR-60 EB ramps	D	CSS	13.5	B	Signal	2.2	A
IN-17	Quincy Str/Fir Ave	D	CSS	9.6	A	CSS	10.6	B
IN-18	Redlands Blvd/Eucalyptus Ave (Fir)	D	Signal	7.2	A	Signal	21.8	C
IN-19	Theodore St/Fir Ave (Eucalyptus)	D	CSS	10.5	B	Signal	18.5	B
IN-20	Oliver Str/Alessandro Blvd	C	CSS	20.0	C	CSS	21.0	C
IN-21	Moreno Beach Dr/Alessandro Blvd	D	Signal	17.3	B	Signal	17.4	B
IN-22	Quincy Str/Alessandro Blvd	C	Signal	4.2	A	Signal	4.2	A
IN-23	Redlands Blvd/Alessandro Blvd	C	AWS	137.4	F	AWS	13.4	B
IN-24	Oliver Str/Cactus Ave	D	Signal	22.3	C	Signal	23.9	C
IN-25	Moreno Beach Dr/Cactus Ave	C	Signal	20.3	C	Signal	22.0	C
IN-26	Quincy Str/Cactus Ave	C	Signal	3.9	A	Signal	3.5	A
IN-27	Redlands Blvd/Cactus Ave	C	AWS	14.3	B	AWS	128.4	F
IN-28	Moreno Beach Dr/John Kennedy Dr	D	Signal	23.5	C	Signal	29.1	C
IN-29	Heacock Str/Ironwood Ave	D	Signal	31.6	C	Signal	31.6	C
IN-30	Heacock Str/SR-60 WB Ramps	D	Signal	30.5	C	Signal	31.4	C
IN-31	Heacock St/SR-60 EB Ramps	D	Signal	12.3	B	Signal	12.7	B
IN-32	Sunnymead Blvd & Perris Blvd	D	Signal	31.8	C	Signal	32.1	C
IN-33	Perris Blvd/SR-60 WB Ramps	D	Signal	22.5	C	Signal	24.0	C
IN-34	Perris Blvd/Eucalyptus Ave	D	Signal	21.8	C	Signal	21.5	C
IN-35	Moreno Beach Dr/Locust Ave	C	CSS	29.4	D	CSS	31.0	D
IN-36	Moreno Beach Drive & Ironwood Avenue	D	Signal	46.6	D	Signal	52.9	D
IN-37	Moreno Beach Dr/SR-60 EB Ramps	D	Signal	113.9	F	Signal	147.6	F
IN-38	Perris Blvd/John F. Kennedy Dr	D	Signal	28.8	C	Signal	33.5	C
IN-39	Iris Ave/Perris Blvd	D	Signal	58.6	E	Signal	65.7	E
IN-40	Kitching St/Iris Ave	C	Signal	65.8	E	Signal	78.3	E
IN-41	Lasselle Str/Iris Ave	D	Signal	35.0	C	Signal	38.7	D
IN-42	Nason Str/Iris Ave	C	Signal	18.5	B	Signal	17.1	B
IN-43	Oliver Str/Iris Ave	D	Signal	24.5	C	Signal	23.7	C

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Table 4.15.AP-1: Year 2035 Cumulative plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-44	Via Dell Lago/Iris Ave	C	Signal	7.0	A	Signal	6.8	A
IN-45	Krameria Ave/Perris Blvd	D	Signal	27.8	C	Signal	29.1	C
IN-46	Kitching Str/Krameria Ave	D	Signal	35.3	D	Signal	37.4	D
IN-47	Lasselle Str/Krameria Ave	D	Signal	32.2	C	Signal	34.4	C
IN-48	Kitching Str/Alessandro Blvd	D	Signal	26.5	C	Signal	26.7	C
IN-49	Lasselle Str/Alessandro Blvd	D	Signal	19.8	B	Signal	20.5	C
IN-50	Morrison Str/Alessandro Blvd	D	Signal	25.5	C	Signal	25.6	C
IN-51	Nason Str/Alessandro Blvd	D	Signal	31.1	C	Signal	31.3	C
IN-52	Kitching Str/Cactus Ave	C	Signal	30.7	C	Signal	30.5	C
IN-53	Lasselle Str/Cactus Ave	C	Signal	38.5	D	Signal	38.8	D
IN-54	Morrison Str/Cactus Ave	D	Signal	6.1	A	Signal	6.4	A
IN-55	Nason Str/Cactus Ave	D	Signal	36.1	D	Signal	36.6	D
IN-56	Frederick Str/Alessandro Blvd	D	Signal	19.2	B	Signal	19.3	B
IN-57	Graham Str/Alessandro Blvd	D	Signal	35.6	D	Signal	35.6	D
IN-58	Heacock Str/Alessandro Blvd	D	Signal	29.6	D	Signal	29.2	C
IN-59	Indian Str/Alessandro Blvd	D	Signal	21.7	C	Signal	21.3	C
IN-60	Perris Blvd/Alessandro Blvd	D	Signal	32.8	C	Signal	33.6	C
IN-61	Frederick Str/Cactus Ave	D	Signal	9.7	A	Signal	9.6	A
IN-62	Graham Str/Cactus Ave	D	Signal	22.7	C	Signal	23.4	C
IN-63	Heacock Str/Cactus Ave	D	Signal	31.6	C	Signal	31.9	C
IN-64	Indian Str/Cactus Ave	C	Signal	32.6	C	Signal	32.6	C
IN-65	Perris Blvd/Cactus Ave	D	Signal	39.2	D	Signal	38.8	D
IN-66	Alessandro Blvd/Sycamore Canyon Blvd	D	Signal	37.5	D	Signal	39.7	D
IN-67	I-215 SB Ramps/Alessandro Blvd	D	Signal	6.6	A	Signal	6.7	A
IN-68	I-215 NB Ramps/Alessandro Blvd	D	Signal	21.9	C	Signal	21.8	C
IN-69	Old 215 Frontage Rd/Alessandro Blvd	D	Signal	15.1	B	Signal	15.0	B
IN-70	Day Str/Alessandro Blvd	D	Signal	22.6	C	Signal	23.4	C
IN-71	Elsworth Str/Alessandro Blvd	D	Signal	28.4	C	Signal	29.5	C
IN-72	I-215 SB Ramps/Cactus Ave	D	Signal	37.6	D	Signal	41.6	D
IN-73	I-215 NB Ramps/Cactus Ave	D	Signal	71.1	E	Signal	75.5	E
IN-74	Elsworth Str/Cactus Ave	D	Signal	> 180.0	F	Signal	> 180.0	F
IN-75	Central Ave/Lochmoor Dr.	D	Signal	16.2	B	Signal	18.5	B
IN-76	Sycamore Canyon Blvd/Central Ave	D	Signal	28.6	C	Signal	29.9	C
IN-77	SR-60 EB Ramps/Central Ave	D	Signal	18.1	B	Signal	23.1	C
IN-78	SR-60 WB Ramps/Central Ave	D	Signal	6.7	A	Signal	6.7	A
IN-79	Alessandro Blvd/Trautwein Rd.	D	Signal	32.2	C	Signal	34.3	C
IN-80	Alessandro Blvd/Mission Grove Pkwy	D	Signal	28.0	C	Signal	29.6	C
IN-81	Martin Luther King Blvd/Chicago Ave	D	Signal	27.0	C	Signal	28.2	C
IN-82	Martin Luther King Blvd/Iowa Ave	D	Signal	11.3	B	Signal	11.3	B
IN-83	Martin Luther King Blvd/Canyon Crest Dr	D	Signal	40.2	D	Signal	43.2	D

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Table 4.15.AP-1: Year 2035 Cumulative plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-84	Martin Luther King Blvd/I-215 SB Ramps	D	Signal	11.2	B	Signal	11.6	B
IN-85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	45.1	E	AWS	48.5	E
IN-86	Central Ave/Chicago Ave	D	Signal	46.8	D	Signal	60.7	E
IN-87	Central Ave/El Cerrito Dr	D	Signal	17.6	B	Signal	17.8	B
IN-88	Central Ave/Canyon Crest Dr	D	Signal	45.4	D	Signal	49.7	D
IN-89	Chicago Ave/Country Club Dr	D	Signal	11.2	B	Signal	11.7	B
IN-90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	Signal	38.4	D	Signal	39.4	D
IN-91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	Signal	20.5	C	Signal	20.8	C
IN-92	Arlington Ave/Maude St	D	Signal	14.1	B	Signal	14.3	B
IN-93	Horace St/Arlington Ave	D	Signal	37.4	D	Signal	38.8	D
IN-94	Arlington Ave/Victoria Ave	D	Signal	124.5	F	Signal	138.7	F
IN-95	Alessandro Blvd/Chicago Ave	D	Signal	57.4	E	Signal	64.9	E
IN-96	Alessandro Blvd/Century Ave	D	Signal	19.2	B	Signal	19.1	B
IN-97	Alessandro Blvd/Via Vista Dr	D	Signal	17.9	B	Signal	17.9	B
IN-98	Alessandro Blvd/Canyon Crest Dr	D	Signal	56.6	E	Signal	60.6	E
IN-99	Harley Knox Blvd/Perris Blvd	D	Signal	33.5	C	Signal	35.4	D
IN-100	Harley Knox Blvd/Evan Rd	D	Signal	16.1	B	Signal	16.6	B
IN-101	Ramona Expy/Indian St	E	Signal	110.4	F	Signal	112.0	F
IN-102	Ramona Expy/Perris Blvd	E	Signal	49.2	D	Signal	52.3	D
IN-103	Ramona Expy/Evans Rd	E	Signal	60.6	E	Signal	66.1	E
IN-104	Perris Blvd/Morgan St	D	Signal	11.9	B	Signal	11.9	B
IN-105	Evans Rd/Morgan St	C	Signal	28.1	C	Signal	28.1	C
IN-106	Perris Blvd/Rider St	C	Signal	23.4	C	Signal	23.1	C
IN-107	Evans Rd/Rider St	C	Signal	36.3	D	Signal	36.5	D
IN-108	Perris Blvd/Mid-County Pkwy WB Ramps	D	Signal	32.7	C	Signal	33.7	C
IN-109	Perris Blvd/Mid-County Pkwy EB Ramps	D	Signal	28.3	C	Signal	29.8	C
IN-110	Evans Rd/Mid-County Pkwy WB Ramps	D	Signal	25.7	C	Signal	25.6	C
IN-111	Evans Rd/Mid-County Pkwy EB Ramps	D	Signal	18.1	B	Signal	18.1	B
IN-112	Placentia Ave/Perris Blvd	D	Signal	29.3	C	Signal	29.3	C
IN-113	Evans Rd/Placentia Ave	D	Signal	7.3	A	Signal	7.2	A
IN-114	Evans Rd/Orange Ave	C	Signal	25.5	C	Signal	25.4	C
IN-115	Evans Rd/Nuevo Rd	C	Signal	31.8	C	Signal	31.9	C
IN-116	Evans Rd/Ellis Ave	D	Signal	12.7	B	Signal	13.5	B
IN-117	Ellis Ave/I-215 SB Ramps	E	Signal	26.5	C	Signal	26.2	C
IN-118	Ellis Ave/SR-215 NB Ramps	E	Signal	22.2	C	Signal	21.9	C
IN-119	Evans Rd/San Jacinto Ave	D	Signal	21.1	C	Signal	21.5	C

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Table 4.15.AP-1: Year 2035 Cumulative plus Project Intersection Levels of Service (A.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-120	Park Center Blvd/Ramona Expy WB Ramps	D	CSS	11.8	B	CSS	13.3	B
IN-121	Park Center Blvd/Ramona Expy EB Ramps	D	CSS	11.6	B	CSS	13.5	B
IN-122	Bridge St/Ramona Expy	N/A	N/A	Non-Existent		N/A	Non-Existent	
IN-123	Gilman Springs Rd/Bridge Str	C	CSS	> 180.0	F	CSS	> 180.0	F
IN-124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	> 180.0	F	CSS	> 180.0	F
IN-125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	> 180.0	F	CSS	> 180.0	F
IN-126	Ramona Expy/Sanderson Ave	D	Signal	43.9	D	Signal	48.4	D
IN-127	Potrero Blvd/SR-60 WB Ramps	D	Signal	21.3	C	Signal	27.0	C
IN-128	Potrero Blvd/SR-60 EB Ramps	D	Signal	20.3	C	Signal	21.1	C
IN-129	W 6th St/California Ave	C	AWS	146.4	F	AWS	148.1	F
IN-130	W 6th St/Beaumont Ave	C	Signal	35.5	D	Signal	36.7	D
IN-131	Reche Canyon Rd/Reche Vista Dr	C	Signal	42.2	D	Signal	47.0	D
IN-132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	26.4	D	AWS	40.8	E
IN-133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	127.6	F	AWS	> 180.0	F
IN-134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	140.5	F	AWS	> 180.0	F
IN-135	W Crescent Ave/Alessandro Rd	C	CSS	17.6	C	CSS	19.9	C
IN-136	W Sunset Dr/Alessandro Rd	C	AWS	10.2	B	AWS	10.7	B

Notes:

"NB" and "SB" denote northbound and southbound respectively

"EB" and "WB" denote eastbound and westbound respectively

"LT" and "RT" denote left turn and right turn respectively

Indicates LOS exceeds the target level

"CSS" means cross-street is stop-controlled

"AWS" means all-way stop

"RABT" means roundabout

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15.AP-2: Year 2035 Cumulative plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-1	Theodore St/Street F	D	N/A	Non-Existent		RABT	53.0	D
IN-2	Cactus Ave Extension/Street E	D	N/A	Non-Existent		Signal	15.2	B
IN-3	Theodore St/Alessandro Blvd (Str A/Str C/Str E)	D	CSS	19.6	C	RABT	11.3	B
IN-4	Alessandro Blvd (Street C)/Street F	D	N/A	Non-Existent		RABT	8.0	A
IN-6	Alessandro Blvd (Street C)/Gilman Springs Rd	D	Signal	37.7	D	Signal	36.7	D
IN-9	Gilman Springs Rd/Eucalyptus Ave	D	N/A	Non-Existent		Signal	14.3	B
IN-10	Redlands Blvd/Locust Ave	C	Signal	16.6	B	Signal	20.3	C
IN-11	Redlands Blvd/Ironwood Ave	D	Signal	48.2	D	Signal	72.3	E

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Table 4.15.AP-2: Year 2035 Cumulative plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-12	Theodore Street/Ironwood Avenue	D	CSS	> 180.0	F	CSS	> 180.0	F
IN-13	Redlands Blvd/SR-60 WB ramps	D	Signal	7.5	A	Signal	10.9	B
IN-14	Redlands Blvd/SR-60 EB ramps	D	Signal	7.3	A	Signal	10.0	A
IN-15	Theodore Str/SR-60 WB ramps	D	CSS	173.7	F	Signal	17.0	B
IN-16	Theodore Str/SR-60 EB ramps	D	CSS	> 180.0	F	Signal	31.2	C
IN-17	Quincy Str/Fir Ave	D	CSS	12.6	B	CSS	15.7	C
IN-18	Redlands Blvd/Eucalyptus Ave (Fir)	D	Signal	15.6	B	Signal	52.3	D
IN-19	Theodore St/Fir Ave (Eucalyptus)	D	CSS	68.9	F	Signal	54.5	D
IN-20	Oliver Str/Alessandro Blvd	C	CSS	21.6	C	CSS	23.5	C
IN-21	Moreno Beach Dr/Alessandro Blvd	D	Signal	20.2	C	Signal	22.7	C
IN-22	Quincy Str/Alessandro Blvd	C	Signal	3.7	A	Signal	3.7	A
IN-23	Redlands Blvd/Alessandro Blvd	C	AWS	74.7	F	AWS	24.1	C
IN-24	Oliver Str/Cactus Ave	D	Signal	20.2	C	Signal	21.5	C
IN-25	Moreno Beach Dr/Cactus Ave	C	Signal	29.7	C	Signal	37.1	D
IN-26	Quincy Str/Cactus Ave	C	Signal	3.7	A	Signal	3.6	A
IN-27	Redlands Blvd/Cactus Ave	C	AWS	13.5	B	AWS	> 180.0	F
IN-28	Moreno Beach Dr/John Kennedy Dr	D	Signal	16.6	B	Signal	18.5	B
IN-29	Heacock Str/Ironwood Ave	D	Signal	35.2	D	Signal	35.5	D
IN-30	Heacock Str/SR-60 WB Ramps	D	Signal	23.1	C	Signal	24.0	C
IN-31	Heacock St/SR-60 EB Ramps	D	Signal	19.4	B	Signal	20.0	B
IN-32	Sunnymead Blvd & Perris Blvd	D	Signal	39.7	D	Signal	45.3	D
IN-33	Perris Blvd/SR-60 WB Ramps	D	Signal	17.1	B	Signal	19.5	B
IN-34	Perris Blvd/Eucalyptus Ave	D	Signal	24.7	C	Signal	24.6	C
IN-35	Moreno Beach Dr/Locust Ave	C	CSS	37.9	E	CSS	> 180.0	F
IN-36	Moreno Beach Drive & Ironwood Avenue	D	Signal	50.4	D	Signal	61.9	E
IN-37	Moreno Beach Dr/SR-60 EB Ramps	D	Signal	155.8	F	Signal	> 180.0	F
IN-38	Perris Blvd/John F. Kennedy Dr	D	Signal	31.6	C	Signal	37.3	D
IN-39	Iris Ave/Perris Blvd	D	Signal	63.8	E	Signal	80.4	F
IN-40	Kitching St/Iris Ave	C	Signal	126.3	F	Signal	169.8	F
IN-41	Lasselle Str/Iris Ave	D	Signal	79.2	E	Signal	89.5	F
IN-42	Nason Str/Iris Ave	C	Signal	21.7	C	Signal	32.8	C
IN-43	Oliver Str/Iris Ave	D	Signal	25.1	C	Signal	24.9	C
IN-44	Via Dell Lago/Iris Ave	C	Signal	7.2	A	Signal	6.6	A
IN-45	Krameria Ave/Perris Blvd	D	Signal	52.6	D	Signal	53.2	D
IN-46	Kitching Str/Krameria Ave	D	Signal	41.7	D	Signal	52.4	D
IN-47	Lasselle Str/Krameria Ave	D	Signal	14.5	B	Signal	15.8	B
IN-48	Kitching Str/Alessandro Blvd	D	Signal	28.1	C	Signal	29.3	C
IN-49	Lasselle Str/Alessandro Blvd	D	Signal	23.7	C	Signal	24.3	C
IN-50	Morrison Str/Alessandro Blvd	D	Signal	26.2	C	Signal	26.8	C
IN-51	Nason Str/Alessandro Blvd	D	Signal	28.3	C	Signal	29.1	C
IN-52	Kitching Str/Cactus Ave	C	Signal	28.5	C	Signal	28.3	C
IN-53	Lasselle Str/Cactus Ave	C	Signal	34.8	C	Signal	38.2	D
IN-54	Morrison Str/Cactus Ave	D	Signal	8.6	A	Signal	9.7	A
IN-55	Nason Str/Cactus Ave	D	Signal	47.6	D	Signal	51.1	D
IN-56	Frederick Str/Alessandro Blvd	D	Signal	34.5	C	Signal	36.7	D

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Table 4.15.AP-2: Year 2035 Cumulative plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-57	Graham Str/Alessandro Blvd	D	Signal	88.9	F	Signal	93.7	F
IN-58	Heacock Str/Alessandro Blvd	D	Signal	29.5	C	Signal	30.5	C
IN-59	Indian Str/Alessandro Blvd	D	Signal	37.1	D	Signal	36.7	D
IN-60	Perris Blvd/Alessandro Blvd	D	Signal	41.4	D	Signal	44.5	D
IN-61	Frederick Str/Cactus Ave	D	Signal	12.5	B	Signal	13.0	B
IN-62	Graham Str/Cactus Ave	D	Signal	42.1	D	Signal	43.3	D
IN-63	Heacock Str/Cactus Ave	D	Signal	27.2	C	Signal	27.5	C
IN-64	Indian Str/Cactus Ave	C	Signal	36.3	D	Signal	36.3	D
IN-65	Perris Blvd/Cactus Ave	D	Signal	32.5	C	Signal	36.1	D
IN-66	Alessandro Blvd/Sycamore Canyon Blvd	D	Signal	81.2	F	Signal	94.9	F
IN-67	I-215 SB Ramps/Alessandro Blvd	D	Signal	11.5	B	Signal	11.6	B
IN-68	I-215 NB Ramps/Alessandro Blvd	D	Signal	32.8	C	Signal	35.6	D
IN-69	Old 215 Frontage Rd/Alessandro Blvd	D	Signal	16.4	B	Signal	16.5	B
IN-70	Day Str/Alessandro Blvd	D	Signal	28.2	C	Signal	27.8	C
IN-71	Elsworth Str/Alessandro Blvd	D	Signal	52.4	D	Signal	53.6	D
IN-72	I-215 SB Ramps/Cactus Ave	D	Signal	144.8	F	Signal	144.8	F
IN-73	I-215 NB Ramps/Cactus Ave	D	Signal	122.6	F	Signal	133.6	F
IN-74	Elsworth Str/Cactus Ave	D	Signal	> 180	F	Signal	> 180	F
IN-75	Central Ave/Lochmoor Dr.	D	Signal	77.5	E	Signal	104.9	F
IN-76	Sycamore Canyon Blvd/Central Ave	D	Signal	26.8	C	Signal	29.7	C
IN-77	SR-60 EB Ramps/Central Ave	D	Signal	12.4	B	Signal	13.2	B
IN-78	SR-60 WB Ramps/Central Ave	D	Signal	7.0	A	Signal	6.9	A
IN-79	Alessandro Blvd/Trautwein Rd.	D	Signal	16.1	B	Signal	16.2	B
IN-80	Alessandro Blvd/Mission Grove Pkwy	D	Signal	73.7	E	Signal	84.3	F
IN-81	Martin Luther King Blvd/Chicago Ave	D	Signal	41.5	D	Signal	43.5	D
IN-82	Martin Luther King Blvd/Iowa Ave	D	Signal	14.8	B	Signal	15.1	B
IN-83	Martin Luther King Blvd/Canyon Crest Dr	D	Signal	52.4	D	Signal	53.3	D
IN-84	Martin Luther King Blvd/I-215 SB Ramps	D	Signal	12.2	B	Signal	12.5	B
IN-85	Martin Luther King Blvd/I-215 NB Ramps	D	AWS	20.7	C	AWS	22.0	C
IN-86	Central Ave/Chicago Ave	D	Signal	79.0	E	Signal	102.9	F
IN-87	Central Ave/El Cerrito Dr	D	Signal	20.0	B	Signal	20.8	C
IN-88	Central Ave/Canyon Crest Dr	D	Signal	106.3	F	Signal	118.0	F
IN-89	Chicago Ave/Country Club Dr	D	Signal	12.9	B	Signal	14.4	B
IN-90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	Signal	68.0	E	Signal	69.8	E
IN-91	Arlington Ave/Indiana Ave/SR-91 NB Ramps	D	Signal	26.8	C	Signal	29.8	C
IN-92	Arlington Ave/Maude St	D	Signal	10.7	B	Signal	11.2	B
IN-93	Horace St/Arlington Ave	D	Signal	25.5	C	Signal	33.7	C
IN-94	Arlington Ave/Victoria Ave	D	Signal	87.2	E	Signal	97.9	F
IN-95	Alessandro Blvd/Chicago Ave	D	Signal	111.2	F	Signal	123.3	F
IN-96	Alessandro Blvd/Century Ave	D	Signal	11.8	B	Signal	12.3	B

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Table 4.15.AP-2: Year 2035 Cumulative plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-97	Alessandro Blvd/Via Vista Dr	D	Signal	22.2	C	Signal	22.0	C
IN-98	Alessandro Blvd/Canyon Crest Dr	D	Signal	131.0	F	Signal	142.1	F
IN-99	Harley Knox Blvd/Perris Blvd	D	Signal	48.0	D	Signal	51.9	D
IN-100	Harley Knox Blvd/Evan Rd	D	Signal	23.8	C	Signal	24.3	C
IN-101	Ramona Expy/Indian St	E	Signal	> 180.0	F	Signal	> 180.0	F
IN-102	Ramona Expy/Perris Blvd	E	Signal	58.5	E	Signal	60.9	E
IN-103	Ramona Expy/Evans Rd	E	Signal	46.2	D	Signal	49.2	D
IN-104	Perris Blvd/Morgan St	D	Signal	9.9	A	Signal	11.0	B
IN-105	Evans Rd/Morgan St	C	Signal	21.8	C	Signal	21.8	C
IN-106	Perris Blvd/Rider St	C	Signal	30.1	C	Signal	30.6	C
IN-107	Evans Rd/Rider St	C	Signal	34.5	C	Signal	34.6	C
IN-108	Perris Blvd/Mid-County Pkwy WB Ramps	D	Signal	22.6	C	Signal	25.3	C
IN-109	Perris Blvd/Mid-County Pkwy EB Ramps	D	Signal	36.2	D	Signal	38.4	D
IN-110	Evans Rd/Mid-County Pkwy WB Ramps	D	Signal	21.3	C	Signal	22.0	C
IN-111	Evans Rd/Mid-County Pkwy EB Ramps	D	Signal	24.9	C	Signal	24.9	C
IN-112	Placentia Ave/Perris Blvd	D	Signal	34.2	C	Signal	34.6	C
IN-113	Evans Rd/Placentia Ave	D	Signal	7.4	A	Signal	7.4	A
IN-114	Evans Rd/Orange Ave	C	Signal	25.3	C	Signal	25.2	C
IN-115	Evans Rd/Nuevo Rd	C	Signal	31.2	C	Signal	31.1	C
IN-116	Evans Rd/Ellis Ave	D	Signal	13.6	B	Signal	14.3	B
IN-117	Ellis Ave/I-215 SB Ramps	E	Signal	28.3	C	Signal	28.0	C
IN-118	Ellis Ave/SR-215 NB Ramps	E	Signal	34.3	C	Signal	35.0	C
IN-119	Evans Rd/San Jacinto Ave	D	Signal	22.7	C	Signal	22.6	C
IN-120	Park Center Blvd/Ramona Expy WB Ramps	D	CSS	15.3	C	CSS	16.9	C
IN-121	Park Center Blvd/Ramona Expy EB Ramps	D	CSS	23.1	C	CSS	34.9	D
IN-122	Bridge St/Ramona Expy	N/A	N/A	Non-Existent		N/A	Non-Existent	
IN-123	Gilman Springs Rd/Bridge Str	C	CSS	> 180.0	F	CSS	> 180.0	F
IN-124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	CSS	> 180.0	F	CSS	> 180.0	F
IN-125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	CSS	> 180.0	F	CSS	> 180.0	F
IN-126	Ramona Expy/Sanderson Ave	D	Signal	39.9	D	Signal	41.9	D
IN-127	Potrero Blvd/SR-60 WB Ramps	D	Signal	15.3	B	Signal	16.4	B
IN-128	Potrero Blvd/SR-60 EB Ramps	D	Signal	31.3	C	Signal	33.5	C
IN-129	W 6th St/California Ave	C	AWS	178.3	F	AWS	> 180.0	F
IN-130	W 6th St/Beaumont Ave	C	Signal	94.4	F	Signal	106.8	F
IN-131	Reche Canyon Rd/Reche Vista Dr	C	Signal	100.9	F	Signal	109.5	F
IN-132	San Timoteo Canyon Rd/Alessandro Rd	D	AWS	22.2	C	AWS	38.3	E
IN-133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	AWS	127.7	F	AWS	> 180.0	F

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Table 4.15.AP-2: Year 2035 Cumulative plus Project Intersection Levels of Service (P.M. Peak Hour)

ID	Study Intersection	LOS Standard	2035 No Project			2035 With Project		
			Traffic Control	Delay	LOS	Traffic Control	Delay	LOS
IN-134	Redlands Blvd/San Timoteo Canyon Rd	C	AWS	> 180.0	F	AWS	> 180.0	F
IN-135	W Crescent Ave/Alessandro Rd	C	CSS	14.7	B	CSS	15.1	C
IN-136	W Sunset Dr/Alessandro Rd	C	AWS	10.4	B	AWS	10.8	B

Notes:

"NB" and "SB" denote northbound and southbound respectively

"EB" and "WB" denote eastbound and westbound respectively

"LT" and "RT" denote left turn and right turn respectively

Indicates LOS exceeds the target level

"CSS" means cross-street is stop-controlled

"AWS" means all-way stop

"RABT" means roundabout

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

- Elsworth Street/Cactus Avenue;
- I-215 Northbound Ramps/Cactus Avenue;
- Martin Luther King Boulevard/I-215 Northbound Ramps;
- Central Avenue/Chicago Avenue;
- Central Avenue/Canyon Crest Drive;
- Arlington Avenue/Riverside Avenue/SR-91 Southbound Ramps;
- Arlington Avenue/Victoria Avenue;
- Alessandro Boulevard/Chicago Avenue;
- Alessandro Boulevard/Canyon Crest Drive;
- Ramona Expressway/Indian Street;
- Evans Road/Rider Street;
- Gilman Springs Road/Bridge Street;
- SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road;
- SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road;
- W. 6th Street/California Avenue;
- W. 6th Street/Beaumont Avenue;
- Reche Canyon Road/Reche Vista Drive;
- San Timoteo Canyon Road/Live Oak Canyon Road; and
- Redlands Boulevard/San Timoteo Canyon Road.

The project would create a significant cumulative impact at the following five intersections under Year 2035 Cumulative with project conditions since the project would cause a decrease in the LOS from satisfactory to unsatisfactory:

- Redlands Boulevard/Ironwood Avenue;
- Moreno Beach Drive/Cactus Avenue;

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- Redlands Boulevard/Cactus Avenue;
- Moreno Beach Drive/Ironwood Avenue; and
- San Timoteo Canyon Road/Alessandro Road.

Roadway Segment Analysis. 2035 Cumulative plus project roadway segment levels of service for the study area roadway segments are summarized in Table 4.15.AQ, which shows the project would create a significant cumulative impact on the following roadway segment:

- Gilman Springs Road between Alessandro Boulevard and Bridge Street.

Freeway Segment Analysis. Year 2035 Cumulative with project freeway segment levels of service for the study area intersections are summarized in Tables 4.15.AR-1 and 4.15.AR-2, which shows 52 freeway mainline segments would operate at unsatisfactory levels of service. The project would contribute toward the worsening of an already unsatisfactory LOS at 48 of the freeway segments and, therefore, have a significant cumulative impact at these locations. At four freeway segments, a significant cumulative impact would occur since the project would cause a decrease in the LOS from satisfactory to unsatisfactory.

The project would have a significant cumulative impact at the following 48 freeway segments under Year 2035 Cumulative with project conditions:

- Northbound or Eastbound Sections:
 - SR-60 Reservoir Street to Ramona Avenue;
 - SR-60 Ramona Avenue to Central Avenue;
 - SR-60 Central Avenue to Mountain Avenue;
 - SR-60 Mountain Avenue to Euclid Avenue;
 - SR-60 Euclid Avenue to Grove Avenue;
 - SR-60 Grove Avenue to Vineyard Avenue;
 - SR-60 Vineyard Avenue to Archibald Avenue;
 - SR-60 Archibald Avenue to Haven Avenue;
 - SR-60 Valley Way to Rubidoux Boulevard;
 - SR-60 Rubidoux Boulevard to Market Street;
 - SR-60 Market Street to Main Street;
 - SR-60 Martin Luther King Boulevard to Central Avenue;
 - SR-60 Pigeon Pass Road/Frederick Street to Heacock Street;
 - SR-60 Heacock Street to Perris Boulevard;
 - SR-60 Gilman Springs Road to Jack Rabbit Trail;
 - SR-60 Jack Rabbit Trail to I-10/Potrero Boulevard;
 - SR-91 Pierce Street to Magnolia Avenue;
 - SR-91 La Sierra Avenue to Tyler Street;
 - SR-91 Adam Street to Madison Street;

Table 4.15-AQ: Year 2035 Cumulative plus Project Roadway Levels of Service

Roadway	From	To	2035 No-Project Conditions			2035 Plus Build-out Conditions			Project Significant Impact?	Mitigation Measures Required to Reduce Impacts to Less-Than-Significant		LOS after Mitigation
			Roadway Section**	Daily Volume	LOS	Roadway Section**	Daily Volume	LOS		Freeway Volume	PM Peak Hour Density (pc/mi/h)	
S-1	Theodore Street (A)	SR-60 WB Ramps	2U	9,774	C	2U	10,267	D	No			
S-2	Theodore Street (A)	SR-60 EB Ramps	2U	8,726	B	6D	33,082	A	No			
S-3	Fir (Eucalyptus) Ave	Redlands Blvd	2U	6,847	A	4D	10,513	A	No			
S-4	Eucalyptus Ave (B)	Theodore Street (A)	Future Road			4D	6,565	A	No			
S-5	Theodore Street (A)	Fir (Eucalyptus) Ave	2U	3,295	A	6D	35,374	B	No			
S-6	Street E	Theodore Street (A)	Future Road			4U	13,862	A	No			
S-7	Street F	Theodore Street (A)	Future Road			2U	5,009	A	No			
S-8	Theodore Street (A)	Fir (Eucalyptus) Ave	2U	3,437	A	4D	13,001	A	No			
S-9	Alessandro Blvd (Street E)	Mervin Street	2U	10,854	D	4U	13,486	A	No			
S-10	Cactus Ave Extension	Alessandro Blvd (Street E)	Future Road			4U	17,423	B	No			
S-11	Alessandro Blvd (Street C)	Theodore Street (A)	2U	7,437	A	4U	14,680	A	No			
S-13	Alessandro Blvd (Street C)	Street F	2U	7,437	A	4U	21,164	D	No			
S-14	Alessandro Blvd	Moreno Beach Drive	4U	6,373	A	4U	5,416	A	No			
S-16	Gilman Springs Rd	Alessandro Blvd (Street C)	6D	49,434	D	6D	54,288	F	Yes	Widen to 8 lanes	C	
S-17	Gilman Springs Rd	SR-60	6D	41,537	C	6D	47,958	D	No			
S-18	Redlands Blvd	SR-60 EB Ramps	4U	13,411	A	4U	17,626	C	No			
S-19	Redlands Blvd	Fir (Eucalyptus) Ave	4U	7,665	A	4U	5,037	A	No			
S-20	Alessandro Blvd	Redlands Blvd	4U	11,038	A	4U	1,877	A	No			
S-21	Redlands Blvd	Alessandro Blvd	4U	11,511	A	4U	5,653	A	No			
S-22	Cactus Ave	Redlands Blvd	4U	1,144	A	4U	16,916	B	No			

* LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways.

** Section is the number of lanes, with "U" for "undivided" and "D" for "divided" roadways.

*** Road currently has 2 lanes in one direction and 1 lane in the other. The capacity shown is based on the narrower direction.

□ Indicates LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15-AR-1: Year 2035 Cumulative plus Project Freeway Mainline Levels of Service (Northbound/Eastbound)

ID	Freeway	Segment	2035 No Project			2035 Plus Buildout					
			AM Peak Hour Freeway Volume	AM Peak Hour Density (pc/mi/h)	LOS	AM Peak Hour Freeway Volume	AM Peak Hour Density (pc/mi/h)	LOS			
F-2	SR-60	Reservoir St to Ramona Ave	8,560	41.2	E	8,740	43.5	E	8,640	42.8	E
F-3	SR-60	Ramona Ave to Central Ave	8,190	37.8	E	8,370	39.7	E	10,140	65.6	F
F-4	SR-60	Central Ave to Mountain Ave	8,900	44.8	E	9,100	47.6	F	10,110	65.0	F
F-5	SR-60	Mountain Ave to Euclid Ave	8,780	43.4	E	8,990	46.3	F	7,480	33.0	D
F-6	SR-60	Euclid Ave to Grove Ave	9,920	59.3	F	10,120	64.1	F	9,580	55.1	F
F-7	SR-60	Grove Ave to Vineyard Ave	9,210	48.5	F	9,410	51.8	F	9,960	61.9	F
F-8	SR-60	Vineyard Ave to Archibald Ave	9,080	46.3	F	9,290	49.6	F	10,100	64.7	F
F-9	SR-60	Archibald Ave to Haven Ave	8,430	39.5	E	8,650	42.5	E	7,220	31.2	D
F-10	SR-60	Haven Ave to Milliken Ave	8,430	27.5	D	8,690	29.1	D	7,980	26.2	D
F-11	SR-60	Milliken Ave to I-15	5,160	19.8	C	5,420	21.3	C	4,460	17.4	B
F-12	SR-60	I-15 to Etiwanda Ave/Van Buren Blvd	4,140	15.9	B	4,380	17.1	B	2,640	10.5	A
F-13	SR-60	Etiwanda Ave/Van Buren Blvd to Mission Blvd/Country Village Rd	4,950	19.1	C	5,190	20.4	C	3,990	15.7	B
F-14	SR-60	Mission Blvd/Country Village Rd to Pedley Rd	4,380	16.8	B	4,650	18.2	C	2,970	11.7	B

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Table 4.15-AR-1: Year 2035 Cumulative plus Project Freeway Mainline Levels of Service (Northbound/Eastbound)

ID	Freeway	Segment	2035 No Project						2035 Plus Buildout					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS									
F-15	SR-60	Peley Rd to Pyrite St	4,620	17.8	B	3,610	13.9	B	4,870	19.0	C	3,400	13.4	B
F-16	SR-60	Pyrite St to Valley Way	5,060	19.5	C	3,880	15.0	B	5,510	20.9	C	3,650	14.4	B
F-17	SR-60	Valley Way to Rubidoux Blvd	6,160	38.1	E	3,850	19.9	C	6,410	42.3	E	3,790	20.1	C
F-18	SR-60	Rubidoux Blvd to Market St	6,490	42.1	E	4,210	22.2	C	6,710	46.8	F	4,140	22.2	C
F-19	SR-60	Market St to Main St	6,020	36.4	E	6,620	44.9	E	6,240	40.0	E	6,610	48.2	F
F-20	SR-60	Main to SR-91	See Weaving Analysis											
F-24	SR-60	Martin Luther King Blvd to Central Ave	9,500	59.8	F	9,860	70.8	F	9,980	82.8	F	10,060	91.4	F
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	6,090	24.2	C	5,790	22.9	C	6,540	27.2	D	6,010	24.4	C
F-27	SR-60	I-215 to Day St	See Weaving Analysis											
F-29	SR-60	Pigeon Pass Rd to Heacock St	3,330	27.3	D	4,120	38.2	E	3,590	33.6	D	4,110	41.4	E
F-30	SR-60	Heacock St to Penn St	3,020	24.1	C	4,200	39.6	E	3,540	32.9	D	4,240	44.2	E
F-31	SR-60	Penn St to Nason St	2,670	20.9	C	3,520	29.4	D	3,210	28.9	D	3,610	33.4	D
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	2,480	19.2	C	3,130	25.0	C	2,910	25.4	C	3,240	28.5	D
F-34	SR-60	Redlands Blvd to Theodore St	3,200	25.9	C	4,500	45.4	F	3,630	34.0	D	4,280	43.8	E
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	2,420	20.1	C	4,430	53.0	F	2,320	19.3	C	4,580	58.2	F
F-37	SR-60	Jack Rabbit Trail to Potrero Blvd	2,500	19.5	C	4,750	51.8	F	2,400	18.7	C	4,950	59.8	F
F-38	SR-60	Potrero Blvd to I-10	2,300	17.8	B	3,620	30.6	D	2,190	16.9	B	3,810	33.8	D
F-39	SR-91	I-15 to McKinley St	8,140	26.3	D	11,870	52.4	F	8,300	27.2	D	11,740	51.6	F
F-40	SR-91	McKinley St to Pierce St	6,990	29.1	D	6,910	29.0	D	7,110	30.1	D	6,870	29.0	D
F-41	SR-91	Pierce St to Magnolia Ave	6,430	41.3	E	6,360	41.2	E	6,550	43.9	E	6,310	41.0	E
F-42	SR-91	Magnolia Ave to La Sierra Ave	See Weaving Analysis											
F-43	SR-91	La Sierra Ave to Tyler St	6,170	38.1	E	6,250	39.8	E	6,250	39.8	E	6,210	39.7	E
F-44	SR-91	Tyler St to Van Buren Blvd	7,250	30.7	D	6,950	29.2	D	7,350	31.6	D	6,920	29.3	D
F-45	SR-91	Van Buren Blvd to Adam St	7,270	30.8	D	6,290	25.5	D	7,360	31.7	D	6,260	25.5	D
F-46	SR-91	Adam St to Madison St	7,980	36.6	E	6,030	24.3	C	8,060	38.0	E	6,000	24.4	C
F-47	SR-91	Madison St to Arlington Ave	7,000	29.6	D	5,390	21.4	C	7,030	30.2	D	5,370	21.4	C
F-49	SR-91	Central Ave to 14th St	6,400	40.9	E	5,730	33.4	D	6,410	41.5	E	5,580	32.2	D
F-51	SR-91	University Ave to Spruce St	8,160	26.4	D	7,420	23.4	C	8,110	26.2	D	7,290	22.9	C
F-52	I-10	SR-60 to Beaumont Ave	5,030	19.7	C	8,170	38.3	E	5,060	19.9	C	8,230	39.2	E
F-53	I-10	Beaumont Ave to Pennsylvania Ave	5,100	20.1	C	8,030	37.1	E	5,130	20.3	C	7,990	37.0	E
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	5,240	20.7	C	8,170	38.3	E	5,260	20.8	C	8,200	38.9	E
F-55	I-10	Highland Springs Ave to Sunset Ave	5,350	21.2	C	8,240	38.9	E	5,340	21.3	C	8,230	39.2	E
F-56	I-10	Sunset Ave to 22nd St	4,970	19.6	C	7,670	34.5	D	4,950	19.6	C	7,680	34.5	D
F-57	I-10	22nd St to 8th St	4,880	19.3	C	7,480	33.0	D	4,870	19.2	C	7,500	33.2	D
F-58	I-10	8th St to S Haigraue St	5,000	19.7	C	7,770	34.9	D	4,970	19.7	C	7,810	35.5	E
F-59	I-10	Haigraue St to Fields Rd	3,990	18.8	C	7,970	36.9	E	4,730	18.6	C	8,020	37.3	E
F-60	I-10	Fields Rd to Morongo Tr	3,990	15.8	B	7,490	33.1	D	3,950	15.7	B	7,520	33.3	D
F-61	I-10	Morongo Tr to Main St	4,320	17.1	B	7,800	35.2	E	4,310	17.0	B	7,850	35.9	E
F-62	I-10	Main St to Haugen-Lehmann Way	4,080	16.1	B	7,530	33.1	D	4,060	16.1	B	7,600	33.9	D
F-64	I-10	SR-111 to Tipton Rd	3,660	14.5	B	7,320	31.7	D	3,640	14.4	B	7,420	32.6	D
F-65	I-10	Tipton Rd to SR-62	3,700	14.6	B	7,330	31.7	D	3,680	14.6	B	7,440	32.7	D
F-66	I-215	Scott Rd to Garbani Rd	3,350	17.2	B	6,010	36.0	E	3,370	17.3	B	5,980	35.6	E
F-84	I-215	Garbani Rd to Newport Rd	3,150	16.1	B	5,680	32.9	D	3,200	16.5	B	5,650	32.6	D
F-68	I-215	Newport Rd to McCall Blvd	2,910	15.0	B	4,610	24.4	C	2,980	15.3	B	4,580	24.2	C
F-69	I-215	McCall Blvd to Ethanac Rd	3,530	18.1	C	5,570	31.9	D	3,600	18.5	C	5,540	31.6	D
F-70	I-215	Ethanac Rd to SR-74	5,240	29.1	D	5,650	32.6	D	5,290	29.5	D	5,610	32.3	D

Table 4.15-AR-1: Year 2035 Cumulative plus Project Freeway Mainline Levels of Service (Northbound/Eastbound)

ID	Freeway	Segment	2035 No Project				2035 Plus Buildout							
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour					
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS			
F-71	I-215	SR-74 to Ellis Ave	5,200	28.7	D	6,760	46.1	F	5,200	28.7	D	6,740	45.8	F
F-85	I-215	Ellis Ave to Redlands Ave	4,820	25.9	C	6,200	38.4	E	4,840	26.0	D	6,170	38.1	E
F-74	I-215	Columbia Ave to Center St	4,110	21.6	C	3,350	17.5	B	4,090	21.4	C	3,410	17.8	B
F-75	I-215	Center St to La Cadena Dr	4,940	26.9	D	4,270	22.7	C	4,930	27.0	D	4,350	23.2	C
F-76	I-215	La Cadena Dr to Barton Rd	4,880	26.5	D	4,310	22.8	C	4,900	26.6	D	4,400	23.5	C
F-77	I-215	Barton Rd to Mt. Vernon Ave	5,320	29.9	D	4,700	25.4	C	5,280	29.6	D	4,760	25.8	C
F-78	I-215	Mt. Vernon Ave to I-10	5,110	19.8	C	5,720	22.5	C	5,070	19.7	C	5,870	23.4	C
F-80	I-215	Auto Plaza Dr to Mill St	4,680	18.0	B	5,980	23.6	C	4,600	17.8	B	6,030	24.0	C
F-83	I-215	Baseline Rd to Highland Ave	3,260	16.8	B	4,890	26.4	D	3,250	16.7	B	5,000	27.4	D

Indicates that the LOS exceeds the target level
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15-AR-2: Year 2035 Cumulative plus Project Freeway Mainline Levels of Service (Southbound/Westbound)

ID	Freeway	Segment	2035 No-Project				2035 Plus Buildout							
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour					
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS			
F-2	SR-60	Reservoir St to Rainona Ave	8,770	43.3	E	7,840	34.6	D	8,670	42.7	E	7,920	35.8	E
F-3	SR-60	Ramona Ave to Central Ave	8,080	37.2	E	7,720	33.7	D	7,970	36.5	E	7,790	34.8	D
F-4	SR-60	Central Ave to Mountain Ave	6,940	25.4	C	7,580	32.7	D	6,260	25.2	C	7,630	33.6	D
F-5	SR-60	Mountain Ave to Euclid Ave	6,230	25.2	C	8,250	37.9	E	6,120	24.8	C	8,310	39.2	E
F-6	SR-60	Euclid Ave to Grove Ave	6,470	26.1	D	7,950	35.5	E	6,390	25.9	C	8,050	36.9	E
F-7	SR-60	Grove Ave to Vineyard Ave	6,280	25.0	C	8,150	37.1	E	6,200	24.7	C	8,240	38.6	E
F-8	SR-60	Vineyard Ave to Archibald Ave	7,660	33.3	D	7,640	33.1	D	7,570	32.9	D	7,720	34.3	D
F-9	SR-60	Archibald Ave to Haven Ave	See Weaving Analysis											
F-10	SR-60	Haven Ave to Milliken Ave	6,510	20.3	C	7,970	25.6	C	6,380	19.9	C	8,100	26.3	D
F-11	SR-60	Milliken Ave to I-15	5,460	21.0	C	7,180	29.8	D	5,350	20.8	C	7,320	31.2	D
F-12	SR-60	I-15 to Etiwanda Ave/Van Buren Blvd	4,840	14.9	B	6,360	19.4	C	4,690	14.6	B	6,520	20.2	C
F-13	SR-60	Etiwanda Ave/Van Buren Blvd to Mission Blvd/Country Village Rd	4,220	16.1	B	5,620	21.6	C	4,080	15.8	B	5,790	22.9	C
F-14	SR-60	Mission Blvd/Country Village Rd to Pradley Rd	4,140	15.9	B	5,660	21.8	C	4,010	15.6	B	5,750	22.7	C
F-15	SR-60	Pradley Rd to Pyrite St	3,260	12.5	B	4,820	18.3	C	3,110	12.1	B	4,860	18.8	C
F-16	SR-60	Pyrite St to Valley Way	2,470	9.5	A	3,930	14.9	B	2,330	9.2	A	4,000	15.5	B
F-17	SR-60	Valley Way to Rubidoux Blvd	4,560	24.1	C	6,360	39.6	E	4,420	23.5	C	6,390	41.2	E
F-18	SR-60	Rubidoux Blvd to Market St	3,410	17.5	B	5,120	27.7	D	3,280	17.1	B	5,420	31.0	D
F-19	SR-60	Market St to Main St	5,530	31.5	D	6,280	38.7	E	5,400	30.8	D	6,430	41.7	E
F-20	SR-60	Main to SR-91	5,320	29.7	D	6,310	39.0	E	5,300	30.0	D	6,480	42.4	E
F-24	SR-60	Marlin Luther King Blvd to Central Ave	8,330	30.8	D	8,980	33.3	D	8,240	31.6	D	9,360	39.7	E
F-26	SR-60	Fair Isle Dr/Box Springs Rd to I-215	7,500	33.2	D	8,970	46.6	F	7,420	33.6	D	9,250	52.1	F
F-27	SR-60	I-215 to Day St	7,050	50.4	F	3,590	18.6	C	7,080	53.6	F	3,810	20.8	C
F-29	SR-60	Pigeon Pass Rd to Heacock St	3,650	31.3	D	3,910	35.0	E	3,590	32.1	D	4,120	42.4	E
F-30	SR-60	Heacock St to Penris Blvd	3,560	30.1	D	3,410	28.3	D	3,610	32.4	D	3,730	35.3	E
F-31	SR-60	Penris Blvd to Nason St	3,330	27.3	D	2,780	20.9	C	3,430	30.1	D	3,140	27.6	D
F-33	SR-60	Moreno Beach Dr to Redlands Blvd	3,150	25.2	C	2,680	20.9	C	3,270	28.1	D	3,010	26.1	D
F-34	SR-60	Redlands Blvd to Theodore St	4,010	36.3	E	3,530	29.7	D	4,290	44.0	E	3,780	35.0	E
F-36	SR-60	Gilman Springs Rd to Jack Rabbit Trail	3,350	30.5	D	2,920	25.2	C	3,450	31.9	D	2,680	23.5	C
F-37	SR-60	Jack Rabbit Trail to Portero Blvd	3,690	31.6	D	3,010	24.0	C	3,840	34.3	D	2,820	22.4	C

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Table 4.15-AR-2: Year 2035 Cumulative plus Project Freeway Mainline Levels of Service (Southbound/Westbound)

ID	Freeway	Segment	2035 No-Project						2035 Plus Buildout					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS
F-38	SR-60	Potero Blvd to I-10	2,960	18.2	C	1,930	15.0	B	2,450	19.3	C	1,810	14.1	B
F-39	SR-91	I-15 to McKinley St	8,650	28.6	D	8,650	28.6	D	8,430	28.0	D	8,850	28.8	D
F-40	SR-91	McKinley St to Pierce St	6,260	26.9	D	7,440	32.0	D	6,430	26.4	D	7,630	33.6	D
F-41	SR-91	Pierce St to Magnolia Ave	6,260	39.9	E	9,000	144.5	F	6,160	39.0	E	9,170	177.2	F
F-42	SR-91	Magnolia Ave to La Sierra Ave	6,130	38.3	E	8,600	107.0	F	6,050	37.7	E	8,720	119.7	F
F-43	SR-91	La Sierra Ave to Tyler St	5,460	31.4	D	6,380	40.8	E	5,380	30.9	D	6,510	43.3	E
F-44	SR-91	Tyler St to Van Buren Blvd	6,980	28.8	D	7,970	35.9	E	6,810	28.6	D	8,080	37.2	E
F-45	SR-91	Van Buren Blvd to Adam St	6,690	27.1	D	7,720	34.0	D	6,540	27.0	D	7,830	36.1	E
F-46	SR-91	Adam St to Madison St	6,270	25.4	C	6,970	29.0	D	6,250	25.5	C	7,080	29.8	D
F-47	SR-91	Madison St to Arlington Ave	5,540	32.1	D	6,290	39.5	E	5,560	32.6	D	6,360	40.8	E
F-49	SR-91	Central Ave to 14th St	5,290	20.8	C	5,460	21.2	C	5,270	20.9	C	5,560	22.0	C
F-51	SR-91	University Ave to Spruce St	7,920	35.3	E	6,060	24.5	C	7,880	36.1	E	6,040	24.5	C
F-52	I-10	SR-60 to Beaumont Ave	7,660	34.1	D	5,840	23.5	C	7,680	34.3	D	5,820	23.4	C
F-53	I-10	Beaumont Ave to Pennsylvania Ave	8,180	38.4	E	5,920	23.9	C	8,250	39.4	E	5,860	23.7	C
F-54	I-10	Pennsylvania Ave to Highland Springs Ave	7,990	36.7	E	5,590	22.3	C	8,060	37.7	E	5,550	22.2	C
F-55	I-10	Highland Springs Ave to Sunset Ave	7,620	33.8	D	5,420	21.5	C	7,720	34.9	D	5,430	21.7	C
F-56	I-10	Sunset Ave to 22nd St	7,680	34.5	D	5,130	20.3	C	7,680	34.5	D	5,120	20.4	C
F-57	I-10	22nd St to 8th St	7,790	35.4	E	5,370	21.4	C	7,860	36.0	E	5,350	21.4	C
F-58	I-10	8th St to S Haigraue St	7,610	34.0	D	5,000	19.8	C	7,720	34.9	D	4,960	19.8	C
F-59	I-10	Haigraue St to Fields Rd	7,150	30.7	D	4,620	18.3	C	7,270	31.6	D	4,590	18.3	C
F-60	I-10	Fields Rd to Morongo Tr	7,040	30.0	D	5,040	20.0	C	7,190	31.0	D	5,010	19.9	C
F-61	I-10	Main St (Cabazon) to Main St	7,070	30.2	D	4,410	17.4	B	7,230	31.3	D	4,560	18.0	C
F-62	I-10	Main St to Haugen-Lehmann Way	6,420	26.2	D	4,860	19.2	C	6,560	27.1	D	4,830	19.1	C
F-63	I-10	SR-111 to Tipton Rd	6,430	26.2	D	4,870	19.2	C	6,570	27.2	D	4,840	19.1	C
F-64	I-10	Tipton Rd to SR-62	5,470	30.8	D	4,160	21.5	C	5,380	29.8	D	4,170	21.7	C
F-65	I-215	Scott Rd to Garbani Rd	4,950	26.6	D	4,040	20.9	C	4,880	26.1	D	4,030	20.9	C
F-66	I-215	Garbani Rd to Newport Rd	5,020	27.2	D	5,240	28.9	D	4,930	26.5	D	5,230	29.0	D
F-67	I-215	Newport Rd to McCall Blvd	5,400	30.4	D	4,800	25.6	C	5,300	29.6	D	4,790	25.7	C
F-68	I-215	McCall Blvd to Ethanac Rd	5,390	30.3	D	6,220	38.3	E	5,320	29.5	D	6,220	38.3	E
F-69	I-215	Ethanac Rd to SR-74	7,700	53.3	F	5,980	35.6	E	7,110	51.5	F	6,000	36.8	E
F-70	I-215	SR-74 to Ellis Ave	6,560	43.1	E	4,480	31.2	D	6,510	42.0	E	5,510	31.4	D
F-71	I-215	Ellis Ave to Redlands Ave	5,000	27.4	D	3,660	19.1	C	4,970	27.2	D	3,660	19.2	C
F-72	I-215	Columbia Ave to Center St	5,970	35.8	E	4,690	25.1	C	6,010	36.6	E	4,740	25.6	C
F-73	I-215	Center St to La Cadena Dr	5,060	27.8	D	3,780	19.7	C	5,100	28.2	D	3,790	19.8	C
F-74	I-215	La Cadena Dr to Barton Rd	5,540	31.6	D	4,210	22.2	C	5,590	32.3	D	4,220	22.2	C
F-75	I-215	Barton Rd to Mt. Vernon Ave	6,480	26.2	D	5,210	20.3	C	6,570	26.7	D	5,190	20.3	C
F-76	I-215	Mt. Vernon Ave to I-10	5,600	21.7	C	4,540	17.4	C	5,500	21.4	C	4,570	17.6	B
F-77	I-215	Auto Plaza Dr to Mill St	6,910	48.0	F	5,450	30.8	D	6,930	48.3	F	5,470	31.4	D
F-78	I-215	Baseline Rd to Highland Ave												

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

- SR-91 Central Avenue to 14th Street;
- I-10 SR-60 to Beaumont Avenue;
- I-10 Pennsylvania Avenue to Highland Springs Avenue;
- I-10 Highland Springs Avenue to Sunset Avenue;
- I-10 S. Hargrave Street to Field Road; and
- I-10 Main Street (Cabazon) to Main Street.
- Southbound or Westbound Sections:
 - SR-60 Reservoir Street to Ramona Avenue;
 - SR-60 Mountain Avenue to Euclid Avenue;
 - SR-60 Euclid Avenue to Grove Avenue;
 - SR-60 Grove Avenue to Vineyard Avenue;
 - SR-60 Valley Way to Rubidoux Boulevard;
 - SR-60 Market Street to Main Street;
 - SR-60 Main Street to SR-91;
 - SR-60 Martin Luther King Boulevard to Central Avenue;
 - SR-60 Fair Isle Drive/Box Springs Road to I-215;
 - SR-60 I-215 to Day Street;
 - SR-60 Redlands Boulevard to Theodore Street;
 - SR-91 Pierce Street to Magnolia Avenue;
 - SR-91 Magnolia Avenue to La Sierra Avenue;
 - SR-91 La Sierra Avenue to Tyler Street;
 - SR-91 Tyler Street to Van Buren Boulevard;
 - SR-91 Madison Street to Arlington Avenue;
 - I-10 SR-60 to Beaumont Avenue;
 - I-10 Pennsylvania Avenue to Highland Springs Avenue;
 - I-10 Highland Springs Avenue to Sunset Avenue;
 - I-10 8th Street to S. Hargrave Street;
 - I-215 SR-74 to Ellis Avenue;
 - I-215 Center Street to Iowa Avenue/La Cadena Drive; and
 - I-215 Baseline Road to Highland Avenue.

The project would create a significant cumulative impact at the following four freeway segments under Year 2035 Cumulative with project conditions:

- Northbound or Eastbound Sections:
 - I-10 8th Street to S. Hargrave Street.
- Southbound or Westbound Sections:

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- SR-60 from Martin Luther King Boulevard to Central Avenue;
- SR-60 from Heacock Street to Perris Boulevard; and
- SR-91 from Van Buren Boulevard to Adam Street.

Freeway Weaving Analysis. Year 2035 Cumulative with project freeway weaving segment levels of service are summarized in Tables 4.15.AS-1 and 4.15.AS-2, which shows 14 freeway weaving segments would operate at unsatisfactory levels of service. The project would contribute toward the worsening of an already unsatisfactory LOS at 10 of the freeway weaving segments and, therefore, would have a cumulative impact at these locations. The project would create a significant cumulative impact at one freeway weaving segment since the project would cause a decrease in the LOS from satisfactory to unsatisfactory. The project would have a cumulative impact at the following 14 freeway weaving segments under Year 2035 Cumulative with project conditions:

- Northbound or Eastbound:
 - SR-60 SR-71/S. Garey Avenue to Reservoir Street;
 - SR-60 Main Street to SR-91;
 - SR-60 SR-91 to W. Blaine Street/3rd Street;
 - SR-60 W. Blaine Street/3rd Street to University Avenue;
 - SR-60 Central Avenue to Fair Isle Drive/Box Springs Road; and
 - SR-91 Arlington Avenue to Central Avenue.
- Southbound or Westbound:
 - SR-60 Haven Avenue to Archibald Avenue;
 - SR-60 SR-91 to W. Blaine Street/3rd Street;
 - SR-60 W. Blaine Street/3rd Street to University Avenue;
 - SR-60 University Avenue to Martin Luther King Boulevard;
 - SR-60 Central Avenue to Fair Isle Drive/Box Springs Road;
 - SR-60 Day Street to Pigeon Pass Road/Frederick Street;
 - SR-91 14th Street to University Avenue; and
 - I-10 Haugen-Lehmann Way to SR-111.

The project would create a significant cumulative impact at the following freeway weaving segment under Year 2035 Cumulative with project conditions:

- Southbound or Westbound Sections:
 - SR-60 Day Street to Pigeon Pass Road/Frederick Street.

Freeway Ramp Analysis. Year 2035 Cumulative with project freeway ramp merge/diverge levels of service are summarized in Table 4.15.AT, which shows ten freeway ramps would operate at unsatisfactory levels of service. The project would contribute toward the worsening of an already unsatisfactory LOS at three freeway ramps and, therefore, have a significant cumulative impact at

Table 4.15-AS-1: Year 2035 Cumulative plus Project Freeway Weaving Segment Levels of Service (Northbound/Eastbound)

ID	Freeway	Weaving Segment	2035 No-Project Conditions				2035 Plus Buildout Conditions							
			A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour					
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS			
W-1	SR-60	SR-71/S Garey Ave to Reservoir St	8,630	39.7	E	9,700	46.8	E	8,820	41.2	E	9,570	46.5	E
W-9	SR-60	Haven Ave to Archibald Ave	See Basic Analysis				See Basic Analysis							
W-20	SR-60	Main St to SR-91	7,060	34.1	D	7,110	35.1	E	7,280	35.8	E	7,040	35.2	E
W-21	SR-60	SR-91 to Blaine St/3rd St	7,280	32.4	D	10,640	>Capacity	F	7,540	34.3	D	10,640	>Capacity	F
W-22	SR-60	Blaine St/3rd St to University Ave	7,120	28.9	D	8,460	36.7	E	7,460	31.9	D	8,570	40.9	E
W-23	SR-60	University Ave to Martin Luther King Blvd	7,960	30.0	D	7,040	26.4	C	8,310	32.0	C	7,160	27.4	C
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs Rd	7,890	37.0	E	8,640	40.5	E	8,370	43.9	E	8,760	44.5	E
W-27	SR-60	I-215 to Day St	3,980	16.3	B	6,210	27.7	C	4,460	21.4	C	6,200	30.8	D
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	3,760	16.2	B	3,760	26.5	C	5,660	18.9	B	5,690	27.2	C
W-32	SR-60	Moreno Beach Dr to Nason St	2,640	16.5	B	3,480	22.6	C	3,150	21.0	C	3,650	24.9	C
W-35	SR-60	Theodore St to Gilman Springs Rd	3,070	17.5	B	5,710	37.9	E	3,080	18.3	B	5,360	36.2	E
W-42	SR-91	Magnolia Ave to La Sierra Ave	6,970	33.7	D	6,930	34.2	D	7,080	34.4	D	6,900	34.2	D
W-48	SR-91	Arlington Ave to Central Ave	7,620	41.0	E	4,370	21.3	C	7,660	41.6	E	4,220	20.6	C
W-50	SR-91	14th St to University Ave	5,310	26.4	C	5,060	26.1	C	5,260	26.2	C	4,930	25.4	C
W-51	SR-91	SR-60 to Mission Inn Ave/University Ave	See Basic Analysis				See Basic Analysis							
W-63	I-10	Haugen-Lehmann Way to SR-111	4,170	14.4	B	8,420	33.1	D	4,140	14.3	B	8,550	34.1	D
W-73	I-215	SR-60 to Columbia Ave	5,330	28.4	D	4,610	24.6	C	5,300	28.3	D	4,670	25.0	C
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	4,590	16.9	B	5,640	20.9	C	4,570	16.8	B	5,730	21.3	C
W-81	I-215	Mill St to 2 nd St	5,190	18.3	B	6,460	23.5	C	5,160	18.2	B	6,560	23.9	C
W-92	I-215	5 th St to Baseline Rd	3,900	13.5	B	4,980	17.7	B	3,880	13.4	B	5,050	18.0	B

Indicates that the LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15-AS-2: Year 2035 Cumulative plus Project Freeway Weaving Segment Levels of Service (Southbound/Westbound)

ID	Freeway	Weaving Segment	2035 No-Project Conditions				2035 Plus Buildout Conditions							
			A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour					
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS			
W-1	SR-60	SR-71/S Garey Ave to Reservoir St	6,130	22.0	C	7,510	27.6	C	6,040	21.8	C	7,620	28.4	D
W-9	SR-60	Haven Ave to Archibald Ave	6,190	28.7	D	8,180	36.4	E	6,800	28.5	D	8,270	37.1	E
W-20	SR-60	Main St to SR-91	See Basic Analysis				See Basic Analysis							
W-21	SR-60	SR-91 to Blaine St/3rd St	8,490	33.7	D	9,970	40.9	E	8,380	33.5	D	10,290	>Capacity	F
W-22	SR-60	Blaine St/3rd St to University Ave	6,320	24.3	C	8,890	35.8	E	6,320	25.3	C	9,220	39.6	E
W-23	SR-60	University Ave to Martin Luther King Blvd	6,750	28.2	D	8,830	36.9	E	6,670	28.3	D	9,130	39.2	E
W-25	SR-60	Central Ave to Fair Isle Dr/Box Springs Rd	8,340	38.1	E	9,200	39.2	E	8,170	38.5	E	9,560	43.8	E
W-27	SR-60	I-215 to Day St	See Basic Analysis				See Basic Analysis							
W-28	SR-60	Day St to Pigeon Pass Rd/Frederick St	4,790	33.5	D	4,790	32.4	D	4,820	34.5	D	5,100	36.1	E
W-32	SR-60	Moreno Beach Dr to Nason St	3,310	20.5	C	2,680	16.2	B	3,480	22.2	C	3,040	19.5	B
W-35	SR-60	Theodore St to Gilman Springs Rd	4,560	32.0	D	3,680	24.2	C	4,220	27.3	C	3,470	22.5	C
W-42	SR-91	Magnolia Ave to La Sierra Ave	See Basic Analysis				See Basic Analysis							
W-48	SR-91	Arlington Ave to Central Ave	5,160	24.9	C	5,760	27.4	C	5,140	24.9	C	5,830	28.0	D
W-51	SR-91	14th St to University Ave	6,070	23.7	C	8,010	33.0	D	6,020	23.6	C	8,050	33.3	D
W-63	I-10	SR-60 to Mission Inn Ave/University Ave	6,500	20.6	C	10,130	32.5	D	6,460	20.7	C	10,140	32.7	D
W-63	I-10	Haugen-Lehmann Way to SR-111	7,270	29.0	D	5,500	>Capacity	F	7,440	30.0	D	5,480	>Capacity	F
W-73	I-215	SR-60 to Columbia Ave	6,660	33.8	D	5,570	28.2	D	6,640	33.8	D	5,660	28.3	D
W-79	I-215	I-10 to Auto Plaza Dr/Orange Show Rd	6,200	22.5	C	4,950	18.8	B	6,240	22.7	C	4,970	18.9	B

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Table 4.15-AS-2: Year 2035 Cumulative plus Project Freeway Weaving Segment Levels of Service (Southbound/Westbound)

ID	Freeway	Weaving Segment	2035 No-Project Conditions				2035 Plus Buildout Conditions							
			A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour					
			Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS	Freeway Volume	Density (pc/mi/ln)	LOS			
W-81	I-215	Mill St to 2 nd St	6,360	23.4	C	4,980	18.3	B	6,370	23.5	C	5,020	18.5	B
W-82	I-215	5 th St to Baseline Rd	5,610	20.3	C	4,060	14.6	B	5,620	20.3	C	4,060	14.6	B

Indicates that the LOS exceeds the target level
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15-AT: Year 2035 Cumulative plus Project Freeway Ramp Levels of Service

ID	Freeway / Direction	Ramp Segment	Ramp No. of Lanes	2035 No-Project Conditions				2035 Plus Buildout Conditions										
				A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour								
				Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density (pc/mi/ln)	LOS			
R-1	SR-60 EB	On-Ramp from Martin Luther King Blvd	7,410	580	30.6	D	6,430	1,400	33.8	D	7,760	680	33.0	D	6,530	1,460	35.1	E
R-2	SR-60 EB	On-Ramp from Central Ave	7,890	1,220	32.2	F	6,630	970	32.9	F	6,370	1,360	35.5	F	8,760	970	33.9	F
R-3	SR-60 EB	Off-Ramp to Redlands Blvd	2,480	220	13.8	B	3,130	440	19.7	B	2,910	280	20.0	C	3,240	680	22.6	C
R-4	SR-60 EB	Loop On-Ramp from Redlands Blvd	2,260	90	22.1	C	2,690	60	25.4	C	2,630	110	27.2	C	2,560	70	25.8	C
R-5	SR-60 EB	Direct On-Ramp from Redlands Blvd	2,350	110	19.9	B	2,750	480	26.0	C	2,740	140	25.3	C	2,630	480	26.4	C
R-6	SR-60 EB	Off-Ramp to Theodore St	3,200	270	25.0	C	4,500	150	36.7	F	3,630	850	24.3	C	4,280	410	27.8	C
R-7	SR-60 EB	Loop On-Ramp from Theodore St	2,930	150	22.0	C	4,350	1,350	42.9	F	2,780	50	27.6	C	3,870	350	38.5	E
R-8	SR-60 EB	Direct On-Ramp from Theodore St	Does not Exist in this Scenario				Does not Exist in this Scenario				Does not Exist in this Scenario							
R-9	SR-60 EB	Off-Ramp to Gilman Springs Rd	3,070	840	19.4	B	5,710	1,570	35.8	E	3,080	980	19.8	B	5,360	1,240	34.0	D
R-10	SR-60 EB	On-Ramp from Gilman Springs Rd	2,230	280	16.9	B	4,140	470	34.3	F	2,100	300	16.5	B	4,120	690	36.4	F
R-11	SR-60 WB	Off-Ramp to Gilman Springs Rd	3,350	240	20.9	C	2,920	560	18.2	B	3,450	450	21.5	C	2,680	530	16.8	B
R-12	SR-60 WB	On-Ramp from Gilman Springs Rd	3,110	1,330	32.2	D	2,360	1,140	24.6	C	3,000	1,050	29.3	D	2,150	1,130	23.2	C
R-13	SR-60 WB	Off-Ramp to Theodore St	4,560	640	32.7	F	3,680	380	24.8	C	4,220	710	26.9	C	3,470	420	22.2	C
R-14	SR-60 WB	On-Ramp from Theodore St	3,920	90	35.5	E	3,300	230	31.5	D	3,510	520	36.8	E	3,050	640	34.1	D
R-15	SR-60 WB	Off-Ramp to Redlands Blvd	4,010	310	32.4	D	3,530	370	28.1	D	4,290	420	36.1	E	3,780	540	31.6	D
R-16	SR-60 WB	Loop On-Ramp from Redlands Blvd	3,700	200	31.8	E	3,160	110	26.7	D	3,870	210	34.3	E	3,240	150	28.6	D
R-17	SR-60 WB	Direct On-Ramp from Redlands Blvd	3,900	350	34.7	D	3,270	280	29.0	D	4,080	390	37.6	F	3,390	630	34.2	D
R-18	SR-60 WB	Off-Ramp to Central Ave	8,340	480	32.0	D	9,200	540	35.0	D	8,170	480	31.8	D	9,560	540	37.0	E
R-19	SR-60 WB	Off-Ramp to Martin Luther King Blvd	8,330	710	32.5	D	8,980	660	34.1	D	8,240	720	32.5	D	9,380	670	36.0	E

Indicates that the LOS exceeds the target level
 Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

these locations. The project would create a significant cumulative impact at five freeway ramp locations under Year 2035 Cumulative with project conditions since the project would cause a decrease in the LOS from satisfactory to unsatisfactory.

The project would have a significant impact at the following three freeway ramps under Year 2035 Cumulative with project conditions:

- SR-60 Eastbound On-Ramp from Central Avenue;
- SR-60 Eastbound On-Ramp from Gilman Springs Road;
- SR-60 Westbound On-Ramp from Theodore Street;

Westbound SR-60 Loop On-Ramp from Redlands Boulevard (R-16) will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

The project would also create a significant cumulative impact at the following five freeway ramps under Year 2035 Cumulative with project conditions:

- SR-60 Eastbound On-Ramp from Martin Luther King Boulevard;
- SR-60 Westbound Off-Ramp to Redlands Boulevard;
- SR-60 Westbound Direct On-Ramp from Redlands Boulevard;
- SR-60 Westbound Off-Ramp to Central Ave; and
- SR-60 Westbound Off-Ramp to Martin Luther King Boulevard.

Note: Section 4.15.6.5 has been added to this Final EIR in response to: Comment F-1-49 in Letter F-1 from the Center for Biological Diversity/San Bernardino Valley Audubon Society; Comment F-3-4 in Letter F-3 from the California Clean Energy Committee; Appendix 78 in Letter F-3 from the California Clean Energy Committee; Comment F-9A-22 in Letter F-9A from the Sierra Club, Center for Community Action & Environmental Justice, and Natural Resources Defense Council; Comments F-9C-2, 4, 5, 6, and 7 in Letter F-9C from Sustainable Systems Research, LLC; Comment F-11-23 in Letter F-11 from the Sierra Club, San Geronio Chapter; Comment F-13-11 in Letter F-13 from the Sierra Club and Friends for a Livable Moreno Valley; and Comment G-51-45 in Letter G-51 from Michael McCoy.

4.15.6.5 Freeway Impacts from Truck Trips to the Ports of Los Angeles and Long Beach

Threshold:	<p>Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit.</p> <p>Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</p>
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A significant project-specific traffic impact would occur if the project would cause a decrease from satisfactory LOS (based on local agency adopted standards) to an unsatisfactory LOS on a study area intersection, roadway segment, freeway mainline lane, freeway weaving segment or freeway ramp. A significant cumulative traffic impact would occur if the project contributes traffic toward those facilities operating at unsatisfactory LOS in the pre-project condition. The adopted LOS standards are as follows:

- Roadway segments: LOS C and LOS D as outlined in previously referenced Tables 4.15.B and 4.15.C.
- Intersections: LOS C and LOS D as outlined in previously referenced Table 4.15.Z.
- Freeway mainline: LOS D.
- Freeway Ramp Merge/Diverge: LOS D.

Several comments received on the Draft EIR indicated confusion regarding the volume of truck traffic between the WLC and the Ports of Los Angeles and Long Beach. In general, the DEIR commenters seemed to believe that the truck traffic between the WLC and the ports will be much higher than will actually occur. This section responds to these comments by 1) describing the current share of port-related use of warehouse space, 2) estimating the truck traffic between the WLC and the ports using three different methods, 3) estimating the growth in WLC truck traffic to the port over time, and 4) determining whether WLC trucks would impose significant impacts on the freeways to the ports beyond those identified in previous chapters.

Current Share of Port-Related Warehouse Space. The DEIR commenters referred to SCAG's study titled *Industrial Space in Southern California: Future Supply and Demand for Warehousing and Intermodal Facilities*. This study states that 13 percent of the occupied warehouse space in the SCAG region in 2009 was port-related. This indicates that while the ports are important sources of demand for warehouse space, the great majority of warehouse space serves other demands. In a large regional economy such as southern California this other demand amounted to 578 million square feet in 2009, and is growing over time.

The SCAG study also shows wide differentiation in the markets served. Riverside County serves only a small percentage of port-related demand while playing a much more important role in serving non-port demand. This differentiation reflects the tendency of warehouse tenants whose operations rely on the ports to self-select locations close to the port.

The information provided in the report indicates that only 5 percent of the warehouse space in Riverside County serves port-related demand, which suggests that the volume of truck traffic between the ports and warehouses in Riverside County, including those in WLC, will be relatively small.

The study also reached two conclusions regarding the regional supply of warehouse space, taken from the report's Executive Summary (pages ES-1 and ES-2):

“According to assumed growth rates, the region will run out of suitably zoned vacant land in about the year 2028. At that time, forecasts show that the demand for warehousing space will be approximately 1,023 million square feet.

During the year 2035, there will be a projected shortfall of space of about 228 million square feet, unless other land not currently zoned for warehousing becomes available.”

In other words, according to the SCAG study cited by the commenters, even if all of the land currently zoned for warehouse space were developed, there would still be a massive shortfall of warehouse space by 2035 unless projects like the WLC are approved and built.

Estimating Truck Trips between WLC and the Ports. In order to ensure that a reasonable worst-case scenario was used for the impact analysis, the number of truck trips between the WLC and the ports was forecast using three different methods, all based on data provided by regional planning agencies, with the highest of the three forecasts used for the analysis. The three methods were as follows:

- ***Method 1: RivTAM Model.*** The first method for estimating truck trips to the port was to use the RivTAM model. As described in Chapter 2, RivTAM is the standard traffic forecasting tool used by agencies in Riverside County to analyze the regional effects of proposed projects. Like most other traffic models, RivTAM assigns trips to destinations using a gravity model where the number of trips between each origin/destination pair increases in proportion to the number of trips generated at each end, but decreases in proportion to the distance between the origin and destination. The effect of distance on the likelihood of travel between origin-destination pairs is determined by the trip length distribution which in turn is based on survey data.

The WLC's proposed land uses were input into the RivTAM model as described in Chapter 2, the model was run, and the outputs were checked to find how many truck trips were assigned between the ports TAZs and the WLC. Using the RivTAM model to estimate truck trips yields 82 truck trips per day between the ports and the WLC if the WLC were built today (i.e., the 2012 Plus Full Build-Out scenario).

- ***Method 2: Based on Port Truck Study.*** The best information currently available on truck trips from the ports comes from the Ports of Los Angeles and Long Beach Year 2010 Marine Terminal Gate Surveys. These surveys found that 1.5 percent of truck trips entering the ports came from Riverside County and 1.7 percent of trucks leaving the ports went to Riverside County. These findings are consistent with an earlier study that found 1 percent of truck trips entering the ports came from Riverside County and 2 percent of truck trips leaving the ports went to Riverside County (the numbers are rounded in the study). Applying the percentages from the 2010 survey to the approximately 50,000 truck trips per day generated by the ports yields a total of approximately 800 trucks per day between the ports and Riverside County.

If we make the conservative assumption that every one of these 800 truck trips goes to a warehouse rather than to a factory, store, or some other destination, and divide these trips among the 136 million square feet of occupied warehouse space in Riverside County, we find an average of 5.9 truck trips to or from the ports per million square feet of warehouse space per day. Applying this rate to the 40.6 million square feet of warehouse space proposed for the WLC yields 240 truck trips per day between the ports and the WLC if the WLC were built today (the 2012 Plus Full Build-Out scenario).

- ***Method 3: Based on Truck Flows from Riverside County.*** The best information currently available on regional truck traffic patterns comes from SCAG's Goods Movement Study that was done in preparation for the 2012 RTP/SCS.

Applying the ports' 1.5 percent share of Riverside County truck trips applies to WLC's 11,600 medium and heavy truck trips per day yields 174 truck trips per day between the ports and the WLC if the WLC were built today (the 2012 Plus Full Build-Out scenario).

This analysis shows that a reasonable estimate of truck traffic between WLC and the ports would be in the range of 84 to 240 truck trips per day. The higher figure of 240 truck trips per day was used as a reasonable worst-case scenario.

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Growth in Truck Trips to the Port. Some comments suggested that the analysis should consider the possibility that the share of warehouse space in the Inland Empire, and by extension the WLC, may grow over time. This section addresses those comments.

As discussed previously, currently only 1.5 percent of the truck trips in Riverside County are to or from the ports. In the future, port-related uses are anticipated to require a greater share of warehouse space. For Riverside County, SCAG estimates that the percentage of warehouse space devoted to port uses would more than triple between 2012 and 2035, from 5.0 percent to 16.3 percent.

The SCAG estimates show that the percentage of warehouse space devoted to port-related cargo will always be larger than the percentage of trucks going to and from the port. That is because the cargo that has come from the port to the warehouse then leaves the warehouse in trucks going to non-port destinations. There may also be inbound truck trips to warehouses from places other than the ports, delivering shipments of packaging material and other items which might be combined with port-related cargo, thus further reducing the proportion of trucks that come from the ports.

The estimated percentage of WLC trucks going to the ports is 2.07 for the Year 2012 scenario, 3.86 for the Year 2022 scenario, and 6.76 for the Year 2035 scenario. These estimates are based on 240 project truck trips per day to the port compared to 11,621 total medium and heavy truck trips to and from the WLC in the year 2012 scenario.

These percentages were then applied to the trip generation rates to obtain the number of WLC trucks to and from the port for each analysis period. The estimated quantity of WLC trucks going to the ports per day is 242 for the Year 2012 scenario, 254 for the Year 2022 scenario, and 786 for the Year 2035 scenario. Tests with the SCAG traffic model showed that these trips would split approximately evenly between SR-60 and SR-91 routes.

Determination of Whether Impacts are Significant. The potential for traffic impacts along the SR-60 and SR-91 corridors was assessed by manually adding the forecasts for WLC trucks to and from the port to the No-Project condition from the SCAG model. Because the ports and the freeways leading to them are in Los Angeles County, the threshold of significance for the analysis was taken from the Los Angeles County Congestion Management Program (CMP). The CMP states that a significant impact would be deemed to occur if the project increased demand on a highway by at least 2 percent causing LOS F or, if the highway facility already operates at LOS F, then a significant impact would be deemed to occur if the project increases traffic demand by 2 percent or more of capacity.

Analysis of the project's impacts to each section of the SR-60 and SR-91 corridors and in each direction, for both the a.m. and p.m. peak periods, was conducted for the 2012, 2022, and 2035 scenarios. The addition of the WLC traffic would increase freeway traffic volume ranging from 0.05 percent to 1.17 percent of non-project traffic, would not cause a significant impact on any segment of these freeways.

4.15.7 Mitigation of Significant Impacts

As described in detail in Section 4.15.4, the level of service performance standards used in this EIR are as follows:

- Roadway segments and intersections: LOS C, LOS D, or LOS E as outlined in previously referenced Tables 4.15.B, 4.15.C, and 4.15.D.

- Freeway mainline: LOS D (or existing density if currently operating at LOS E or F).
- Freeway Ramp Merge/Diverge: LOS D.

The methodology used to identify mitigation measures included:

- 1) Determining whether the LOS exceeded the target threshold in the Plus Project condition.
- 2) If so, then determining whether the appropriate measure of effectiveness under Plus Project conditions was below that under No Project conditions. Some study freeway segments were found to exceed the threshold of significance under Plus Project conditions but the traffic density was lower under Plus Project conditions than No Project conditions. This could happen because the project would cause some commuters to switch from the peak direction to the off-peak direction, thus reducing congestion at some locations. The project's impacts (both project direct and cumulative impacts) were considered significant only when the Plus Project condition was worse than the No-Project condition.
- 3) If the project had a significant impact, capacity-increasing improvements were then added incrementally until the LOS was within the target threshold of significance.
- 4) For cumulative impacts, determining whether the mitigations could be funded as part of an established fee program such as TUMF or DIF. If so, then payment into the TUMF or DIF program constitutes mitigation of impacts to the TUMF and DIF facilities.
- 5) For improvements that would not be funded from an established fee program the project's fair-share contribution was computed using the formula in Caltrans' *Guide for the Preparation of Traffic Impact Studies - Appendix "B"*. This formula defines the project's fair-share as the project-related traffic's percentage share of overall traffic growth, not including new traffic attributable to projects that have already been approved. Where there were significant impacts in both the a.m. and p.m. peak periods, the period with the higher share of project traffic was used to determine the fair-share contribution.

Potential mitigation measures were analyzed to determine whether they were feasible or not. Improvements were deemed to be infeasible if they would require the acquisition of existing homes or businesses, if they would result in excessive air, noise, or vibration impacts on existing homes, businesses, or sensitive natural environments, or would create safety impacts that could be considered less acceptable than a reduced traffic LOS. In cases where feasibility is uncertain, the recommended improvement was treated as feasible in order to produce a conservative estimate of project responsibilities (i.e. "conservative" in the sense that the project's responsibilities would not be under-estimated).

In cases where a proposed modification to an existing intersection would result in the elimination of an existing bus stop or bicycle lane the proposed mitigation would include the replacement of the bicycle lane or bus stop even if not explicitly stated. This is also true of the replacement of existing curbs, gutters, sidewalks, lights, and other existing design features.

Timing of Improvements. It is important to note that the specific timing of installation of the various identified improvements will occur as indicated by subsequent traffic studies when specific development is proposed in the future, as outlined in Mitigation Measure 4.15.7.4A. It is therefore not possible at this time, in this programmatic document, to identify the specific timing of roadway or other circulation improvements identified in this document.

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4.15.7.1 The TUMF Program

In 1988, the voters of Riverside County approved Measure A, a half-cent sales tax to fund transportation projects. In 2002, voters approved a 20-year extension of Measure A, this time including a Transportation Uniform Mitigation Fee or TUMF. The rationale behind TUMF was that having a single uniform fee program to mitigate the cumulative regional impacts of new development on the area's arterial highway system would be more effective than having multiple and potentially uncoordinated fee programs with varying policies, fee amounts, and project lists. Under the TUMF, developers of residential, industrial, and commercial property pay a development fee to fund transportation projects that will be required as a result of the growth the projects create. The program is recognition by voters that residents and employees in all of Western Riverside County's jurisdictions benefit from arterials located not just in their own city, but also in nearby cities as well.

The TUMF program is designed to provide a network of roads, bridges, interchanges, and railroad grade separations, known as the Regional System of Highways and Arterials (RSHA), needed to accommodate future growth in the area through 2035. The RSHA was developed by the Public Works Directors of the Western Riverside Council of Governments (WRCOG) member jurisdiction. A "Nexus Study" was then prepared in accordance with the California Mitigation Fee Act, which requires that a reasonable relationship exist between the impact fee collected and the proposed improvements for which a fee is used. The study determined the proportion of the cost of the improvements should be borne by different types of development based on the trip generating characteristics of each land use type. The Nexus Study was updated in 2010 and the RSHA was revised to reflect the most current transportation needs and costs for Western Riverside County. The new network reflected several changes due to completed projects and recommendations from the WRCOG Public Works Committee (PWC) to better represent the transportation needs of Western Riverside County.

TUMF is administered by the WRCOG. As administrator, WRCOG receives all fees generated from the TUMF as collected by the local jurisdictions. TUMF funds are programmed by WRCOG's partner agencies, which are responsible for prioritizing projects and overseeing their development.

The TUMF program uses six categories of land uses: two residential categories and four non-residential categories. The two residential types are single-family residential and multifamily residential. Non-residential uses are industrial, retail, service commercial, and high-cube warehouse, with fees assessed at different rates depending on the category. The high-cube warehouses in the WLC would fall into the "high-cube" category of non-residential development. As this fee level, if the WLC builds out completely, it would potentially pay more than \$70 million in TUMFs.

TUMF revenues are collected when a development reaches the Building Permit stage. Once collected and administrative costs and a mitigation allocation made to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), TUMF revenues are allocated as follows:

- 46.39 percent is allocated for regional improvements. These revenues are programmed by the RCTC pursuant to an agreement with WRCOG.
- 46.39 percent is allocated to the geographic zone from which the fees are collected. Project prioritization and programming are undertaken by the jurisdictions in each of the five zones.
- 1.64 percent is allocated for regional transit projects. WRCOG administers the funds on behalf of the RTA which prioritizes and programs capital transit projects.
- 1.59 percent is allocated to the Multiple Species Habitat Conservation Plan.
- 4.0 percent is used for program administration.

Since its inception, TUMF has collected more than \$554 million in revenues, making it the largest multi-jurisdictional fee program in the nation. It has completed 46 projects with several dozen more under development. The projects successfully funded by the program include a variety of road widening, intersection improvements, and freeway interchanges, including:

- Widening Pigeon Pass Road from 2 lanes to 4 lanes from Climbing Rose Drive to Hidden Springs Drive;
- Widening the Ramona Expressway from 2 lanes to 6 lanes from I-215 to Evans Road;
- Improvements to the Ironwood Avenue/Moreno Beach Drive intersection;
- Improvements to the Ironwood Avenue/Nason Street intersection;
- Adding a northbound lane to Lasselle Street from John F Kennedy Drive to Alessandro Boulevard;
- Widening Oleander Avenue from Perris Boulevard to Indian Avenue;
- The Van Buren Boulevard/SR-91 Interchange Project;
- Widening State Street in Hemet from 2 to 4 lanes with a center turn lane; and
- Widening Sanderson Avenue from Menlo Avenue to Ramona Expressway.

This track record of success is a key reason why the TUMF projects have a good probability of being implemented. Between now and 2035, when the program is scheduled for completion, the TUMF program is forecast to provide nearly \$1.9 billion towards a total of \$4.2 billion in arterial road, bridge, intersection, and interchange improvements in Western Riverside County. Those components of infrastructure that are subject to and included in the TUMF program are identified in the TIA and this Traffic and Circulation section of the EIR.

4.15.7.2 The City of Moreno Valley Development Impact Fee Program

The City of Moreno Valley's Development Impact Fee (DIF) program is used to fund road and intersection improvements needed to accommodate new residential, commercial, and industrial development. The program collects fees from three categories of residential development (single-family, multifamily, and mobile homes) and five categories of commercial development (general commercial, regional commercial, general industrial, high-cube warehouse, and office) based on their respective trip generating characteristics. In many cases, developers dedicate right-of-way and/or construct improvements that are part of the TUMF or DIF programs in lieu of paying the fees. These facilities are typically part of a project's direct frontage or are necessary to accommodate traffic capacities in the immediate area of the project. DIF fees on high-cube warehouses are currently set at \$0.9955 per square foot, which means that the WLC would potentially pay more than \$40 million in DIF fees if the project builds out completely as planned. Like the TUMF Program, the City's DIF Program is a bona-fide Mitigation Fee Program that has been created in accordance with AB 1600. All development is required to pay into the DIF Program; funds raised pursuant to the DIF Program are held in a separate interest-bearing account; an infrastructure capital improvement program is adopted that funds transportation improvements as they are needed to maintain targeted levels of service; and the capital improvement program is implemented as development occurs and DIF fees are collected.

DIF funds are overseen by the City's Public Works Department. Department staff monitors traffic volumes and periodically develops a capital improvement program designed to ensure that improvements are installed to help maintain the City's target LOS threshold. The CIP is reviewed and approved by the city council. Examples of projects successfully completed using DIF funds include:

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- Iris Ave. from Indian St. to Perris Blvd.
- Lasselle St./Bay Ave. traffic signal
- Lasselle St./Cottonwood Ave. traffic signal
- Cactus Ave. eastbound improvements from I-215 to Veterans Way

Similar to the TUMF, this track record of success is a key reason why the DIF projects have a good probability of being implemented. The DIF program supplements the TUMF program by funding elements of the City’s General Plan Circulation Element not covered by TUMF and, in some projects, by providing funds for additional capacity beyond what the TUMF project will provide. The DIF program has been updated several times, most recently in January 2013, to reflect changes in priorities as development occurs in different parts of the City.

Table 4.15.AU shows a sample of transportation improvement projects from the City’s Capital Improvement Program that used DIF and/or TUMF funds in combination with other funding sources.

Table 4.15.AU: Projects Using DIF and TUMF in Combination with Other Funding Sources

Project	DIF Funds	TUMF Funds	Other Funds	Sources of Other Funds
Iron Avenue / Heacock Street to Perris Boulevard	\$1,509,420	\$72,413	\$57,358	2005 Lease Revenue Bonds
Nason Street / Cactus Avenue Street Improvements	\$9,272,000		\$15,910,845	Measure "A"; State-Local Partnership Program; General Fund; General City C.P.; Successor Agency Tax Revenue; Redevelopment Agency Cap. Proj.; Eastern Municipal Water District; Riverside County Flood Control; 2007 Taxable Lease Revenue Bonds
SR-60 / Moreno Beach Drive South Side of Interchange (Phase 1)		\$3,500,000	\$6,110,735	Successor Agency; Redevelopment Agency
SR-60 / Nason Street Interchange	\$740,000		\$13,285,777	Measure "A"; Federal Demonstration Funds; Demo Toll Credit - Const.; Surface Transportation Program Local (construction); Surface Transportation Program Local Toll Credit - Const.
Heacock Street South Extension		\$300,000	\$564,172	Measure "A"
Emergency Vehicle Pre-emption at 117 Traffic Signals	\$93,534		\$840,000	Highway Safety Improvement Program
Nason Street / Riverside County Regional Medical Center Main Driveway Traffic Signal	\$250,000		\$50,000	Measure "A"
Transportation Management Center	\$316,578		\$214,646	Air Quality Management
Lasselle Street / John F. Kennedy Drive to Alessandro Boulevard		\$2,757,886	\$1,058,143	2005 Lease Revenue Bonds
Kitching Street / Alessandro Boulevard to Gentian Avenue	\$11,903		\$1,639,854	2005 Lease Revenue Bonds
Pigeon Pass Road Widening / Climbing Rose Drive to North City Limits	\$462,239	\$679,953	\$22,664	Measure "A"
Total	\$12,655,674	\$7,310,252	\$39,754,194	
Percentage of Total	21%	12%	67%	

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

4.15.7.3 Required Improvements

Existing plus Project Direct and Cumulative Project Impacts. As individual projects within the WLC are processed, the City will require that each project do a traffic impact assessment in accordance with City guidelines. These project-level assessments will determine the timing of each transportation improvement measure and will ensure that the impact assumptions made in this programmatic EIR document are consistent with the analysis of potential impacts at the project-specific implementation stage.

This section is devoted to disclosing project impacts and identifying required improvements to improve the impacted location to within the applicable level of service standard. Each impacted facility is discussed in the text and the results are summarized in Tables AV through AY. These tables all follow a similar format which includes the following data fields (columns):

- (A) This field identifies the location of the impact.
- (B) This field identifies which agency has jurisdiction over the facility in question.
- (C) This field shows the agency's target LOS for the facility in question.
- (D) This field shows the LOS under Existing conditions. This is used to determine whether or not there is an existing deficiency.
- (E) This field shows the LOS under Existing Plus Project conditions. This is used to determine whether or not the project has a significant impact.
- (F) This field shows whether there is a significant impact. It is based on the thresholds of significance described in Chapter 4.
- (G) This field describes what improvements would be required to achieve the target LOS under Existing Plus Project conditions.
- (H) This field states whether the measure described in Column G is feasible or not. In some cases the needed improvements may not be feasible. For example, it may be infeasible to widen a road because doing so would cause major negative impacts to an adjacent neighborhood.
- (I) This field shows the LOS after all feasible mitigations have been implemented. If mitigation is infeasible then Column I will be the same as Column E.
- (J) This field states whether the impact would still be significant after all feasible mitigation measures have been implemented. For those facilities under the jurisdiction of the City of Moreno Valley (see Column B) a "No" in Column J indicates that the impact will be mitigated to a less than significant level. For those facilities outside the jurisdiction of the City of Moreno Valley, Column J indicates what would happen if the jurisdiction that controls the facility implements the recommended feasible mitigations. However, because the City of Moreno Valley cannot guarantee that the other agency will implement the needed improvement the City cannot guarantee that the impact will be mitigated to a less than significant level.
- (K) This field shows whether or not there is an existing deficiency. Generally speaking, under state law a developer is responsible for mitigating the impacts of their project but is not responsible for rectifying existing deficiencies that are the result of earlier projects. They need only pay a fair-share representing the portion of the deficiency that is attributable to their own project.
- (L) This field reports the action that the developers of the WLC will be required to take as a condition of approval.

PROJECT DIRECT IMPACTS (SHORT-TERM)

The direct impacts of the WLC project were determined by comparing the LOS of study facilities under Existing and Existing Plus Project conditions. The direct impacts of the project and the associated improvements necessary to obtain the target LOS are as follows.

Road Section Direct Impacts. The project's direct impacts on road sections are summarized in Table 4.15.AV. These impacts and the associated improvements necessary to obtain the target LOS would be:

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- **Cactus Avenue from Redlands Boulevard to Street D (S-22)** currently has one westbound lane and two eastbound lanes. The WLC would involve the reconstruction of Alessandro Boulevard along a new alignment that ends Cactus Avenue Extension, which would connect Cactus Avenue and Alessandro Boulevard (Street E) as the main route for east-west through traffic. Cactus Avenue would need to be widened to four lanes in conjunction with this change. The City will require the developer to pay a fair share for this improvement as a condition of approval.
- **Gilman Springs Road from Alessandro Boulevard to Bridge Street (S-16)** is already deficient and needs to be widened to four lanes and will need to be widened to six lanes in the future. In accordance with General Plan Policy 5.5.7, the City will require the developer to widen Gilman Springs Road to provide three southbound lanes and one northbound lane along the frontage of the WLC project. The developer will receive a TUMF credit for the portion of the cost of this improvement that exceeds the project's fair share contribution.

However, because Gilman Springs Road is partially a Riverside County facility and is thus partially outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made outside of its jurisdiction. Moreover, there are right-of-way constraints involving sensitive environmental areas that may limit widening to four lanes between Alessandro Boulevard and Bridge Street, or even preclude any widening at all. The project's impacts in the Existing Plus Project scenario on Gilman Springs Road must therefore be considered significant and unavoidable. The City will work with Riverside County find funding for improvements that would provide an acceptable LOS on this road to the extent feasible.

- **Gilman Springs Road from SR-60 to Alessandro Boulevard (S-17)** is already deficient and needs to be widened to four lanes. In accordance with General Plan Policy 5.5.7, the City will require the developer to widen Gilman Springs Road to provide three southbound lanes and one northbound lane along the frontage of the WLC project. The developer will receive a TUMF credit for the portion of the cost of this improvement that exceeds the project's fair share contribution.

However, because Gilman Springs Road is partially a Riverside County facility and is thus partially outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made outside of its jurisdiction. The project's impacts in the Existing Plus Project scenario on Gilman Springs Road must therefore be considered significant and unavoidable. The City will work with Riverside County to find funding for improvements that would provide an acceptable LOS on this road to the extent feasible.

Intersection Direct Impacts. The project's direct impacts on study intersections are summarized in Table 4.15.AW. These impacts and the associated improvements necessary to obtain the target LOS would be:

- **Redlands Boulevard/Locust Avenue Intersection (IN-10)** already exceeds the LOS threshold in both the a.m. and p.m. peak hours and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Signalizing the intersection and adding left turn lanes on the eastbound and westbound approaches to the intersection would reduce project impacts to a less than significant level. The City will require the developer to pay a fair share contribution towards this improvement as a condition of approval.

Table 4.15.AV: Existing plus Project Direct Impacts and Mitigation Measures on Roadway Segments

Study Roadway	From (A)	To (B)	Jurisdiction (C)	LOS Standard* (D)	Existing LOS (E)	Does the Project Have a Significant Impact? (F)	Mitigation Measures Required to Reduce Project Impacts to Less than Significant (G)	Is Mitigation Feasible? (H)	LOS After Feasible Mitigations are Implemented (I)	Impact Significant After Mitigation? (J)	Is There an Existing Deficiency? (K)	Developer Action Required (L)
Road Section Direct Impacts that can be Mitigated to a Less than significant Level												
S-22	Cactus Ave.	Readlands Blvd Extension	Moreno Valley	C	A	Yes	Widen to 4 lanes	Yes	A	No	No	Pay fair share (95.9%)
Road Section Cumulative Impacts that are Considered Significant and Unavoidable (because they are not under the control of the City of Moreno Valley)												
S-16	Gilman Springs Rd	Alessandro Blvd (Street C)	Riverside County	D	F	Yes	Widen to 4 lanes	Yes	C	No	Yes	Pay fair share (12.2%)
S-17	Gilman Springs Rd	SF-60 Alessandro Blvd (Street C)	Riverside County	D	E	Yes	Widen to 4 lanes	Yes	C	No	Yes	Pay fair share (17.9%)

* LOS standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways.

Indicates LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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- **Redlands Boulevard/SR-60 Westbound Ramps Intersection (IN-13)** already exceeds the LOS threshold in both the a.m. and p.m. peak hours and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Signalizing the intersection and adding a right turn lane on the northbound approach to the intersection would reduce project impacts to a less than significant level. It should be noted that the National Bridge Inventory 2012 Inspection Database⁵ indicates that the Redlands Boulevard bridge over SR-60 was designed for MS18/HS20 design loads and has a sufficiency rating for 94.5. The City will require the developer to pay a fair share contribution towards this improvement as a condition of approval.
- **Oliver Street/Alessandro Boulevard Intersection (IN-20)** already exceeds the LOS threshold in the a.m. peak hour and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Changing from side-street stop control to all-way stop control would reduce project impacts to a less than significant level. The City will require the developer to pay a fair share contribution towards this improvement as a condition of approval.
- **Redlands Boulevard/Cactus Avenue Intersection (IN-27)** currently operates within the LOS threshold but would exceed the threshold in both the a.m. and p.m. peak hour under Existing Plus Project conditions. Signalizing the intersection and adding left turn lanes on the eastbound and westbound approaches to the intersection would reduce direct project impacts to a less than significant level. The City will require the developer to pay a fair share contribution towards this improvement as a condition of approval.
- **Moreno Beach Drive/John Kennedy Drive Intersection (IN-28)** currently operates within the LOS threshold but would exceed the threshold in the p.m. peak hour under Existing Plus Project conditions. Adding a westbound left-turn lane would reduce direct project impacts to a less than significant level. The City will require the developer to pay a fair share contribution towards this improvement as a condition of approval.
- **Moreno Beach Drive/Ironwood Avenue Intersection (IN-36)** currently operates within the LOS threshold but would exceed the threshold in the a.m. peak hour under Existing Plus Project conditions. Adding a northbound right-turn lane would reduce direct project impacts to a less than significant level. The City will require the developer to pay a fair share contribution towards this improvement as a condition of approval.
- **Moreno Beach Drive/SR-60 Eastbound Ramps Intersection (IN-37)** already exceeds the LOS threshold in the p.m. peak hour and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Adding an eastbound right-turn lane would reduce project impacts to a less than significant level. At the time of publication, improvements were already being made to the intersection.
- **Lasselle Street/Cactus Avenue Intersection (IN-53)** already exceeds the LOS threshold in both the a.m. and p.m. peak hours and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Constructing an additional lane for the westbound left turn, northbound left turn, and southbound left turn, and modifying the traffic signal to provide overlap phasing for northbound right turns and eastbound right turns would reduce cumulative project impacts to a less than significant level. The City will require the developer to pay a fair share contribution towards this improvement as a condition of approval.
- **Arlington Avenue/Victoria Avenue Intersection (IN-94)** currently operates within the LOS threshold but would exceed the threshold in the a.m. peak hour under Existing Plus Project conditions. Adding an additional westbound left-turn lane would reduce direct project impacts to a less than significant level.

⁵ <http://nationalbridges.com/> Federal Highway Administration, searchable database last updated 2012

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This intersection is under the jurisdiction of the City of Riverside. The City of Moreno Valley will require the developer to pay a fair share contribution towards this improvement as a condition of approval. However, because the intersection is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside to develop a mechanism for implementing improvements that would provide an acceptable LOS at this intersection.

- **Alessandro Boulevard/Chicago Avenue intersection (IN-95)** is already built out to near the practical limit before grade separation is required (it has five lanes for each approach). Despite this, it already operates at LOS "E" in the p.m. peak period and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. To achieve the target LOS under Existing Plus Project conditions, the addition of another northbound left-turn lane (with adjusted signal timing) would be required.

This intersection is under the jurisdiction of the City of Riverside. The City of Moreno Valley will require the developer to pay a fair-share contribution towards this improvement as a condition of approval. However, because this intersection is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside to develop a mechanism for implementing improvements that would provide an acceptable LOS at this intersection.

- **Bridge Street/Ramona Expressway Intersection (IN-122)** currently operates within the LOS threshold but would exceed the threshold in the a.m. and p.m. peak hours under Existing Plus Project conditions. Signalizing the intersection would reduce direct project impacts to a less than significant level. However, there is a plan to close this intersection in the future and replace it with a grade-separated crossing west of the current location as part of the Villages of Lakeview project. It may not be worthwhile to signalize this intersection for only a few years before closing it.

This intersection is under the jurisdiction of the Riverside County. However, because the intersection is outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with Riverside County to develop a mechanism for implementing improvements that would provide an acceptable LOS at this intersection.

- **Gilman Springs Road/Bridge Street Intersection (IN-123)** already exceeds the LOS threshold in a.m. peak hour and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Signalizing this intersection would reduce project impacts to a less than significant level.

This intersection is under the jurisdiction of Riverside County. The City will require the developer to pay a fair share contribution towards this improvement as a condition of approval. However, because the intersection is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with Riverside County to develop a mechanism for implementing improvements that would provide an acceptable LOS at this intersection.

Table 4.15-AW: Existing plus Project Direct Impacts and Mitigation Measures on Intersections

Study Intersection	Jurisdiction	LOS Standard	Existing Conditions			Existing Plus Build-out			Does the Project Have a Significant Impact?	Mitigation Measures Required to Reduce Impacts to Less-Than-Significant	Is Mitigation Feasible?	LOS After Feasible Mitigations are Implemented			Impact Significant After Feasible Mitigations are Implemented?	Is There an Existing Deficiency?	Developer Action Required	
			AM	PM	PMI	AM	PM	PMI				AM LOS	PM LOS	PMI LOS				
Intersection Direct Impacts that can be Mitigated to a Less-Than-Significant Level																		
(A)	(B)	(C)	(D)			(E)			(F)	(G)	(H)	(I)			(J)	(K)	(L)	
IN-10	Redlands Blvd/Locust Ave	C	D	E	F	F	F	F	Yes	Signalize, Add 1 EB LT and 1 WB LT.	Yes	A	A	No	Yes	Implement improvement, with reimbursement agreement based on fair share contribution (34.8%)		
IN-13	Redlands Blvd/SR-60 WB ramps	D	E	F	E	F	F	Yes	Signalize, Add 1 NB RT.	Yes	B	B	No	Yes	Implement improvement, with reimbursement agreement based on fair share contribution (49.6%)			
IN-20	Oliver Str/Alessandro Blvd	C	D	B	F	C	C	Yes	Change to AWS.	Yes	C	B	No	Yes	Implement improvement, with reimbursement agreement based on fair share contribution (11.5%)			
IN-27	Redlands Blvd/Cactus Ave	C	B	A	F	F	F	Yes	Signalize, Add 1 EB LT, 1 WB LT.	Yes	B	B	No	No	Implement improvement, with reimbursement agreement based on fair share contribution (60.7%)			
IN-28	Moreno Beach Dr/John Kennedy Dr	D	B	B	C	F	F	Yes	Add 1 WB LT Lane.	Yes	B	B	No	No	Implement improvement, with reimbursement agreement based on fair share contribution (36.3%)			
IN-36	Moreno Beach Dr/SR-60 EB Ramps	D	D	D	E	D	D	Yes	Add 1 NB RT lane.	Yes	D	D	No	No	Implement improvement, with reimbursement agreement based on fair share contribution (14.9%)			
IN-37	Moreno Beach Dr/SR-60 EB Ramps	D	D	E	D	F	F	Yes	Add 1 EB RT lane.	Yes	C	C	No	Yes	N/A*			
IN-53	Lasselle Str/Cactus Ave	C	D	D	D	D	D	Yes	Add 1 WB LT, 1 NB LT, 1 SB LT, Add overlap phase for NB and EB RT.	Yes	D	C	No	Yes	Implement improvement, with reimbursement agreement based on fair share contribution (46.2%)			
Intersection Direct Impacts that are Considered Significant and Unavoidable (either because they are not under the control of the City of Moreno Valley or because mitigation is infeasible)																		
IN-94	Arlington Ave/Victoria Ave	D	D	C	E	C	C	Yes	Add WB LT lane	Yes	D	C	No	No	No	Pay fair share (7.5%)		
IN-95	Alessandro Blvd/Chicago Ave	D	D	E	D	E	E	Yes	Add NB LT lane, adjust signal timings.	Yes	D	D	No	Yes	Yes	Pay fair share (10.3%)		
IN-122	Bridge St/Ramona Expy	C	C	C	D	D	D	This intersection is due to be closed in the near future and replaced by a grade separated intersection further west. No improvements are warranted										
IN-123	Gilman Springs Rd/Bridge Str	C	D	C	E	D	D	Yes	Signalize.	Yes	A	A	No	Yes	Yes	Pay fair share (25.7%)		
IN-124	SR-79(Sanderson Ave) NB/Gilman Springs Rd	C	D	D	F	E	E	Yes	Signalize.	Yes	A	A	No	Yes	Yes	Pay fair share (13.6%)		
IN-125	SR-79(Sanderson Ave) SB/Gilman Springs Rd	C	D	E	E	F	F	Yes	Signalize.	Yes	A	A	No	Yes	Yes	Pay fair share (20.7%)		
IN-132	San Timoteo Canyon Rd/Alessandro Rd	D	F	C	F	F	F	Yes	Signalize.	Yes	D	B	No	Yes	Yes	Pay fair share (33.6%)		
IN-133	San Timoteo Canyon Rd/Live Oak Canyon Rd	C	F	F	F	F	F	Yes	Signalize.	Yes	B	B	No	Yes	Yes	Pay fair share (32.1%)		
IN-134	Redlands Blvd/San Timoteo Canyon Rd	C	F	F	F	F	F	Yes	Signalize, Add 1 EB RT. Also add EB RT overlap phase.	Yes	A	A	No	Yes	Yes	Pay fair share (34.1%)		

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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- **SR-79 (Sanderson Avenue) Northbound/Gilman Springs Road Intersection (IN-124)** already exceeds the LOS threshold in both the a.m. and p.m. peak hours and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Signalizing this intersection would reduce project impacts to a less than significant level.

This intersection is under the jurisdiction of the Riverside County. The City will require the developer to pay a fair-share contribution towards improvement of this intersection as a condition of approval. However, because intersection is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the County of Riverside to develop a mechanism for implementing improvements that would provide an acceptable LOS at this intersection.

- **SR-79 (Sanderson Avenue) Southbound/Gilman Springs Road Intersection (IN-125)** already exceeds the LOS threshold in both the a.m. and p.m. peak hours and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Signalizing this intersection would reduce project impacts to a less than significant level.

This intersection is under the jurisdiction of Riverside County. The City will require the developer to pay a fair-share contribution towards improvement of this intersection as a condition of approval. However, because intersection is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable.

- **San Timoteo Canyon Road/Alessandro Road Intersection (IN-132)** already exceeds the LOS threshold in the a.m. peak hour and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Signalizing this intersection would reduce project impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Redlands. The City will require the developer to pay a fair-share contribution towards this improvement as a condition of approval. However, because the intersection is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Redlands to develop a mechanism for implementing improvements that would provide an acceptable LOS at this intersection.

- **San Timoteo Canyon Road/Live Oak Canyon Road Intersection (IN-133)** already exceeds the LOS threshold in both the a.m. and p.m. peak hours and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Signalizing this intersection would reduce project impacts to a less than significant level.

This intersection is under the jurisdiction of Riverside County. The City will require the developer to pay a fair-share contribution towards improvement of this intersection as a condition of approval. However, because intersection is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable.

- **Redlands Boulevard/San Timoteo Canyon Road Intersection (IN-134)** already exceeds the LOS threshold in both the a.m. and p.m. peak hours and traffic using the intersection would experience longer delays resulting in an impact in the Existing Plus Project scenario. Signalizing this intersection and adding an eastbound right-turn storage lane with an overlap phase would reduce project impacts to a less than significant level.

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This intersection is under the jurisdiction of Riverside County. The City will require the developer to pay a fair-share contribution towards improvement of this intersection as a condition of approval. However, because intersection is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable.

Freeway Direct Impacts. Unlike the surface streets, where intersection improvements are generally both feasible and desirable, the strategic situation for freeways in western Riverside County is such that major freeway improvements are becoming increasingly problematic over time. A key problem is that the rights-of way are essentially built out in many locations and cannot be expanded without severe impacts to existing communities (loss of homes and businesses, visual intrusion, increased noise and air quality impacts, etc.) and high costs to replace overcrossing structures. Moreover, there is a growing consensus that over-provision of freeway capacity facilitates long-distance commuting by car and leads to more auto-oriented residential development on the urban fringe, which in turn increases greenhouse gas emissions. This has resulted in a policy shift away from continued expansion of the freeway system, as reflected, for example, in the Riverside County Transportation Commission Ordinance No. 02-001 which reads in part:

“State Routes 91 and 60 and Interstate Routes 15 and 215 cannot cost effectively be widened enough to provide for the traffic expected as Riverside County continues to grow. In addition to the specific highway improvements listed in Section 1 above, congestion relief for these highways will require that new north–south and east-west transportation corridors will have to be developed to provide mobility within Riverside County and between Riverside County and its neighboring Orange and San Bernardino Counties.”

In other words, as a matter of policy, with the exception of spot improvements in some specific locations, the overall strategy to relieve congestion on SR-60 and SR-91 is to improve the capacity of surface streets that could serve as alternate routes to freeways. The policy to forego further widening of some sections of SR-60 and SR-91 is also noted in the Riverside County Congestion Management Program (CMP) which permits LOS F for some of the study freeway sections because those sections already operated at LOS F when the CMP was established in 1991. For these reasons, some of the identified mitigation measures may not be pursued even if they are deemed feasible in an engineering sense. In such cases, the project's payment into the TUMF and DIF programs and funding for the surface street improvements would constitute their mitigation because they help create viable alternative routes that would substitute for freeway travel for some trips. For the purposes of this EIR, however, impacts to freeways were treated as significant and unavoidable.

The project's direct impacts on the regional freeway system are summarized in Table 4.15.AX. These impacts and the associated improvements necessary to obtain the target LOS would be:

- **Direct Impacts on Freeway Mainline Basic Sections**

- *Eastbound SR-60 from Euclid Avenue to Grove Avenue (F-6)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. The addition of a lane is identified in the Transportation Concept Report.⁶

SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution towards improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City

⁶ A transportation concept report is Caltrans' analysis of long-range demand for a highway.

of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this section must therefore be considered significant and unavoidable.

- *Eastbound SR-60 from Martin Luther King Boulevard to Central Avenue (F-24)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. The Transportation Concept Report does not call for further widening of this section, because further widening could only be accomplished by eliminating the existing shoulder resulting in no space for disabled vehicles to pull over. Since this would create safety problems that would be less acceptable than a low LOS, mitigating this impact is infeasible. This impact is therefore significant and unavoidable.
- *Westbound SR-60 from I-215 to Day Street (F-27)* already exceeds the LOS threshold in the a.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution towards improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this section must therefore be considered significant and unavoidable.

Westbound SR-60 from Pigeon Pass Road/Frederick Street to Heacock Street (F-29) currently operates at an acceptable LOS but would exceed the LOS threshold in the p.m. peak hour under Existing Plus Project conditions. Adding a mixed-flow lane would bring the LOS to within the target threshold. The addition of a lane is identified in the Transportation Concept Report.

SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution towards improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this section must therefore be considered significant and unavoidable.

- *Westbound SR-91 from Pierce Street to Magnolia Avenue (F-41)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution towards improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this section must therefore be considered significant and unavoidable.

- *Westbound SR-91 from Magnolia Avenue to La Sierra Avenue (F-42)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within

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Table 4.15-AX: Existing Plus Project Freeway Impacts and Mitigations (note: this is a completely new table to replace previous Tables 4.15.AW, 4.15.AX, and 4.15.AY)

Study Facility	Jurisdiction	LOS Standard	Determination of Impact						Mitigation Measures Required to Reduce Impact to Less-Than-Significant	Is Mitigation Feasible?	LOS After Feasible Mitigations are Implemented			Impact Significant After Feasible Mitigations are Implemented?	Is There an Existing Deficiency?	Developer Action Required
			Existing		Existing Plus Build-out		Does the Project Have a Significant Impact?	LOS After Feasible Mitigations are Implemented								
			AM	PM	AM	PM		AM			PM	LOS				
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)					
Freeway Mainline Basic Sections - All Impacts are Considered Significant and Unavoidable (because they are not feasible, not part of an existing fee program, and/or not under the control of the City of Moreno Valley)																
F-6 EB SR-60 Euclid Ave to Grove Ave	Caltrans	D	D	E	E	Yes	Add one mixed flow lane.	Yes	D	D	No	Yes	Pay fair share (11.6%)			
F-24 EB SR-60 Martin Luther King Blvd to Central Ave	Caltrans	D	C	F	F	Yes	Add one mixed flow lane.	No	D	F	Yes	Yes	N/A*			
F-27 WB SR-60 I-215 to Day St	Caltrans	D	F	B	C	Yes	Add one mixed flow lane.	Yes	D	B	No	Yes	Pay fair share (52.7%)			
F-29 WB SR-60 Pigeon Pass Rd/Frederick St to Heacock St	Caltrans	D	C	D	C	Yes	Add one mixed flow lane.	Yes	B	C	No	No	Pay fair share (36.8%)			
F-41 WB SR-91 Pierce St to Magnolia Ave	Caltrans	D	C	F	C	Yes	Add one mixed flow lane.	Yes	B	D	No	Yes	Pay fair share (9.4%)			
F-42 WB SR-91 Magnolia Ave to La Sierra Ave	Caltrans	D	C	F	C	Yes	Add one mixed flow lane.	No	C	F	Yes	Yes	N/A*			
F-49 EB SR-91 Central Ave to 14th St	Caltrans	D	D	E	D	Yes	Add one mixed flow lane.	Yes	C	C	No	No	Pay fair share (3.3%)			
F-71 NB I-215 SR-74 to Redlands Ave	Caltrans	D	E	D	E	Yes	Add one mixed flow lane.	Yes	C	D	No	Yes	N/A**			
F-71 SB I-215 SR-74 to Redlands Ave	Caltrans	D	E	D	F	Yes	Add one mixed flow lane.	Yes	C	C	No	Yes	N/A**			
F-83 SB I-215 Baseline Rd to Highland Ave	Caltrans	D	E	F	F	Yes	Add one mixed flow lane.	Yes	C	C	No	Yes	N/A**			
Freeway Weaving Sections - All Impacts are Considered Significant and Unavoidable (because they are not feasible, not part of an existing fee program, and/or not under the control of the City of Moreno Valley)																
W-21 EB SR-60 SR-91 to Blaine SR3rd St	Caltrans	D	B	E	B	Yes	Add one mixed flow lane.	No	B	E	Yes	Yes	N/A*			
W-22 EB SR-60 Blaine SR3rd St to University Ave	Caltrans	D	B	E	C	Yes	Add a second off-ramp lane.	Yes	B	D	No	Yes	Pay fair share (10.1%)			
W-25 EB SR-60 Central Ave to Fair Isle Dr/Box Springs Rd	Caltrans	D	B	D	C	Yes	Add one mixed flow lane.	No	C	E	Yes	No	N/A*			
W-25 WB SR-60 Central Ave to Fair Isle Dr/Box Springs Rd	Caltrans	D	E	D	E	Yes	Add one mixed flow lane.	Yes	D	C	No	Yes	N/A**			
W-48 EB SR-91 Arlington Ave to Central Ave	Caltrans	D	E	B	E	Yes	Add a second off-ramp lane.	Yes	D	B	No	Yes	Pay fair share (6.3%)			
W-50 WB SR-91 14th to University Ave	Caltrans	D	C	E	C	Yes	Add a second off-ramp lane.	Yes	C	D	No	Yes	Pay fair share (6.0%)			
Freeway Ramps - All Impacts are Considered Significant and Unavoidable (because they are not feasible, not part of an existing fee program, and/or not under the control of the City of Moreno Valley)																
R-2 SR-60 EB On-Ramp from Central Ave	Caltrans	D	B	F	C	Yes	Add one mixed flow lane.	No	C	F	Yes	Yes	N/A*			

** Improvement identified in the current RTP and planned to be completed independent of the WLC project

* Not applicable because mitigation is infeasible

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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the target threshold. However, this could only be accomplished by eliminating the existing shoulder resulting in no space for disabled vehicles to pull over. Since this would create safety problems that would be less acceptable than a low LOS, mitigating this impact is infeasible. This impact is therefore significant and unavoidable.

- *Eastbound SR-91 from Central Avenue to 14th Street (F-49)* currently operates at an acceptable LOS but would exceed the LOS threshold in the a.m. peak hour under Existing Plus Project conditions. Adding a mixed-flow lane would bring the LOS to within the target threshold.

SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution toward improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this section must therefore be considered significant and unavoidable.

- *Northbound I-215 from SR-74/Case Road to Redlands Boulevard (F-71)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. The improvement is identified in the current SCAG RTP and planned to be completed by 2022 independent of the WLC project.
- *Southbound I-215 from SR-74/Case Road to Redlands Boulevard (F-71)* already exceeds the LOS threshold in the a.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. The improvement is identified in the current SCAG RTP and planned to be completed by 2022 independent of the WLC project.
- *Southbound I-215 from Baseline Road to Highland Avenue (F-83)* already exceeds the LOS threshold in both the a.m. and p.m. peak hours and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would reduce the impact to a less than significant level. The improvement is identified in the current SCAG RTP and planned to be completed by 2022 independent of the WLC project.

- ***Direct Impacts on Freeway Weaving Sections***

- *Eastbound SR-60 from SR-91 to W. Blaine Street/3rd Street (W-21)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The existing freeway right-of-way in this section cannot accommodate an additional lane and cannot be widened without impacting the adjacent residential community. Since widening the freeway is infeasible, this impact is significant and unavoidable.
- *Eastbound SR-60 from W Blaine Street/3rd Street to University Avenue (W-22)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a second off-ramp lane would bring the LOS to within the target threshold.

SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution towards improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified

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improvements would be made. The project's impacts on this section must therefore be considered significant and unavoidable.

- *Eastbound SR-60 from Central Avenue to Fair Isle Drive/Box Springs Road (W-25)* currently operates near capacity and the addition of the project would increase traffic above the target LOS threshold. Adding a mixed-flow lane would reduce the impact to a less than significant level. The existing freeway right-of-way in this section cannot accommodate an additional lane and cannot be widened without eliminating the adjacent frontage road. Since widening the freeway is infeasible, this impact is significant and unavoidable.

Westbound SR-60 from Central Avenue to Fair Isle Drive/Box Springs Road (W-25) already exceeds the LOS threshold in the a.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level and bring the LOS to within the target threshold. The improvement is identified in the current SCAG RTP and planned to be completed by 2022 independent of the WLC project.

- *Eastbound SR-91: Arlington Avenue to Central Avenue (W-48)* already exceeds the LOS threshold in the a.m. peak hour and traffic density would increase, resulting in an impact in the Existing Plus Project scenario. Adding a second off-ramp lane would bring the LOS to within the target threshold.

SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution towards improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this section must therefore be considered significant and unavoidable.

- *Westbound SR-91 from 14th Street to University Avenue (W-50)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a second off-ramp lane would reduce the impact to a less than significant level.

SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution towards improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impacts on this section must therefore be considered significant and unavoidable.

- **Direct Impacts on Freeway Ramps**

- *Eastbound SR-60 from On-Ramp from Central Avenue (R-2)* already exceeds the LOS threshold in the p.m. peak hour and traffic density would increase resulting in an impact in the Existing Plus Project scenario. Adding a mixed-flow lane would reduce the impact to a less than significant level. The existing freeway right-of-way in this section cannot accommodate an additional lane and cannot be widened without eliminating the adjacent frontage road. Since widening the freeway is infeasible, this impact is significant and unavoidable.

PROJECT CUMULATIVE IMPACTS (LONG-TERM)

The long-term cumulative impacts of the WLC project were determined by comparing the LOS of study facilities under 2035 No Project and 2035 Plus Project conditions.

The long-term cumulative impacts of the project and the associated improvement measures necessary to obtain the target LOS are described below. In cases where the facility had mitigation measures identified for direct (Existing Plus Project) impacts and requires additional improvements under cumulative conditions, the improvements described below are the improvements required beyond those described in the previous section on direct impacts.

Cumulative Impacts on Road Sections. The project's direct impacts on road sections are summarized in Table 4.15.AY. These impacts would be:

- ***Gilman Springs Road from Alessandro Boulevard to Bridge Street (S-16)*** should be widened from 2 lanes to 4 lanes in the short term (see previous section on direct impacts) and may need to be further widened from 4 lanes to 8 lanes sometime in the 2022–2035 timeframe. Gilman Springs Road is a TUMF facility. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because Gilman Springs Road is partially a Riverside County facility and is thus partially outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made outside of its jurisdiction. Moreover, there are right-of-way constraints involving sensitive environmental areas that may limit widening to six lanes between Alessandro Boulevard and Bridge Street, or even preclude any widening at all. The project's impacts on Gilman Springs Road must therefore be considered significant and unavoidable. The City will work with Riverside County and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS on this road to the extent feasible.

Cumulative Impacts on Study Intersections. The WLC project's cumulative impacts on study intersections are summarized in Table 4.15.AZ, and described in detail below:

- ***Redlands Boulevard/Ironwood Avenue Intersection (IN-11)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a second southbound left-turn lane would reduce cumulative impacts to a less than significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF funds in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.
- ***Theodore Street/Ironwood Avenue Intersection (IN-12)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Signalizing the intersection would reduce cumulative impacts to a less than significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF funds in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.
- ***Moreno Beach Drive/Cactus Avenue Intersection (IN-25)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a second eastbound left-turn lane would reduce cumulative impacts to a less than significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF funds in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.
- ***Redlands Boulevard/Cactus Avenue intersection (IN-27)*** requires signalization and the installation of eastbound and westbound left-turn lanes in the short term (see previous section on direct impacts) and may exceed the target LOS threshold at some point in the 2022-to 2035 period. Constructing a westbound left-turn lane would reduce project impacts to a less-than-significant level. The City will require the developer to pay a fair-share contribution towards this improvement as a condition of approval.

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Table 4.15.AY: Year 2035 Cumulative Impacts and Mitigation Measures on Roadway Segments (note: this is a completely new table to replace previous Tables 4.15.AZ)

Roadway	From	To	Jurisdiction	LOS Standard*	2035 No-Project LOS	2035 Plus Build-out LOS	Does the Project have a Significant Impact?	Mitigation Measures Required to Reduce Project Impacts to Less-Than-Significant	Is the Mitigation Feasible?	LOS After Feasible Mitigations are Implemented	Impact Significant After Feasible Mitigations are Implemented?	Is There an Existing Deficiency?	Developer Action Required	
Road Section Cumulative Impacts that are Considered Significant and Unavoidable (because they are not under the control of the City of Moreno Valley)														
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	
S-16	Gilman Springs Rd	Alessandro Blvd (Street C)	Bridge Street	Riverside County	D	D	F	Yes	Widen to 8 lanes	Partially (to 6 lanes)	F	Yes	Yes	Pay Fair Share (12.2%)

* LOS Standard is "C" in residential areas and "D" for roads in employment-generating areas or near freeways.
 ** WLC's impacts would already be mitigated with the measures identified for direct impacts.
 █ Indicates LOS exceeds the target level

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

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Table 4.15-AZ: Year 2035 Cumulative Intersection Impacts and Mitigation

Study Intersection	Jurisdiction	LOS Standard	2035 No-Project		2035 Plus Build-out		Does the Project Have a Significant Impact?	Measures Required to Reduce Impact to Less-Than-Significant	Is Mitigation Feasible?	LOS After Feasible Mitigations are Implemented			Impact Significant After Feasible Mitigations are Implemented?	TUMF Facility?	DIF Facility?	Developer Action Required
			AM	PM	AM	PM				AM LOS	PM LOS	LOS				
(A)	(B)	(C)	(D)		(E)		(F)	(G)	(H)	(I)			(J)	(K)	(L)	(M)
Intersection Cumulative Impacts that can be Mitigated to a Less-Than-Significant Level																
IN-11	Redlands Blvd/Ironwood Ave	D	D	D	D	D	Yes	Add 1 SB LT lane.	Yes	D	D	No	Yes	Yes	Pay DIF	
IN-12	Theodore Street/Ironwood Avenue	D	C	F	E	F	Yes	Signalize.	Yes	A	A	No	No	Yes	Pay DIF	
IN-25	Moreno Beach Dr/Cactus Ave	C	C	C	C	D	Yes	Add 1 EB LT lane.	Yes	B	C	No	No	Yes	Pay DIF	
IN-27	Redlands Blvd/Cactus Ave	C	B	B	F	F	Yes	Add 1 WB LT lane.	Yes	B	C	No	No	No	Pay fair share (60.7%)	
IN-35	Moreno Beach Dr/Locust Ave	C	D	E	D	F	Yes	Signalize. Add 1 WB LT lane.	Yes	A	B	No	Yes	Yes	Pay DIF	
IN-36	Moreno Beach Drive & Ironwood Avenue	D	D	D	D	E	Yes	Change N/S from split to protected LT phase. Add NB and SB LT lanes.	Yes	D	D	No	Yes	Yes	Pay DIF	
IN-37	Moreno Beach Dr/SR-60 EB Ramps	D	F	F	F	F	Yes	Change EB from 1 shared LT/TH to 1 LT and 1 TH. Add 1 SB LT lane. Change split phasing on E/W movement to protected LT phasing.	Yes	C	D	No	Yes	Yes	Pay DIF	
IN-39	Iris Ave/Perris Blvd	D	E	E	E	F	Yes	Add 1 WB LT and 1 SB LT lane.	Yes	D	D	No	Yes	Yes	Pay DIF	
IN-40	Kitching S/Tris Ave	C	E	F	E	F	Yes	Add 1 WB LT and change NB shared TH/RT to RT lane and add another RT lane. Provide overlap phase for NB RT. Add 1 EB TH lane.	Yes	C	C	No	No	No	Pay fair share (16%)	
IN-41	Lasselle Str/Iris Ave	D	C	E	D	F	Yes	Add 1 WB LT lane (resulting 3 turn lanes) and 1 EB RT. Need to widen Lasselle in the SB to have 3 receiving lanes.	Yes	C	D	No	Yes	No	Pay TUMF	
IN-57	Graham Str/Alessandro Blvd	D	D	F	D	F	Yes	Add 1 NB LT and 1 WB LT lanes.	Yes	C	D	No	Yes	Yes	Pay DIF	
IN-74	Elsworth Str/Cactus Ave	D	F	F	F	F	Yes	Widen NB approach and change NB lane geometry from: 1 LT and 1 shared LT/TH/RT lanes to 3 LTs and 1 TH and 1 RT. Add 1 WB LT and EB RT lanes.	Yes	D	D	No	Yes	Yes	Pay DIF	
Intersection Cumulative Impacts that are Considered Significant and Unavoidable (because they are not feasible, not under the control of the City of Moreno Valley, or are not part of an existing fee program)																
IN-66	Alessandro Blvd/Sycamore Canyon Blvd	D	D	F	D	F	Yes	Add SB RT overlap.	Yes	C	D	No	Yes	No	Pay TUMF	
IN-73	I-215 NB Ramps/Cactus Ave	D	E	F	E	F	Yes	Add 1 EB RT, 1 WB RT, 1 NB LT, and 1 SB LT lanes.	Yes	B	D	No	Yes	No	Pay TUMF	
IN-75	Central Ave/Lochmoor Dr.	D	B	E	B	F	Yes	Change NB approach to 1 LT and 1 shared LT/RT lane.	Yes	B	D	No	Yes	No	Pay TUMF	
IN-80	Alessandro Blvd/Mission Grove Pkwy	D	C	E	C	F	Yes	Add EB LT lane. Add WB LT lane. Add NB TH lane.	Yes	C	D	No	Yes	No	Pay TUMF	
IN-85	Marin Luther King Blvd/I-215 NB Ramps	D	E	C	E	C	Yes	Signalize.	Yes	B	A	No	No	No	Pay fair share (6.2%)	
IN-86	Central Ave/Chicago Ave	D	D	E	E	F	Yes	Add NB RT overlap.	Yes	C	D	No	Yes	No	Pay TUMF	
IN-88	Central Ave/Canyon Crest Dr	D	D	F	D	F	Yes	Change EB approach to 1 LT, 2 THs and 1 RT. Add WB LT lane. Add NB LT lane. Change SB approach to 2 LTs, 2 THs and 1 RT lane. Adjust splits.	Yes	D	D	No	Yes	No	Pay TUMF	
IN-90	Arlington Ave/Riverside Ave/SR-91 SB Ramps	D	D	E	D	E	Yes	Add SB LT lane.	Yes	C	D	No	Yes	No	Pay TUMF	
IN-94	Arlington Ave/Victoria Ave	D	F	F	F	F	Yes	Add EB TH lane. Add WB LT lane. Add WB TH lane. Add NB LT lane. Reconfigure SB approach to 3 LTs, 3 THs and 1 RT.	Yes	D	D	No	Yes	No	Pay TUMF	
IN-95	Alessandro Blvd/Chicago Ave	D	E	F	E	F	Yes	Reconfigure EB approach to 1 LT, 1 TH and 2 RTs. Add WB TH lane. Add NB LT and NB RT lane. Reconfigure SB approach to 1 LT, 3 THs and 1 shared TH/RT lane.	No	E	F	Yes	Yes	Yes	N/A*	
IN-98	Alessandro Blvd/Canyon Crest Dr	D	E	F	E	F	Yes		Yes	D	D	No	Yes	No	Pay TUMF	

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Table 4.15.AZ: Year 2035 Cumulative Intersection Impacts and Mitigation

Study Intersection	Jurisdiction	LOS Standard	2035 No-Project		2035 Plus Build-out		Does the Project Have a Significant Impact?	Measures Required to Reduce Impact to Less-Than-Significant	Is Mitigation Feasible?	LOS After Feasible Mitigations are Implemented		Impact Significant After Feasible Mitigations are Implemented?	TUMF Facility?	DIF Facility?	Developer Action Required
			AM	PM	AM	PM				AM LOS	PM LOS				
(A)	(B)	(C)	(D)		(E)		(F)	(G)	(H)	(I)		(J)	(K)	(L)	(M)
IN-101 Ramona Expy/Indian St	Perris	E	F	F	F	F	Yes	Add 1 EB RT lane. Add 2nd NB LT and 1 NB RT. Provide signal phase overlap for all RTs.	Yes	E	E	No**	Yes	No	Pay TUMF
IN-107 Evans Rd/Rider St	Perris	C	D	C	D	C	Yes	Reconfigure SB approach to include 1 LT, 2 THs and 1 RT.	Yes	C	C	No	Yes	No	Pay TUMF
IN-129 W 6th St/California Ave	Beaumont	C	F	F	F	F	Yes	Signalize.	Yes	B	C	No	Yes	No	Pay TUMF
IN-130 W 6th St/Beaumont Ave	Beaumont	C	D	F	D	F	Yes	Reconfigure EB approach to 2 LTs, 2 THs and 1 RT. Make EB/WB LT protected phasing. Add 1 WB LT and 1 WB TH lane. Reconfigure NB approach to 1 LT, 2 THs and 1 RT. Add SB LT.	Yes	C	C	No	Yes	No	Pay TUMF
IN-131 Reche Canyon Rd/Reche Vista Dr	Riverside County	C	D	F	D	F	Yes	Adjusted NB approach to a dedicated LT and a shared LT/RT lane.	Yes	B	C	No	Yes	No	Pay TUMF

Notes: "CSS" means cross-street is stop-controlled "RABT" means roundabout "NB" and "SB" denote northbound and southbound respectively "LT" and "RT" denote left turn and right turn respectively

"AWS" means all-way stop

* Not applicable because mitigation is infeasible

"EB" and "WB" denote eastbound and westbound respectively

"TH" denotes through lanes

Indicates LOS exceeds the target level

** The "Plus Build-out and Mitigations" condition is better than the "No-Project" condition

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Moreno Beach Drive/Locust Avenue Intersection (IN-35) will exceed the target LOS threshold at some point in the 2022–2035 period. Signalizing the intersection and constructing a westbound left-turn lane would reduce cumulative impacts to a less than significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF funds in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.

- **Moreno Beach Drive/Ironwood Avenue Intersection (IN-36)** will exceed the target LOS threshold at some point in the 2022–2035 period. Adding northbound and southbound left-turn lanes and changing north/south lefts from split to protected left-turn phase would reduce cumulative impacts to a less-than-significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF fees in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.
- **Moreno Beach Drive/SR-60 EB Ramps Intersection (IN-37)** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a southbound left-turn lane and changing the eastbound approach to one left-turn lane and one through lane would reduce cumulative impacts to a less than significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF funds in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.
- **Iris Avenue/Perris Boulevard Intersection (IN-39)** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a second westbound left-turn lane and a second southbound left-turn lane would reduce cumulative impacts to a less than significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF funds in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.
- **Kitching Street/Iris Avenue Intersection (IN-40)** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a third eastbound through lane, a second westbound left-turn lane, widening and reconfiguring the northbound approach to provide one left-turn lane, one through lanes, and two right-turn lanes, and modifying the traffic signal to provide overlap phasing for the northbound right-turn movement would reduce cumulative impacts to a less than significant level. The City will impose as a condition of approval that the WLC will provide fair-share funds to cover the cost of this improvement, which the City will use to construct the needed improvements.
- **Lasselle Street/Iris Avenue Intersection (IN-41)** will exceed the target LOS threshold at some point in the 2022–2035 period. Adding a third westbound left-turn lane and an eastbound right-turn lane would reduce cumulative impacts to a less than significant level. This improvement is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact.
- **Graham Street/Alessandro Boulevard Intersection (IN-57)** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a northbound left-turn lane and a westbound left-turn lane would reduce cumulative impacts to a less than significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF funds in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.
- **Alessandro Boulevard/Sycamore Canyon Boulevard Intersection (IN-66)** will exceed the target LOS threshold at some point in the 2022–2035 period. Providing a southbound right-turn overlap phase at the signal would reduce cumulative impacts to a less than significant level.

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This intersection is under the jurisdiction of the City of Riverside. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- ***I-215 NB Ramps/Cactus Avenue Intersection (IN-73)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing an eastbound right-turn lane, a westbound right-turn lane, a second northbound left-turn lane, and a second southbound left-turn lane would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the March AFB Joint Powers Authority. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the March AFB Joint Powers Authority and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- ***Elsworth Street/Cactus Avenue Intersection (IN-74)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Widening the northbound approach to provide three left-turn lanes, one through lane, and one right-turn lane, and adding a westbound left-turn lane and eastbound right-turn lane would reduce cumulative impacts to a less than significant level. This intersection is eligible for funds under the DIF program. The City will collect DIF funds in accordance with City Municipal Code 3.42.030 and 3.42.040, and use these fees to improve this intersection when the need for the improvement becomes warranted.
- ***Central Avenue/Lochmoor Drive Intersection (IN-75)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Converting the northbound approach to one left-turn lane and a shared left-right-turn lane would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Riverside. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- ***Alessandro Boulevard/Mission Grove Parkway Intersection (IN-80)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Modifying the traffic signal to provide an additional eastbound left-turn, westbound left-turn, and northbound through lane would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Riverside. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the

City of Riverside and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- ***Martin Luther King Boulevard/I-215 Northbound Ramps Intersection (IN-85)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Signalizing the intersection would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Riverside. It is not eligible for TUMF funding. The City will work with the City of Riverside to establish a mechanism for collecting and distributing payments from developers for inter-jurisdictional impacts not covered by the TUMF program. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable.

- ***Central Avenue/Chicago Avenue Intersection (IN-86)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Modifying the traffic signal to provide overlap phasing for the northbound right-turn movement would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Riverside. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- ***Central Avenue/Canyon Crest Drive Intersection (IN-88)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a southbound right-turn lane (and adjust signal timings), an eastbound right-turn lane, a second westbound left-turn lane, and a second northbound left-turn lane would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Riverside. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- ***Arlington Avenue/Riverside Avenue/SR-91 Southbound Ramps Intersection (IN-90)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a third southbound left-turn lane would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Riverside. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- ***Arlington Avenue/Victoria Avenue Intersection (IN-94)*** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a fourth eastbound through lane, a second

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westbound left-turn lane, and a second westbound right-turn lane would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Riverside. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- **Alessandro Boulevard/Chicago Avenue Intersection (IN-95).** This intersection is already built out to near the practical limit before grade separation is required (it has five lanes for each approach). Despite this, it already operates at LOS F in the p.m. peak period. To achieve the target LOS in 2035 would require the addition of lanes to the eastbound through, westbound left-turn, westbound through, northbound left-turn, southbound left-turn, and southbound right-turn movements. There are established residential communities on each corner that would be impacted by such a widening or by grade separation. These mitigation measures are thus likely to be infeasible, and the project impact at this location is therefore considered to be a significant and unavoidable.
- **Alessandro Boulevard/Canyon Crest Drive Intersection (IN-98)** will exceed the target LOS threshold at some point in the 2022–2035 period. Widening and reconfiguring the eastbound approach to provide one left-turn lane, one through lane, and two right-turn lanes; adding an additional westbound through lane; adding an additional northbound left-turn and northbound right-turn lane; and reconfiguring the southbound approach to one left-turn lane, three through lanes, and one shared through-right-turn lane would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Riverside. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Riverside and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- **Ramona Expressway/Indian Street Intersection (IN-101)** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing one eastbound right-turn lane, a second northbound left-turn lane, and one northbound right-turn lane, and modifying the traffic signal to provide overlap phasing for all right-turn movements would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Perris. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Perris and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- **Evans Road/Rider Street Intersection (IN-107)** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing an exclusive right-turn lane on the southbound approach would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Perris. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the City of Perris and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

- **W. 6th Street/California Avenue Intersection (IN-129)** will exceed the target LOS threshold at some point in the 2022–2035 period. Signalizing this intersection would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the City of Beaumont. Although it is a TUMF facility, signalization is not currently eligible for TUMF funding. The City will work with the City of Beaumont to establish a mechanism for collecting and distributing payments from developers for inter-jurisdictional impacts not covered by the TUMF program. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable.

- **W. 6th Street/Beaumont Avenue Intersection (IN-130)** will exceed the target LOS threshold at some point in the 2022–2035 period. Constructing a northbound right-turn lane, an eastbound right-turn lane, a second southbound left-turn lane, a second westbound left-turn lane, removing on-street parking and restriping to provide a second westbound through lane, modifying the traffic signal to provide protected phasing for eastbound and westbound left-turn movements, and overlap phasing for northbound and eastbound right-turn movements would reduce cumulative impacts to a less than significant level.

There are established commercial buildings on the corners on the northern part of the intersection that would be impacted by such a widening. These mitigation measures are thus infeasible, and the project impact at this location is therefore considered to be significant and unavoidable.

- **Reche Canyon Road/Reche Vista Drive Intersection (IN-131)** will exceed the target LOS threshold at some point in the 2022–2035 period. Converting the existing right-turn lane into a shared left-turn-and-right-turn lane would reduce cumulative impacts to a less than significant level.

This intersection is under the jurisdiction of the Riverside County. It is eligible for TUMF funding. The City will collect TUMF payments in accordance with Municipal Code Chapter 3.44, and payment of these fees will constitute the mitigation for this impact. However, because both the intersection and the funding source are outside the jurisdiction of the City of Moreno Valley, the City cannot ensure that the identified improvements would be made. The project's impacts on this intersection must therefore be considered significant and unavoidable. The City will work with the Riverside County and WRCOG to direct TUMF funding for improvements that would provide an acceptable LOS at this intersection when the need for the improvement becomes warranted.

Cumulative Freeway Mainline Mitigations. The WLC's cumulative impacts on the freeways system are summarized in Table 4.15.BA, and described in detail below:

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Table 4.15.BA: Year 2035 Cumulative Impacts and Mitigation Measures on Freeway Facilities

Study Facility	Jurisdiction	LOS Standard	Determination of Impact						Mitigation Measures Required to Reduce Impact to Less-Than-Significant	Is Mitigation Feasible?	LOS After Feasible Mitigations are Implemented			Impact Significant After Feasible Mitigations are Implemented?	Is There an Existing Deficiency?	Developer Action Required
			2035 No-Project		2035 Plus Build-out		Does the Project Have a Significant Impact?				LOS After Feasible Mitigations are Implemented					
			AM	PM	AM	PM	AM	PM			AM	PM	LOS			
Freeway Mainline Basic Sections - All impacts are considered significant and unavoidable (because they are not feasible, not part of an existing fee program, and/or not under the control of the City of Moreno Valley)																
F-2	EB SR-60 Reservoir St to Ramona Ave	Caltrans	D	E	E	E	E	Yes	Add one mixed flow lane.	Yes	D	D	No	No	Pay fair share (9.5%)	
F-2	WB SR-60 Reservoir St to Ramona Ave	Caltrans	D	E	D	E	E	Yes	Add one mixed flow lane.	Yes	D	C	No	Yes	Pay fair share (9.5%)	
F-3	EB SR-60 Ramona Ave to Central Ave	Caltrans	D	E	F	F	F	Yes	Add one mixed flow lane.	Yes	D	D	No	Yes	Pay fair share (9.5%)	
F-4	EB SR-60 Central Ave to Mountain Ave	Caltrans	D	E	F	F	F	Yes	Add one mixed flow lane.	Yes	D	E	No**	Yes	Pay fair share (10.1%)	
F-5	EB SR-60 Mountain Ave to Euclid Ave	Caltrans	D	E	D	F	D	Yes	Add one mixed flow lane.	Yes	D	C	No	No	Pay fair share (10.6%)	
F-5	WB SR-60 Mountain Ave to Euclid Ave	Caltrans	D	E	C	E	E	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (6.9%)	
F-6	WB SR-60 Euclid Ave to Grove Ave	Caltrans	D	E	C	E	E	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (8.0%)	
F-7	EB SR-60 Grove Ave to Vineyard Ave	Caltrans	D	F	F	F	F	Yes	Add one mixed flow lane.	Yes	D	E	No**	Yes	Pay fair share (11.3%)	
F-7	WB SR-60 Grove Ave to Vineyard Ave	Caltrans	D	E	C	E	E	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (8.5%)	
F-8	EB SR-60 Vineyard Ave to Archibald Ave	Caltrans	D	F	F	F	F	Yes	Add one mixed flow lane.	Yes	D	E	No**	Yes	Pay fair share (11.9%)	
F-9	EB SR-60 Archibald Ave to Haven Ave	Caltrans	D	E	D	E	D	Yes	Add one mixed flow lane.	Yes	D	C	No	No	Pay fair share (14.2%)	
F-17	EB SR-60 Valley Way to Rubidoux Blvd	Caltrans	D	E	C	E	C	Yes	Add one mixed flow lane.	Yes	D	B	No	No	Pay fair share (9.1%)	
F-17	WB SR-60 Valley Way to Rubidoux Blvd	Caltrans	D	C	E	C	E	Yes	Add one mixed flow lane.	Yes	B	C	No	No	Pay fair share (9.42%)	
F-18	EB SR-60 Rubidoux Blvd to Market St	Caltrans	D	E	C	F	C	Yes	Add one mixed flow lane.	Yes	D	B	No	No	Pay fair share (22.7%)	
F-19	EB SR-60 Market St to Main St	Caltrans	D	E	E	F	F	Yes	Add one mixed flow lane.	Yes	C	D	No	Yes	Pay fair share (20.9%)	
F-19	WB SR-60 Market St to Main St	Caltrans	D	D	E	D	E	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (8.7%)	
F-20	WB SR-60 Main to SR-91	Caltrans	D	D	E	D	E	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (8.9%)	
F-24	WB SR-60 Martin Luther King Blvd to Central Ave	Caltrans	D	D	D	D	E	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (18.3%)	
F-26	WB SR-60 Fair Isle Dr/Box Springs Rd to I-215	Caltrans	D	D	F	D	F	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (9.0%)	
F-29	EB SR-60 Pigeon Pass Rd/Frederick St to Heacock St	Caltrans	D	D	E	D	E	Yes	Add one mixed flow lane.	Yes	C	C	No	No	Pay fair share (19.5%)	
F-30	EB SR-60 Heacock St to Perris Blvd	Caltrans	D	D	D	D	E	Yes	Add one mixed flow lane.	Yes	C	C	No	No	Pay fair share (37.2%)	
F-34	WB SR-60 Redlands Blvd to Theodore St	Caltrans	D	E	D	E	E	Yes	Add one mixed flow lane.	Yes	C	C	No	No	Pay fair share (12.5%)	
F-36	EB SR-60 Gilman Springs Rd to Jack Rabbit Trail	Caltrans	D	C	F	C	F	Yes	Add one mixed flow lane.	Yes	B	D	No	No	Pay fair share (4.9%)	
F-37	EB SR-60 Jack Rabbit Trail to Potrero Blvd	Caltrans	D	C	F	C	F	Yes	Add one mixed flow lane.	Yes	B	D	No	No	Pay fair share (7.0%)	
F-41	EB SR-91 Pierce St to Magnolia Ave	Caltrans	D	E	E	E	E	Yes	Add one mixed flow lane.	Yes	D	C	No	No	Pay fair share (12.4%)	
F-43	EB SR-91 La Sierra Ave to Tyler St	Caltrans	D	E	E	E	E	Yes	Add one mixed flow lane.	Yes	C	C	No	No	Pay fair share (10.0%)	
F-43	WB SR-91 La Sierra Ave to Tyler St	Caltrans	D	E	D	E	D	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (10.9%)	
F-44	WB SR-91 Tyler St to Van Buren Blvd	Caltrans	D	E	D	E	D	Yes	Add one mixed flow lane.	Yes	C	D	No	No	Pay fair share (8.7%)	

* Indicates LOS exceeds the target level

** Not applicable because mitigation is infeasible

** Although the target LOS is not met, conditions with the project and the mitigation measure would be better than No-Project conditions

*** The mitigation measures are in addition to the mitigation measure needed for direct Project impacts (see Table 76)

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

Table 4.15.BA: Year 2035 Cumulative Impacts and Mitigation Measures on Freeway Facilities (continued)

Study Facility	Jurisdiction	LOS Standard	Determination of Impact						Mitigation Measures Required to Reduce Impact to Less-Than-Significant	Is Mitigation Feasible?	LOS After Feasible Mitigations are Implemented			Impact Significant After Feasible Mitigations are Implemented?	Is There an Existing Deficiency?	Developer Action Required
			2035 No-Project		2035 Plus Build-out		Does the Project Have a Significant Impact?	LOS After Feasible Mitigations are Implemented								
			AM	PM	AM	PM		AM			PM	LOS				
F-45 WB SR-91 Van Buren Blvd to Adam St	Caltrans	D	D	D	E	Yes	(G)	(H)	(I)	(J)	(K)	(L)	Pay fair share (8.2%)			
F-46 EB SR-91 Adam St to Madison St	Caltrans	D	E	C	C	Yes	Add one mixed flow lane.	No	E	C	Yes	N/A*	Pay fair share (4.9%)			
F-47 WB SR-91 Madison St to Arlington Ave	Caltrans	D	E	D	E	Yes	Add one mixed flow lane.	Yes	C	C	No	N/A*	Pay fair share (4.9%)			
F-48 WB SR-91 Center St to La Cadena Dr	Caltrans	D	E	C	E	Yes	Add one mixed flow lane.	No	E	C	Yes	N/A*	Pay fair share (4.9%)			
F-52 EB I-10 SR-60 to Beaumont Ave	Caltrans	D	C	E	C	Yes	Add one mixed flow lane.	Yes	B	D	No	Pay fair share (2.5%)	Pay fair share (2.9%)			
F-52 WB I-10 SR-60 to Beaumont Ave	Caltrans	D	E	C	E	Yes	Add one mixed flow lane.	Yes	C	C	No	Pay fair share (1.9%)	Pay fair share (1.9%)			
F-54 EB I-10 Pennsylvania Ave to Highland Springs Ave	Caltrans	D	C	E	C	Yes	Add one mixed flow lane.	Yes	B	D	No	Pay fair share (3.2%)	Pay fair share (3.2%)			
F-54 WB I-10 Pennsylvania Ave to Highland Springs Ave	Caltrans	D	E	C	E	Yes	Add one mixed flow lane.	Yes	D	C	No	Pay fair share (1.9%)	Pay fair share (1.9%)			
F-55 EB I-10 Highland Springs Ave to Sunset Ave	Caltrans	D	C	E	C	Yes	Add one mixed flow lane.	Yes	B	D	No	Pay fair share (0.7%)	Pay fair share (0.7%)			
F-55 WB I-10 Highland Springs Ave to Sunset Ave	Caltrans	D	E	C	E	Yes	Add one mixed flow lane.	Yes	D	B	No	Pay fair share (3.3%)	Pay fair share (3.3%)			
F-58 EB I-10 8th St to Hargrave St	Caltrans	D	C	C	E	Yes	Add one mixed flow lane.	Yes	B	C	No	Pay fair share (2.1%)	Pay fair share (2.1%)			
F-58 WB I-10 8th St to Hargrave St	Caltrans	D	E	C	E	Yes	Add one mixed flow lane.	Yes	C	B	No	Pay fair share (1.2%)	Pay fair share (1.2%)			
F-59 EB I-10 Hargrave St to Fields Rd	Caltrans	D	C	E	C	Yes	Add one mixed flow lane.	Yes	B	D	No	Pay fair share (1.9%)	Pay fair share (1.9%)			
F-59 WB I-10 Hargrave St to Fields Rd	Caltrans	D	E	B	E	Yes	Add one mixed flow lane.	Yes	B	C	No	Pay fair share (0.8%)	Pay fair share (0.8%)			
F-61 EB I-10 Morongo Trail to Main St	Caltrans	D	F	E	F	Yes	Add one mixed flow lane.***	Yes	F	D	Yes	N/A*	Pay fair share (0.8%)			
F-71 SB I-215 SR-74 to Ellis Ave	Caltrans	D	F	F	D	Yes	Add one mixed flow lane.***	No	F	D	Yes	N/A*	Pay fair share (0.8%)			
F-83 SB I-215 Baseline Rd to Highland Ave	Caltrans	D	F	D	F	Yes	Add one mixed flow lane.***	No	F	D	Yes	N/A*	Pay fair share (0.8%)			
Freeway Weaving Sections - All Impacts are Considered Significant and Unavoidable (because they are not feasible, not part of an existing fee program, and/or not under the control of the City of Moreno Valley)																
W-1 EB SR-60 SR-71/Garey Ave to Reservoir St	Caltrans	D	E	E	E	Yes	Add one mixed flow lane.	Yes	D	E	No**	Pay fair share (8.3%)	Pay fair share (8.3%)			
W-9 WB SR-60 Haven Ave to Archibald Ave	Caltrans	D	E	D	E	Yes	Add one mixed flow lane.	Yes	C	D	No	Pay fair share (6.1%)	Pay fair share (6.1%)			
W-20 EB SR-60 Main St to SR-91	Caltrans	D	E	E	E	Yes	Add one mixed flow lane.	Yes	C	C	No	Pay fair share (19.1%)	Pay fair share (19.1%)			
W-21 WB SR-60 SR-91 to Blaine St/3rd St	Caltrans	D	E	D	F	Yes	Add one mixed flow lane.	No	D	F	Yes	N/A*	Pay fair share (19.1%)			
W-22 WB SR-60 Blaine St/3rd St to University Ave	Caltrans	D	C	E	C	Yes	Add one mixed flow lane.	No	C	E	Yes	N/A*	Pay fair share (10.4%)			
W-23 WB SR-60 University Ave to Martin Luther King Blvd	Caltrans	D	E	D	E	Yes	Add a second off-ramp lane.	Yes	C	E	No**	Pay fair share (16.6%)	Pay fair share (16.6%)			
W-25 WB SR-60 Central Ave to Fair Isle Dr/Box Springs Rd	Caltrans	D	E	E	E	Yes	Add one mixed flow lane.***	Yes	D	E	No**	Pay fair share (35.6%)	Pay fair share (35.6%)			
W-28 WB SR-60 Day St to Pigeon Pass Rd/Frederick St	Caltrans	D	D	D	E	Yes	Add one mixed flow lane.	Yes	C	C	No	Pay fair share (35.6%)	Pay fair share (35.6%)			
Freeway Ramps - All Impacts are Considered Significant and Unavoidable (because they are not feasible, not part of an existing fee program, and/or not under the control of the City of Moreno Valley)																
R-1 SR-60 EB On-Ramp from Martin Luther King Blvd	Caltrans	D	D	D	E	Yes	Add one mixed flow lane.	No	D	E	Yes	N/A*	Pay fair share (8.3%)			
R-10 SR-60 EB On-Ramp from Gilman Springs Rd	Caltrans	D	B	F	F	Yes	Add one mixed flow lane.	Yes	A	C	No	See F-36	Pay fair share (8.3%)			
R-14 SR-60 WB On-Ramp from Theodore St	Caltrans	D	E	D	E	Yes	Add one mixed flow lane.	Yes	C	C	No	See F-34	Pay fair share (19.1%)			
R-15 SR-60 WB Off-Ramp to Redlands Blvd	Caltrans	D	D	E	D	Yes	Add one mixed flow lane.	Yes	C	B	No	See F-34	Pay fair share (14.0%)			
R-16 WB SR-60 Loop On-Ramp from Redlands Blvd	Caltrans	D	E	D	E	Yes	Add one mixed flow lane.	Yes	C	C	No	Pay fair share (14.0%)	Pay fair share (14.0%)			
R-17 SR-60 WB Direct On-Ramp from Redlands Blvd	Caltrans	D	D	F	D	Yes	Add one mixed flow lane.***	Yes	C	C	No	Pay fair share (14.0%)	Pay fair share (14.0%)			
R-18 SR-60 WB Off-Ramp to Central Ave	Caltrans	D	D	D	E	Yes	Add one mixed flow lane.	Yes	C	D	No	See W-25 (Table 74)	Pay fair share (14.0%)			
R-19 SR-60 WB Off-Ramp to Martin Luther King Blvd	Caltrans	D	D	D	E	Yes	Add one mixed flow lane.	Yes	C	D	No	See F-24	Pay fair share (14.0%)			

* Indicates LOS exceeds the target level

** Although the target LOS is not met, conditions with the project and the mitigation measure would be better than No-Project conditions

*** The mitigation measures are in addition to the mitigation measure needed for direct Project impacts (see Table 76)

**** The additional lane needed between Redlands Blvd. and Moreno Beach Dr. as mitigation for R-16 is the same lane that is needed to mitigate impacts to R-17. Only one lane is needed; not one for R-16 and a second for R-17.

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, September 2014.

- **Eastbound SR-60 from Reservoir Street to Ramona Avenue (F-2)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

The state freeway system is owned and operated by Caltrans and is thus outside the jurisdiction of the City of Moreno Valley. The City will work with Caltrans to establish a mechanism for collecting funds from developers for use in funding needed freeway improvements. However, since at the present time no such mechanism exists that would ensure that WLC funds contributed to Caltrans or any other state agency would be used to implement specific improvements that mitigate WLC impacts, and there is no mechanism by which the City can construct or guarantee the construction of any improvements to the freeway system by itself, this and all other freeway impacts must be considered as significant and unavoidable.

- **Westbound SR-60 from Reservoir Street to Ramona Avenue (F-2)** already exceeds the target LOS threshold and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold, resulting in a less than significant impact.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Ramona Avenue to Central Avenue (F-3)** already exceeds the LOS threshold and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Central Avenue to Mountain Avenue (F-4)** already exceeds the LOS threshold and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Mountain Avenue to Euclid Avenue (F-5)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Mountain Avenue to Euclid Avenue (F-5)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level.

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The existing freeway right-of-way in this section cannot accommodate additional lanes and the right-of-way cannot be expanded without severe impacts to the adjacent residential community. Since widening the freeway is infeasible, this impact is significant and unavoidable.

- **Westbound SR-60 from Euclid Avenue to Grove Avenue (F-6)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level.

The existing freeway right-of-way in this section cannot accommodate additional lanes and the right-of-way cannot be expanded without severe impacts to the adjacent residential community. Since widening the freeway is infeasible, this impact is significant and unavoidable.

- **Eastbound SR-60 from Grove Avenue to Vineyard Avenue (F-7)** already exceeds the LOS threshold and traffic density would increase and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Grove Avenue to Vineyard Avenue (F-7)** will exceed the target LOS threshold at some point in the 2022–2035 period this intersection. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Vineyard Avenue to Archibald Avenue (F-8)** already exceeds the LOS threshold and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less-than-significant level.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Archibald Avenue to Haven Avenue (F-9)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Valley Way to Rubidoux Boulevard (F-17)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The addition of a lane is identified in the Transportation Concept Report.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Valley Way to Rubidoux Boulevard (F-17)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The addition of a lane is identified in the Transportation Concept Report.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means to either widen the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Rubidoux Boulevard to Market Street (F-18)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The addition of a lane is identified in the Transportation Concept Report.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Market Street to Main Street (F-19)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. The addition of a lane is identified in the Transportation Concept Report.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Market Street to Main Street (F-19)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Main Street to SR-91 (F-20)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

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- **Westbound SR-60 from Martin Luther King Boulevard to Central Avenue (F-24)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Fair Isle Drive/Box Springs Road to I-215 (F-26)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Pigeon Pass Road/Frederick Street to Heacock Street (F-29)** currently operates at an acceptable LOS but will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. The addition of a lane is identified in the Transportation Concept Report.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Heacock Street to Perris Boulevard (F-30)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Heacock Street to Perris Boulevard (F-30)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Redlands Boulevard to Theodore Street (F-34)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing

that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Gilman Springs Road to Jack Rabbit Trail (F-36)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

Caltrans already has plans to build a truck climbing lane in this area. However, as explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Jack Rabbit Trail to Potrero Road (F-37)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less-than-significant level.

Caltrans already has plans to build a truck climbing lane in this area. However, as explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-91 from Pierce Street to Magnolia Avenue (F-41)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-91 from La Sierra Avenue to Tyler Street (F-43)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-91 from La Sierra Avenue to Tyler Street (F-43)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-91 from Tyler Street to Van Buren Boulevard (F-44)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting

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in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-91 from Van Buren Boulevard to Adam Street (F-45)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-91 from Adam Street to Madison Street (F-46)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The existing freeway right-of-way in this section cannot accommodate an additional lane and cannot be widened without impacting the adjacent residential community. Since widening the freeway is infeasible, this impact is significant and unavoidable.

- **Westbound SR-91 from Madison Street to Indiana Avenue (F-47)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-91 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound I-10 from SR-60 to Beaumont Avenue (F-52)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound I-10 from SR-60 to Beaumont Avenue (F-52)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound I-10 from Pennsylvania Avenue to Highland Springs Avenue (F-54)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would

increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound I-10 from Pennsylvania Avenue to Highland Springs Avenue (F-54)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound I-10 from Highland Springs Avenue to Sunset Avenue (F-55)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound I-10 from Highland Springs Avenue to Sunset Avenue (F-55)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound I-10 from 8th Street to S. Hargrave Street (F-58)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound I-10 from 8th Street to S. Hargrave Street (F-58)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

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- **Eastbound I-10 from S. Hargrave Street to Field Road (F-59)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound I-10 from Main Street (Cabazon) to Main Street (F-61)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-10 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Southbound I-215 from SR-74 to Ellis Avenue (F-71¹)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because I-215 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Southbound I-215 from Center Street to Iowa Avenue/La Cadena Drive (F-75)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The existing freeway right-of-way in this section cannot accommodate an additional lane and cannot be widened without impacting the adjacent frontage road. Since widening the freeway is infeasible, this impact is significant and unavoidable.

- **Southbound I-215 from Baseline Road to Highland Avenue (F-83)** will exceed the target LOS threshold at some point in the 2022-to-2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than-significant level. The freeway right-of-way in this section cannot accommodate an additional lane (beyond the lane already identified in the current SCAG RTP) and cannot be widened without impacting the adjacent railroad. Since widening the freeway is infeasible, this impact is significant and unavoidable.

Cumulative Freeway Weaving Mitigations

- **Eastbound SR-60 from SR-71/Garey Avenue to Reservoir Street (W-1)** already exceeds the target LOS threshold and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level.

¹ I-215 currently runs unbroken between SR-74 and Redlands Avenue. The RTP includes a project (3M0731) that would split this freeway mainline section by adding a new interchange at Ellis Avenue. For this reason, this freeway section is listed as "I-215 SR-74 to Redlands" on tables describing conditions prior to construction of the Ellis Avenue interchange.

SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley. The City will require the developer to pay a fair-share contribution towards improvement of this section as a condition of approval. However, because the freeway is outside the jurisdiction of the City of Moreno Valley and because no mechanism is in place for ensuring the availability of the non-project portion of the needed funds, the City cannot ensure that the identified improvements would be made. The project's impact on this section must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Haven Avenue to Archibald Avenue (W-9)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Eastbound SR-60 from Main Street to SR-91 (W-20)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from SR-91 to W. Blaine Street/3rd Street (W-21)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The existing freeway right-of-way in this section cannot accommodate an additional lane and cannot be widened without impacting the adjacent residential community. Since widening the freeway is infeasible, this impact is significant and unavoidable.

- **Westbound SR-60 from W Blaine Street/3rd Street to University Avenue (W-22)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The existing freeway right-of-way in this section cannot accommodate an additional lane and cannot be widened without impacting the adjacent residential community. Since widening the freeway is infeasible, this impact is significant and unavoidable.

- **Westbound SR-60 from University Avenue to Martin Luther King Boulevard (W-23)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a second on-ramp lane would reduce the cumulative impact to a less than significant level.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Central Avenue to Faire Isle Drive/Box Springs Road (W-25)** already exceeds the LOS threshold and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level.

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As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Day Street to Pigeon Pass Road/Frederick Street (W-28)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

Cumulative Freeway Ramp Mitigations

- **Eastbound SR-60 from On-Ramp from Martin Luther King Boulevard (R-1)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would reduce the cumulative impact to a less than significant level. The Transportation Concept Report does not call for further widening of this section, which could only be accomplished by eliminating the existing shoulder and thus leaving no space for disabled vehicles to pull over. Since this would create safety problems that would be less acceptable than a low LOS, mitigating this impact is infeasible. This impact is therefore significant and unavoidable.
- **Eastbound SR-60 from On-Ramp from Gilman Springs Road (R-10)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. (This improvement is already identified as the mitigation for freeway mainline segment F-36.)

Caltrans has plans to re-configure the SR-60/Gilman Springs Road interchange in the future. However, as explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from On-Ramp from Theodore Street (R-14)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. (This improvement is already identified as the mitigation for freeway mainline segment F-34.)

The City has a study underway to develop alternative designs for this interchange. The City will collect a fair-share contribution from the developer to implement this improvement in conjunction with the reconfiguration of the SR-60/Theodore Street Interchange. It should be noted the National Bridge Inventory 2012 Inspection Database¹ indicates that the Theodore Street bridge over SR-60 was designed for MS18 design loads and has a sufficiency rating for 97.9.

- **Westbound SR-60 from Off-Ramp to Redlands Boulevard (R-15)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring

¹ <http://nationalbridges.com/> Federal Highway Administration, searchable database last updated 2012

the LOS to within the target threshold, resulting in a less than significant impact. (This improvement is already identified as the mitigation for freeway mainline segment F-34.)

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Direct On-Ramp from Redlands Boulevard (R-17)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold.

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Off-Ramp to Central Avenue (R-18)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. (This improvement is already identified as the mitigation for freeway weaving segment W-25 in the direct impacts and mitigation list, Table 4.15.AX.)

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

- **Westbound SR-60 from Off-Ramp to Martin Luther King Boulevard (R-19)** will exceed the target LOS threshold at some point in the 2022–2035 period and traffic density would increase resulting in a cumulative impact in the Year 2035 Plus Project scenario. Adding a mixed-flow lane would bring the LOS to within the target threshold. (This improvement is already identified as the mitigation for freeway mainline segment F-24.)

As explained above, because SR-60 is a state facility outside the jurisdiction of the City of Moreno Valley, the City has no means for either widening the freeway itself or for guaranteeing that some other agency will widen the freeway. This impact must therefore be considered significant and unavoidable.

4.15.7.4 Mitigation Measures

- **4.15.7.4A** A traffic impact analysis (“TIA”) conforming to the guidelines for traffic impact analysis adopted by the City shall be submitted in conjunction with each Plot Plan application within the World Logistics Center Specific Plan. Prior to the approval of the Plot Plan, the City shall review the traffic impact analysis to determine if any of the traffic improvements listed in Final EIR Volume 2 Tables 4.15.AV through 4.15.BA (TIA Tables 74 through 79) of the traffic impact analysis prepared for the Program Environmental Impact Report are required to be completed prior to the issuance of a certificate of occupancy for each building. If the City determines that any of the improvements within Moreno Valley are required to be constructed in order to ensure that the traffic impacts which will result from the construction and operation of the building will be mitigated into insignificance, then the completion of construction of the improvements prior to the issuance of a Certificate of Occupancy for the building shall be made a Condition of Approval of the Plot Plan. Construction of improvements within the City shall be subject to credit/reimbursement agreement for those DIF and/or TUMF eligible costs. If the City determines that any of

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the improvements outside Moreno Valley are required to be constructed in order to ensure that the traffic impacts which will result from the construction and operation of the building will be mitigated to a less than significant level, then the payment of any necessary fair share contribution as prescribed in Mitigation Measure 4.15.7.4G prior to the issuance of a Certificate of Occupancy for the building shall be made a Condition of Approval of the Plot Plan. If the City determines that the traffic impacts which will result from the construction or operation of a building will be significantly more adverse than those shown in the Program Environmental Impact Report, further environmental review shall be conducted prior to the approval of the Plot Plan pursuant to Public Resources Code § 21166 and CEQA Guidelines § 15162 to determine what additional mitigation measures, if any, will be required in order to maintain the appropriate levels of service.

- 4.15.7.4B** As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require the dedication of appropriate right-of-way consistent with the Subdivision Map Act for frontage street improvements contained within the World Logistics Center Specific Plan Circulation Map, as shown in this Program EIR Figure 3-10 (or Figure 22 in the TIA prepared for this Program EIR). Required dedications shall be made prior to the issuance of occupancy permits for the requested development.
- 4.15.7.4C** As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require each project to pay the Development Impact Fee (DIF) as set forth in Municipal Code Chapter 3.42. Required DIF payments shall be made prior to the issuance of occupancy permits for the requested development.
- 4.15.7.4D** As a condition of approval for individual development permits processed in the future under the World Logistics Center Specific Plan, the City shall require each project to pay the requisite Transportation Uniform Mitigation Fee (TUMF) as set forth in Municipal Code Sections 3.55.050 and 3.55.060. Required TUMF payments shall be made prior to the issuance of occupancy permits for the requested development.
- 4.15.7.4E** In order to ensure that all of the Project's traffic impacts are mitigated to the greatest extent feasible, the Applicant shall contribute its fair share of the cost of the needed traffic improvements that are not within the City as identified in the World Logistic Center Specific Plan Traffic Impact Analysis (i.e., under the jurisdiction of other cities, the County of Riverside or Caltrans, pursuant to Mitigation Measure 4.15.7.4F). As used in this mitigation measure, the Applicant's "fair share" has been determined in compliance with the requirements of the Fee Mitigation Act, Government Code § 66000 et seq., and, pursuant to § 66001(g), does not require that the Applicant be responsible for making up for any existing deficiencies.

For example, the intersection of Martin Luther King Blvd. and the I-215 northbound ramps (Intersection 85) in the City of Riverside was identified as a place where the World Logistic Center contributes to cumulatively significant impacts, and where the fair share contribution of the World Logistic Center project as a whole was computed to be 6.2%. If the City of Riverside establishes a fair share contribution program consistent with this Mitigation Measure 4.15.7.4F to improve that intersection, then when a certificate of occupancy is to be issued for a 2-million square feet high-cube warehouse in the World Logistic Center (approximately 5% of the entire World Logistic Center project) the amount of the fair share payment due from the Applicant to the City of Riverside would be computed as follows:

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Amount Due	=	Total cost of Improvement	×	Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis	×	% attributable to the building that is subject to the certificate of occupancy (5%)
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$A \times B \times C = D$
<p>A= % attributable to the building that is subject to the certificate of occupancy (5%) B= Total World Logistics Center fair share (6.2%) as determined by Traffic Impact Analysis C= Total cost of Improvement D= Amount Due</p>

A similar calculation would be done for each subsequent building, with payments for each due at the time of issuance of the certificate of occupancy. As a result, while each building individually would not produce a significant impact, and therefore would not be required to pay any mitigation fees if considered by itself, the total amount of the payments for all of the buildings would be equal to the fair share payment for the entire World Logistic Center to the extent that the responsible jurisdiction has chosen to adopt a fair share contribution funding program consistent with Mitigation Measure 4.15.7.4F.

4.15.7.4F The Applicant shall pay a portion of the fair share of the cost of traffic improvements identified in the Transportation Impact Analysis for those significantly impacted road segments and intersections for each warehouse building within the World Logistics Center if the impacted jurisdiction has established a fair share contribution program prior to the approval of a building-specific plot plan. The City shall determine whether a fair share program exists in the impacted jurisdiction and, if one does exist, require that the appropriate fees are paid by the Applicant, consistent with the requirements below, prior to the issuance of a certificate of occupancy for the building in question. If no fair share program exists or if the existing programs are not consistent with the requirements below, then no payment of fees shall be required. The impacts are to be determined on a road segment or intersection basis. Nothing in this condition requires the payment of a traffic impact fee imposed by another jurisdiction which covers improvement to facilities where the project does not have a significant impact. Fair-share contributions will be determined on a building-by-building basis as a share of the impact of the Project as a whole (for each segment or intersection where the World Logistics Center project as a whole has a significant impact identified in the Programmatic Environmental Impact Report) as determined by the Traffic Impact Analysis and will be due as each certificate of occupancy is issued. The fair share payments for the significantly impacted road segments and intersections identified in the Programmatic Environmental Impact Report will be required even though the impact resulting from a specific building does not, by itself, cause a significant impact.

4.15.7.4G City shall work directly with Western Riverside Council of Governments to request that Transportation Uniform Mitigation Fee funding priorities be shifted to align with the needs of the City, including improvements identified in the World Logistics Center Specific Plan traffic impact analysis. Toward this end, City shall meet regularly with Western Riverside Council of Governments.

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Congestion Management

In addition to and in concert with the mitigation measures defined above for or traffic impacts, the World Logistics Center would incorporate a number of measures that reduce single occupancy vehicle trips as part of design features and required mitigation measures to reduce air quality impacts. These design features and measures, described in more detail in Section 4.3 Air Quality, would create alternatives to single occupancy vehicle trips for those individuals that would be employed at the World Logistics Center. These measures include:

- Participation in Riverside County's Rideshare Program
- Class II bike lanes for all project streets
- Pedestrian pathways throughout the project site
- Pedestrian connections to nearby residential areas
- Provision of bicycle storage space
- Preferential carpool/vanpool parking

In addition, the World Logistics Center Specific Plan requires that mass transit features, such as bus stops, be incorporated into the project, based on consultation with the Riverside Transit Agency.

4.15.7.5 Level of Significance after Mitigation

Even with implementation of **Mitigation Measures 4.15.7.4.A through 4.15.7.4.G**, and implementation of all the improvements identified in Tables 4.15.AV through 4.15.BA, direct and cumulative impacts on study area roadway segments, intersections, and freeway facilities would not be reduced to less than significant levels, including all improvement locations not under the control of the lead agency (i.e., outside of the City of Moreno Valley). This is because the primary determinant of the level of significance after mitigation is the agency responsible for the transportation facility in question. The City has no means for controlling when transportation improvements are made outside of its jurisdiction, and therefore, cannot guarantee when such improvements would be made. These roadways, intersections, and freeway facilities are grouped into four categories based on the jurisdiction the transportation facility is located and are summaries as follows.

On-Site Improvements. These are improvements and changes to the road system within the WLC project site that are being undertaken as part of the WLC project. The developer shall be responsible for constructing the improvements described in the TIA (Chapter 4, "Proposed Road Network") in accordance with City standards for roadway construction and the roadway cross-sections in the proposed Specific Plan. Completion of these improvements shall constitute the developer's mitigation of the project's on-site impacts. When these improvements are completed, the project's impacts on the roadway system within the WLC project site will be mitigated to a less-than-significant level.

Off-Site Improvements for Non-TUMF Roads Under the Jurisdiction of the City of Moreno Valley. These are improvements and changes to public streets in Moreno Valley that are outside the area covered by the proposed WLC Specific Plan Amendment. The developer shall be responsible for paying the DIF as set forth in Municipal Code Chapter 3.42 which the City shall use to implement the mitigation measures identified in Tables 4.15.AV, 4.15.AW, 4.15.AY, and 4.15.AZ (TIA Tables 74, 75, 77, and 78) pertaining to DIF facilities. The developer shall also be required to pay its fair share of the improvements to City streets that are not in the DIF program where there are significant project impacts. These payments shall constitute the developer's mitigation of project impacts on this

category of roads. When these improvements are completed, the project's impacts on the City roadway and intersection system will be mitigated to a less-than-significant level.

Off-Site Improvements to TUMF Facilities. These are improvements and changes to roads and intersections that are part of the TUMF Regional System of Highways and Arterials, some of which are under the jurisdiction of Moreno Valley and others are located in other jurisdictions. The developer shall be responsible for paying the TUMF fees in effect at the time of approval. These payments shall constitute the developer's mitigation of project impacts to this category of roads and intersections.

The City shall implement the mitigation measures identified in Tables 4.15.AV, 4.15.AW, 4.15.AY, and 4.15.AZ pertaining to TUMF facilities under the City's jurisdiction. When these improvements are completed, the project's impacts on the roadway and intersection system within the WLC project site will be mitigated to a less than-significant level.

The City shall work with the other member agencies of WRCOG to program TUMF funds to implement the mitigation measures identified in 4.15.AV, 4.15.AW, 4.15.AY, and 4.15.AZ pertaining to TUMF facilities outside the jurisdiction of the City of Moreno Valley. To the extent that TUMF fees provided by the developer are used to implement the recommended improvements the project's impacts would be less-than-significant. However, because the City does not have direct control over TUMF funding the City cannot ensure that the identified improvements would be made. The project's impacts on these facilities must be considered significant and unavoidable.

Off-Site Improvements to Roads Outside the Jurisdiction of the City and Not Part of the TUMF Program. This category includes all of the recommended mitigation measures that are under the jurisdiction of Riverside County, Caltrans, and other municipalities and that are not included in the TUMF Regional System of Highways and Arterials.

At this time, the City does not have cooperative agreements with neighboring jurisdictions that would serve as a mechanism for collecting and distributing developer funds to cover the cost of cross-jurisdictions mitigation measures, other than the TUMF program. The City shall therefore work with the City of Redlands and Riverside County to collect funds from the developer and to implement the signalization of the San Timoteo Road/Alessandro Road intersection and the San Timoteo Road/Live Oak Canyon intersection (respectively). The City shall also work with the City of Riverside to collect a fair-share contribution from the developer to signalize the Martin Luther King Boulevard/I-215 northbound ramp intersection. To the extent that the City is able to establish such a mechanism (as described in Mitigation Measure 4.15.7.4F) and the other jurisdiction constructs the recommended improvement, the project's impacts would be less-than-significant. However, because the City cannot guarantee that such a mechanism will be established and does not have direct control over facilities outside of its jurisdiction the City cannot ensure that the identified improvements would be made. Thus, at this point the project's impacts on these facilities must be considered significant and unavoidable.

Similarly, the City has not entered into an agreement with Caltrans for the collection of developer payments for improvements to the state highway system other than freeway interchange improvements funded through the TUMF program. Nor has Caltrans established a program to collect fair-share contributions to freeway improvements such as those identified in Tables 4.15.AX and 4.15.BA. Instead, Caltrans has traditionally relied on other means to fund freeway improvements; means involving multiple stages of review and input from other agencies, with priorities and constraints applied at each stage, that preclude a direct connection between developer-provided fair-share funds and specific highway improvements.

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Decisions on funding for improvements to the state highway system are made by four bodies, namely:

- **Legislature:** Establishes overall policies, including determining funding sources and distribution, and spending priorities through state statutes such as Revenue and Taxation Code, Streets and Highways Code, and Government Code. The Legislature appropriates funds through the annual budget for transportation projects and has authority to designate transportation projects statutorily.
- **California Transportation Commission (CTC):** The nine-member CTC, appointed by the Governor, reviews and adopts the state transportation programs and approves projects nominated by Caltrans and regional agencies for funding. The CTC recommends policy and funding priorities to the Legislature and is also responsible for project delivery oversight.
- **California Department of Transportation (Caltrans):** Caltrans owns, operates and maintains the state highway system. Caltrans plans, designs, and nominates interregional capital improvement projects on the state highway system and also manages the intercity rail operation.
- **Metropolitan Planning Organizations (MPOs) and Regional Transportation Planning Agencies (RTPAs):** MPOs and RTPAs are responsible for planning, coordinating and administering funds for regional transportation systems. In California, 17 MPOs and 48 RTPAs develop 20-year Regional Transportation Plans (RTPs) as well as 5-year Regional Transportation Improvement Program (RTIP), which identify projects for the regional portion of the State Transportation Improvement Program (STIP). SCAG is the MPO for Riverside County.

Most funds for improvements to the state highway system come through the State Highway Account (SHA), which receives funding from a variety of sources including:

- Motor vehicle fuel taxes, part of which goes into the Highway Users Tax Account, a portion of which goes to the SHA and the rest goes to cities and counties according to a statutory formula.
- The fuel tax swap, enacted in 2011 (Fuel Tax Swap Fix), reenacted the provisions of the Fuel Tax Swap of 2010 addressing issues raised by the passage of Propositions 22 and 26. The Fuel Tax Swap eliminated the state sales tax on gasoline and instead imposed an additional excise tax on gasoline of 17.3¢ (July 2010). The increase in the excise tax would generate revenues equivalent to what would have been collected from the state sales tax on gasoline. These revenues are intended for new road construction (STIP), highway maintenance and operations (SHOPP), and local roadways.
- The federal fuel tax, which goes into the Highway Trust fund for use on the portions of the system that are designated as federal aid highways.

In addition, local sales tax measures, such as Measure A in Riverside County, and the proceeds of Proposition 1B provide funding for improvements to certain portions of the state highway system.

The key feature of this system pertaining to the recommended freeway mitigation measures is that this system is outside the control of the City of Moreno Valley. The City shall work with Caltrans to establish a mechanism for collecting funds from developers for use in funding needed freeway improvements. However, since at the present time no such mechanism exists that would ensure that WLC funds contributed to Caltrans or any other state agency would be used to implement specific improvements that mitigate WLC impacts, and there is no mechanism by which the City can construct or guarantee the construction of any improvements to the freeway system by itself, the project's impacts on the state highway system must be considered significant and unavoidable.

4.15.8 Summary of Project-Related Traffic Impacts

Based on the preceding analyses in Sections 4.15.5.1 through 4.15.6.4, the WLC project will have the following direct and cumulative air quality impacts:

Table 4.15.BB: Summary of Project-Related Traffic Impacts

Impact	Traffic and Circulation Topic/Issue	Impact Conclusion
4.15.5.1	Air Traffic Patterns	Less than Significant No Mitigation Required
4.15.5.2	Design Hazard Features	Less than Significant No Mitigation Required
4.15.5.3	Emergency Access	Less than Significant No Mitigation Required
4.15.5.4	Alternative Transportation Policies, Plans, or Programs	Less than Significant No Mitigation Required
4.15.6.1	Existing (2012) With Phase 1 Conditions Traffic and Level of Service	<p>Less than Significant with Mitigation (on-site roads and intersections)</p> <p>Less than Significant with Mitigation (roads and intersections included in DIF within City)</p> <p>Less than Significant with Mitigation (roads and intersections included in TUMF within City)</p> <p>Significant and Unavoidable with Mitigation (roads and intersections included in TUMF outside City)</p> <p>Significant and Unavoidable with Mitigation (roads and intersections not in TUMF outside City)</p> <p>Significant and Unavoidable with Mitigation (all freeway mainline, weaving, and ramp facilities)</p>
4.15.6.2	Existing (2012) With Project (Buildout) Conditions Traffic and Level of Service	<p>Less than Significant with Mitigation (on-site roads and intersections)</p> <p>Less than Significant with Mitigation (roads and intersections included in DIF within City)</p> <p>Less than Significant with Mitigation (roads and intersections included in TUMF within City)</p> <p>Significant and Unavoidable with Mitigation (roads and intersections included in TUMF outside City)</p> <p>Significant and Unavoidable with Mitigation (roads and intersections not in TUMF outside City)</p> <p>Significant and Unavoidable with Mitigation (all freeway mainline, weaving, and ramp facilities)</p>

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Table 4.15.BB: Summary of Project-Related Traffic Impacts

Impact	Traffic and Circulation Topic/Issue	Impact Conclusion
4.15.6.3	Year 2022 With Phase 1 Conditions Traffic and Level of Service Impacts	<p>Less than Significant with Mitigation (on-site roads and intersections)</p> <p>Less than Significant with Mitigation (roads and intersections included in DIF within City)</p> <p>Less than Significant with Mitigation (roads and intersections included in TUMF within City)</p> <p>Significant and Unavoidable with Mitigation (roads and intersections included in TUMF outside City)</p> <p>Significant and Unavoidable with Mitigation (roads and intersections not in TUMF outside City)</p> <p>Significant and Unavoidable with Mitigation (all freeway mainline, weaving, and ramp facilities)</p>
4.15.6.4	Year 2035 Cumulative With Project Conditions Traffic and Level of Service Impacts	<p>Less than Significant with Mitigation (on-site roads and intersections)</p> <p>Less than Significant with Mitigation (roads and intersections included in DIF within City)</p> <p>Less than Significant with Mitigation (roads and intersections included in TUMF within City)</p> <p>Significant and Unavoidable with Mitigation (roads and intersections included in TUMF outside City)</p> <p>Significant and Unavoidable with Mitigation (roads and intersections not in TUMF outside City)</p> <p>Significant and Unavoidable with Mitigation (all freeway mainline, weaving, and ramp facilities)</p>

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NOTE TO READERS. *Revisions have been made to this section to address changes in the Specific Plan, revisions to the project hydrology study, and in response to comments regarding drainage and mitigation.*

4.16 UTILITIES AND SERVICE SYSTEMS

This section analyzes the existing and planned water supply, wastewater facilities, drainage or storm water facilities (as they relate to water), solid waste facilities, and natural gas and electrical facilities for the project site and the surrounding area, and evaluates the impacts to utility providers that could result from the construction and operation of the proposed on-site uses.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

For the reader's reference, this EIR and each of the technical reports and analyses contained herein have been written to address a series of planning entitlements that affect several separate, adjacent and related properties. The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

This section is based on information obtained from utility providers serving the proposed WLC project site, most of which are included in Appendix J of this EIR:

- *City of Moreno Valley General Plan*;¹
- *Eastern Municipal Water District's 2010 Urban Water Management Plan*;²
- *Water Supply Assessment (WSA)* approved by the Eastern Municipal Water District Board of Directors on March 21, 2012);

¹ *City of Moreno Valley General Plan*, City of Moreno Valley, adopted by City Council Resolution No. 2006-83, July 11, 2006.

² *EMWD 2010 Urban Water Management Plan*, Eastern Municipal Water District, June 2011.

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- *Technical Memorandum – Dry Utilities World Logistics Center, Moreno Valley, CA*, Utilities Specialists, October 24, 2013; and
- *Sanitary Sewer Analysis Memorandum*, CH2MHill, October 18, 2013.

This section differs slightly from other sections in that it is organized by utility/service system type so continuity is maintained. Water Supply is found in Section 4.16.1, Wastewater Services are discussed in Section 4.16.2, Solid Waste Services are found in Section 4.16.3, and Energy Consumption is addressed in Section 4.16.4.

4.16.1 Water Supply

4.16.1.1 Existing Setting

The project site is located within the service area of the Eastern Municipal Water District (EMWD),¹ which owns, operates, and maintains the water system within the limits of the City and will be the purveyor of water to the proposed WLC project site. As illustrated in Figure 4.16.1, the EMWD's service area encompasses approximately 555 square miles. The water supply available to the EMWD in 2010 totals approximately 154,700 acre-feet (AF).² Water sources for the EMWD include imported water purchased from the Metropolitan Water District of Southern California (Metropolitan), groundwater sources, desalted groundwater, and recycled water from the EMWD's five regional water reclamation facilities. Imported water from Metropolitan is delivered to EMWD in several ways: directly as potable water; as raw water and treated at two local EMWD filtration plants; or as raw water for non-potable use. Approximately 80 percent of the EMWD's water is imported from Metropolitan and the remaining 20 percent is supplied by groundwater wells. Approximately 33 percent of the water produced by EMWD is recycled water. Groundwater supplies are drawn from the EMWD wells located in the Hemet, San Jacinto, Moreno Valley, Perris Valley, and Murrieta areas.

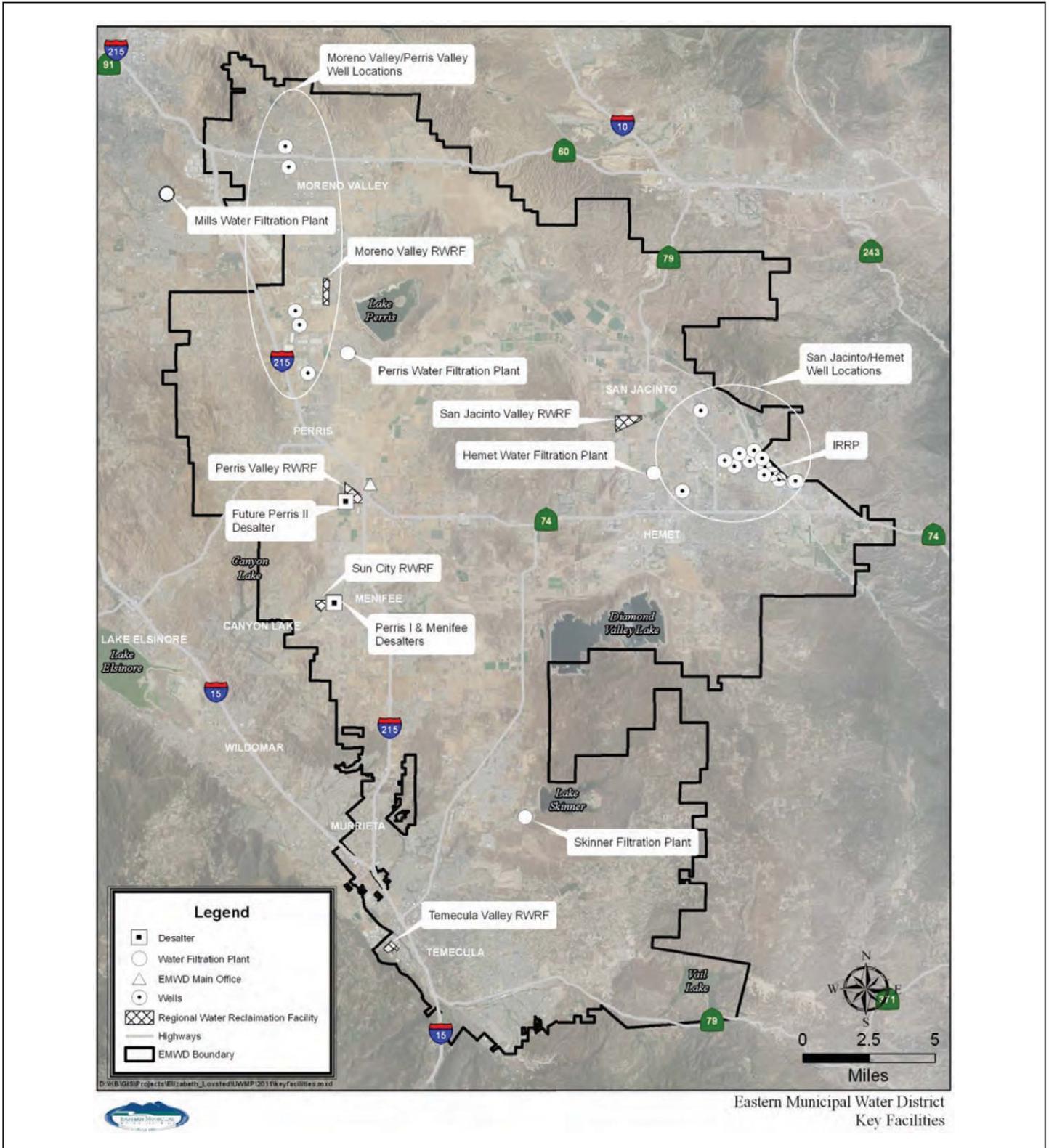
The following information was added at the request of the Metropolitan Water District of Southern California (Letter C-2) regarding their Inland Feeder facility. The figure showing the location of the Inland Feeder can be found at the end of comment Letter C-2 from the Metropolitan Water District of Southern California.

“Metropolitan owns property and owns and operates facilities on and adjacent to the site of the proposed project. As shown on the attached map, Metropolitan's irregularly shaped fee-owned property (APN 422-040-009 and 422-040-015), Inland Feeder Tunnel, and appurtenant tunnel access structure are located within the proposed specific plan area. In addition, Metropolitan's 145-inch-inside-diameter Inland Feeder pipeline and appurtenant structures extend through the specific plan area in the street rights-of-way for Eucalyptus Avenue, Theodore Street, and Davis Road. Metropolitan also has a 110-foot-wide easement along Davis Road.”

In June of 2011, the EMWD adopted its *2010 Urban Water Management Plan (UWMP)*, which details the EMWD's current and future water supply. The document found that with all of its existing and planned supplies, the EMWD can meet 100 percent of projected supplemental demand through 2035, even with a repeat of a severe drought. In addition, the UWMP addresses conservation, local supplies and reliability of imported supplies. Table 4.16.A identifies the EMWD's projected water supplies and demand.

¹ *Eastern Municipal Water District Service Area*, Eastern Municipal Water District, <http://www.emwd.org/.aspx?page=59>, website accessed April 2, 2012.

² An acre-foot covers one acre to a depth of one foot. An acre-foot is approximately 326,000 gallons which is enough to meet the needs of two average southern California households a year.



LSA

FIGURE 4.16.1

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Location of Eastern Municipal
Water District Supplies

SOURCE: Eastern Municipal Water District 2010 Urban Water Management Plan, 2011

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Table 4.16.A: EMWD Water Supplies and Demand for Average Year Hydrology

		2015	2020	2025	2030	2035
EMWD Water Supplies						
Supply Type	Supply Source	acre-feet per year				
Imported	Metropolitan Water District	149,300	170,700	190,700	210,000	226,200
Imported-Locally Treated	Metropolitan Water District					
Groundwater	West San Jacinto Management Area	13,200	13,200	13,200	13,200	13,200
Desalination	West San Jacinto Management Area	7,500	7,500	7,500	7,500	7,500
Recycled	EMWD Regional Water Reclamation Facilities	43,900	50,000	53,900	54,900	55,300
Supply Total		213,900	241,400	265,300	285,600	302,200
EMWD Water Demands						
Demand Source	acre-feet per year					
Retail Potable Water Sales	113,800 120,700 136,100 150,300 162,200					
Water Sales to Other Agencies	47,600 61,600 65,000 69,000 72,400					
Other Water Uses/Losses	52,500 59,100 64,200 66,300 67,600					
Demand Total		213,900	241,400	265,300	285,600	302,200

Source: EMWD 2010 Urban Water Management Plan, Eastern Municipal Water District, June 2011 (Tables 3 and 9, WSA 2012).

The proposed WLC project site is located within EMWD Pressure Zones (PZ) 1764 and 1900. Water is supplied to the project area via a pump station (1900 PZ pump station) located north of the intersection of Redlands Boulevard and Cottonwood Avenue. This pump station also delivers water to areas north of State Route 60 (SR-60). A 20-inch transmission main underlying Redlands Boulevard (Redlands Transmission Pipeline) delivers the pumped water from the 1900 PZ pump station to the 2080 PZ pump station located at Redlands Boulevard and Ironwood Avenue. The nearest recycled water line is a 24-inch transmission main located approximately 0.25 mile southwest of the project site, at the intersection of Redlands Boulevard and Cactus Avenue. Although there are no active recycled water lines adjacent to the project site, in the future, it may be possible to serve this project site with recycled water.

Water imported by the EMWD is treated at two facilities owned and operated by Metropolitan, the Mills and Skinner Filtration Plants, which serve the northwest and southern areas of the EMWD service area. Treated water is supplied north of the EMWD service area by the Mills Metropolitan Water Treatment Facility and in the southeastern portion of the EMWD service area by the Lake Skinner Water Treatment Facility. The City is located within the area served by the Mills Filtration Plant, which has a treatment capacity of 326 million gallons per day (mgd). The EMWD also utilizes untreated water delivered by Metropolitan from the State Water Project (SWP) pipeline running through the EMWD's jurisdiction. The EMWD currently treats the raw water for potable use or uses it raw for agriculture and for recharge. Treatment of raw water occurs at water filtration plants in Perris and in Hemet. The Hemet microfiltration plant has a capacity to filter 8,800 acre-feet per year (AFY) and the Perris microfiltration plant has the capacity to filter 17,600 AFY.

The EMWD constructed the Menifee Desalter and Perris Desalter facilities to recover high total dissolved solids (TDS) groundwater for potable use. In addition to being a source of water, the desalter facilities play a part in managing the groundwater subbasins by addressing the migration of brackish groundwater into areas of good quality groundwater. Additionally, the EMWD is currently in

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the process of constructing a third desalter facility, the Perris II Desalter.¹ This additional facility will increase the production of desalinated water to approximately 12,000 AFY.

Based on the Water Allocation analysis released by the California Department of Water Resources (DWR) on March 22, 2010, export restriction could reduce Metropolitan deliveries by 150 to 200 thousand acre-feet (TAF) under mean hydrologic conditions, and operations could remain restricted until a long-term solution is found to improve the stability of the Bay-Delta region.

The SWP and Central Valley Project (CVP) are the responsible partners for operation of the DWR and Bureau of Reclamation (Reclamation), respectively. In November 1986, DWR and Reclamation signed the Coordinated Operations Agreement (COA). The COA was subsequently authorized and approved by the California State Legislature and Congress. Under COA, DWR and Reclamation agree to operate the SWP and CVP in a balanced manner to coordinate releases from upstream reservoirs and unregulated flows to meet Sacramento Valley in-basin and in-Delta uses, including water quality standards established by the State Water Resources Control Board (SWRCB).

Reclamation, as a Federal agency is required to consult with National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Federal Endangered Species Act (FESA) to determine if a Federal action that it authorizes, funds, or implements could jeopardize the continued existence of a listed species in the wild, or destroy or modify the species' critical habitat. Because the SWP and CVP are operated in a balanced manner, the findings under Section 7 of the FESA affect operations of both the SWP and CVP.

The initial biological opinions related to long-term operations of the SWP and CVP were issued in 1993 by NMFS for protection of the winter-run Chinook salmon and by USFWS for protection of delta smelt. Operations of the SWP and CVP were modified to reduce potential adverse impacts to these species primarily through:

- Increased storage volumes of water in upstream reservoirs to provide adequate flows with appropriate temperatures for the winter-run Chinook salmon and adequate flows in the Delta for both species;
- Flows released from upstream reservoirs to provide adequate in-Delta flows and Delta outflows for these species; and
- Modification of periods of time when water can be diverted at the SWP and CVP south Delta intakes to reduce the potential for reverse flows, reduce the potential for high salinity in the south Delta, and reduce the potential for entrainment and entrapment of fish in the SWP and CVP south Delta intake facilities.

The biological opinions were modified as DWR and Reclamation modified operations of the SWP and CVP and new information related to aquatic resources became available. During this period, NMFS redesignated the Sacramento River winter-run Chinook salmon as “endangered” and designated two species as “threatened” (i.e., Central Valley spring-run Chinook salmon and Central Valley steelhead). Therefore, the consultations under Section 7 of the FESA were modified and new biological opinions were issued between 2000 and 2004. In 2005, the Department of the Interior was sued with respect to 2004 biological opinion issued by USFWS. Subsequently, USFWS re-issued the biological opinion in 2005; however, the Department of the Interior was sued in 2005 with respect to the re-issued biological opinion. The 2005 USFWS biological opinion was invalidated and United States District Court for the Eastern District of California (the Court) ordered a new biological opinion and issued interim operations orders to protect delta smelt until a new biological opinion could be

¹ *Water Supply Desalination Infrastructure South Perris Project, Perris II Desalter*, <http://www.emwd.org/modules/.aspx?documentid=90>, website accessed April 2, 2012.

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issued in 2008. The interim operations criteria included limitations for operation of the SWP and CVP south Delta intakes to protect delta smelt.

In response to these actions, Reclamation requested consultation with USFWS and NMFS in August 2008 with respect to the coordinated long-term operation of the SWP and CVP. In December 2008, the USFWS issued a new biological opinion on the coordinated long-term operation of the SWP and CVP on the effects to delta smelt. In June 2009, the NMFS issued a new biological opinion on the coordinated long-term operation of the SWP and CVP on the effects to currently listed species (e.g., Central Valley spring-run Chinook salmon, Central Valley steelhead, Southern District Population Segment of North American green sturgeon, and Southern Resident killer whale). Reclamation provisionally accepted and then implemented the Reasonable and Prudent Alternatives included in these biological opinions. The operational criteria included in the Reasonable and Prudent Alternatives resulted in changes to operations of upstream reservoirs, stream flows, Delta outflow, and SWP and CVP south Delta intakes.

Several lawsuits were filed in the Court related to various aspects of the USFWS and NMFS biological opinions, and to the acceptance and implementation of the associated Reasonable and Prudent Alternatives by Reclamation. Between 2009 and 2010, the Court ruled that Reclamation failed to conduct an environmental analysis under the National Environmental Policy Act (NEPA) of potential impacts to the human environment before provisionally accepting and implementing the Biological Opinion Reasonable and Prudent Alternatives. In 2010, the Court found certain portions of the USFWS biological opinion to be arbitrary and capricious, and remanded those portions of the biological opinion to USFWS. The Court ordered Reclamation to review the biological opinion and Reasonable and Prudent Alternative in accordance with NEPA. In 2011, the Court remanded the biological opinion to NMFS.

Reclamation has continued the consultation with USFWS and NMFS for modification of the biological opinions, and has initiated the NEPA process through publication of the Notice of Intent on March 28, 2012. The Court order required completion by Reclamation of the Environmental Impact Statement (EIS) and the USFWS biological opinion related to delta smelt by December 1, 2013. The Court order also required completion by Reclamation of the EIS and the NMFS biological opinion related to Central Valley spring-run Chinook salmon, Central Valley steelhead, Southern District Population Segment of North American green sturgeon, and Southern Resident killer whale by February 1, 2016. The Court did not vacate the biological opinions and, therefore, SWP and CVP operations are analyzed each year with respect to the Reasonable and Prudent Alternatives.

The most recent Metropolitan Regional Urban Water Management Plan (RUWMP) (Metropolitan November 2010, page 1-18) indicates that operational constraints similar to the most recent biological opinions and associated Reasonable and Prudent Alternatives would likely be continued until future long-term plans, such as the Bay Delta Conservation Plan (BDCP), would be implemented. A similar discussion was included in the EMWD Urban Water Management Plan (UWMP) (2010, page 38).

To address potential constraints on the SWP, Metropolitan is working with stakeholders throughout the State to develop and implement long-term solutions to the problem in the Bay Delta. The BDCP developed by State and Federal resource agencies, addresses ecosystem needs and securing long-term operating permits for the SWP. A working draft of the BDCP was released in November 2010 and reflects significant progress toward consensus on a plan to restoring the Bay-Delta ecosystem and associated sensitive species and provide for improved water supply and reliability.

The Metropolitan RUWMP also indicates that the SWP supplies with these considerations plus other water supplies (e.g., conservation, local and regional supplies, and Colorado River) would be adequate to meet Metropolitan water demands during dry years when water supplies generally are

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restricted (Metropolitan November 2010, page 1-34, Figure 1-9). A similar discussion was included in the EMWD UWMP (2010, page 30, Table 3.3).

In evaluating the supply reliability for the 2010 RUWMP, Metropolitan assumed a new Delta conveyance would be fully operational by 2022, bringing supply reliability close to 2005 levels prior to supply restrictions imposed due to the Biological Opinions. This assumption is consistent with Metropolitan's long-term Delta action plan approved in 2007, and supported by recently passed legislation that included a roadmap for establishing governance structures and financing approaches to implement and manage a Delta solution. In response to the recent developments in the Delta, Metropolitan is engaged in planning processes that will identify solutions that, when combined with the rest of its supply portfolio, it will ensure a reliable long-term water supply for its member agencies. In the near term, Metropolitan will continue to rely on the plans and policies outlined in its RUWMP and Integrated Resources Plan (IRP) to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands. An aggressive campaign for voluntary conservation and recycled water usage, curtailment of groundwater replenishment water and agricultural water delivery are some of the actions outlined in the RUWMP. Metropolitan is maximizing supplies from existing agreements for water supply from its Palo Verde Crop Management and Water Supply Program and working with the State of Arizona in withdrawing water previously stored in that state's groundwater basin.

Imported sources of water will be supplemented by an increase in desalination of brackish groundwater, recycled water use, and water use efficiency. Metropolitan has analyzed the reliability of water delivery through the SWP and the Colorado River Aqueduct. Metropolitan's IRP and 2010 RUWMP conclude that, with the storage and transfer programs developed by Metropolitan, there will be a reliable source of water to serve its member agencies' needs through 2035.¹

NOP/Scoping Comments. A few residents asked how much water the project would use and if there was enough if we had another drought.

4.16.1.2 Existing Policies and Regulations

Policies and regulations for water sources include the following:

- Federal Water Pollution Control Act;
- Water Conservation in Landscaping Act;
- Water Recycling in Landscaping Act;
- Sections 13550–13556 of the State Water Code;
- Urban Water Management Planning Act;
- Senate Bill 901;
- Senate Bill 610; and
- City of Moreno Valley General Plan.

Federal Water Pollution Control Act. The Federal Water Pollution Control Act requires discharges (from point and non-point sources) into navigable water to meet stringent National Pollutant Discharge Elimination System (NPDES) permit standards. The U.S. Environmental Protection Agency

¹ *Eastern Municipal Water District 2010 Urban Water Management Plan*, Eastern Municipal Water District, June 2011.

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(EPA) has published regulations establishing requirements for application of storm water permits for specified categories of industries, municipalities, and certain construction activities. The regulations require that discharges of storm water from construction activity of 1.0 acre or more must be regulated and covered by an NPDES permit. When a construction area exceeds 1.0 acre in size, the applicant must develop and implement a Storm Water Pollution Prevention Plan (SWPPP). Additional analysis and information regarding NPDES requirements and regulations is provided in Section 4.9, *Hydrology and Water Quality*, of this EIR.

Water Conservation in Landscaping Act. To ensure adequate supplies are available for future uses and to promote the conservation and efficient use of water, local agencies are required to adopt water-efficient landscape ordinances. When such an ordinance has not been adopted, a finding as to why (based on the climatic, geologic, or topographical conditions) such an ordinance is not necessary must be adopted. In the absence of such, an ordinance drafted by the State of California applies within the affected jurisdiction. The City of Moreno Valley implements landscape and irrigation design standards (Chapter 9.17 of the City's Municipal Code), which address the proper maintenance of landscaping or irrigation systems.¹

Water Recycling in Landscaping Act. The Water Recycling in Landscaping Act requires that a water producer capable of providing recycled water that meets certain conditions notify local agencies eligible to receive the recycled water. It also requires necessary infrastructure be provided to support the delivery of recycled water. The EMWD enforces Ordinance No. 68.2 *Amended Rules and Regulations Governing the Provision of Recycled Water System Facilities and Service*, to promote the conservation and reuse of water resources and to ensure maximum public benefit from the use of the EMWD's recycled water supply by regulating its use in accordance with applicable Federal, State, and local regulations. Upon the determination that the EMWD is capable of providing recycled water services to the proposed site, the project applicant must submit an application form for the EMWD to review. The EMWD may prescribe requirements in writing to the applicant as to the off-site or on-site facilities necessary to be constructed, the manner of connection, the financial responsibility, and the use of the recycled water. Prior to receiving recycled water service, the proposed use shall be approved by the DHS. The EMWD will inspect on-site recycled water facilities to ensure initial and future continued compliance with the EMWD's regulations and other applicable requirements.

Sections 13550–13556 of the State Water Code. These sections of the State Water Code state that local, regional, or state agencies shall not use water from any quality source of potable water for non-potable uses if suitable recycled water is available as provided in Section 13550 of the Water Code.

Urban Water Management Planning Act (Cal. Water Code Section 10631). Since 1984, the Urban Water Management Planning Act, has required "urban water suppliers" to develop written "urban water management plans." While generally aimed at encouraging water suppliers to implement water conservation measures, it also created long-term planning obligations.

In preparing urban water management plans, urban water suppliers must describe the following:

- Existing and planned water supply and demand;
- Water conservation measures and a schedule for implementing and evaluating such measures; and

¹ *Landscape Requirements City of Moreno Valley, California, City of Moreno Valley.*

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- Water shortage contingency measures.

The Urban Water Management Planning Act requires that urban water suppliers use a 20-year planning horizon and update the data in the urban water plans every five years.

In preparing their 20-year management plans, water suppliers must directly address the subject of future population growth. The suppliers must also identify sources of supply to meet demand. The plan must “identify and quantify, to the extent practicable, the existing and planned sources of water available to the supplier.” In identifying these future water sources, the suppliers need not conduct environmental review.

Senate Bill 901: Water Supply and Demand Reliability Assessment (Cal. Water Code Section 10910). Signed into law on October 16, 1995, Senate Bill 901 (SB 901) requires every urban water supplier to identify as part of its UWMP the existing and planned sources of water available to the supplier over a prescribed five-year period. SB 901 requires additional information to be included as part of an urban water management plan if groundwater is identified as a source of water available to the supplier. Provisions of SB 901 would require an urban water supplier to include in the plan a description of all water supply projects and programs that may be undertaken to meet total project water use. A city or county shall request each public water system serving a project to assess the projected water demand associated with said project and an assessment of whether the projected water demand associated with selected projects was included as part of the most recent UWMP. As part of this assessment, the public water system is required to indicate whether its total projected water supplies available during normal, single-dry, and multiple-dry water years will meet the project demand associated with the proposed WLC project, in addition to the public water system’s existing and planned uses.

Pursuant to Section 10912 of the State Water Code, a “project” is specifically defined as development meeting any of the following criteria:

- 500 or more dwelling units;
- Commercial center employing more than 1,000 persons or having more than 500,000 square feet;
- Office building employing more than 1,000 persons or having more than 250,000 square feet;
- A hotel/motel with 500 or more rooms;
- An industrial, manufacturing, processing plant, or industrial park employing more than 1,000 persons or occupying more than 40 acres, or having more than 650,000 square feet of floor area;
- A mixed-use project that would demand an amount of water equal to the amount of water required by a 500-dwelling unit project; or
- In areas where the public water system has fewer than 5,000 service connections, any development that would increase water demand by 10 percent or greater in the number of existing service connections, or in the case of a mixed-use development, an increase in water required by residential development representing a 10 percent or greater increase in the number of existing service connections.

After receiving such information, cities and counties may agree or disagree with the conclusions of the water purveyors, but cannot approve projects in the face of documented water shortfalls without first making certain findings.

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The proposed WLC project is an Industrial Specific Plan that would meet the definition of a “project” and the water purveyor (EMWD) is therefore required to conduct a Water Supply Assessment (included as Appendix J) to indicate a reliable supply of water for the proposed WLC project.

Senate Bill 610: Water Supply Planning (Cal. Water Code Section Sections 10910 through 10915). Signed into law October 9, 2001, Senate Bill 610 (SB 610) resulted in amendments to Section 21151.9 of the Public Resources Code. Additionally, several sections of the Water Code were amended, one was repealed, while portions of one section were added and/or repealed. Revising provisions established by SB 901 and SB 610 requires that any city or county having determined that a project is subject to CEQA identify any public water systems that may supply water for the project and to request those public water systems to prepare a specified water supply assessment if the project exceeds the specified threshold for a water supply assessment (WSA). Such an assessment would include, among other information, the following:

- Identification of existing water entitlements, water rights, or water service contracts relevant to the water supply identified for a proposed WLC project; and
- The amount of water received pursuant to such entitlements, rights, or contracts.

SB 610 requires the public water system, city, or county to submit plans for acquiring the required water supply for the proposed WLC project if the WSA concludes that water supplies are or will become insufficient. Any such WSA and other information would be included in the environmental document prepared for the project pursuant to CEQA. A WSA¹ was prepared for the proposed WLC project to identify existing water entitlements, water rights, and/or water service contracts relevant to the water supply as it relates to the operation of the proposed WLC project.

City of Moreno Valley General Plan. The following policies within the *Community Development Element* and *Conservation Element* of the *City of Moreno Valley General Plan* pertain to utilities and are applicable to the proposed WLC project.

Community Development Element Policies

Policy 2.11.1 Permit new development only where and when adequate water services can be provided.

Policy 2.13.1 Limit the amount of development to that which can be adequately served by public services and facilities, based upon current information concerning the capability of public services and facilities.

Policy 2.13.2 Unless otherwise approved by the City, public water, sewer, drainage and other backbone facilities needed for a project phase shall be constructed prior to or concurrent with initial development within that phase.

Policy 2.13.3 It shall be the ultimate responsibility of the sponsor of a development project to ensure that all necessary infrastructure improvements (including system-wide improvements) needed to support project development are available at the time that they are needed.

The following changes have been made in response to Comment F-13-32 in Letter F-13 from Johnson & Sedlack on Behalf of Sierra Club, Moreno Valley Group & Residents for a Livable Moreno Valley.

¹ Water Supply Assessment for the World Logistics Center Specific Plan, EMWD, March 21, 2012.

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Conservation Element Policies and Objectives

Policy 7.3.1 Require water-conserving landscape and irrigation systems through development review. Minimize the use of lawn within private development, and within parkway areas. The use of mulch and native and drought-tolerant landscaping shall be encouraged.

Policy 7.3.2 Encourage the use of reclaimed wastewater, stored rainwater, or other legally acceptable non-potable water supply for irrigation.

Objective 7.5 Encourage efficient use of energy resources.

Policy 7.5.5 Encourage the use of solar power and other renewable energy systems.

4.16.1.3 Methodology

The WSA is based on evaluating the existing water supply available to the City, future water supply that is anticipated to be available to the City, and the identification of existing water demand and future demand with the development of the proposed WLC project. The analysis also identifies water conservation measures that would be incorporated by the proposed WLC project to reduce the project's total water demand, with special reference to outdoor water usage and associated landscaping systems.

4.16.1.4 Thresholds of Significance

The following thresholds of significance regarding impacts to utilities and service systems are based on the recommended questions contained in *Guidelines for California Environmental Quality Act* (as amended through January 1, 2011). A project would have a significant impact on the provision of utilities or service systems related to water supply if it would result in any of the following:

- Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and/or
- Have insufficient water supplies available to serve the project from existing entitlements and resources, or need new or expanded entitlements.

For the purpose of this EIR, significant and unavoidable impacts would occur if the aforementioned conditions cannot be overcome by reasonable design, construction, and maintenance practices.

4.16.1.5 Less than Significant Impacts

4.16.1.5.1 Construction or Expansion of Water Treatment Facilities

Threshold	Would the proposed WLC project require the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?
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As previously identified, Metropolitan currently does not have surplus water available, due in part to pumping restrictions imposed on the SWP to avoid and minimize impacts to Federal- and State-protected fish species in the Delta. Imported sources of water will be supplemented by an increase in desalination of brackish groundwater, recycled water use, and water use efficiency. Metropolitan and the EMWD have analyzed the reliability of water delivery through the SWP and the Colorado River

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Aqueduct. Metropolitan's IRP and 2010 RUWMP conclude that, with the storage and transfer programs developed by Metropolitan, there will be a reliable source of water to serve its member agencies' needs through 2035. Based on the WSA prepared for the proposed WLC project, water demand for the proposed on-site uses would total approximately 1,991.25 AFY.¹ As identified in previously referenced Table 4.16.A, anticipated water supplies for the EMWD total 213,900 and 302,200 AFY in 2015 and 2035. The water demand required for the proposed WLC project totals 0.93 and 0.66 percent of the 2015 and 2035 projected EMWD supplies.

The EMWD's *2010 Urban Water Management Plan* and Metropolitan's *2010 Regional Urban Water Management Plan*² have stated that, with the addition of all existing and planned water supplies, it would have the ability to meet all of its member agencies' projected supplemental demand through 2035, despite the latest ruling regarding the allocation of SWP water. This is based on continued commitment to conservation programs, water recycling, and development of local water resources.

While the EMWD is capable of meeting all of its member agencies' projected demand through 2035, other efforts are taken to further reduce the retail demand due to demographics change and population growth. Passive conservation efforts already implemented by the EMWD include adherence to the plumbing code and installation of low-flow toilets and showerheads in all new construction. In addition to passive programs, active conservation programs/measures are also implemented. The EMWD has implemented all of the California Urban Water Conservation Council (CUWCC) and Best Management Practices (BMPs). The CUWCC was created to increase efficient water use throughout the State through partnership with urban water agencies (including the EMWD), public interest organizations, and private entities. In 1992, the EMWD signed the CUWCC's Memorandum of Understanding (MOU) Regarding Water Conservation in California and committed to developing and implementing fourteen comprehensive BMPs for urban water management.

The BMPs correspond to the fourteen Demand Management Measures (DMMs) listed in the Water Code Section 10631 (f) and include the following:

- Water survey programs for single-family residential and multifamily customers;
- Plumbing retrofits;
- Distribution system water audits, leak detection, and repair;
- Metering with commodity rates;
- Large landscape water audits and incentives;
- High-efficiency washing machine rebates;
- Public information;
- School education;
- Commercial, industrial, and institutional water conservation;
- Wholesale agency programs;
- Conservation pricing;
- Conservation corridor;
- Water waste prohibition; and
- Ultra-low flush toilet replacements.

¹ 0.75 acre-foot per acre × 2,655 acres = 1,991.25 acre-feet per year.

² *The Metropolitan Water District of Southern California Regional Urban Water Management Plan*, Metropolitan Water District of Southern California, November 2010.

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With implementation of passive and active conservation measures, the EMWD can significantly reduce its retail water demand and continue to do so in the future.

As previously identified, Metropolitan has analyzed the reliability of water delivery through the SWP and the Colorado River Aqueduct. Metropolitan's IRP and 2010 RUWMP conclude that, with the storage and transfer programs developed by Metropolitan, there will be a reliable source of water to serve its member agencies' needs through 2035.

The amount of water demand would be within the existing available supply even with a reduction in deliveries from the SWP. Imported sources of water will be supplemented by an increase in desalination of brackish groundwater, recycled water use, and water use efficiency, and implementation of aggressive conservation measures by the EMWD. The proposed WLC project would not require the construction of new water treatment facilities or expansion of existing facilities, which could cause significant environmental effects.

Annually, a 5-year Capital Improvement Plan (CIP) is prepared by the EMWD. The EMWD's CIP outlines specific projects and their funding sources. Each project is also submitted individually to the Board for authorization and approval. This allows the EMWD to match needed facilities with development trends accurately. Funding for the EMWD's microfiltration plants, distribution pipes, and the recharge and recovery program is listed in the most recent EMWD CIP.

All necessary water distribution facilities would be installed simultaneously with required roadway frontage improvements for each phase of development of the proposed WLC project. Therefore, the connection to the existing water delivery system would not result in substantial disturbance of existing roadways or water facilities. As previously identified, the potable water demand that would be required for the proposed WLC project would total 1,991.25 AFY. The amount of water demand would be within the existing available supply even with a reduction in deliveries from the SWP. Imported sources of water will be supplemented by an increase in desalination of brackish groundwater, recycled water use, and water use efficiency, and implementation of aggressive conservation measures by the EMWD. The proposed WLC project would not require the construction of new water treatment facilities or expansion of existing facilities, which could cause significant environmental effects.

It should be noted that the water consumption estimates in this section for future logistics uses within the WLCSP are likely overestimated by a significant factor, as a result of the emphasis on xeriscape or low-impact development (i.e., water conserving) design in the WLCSP. Sections 1.3.2 and 5.4) of the Specific Plan indicates that project design will incorporate features such as low-flow faucets and fixtures, rainwater harvesting systems for irrigation (where practical), and native non-irrigated landscaping to reduce the project's reliance on water. The size and composition of the landscape palette and the landscaping plan of the Specific Plan were developed in consultation with Robert Perry, a well-known horticultural scientist with many years of experience with drought-tolerant and low-water maintenance landscaping. Although water consumption on the WLC property will likely be much lower than anticipated, the analysis of environmental impacts relative to water consumption used a "worst-case" scenario as outlined in the WSA prepared by the EMWD (March 21, 2012).

Adherence to standard requirements identified by EMWD and the City associated with the design and installation of new water infrastructure, including the additional water storage tanks and connections to existing and future water infrastructure, would ensure that no significant impacts would result from the construction or operation of the proposed WLC project. Therefore, impacts related to this issue would be less than significant and no mitigation measures would be required other than those measures recommended in other sections addressing potential impacts of off-site improvements (e.g., cultural resources and biological resources).

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In summary, development of the proposed WLC project will not result in the need for the construction of new water treatment facilities by the Eastern Municipal Water District, Metropolitan Water District of Southern California, or others. However, it will result in the need for several new water storage reservoirs, as shown in previously referenced Figure 3.7, *Offsite Improvement Areas*, and Figure 3.13, *Water System*.

4.16.1.6 Significant Impacts

4.16.1.6.1 Adequate Water Supply

Threshold	Would the proposed WLC project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
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A project-specific WSA¹ was prepared for the proposed WLC project to assess the water supply availability to the project site to satisfy the requirements under SB 610 and to make a determination that adequate water supplies are and will be available to meet the water demand associated with the proposed WLC project. In accordance with Water Code Section 10910(d) – (f), the WSA identifies:

- Any existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed WLC project, and provides a description of the quantities of water received in prior years by the public water system, under existing water supply entitlements, water rights, or water service contracts.
- If no water has been received in prior years by the public water system, identify other public water systems or water service contract holders that receive a water supply or have existing water supply entitlements, water rights, or water service contracts to the same source of water as the public water system.
- If groundwater is included in the proposed supply, identify the groundwater basin or basins from which the proposed WLC project will be supplied, and include any applicable documentation of adjudicated rights to pump. If the basin is not adjudicated, regardless of whether the basin has been identified as over-drafted, provide a detailed description and analysis of the amount and location of groundwater pumped by the public water system for the past five years from any groundwater basin from which the proposed WLC project will be supplied, and provide a detailed description and analysis of the amount and location of groundwater from the basin or basins from which the proposed WLC project will be supplied to meet the projected water demand associated with the proposed WLC project.

There has been a shift in the water demand patterns in the last 15 years, as the residential market has replaced the agricultural market as the largest local consumer of water. Metropolitan, based on its 2010 RUWMP,² has stated that, with the addition of all water supplies existing and planned, it would have the ability to meet all of its member agencies' projected supplemental demand through 2035 even under a repeat of a worst drought scenario. Based on this assertion, the EMWD has stated it is able to meet an increased demand for water over the next 20 years, even during drought conditions. This is based on continued commitment to conservation programs, additional water recycling, and continued development of local water resources.

It should be noted that the project site currently contains several non-potable agricultural water wells, but no yields from these wells were used to calculate water supply or demand related to the proposed project.

¹ *Water Supply Assessment for the World Logistics Center Specific Plan*, EMWD, March 21, 2012.

² IRPSIM is a sophisticated water supply and demand-balancing model that utilizes 77 sequential hydrologies to determine variations in supply and demand due to changes in weather conditions.

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The EMWD continues to work closely with Metropolitan in the implementation of water management plans as a means of ensuring the reliability of the EMWD’s water supplies. Efforts to ensure reliable water supplies include the preparation and/or implementation of Groundwater Management Plans, Desalination Program, Seasonal Storage, and Conjunctive Use Water Recycling. The EMWD’s 2010 UWMP presents fifteen DMMs related to water conservation and water recycling programs split into two types (Foundational and Programmatic).

The potable water demand estimated for the proposed WLC project is within the limit of retail growth projected by the EMWD. Table 4.16.B presents the EMWD’s total water use. To develop the projections used in the WSA, the EMWD used a development-tracking database that assesses future water demands for specific projects. The EMWD uses this database to help plan for future water supply and infrastructure needs by monitoring new projects through various stages of development. Changes in density and land use are also tracked in this database for planning purposes.

Table 4.16.B: EMWD Average Water Demand (2010–2035)

Demand Sources (acre-feet/year)	Actual	Projected				
	2010	2015	2020	2025	2030	2035
Retail Potable Water Sales	77,700	113,800	120,700	136,100	150,300	162,200
Water Sales to Other Agencies	27,100	47,600	61,600	65,000	69,000	72,400
Other Water Uses/Losses	49,900	52,500	59,100	64,200	66,300	67,600
Total Average Demand	154,700	213,900	241,400	265,300	285,600	302,200

Source: *Water Supply Assessment, Table 9, EMWD, March 21, 2012.*

The EMWD’s 2010 UWMP also discusses the supply reliability for the EMWD during dry years. The supply for dry years is driven by demand. Demand increases slightly (less than 2%) during dry years, primarily due to the increased demand in winter for landscaping or agricultural water, and can be decreased up to 10 percent due to conservation as dry periods are extended. Tables 4.16.C, 4.16.D, and 4.16.E present estimates of demand from 2015 to 2035 in five-year increments for an average year, single dry year, and multiple dry years, respectively.

Neither groundwater production nor recycled water deliveries are expected to increase or decrease significantly during dry years. The EMWD depends on Metropolitan to supply additional water during dry years. Based on Metropolitan’s 2010 RUWMP, the EMWD is confident of its ability to meet customer demands beyond the next 20 years in all reasonably predictable hydrological scenarios. For water shortages and interruptions, the plans and policies outlined in the RUWMP will be implemented.

Table 4.16.C: EMWD Water Resources, Average Year Hydrology (2015–2035)

Water Conditions ¹	2015	2020	2025	2030	2035
Metropolitan Water District	149,300	170,700	190,700	210,000	226,200
Recycled Water	43,900	50,000	53,900	54,900	55,300
Groundwater	13,200	13,200	13,200	13,200	13,200
Existing Desalter	7,500	7,500	7,500	7,500	7,500
Existing Total Supplies	213,900	241,400	265,300	285,600	302,200
Total Projected Demand	213,900	241,400	265,300	285,600	302,200

¹ based on a repeat of 2004–2009 conditions

Source: *Water Supply Assessment, Table 11, EMWD, March 21, 2012.*

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Table 4.16.D: EMWD Water Resources, Single Dry Year Hydrology (2015–2035)

Water Conditions ¹	2015	2020	2025	2030	2035
Metropolitan Water District	155,300	177,600	198,300	218,300	235,100
Recycled Water	45,500	51,800	55,800	56,900	57,300
Groundwater	13,200	13,200	13,200	13,200	13,200
Existing Desalter	7,500	7,500	7,500	7,500	7,500
Existing Total Supplies	221,500	250,100	274,800	295,900	313,100
Total Projected Demand	221,500	250,100	274,800	295,900	313,100

¹ based on a repeat of 1977 conditions
Source: *Water Supply Assessment, Table 12*, EMWD, March 21, 2012.

Table 4.16.E: EMWD Water Resources, Multiple Dry Years Hydrology (2015–2035)

Water Conditions ¹	2015	2020	2025	2030	2035
Metropolitan Water District	156,600	179,000	199,800	219,900	236,900
Recycled Water	45,800	52,200	56,200	57,300	57,700
Groundwater	13,200	13,200	13,200	13,200	13,200
Existing Desalter	7,500	7,500	7,500	7,500	7,500
Existing Total Supplies	223,100	251,900	276,700	297,900	315,300
Total Projected Demand	223,100	251,900	276,700	297,900	315,300

¹ based on a repeat of 1990–1992 conditions
Source: *Water Supply Assessment, Table 13*, EMWD, March 21, 2012.

NOTE: The following revision has been added in response to Comment F-1-74 in Letter F-1 from the Center for Biological Diversity/San Bernardino Valley Audubon Society and F-11-44 in Letter F-11 from the Sierra Club.

The Water Supply Assessment considered the impact of climate change on water supplies. Climate change has the potential to affect not only local demand and supplies, but to reduce the amount of water available for import. Potential changes that may impact water supply include:

- Warmer temperatures leading to higher demand for water within EMWD’s service area and throughout California;
- Reduction in the Sierra Nevada snow pack;
- Increased intensity and frequency of extreme weather events; and
- Rising sea levels resulting in increased risk of damage from storms in the Delta, high tide event and the erosion of levees in the Delta.

One of the outcomes of climate change could be more frequent limitations on imported supplies. To limit the impact of climate change, EMWD’s long term planning focuses on the development of reliable local recourses and the implementation of water use efficiency. This includes the full utilization of recycled water and the recharge of local groundwater basins to increase supply reliability during periods of water shortage. EMWD is also focused on reducing demand for water supplies, especially outdoors. Increasing the use of local resource and reducing the need for imported water has the dual benefit of not only improving water quality reliability, but reducing the energy required to import water to EMWD’s service area. The project developer is committed to water use efficiency and minimizing the use of potable water for landscape irrigation by using low water use fixtures, drought tolerant plants and recycled water where available as outlined in Mitigation Measure 4.16.1.6.1B.

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It is anticipated that the majority of water for future development would be supplied by imported water from Metropolitan, recognizing the following conditions:

- The ability of Metropolitan to meet the demands of member agencies as described in the 2010 RUWMP as the majority of EMWD's current and future supply rely on Metropolitan's supplies. This assessment is based on representations by Metropolitan that it will provide the water requested by the EMWD for the next 20 years under the conditions set forth in Water Code Section 10910 as authorized by Water Code Section 10631(k). This assessment is subject to review, modification, or rescission in the event that regulations, court decisions, or other events reduce or impair Metropolitan's ability to provide such water.
- The cost of new water supplies will continue to increase. The developer of this project is required to help fund the acquisition of new water supplies, new treatment or recycled water facilities, and water efficiency measures for existing customers to develop new water supplies.
- New customers may also be required to pay a higher commodity rate for water used than existing customers to offset the rising costs to the EMWD for new water supplies.
- The developer will install water-efficient devices such as low-flow toilets and landscaping according to the requirements of the EMWD's water use efficiency ordinance(s) at the time of construction to reduce the impact of this project on water supplies.

Metropolitan does not place imported water limits on a member agency, but predicts the future water demand based on regional growth information. Metropolitan stated in its 2010 RUWMP that, with the addition of all water supplies, existing and planned, Metropolitan would have the ability to meet all of its member agencies' projected supplemental demand through 2035 even under a repeat of historic drought scenarios. For any short-term water shortages and interruptions caused by disaster or unprecedented drought, the plans and policies outlined in the 2010 RUWMP will be implemented.

The proposed WLC project may be conditioned by the City to construct off-site and on-site water facilities needed to distribute water throughout the project area. A plan of service for the proposed WLC project would be approved by the EMWD that would identify specific on-site improvements. The nearest recycled water line is a 24-inch transmission main located approximately 0.25 mile southwest of the project site, at the intersection of Redlands Boulevard and Cactus Avenue. Although currently active recycled water lines are not adjacent to the project site, in the future, it may be possible to serve this project site with recycled water. Irrigated landscaped areas of the proposed WLC project site will be designed to connect to the recycled water system and would utilize recycled water in landscape areas to the extent feasible. EMWD policy recognizes recycled water as the preferred source of supply for all non-potable water demands, including irrigation of recreation areas, greenbelts, open space common areas, commercial landscaping, and supply for aesthetic impoundment or other water features. The majority of irrigated landscaped areas within the project site will be designed to use recycled water to the greatest extent possible when it becomes available.

Water Demand Based on the Existing General Plan Land Uses for the Project Site. As noted in Section 3.0, *Project Description*, the Community Development Element¹ of the City's General Plan currently designates the project site as a mix of residential, commercial, business park, and open space land uses. These land use designations are based on the previously approved (1992) Moreno Highlands Specific Plan (MHSP) and were used in developing EMWD's 2010 UWMP. Table 4.16.F summarizes the current land use designations at the project site, their associated acreages, and expected water demand from the 1992 MHSP EIR. The EIR prepared for the MHSP indicated that

¹ City of Moreno Valley General Plan Community Development Element, City of Moreno Valley, July 11, 2006.

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project would consume 11.8 million¹ gallons per day (mgd) or 9,840 acre-feet/year (AFY) of water at buildout of all the residential and non-residential uses.

Table 4.16.F: Moreno Highland Specific Plan Land Use Designations and Acreages

Land Use Designation	Acreage	Demand (AFY)
Residential Community		
Residential (7,763 dwelling units)	1,359.3	4,315
Parks and Open Space	701.9	3,159
Neighborhood Commercial	10.0	22
Cemetery	16.5	74
Public Facilities	347.7	1,168
Planned Business Center		
Business Park	360.8	271
Mixed Use	80.5	218
Community Commercial	16.0	36
Parks and Open Space	77.9	351
Public Facilities	67.4	226
Total	3,038	9,840

Source: Moreno Highlands Specific Plan, 1992.

The WSA prepared for the proposed project by the EMWD concluded that the water demand for the proposed on-site uses would be approximately 1,991.25 AFY.² The EMWD considers this a “worst-case” estimate based on the total acres and amount of square footage of warehousing proposed by the project. This estimate does not take into account the proposed project landscaping design with xeriscape (drought-tolerant plants) and on-site collection of runoff and channeling it to landscaped areas to minimize irrigation on the interior of the project site. For example, the “Water Budget Technical Memorandum” prepared by CH2MHill (see Appendix N) in September 2011 for the WLC project indicates that actual water usage of on-site buildings, based on the specific development characteristics of the WLC Specific Plan, would be on the order of 450 AFY, which is less than a quarter of the amount estimated by EMWD; however, this estimate does not include on-site irrigation of landscaping and could only be achieved if all on-site landscaping was irrigated by collection and distribution of on-site runoff from roofs and hardscape areas.

Taking into account the proposed water xeriscape landscaping plan, it is likely that actual water use for development within the WLC Specific Plan will be substantially less than the worst-case EMWD estimate. Therefore, for the purposes of analysis in this EIR, both the CH2MHill figure of 450 AFY and the EMWD’s worst-case estimate of 1,991 AFY figure will be used relative to water consumption. Under either scenario, the anticipated water demand for the proposed WLC project is substantially less than what is identified above for the General Plan land uses and what was used in the formulation of the 2010 UWMP. As identified in previously referenced Table 4.16.A, anticipated water supplies in the EMWD total 213,900 and 302,200 AFY in 2015 and 2035, respectively. The water demand required for the proposed WLC project would total 0.93 and 0.66 percent of the EMWD’s 2015 and 2035 supplies under worst-case conditions. The demand estimated for this project is substantially less and therefore still within the limit of growth projected in the 2010 UWMP.

¹ Based on 27,015 population times 200 gallons/person/day and 24,019 jobs at buildout

² *Water Supply Assessment Report for the World Logistics Center Specific Plan in Moreno Valley*, Eastern Municipal Water District, March 21, 2012.

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When compared to the currently approved MHSP, there would be an 80 percent decrease in projected water demand (7,849 AFY) with the development of the proposed WLC project. The site's water usage would decrease under the current development plan for the proposed WLC project and it would remain lower than what is anticipated in the General Plan and the 2010 UWMP. Additionally, the increased water demand for the site has been analyzed by the WSA, which determined that a suitable water supply exists for the proposed WLC project well into the future.

The project's water consumption represents substantially less than 1 percent of the consumption yearly capacity and because the EMWD indicates that water to service the project's proposed industrial uses is available, no significant water supply impacts would occur with implementation of the industrial use, and no mitigation would be necessary.

Metropolitan is currently engaged in planning processes that will identify solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, the EMWD has determined that it will be able to provide adequate water supply to meet the potable water demand for the project in addition to existing and future users. However, until these supplies are secured, potential impacts of the proposed project on regional water supplies may be significant, and mitigation is required.

Specific Plan Design Features. Section 6.0 of the Specific Plan requires the careful use of xeriscape or drought-tolerant vegetation with minimal mechanical irrigation to minimize water use for landscaping. Sections 4.2 and 5.4 require implementation of water-conserving landscaping and Section 5.2.3 provides architectural design guidelines that will help minimize the consumption of water for landscape irrigation.

Mitigation Measures. The following measures are recommended to help ensure that the proposed WLC project will have less than significant impacts on long-term regional water supplies.

4.16.1.6.1A Prior to approval of a precise grading permit for each plot plan for development within the World Logistics Center Specific Plan (WLCSP), the developer shall submit landscape plans that demonstrate compliance with the World Logistics Center Specific Plan, the State of California Model Water Efficient Landscape Ordinance (AB 1881), and Conservation in Landscaping Act (AB 325). This measure shall be implemented to the satisfaction of the Planning Division. Said landscape plans shall incorporate the following:

- Use of xeriscape, drought-tolerant, and water-conserving landscape plant materials wherever feasible and as outlined in Section 6.0 of the World Logistics Center Specific Plan;
- Use of vacuums, sweepers, and other "dry" cleaning equipment to reduce the use of water for wash down of exterior areas;
- Weather-based automatic irrigation controllers for outdoor irrigation (i.e., use moisture sensors);
- Use of irrigation systems primarily at night or early morning, when evaporation rates are lowest;
- Use of recirculation systems in any outdoor water features, fountains, etc.;
- Use of low-flow sprinkler heads in irrigation system;

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- Provide information to the public in conspicuous places regarding outdoor water conservation; and
- Use of reclaimed water for irrigation if it becomes available.

4.16.1.6.1B All buildings shall include water-efficient design features outlined in Section 4.0 of the World Logistics Center Specific Plan. This measure shall be implemented to the satisfaction of the Land Development/Public Works. These design features shall include, but not be limited to the following:

- Instantaneous (flash) or solar water heaters;
- Automatic on and off water facets;
- Water-efficient appliances;
- Low-flow fittings, fixtures and equipment;
- Use of high efficiency toilets (1.28 gallons per flush [gpf] or less);
- Use of waterless or very low water use urinals (0.0 gpf to 0.25 gpf);
- Use of self-closing valves for drinking fountains;
- Infrared sensors on drinking fountains, sinks, toilets and urinals;
- Low-flow showerheads;
- Water-efficient ice machines, dishwashers, clothes washers, and other water-using appliances;
- Cooling tower recirculating system where applicable;
- Provide information to the public in conspicuous places regarding indoor water conservation; and
- Use of reclaimed water for wash down if it becomes available.

4.16.1.6.1C Prior to approval of a precise grading permit for each plot plan, irrigation plans shall be submitted to and approved by the City demonstrating that the development will have separate irrigation lines for recycled water. All irrigation systems shall be designed so that they will function properly with recycled water if it becomes available. This measure shall be implemented to the satisfaction of the City Planning Division and Land Development Division/Public Works.

Level of Impact After Mitigation. With implementation of the recommended mitigation measures, expected impacts to water supply over the long term will be reduced to less than significant levels.

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4.16.1.6.2 Storm Water Drainage Requirements

Threshold	Would the proposed WLC project result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
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As identified in the *Draft Master Plan of Drainage Report for World Logistics Center Specific Plan and Environmental Impact Report*¹ (Draft Drainage Report) and Section 4.9, *Hydrology and Water Quality*, the proposed WLC project storm water flows from the project site eventually drain into the Perris Valley Storm Channel (PVSC) then into Reach 3 of the San Jacinto River. The storm channel is owned and maintained by the Riverside County Flood Control and Water Conservation District (RCFCWCD). Flows routed to the PVSC are transported through Perris Valley and ultimately to the San Jacinto River. Flows are then conveyed through the San Jacinto River, Canyon Lake, again to the San Jacinto River (Reach 1), and ultimately to Lake Elsinore. In the event Lake Elsinore is at or beyond capacity, flows continue through Temescal Creek, the Santa Ana River (Reaches 1–3) and then to the Pacific Ocean.

It is anticipated that the development of these logistics warehouse facilities would include the construction of buildings, parking areas, sidewalks, roads and other infrastructure such as water, recycled water, and sewer infrastructure features. Because the development of the proposed WLC project would introduce a greater percentage of impervious surfaces, the post-development flow volumes generated on site are anticipated to be substantially higher than the pre-development flows.

Conditions resulting from this change would include increased runoff volumes and velocity; reduced infiltration; increased flow frequency, duration, and peak; shorter time to reach peak flow; and degradation in water quality. The majority of the proposed WLC project area currently has a low runoff coefficient, meaning that runoff during storms represents a relatively small portion of the total rainfall. The majority of the precipitation, particularly in smaller storms, infiltrates into the subsurface. The development of the proposed WLC project with impervious surfaces (such as roadways, parking lots, and buildings) would result in a condition in which nearly all rainfall becomes runoff. A significant impact would occur in the event that post-development storm water flows are greater than pre-development storm water flows leaving the site.

As detailed in the *Draft Master Plan of Drainage Report*,² the storm water runoff from the proposed WLC project site generally flows in a southerly direction toward the San Jacinto River. A topographic divide generally located west of Theodore Street separates storm water flows to the San Jacinto River in two directions. Runoff east of the divide flows at a gradient ranging from 1 to 2 percent toward the San Jacinto Wildlife Area (SJWA) and ultimately drains toward the Gilman Hot Springs hydro-subarea; and runoff west of the divide flows to the Perris Valley Storm Drain at a gradient ranging from 1 to 2 percent and ultimately drains toward the Perris Valley hydro-subarea. Both hydro-subareas eventually flow to the San Jacinto River, approximately 10 miles south of the project site. The project site is located in the Moreno Valley drainage area and is tributary to the San Jacinto River.

The westerly portion of the proposed WLC project site is located within the Moreno Master Drainage Plan (MMDP). The existing MMDP indicates that storm flows north of SR-60 will be routed to the proposed Sinclair Detention Basin. Flows released from the proposed basin will pass under SR-60 through the existing culverts and be conveyed to the drainage system identified as Line “F” in MMDP. The proposed basin will not be constructed prior to the proposed WLC project; therefore, this analysis

¹ *Draft Master Plan of Drainage Report for World Logistics Center Specific Plan and Environmental Impact Report*, CH2M Hill, September 2014.

² *Ibid.*

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assumes that the Sinclair Detention Basin is not in place prior to construction and operation of the proposed WLC project.

As detailed in the *Draft Master Plan of Drainage Report*, storm flows originating from the Badlands reaching SR-60 are conveyed through a series of five culverts under SR-60 between Redlands Boulevard and Theodore Street, to earthen ditches that flow in a southerly direction. Based on the Logistic Building Runoff Management Plan (LBRMP) prepared by RBF in 2008, some of the culverts were partially blocked by sediment and debris allowing little flow from the culverts to enter the proposed WLC project site thus attenuating the flow during a 100-year storm event. Drainage peak flow rates from water ponds north of SR-60 are reduced due to the capacity of the existing culverts. As part of the construction of the Highland Fairview Corporate Park (HFCP) project, these existing culverts were combined into a 12-foot by 8-foot reinforced concrete box (RCB).¹ The RCB drains to the south along the west side of the logistics building within the HFCP project. A 36-inch and 42-inch storm drain underlying Eucalyptus Avenue join the RCB. The outflow from the drainage system sheet flows via a spreading area in to the agricultural land downstream. Farther south, the agricultural land drains to a RCFCWCD earthen channel at Redlands Boulevard, which flows to a Greenbelt Channel located south of Cactus Avenue and East of Redlands Boulevard and ultimately drains to the Perris Valley Storm Drain. Along the east side of Redlands Boulevard from Dracaea Street to the earthen channel collects flows from the west side of the project boundary. The v-ditch also outlets to the existing RCFCWCD earthen channel.

Open ditches along the Theodore Street convey runoff from adjacent areas. A series of existing drainage culverts crosses Gilman Springs Road conveying off-site runoff from the Badlands area onto the project site. Four of these culverts drain into somewhat defined natural drainage courses and drain into the SJWA. The existing culverts along Gilman Springs Road are undersized and therefore inadequate. The culverts provide some level of peak flow mitigation under a 100-year storm event; however, runoff will pond and overtop the road crossing onto the eastern portion of the proposed WLC project site. Therefore, the existing drainage courses in this area are undersized for the 100-year flow.

Previously referenced Tables 4.9.L, 4.9.M and 4.9.N (Section 4.9, *Hydrology and Water Quality*) identify changes in the flows, velocities, and volume of storm water runoff that would result from the development of buildings and impermeable surfaces without and with the development of the on-site basins. Due to the installation of impervious surfaces on the project site, the post-development flows would be higher than the pre-development flows. To avoid a significant impact to the existing drainage capacity, the post-development flows coming from the proposed WLC project site are required to be equal to or less than pre-development flows.² To reduce flows to below or equal to pre-development conditions, the on-site storm water flows would be routed to a series of on-site detention and infiltration basins³ by phase before flows are routed off site. While the increase in impervious surfaces attributable to the proposed WLC project would contribute to a greater volume and higher velocity of storm water flows, the proposed WLC project's detention and infiltration basins would accept and accommodate runoff that would result from project construction at pre-project conditions (previously referenced Tables 4.9.L, 4.9.M, and 4.9.N).

¹ The drainage facilities planned in the RCFCWCD MMDP (dated April 1991) were considered and incorporated in to the RCB storm drain system.

² As part of the MS4 Permit issuance requirements, projects must identify any Hydrologic Conditions of Concern and demonstrate that changes to hydrology are minimized to ensure that post-development runoff rates and velocities from a site do not adversely impact downstream erosion, sedimentation or stream habitat.

³ A detention basin is an area where excess storm water is stored or held temporarily and then slowly drains when water levels in the receiving channel recede. In essence, the water in a detention basin is temporarily detained until additional room becomes available in the receiving channel.

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As identified in the *Draft Master Plan of Drainage Report*¹ prepared for the project, the hydrology analysis consisted of dividing the area into six existing and proposed off-site and on-site tributary areas (A through F; refer to previously referenced Figure 4.9.1). There are five proposed drainage systems to be constructed as part of the proposed WLC project and are identified as Line A (consistent with Line F in the MMDP), Line B, Line C, Line D, and Line F as depicted in previously referenced Figure 4.9.4. Hydrologic modeling results identify that the 100-year 3-hour storm provides the highest peak flows.

The land uses and roadway facilities proposed under the Specific Plan would require modifications to the existing sub watersheds of the project vicinity. Table 4.16.G provides a comparison of the existing and proposed drainage areas and shows the proposed modifications to the existing sub watersheds would not substantially alter the existing drainage pattern of the project vicinity. A comparison of the total area in acres shows no change.

Table 4.16.G: Comparison of Existing and Proposed Drainage Areas

Existing Condition			Proposed Condition		
Watershed	Area (acres)	Hydro-subarea	Watershed	Area (acres)	Hydro-subarea
A	2,657	Perris Valley	A	2,746	Perris Valley
B	1,361	Gilman Hot Springs	B	1,147	Gilman Hot Springs
C	1,061	Gilman Hot Springs	C	1,149	Gilman Hot Springs
D	965	Gilman Hot Springs	D	1,013	Gilman Hot Springs
E	2,510	Gilman Hot Springs	E	2,545	Gilman Hot Springs
F	445	Gilman Hot Springs	F	399	Gilman Hot Springs
Total	8,999			8,999	

Source: Table 4.1, Draft Master Plan of Drainage Report, CH2MHILL, September 2014

To adequately contain and store the greatest volume that would be generated during the 2-year, 5-year, 10-year, and 100-year storm events (i.e., 100-year 3-hour storm event), the project site would require the construction of on-site detention and infiltration basins, on-site culverts, and on-site energy dissipaters. Table 4.16.H provides a comparison of the existing and proposed storm water runoff for the 100-year 3-hour storm events. As shown in Table 4.16.H, the proposed WLC project site in the existing condition currently discharges at a rate of 2,470 cfs to the Perris Valley Hydro-Subarea and 5,250 cfs to the Gilman Hot Springs Hydro-Subarea. With the installation of the on-site detention basins, culverts, and energy dissipaters, expected discharges that would occur as a result of development of the site under the Specific Plan would discharge at a rate of 2,170 cfs to the Perris Valley Hydro-Subarea and 4,665 cfs to the Gilman Hot Springs Hydro-Subarea, which is less than the existing condition.

Table 4.16.H: Comparison of Existing and Proposed Storm Water Runoff for 100-Year 3-Hour Storm Event

Hydro-Subarea	Watershed	Existing Condition	Proposed Condition
		Peak Discharge (cfs)	
Perris Valley	A	2,470	2,170
	B	1,130	930
Gilman Hot Springs	C	820	750
	D	815	795

¹ *Draft Master Plan of Drainage Report for World Logistics Center Specific Plan and Environmental Impact Report*, CH2M Hill, September 2014.

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Table 4.16.H: Comparison of Existing and Proposed Storm Water Runoff for 100-Year 3-Hour Storm Event

Hydro-Subarea	Watershed	Existing Condition	Proposed Condition
		Peak Discharge (cfs)	
	E	1,990	1,800
	F	495	390
	Total	5,250¹	4,665

Source: Table 4-2 Draft Drainage Report, CH2MHill, September 2014

Specific Plan Design Features. The preceding information has outlined the Drainage Master Plan (DMP) for the proposed WLCSP. The DMP is designed to retain increased on-site runoff that will occur due to the presence of more impervious surfaces (e.g., roofs, parking lots, and streets) and channel it to landscaped areas. The DMP is also designed to prevent off-site runoff from exceeding that which occurs under existing conditions. Section 6.0 of the Specific Plan requires the careful use of xeriscape or drought-tolerant vegetation with minimal mechanical irrigation to minimize water use for landscaping. Sections 4.2 and 5.4 require implementation of water-conserving landscaping, and Section 5.2.3 provides architectural design guidelines that will help minimize the consumption of water for landscape irrigation.

In addition to the Specific Plan design features, the following mitigation is recommended to ensure that impacts associated with project-related drainage capacity are reduced to less significant levels.

Mitigation Measures. Implementation of **Mitigation Measure 4.16.1.6.2A** would ensure that the proposed WLC project would not result in storm water drainage flows that would require the construction of new storm water drainage facilities or expansion of existing storm water drainage facilities that would in turn cause significant environmental effects.

4.16.1.6.2A Each Plot Plan application for development shall include a concept grading and drainage plan, with supporting engineering calculations. The plans shall be designed such that the existing sediment carrying capacity of the drainage courses exiting the project area is similar to the existing condition. The runoff leaving the project site shall be comparable to the sheet flow of the existing condition to maintain the sediment carrying capacity and amount of available sediment for transport so that no increased erosion will occur downstream. This measure shall be implemented to the satisfaction of the City Land Development Division/Public Works.

Level of Significance after Mitigation. Adherence to **Mitigation Measure 4.16.1.6.2A** would result in the project's compliance with the City's existing storm water infrastructure requirements, reducing the potential impact associated with storm water drainage capacity to a less than significant level. Discussion of hydrological impacts from construction and operation of the WLC project are addressed in Section 4.9.6.1, *Construction-Related Water Quality Impacts*, and Section 4.9.6.2, *Operational Water Quality Impacts*.

4.16.1.7 Cumulative Impacts to Water Supply Services

The cumulative area for water supply-related issues is the EMWD service area (previously referenced Figure 4.16.1). Existing and future development within the EMWD's service area would demand additional quantities of water. The adopted UWMP (2010) projects population within the EMWD

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service area to increase to 1,111,729 persons by the year 2035. Increases in population, square footage, and intensity of uses would contribute to increases in the overall regional water demand. The anticipated conversion of water-intensive uses (i.e., agriculture) and the implementation of existing water conservation measures and recycling programs would reduce the need for increased water supply.

As previously identified, Metropolitan will continue to rely on the plans and policies outlined in its RUWMP and IRP to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands. An aggressive campaign for voluntary conservation and recycled water usage, curtailment of groundwater replenishment water and agricultural water delivery are some of the actions outlined in the RUWMP. As previously stated, Metropolitan currently does not have surplus water available, due in part to pumping restrictions imposed on the SWP in place to avoid and minimize impacts to Federal- and State-protected fish species in the Delta. However, Metropolitan has analyzed the reliability of water delivery through the SWP and the Colorado River Aqueduct. Metropolitan's IRP and RUWMP conclude that, with the storage and transfer programs developed by Metropolitan, there will be a reliable source of water to serve its member agencies' needs through 2035. The EMWD would have water supplies for projected growth through 2035 in wet, dry, and multiple-dry years, so cumulative impacts to water supply would be less than significant. The proposed WLC project would connect to existing conveyance infrastructure and adequate treatment capacity is available, so the proposed WLC project would not make a significant contribution to any cumulatively considerable impacts on water supply or infrastructure.

With implementation of the WLC Specific Plan as proposed and **Mitigation Measures 4.16.6.1A** through **4.16.6.1C**, potential cumulative impacts to regional long-term water supplies will not be cumulatively considerable.

4.16.2 Wastewater Services

4.16.2.1 Existing Setting

The EMWD and the Edgemont Community Services District (ECSD) provides wastewater (sewer) services in the City of Moreno Valley. The EMWD provides wastewater treatment, collection, and disposal service to most of the City and surrounding area and the ECSD provides sewer service to a small area in the southwestern portion of the City limits. The EMWD owns, operates, and maintains four regional water reclamation facilities including the Moreno Valley Regional Water Reclamation Facility (MVRWRF). The MVRWRF facility is located south of the City limits and east of Perris Boulevard, south and adjacent to Mariposa Avenue. The MVRWRF treats domestic, commercial, and industrial wastewater, and currently accepts an average daily flow of approximately 11.2¹ mgd, with an existing capacity of approximately 16 mgd.² Reclaimed water from the MVRWRF is primarily used to irrigate agriculture lands, greenbelts, and median strip areas. The existing development on the site (seven residences and associated farming facilities) is served by private septic tank systems. An existing sewer pipeline is located underlying Redlands Boulevard along the western perimeter of the project limits and Fir Avenue along the northern perimeter of the project limits.

NOP/Scoping Comments. No comments were received during the scoping period specifically regarding wastewater service.

¹ Plus 0.4 mgd diverted to the Perris Valley Regional Water Reclamation Facility.

² Eastern Municipal Water District Moreno Valley Regional Water Reclamation Facility, <http://www.emwd.org/modules.aspx?documentid=1423>, website accessed April 3, 2012.

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4.16.2.2 Existing Policies and Regulations for Wastewater Services

Federal Water Pollution Control Act The major piece of Federal legislation dealing with wastewater is the Federal Water Pollution Control Act, which is designed to restore and preserve the integrity of the nation's waters. In addition to the Federal Water Pollution Control Act, other Federal environmental laws have a bearing on the location, type, planning, and funding of wastewater treatment facilities.

Regional Water Quality Control Board. Operation of the MVRWRF is subject to regulations set forth by the California Department of Health Services (DHS) and the Regional Water Quality Control Board (RWQCB). NPDES permits are required for operators of publically owned treatment works, municipal separate storm sewer systems (MS4s), construction, projects, and industrial facilities who discharge to surface waters within the City.

City of Moreno Valley General Plan. The following are policies in the City's General Plan that pertain to wastewater services and are applicable to the proposed WLC project:

Community Development Element

- Policy 2.12.1** Prior to the approval of any new development application, ensure that adequate septic or sewer service capacity exists or will be available in a timely manner.
- Policy 2.13.1** Limit the amount of development to that which can be adequately served by public services and facilities, based upon current information concerning the capability of public services and facilities.
- Policy 2.13.2** Unless otherwise approved by the City, public water, sewer, drainage and other backbone facilities needed for a project phase shall be constructed prior to or concurrent with initial development within that phase.
- Policy 2.13.3** It shall be the ultimate responsibility of the sponsor of a development project to ensure that all necessary infrastructure improvements (including system-wide improvements) needed to support project development are available at the time that they are needed.

4.16.2.3 Methodology

The methodology of determining wastewater service impacts is based on evaluating the existing wastewater infrastructure and capacity available to the City, future wastewater demand and capacity that is anticipated to be available to the City, and the identification of existing wastewater demands and future wastewater demands with the development of the proposed WLC project.

4.16.2.4 Wastewater Services Thresholds of Significance

The proposed WLC project is considered to have a significant impact on wastewater services if any of the following occurs:

- The project would exceed wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board;
- The project would result in a determination by the wastewater treatment provider, which serves or may serve the project, that it lacks adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; and/or

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- The project would require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

4.16.2.5 Less than Significant Impacts

4.16.2.5.1 Wastewater Treatment Requirements

Threshold	Would the proposed WLC project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
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Local governments and water districts are responsible for complying with Federal regulations, both for wastewater plant operation and the collection systems (e.g., sanitary sewers) that convey wastewater to the wastewater treatment facility. Proper operation and maintenance is critical for sewage collection and treatment as impacts from these processes can degrade water resources and affect human health. For these reasons, publicly owned treatment works (POTWs) receive Waste Discharge Requirements (WDRs) to ensure that such wastewater facilities operate in compliance with water quality regulations set forth by the State. WDRs, issued by the State, establish effluent limits on the kinds and quantities of pollutants that POTWs can discharge. These permits also contain pollutant monitoring, recordkeeping, and reporting requirements. POTWs that intend to discharge into the nation’s waters must obtain a WDR prior to initiating discharge.

The proposed WLC project would result in a connection to the sewer line underlying Redlands Boulevard in the vicinity of the intersection of Redlands Boulevard and Brodiaea Avenue. It is anticipated that all wastewater generated by the proposed WLC project would be routed to and treated by the MVRWRF. The MVRWRF is considered to be a POTW, so operational discharge flows treated at the MVRWRF would be required to comply with waste discharge requirements contained within the WDRs for that facility. Compliance with condition or permit requirements established by the City, and waste discharge requirements at the MVRWRF would ensure that discharges into the wastewater treatment facility system from the operation of the proposed WLC project would not exceed applicable Santa Ana RWQCB wastewater treatment requirements. Expected wastewater flows from the proposed WLC project will not exceed the capabilities of the serving treatment plant, so no significant impact related to this issue would occur and no mitigation would be required.

4.16.2.5.2 Wastewater Treatment Capacity and/or New or Expanded Wastewater Treatment Facilities

Threshold	Would the proposed WLC project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it lacks adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?
Threshold	Would the proposed WLC project require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As previously noted, the proposed WLC project would connect to the existing sewer pipeline underlying Redlands Boulevard in the vicinity of the intersection of Redlands Boulevard and Brodiaea Avenue. Wastewater flows from the proposed WLC project site would be handled by the EMWD and would be conveyed to the MVRWRF located in the southwestern portion of the City, southwest of the

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proposed WLC project site. Current capacity at this facility is 16 mgd¹ with an existing average inflow of approximately 11.2 mgd.² Under current conditions, the average daily surplus treatment capacity is approximately 4.5 mgd. Generally, water use and wastewater flows are related in that wastewater is generated from indoor water uses.

Flow from the Logistics Development is based on a factor of water use equivalent to 0.01 gpd/sf. These values were determined based on a water demand analysis and benchmarking study conducted to determine water generation factors for similar facilities as outlined in the Technical Memorandum titled *World Logistics Center Water Demands and Waste Water Generation for Buildings* dated March 13, 2012. Since this study is for Specific Plan purposes and because these wastewater generation factors are less than rates used to cover the broad spectrum of light industrial uses, a facility sizing factor was added. This factor is 2.0 times the 0.01 gpd/sf for a wastewater generation factor of 0.02 gpd/sf. Based on a square footage of 40.6 million, the wastewater generated from the logistics uses on the site is 812,000 gpd. An additional 5,100 gpd of flow was added to account for the in-project fueling station. Thus, the total wastewater generated from the site is 817,100 (0.82 mgd). The additional wastewater treatment demand of 0.82 mgd resulting from development of the proposed WLC project totals approximately 18.2 percent of current surplus treatment capacity. Improvements planned for the MVRWRF facility would increase capacity at this facility from 16 mgd to 18 mgd with an ultimate expansion of this facility of 41 mgd. The planned expansion of the MVRWRF to increase capacity from 16 mgd to 18 mgd was completed in December 2013.³ Impacts associated with wastewater facilities would be less than significant because the amount of wastewater generated by the project would be within the existing surplus treatment capacity at the MVRWRF. The proposed WLC project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, which could cause significant environmental effects. Therefore, impacts associated with wastewater facilities would be less than significant and no mitigation is required.

4.16.2.6 Significant Impacts

No impacts related to wastewater services or facilities have been identified as significant for the proposed WLC project.

4.16.2.7 Cumulative Impacts to Wastewater Facilities

The cumulative area for wastewater-related issues is the MVRWRF service area (previously referenced Figure 4.16.1). Cumulative population increases and development within the area serviced by the MVRWRF would increase the overall regional demand for wastewater treatment service. The previous treatment capacity at the MVRWRF was 16 mgd. Improvements to this facility have increased capacity at this facility to 21 mgd. Ultimate expansion of this facility is expected to be 41 mgd. The MVRWRF is expected to have adequate capacity to service the City's wastewater needs through 2030. Any proposed changes to capacity of the MVRWRF or any facility maintained by EMWD are reviewed throughout the year. EMWD has a funding and construction mechanism in place that ensures improvements to EMWD facilities occurs in a timely manner. This funding mechanism is referred to as EMWD's Sewer Financial Participation Charge Program. For all new development within the EMWD service area, the Sewer Financial Participation Charge is allocated to assist in the financing of any future collection and disposal facilities and any future sewer treatment plant facilities.

¹ 5.13 *Public Services and Utilities*, City of Moreno Valley General Plan Final EIR, July 2006.

² Eastern Municipal Water District Moreno Valley Regional Water Reclamation Facility, <http://www.emwd.org/modules.aspx?documentid=1423>, website accessed April 2, 2012.

³ Approval and Authorize an Amendment (246,044) to the Agreement with Carollo Engineers for Constuction Management and Engineering Support Services During Construction of the MVRWRF, Eastern Municipal Water District, July 2, 2014, <http://www.emwd.org/home/showdocument?id=10415>.

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Cumulative development would not exceed the capacity of the wastewater treatment system because the MVRWRF would expand as growth occurred.

The proposed WLC project would not have a cumulatively significant impact on wastewater infrastructure because the proposed WLC project would not require the expansion of existing infrastructure, only connections to existing infrastructure would be required by the project. By adhering to the wastewater treatment requirements established by the Santa Ana RWQCB through the NPDES permit, wastewater from the project site that is processed through the MVRWRF would meet established standards. As the wastewater from all development within the service area of the MVRWRF would be similarly treated under the NPDES, no cumulatively significant exceedance of Santa Ana RWQCB wastewater treatment requirements would occur.

4.16.3 Solid Waste Services

4.16.3.1 Existing Setting for Solid Waste Services

Solid waste disposal and recycling services for the proposed WLC project site would be provided by Waste Management of the Inland Empire.¹ Waste Management of the Inland Empire separates and markets recyclable materials collected within its service area. Solid wastes would primarily be transported to the Badlands Sanitary Landfill located at 31125 Ironwood Avenue in Moreno Valley. Additionally, Waste Management of the Inland Empire will also use other County landfills in the area, such as the Lamb Canyon Landfill on County land near the City of Beaumont and the El Sobrante Landfill in the City of Corona. The Badlands Sanitary Landfill is designated a Class III landfill run by the County of Riverside.² Waste types accepted at the Badlands Sanitary Landfill include agricultural, construction/demolition, industrial, mixed municipal, and tires.

The Badlands Sanitary Landfill currently has a permitted capacity of 33.5 million cubic yards with a remaining capacity of 14.7 million cubic yards.³ The tonnage of any mass of solid waste is dependent on the material (e.g., metals, paper, and green waste) and its density (compacted or uncompacted). Utilizing conversion factors from various jurisdictions, one cubic yard of compacted municipal solid waste typically weighs 750 pounds (0.37 ton).⁴ Based on this conversion factor, remaining space at the Badlands Sanitary Landfill totals approximately 5.45 million tons with an estimated closure date of January 2024. The maximum daily permitted throughput of this facility is 4,000 tons/day. The Badlands Sanitary Landfill currently accepts approximately 1,683 tons/day.⁵

Recyclable materials collected by Waste Management of the Inland Empire are handled at the Moreno Valley Transfer Station owned and operated by Waste Management, Inc. The Moreno Valley Transfer Station is a large volume transfer and processing facility that accepts the following waste types: construction and demolition materials, green materials, metals, and mixed municipal waste. The Moreno Valley Transfer Station currently has a permitted capacity of 2,600 tons per day and currently accepts 2,000 tons per day. This facility currently has the capacity to accept an additional 600 tons per day.

¹ Trash service in the City of Moreno Valley is mandatory and Waste Management of Inland Valley is the only solid waste service provider.

² Class III landfills are required to be located where adequate separation can be provided between non-hazardous solid waste and surface and subsurface waters. This class of landfill is not permitted to accept hazardous waste.

³ *Badlands Sanitary Landfill Facility/Site Summary Details*, CalRecycle website, <http://www.calrecycle.ca.gov/AA-0006/>, website accessed April 2, 2012.

⁴ <http://www.recyclemaniacs.org/doc/measurement-tracking/CURC-profile-input-form-with-conversion-guide.xls>, website accessed December 21, 2011.

⁵ Based on 2011 average; e-mail correspondence with John Farrar, Administrative Services Assistant, County of Riverside Waste Management Department, December 21, 2011.

NOP/Scoping Comments. No comments were received during the scoping period specifically regarding solid waste service.

4.16.3.2 Existing Policies and Regulations

Assembly Bill 939 (AB 939) California Integrated Waste Management Act. AB 939 was signed into law in 1989 and established a 50 percent waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Jurisdictions select and implement the combination of waste prevention, reuse, recycling, and composting that best meets the needs of their residents while achieving the diversion requirements of the Act. Cities and counties also have the flexibility to work cooperatively toward the 50 percent goal by forming a regional agency. According to the provisions of the Act, in the year 2000, waste-to-energy or biomass conversions may contribute 10 percent toward the goal, with the remaining 40 percent accomplished through source reduction, recycling, and composting. The statute also allows a time extension to meet these goals for cities and counties that experience adverse market or economic conditions.

Assembly Bill 1327 (AB 1327) California Solid Waste Reuse and Recycling Access Act of 1991. Signed into law in 1991, AB 1327 added Chapter 18 to Part 3 of Division 30 of the Public Resources Code. Chapter 18 required the California Integrated Waste Management Board (CIWMB) to develop a model ordinance for adoption of recyclable materials in development projects. Local agencies were then required to adopt the model, or ordinances of their own, in order to govern adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If a local agency had not adopted a model ordinance by that date, the CIWMB model would be adopted and enforced by the local agency.

Senate Bill 1016 (SB 1016). As previously identified, the California Integrated Waste Management Act of 1989 (AB 939) requires each jurisdiction to divert 50 percent of its solid waste from being disposed in landfills. The new per capita disposal measurement system (SB 1016, Wiggins, Chapter 343, Statutes of 2008) became effective January 1, 2009. It builds on AB 939 compliance requirements by implementing a simplified measure of local jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator: the per capita disposal rate, which uses only two factors: a jurisdiction's population and its disposal as reported by disposal facilities. SB 1016 changes how each jurisdiction's progress is measured to reach the 50 percent goal for diverting waste from landfills. This measurement is no longer determinative of compliance. In order for the CIWMB and jurisdictions to more properly focus on successful program implementation, SB 1016 shifts from the historical emphasis on using calculated generation and estimated diversion to using annual disposal as a factor when evaluating jurisdictions' program implementation.

Riverside County Integrated Waste Management Plan. The Riverside Countywide Integrated Waste Management Plan (RCIWMP), adopted by the Riverside County Board of Supervisors on January 14, 1997, and approved by the CIWMB on September 23, 1998, outlines the goals, policies, and programs the County and its cities, including the City of Moreno Valley, would implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. The RCIWMP is composed of the Riverside Countywide Summary Plan, the Source Reduction and Recycling Element (SRRE) for the County and each of its cities, the Nondisposal Facility Element (NDFE) for the County and each of its cities, the Household Hazardous Waste Element (HHWE) for the County and each of its cities, and the Riverside Countywide Siting Element.

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City of Moreno Valley General Plan. The following are policies and programs in the City’s General Plan that pertain to solid waste and are applicable to the proposed WLC project:

Conservation Element

Policy 7.8.1 Encourage recycling projects by individuals, non-profit organizations, or corporations and local businesses, as well as programs sponsored through government agencies.

Program 7-1 Support regional solid waste disposal efforts by the County of Riverside.

4.16.3.3 Methodology

The solid waste analysis is based on evaluating the existing capacity of nearby landfills that serve the City, future solid waste capacity that would be available to the City, and the identification of existing solid waste demand and future solid waste demand associated with the development of the proposed WLC project. The analysis also identifies existing City goals, policies, and programs that the City implements to reduce generated waste.

4.16.3.4 Solid Waste Services Thresholds of Significance

Based on Appendix G of the *CEQA Guidelines*, a project is considered to have a significant impact on solid waste services if it results in either of the following:

- The project would be served by a landfill with insufficient permitted capacity to accommodate the project’s solid waste disposal needs; and/or
- The project would fail to comply with applicable Federal, State, and local statutes and regulations related to solid waste.

4.16.3.5 Less than Significant Impacts

The following solid waste impacts were determined to be less than significant. Adherence to established regulations, standards, and policies would reduce potential solid waste impacts to a less than significant level.

4.16.3.5.1 Solid Waste Facilities

Threshold	Would the proposed WLC project be served by a landfill with insufficient permitted capacity to accommodate the project’s solid waste disposal needs?
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Solid waste collection is a “demand-responsive” service and current service levels can be expanded and funded through user fees without difficulty. The proposed WLC project is anticipated to generate approximately 104.6 tons of solid waste per day (38,164 tons/year).¹ Solid waste from the proposed WLC project would be hauled by Waste Management of Inland Valley and transferred to the Badlands Sanitary Landfill, located in Moreno Valley. The Badlands Sanitary Landfill has a daily permitted throughput of 4,000 tons per day, a remaining capacity of 14,730,025 cubic yards, and an

¹ South Coast Air Quality Management District. CalEEMod Manual, Appendix D, Table 10.1, Solid Waste Disposal Rate for Unrefrigerated Warehouse. <http://www.aqmd.gov/caleemod/user's-guide>. Calculation: 0.94 tons/thousand square feet/year x 40,600 thousand square feet = 38,164 tons per year.

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estimated closure date of 2024.¹ The average daily throughput at the Badlands Sanitary Landfill for 2011 is estimated at 1,683 tons/day² with a current surplus capacity totaling 2,317 tons/day.

The volume of solid waste generated by the proposed WLC project per day represents 2.6 percent of the current permitted throughput and 4.5 percent of the current surplus capacity at the Badlands Sanitary Landfill. As adequate daily surplus capacity exists at the receiving landfill, development of the proposed WLC project would not significantly affect current operations or the expected lifetime of the landfill serving the project area. No significant solid waste disposal impact would occur and no mitigation is required.

4.16.3.5.2 Solid Waste Reduction

Threshold	Would the proposed WLC project fail to comply with applicable federal, state, and local statutes and regulations related to solid waste?
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Federal, State and local governments have enacted a variety of laws and established programs to deal with the transport, use, storage, and disposal of hazardous materials to reduce the risks to public health and the environment. These laws and programs supplement existing regulations designed to control the contamination of air and water resources. There are no active landfills operating in Riverside County that accept hazardous wastes. Hazardous wastes generated within the County are disposed of at distant "Class I" landfills. The DHS regulates companies that haul hazardous waste. The California Highway Patrol (CHP) is responsible for the inspection of motor carriers that haul hazardous wastes. Inspections are made on roadways, at freeway truck scales and truck yards. The shipment of hazardous materials by truck or rail is regulated by Federal safety standards under the jurisdiction of the USDOT. Federal safety standards are also included in the California Administrative Code, Environmental Health Division. The EPA ensures that containers of hazardous materials are properly labeled with instructions for use. The California Department of Industrial Relations, Cal-OSHA Division regulates the use of hazardous materials in the workplace. Regulations governing the storage and use of hazardous materials are also contained in the Uniform Building Code and the Uniform Fire Code. The Hazardous Materials Branch (HMB) of the Environmental Health Services Division of the Riverside County Health Department operates a hazardous waste program. The HMB inspects those involved in generating, hauling, storage, treating, and disposing of these wastes. The HMB also operates mobile household hazardous waste roundups and checks loads at local landfills for hazardous wastes.

The City of Moreno Valley is responsible for meeting the requirements of AB 939 and SB 1016, which includes a 50 percent reduction in disposal by the start of 2000 and preparation of a solid waste reduction plan to help reduce the amount of solid waste disposed of at the landfills. Programs implemented by the City of Moreno Valley to satisfy the mandated reduction in solid waste include, but are not limited to, the following:

- Public outreach via print and electronic media (public education);
- Municipal solid waste ordinances and product and landfill bans (policy incentives); and
- Operation of material recovery and composting facilities (facility recovery).

The proposed WLC project would be required to coordinate with the waste hauler to develop collection of recyclable materials for the project on a common schedule as set forth in applicable

¹ *Badlands Sanitary Landfill Facility/Site Summary Details*, CalRecycle website, <http://www.calrecycle.ca.gov/SWFacilities//AA-0006/>, website accessed April 2, 2012.

² Based on 2011 average; e-mail correspondence with John Farrar, Administrative Services Assistant, County of Riverside Waste Management Department, December 2, 2012.

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local, regional, and State programs. Recyclable materials that would be recycled by the project include paper products, glass, aluminum, and plastic.

Additionally, the proposed WLC project would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991) and other applicable local, State, and Federal solid waste disposal standards, thereby ensuring that the solid waste stream to the Badlands Sanitary Landfill is reduced in accordance with existing regulations. Impacts are considered less than significant and require no mitigation.

4.16.3.6 Significant Impacts

No impacts related to solid waste services or facilities have been identified as significant for the proposed WLC project; therefore, no mitigation is required.

4.16.3.7 Cumulative Impacts to Solid Waste Services

AB 939 mandates the reduction of solid waste disposal in landfills. While the Badlands Sanitary Landfill has an estimated closure date of 2024, as previously identified, the City's waste hauler will also use other County landfills in the area (e.g., Lamb Canyon Landfill and El Sobrante Landfill). The estimated closure date of the Lamb Canyon Landfill is 2023 and the estimated closure date of the El Sobrante Landfill is 2030. With planned expansion activities of landfills in the project vicinity and projected growth rates contained in the City's General Plan EIR, sufficient landfill capacity would exist to accommodate future disposal needs through City buildout in 2030. Therefore, buildout of the City General Plan would not create demands for solid waste services that would exceed the capabilities of the County's waste management system. Consequently, cumulative impacts associated with solid waste within the City would be considered less than significant.

4.16.4 Energy Consumption

This section discusses the conditions that exist on the project site and the regulatory framework that governs the supply and demand for direct and indirect energy requirements. Appendix F of the *CEQA Guidelines* describes the energy conservation information and analyses that should be included in an EIR, including emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Energy conservation is defined in terms of decreased reliance on natural gas and oil, decreased per capita energy consumption, and increased reliance on renewable energy sources.

4.16.4.1 Existing Setting

Electricity. Southern California Edison (SCE) currently has two existing 115 kilovolt (kV) overhead power transmission lines within the proposed WLC project limits. One is located along Gilman Springs Road from the south to Eucalyptus Avenue, then east on Eucalyptus Avenue to Theodore Street and then north on Theodore Street across SR-60. The second 115 kV transmission line is located along Brodiaea Avenue from the west to Davis Road then southeast into the San Jacinto Wildlife Area. In the project area, SCE also maintains 12 kV overhead distribution lines along Redlands Boulevard, Theodore Street, and Alessandro Boulevard just west of the project site.

The proposed WLC project would be supplied electricity by Moreno Valley Electric Utility (MVEU). MVEU currently has an existing electrical substation west of the project area at the southwest corner of Moreno Beach Drive and Cottonwood Avenue. This substation currently has a capacity to distribute 28 megawatts (MW) of electricity based on two existing 28 MW units (i.e., if one unit goes off, the other unit still maintains capacity to handle the demand). Ultimate capacity of this substation is 90

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MW based on four 28 MW units. The current peak load for this substation is 22 to 26 MW; therefore, there is an existing 2 to 6 MW surplus capacity available. MVEU has underground 12 kV distribution lines along Cottonwood Avenue from the west to Redlands Boulevard, then north along Redlands Boulevard to Fir Street (now Eucalyptus Avenue), and then east along Eucalyptus Avenue to Theodore Street. The existing underground conduit underlying Eucalyptus Avenue currently serves the existing Skechers warehouse, office, and factory store. It should be noted that the MVEU indicated these assumptions are valid at this time, but could change if other development occurs before the proposed project.

Natural Gas. The proposed WLC project would be supplied natural gas by the Southern California Gas Company (SCGC). SCGC currently maintain a 4-inch medium-pressure service line underlying Redlands Boulevard that runs from SR-60 on the north to Cactus Avenue on the south and then runs west along Cactus Avenue with a stub-out to the north at Merwin Street. SCGC has low-pressure facilities that serve the residential areas located west of Redlands Boulevard and southwest of Merwin Street and Bay Avenue.

Throughout the proposed WLC project area, there are existing high-pressure natural gas transmission mains ranging in diameters of 16 inches up to 36 inches. SCGC currently maintains two 30-inch diameter transmission pipelines traversing the project site that run in an east-west direction and are located north and south of Alessandro Boulevard. There are also three transmission pipelines (a 16-inch, 30-inch, and 36-inch diameters) that run in a north-south direction along Virginia Street, south of Alessandro Boulevard. The 36-inch diameter pipeline also runs east from Virginia Street parallel with the 30-inch pipeline that runs south of Alessandro Boulevard.

Within the proposed WLC project site, SCGC maintains a gas line blow-down facility and flow metering station at Alessandro Boulevard and Virginia Street. Further south on Virginia Street, the San Diego Gas and Electric Company (SDG&E) maintains a natural gas compression station, known as the Moreno Compressor Station, which supplies gas to San Diego via 16-inch, 30-inch, and 36-inch transmission pipelines that continue to the south. SCGC has a gas transmission regulator station located at the southeast corner of Gilman Springs Road and Laurene Lane east of the proposed WLC project site.

Questar currently maintains a 16-inch gas transmission pipeline that underlies Alessandro Boulevard from Gilman Springs Road to Theodore Street, where it heads south to the Maltby Avenue alignment and then heads west toward Redlands Boulevard.

NOP/Scoping Comments. There were no specific comments regarding energy systems during the scoping process.

4.16.4.2 Existing Policies and Regulations

4.16.4.2.1 Federal Regulations

Energy Policy and Conservation Act. The Energy Policy and Conservation Act of 1975 sought to ensure that all vehicles sold in the U.S. would meet certain fuel economy goals. Through this Act, Congress established the first fuel economy standards for on-road motor vehicles in the U.S. Pursuant to the Act, the National Highway Traffic and Safety Administration (NHTSA), which is part of the U.S. Department of Transportation (USDOT), is responsible for establishing additional vehicle standards and for revising existing standards. Since 1990, the fuel economy standard for new passenger cars has been 27.5 mpg. Since 1996, the fuel economy standard for new light trucks (gross vehicle weight of 8,500 pounds or less) has been 20.7 mpg. The Corporate Average Fuel

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Economy (CAFE) program, administered by the EPA, was created to determine vehicle manufacturers' compliance with the fuel economy standards. The EPA calculates a CAFE value for each manufacturer based on city and highway fuel economy test results and vehicle sales. Based on the information generated under the CAFE program, the USDOT is authorized to assess penalties for noncompliance.

Energy Policy Act of 1992. The Energy Policy Act (EPA) of 1992 was passed to reduce the country's dependence on foreign petroleum and improve air quality. EPA includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. EPA requires certain Federal, State, and local governments and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPA. Federal tax deductions will be allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs.

Energy Policy Act of 2005. The Energy Policy Act of 2005 includes provisions for renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a Federal purchase requirement for renewable energy.

4.16.4.2.2 State Regulations

California Code of Regulations Title 24, Part 6. Enacted in 1978, this part of the California Code established energy efficiency standards for residential and nonresidential buildings in response to a legislative mandate to reduce California's energy consumption. These standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The most recent standards were adopted and went into effect January 1, 2010.¹ Such standards include the provision of cool roofs, demand control ventilation, skylights for day-lighting in buildings, thermal breaks for metal building roofs, and lighting power limits. These standards are expected to reduce the growth in electricity use of residential and non-residential buildings. Continual updates to Title 24 along with the State's implementation of AB 1493 and SB 1368 will have a major impact on the State's attainment of the AB 32 goals.

California Code of Regulations Title 24, Part 11. This part of the California Code is known as the California Green Building Standards Code (CALGreen Code) and was enacted to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts with positive environmental impacts and through encouragement of sustainable construction practices. The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). This update to Part 11 of Title 24 of the California Code of Regulations was effective January 1, 2011.

California Code of Regulations Titles 14 and 27. These parts of the California Code require energy efficient practices as part of solid and hazardous waste handling and disposal.

¹ *Nonresidential Compliance Manual for California's 2008 Energy Efficiency Standards*, California Energy Commission, effective January 1, 2010, <http://www.energy.ca.gov/title24/2008standards/index.html>, website accessed on March 4, 2010.

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Table 4.16.I: Electrical Demand and Consumption

Land Use Type	% of Total Square Footage	Building Area (sf)	Electrical Demand Factor (w/sf) ¹	Electrical Demand (MW)	Electrical Consumption (MWh/Yr) ²
Logistics (including offices)	100	40.6 million	1.68	68.2	376,426.3
Total	100	40,600,000	—	68.2	376,426.3

¹ Electric demand factors based on electric utility demand information from Moreno Valley Electric Utility

² Assumes a 63% load factor for all use types. Assumes Logistics and Office Space will operate 24 hours per day 7 days per week or 8,760 hours per year.

sf = square feet, w = watts, MW = Megawatts MWh = megawatt-hours

Source: Technical Memorandum – Dry Utilities, Utility Specialists, October 24, 2013.

Table 4.16.J: Natural Gas Demand and Consumption

Land Use Type	% of Total Square Footage	Building Area (sf)	Natural Gas Consumption Factor (cf/yr/sf) ¹	Natural Gas Consumption (cf/yr)
Logistics	97	39,382,000	—	—
Office Space	3	1,218,000	12.00	14,616,000
Total	100	40,600,000	—	14,616,000

cf = cubic feet.

Source: Technical Memorandum – Dry Utilities, Utility Specialists, October 24, 2013.

The WLC Specific Plan requires future installation of solar photovoltaic panels on the roof of each warehouse building to offset the energy demands of the office portion of the building. The following utility improvements are based on a “worst-case” assumption that on-site solar electrical generation is not available and electrical service would have to be provided by MVEU. In addition, partial or complete connection to the existing electrical grid may be necessary even with roof-mounted solar photovoltaic panels so there is redundancy (backup) in case of an emergency or during nighttime when no on-site power is being generated (i.e., some warehouses may operate 24/7). At this time, it is not anticipated that any uses will install sufficient on-site power generation and storage to be totally independent of the existing electrical grid.

A number of SCE facilities would still require relocation and expansion of MVEU facilities in order to provide network backup (i.e., if the solar generation equipment were to fail) and accommodate the potential increase in electrical demand no matter the contribution of project alternative energy generated. Power poles, guy poles, and guy anchors for the existing overhead 115 kV line along Theodore Street and Gilman Springs Road will need to be relocated at the time these roadways are widened. The portion of the existing 115 kV line along Eucalyptus Avenue may also need to be relocated into the new Eucalyptus Avenue alignment between Theodore Street and Gilman Springs Road at the time the roadway is constructed. The existing 115 kV line along Brodiaea Avenue may be able to be protected in place except for a few hundred feet where the transmission line intersects with the new Merwin Street, which will need to be relocated to accommodate street and storm drain channel improvements.

The existing 12 kV overhead power distribution lines along Redlands Boulevard will need to be undergrounded when the roadway is developed to its ultimate width. The existing 12 kV overhead power feeder lines located along Theodore Street and Alessandro Boulevard will need to be relocated and undergrounded as these roadway improvements take place during the development of the proposed WLC project. The existing 12 kV overhead power feeder line running south along Virginia Street to the Moreno Compressor Station (planned as Open Space) will be protected in place. The existing overhead service lines from the Theodore Street 12 kV line along Dracaea Avenue to the east and along Cottonwood Avenue to the west can be abandoned when existing on-site residences served by these facilities are abandoned. Per SCE requirements, SCE 12 kV undergrounded lines

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cannot be in a common trench with MVEU facilities and require a separate underground facility with a minimum 6 feet from other utility lines.

Based on the *Technical Memorandum – Dry Utilities World Logistics Center, Moreno Valley, CA*, (Utility Specialists, October 24, 2013) prepared for the proposed WLC project, construction of the first three logistics buildings that would occur during the initial phase of construction can be served by the existing MVEU substation at Cottonwood Avenue and Moreno Beach Drive, as long as capacity is still available at that station. Subsequent buildings in Phase 1 of construction will require the expansion of this substation. The expansion that would occur to meet this demand would be the addition of two new 28 MW transformer units which can be accommodated within the existing substation property. New 12 kV underground feeder circuits, including trenching, conduit, electrical vaults, and conductors will need to be installed from the substation to the proposed WLC project site. These improvements will occur along Cottonwood Avenue, along Moreno Beach Drive, and along Alessandro Boulevard, Brodiaea Avenue, and Cactus Avenue. These improvements are expected to take place concurrently with roadway construction.

To meet the proposed WLC project's ultimate annual demand of 376,426 MW, a new 112 MW substation will be constructed within the project limits at a central location near one of SCE's 115 kV transmission lines that will feed power to the substation. The *Dry Utilities* memo for the project indicates two potential locations; the first adjacent to the SCE transmission lines along Gilman Springs Road, and the other adjacent to the SCE transmission lines along Brodiaea Avenue. Impacts of constructing the new station at either of these on-site locations may be the same.

SCE will require approximately 2 acres for a switching station near the new 112 kV substation proposed by MVEU to serve the proposed WLC project. All MVEU primary distribution conductors within the project will be installed within underground conduits and vaults within the public roadway rights-of-way or within easements as a joint trench with telephone, cable television, and natural gas. Since the installation or relocation of electrical facilities would take place concurrently with roadway construction and/or within dedicated easements, or protected in place, the construction of these facilities would not result in significant environmental effects. Previously referenced Figure 3.16 depicts the proposed electrical facilities assuming 100 percent backup electrical service to the WLC site.

SCGC has indicated that the existing 4-inch medium-pressure line underlying Redlands Boulevard and Cactus Avenue can be extended into and looped around the proposed WLC project roadway alignments to serve the proposed development. New two-inch gas lines will also be installed to accommodate the proposed WLC project's demand. No gas lines will be installed on Gilman Springs Road since all buildings will be served from the interior gas lines. Natural gas facilities will be installed in the public street rights-of-way and easements as a joint trench with telephone, cable TV and electrical services. The gas main in Eucalyptus Avenue will be on the south side of the street and in its own trench as it was not included in the common trench installed to serve the Skechers building.

Relocation of natural gas transmission lines within the proposed WLC project into public street rights-of-way and easements will be necessary to support site development and grading. These include 11,100 feet of the 30-inch gas pipeline in Cottonwood Avenue from Redlands Boulevard to Theodore Street and then southeast to Virginia Street and Alessandro Road intersection; 1,900 feet of 30-inch gas line from Gilman Springs Road at Lisa Lane southwest to Alessandro Boulevard; 1,000 feet of 16-inch gas line owned by Questar from Gilman Springs Road southwest to Alessandro Road and 4,000 feet of 16-inch gas line owned by Questar on the Maltby Avenue alignment from Merwin Street to Theodore Street. The remaining transmission gas lines are anticipated to be protected in place within the proposed streets or easements between buildings. The regulator station located at the southeast corner of Gilman Springs Road and Laurene Lane east of the proposed WLC project will need to be relocated as part of the widening of this road. The gas facility on Alessandro Boulevard

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and Virginia Street will remain in place as the project develops in this area. The SDG&E natural gas compression station on Virginia Street south of the project site, known as the Moreno Compressor Station, along with a smaller facility on Virginia Street at Boadicea Avenue will be protected in place. Since the installation or relocation of natural gas facilities would take place concurrently with roadway construction and or within dedicated easements, or protected in place, the construction of these facilities would not result in significant environmental effects. Previously referenced Figure 3.16 depicts the proposed natural gas facilities.

The supply of natural gas and electricity is demand-responsive. The project proponent would be required to meet the service requirements of these utility providers, which would ensure that a less than significant impact related to the provision of power would result from development of the proposed logistics uses.

Additionally, the proposed WLC project would be required to adhere to Title 24, Part 6, of the California Code of Regulations, which identifies energy efficiency standards for residential and nonresidential buildings. These standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The most recent standards were adopted and went into effect January 1, 2011. The 2011 standards for residential and non-residential buildings are expected to reduce the growth in electricity use and reduce the growth in natural gas use. Such standards include the provision of cool roofs, demand control ventilation, skylights for day-lighting in buildings, thermal breaks for metal building roofs and lighting power limits.

Specific Plan Design Features. As noted in Section 3.5.9.1 of the Project Description, the project intends to achieve applicable elements of certification from the U.S. Green Building Council Leadership in Energy and Environmental Design (LEED), and encourages LEED Certification. The project will encourage sophisticated construction techniques that will provide pollution prevention and control such as noise, air quality, erosion and sediment controls. Both site planning and future building design will encourage current best practices for use of recycled materials and products, such as recycled steel, and crushed concrete and pavement materials. The use low-emitting VOC building materials will be used on site.

Compliance with such standards would be reviewed before the issuance of a building permit by the City. Because the proposed WLC project would be required to adhere to standards contained in Title 24 in addition to requirements set forth by the respective utility providers, development of the proposed WLC project would not result in the wasteful, inefficient or unnecessary consumption of energy.

NOTE: The following addition is in response to Comment F-13-32 in Letter F-13 from the Sierra Club et al.

The WLCSP will require extensive energy conservation measures, solar energy systems, and underground utilities to be installed on future development. In these ways, the WLC project is consistent with General Plan Objective 7.5 and Policies 7.5.1, 7.5.5, and 7.7.2.

NOTE: The following measures include many of the mitigation recommendations in Comment E-2A-25 in Letter E-2A from the City of Riverside.

Mitigation Measures. Even with implementation of the WLCSP design measures regarding energy conservation, the following specific measures are recommended to help ensure that potential impacts of the WLC project relative to energy use will remain at less than significant levels:

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4.16.4.6.1A Each application for a building permit shall include energy calculations to demonstrate compliance with the California Energy Efficiency Standards confirming that each new structure meets applicable Building and Energy Efficiency Standards. The plans shall also ensure that buildings are in conformance with the State Energy Conservation Efficiency Standards for Nonresidential buildings (Title 24, Part 6, Article 2, California Administrative Code). This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions. Plans shall show the following:

- Energy-efficient roofing systems, such as “cool” roofs, that reduce roof temperatures significantly during the summer and therefore reduce the energy requirement for air conditioning.
- Cool pavement materials such as lighter-colored pavement materials, porous materials, or permeable or porous pavement, for all roadways and walkways not within the public right-of-way, to minimize the absorption of solar heat and subsequent transfer of heat to its surrounding environment.
- Energy-efficient appliances that achieve the 2008 Appliance Energy Efficiency Standards (e.g., EnergyStar Appliances) and use of sunlight-filtering window coatings or double-paned windows.

4.16.4.6.1B Prior to the issuance of any building permits within the World Logistics Center Specific Plan, each project developer shall submit energy calculations used to demonstrate compliance with the performance approach to the California Energy Efficiency Standards to the Building and Safety and Planning Divisions that shows each new structure meets the applicable Building and Energy Efficiency Standards. Plans may include but are not necessarily limited to implementing the following as appropriate:

- High-efficiency air-conditioning with electronic management system (computer) control.
- Variable Air Volume air distribution.
- Outside air (100 percent) economizer cycle.
- Staged compressors or variable speed drives to flow varying thermal loads.
- Isolated High-efficiency air-conditioning zone control by floors/separable activity areas.
- Specification of premium-efficiency electric motors (i.e., compressor motors, air handling units, and fan-coil units).
- Use of occupancy sensors in appropriate spaces.
- Use of compact fluorescent lamps in place of incandescent lamps.
- Use of cold cathode fluorescent lamps.
- Use of Energy Star exit lighting or exit signage.
- Use of T-8 lamps and electronic ballasts where applications of standard fluorescent fixtures are identified.
- Use of lighting power controllers in association with metal-halide or high-pressure sodium (high intensity discharge) lamps for outdoor lighting and parking lots.
- Use of skylights (may conflict with installation of solar panels in some instances).

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- Consideration of thermal energy storage air conditioning for spaces or hotel buildings, meeting facilities, theaters, or other intermittent-use spaces or facilities that may require air-conditioning during summer, day-peak periods.

4.16.4.6.1C Prior to the issuance of a building permit, new development shall demonstrate that each building has implemented the following:

- 1) Install solar panels with a capacity equal to the peak daily demand for the ancillary office uses in each warehouse building;
- 2) Increase efficiency for buildings by implementing either 10 percent over the 2008 Title 24's energy saving requirements or the Title 24 requirements in place at the time the building permit is approved, whichever is more strict; and
- 3) Require the equivalent of "Leadership in Energy and Environmental Design Certified" for the buildings constructed at the World Logistics Center based on Leadership in Energy and Environmental Design Certified standards in effect at the time of project approval.

This measure shall be implemented to the satisfaction of the Building and Safety and Planning Divisions.

4.16.4.7 Cumulative Impacts to Energy Facilities

As indicated in Section 4.16.4.6.1, the proposed WLC project would not result in significant impacts related to energy consumption with implementation of the WLC Specific Plan as proposed, and with the recommended project-specific mitigation measures. The project will adhere to Title 24, Part 6, of the CCR, which identifies state energy efficiency standards. Adherence to these energy efficiency standards would reduce the amount of energy consumed by the proposed WLC project. The WLCSP will require future development to install solar photovoltaic panels on the roof of each building to meet the electrical demand of the office portion of each warehouse building. The proposed WLC project will implement "green building" characteristics and its design will help reduce energy consumption. With these measures, the WLC project will not make a significant contribution to cumulative energy facility impacts.

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NOTE TO READERS. Revisions have been made to this section to reflect changes in Programmatic DEIR Sections 2 through 4 in response to comments on the DEIR and as a result of changes in the WLC project.

5.0 OTHER CEQA TOPICS

Section 15126 of the *CEQA Guidelines* requires that all aspects of a project must be considered when evaluating its impacts on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify (1) significant environmental effects of the proposed WLC project; (2) significant environmental effects that cannot be avoided if the proposed WLC project is implemented; and (3) growth-inducing impacts.

5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED WLC PROJECT IS IMPLEMENTED

Table 5.A illustrates the significant unavoidable impacts anticipated to result from the proposed WLC project, even with implementation of the project-specific mitigation measures identified in the Section 4.0 analyses.

Table 5.A: Significant Environmental Effects Which Cannot Be Avoided

Topic	Type of Impact	Impact
Aesthetics	Scenic Vistas	The DEIR originally indicated no feasible mitigation was available to mitigate for the direct impacts associated with the loss of existing viewsheds in the area. Mitigation was modified/added to help reduce these impacts.
Aesthetics	Scenic Resources and Scenic Highways	The DEIR originally indicated no feasible mitigation was available to mitigate the changes to existing viewsheds from SR-60 and from Gilman Springs Road, both considered local scenic roads by the City. Mitigation was modified/added to help reduce these impacts. With this mitigation, these impacts are consistent with relevant General Plan policies regarding views.
Aesthetics	Substantial degradation of the existing visual character or quality of the site and its surroundings	The DEIR originally indicated no feasible mitigation was available to mitigate for the direct impacts associated with the substantial change in visual character from agriculture to high cube warehouse uses with building heights of 60 to 80 feet. Mitigation was modified/added to help reduce these impacts.
Aesthetics	Cumulative Aesthetic Impacts	The cumulative effect of development in the region will continue to result in the modification of existing viewsheds especially along SR-60. Construction of the proposed WLC project, in conjunction with other planned development, would contribute to the obstruction of existing views. Even with the revised mitigation measures, the project's cumulative impact will not be reduced to a less than significant level.
Air Quality	Construction Air Pollutant Emissions	Construction activities would result in exceedance of SCAQMD threshold for VOC, CO, NO _x , PM ₁₀ , and PM _{2.5} . Even after application of mitigation measures, estimated air pollutant emissions during construction activities would remain significant and unavoidable for NO _x , and PM ₁₀ and localized PM ₁₀ concentrations.
Air Quality	Operational Air Pollutant Emissions	No feasible mitigation is available. Estimated air pollutant emissions during operation of the project will remain significant

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Table 5.A: Significant Environmental Effects Which Cannot Be Avoided

Topic	Type of Impact	Impact
		and unavoidable for VOC, CO, NO _x , PM ₁₀ , and PM _{2.5} and localized PM ₁₀ concentrations.
Air Quality	Consistency with Air Quality Management Plan (AQMP)	The project will produce significant amounts of air pollutants on a daily and cumulative basis, both during construction and operation. Even with implementation of proposed mitigation, emissions will result in exceedances that are not consistent with implementation of the current AQMP.
Air Quality	Cumulative Air Pollutant Emissions	The Basin is in nonattainment for PM ₁₀ and ozone at the present time. Construction of the proposed WLC project, in conjunction with other planned developments within the cumulative study area, would contribute to the existing nonattainment status. Therefore, the proposed WLC project would exacerbate nonattainment of air quality standards within the SCAQMD and contribute to adverse cumulative air quality impacts.
Air Quality	Sensitive Receptors	Residents inside the project boundary could be exposed to significant short-term and long-term PM ₁₀ concentrations on an ongoing basis. The health effects from short-term PM exposure include irritation of the eyes, nose, throat; coughing, and chest tightness; and aggravation of existing lung diseases. Long-term exposure can reduce lung functions; chronic bronchitis; changes in lung morphology; and/or death. Even with mitigation measures air quality impacts from the project will be significant and unavoidable.
NOTE: Climate change was removed as a cumulative impact because the project can take credit for regional GHG emission reductions from the State's cap-and-trade program involving refineries and diesel truck fuel.		
Land Use and Planning	Divide an existing neighborhood (impacts on existing residences)	The site contains seven rural residences that cannot be effectively buffered against the impacts of adjacent warehouse buildings and operations (i.e., air pollution and health risks). Mitigation was added to help reduce noise, dust and other air pollutant-related impacts on the rural residences.
Noise	Short-Term Construction Noise	Project construction will create significant noise levels for on-site uses and off site away from the project site due to construction vehicle travel.
Noise	Long-Term Traffic Noise	Residential land uses along a number of local roadways will experience noise levels that are projected to exceed City standards from project-related traffic. Potential noise attenuation improvements may not be physically or economically feasible due to building and roadway constraints.
Noise	Cumulative Noise Levels	Noise from project-related traffic and cumulative development will eventually exceed City noise standards and the project will make a substantial contribution to that cumulative impact.
Transportation	Off-Site Impacts to TUMF Facilities	<p>These are impacts requiring improvements and changes to roads that are part of the TUMF Regional System of Highways and Arterials, some of which are under the jurisdiction of Moreno Valley and others are located in other jurisdictions. The developer shall be responsible for paying the TUMF fees in effect at the time of approval. These payments shall constitute the developer's mitigation of project impacts to this category of roads.</p> <p>The City shall work with the other member agencies of WRCOG to program TUMF funds to implement the mitigation measures identified in 4.15.AT through 4.15.AY pertaining to TUMF facilities outside the jurisdiction of the City of Moreno Valley. To the extent</p>

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Table 5.A: Significant Environmental Effects Which Cannot Be Avoided

Topic	Type of Impact	Impact
		that TUMF fees provided by the developer are used to implement the recommended improvements the project's impacts would be less-than-significant. However, because the City does not have direct control over TUMF funding the City cannot ensure that the identified improvements would be made. The project's impacts on these facilities must be considered significant and unavoidable.
Transportation	Off-Site Improvements to Roads Outside the Jurisdiction of the City and Not Part of the TUMF Program	<p>These are impacts requiring improvements to transportation facilities that are under the jurisdiction of Riverside County, Caltrans, and other municipalities and that are not included in the TUMF Regional System of Highways and Arterials.</p> <p>The City does not have cooperative agreements with neighboring jurisdictions that would serve as a mechanism for collecting and distributing developer funds to cover the cost of cross-jurisdictions mitigation measures, other than the TUMF program. To the extent that the City is able to establish such a mechanism and the other jurisdiction constructs the recommended improvement, the project's impacts would be less-than-significant. However, because the City cannot guarantee that such a mechanism will be established and does not have direct control over facilities outside of its jurisdiction the City cannot ensure that the identified improvements would be made. The project's impacts on these facilities must be considered significant and unavoidable.</p> <p>Similarly, the City has not entered into an agreement with Caltrans for the collection of developer funds for improvements to the state highway system other than freeway interchange improvements funded through the TUMF program. Nor has Caltrans established a program to collect fair-share contributions to freeway improvements such as those identified in EIR Tables 4.15.AX and 4.15.BA (TIA tables 40 and 68). The City shall work with Caltrans to establish a mechanism for collecting funds from developers for use in funding needed freeway improvements. However, since at the present time no such mechanism exists that would ensure that WLC funds contributed to Caltrans or any other state agency would be used to implement specific improvements that mitigate WLC impacts, and there is no mechanism by which the City can construct or guarantee the construction of any improvements to the freeway system by itself, the project's impacts on the state highway system must be considered significant and unavoidable.</p>

1 The DEIR originally indicated there was no mechanism for the mitigation of impacts to the loss of 25 acres of Unique Farmland and/or existing agricultural operations. The acquisition of an offsite agricultural conservation easement was added as mitigation which will reduce the project's impact to State Designated Farmland to a less than significant level.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

Section 15126(c) of the *CEQA Guidelines* mandates that the EIR must address any significant irreversible environmental changes which would be involved in the proposed action should it be implemented. An impact would fall into this category if it resulted in any of the following:

1. The project would involve a large commitment of non-renewable resources;

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2. The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
3. The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and/or
4. The project will consume large amounts of energy that are produced from non-renewable fossil fuels, although the WLC Specific Plan indicates the proposed uses will efficiently consume energy and water resources.

Determining whether the proposed WLC project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The project site is generally marginal agricultural land; however, as identified within the City's General Plan, the City anticipates the eventual conversion of agricultural uses to urban uses and the proposed WLC project would permanently alter the site by converting predominantly agricultural uses to urban warehousing. This is a significant irreversible environmental change that would occur as a result of project implementation. Because no significant mineral resources were identified within the project limits, no significant impacts related to this issue would result from development of the project site. Natural resources in the form of construction materials would be utilized in the construction of the proposed WLC project and energy resources in the form of electricity and natural gas would be used during the long-term operation of the project; however, their use is not expected to result in a negative impact related to the availability of these resources. Existing scenic vistas were identified as being visible from the project limits. Implementation of the proposed WLC project would result in the obstruction of views of the Badlands, Mt. Russell and Mystic Lake/San Jacinto Wildlife Preserve from the nearest sensitive visual receptors and those traveling along roadways in the project vicinity. This is a significant and irreversible environmental change that would occur as a result of project implementation. Cumulatively, future development along SR-60 would also result in the obstruction of the existing views of surrounding mountains and visual features.

In addition, this logistics warehouse project, in concert with the other built or approved industrial warehouse projects to the north and west, will fundamentally change the character and land use pattern of this portion of the City. Many of the project-specific impacts are addressed, as outlined above, but the land use change represented by this and other industrial projects represents a substantial irreversible change in community character for this area.

5.3 GROWTH-INDUCING IMPACTS

The project area is largely vacant undeveloped land, although there are seven existing single-family homes in various locations on the proposed WLC project site along with associated ranch/farm buildings. The site has been farmed since the early 1900s and has supported dry (non-irrigated) farming, livestock grazing, and limited citrus groves. Much of the site continues to be used for dry farming.

The northern side of the proposed WLC project site abuts SR-60 and the eastern side abuts Gilman Hot Springs Road. Additionally, the southwestern portion of the project site is adjacent to existing single-family residential uses at the intersection of Redlands Boulevard and Alessandro Boulevard. With implementation of the General Plan Amendment and new Specific Plan, the project has the potential to induce or create conditions that would accelerate development of vacant parcels in the surrounding area from the creation of new employment opportunities and increasing the demand for goods and services.

The following changes have been made due to revision to the Specific Plan project size.

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The City's population has grown steadily over the past decades. Population projections developed by SCAG estimate the City's population will reach approximately 213,700 persons by the year 2020 and approximately 255,200 persons by the year 2035. The extent to which the new jobs created by a project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a project. Construction of the proposed WLC project will create short-term construction jobs. These short-term positions are anticipated to be filled by workers who, for the most part, reside in the project area; therefore, construction of the proposed WLC project will not generate a permanent increase in population within the project area. Development envisioned under the proposed Specific Plan consists of approximately 40.6 million square feet of logistics warehouse and general warehouse facilities.

Development of the proposed high-cube logistics warehouse and general warehouse facilities will create jobs in the local economy. It is estimated that the WLCSP project would result in approximately 27,684 new job opportunities (20,300 on-site jobs plus 7,384 direct/induced jobs). The new employment opportunities resulting from development of the proposed high-cube logistics warehouse and general warehouse uses will raise the City's current jobs-to-housing ratio by providing additional jobs to local residents. While the place of residence of the persons accepting employment provided by the proposed uses is uncertain, due to the City's projected jobs/housing ratio, it is reasonable to assume that a large percentage of these jobs would be filled by persons already living within the City or project area. The project does not include a residential component. The proposed WLC project is located within an area that is currently largely vacant and planned for mix of residential, commercial, business park, and open space land uses in accordance with the General Plan Community Development Element. The proposed WLC project includes a General Plan Amendment to change the existing mix of land use designations to Logistics Development and Light Logistics. Therefore, no significant increase in population of the City would result from the development or operation of the proposed WLC project.

The *Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California* ("Study," DTA 2013) estimates that approximately 7,384 indirect/induced jobs will be created in the County, of which 3,692 jobs are projected to be within the City as a result of project implementation. While the specific location of the potential additional indirect/induced jobs created within the County cannot be specifically determined, it is reasonable to assume that a large percentage of these jobs will be support service jobs and are likely to be located in the proposed WLC project vicinity, and therefore the City. As detailed in the Study, total recurring revenues available to the City are estimated at approximately \$11,272,323 per year. The greatest percentage of revenue is attributed to the Property Tax In-Lieu of Vehicle License Fee (40.1%), followed by Secured Property Tax (29.1%), and Business Receipts Tax and Licenses (10.7%). Total recurring costs to the City are estimated at approximately \$5,473,736 per year. The greatest percentage of cost is attributed to the Police Services (36.4%), followed by Infrastructure and Parks Maintenance Costs (33.2%), and Fire Services (13.5%).

Project recurring annual fiscal surplus that would be available to the City is estimated at \$5,798,587 which is equal to 2.06 times the project annual City General Fund costs.

The following changes have been made due to revision to the Specific Plan project size.

The project proposes to eliminate the potential for 7,700 units of residential housing planned under the Moreno Highlands Specific Plan, although this anticipated change is already included in the City's current Housing Element which has been certified by HCD. This change would incrementally reduce the population and housing growth potential for this property from that projected in the current SCAG regional growth forecast. However, the project would add 40.6 million square feet of logistics warehouse space in the eastern portion of the City. Since the City currently has a jobs-to-housing ratio substantially lower than the region (i.e., SCAG region), it is likely that much of the employment that would be generated by this project can be accommodated by the existing workforce in the City

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and surrounding area. In that way, the project is growth-inducing in terms of employment. Due to relatively high vacancy rates in the City, it is also likely that the housing needs of new employees that do not already live in the City (i.e., own or rent) could largely be accommodated by the City's existing housing stock. Therefore, the proposed WLC project would only produce modest (i.e., not significant) growth inducement within Moreno Valley.

As previously noted, the specific location of the additional indirect jobs created within the County cannot be specifically determined; however, it is likely that some percentage of these jobs will be support service jobs and are likely to be located in the project vicinity. The Study assumes that one-half of these indirect jobs will be located within the City. The Study indicates that the creation of new jobs to the City will lead to more consumer spending by employees in existing retail establishments within the City, as well as new retail development that will be attracted to the City as a result of this spending. Job creation also results in increased tax revenues to the City through increased property taxes and sales taxes associated with development of the proposed WLC project. However, it is important to note that because of the difference in timing of the development of the various phases of the proposed WLC project, the number of employees summarized above will not be realized at the same time.

Development of the proposed WLC project is projected to create approximately 16,521 construction-related jobs within the City. Similar to recurring employment (i.e., permanent), it is likely that a large percentage of these jobs will be located in the general vicinity of the proposed WLC project and therefore within the City.

The proposed WLC project does not include a residential component; therefore, the jobs generated by the proposed WLC project would not need to support new households as a result of direct employment or indirect employment. Based on the potential increase in jobs (additional 20,300 direct jobs) within the City and no substantial increase in population as a result of the project, the City's jobs-to-housing ratio would improve from the existing (2011) ratio of 0.45 to 0.88, thus achieving a greater jobs-to-housing balance within the City. As development of the proposed WLC project is expected to occur over the course of many years, the jobs-to-housing ratio will not be significantly changed immediately. The City's current jobs-to-housing ratio is exceptionally low when compared to SCAG standards; therefore, the need for employment is immediate. A balance between jobs and housing within the City would have a positive impact by decreasing costs associated with commuting, traffic congestion, air pollution, and improves the standard of living. It also provides savings and a better quality of life to consumers in the operation and maintenance of automobiles, lessening commute times and saving to local public agencies in terms of the need to construct and maintain new road improvements.

Streets, water and sewer utilities, and municipal services would be extended to serve the proposed WLC project. The proposed WLC project will benefit other development projects in the project area, and therefore, could potentially induce additional business and job growth by removing an impediment to growth, such as a lack of basic infrastructure or services. However, the proposed WLC project is located proximate to other existing warehouse, commercial, and residential uses. Therefore, the project will necessitate extension of major infrastructure, however, the project will not result in substantial population growth that has not already been planned for in the City's General Plan. As the type and intensity of use proposed for the project site would be consistent once implementation of the General Plan Amendment and Zone Change take place, and because the improvements necessary for development of the site would not facilitate growth that has not been anticipated in the project area, no significant growth-inducing effect would occur, and no mitigation is required.

5.4 URBAN DECAY

A detailed analysis of potential employment and fiscal impacts of the project is provided in Section 4.13, *Population, Housing, and Employment*. This analysis concludes the proposed project is not expected to cause or contribute to any conditions of urban decay within the City of Moreno Valley.

5.5 ENERGY CONSUMPTION

A detailed analysis of energy consumption, according to Appendix F of the *CEQA Guidelines*, is included in Section 4.16, *Utilities and Service Systems*.

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NOTE TO READERS. *This section has been revised based on changes to the WLC Specific Plan and in response to comments on the Programmatic DEIR, mainly taking out the CDFW Conservation Buffer Area in the No Project/General Plan Alternative.*¹

6.0 ALTERNATIVES TO THE PROPOSED PROJECT

6.1 INTRODUCTION

An EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment. In compliance with *CEQA Guidelines* Section 15126.6(a), this Draft EIR must also 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 but would avoid or substantially lessen any of the significant effects of the project.” The EIR need not consider every conceivable alternative; rather it must consider a reasonable range of potentially feasible alternatives to the project, or to the location of the project, which would avoid or substantially lessen significant effects of the project, even if “these alternatives would impede to some degree the attainment of the project objectives, or would be more costly” (*CEQA Guidelines* Section 15126.6(b)). The discussion of project alternatives must “include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” An EIR must evaluate a “No Project” alternative in order to allow decision-makers to compare the effect of approving the project to the effect of not approving the project.

The City of Moreno Valley (City), acting as the CEQA Lead Agency, is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives addressed in an EIR is governed by a “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Of the alternatives considered, the EIR need examine in detail only those the Lead Agency determines could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Per *CEQA Guidelines* Section 15364, “feasible” has been defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”

6.1.1 Summary of the Proposed Project

NOTE: The following changes have been made due to revisions to the Specific Plan project size.

The proposed World Logistics Center (WLC) project is generally located in the eastern portion of the City in northwestern Riverside County. The project site is immediately south of SR-60, between Redlands Boulevard and Gilman Springs Road (the easterly city limit), extending to the southerly city limit. Previously referenced Figure 1.1 in the *Executive Summary* depicts the location of the proposed project within the region and the City. The major roads that currently provide access to the project site are Redlands Boulevard, Theodore Street, Alessandro Boulevard, and Gilman Springs Road.

The overall project site covers 3,818 acres in the Rancho Belago area of the City of Moreno Valley. It includes 3,714 acres of land, which is the subject of various entitlements, plus 104 acres of land affected by off-site improvements needed to support the proposed development. The proposed entitlements are summarized below.

A General Plan Amendment is proposed covering 3,714 acres, which redesignates approximately 70 percent of the area (2,610 acres) for logistics warehousing (new LD and LL zones) and the remaining 30 percent (1,104 acres) for permanent open space and public facilities. The following elements of

¹ *Comment G-95-83 in Letter G-95 from Thomas Thornsley.*

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the General Plan are included in the proposed Amendment: Community Development (land use); Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and the General Plan Goals and Objectives.

A new Specific Plan (September 2014) will be adopted to govern development of the World Logistics Center for the 2,610 acres. A separate zoning amendment will also be processed and adopted to rezone 1,104 acres for open space and public facilities uses and to incorporate the Specific Plan into the City's Zoning Map.

In addition to the General Plan Amendment, Specific Plan, and Zone Change, the project includes a Tentative Parcel Map covering 1,539 acres (property owned by the project applicant, Highland Fairview) within the project site. This subdivision map is for financing purposes only and will not confer any development rights to the property owner.

The project includes pre-annexation zoning for an 85-acre parcel of land within the project area.

Finally, a Development Agreement between the City and Highland Fairview (the project applicant) is included as one of the project entitlements. The details of all the project entitlements are included in Section 3.4 of the EIR, *Project Characteristics*.

The land owned by the California Department of Fish and Wildlife (CDFW; formerly California Department of Fish and Game [CDFG]) immediately south of the WLC Specific Plan property is utilized for dry farming agriculture and forms the northern end of the San Jacinto Wildlife Area (SJWA). The SJWA contains a wide diversity of birds and other wildlife in and around Mystic Lake. The project proposes an amendment to the General Plan to designate this area as Open Space from its current residential and industrial land use designations.

6.1.2 Project Objectives

NOTE: The following changes have been made due to revisions to the Specific Plan project size.

The primary purposes of the proposed project are to 1) establish the 2,610-acre WLC Specific Plan land use designations and development standards that will direct the development of a world-class corporate park specifically designed to support the logistics warehouse and operational needs of large companies and corporate users; and 2) designate 1,084 acres of vacant land owned by the CDFW as Open Space in the City's General Plan to ensure the continued and intended purpose of the SJWA. The WLC Specific Plan outlines the following overall objectives for development proposed in the Specific Plan:

- Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.
- Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan.
- Create a major logistics center with good regional and freeway access.
- Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.
- Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly to accommodate the next-generation of logistics buildings.
- Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach.

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- Create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity.
- Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.
- Encourage new development consistent with regional and municipal service capabilities.
- Significantly improve the City's jobs/housing balance and help reduce unemployment within the City.
- Provide thousands of construction job opportunities during the project's buildout phase.
- Provide appropriate transitions between on-site and off-site uses.

6.1.3 Summary of Proposed Project Significant Impacts

NOTE: The following changes have been made to the project-related significant impacts due to the revised agricultural and air quality reports (refer to Sections 4.2 and 4.3 in this EIR).

The analysis provided in Section 4.0 determined that, despite the implementation of mitigation measures, significant environmental impacts would result from the construction and operation of the proposed project. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce any of the following project-related significant unavoidable impact(s):

- Aesthetics: Loss of views, scenic highways, and visual character;
- Air Quality: Short-term emissions of VOC, NO_x, CO, and PM₁₀ in excess of SCAQMD daily limits during construction and localized PM₁₀ concentrations;
- Air Quality: Long-term emissions of CO, VOC, NO_x, PM₁₀, and PM_{2.5} resulting from increased vehicular trips and operation of the proposed on-site uses and localized PM₁₀ concentrations;
- Air Quality: Inconsistent with AQMP due to change in land uses from existing General Plan;
- Air Quality: Short-term emissions from VOC, NO_x, CO, and PM₁₀ cumulatively exacerbating the nonattainment of air quality standards within the Basin.
- Air Quality: Long-term emissions of ozone, PM₁₀ and PM_{2.5} cumulatively exacerbating the nonattainment of air quality standards within the Basin.
- Land Use: Impacts to onsite residences from adjacent warehouse development;
- Noise: On-site and off-site levels of project-related traffic noise; and
- Transportation: Project contributions to cumulatively considerable impacts to various extra-territorial facilities, various TUMF facilities, and State-controlled transportation facilities.

6.2 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR DETAILED ANALYSIS

NOTE: The following changes have been made due to revisions to the Specific Plan project size.

In determining an appropriate range of alternatives to be evaluated in the EIR, three possible alternatives were considered and rejected because they could not accomplish the basic objectives of the project as listed above or they were considered infeasible. Per the *CEQA Guidelines* (Section 15126.6(c)), factors that may be considered when addressing the feasibility of alternatives include failure to meet most of the stated project objectives, infeasibility, or inability to avoid significant

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environmental effects. The purpose of the proposed project is to establish the 2,610-acre WLC Specific Plan that will result in the development of 40.6 million square feet of high-cube logistics warehouse uses and designation of 1,085 acres of vacant land owned by CDFW as Open Space. The proposed project would provide for and expand employment and revenue opportunities within the City.

The following development scenarios were considered and rejected as potential alternatives to implementation of the proposed project:

- All Residential Use Alternatives; and
- Mixed Use Alternatives that emphasize residential uses.

Based on Section 15126.6 of the *CEQA Guidelines*, these alternatives were rejected based on the criteria of not feasibly attaining most of the basic objectives of the project while reducing or avoiding any of the significant effects of the proposed project. The reason or reasons for not selecting each of the rejected alternatives are discussed below.

6.2.1 All Residential Uses¹

A number of residential uses, including very low density (2-acre or 5-acre lots) were considered prior to deciding on all warehousing uses, but it was concluded that any residential alternatives, or alternatives that emphasized residential uses, would further exacerbate the City's jobs/housing imbalance and did not meet any of the project goals. In addition, the City's Economic Strategy Plan excludes additional residential development in this area. For these reasons, all Residential Use Alternatives were rejected for further analysis. However, an evaluation of the largely residential Moreno Highlands Specific Plan (MHSP) was provided under the No Project/Existing General Plan alternative (see below).

6.2.2 Mixed Use Alternatives

The EIR examines two Mixed Use Alternatives with varying amounts of residential and non-residential uses. The No Project-Existing General Plan Alternative is based on the approved mixed use MHSP. In addition, Alternative 3 (Mixed Use B) evaluates the impacts of substituting logistics warehouse uses for the non-residential uses currently included in the MHSP. After extensive evaluation, it was concluded that any reasonable combination of residential and non-residential uses (i.e., light industrial, business park, office, commercial) would result in impacts similar to those of the MHSP, Alternative 2 (mixed non-residential uses but no residential uses), or Alternative 3 (Moreno Highlands Specific Plan with logistics warehousing as the main non-residential use). For this reason, no other Mixed Use Alternatives were considered further in this analysis.

6.3 ALTERNATIVES ANALYSIS

NOTE: Changes were made to the project alternatives as a result of the reduction in the proposed project site by 100-acres which resulted in reductions of land uses for certain alternatives as indicated below and shown in Tables 6.A and 6.B, as well as subtraction of 910 acres from the Moreno Highlands Specific Plan due to the purchase of land by the State for conservation purposes.

¹ Ones that are exclusively residential or ones that emphasize residential uses.

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6.3.1 Summary of Alternatives

The following alternatives have been identified and evaluated to provide decision-makers with a reasonable range of alternatives that would eliminate or reduce the impacts of the project. Factors considered in selecting the alternatives include site suitability, availability of infrastructure, other plans or regulatory limitations, economic viability, and whether the project proponent can reasonably acquire, control, or otherwise have access to the alternative site. An EIR need not consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote or speculative. In accordance with *CEQA Guidelines*, the alternatives considered in this EIR include those that 1) could accomplish most of the basic objectives of the project, 2) are reasonably feasible given the nature of the project and surrounding land uses, and 3) could avoid or substantially lessen one or more of the significant effects of the project. It should also be noted that alternatives proposed in the DEIR are theoretical and may never be developed even if approved. The following development scenarios have been identified as potential alternatives to implementation of the proposed project:

- No Project/No Build Alternative;
- No Project/Existing General Plan (modified Moreno Highlands Specific Plan);
- Alternative 1: Reduced Density (28 MSF or 30 percent less logistics warehousing);
- Alternative 2: Mixed Use A – Warehousing/Business Park/Office/Commercial;
- Alternative 3: Mixed Use B – MHSP with logistics warehousing; and
- Alternative Sites: Moving the project to some other available site.

Tables 6.A and 6.B summarize the alternatives. Table 6.C shows the current land use designations.

Table 6.A: Summary of Analyzed Alternatives

Project Alternative	Alternative Description
No Project/No Build (“baseline” conditions)	<i>The following changes have been made due to revision to the Specific Plan project size. The proposed WLC Specific Plan would not be developed with 2,610 acres proposed for high-cube logistics warehouse. No development would occur and the majority of the site would remain in dry farming, with a small amount in rural residential uses.</i>
No Project/Existing General Plan (modified Moreno Highlands Specific Plan)	The following changes have been made in response to comments on the DEIR. This alternative would result in development of the project with the land uses currently shown in the City’s General Plan which currently designates the project area as a mix of residential, commercial, business park, and open space land uses. The 3,038-acre Moreno Highlands Specific Plan (MHSP) is a master planned, mixed-use community that originally consisted of 7,763 residential units on approximately 2,435 acres and approximately 603 acres of business, retail, institutional, and other uses. During review of the DEIR, a comment was made that the MHSP could not be built as originally approved because since that time the State had purchased 1000 acres as a buffer for the San Jacinto Wildlife Area. Therefore, the portion of the MHSP that could be built today would consist of up to 4,051 residential dwelling units on approximately 709.3 acres and approximately 603 acres of business, retail, institutional, and other uses. In addition, the 1,085 acres owned by the CDFW are currently designated as Residential, Public Facilities, and Open Space in the City’s General Plan and would be designated as permanent Open Space under this alternative, similar to the proposed project.
Alternative 1 Reduced Density	<i>The following changes have been made due to revision to the Specific Plan project size. This alternative would develop approximately 28 million square feet of logistics warehousing (approximately 30% less than under the proposed project) on the 2,610 acres of land under the Specific Plan, including 74.3 acres for open space. The 1,085 acres owned by the CDFW would be designated as Open Space in the City’s General Plan, similar to the proposed project.</i>

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Table 6.A: Summary of Analyzed Alternatives

Project Alternative	Alternative Description
Alternative 2 Mixed Use A	This alternative would result in development of the entire property with a mix of 1,400 acres of logistics warehousing (22 million square feet), 1,000 acres of light manufacturing, assembly, or business park uses (20 million square feet), 50 acres of retail commercial uses (500,000 square feet), 100 acres of professional or medical office uses (1 million square feet), and 70 acres of open space. The 1,085 acres owned by the CDFW would be designated as Open Space in the City's General Plan, similar to the proposed project.
Alternative 3 Mixed Use B	This alternative would develop the project site similar to the land use plan of the MHSP but with 10 million square feet of logistics warehousing on the 603 acres proposed for business, retail, institutional, and other uses under the MHSP. The 1,085 acres owned by the CDFW would be designated as Open Space in the City's General Plan, similar to the proposed project.
Alternative Sites	This alternative would relocate development under the proposed project to another site of 2,610 acres in the surrounding region. This analysis included potential sites in nearby cities and several unincorporated sites in the general project area.

NOTE: The following changes to the table have been made due to revision to the Specific Plan project size.

Table 6.B: Alternatives to the World Logistics Center Specific Plan

Alternative	Logistics Warehousing	Light Industrial	Retail Commercial	Office	Other
Proposed Project	2,610 acres 40.6 MSF (100%) 0.28 FAR	0 acres 0 SF	0 acres 0 SF	0 acres 0 SF	74.3 acres Open Space
No Project/No Build (baseline)	0 acres 0 SF (0%)	0 acres 0 SF	0 acres 0 SF	0 acres 0 SF	2,610 acres Agriculture
No Project/Plan Modified Moreno Highlands Specific Plan ¹	0 acres 0 SF (0%)	361 acres (BP)	106.5 acres 1.1 MSF (various) 0.23 FAR	0 acres 0 SF	709.3 acres Residential 4,051 units 861 acres Open Space and Public Facilities
Alternative 1 Reduced Density	2,610 acres 28 MSF (70%) 0.25 FAR	0 acres 0 SF	0 acres 0 SF	0 acres 0 SF	74.3 acres Open Space
Alternative 2 Mixed Use A	1,400 acres 22 MSF (54%) 0.36 FAR	1,000 acres 20 MSF 0.46 FAR	50 acres 0.5 MSF 0.23 FAR	100 acres 1.0 MSF 0.23 FAR	70 acres Open Space
Alternative 3 Mixed Use B ²	603 acres 10 MSF (25%) 0.38 FAR	0 acres 0 SF	0 acres 0 SF	0 acres 0 SF	1,146 acres Residential 6,532 units 861 acres Open Space and Public Facilities
Alternative Sites	2,610 acres 40.6 MSF (100%) 0.28 FAR	0 acres 0 SF	0 acres 0 SF	0 acres 0 SF	0 acres 0 SF

FAR = Floor Area Ratio (gross) M = million SF = square feet MHSP = Moreno Highlands Specific Plan BP = business park

¹ See Table 6.C below ("Other" includes public facilities, cemetery, open space, etc.).

² Assumes residential land uses similar to MHSP but with logistics warehousing on land designated for non-residential uses ("Planned Business Center") under the Specific Plan.

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NOTE: the following table was revised in response to Comment G-95-83 in Letter G-95 from Thomas Thornsley.

Table 6.C: Moreno Highlands Specific Plan (Land Use Designations) modified table

Land Use	Original Acreage ¹	Modified Acreage ²
Residential Community		
Residential (dwelling units)	1,359.3 (7,763)	709.3 (4,051)
Parks and Open Space	701.9	352.0
Neighborhood Commercial	10.0	10.0
Cemetery	16.5	16.5
Public Facilities	347.7	347.7
Subtotal Residential	2,435.5	1,435.5
Planned Business Center		
Business Park	360.8	360.8
Mixed Use	80.5	80.5
Community Commercial	16.0	16.0
Parks and Open Space	77.9	168.7
State Conservation Land (SJWA)	0.0	910.0
Public Facilities	67.4	67.4
Subtotal Non-Residential	602.6	1,602.6
Project Total	3,038.0	3,038.0

1 MHSP adopted by City Council March 17, 1992.

2 Based on removal of 910 acres purchased by the State as a buffer for the San Jacinto Wildlife Area.

6.3.2 Environmental Impacts That Are Similar to the Proposed Project

Eight of the seventeen environmental issues for all the alternatives considered would result in a similar level of impact when compared to the project. Rather than repeat a discussion of these non-significant impacts under each alternative, a summary of these impacts is presented below.

- Agricultural Resources
- Biological Resources
- Hydrology and Water Quality
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral and Forestry Resources
- Public Services/Recreation

The level of impact associated with these topics would be similar if developed as proposed by the project or if developed with any of the alternatives. Where impacts related to any of these issues do differ among project alternatives, an appropriate discussion is provided for the respective alternative.

6.3.2.1 Agricultural and Forestry Resources

Development of any of the alternatives, with the exception of the Off-Site Alternative, would have similar agricultural-related impacts. The Moreno Valley General Plan policies and zoning designations support agriculture only as an interim use. No land in the City is designated solely for agricultural use or for agricultural preservation and no property within the City limits is located within a Williamson Act contract area. As such, no impacts related to Williamson Act land would occur with implementation of

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any of the alternatives. As identified in Sections 4.2.6.1 and 4.2.6.2 of the EIR, the development of the project site with urban uses would result in the conversion of State- and locally-designated Farmland (Unique Farmland and Farmland of Local Importance, respectively). With implementation of the revised mitigation, including acquisition of an offsite conservation easement for the loss of unique farmland, impacts to agricultural resources would be reduced to less than significant levels. Therefore, compared with the proposed project, all on-site alternatives would have less than significant impacts on agricultural resources.

There are no lands within the City of Moreno Valley designated as forest or forestland, according to the Fire and Resource Assessment Program mapping system maintained by the California Department of Forestry and Fire Protection. Therefore no impacts related to forestry resources would occur and no mitigation is required.

6.3.2.2 Biological Resources

All build alternatives would require site development resulting in the grading of the entire project site. According to the project biological report, the project area does not contain any wildlife movement corridors or linkages. The project biological report concluded that development of the project as proposed would not have any significant impact on wildlife movement in the area, and would not fragment habitat or adversely affect wildlife movement through the surrounding areas. Therefore, all on-site build alternatives would also similarly have a less than significant impact on wildlife movement and corridors.

Burrowing owl, a species of concern, was identified within the southern portion of in the WLCSP project site and offsite facilities during focused surveys conducted in 2013. Based on available research and expected site conditions, the project and all on-site alternatives may create potentially significant impacts on wildlife, including listed species, from diesel particulate emissions and toxic air contaminants related to truck exhaust (although somewhat reduced by prevailing winds), increased roadkill on Gilman Springs Road and new roadkill on future local streets close to the SJWA, and increased indirect impacts from additional lighting and noise. No federal or state endangered/species were detected on the project site during the focused biological resource surveys. However, it is likely that one or more endangered or threatened species or bird or other wildlife may be present on the SJWA property near the project site at various times of the year. With implementation of the recommended Mitigation Measures 4.4.6.1A through 4.4.6.1C, impacts to listed species will be reduced to less than significant levels for all on-site alternatives.

The project site is within the Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP) Fee Area, but is not within a Stephen's Kangaroo Rat Core Area. Focused surveys for SKR are not required for this project as it lies within the SKR Fee Area; therefore, under the SKR HCP, only payment of a local mitigation fee is required.

The project area is located within the Reche Canyon/Badlands Area of the MSHCP. Development of the project area would not conflict with the conservation goals established by the MSHCP for Cell Group X or Cell Group E. In addition, no conflict from development would occur in relation to the Reche Canyon/Badlands Area Plan, the Area Plan Subunit 4, the Area Plan Subunit 3, Proposed Core 3, or Existing Core H. No development is proposed within the portion of the project area that lies within Cell Group D and the SJWA. This area is already owned by the State and managed by the CFDW. However, development that will be adjacent to the SJWA property may cause significant indirect impacts to species within the SJWA, which will require mitigation (i.e., designing an appropriate buffer along this "urban edge" will help minimize potential impacts on the SJWA). The project is adjacent to the SJWA and is subject to the project guidelines provided in MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface). Development occurring on the project site is also required to adhere to the Best Management Practices (BMPs) found in Appendix C of the

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MSHCP. The project site is not located within any Amphibian, Mammalian, or Special Linkage Areas identified by the MSHCP. The project site is in an area requiring burrowing owl surveys, is within the MSHCP Criteria Area Species Survey Area (CASSA), and is within the Narrow Endemic Plant Species Survey Area (NEPSSA); however, surveys performed for the site confirmed such plants do not exist on the project site. From available information, potential indirect impacts to avian and other biological resources within Mystic Lake and the SJWA will be reduced to less than significant levels by the creation of a 250-foot on-site setback or buffer area in Mitigation Measure 4.4.6.1A, which will be in addition to the existing setback provided by the CDFW Conservation Buffer Area just south of the proposed development area.

The MSHCP and its Implementation Agreement contain a fee mitigation program pursuant to which local agencies collect development impact fees and remit such fees to the Riverside Conservation Authority (RCA). These fees are in turn used to acquire lands that are suitable for habitat preservation for species covered by the MSHCP. Payment of the local MSHCP mitigation fee will be required of the project and all on-site alternatives prior to the issuance of building permits. Participation in the MSHCP and contribution of MSHCP fees provides compensation for the loss of raptor foraging habitat due to approved projects. Typically, a project proponent would participate as outlined in the MSHCP, so that loss of raptor foraging habitat is typically considered to be less than significant and no mitigation is required.

The project is consistent with the major MSHCP requirements relative to core areas, criteria cells, threatened and endangered species. In addition, the project complies with the MSHCP guidelines for urban/interface, riparian/riverine areas, or related buffers (with implementation of Mitigation Measures 4.4.6.1A, 4.4.6.1B, 4.4.6.2A, and 4.4.6.2B). In addition, future development will be required to demonstrate that it is also consistent with all MSHCP requirements, including indirect impacts such as lighting, noise, and air pollution effects, which shall be implemented through adherence to Mitigation Measures 4.4.6.3A through 4.4.6.3C and 4.4.6.4A through 4.4.6.4J.

With implementation of Mitigation Measures 4.4.6.1A and 4.4.6.1B, 4.4.6.2A and 4.4.6.2B, 4.4.6.3A through 4.4.6.3C, and 4.4.6.4A through 4.4.6.4J, potential impacts related to MSHCP consistency will be reduced to less than significant levels for all on-site alternatives.

A formal jurisdictional delineation (JD) was conducted within the WLCSP and offsite facilities by MBA in September 2007 and again in March 2012. A total of 15 primary drainage features were identified during these combined surveys. The 2013 JD report concludes that two drainage features (Drainage 12 and 15) have been determined to be jurisdictional waters of the U.S. under Section 404 and 401 of the CWA. Drainages 7, 8, 9, 12, and 15 were determined to be waters of the state and subject to the jurisdiction of both the CDFW and RWQCB. A number of sub-drainages or tributaries were also identified. Implementation of Mitigation Measures 4.4.6.3A through 4.4.6.3C will ensure there will be no significant impacts to Waters of the U.S. or Waters of the State as a result of future development within the project.

One catch basin and portions of Drainage Feature 7 and 9 on the project site are considered riparian/areas, as defined by the MSHCP. If impacts to any of these areas cannot be avoided, a DBESP report and relevant mitigation will be required by the RCA for the project and all on-site alternatives. The project area does not contain habitat suitable for sensitive riparian species, such as least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. Additionally, no vernal pools or ephemeral ponds were observed on the project area and no suitable habitat for any fairy shrimp species was identified on site. The project area currently contains extensive raptor foraging habitat, which is considered a type of sensitive natural community. Impacts to the large amount of raptor foraging habitat is a significant impact that requires mitigation.

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The project may have a potentially significant indirect impact on Mystic Lake from diesel fuel emissions and nitrogen deposition. However, it is anticipated that indirect impacts from diesel fuel emissions and nitrogen deposition would be reduced under all other alternatives as each would result in a reduction in the number of diesel trucks and resultant diesel emissions.

With implementation of Mitigation Measures 4.4.6.1A and 4.4.6.1B, 4.4.6.2A and 4.4.6.2B, 4.4.6.3A through 4.4.6.3C, and 4.4.6.4A through 4.4.6.4J, potential impacts to riparian habitat or other sensitive natural communities, including on-site drainages, will be reduced to less than significant levels for all on-site alternatives.

No USFWS designated Critical Habitat for any species is located within the project area; therefore, no further action with regard to Critical Habitat is necessary. Extensive surveys were completed in 2005, 2010, 2012, and 2013 and concluded that Los Angeles pocket mouse was not present. However, to ensure that no impacts occur, Mitigation Measure 4.4.6.4E has been recommended.

For those species that are not covered by the take and incidental take provisions of the MSHCP (e.g., burrowing owl), the MSHCP requirements dictate that further protective action be taken. Burrowing owl, a species of concern, was identified within the southern portion of in the WLCSP project site and offsite facilities during focused surveys conducted in 2013. Because suitable habitat is present within the project area for the burrowing owl and because the species is highly mobile, a potential exists that, at some future date prior to project development, this species may occupy the development sites. This is a potentially significant impact requiring mitigation. Implementation of Mitigation Measures 4.4.6.4A through 4.4.6.4E would reduce impacts to burrowing owl and migratory bird species, and Los Angeles pocket mouse to less than significant levels for all on-site alternatives.

The only substantial differences among the built alternatives and the No Project/Existing General Plan (Moreno Highlands Specific Plan) is that any residential uses proximate to the San Jacinto Wildlife Area may incrementally increase adverse impacts by introducing domestic dogs and cats into the area that might prey on native wildlife.

6.3.2.3 Cultural Resources

Development of any of the identified build alternatives would result in extensive ground-disturbing activities affecting the entire project site, and similar cultural resource impacts would be anticipated when compared to the proposed project. There is no evidence to suggest that the project site has ever been utilized for human burials. In the unlikely event that human remains are discovered during grading or construction activities within the project site, compliance with State law (Health and Safety Code § 7050.5) (HSC § 7050.5) would be required. Compliance with existing State law would ensure that impacts related to the discovery of buried human remains would be less than significant and no mitigation is required. The *Cultural Resources Assessment* prepared for the proposed project concluded that it is possible that unknown cultural resources could be discovered during project-related construction. Adherence to Mitigation Measures 4.5.6.1A through 4.5.6.1E will reduce potential impacts to archaeological resources to less than significant levels for all on-site alternatives.

Mitigation Measure 4.5.6.1A requires surveying the seven occupied residential parcels for archaeological resources since these properties could not be surveyed at the time the EIR was prepared. These surveys will identify the potential for significant historical resources on these properties. In addition, Mitigation Measure 4.5.6.2A will further reduce the potential impacts of the project on historical resources for all on-site alternatives.

As described in the *Paleontological Resources Assessment*, no paleontological resources were observed during the field survey. However, the project site is considered to have a moderate paleontological sensitivity; therefore, impacts are considered potentially significant and mitigation is

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required. Adherence to Mitigation Measures 4.5.6.3A and 4.5.6.3B will reduce potential impacts to paleontological resources to less than significant levels for all on-site alternatives.

6.3.2.4 Geology and Soils

Development of any of the on-site build alternatives would have similar geologic and soil-related impacts. Although no active faulting was observed, some local discontinuous fracturing was observed and documented. The A-P Earthquake Fault Zone is located on the eastern border of the project site (refer to Figure 4.6.1 of the EIR). Adherence to Mitigation Measures 4.6.6.1A through 4.6.6.1C, as well as other requirements identified and required by the City, will ensure fault rupture hazards are reduced to a less than significant level for all on-site alternatives.

The level of potential ground motion is considered moderate to high in the City of Moreno Valley and, therefore, in the project area. In accordance with the City's General Plan Safety Element (Objective 6.1),¹ project development, as well as alternatives, will require geological and geotechnical investigations by State-licensed professionals. The geotechnical investigations will provide design considerations and earthwork recommendations to ensure that ground shaking impacts are appropriately mitigated. In addition, California Code of Regulations (CCR), Title 24, also known as the California Building Standards Code, contains building design and construction requirements relating to fire and life safety, and structural safety. The California Building Code (CBC) also includes standards designed to ensure that structures within California are built to withstand expected levels of seismic activity for each earthquake region throughout the State. Adherence to Mitigation Measure 4.6.6.2A, as well as other requirements identified and required by the City, will ensure ground shaking hazards are reduced to a less than significant level for all on-site alternatives.

On-site soils are identified as having a moderate to low shrink-swell potential. Implementation of Mitigation Measures 4.6.6.3A through 4.6.6.3D, and adherence to actions identified in subsequent geotechnical investigations, as well as other requirements identified and required by the City, will ensure that the potential impact from expansive soils are reduced to a less than significant level for all on-site alternatives.

NOTE: The following changes have been made due to revision to the Specific Plan project size.

A large older landslide has been mapped primarily off site on the northeasterly flanks of Mount Russell, near the southwest portion of the property. The landslide appears to have originated on the higher slopes off site and moved northeast, partially onto the subject property. The Specific Plan designates 74.3 acres in the southwestern portion of the property as open space. This 74.3 acres includes the steepest slopes on site (i.e., the Mount Russell foothills), which will reduce the potential for significant landslide or rockfall impacts on the project to less than significant levels; therefore, no mitigation is needed. Because this condition exists, it is anticipated that all other on-site alternatives would also restrict development within this area resulting in a less than significant impact, similar to the proposed project.

Development of the site would require the movement of on-site soils. Portions of the site have been and are being used for dry farming, and several rural residences are present. Prior to the issuance of grading permits, the project proponent will be required to prepare and submit detailed grading plans as each phase is developed. These plans will be prepared in conformance with applicable standards of the City's Grading Ordinance. Soils covering the project site have a slight-to-high erosion hazard potential and because the project would be required to adhere to the City's Grading Ordinance, obtain an NPDES Permit, prepare an SWPPP and a WQMP, construction and operational impacts

¹ Moreno Valley General Plan, Chapter 9 Goals and Objectives, pg. 9-30.

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associated with soil erosion hazards are considered to be less than significant for all on-site alternatives, and no mitigation is required.

Septic tanks would not be used under any of the on-site alternatives as existing sewer infrastructure is readily available to serve any on-site development.

None of the on-site alternatives propose any activity known to cause damage by subsidence (e.g., oil, gas, or groundwater extraction). The project site is underlain by relatively dense alluvial and dense sedimentary bedrock materials at depth and the potential for settlement is considered low. Because the project site does not exhibit characteristics of a high potential for subsidence or settlement, impacts are considered less than significant. No mitigation is required.

The potential for liquefaction generally occurs during strong ground shaking within relatively cohesionless loose sediments where the groundwater is typically less than 50 feet below the surface. Because the project site does not exhibit characteristics of a high potential for liquefaction induced settlement (i.e., relatively dense soils with groundwater levels in excess of 100 feet), impacts are considered less than significant for all on-site alternatives. No mitigation is required.

6.3.2.5 Hazards/Hazardous Materials

Development of the any of the on-site build alternatives would result in the on-site handling of hazardous substances, both during project construction and operation. It is assumed that, like any current use, these substances would continue to be used in accordance with applicable local, State, and Federal standards. There are no existing or proposed schools within a quarter mile of the proposed project site and the site is not identified on the DTSC's hazardous materials sites. Air traffic-related hazards would not occur at the proposed project site as it is not located within the safety hazard zones of March Air Reserve Base.

A portion of the project area is mapped as a very high fire hazard area, while the Badlands directly east of the project area are considered a High Fire Hazard Area.¹ Development of the eastern portion of the project could expose persons or property to wildland fire risks given the designation of a portion of the project area as a Very High Fire Hazard Area. Regardless of these designations, all new structures in the project area must be constructed in compliance with Title 24 of the California Code of Regulations to safeguard life and property from fire hazards, including the installation of automated fire suppression systems. Compliance with these standards would be enforced during building permit review and the construction inspection period for all on-site alternatives. Given the proximity of Station #58 and with all new structures constructed in compliance with Fire and Building Code regulations, the susceptibility and exposure of the project to wildland fires would be limited. The WLCSP addresses potential impacts related to future fire protection services for this area by including a new fire station site. In addition, buildings will be setback from the western side of Gilman Springs Road due to the location of the San Jacinto Fault through this area, which will further reduce the potential for project fire risks. Implementation of these measures will help reduce potential wildland fire risks to a less than significant level, and no additional mitigation is required.

All on-site alternatives will be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate emergency access and evacuation will be provided. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/any required road closures. Compliance with existing regulations for emergency access and

¹ Letters from Fire Chief dated May 4 and June 27, 2011, and City of Moreno Valley General Plan, Final Program EIR, Section 5.5 Hazards, Figure 5.5-2.

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evacuation will ensure that impacts related to this issue are less than significant, and no mitigation is required.

Due to the suspected age of the rural residential structures on the site, it is possible that demolition of these structures may involve asbestos-containing materials (ACMs) and/or lead-based paint (LBP). Demolition of these structures may need to be supervised or conducted by contractors certified to remove and dispose of ACMs and/or LBP.

In addition, Alternatives 1, 2, and 3 include a liquefied natural gas/compressed natural gas (LNG/CNG) fueling station to be constructed somewhere in the Logistics Development (LD) land use area. This LNG/CNG facility is referred to as “logistics support” in the WLC Specific Plan. It would sell natural gas to fuel vehicles serving or visiting the project. This facility is not proposed under the No Project/No Build Alternative or the No Project/Existing General Plan Alternative. Since this facility would store natural gas under liquefied and/or compressed conditions, there is a potential for fire and/or explosion, creating a potentially significant hazards impact requiring mitigation.

With implementation of Mitigation Measures 4.8.6.1A and 4.8.6.1B, impacts associated with potential hazardous materials in existing rural residential structures (all on-site alternatives) or from the proposed fueling facility will be reduced to less than significant levels for Alternatives 1, 2, and 3.

6.3.2.6 Hydrology and Water Quality

As with the proposed project, the development of any of the on-site alternatives would require the modification of the existing on-site pattern of drainage and would require the installation of drainage improvements that may include on-site collection/routing pipes, landscaped swales, sand filters, and porous pavement features.¹ While the extent of the impermeable surfaces (rooftops, driveways, parking areas, etc.) required under each alternative is reduced from that required for the proposed project, the environmental impact of these improvements would be similar. All local, State, and Federal policies and regulations pertaining to surface water and groundwater resources would remain in effect under these alternatives. Sedimentation and erosion from any on-site development has the potential to affect water quality. Similar to the proposed project, the construction of any on-site use would be required to follow applicable NPDES requirements, including the preparation of and adherence to an SWPPP and BMPs.² These requirements have been incorporated as Mitigation Measures 4.9.6.1A through 4.9.6.1C (refer to Section 4.9.6.1 of the EIR) and Mitigation Measures 4.9.6.2A through 4.9.6.2C (refer to Section 4.9.6.2 of the EIR). As with the proposed project, runoff from paved surfaces, especially during “first-flush” events, may be contaminated by sediment, debris, and other contaminants. A standard condition with any such development would be preparation and implementation of a Water Quality Management Plan, which would effectively mitigate post-construction water quality impacts from the developed area. This requirement has been incorporated as Mitigation Measure 4.9.6.2A (refer to Section 4.9.6.2 of the EIR). The project site is not identified as a groundwater recharge area, so none of the on-site alternatives would interfere with groundwater recharge. Anticipated on-site flows would be routed to the onsite and off-site water quality features such as vegetated swales, clarifiers, and sand filters to protect downstream water quality.

New development is required to maintain off-site flows to below or equal to pre-development conditions, and this is incorporated as Mitigation Measure 4.9.6.1A (refer to Section 4.9.6.1). The project site is not located within a flood zone and the project site is not susceptible to mudslides, tsunamis, seiches, or flooding as a result of dam or levee failure. Similar to the proposed project,

¹ *Draft Master Plan of Drainage Report for World Logistics Center Specific Plan and Environmental Impact Report*, CH2MHILL, September 2014.

² *Preliminary Water Quality Management Plan for World Logistics Center Specific Plan*, CH2MHILL, September 2014.

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potential impacts related to hydrology and water quality would be less than significant for all on-site alternatives.

6.3.2.7 Land Use and Planning

Like the proposed project, these alternatives would comply with applicable provisions of local and regional plans (e.g., Water Quality Control Plan and Air Quality Management Plan). However, the proposed project was not included as part of the 2007 AQMP and is considered to not be consistent with the AQMP. This is a significant and unavoidable impact. Compliance with applicable City policies related to development within the project site would ensure that on-site alternative uses would be compatible with existing development in the project area. Land uses associated with less intense alternatives may have less impact on existing on-site land uses compared to the proposed project, depending on the types of uses proposed.

6.3.2.8 Mineral Resources

There are no lands within the City of Moreno Valley designated by the California Department of Conservation as known significant resource areas, defined by the state as Mineral Resources Zone 2 areas. As identified in the City's General Plan, lands within the City of Moreno Valley and its Sphere of Influence are designated MRZ-3 and MRZ-4 zones, which are not defined as significant mineral resource areas. Development of the project site with any build alternatives would not result in the loss of or reduce the availability of mineral resources or the resource base from which they would be derived. Compared with the proposed project, no greater impact would occur for any of the on-site project build alternatives.

6.3.2.9 Public Services/Recreation

As with the proposed project, none of the build alternatives would include a residential component (with the exception of the No Project/Existing General Plan Alternative) and potential jobs generated by the build alternatives would be filled to some degree by people already residing in the City, similar to the proposed project. Therefore, there would be no increase in existing population and no increase in demand for park and recreation facilities resulting from development of Alternatives 1 or 2. Alternative 3 would have increased population from new housing under the MHSP land use plan; it would also have parks to serve those new residents. Because no increase in demand for City recreational facilities would occur, impacts associated with recreation for any of the build alternatives would be similar in magnitude as the proposed project. Compared with the proposed project, no greater impact would occur for any of the project build alternatives.

6.3.3 Description and Impact Analysis of Alternatives

The following discussion compares the impacts of each alternative with the impacts of the proposed project, as detailed in Sections 4.1 through 4.16 of this EIR. A conclusion is provided as to whether each alternative would result in one of the following:

- Reduction or elimination of the impact;
- A greater impact than the project;
- The same impact as the project; or
- A new impact in addition to the impacts of the proposed project impacts.

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6.3.4 No Project/No Build Alternative

NOTE: The following changes have been made due to revision to the Specific Plan project size.

Under the No Build Alternative, no development would take place within the project limits. No ground-disturbing activities would take place, nor would any form of structure or facility be erected. Impacts associated with this alternative, when compared to the proposed project, would not occur. In the absence of development, no impacts would occur and this alternative would be the environmentally superior alternative. However, prohibiting development of the site, as suggested by this alternative, would not fulfill any of the primary objectives of the proposed project. Retention of the project site in its current condition would not create a high cube logistics facility consisting of approximately 2,610 acres of high-cube warehouse uses and it would not expand employment opportunities within the City and surrounding area. This alternative provides a baseline comparison to the proposed project.

Impact Analysis. The No Project/No Build Alternative would not result in any new physical environmental effects. However, this alternative would not meet any of the project objectives as identified in Table 6.D.

Note: The objectives outlined in this table did not correspond to the Project Objectives outlined in the Project Description of the DEIR, therefore, they are being corrected at this time.

Table 6.D: Comparison of No Project/No Build Alternative to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.	No
Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan.	No
Create a major logistics center with good regional and freeway access.	No
Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.	No
Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings.	No
Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach.	No
Create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity.	No
Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.	No
Encourage new development consistent with regional and municipal service capabilities.	No
Significantly improve the City's jobs/housing balance and help reduce unemployment within the City.	No
Provide thousands of construction job opportunities during the project's buildout phase.	No
Provide appropriate transitions or setbacks between on-site and off-site uses.	No

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6.3.5 No Project/Existing General Plan Alternative

This section has been revised in response to Comment G-95-83 in Letter G-95 from Thomas Thornsley. The CDFW Conservation Buffer Area (approximately 1,000 acres) has been removed from this alternative analysis. The 1,000 acre CDFW Conservation Buffer Area is approximately 33 percent of the existing General Plan. Therefore, this analysis was revised by reducing impacts estimated in the original DEIR by approximately 33 percent.

Pursuant to CEQA (§15126.6[e][2]), the No Project Alternative should discuss what would reasonably be expected to occur, based on current plans and consistent with available infrastructure and community services, in the foreseeable future. It is reasonable in the event the proposed project were not approved, the site would be developed in accordance with the existing General Plan land uses in the future.

The No Project/Existing General Plan Alternative would result in development of the project with the land uses currently shown in the City's General Plan. The City's General Plan currently designates the project area as a mix of residential, commercial, business park, and open space land uses in accordance with the MHSP. The approved 2,038-acre MHSP (without the CDFW Conservation Buffer Area) is a master planned, mixed-use community, consisting of up to 4,051 residential dwelling units on approximately 1,435 acres and approximately 603 acres of business, retail, institutional, and other uses. The 1,085 acres owned by the CDFW are currently designated as Residential, Public Facilities, and Open Space in the City's General Plan however, as it is owned by the CDFW, this area would not be developed and the property will not remain with these designations as part of this alternative.

The following impact analysis for this alternative evaluates the same seventeen environmental topics addressed for the proposed project as contained in Sections 4.1 through 4.16 of this EIR.

Impact Analysis. Eight environmental issues would have impacts similar to those identified for the proposed project. These include the following:

- Agricultural and Forestry Resources
- Cultural Resources
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Recreation

Impacts associated with these topics would be similar to the proposed project because development of the site under the No Project/Existing General Plan Alternative would result in a similar footprint of development. For this reason, impacts to these land-oriented impact topics would be similar resulting in the same level of impact. The remaining environmental issues would, in some cases, result in similar impacts, but would be different enough to be discussed separately.

Aesthetics: The No Project/Existing General Plan Alternative would introduce a variety of residential and non-residential buildings on the site that would be much lower in height than the proposed WLC project in conformance with City Development Code standards. As a result, views of surrounding uplands from adjacent roadways (e.g., Redlands Boulevard, SR-60, and Gilman Springs Road) would not be blocked and aesthetic impacts would likely be less than significant, subject to architectural and design review of actual proposed buildings in the future. Development under this alternative would reduce potential aesthetic impacts to less than significant levels.

Air Quality: The No Project/Existing General Plan Alternative would require site grading and construction similar to that required of the proposed project. As identified in Section 4.3 of this EIR, short-term construction emission impacts associated with construction activities on the project site

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were significant and unavoidable for all criteria pollutants with the exception of SO_x. Since the No Project/General Plan Alternative would require that the same amount of land be graded, it would require similar grading and construction activities on site. Therefore, it is reasonable to anticipate that short-term construction emission impacts would also be significant and unavoidable for all criteria pollutants, with the exception of SO_x, under this alternative. Air quality impacts associated with the remaining criteria pollutants would be significant and unavoidable with this alternative, similar to what was identified for the proposed project.

Under the No Project/Existing General Plan Alternative, the site would be developed with approximately 361 acres of business park uses, 106.5 acres of professional/medical office uses, and up to 4,051 residential units on 709.3 acres. Based on these land uses, the No Project/Existing General Plan Alternative would generate approximately 119,667 daily vehicle trips. The total trip generation associated with this alternative is approximately 72 percent higher than that identified for the proposed project.

Similar to the proposed project, the traffic increase under this alternative contributes to significant and unavoidable emissions of CO, VOC, NO_x, PM₁₀, and PM_{2.5} based on SCAQMD daily air quality significance thresholds. Therefore, this alternative would also have significant and unavoidable impacts on local air quality. The long-term air quality impacts resulting from this alternative would still contribute criteria pollutants to an air basin that is in nonattainment for these criteria pollutants, similar to the proposed project. As identified in Table 6.E, long-term operational air pollutant emissions associated with the No Project/Existing General Plan Alternative would exceed SCAQMD emissions thresholds for all criteria pollutants, with the exception of SO_x.

When compared with the proposed project, emissions of NO_x and PM₁₀ associated with the No Project/Existing General Plan Alternative would decrease and emissions of CO and VOC would increase. PM_{2.5} emissions are similar for both the project and the No Project. Similar to the proposed project, the generation of these emissions would still result in a cumulative contribution of air pollutants in a nonattainment basin; therefore, impacts remain significant and unavoidable.

Note: The air pollutant and greenhouse gas emissions for this alternative were revised, as the dwelling units assumed in the DEIR (7,283 units), was changed to 4,051 units. In addition, the home-work trip length was increased from 10 miles to 27 miles (see the 2015 Air Quality, Greenhouse Gas, and Health Risk Assessment Report).

Table 6.E: No Project/Existing General Plan Alternative Operational Emissions

Source	Pollutant Emissions, lbs/day					
	CO	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}
Proposed Project (mitigated; without existing)	1,396	593	1,097	NA	1,121	304
No Project/Existing General Plan	3,494	765	712	14	973	300
Net Change (no project minus proposed)	+2,098	+172	-385	NA	-148	-4
SCAQMD thresholds	550	55	55	150	150	55
Alternative exceeds thresholds?	Yes	Yes	Yes	No	Yes	Yes

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment Report, 2015

Global Climate Change: GHG emissions associated with the No Project/Existing General Plan Alternative are correspondingly decreased as this alternative does not include a logistics warehouse component. As identified in Table 6.F, the No Project/Existing General Plan Alternative would

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generate metric tons of 2,601 uncapped CO₂ equivalent¹ (mt CO₂e), which is approximately 58 percent less than what was identified for the proposed project.

Table 6.F: Comparison of Greenhouse Gas Emissions

Type of Development	AB 32 Capped Annual Mitigated MTCO ₂ e Emissions	Uncapped Annual Mitigated MTCO ₂ e Emissions	Change from Uncapped Project Emissions
Proposed Project	372,073	6,210	0%
No Project/No Build ¹	59	0	-100%
No Project/General Plan ²	264,089	2,601	-58%
Alternative 1: Reduced Density	260,451	4,347	-30%
Alternative 2: Mixed Use A	574,763	6,856	+10%
Alternative 3: Mixed Use B	222,235	2,925	-53%
Alternative Sites	372,073	6,210	0%

MTCO₂e is metric tons of carbon dioxide equivalents, which is a standard unit of measure for greenhouse gases.

¹ Estimated based on existing tractor uses.

² Based on approved Moreno Highland Specific Plan.

Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment*, 2015 (see Appendix D); construction emissions excluded.

Hazards and Hazardous Materials: Development of the No Project/Existing General Plan Alternative would still result in the on-site handling of hazardous substances, both during project construction and operation. It is reasonable to assume that, like any current use, these substances would continue to be used in accordance with applicable local, State, and Federal standards. Impacts associated with the transport or use of hazardous materials or potential upsets or accidents would not be increased in magnitude because the intensity of development is still below what is envisioned under the proposed project. Therefore, it is not expected that increased quantities of hazardous materials would be present on site. With the adherence to existing hazardous materials regulations, impacts associated with hazards and hazardous materials under the No Project/Existing General Plan Alternative would remain less than significant.

Under this alternative, a liquefied natural gas/compressed natural gas (LNG/CNG) fueling station would not be constructed on the site, so there would be no potential for fire and/or explosion involving natural gas. Therefore, this impact is reduced from that identified under the proposed project.

Noise: The No Project/Existing General Plan Alternative would result in the construction of a mix of residential, commercial, business park, and open space land uses in accordance with the MHSP. As identified in Section 4.12 of this EIR, short-term construction noise impacts associated with the development of the project site were significant and unavoidable for both on-site and off-site uses. Since the No Project/Existing General Plan Alternative would require similar site development during construction, short-term construction noise impacts would also be significant and unavoidable and similar in magnitude compared to the proposed project. The increase in project-related traffic under the No Project/Existing General Plan Alternative would result in an increase in traffic-related noise. When compared to the proposed project, noise impacts associated with the No Project/Existing General Plan Alternative would be increased in magnitude as there would be a reduction in vehicles.

¹ Carbon dioxide equivalent (CO₂e) is an internationally accepted measure that expresses the amount of other greenhouse gases (e.g., methane and nitrous oxide) in terms of the amount of carbon dioxide (CO₂). The CO₂e measure is used as a way to measure the warming potential of a greenhouse gas as compared to CO₂.

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However, impacts would remain significant and unavoidable as some noise would still be generated under this alternative and there is no feasible mitigation to reduce noise impacts.

Population and Housing: The No Project/Existing General Plan Alternative would result in the development of up to 4,051 residential dwelling units on 709.3 acres and approximately 603 acres of business, retail, institutional, and other uses. Based on the California Department of Finance Population and Housing Estimates,¹ the City of Moreno Valley is estimated to have approximately 3.783 persons per household. Based on this figure, the construction of up to 4,051 residential dwelling units is projected to increase the City's population by approximately 15,325 persons resulting in a direct population increase in the City. This level of population growth is not accounted for with the proposed project and potential impacts related to population growth are greater than that identified for the proposed project. Construction of the development envisioned under this alternative would create temporary construction jobs, and some portion of these jobs would be likely filled by people already residing within the City. Utilizing an employment factor of one employee for every 629 square feet of commercial retail/service space,² the No Project/Existing General Plan Alternative is anticipated to generate approximately 1,749 commercial service jobs.³ Utilizing an employment factor of one employee for every 1,548 square feet of business park (light industrial) space,⁴ the No Project/Existing General Plan Alternative is anticipated to generate approximately 5,103 business park jobs.⁵ Under this alternative, additional jobs would be generated by the introduction of commercial retail/service uses (addition of 1,749 jobs) and business park uses (addition of 5,103). When this alternative is compared to the proposed project, the number of new jobs in the City would be a 72 percent decrease from the proposed project (6,852 jobs opposed to approximately 24,000 jobs).

The No Project/Existing General Plan Alternative would result in a decreased number of jobs created from the development of commercial retail/service and business park uses in comparison to the proposed project. However, a large influx of new residents to the City is anticipated due to the construction of up to 4,051 residential dwelling units envisioned by this alternative. The project would not directly affect population growth as compared with new residential development, because it is not creating homes. While the proposed project would generate employment opportunities, the jobs created are not expected to induce substantial growth in the City or region over and above the growth anticipated by the City's General Plan and the SCAG's regional growth forecasts. Population and housing impacts under this alternative would be greater in magnitude when compared to the proposed project. Therefore, impacts associated with this issue would be greater.

Public Services: Unlike the proposed project, demands on schools, parks, other public facilities, law enforcement, and fire protection services would be greater in magnitude as residential uses (impacts to schools and parks) are proposed under this alternative. Like the proposed project, development under this alternative would require payment of development impact fees for schools, police services, and fire services. The payment of development impact fees would be expected to offset impacts to these public services that would result from the development of this alternative. Therefore, when compared to the proposed project, impacts associated with public services would remain less than significant with the payment of development impact fees and increased property tax revenues.

Unlike the proposed project, the No Project/Existing General Plan Alternative proposes the construction of residential uses. Therefore, implementation of this alternative would result in an

¹ State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011 and 2012, with 2010 Benchmark*. Sacramento, California, May 2012.

² *Table IIB Average Number Employee per Square Foot, Employment Density Report*, Southern California Association of Governments, Natelson Company, Inc, October 2001.

³ Utilizing 1 employee/629 square feet of service use x 1,100,000 square feet of commercial retail/service use = 1,749 jobs.

⁴ *Table IIB Average Number Employee per Square Foot, Employment Density Report*, Southern California Association of Governments, Natelson Company, Inc, October 2001.

⁵ 1 employee/1,548 square feet of business park (light industrial) use x 7,900,000 square feet of service use = 5,103 jobs.

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increase in existing population and a corresponding increase in demand for park and recreation facilities resulting from development. Because a potential increase in demand for recreational facilities would occur, impacts associated with recreation for this alternative would be greater in magnitude as compared to the proposed project, but would still be expected to be less than significant with the provision of parkland and open space as part of the alternative project, increased property tax revenues, and payment of park fees as applicable.

Traffic: As indicated in Table 6.G, the No Project/Existing General Plan Alternative would generate approximately 119,668 daily vehicle trips. Compared to the proposed project, the No Project/Existing General Plan Alternative, which assumes development of existing General Plan uses, would result in an increase of 72 percent of daily traffic trips. The increase in traffic may cause an existing intersection or roadway segment to operate at a deficient LOS. While significant traffic impacts may occur under this alternative, these impacts would be mitigated in a manner similar to those of the proposed project. However, despite the identification of mitigation measures, certain freeway segments and interchange improvements would not be under the jurisdiction of the City and cannot be guaranteed to be in place when development under this alternative would become operational. Therefore, when compared to the proposed project, traffic impacts would be greater due to the additional trip generation. However, the resulting impact significance would be similar and would remain significant and unavoidable until the improvements are in place.

Table 6.G: Comparison of Average Daily Trips

Type of Development	Average Daily Trips	Change
Proposed Project ¹	69,542	
No Project/No Build	314	-99.6%
No Project/Existing General Plan ²	119,668	+72%
Alternative 1: Reduced Density	48,321	-28%
Alternative 2: Mixed Use A	208,988	+201%
Alternative 3: Mixed Use B	78,985	+14%
Alternative Sites	69,542	0%

¹ Based on WLC project traffic study by Parsons Brinckerhoff dated September 2014.

² Based on modified Moreno Highland Specific Plan (see Table 6.C).

Source: Parsons Brinckerhoff estimates based on project traffic study, September 2014 (see Appendix D).

Utilities and Service Systems: Existing utility infrastructure for storm water and wastewater is present in adjacent roadways or parcels. Like the proposed project, the applicant would connect to existing utility infrastructure subject to the terms and conditions of the City, EMWD, and RCFCWCD. As indicated in Table 6.H, the No Project/Existing General Plan Alternative would generate approximately 1,569,083 gallons of wastewater per day, which is almost nine times the amount of wastewater that would be generated by the proposed project. Similar to the proposed project, development under this alternative would be required to pay infrastructure fees and obtain approval from the wastewater treatment provider that would ensure there is excess capacity for the wastewater that would be generated by the proposed development. Therefore, impacts related to wastewater and wastewater treatment would remain less than significant when compared to the proposed project.

Table 6.H: Comparison of Average Wastewater Generation

Type of Development	Gallons per day
Proposed Project	286,459
No Project/No Build	2,156
No Project/Existing General Plan (MHSP)	1,569,083
Alternative 1: Reduced Density	198,376

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Table 6.H: Comparison of Average Wastewater Generation

Type of Development	Gallons per day
Alternative 2: Mixed Use A	1,830,000
Alternative 3: Mixed Use B	1,681,656
Alternative Sites	286,459

Source: EIR Section 16 and Sewage Generation Rates, Draft CEQA Thresholds Guide, 2006.

The development of the existing General Plan land uses associated with this alternative would also require the installation of water supply infrastructure to serve the project site. As indicated in Table 6.I, the No Project/Existing General Plan Alternative would require approximately 4,888,456 gallons of water per day, which is almost three times what would be required by the proposed project. When compared to the proposed project, water usage demands would be substantially increased in magnitude.

Table 6.I: Comparison of Average Water Use

Type of Development	Gallons per day
Proposed Project	1,761,260
No Project/No Build	5,569
No Project/Existing General Plan (MHSP)	4,888,456
Alternative 1: Reduced Density	1,202,011
Alternative 2: Mixed Use A	3,420,000
Alternative 3: Mixed Use B	5,196,801
Alternative Sites	1,761,260

Source: DEIR Section 16 and *Water System Planning and Design Principle Guidelines Criteria*, Eastern Municipal Water District, February 2006.

Like the proposed project, the No Project/Existing General Plan Alternative would also generate solid waste. As identified in Table 6.J, this alternative would generate 17,494 tons of solid waste per year, which is 47 percent less than what the proposed project would generate. Therefore, demands on solid waste services and landfill capacity would be decreased in magnitude. Similar to the proposed project, development under the No Project/Existing General Plan Alternative would be required to adhere to the provisions of the solid waste provider that would service the project site. When compared to the proposed project, solid waste impacts under this alternative would remain less than significant.

Table 6.J: Comparison of Average Solid Waste Generation

Type of Development	Tons per year
Proposed Project	37,016
No Project/No Build	125
No Project/Existing General Plan	17,494
Alternative 1: Reduced Density	30,786
Alternative 2: Mixed Use A	481,344
Alternative 3: Mixed Use B	116,880
Alternative Sites	37,016

Source of proposed project and alternative sites: Table 10.1 of the CalEEMod manual
Source: DEIR Section 16 and *Estimated Solid Waste Generation Rates*, California Integrated Waste Management Board, <http://www.ciwmb.ca.gov/WASTECHAR/WasteGenRates/Commercial.htm>, website accessed December 3, 2012.

Cumulative Impacts: Similar to the proposed project, this alternative would contribute toward the permanent conversion of farmland, air quality operational emissions, short-term and long-term noise impacts, and increased traffic operations on local roadways and at local intersections. Although this alternative would have a greater amount of traffic, the amount of operational emissions would be

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reduced in magnitude from that identified for the proposed project as this alternative does not include a logistics warehouse component. Because there are no feasible mitigation measures to reduce the cumulative impacts associated with long-term operational air pollutant emissions, noise, and increased traffic, long-term air quality and traffic impacts would remain significant and unavoidable.

Impact Conclusions. Under the No Project/Existing General Plan Alternative, impacts related to short-term construction-related air quality would be similar to the proposed project as the same amount of land would be disturbed and the same mix of equipment would be utilized. Long-term operational-related air quality impacts would be reduced from that identified for the proposed project but would remain significant and unavoidable. Under this alternative, population and housing impacts would be greater in magnitude as residential uses are proposed. Similar to the proposed project, the associated increases in employment are accounted for in the City General Plan and other applicable local and regional plans.

The development of the No Project/Existing General Plan Alternative would have increased demands on public services and recreation facilities due to the residential component and population growth, however, the payment of fees, provision of onsite parkland and open space, higher property tax revenues, and adherence to development requirements would reduce these impacts to a less than significant level. Water supply availability is expected to be available although water demand is increased. Water demand was determined to be available for the proposed project. Because of the increase in vehicle trips achieved under this alternative, impacts to the operation of local roadways and intersections would be proportionally greater than what was identified for the proposed project; therefore, long-term traffic impacts would remain significant and unavoidable. Traffic-related noise would be greater in magnitude and noise impacts would be significant and unavoidable like the proposed project.

Meets Project Objectives. Under this alternative, only some of the proposed project objectives would be met as a variety of uses would be built, as shown in Table 6.K. Development of this alternative would provide new employment opportunities for residents of Moreno Valley but not nearly to the degree as the proposed project.

Note: The objectives outlined in this table did not correspond to the Project Objectives outlined in the Project Description of the DEIR; therefore, they are being corrected at this time.

Table 6.K: Comparison of No Project/Existing General Plan Alternative to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.	No
Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan.	No
Create a major logistics center with good regional and freeway access.	No
Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.	Yes
Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings.	No
Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach.	No
Create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity.	No

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Table 6.K: Comparison of No Project/Existing General Plan Alternative to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.	No
Encourage new development consistent with regional and municipal service capabilities.	Yes
Significantly improve the City's jobs/housing balance and help reduce unemployment within the City.	Yes
Provide thousands of construction job opportunities during the project's buildout phase.	No
Provide appropriate transitions or setbacks between on-site and off-site uses.	Yes

6.3.6 Alternative 1: Reduced Density

NOTE: The following changes have been made due to revision to the Specific Plan project size.

With the intent of avoiding or substantially reducing significant impacts, and in particular the significant impacts that cannot be reduced to a less than significant level through implementation of mitigation measures created by the project's traffic, air quality, and noise impacts, the City has considered a Reduced Density Alternative. This alternative includes development of the project site with approximately 28 million square feet of logistics warehousing, including 74.3 acres for open space. The 1,085 acres owned by the CDFW would be designated as Open Space in the City's General Plan, similar to the proposed project. Under this alternative, the proposed logistics uses would represent a net decrease of approximately 31 percent (28 million square feet) as compared with the proposed project.

Because of the large area, approximately 2,610 acres, of the proposed project that is proposed for development, public facilities, or off-site improvements, a variety of reduced density alternatives could be considered that might substantially reduce or eliminate one or more of the significant and unavoidable impacts of the proposed project. For example, warehousing development on the site would have to be reduced to approximately one percent of the project site, or 400,000 square feet, of the WLC project's proposed high-cube logistics warehouse building area in order to eliminate significant and unavoidable impacts associated with air quality in order to reduce air pollution emissions to less than applicable SCAQMD thresholds. The only way this could logically occur would be to develop a small portion of the site (i.e., less than one percent) and leave the rest of the site vacant. In addition, even this substantial reduction in the proposed high-cube logistics warehouse building area and/or developable area would not eliminate the proposed project's other significant and unavoidable impacts associated with aesthetics, air quality, noise, and transportation listed above in 6.1.3. Any of the viable alternatives that are examined in this EIR would entail some type of development on all or most of the project site, rather than development of an illogically small portion of the site (i.e., one percent).

Impact Analysis. The following nine environmental issues would have impacts similar to those identified for the proposed project:

- Aesthetics
- Agricultural and Forestry Resources
- Cultural Resources
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources

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- Biological Resources
- Recreation
- Geology and Soils

Impacts associated with these topics would be similar to the proposed project because development of the site under Alternative 1 would result in a similar footprint of development but with less square footage for logistics warehouse buildings. For this reason, impacts to these land-oriented impact topics would be similar resulting in the same level of impact.

As identified in Section 4.1 of this EIR, the proposed project would result in significant and unavoidable impacts associated with scenic vistas, local scenic roads, character of the site and surroundings, and cumulatively considerable aesthetic impacts. Implementation of this alternative would result in development of the same high-cube logistics land uses, building heights and mass, but at a level equivalent to 70 percent of the proposed project. For this reason, and in the same exact manner as the proposed project, this alternative would result in significant and unavoidable impacts associated with scenic vistas, local scenic roads, character of the site and surroundings, individually and on a cumulatively considerable basis.

As identified in Section 4.2 of this revised EIR, the proposed project would not result in significant impacts associated with the loss of unique farmland, the elimination of existing agricultural operations, or cumulatively considerable agricultural resources impacts with implementation of the recommended mitigation, including acquisition of an offsite agricultural conservation easement. Implementation of this alternative would result in development on the same existing agricultural lands, but each development site would be developed at a level equivalent to 70 percent of the proposed project. Therefore, this alternative would not result in significant impacts associated with the loss of unique farmland, the elimination of existing agricultural operations, and on a cumulatively considerable basis.

The remaining environmental issues would, in some cases, result in similar impacts, but would be different enough to be discussed separately as follows.

Air Quality: Because the amount of land to be graded with Alternative 1 would be the same to that of the proposed project, the same quantity of construction equipment would be used and a similar quantity of building materials would be used during earthmoving activities. Therefore, construction emissions from the development of Alternative 1 would be similar as the proposed project; perhaps slightly decreased. As identified in Section 4.3 of this EIR, the proposed project would result in significant and unavoidable air quality impacts from CO, VOC, NO_x, and PM₁₀ air pollution emissions and localized PM₁₀ concentrations. Implementation of this alternative would result in development on the same land areas, but each development site would be developed at a level equivalent to 70 percent of the proposed project. For this reason, and in approximately the same manner as the proposed project, the Reduced Density Alternative would result in significant and unavoidable air quality impacts from CO, VOC, NO_x, and PM₁₀ emissions during project construction.

Assuming the same level of mitigation as the proposed project, there would be no cancer risks associated with this alternative since the use of new technology diesel engines do not contribute to cancer risk as described in Section 4.3.

Under this alternative, average daily traffic volumes would be reduced by approximately 30 percent in comparison with the proposed project. As indicated in Table 6.L, the volume of each operational pollutant emitted during operation of this alternative would be correspondingly reduced. However, operational emissions for CO, VOC, NO_x, PM₁₀, and PM_{2.5} would exceed daily SCAQMD thresholds for air pollution emissions as shown in Table 6.L, in the same manner as the proposed project. Although the application of green building design principles may reduce emissions from building

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operations (such as heating and cooling), such standards and principles would not reduce CO, VOC, NO_x, PM₁₀, and PM_{2.5} emissions to below SCAQMD thresholds.

NOTE: The Alternative 1 air pollutant and greenhouse gas emissions have decreased because part of the emissions were based on a percentage of the project's emissions (which have decreased) and the other emissions were remodeled.

Table 6.L: Alternative 1 Operational Emissions

Source	Pollutant Emissions, lbs/day					
	CO	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}
Proposed Project	1,396	593	1,097	21	1,121	304
Alternative 1	977	415	768	15	785	213
Net Change (Alternative minus proposed)	-419	-178	-329	-6	-336	-91
SCAQMD thresholds	550	55	55	150	150	55
Alternative 1 exceeds thresholds?	Yes	Yes	Yes	No	Yes	Yes

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment, 2015.

As shown in Table 6.L, the volume of operational air pollutant emissions would be reduced when compared to the proposed project. As identified in Section 4.3 of this EIR and as stated above, the proposed project would result in air quality impacts from CO, VOC, NO_x, PM₁₀, and PM_{2.5} operational emissions that cannot be mitigated to below SCAQMD thresholds, resulting in significant and unavoidable impacts. Similarly, the Reduced Density Alternative would result in air quality impacts from CO, VOC, NO_x, PM₁₀, and PM_{2.5} operational emissions that cannot be mitigated to below SCAQMD thresholds, resulting in significant and unavoidable impacts in approximately the same manner as the proposed project.

Global Climate Change: As identified in Section 4.7 of this EIR, the proposed project would generate approximately 6,200 MTCO_{2e} per year at buildout from uncapped operational sources after mitigation, resulting in a less than significant impact. As identified in Table 6.F, the Reduced Density Alternative would generate 4,347 MTCO_{2e} per year of uncapped emissions. GHG emissions resulting from operation of the uses envisioned under the Reduced Density Alternative would be correspondingly reduced in comparison to the proposed project, as this alternative would reduce the number of daily traffic trips and energy consumed by approximately 30 percent. Although the Reduced Density Alternative would generate approximately 30 percent less GHG than the proposed project, impacts associated with cumulative global climate change would remain less than significant in approximately the same manner as the proposed project, since it is assumed that this alternative would incorporate similar mitigation as for the project.

Noise: As identified in Section 4.12 of this EIR, construction-related noise impacts of the proposed project were reduced through mitigation measures. However, construction-related noise impacts within the Specific Plan area and off-site construction area would remain significant and unavoidable, even with implementation of the mitigation measures. Under the Reduced Density Alternative, the same amount of land would be disturbed, the same quantity of construction equipment would be used, and a similar quantity of building materials would be used. Therefore, noise impacts associated with the construction of this alternative would be the same as those identified under the proposed project, but would likely occur over a shorter period of time due to the reduced square footage. As identified in Section 4.12 of this EIR and as stated above, the proposed project would result in construction-related noise impacts within the Specific Plan area and off-site construction area that cannot be mitigated to below a level of significance. Consequently, impacts would remain significant and unavoidable. With the implementation of mitigation identified for the proposed project, the short-term construction-related noise impacts associated with the Reduced Density Alternative would also remain significant and unavoidable in the same exact manner as the proposed project, as

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construction noise is not able to be reduced to noise levels less than 60 dBA (L_{eq}). As with the proposed project, the noise generated under the Reduced Density Alternative would also be generated during loading/unloading, truck movements on roadways, and parking lot activities.

As identified in Section 4.12 of this EIR under the proposed project, the increase in future traffic noise along certain local roadway segments would increase beyond the threshold of perception resulting in an impact and the need for mitigation. However, as stated in the EIR, there are no feasible mitigation measures to reduce noise levels to below significant levels. The reduction in project-related traffic under the Reduced Density Alternative (i.e., minus approximately 30%) would result in a similar decrease in long-term traffic noise due to the reduction of traffic trips to the project site. However, under this alternative, the future increases in traffic-related noise would have a similar effect on local roadway segments, resulting in significant impacts in approximately the same manner as the proposed project. Although this alternative's contribution to future traffic noise would be reduced, thereby reducing overall mobile source noise impacts within the area, even with a reduction in overall mobile source noise, roadway noise along certain roadway segments would remain significant and unavoidable in approximately the same manner as the proposed project.

Population and Housing: This alternative would result in the development of approximately 28 million square feet of logistics space. Utilizing an employment factor of one employee for every 1,667 square feet of logistics space,¹ the Reduced Density Alternative is anticipated to generate approximately 16,797 jobs.² It is anticipated that most of these jobs would be filled by persons already residing in the area; therefore, no significant population increase would occur with the development of these logistics jobs. When this alternative is compared to the proposed project, the number of new jobs would be approximately 30 percent less than the proposed project. Similar to the proposed project, impacts related to population and housing would remain less than significant as this alternative would continue the existing development trend envisioned by the City. This alternative would not improve the City's jobs/housing ratio to nearly the same degree as the proposed project.

Public Services: Demands on schools, parks, other public facilities, law enforcement, and fire protection services would be incrementally less but in general similar in magnitude as that associated with the proposed project as no residential uses (and corresponding impacts to schools and parks) are proposed under this alternative. Like the proposed project, development under this alternative would require payment of development impact fees for schools, police services, and fire services. The increase in property taxes and payment of development impact fees would offset impacts to public services that may result from the development of the uses envisioned under this alternative. Similar to the proposed project, impacts associated with public services would remain less than significant.

Traffic: As identified in Section 4.15 of this EIR, the proposed project would result in significant impacts to freeways and interchanges in the baseline condition and future year (2022, 2030, and 2035) time horizons. Because improvements to freeways and interchanges are under the authority of Caltrans, it is uncertain if improvements to these roadways would be constructed prior to when project impacts would occur, resulting in a significant and unavoidable significant to freeways and interchanges. As identified in previously referenced Table 6.G, the Reduced Density Alternative would generate approximately 48,321 total vehicle trips, which is approximately 30 percent less than the total trip generation for the proposed project (69,542 total vehicle trips). The reduction in traffic under the Reduced Density Alternative (i.e., minus approximately 30%) would result in a similar decrease in traffic volumes on local roadways. However, under this alternative, the future increases in traffic volumes would have a similar effect on freeways and interchanges, resulting in significant impacts similar to those identified for the proposed project. Since the City does not have control over when freeway improvements would occur, traffic impacts to freeways and interchanges would remain

¹ Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California, David Taussig & Associates, Inc., September 2014.

² 1 employee/1,667 square feet of logistics uses x 28,000,000 square feet of logistics use = - 16,797 logistics jobs.

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significant and unavoidable in approximately the same manner as the proposed project, until such improvements can be installed or constructed by Caltrans.

Utilities and Service Systems: Limited storm water and wastewater infrastructure is currently located in adjacent roadways or parcels within the project area. Like the proposed project, development under this alternative would be required to provide necessary infrastructure to support the future development of the site. The resulting development under this alternative would be subject to the terms and conditions of the City and EMWD. Similar to the proposed project, development under the Reduced Density Alternative would also include implementation of master plans for potable water, sewer, recycled water, and drainage for the project study area. Since the development under this alternative would be similar in use and size to the proposed project, it is anticipated that the same type and quantity of utility infrastructure would be required for the area. Therefore, implementation of these master plans under this alternative would have similar impacts to those identified for the proposed project.

The development of the Reduced Density Alternative would require the installation of water supply infrastructure of a size and extent needed to serve the proposed project. As indicated in previously referenced Table 6.I, the amount of water demand associated with the Reduced Density Alternative (1,202,011 gallons per day) would be 32 percent less than that required for the proposed project. Similar to the proposed project, development under this alternative would be required to obtain verification from the water purveyor that water is available to serve the development. Since this alternative would utilize less water than the proposed project and because EMWD has stated that water supply required for the proposed project is available, it is reasonable to conclude that if this alternative was built, adequate water would be available. Therefore, impacts related to water usage and water treatment/conveyance facilities would remain less than significant with mitigation implemented, similar to the proposed project.

As identified in previously referenced Table 6.H, the Reduced Density Alternative would generate approximately 198,376 gallons of wastewater per day, which is approximately 30 percent less than that generated by the proposed project. This alternative's demands on wastewater treatment and capacity at existing wastewater treatment facilities would be reduced in magnitude. Similar to the proposed project, development under this alternative would be required to pay infrastructure fees and obtain approval from the wastewater treatment provider that would ensure there is excess capacity for the wastewater that would be generated by the proposed development. Therefore, like the proposed project, adherence to existing requirements identified by the City and EMWD would result in impacts remaining at a less than significant level.

Like the proposed project, the Reduced Density Alternative would also generate solid waste. As identified in previously referenced Table 6.J, the Reduced Density Alternative would generate 30,786 pounds of solid waste per day, which is approximately 30 percent less than what the proposed project would generate. The reduction in solid waste generated by the uses under this alternative would have a reduced demand of solid waste services and landfill capacity. Therefore, demands on solid waste services and landfill capacity would be reduced in magnitude. However, similar to the proposed project, development under the Reduced Density Alternative would be required to adhere to the provisions of the solid waste provider that would service the project site. As with the proposed project, solid waste impacts would remain less than significant.

Cumulative Impacts: The Reduced Density Alternative would contribute to the permanent conversion of farmland, but the proposed mitigation, including acquisition of an offsite agricultural conservation easement, will reduce impacts to less than significant levels, as also reduce the cumulative impacts associated with the conversion of farmland, cumulative impacts associated with farmland conversion to less than significant levels, similar to the proposed project. Although the amount of operational air pollutant emissions would be reduced in magnitude, because there are no

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feasible mitigation measures to reduce long-term air pollutant operational emissions, cumulative impacts would remain significant and unavoidable in approximately the same manner as the proposed project.

The Reduced Density Alternative would reduce traffic volumes that would occur in the project vicinity. However, the additional traffic associated with this alternative would contribute to deficient levels of service on freeway segments during the lifetime of the project. Since the City is not in control of when freeway improvements are made, impacts associated with deficient LOS on freeway segments would remain significant and unavoidable in approximately the same manner as the proposed project, until such time that the freeway improvements are installed or constructed by Caltrans. Similarly, noise generated from traffic on roadway segments within the project area may result in certain roadway segments experiencing noise levels beyond the City's noise standard. Implementation of the identified mitigation measures would reduce noise but it would not reduce noise levels to a less than significant level. Therefore, cumulative impacts associated with traffic noise levels would remain significant and unavoidable in approximately the same manner as the proposed project.

As identified in Section 4.1 of this EIR, the proposed project would result in significant and unavoidable impacts associated with scenic vistas, local scenic roads, character of the site and surroundings, and cumulatively considerable aesthetic impacts. Implementation of this alternative would result in development of the same high-cube logistics land uses, building heights and mass, but at a level approximately 70 percent of the proposed project. For this reason, and in the same manner as the proposed project, this alternative would result in significant and unavoidable impacts associated with scenic vistas, local scenic roads, character of the site and surroundings, and on a cumulatively considerable basis.

Impact Conclusions. Under the Reduced Density Alternative, development of the same high-cube logistics land uses, building heights and mass, but at a floor area level approximately 70 percent of the proposed project, would be constructed resulting in significant and unavoidable impacts associated with scenic vistas, local scenic roads, character of the site and surroundings, and on a cumulatively considerable basis in the same exact manner as the proposed project. Impacts related to short-term construction-related air quality would be the same as the proposed project, because the same amount of land would be disturbed and the same mix of equipment would be utilized. The Reduced Density Alternative would result in significant and unavoidable air quality impacts from CO, VOC, NO_x, PM₁₀, and PM_{2.5} emissions during project construction, in the same exact manner as the proposed project. Long-term operational-related air quality impacts would be incrementally reduced when compared to the project, but the emissions cannot be mitigated to below SCAQMD thresholds and would remain significant and unavoidable in approximately the same manner as the proposed project. Similarly, impacts related to short-term construction-related noise cannot be mitigated to a less than significant level and would be significant and unavoidable in the exact same manner as the proposed project. Although traffic-related noise would be reduced when compared to the project, impacts would have a similar effect on local roadway segments and would remain significant and unavoidable as there are no feasible mitigation measures that would be able to reduce impacts to a less than significant level, in approximately the same manner as the proposed project. Under this alternative, the volume of water required and the amount of wastewater and solid waste generated would be reduced in comparison to the proposed project and the decrease in the amount of logistics uses would result in a reduction of permanent jobs that would be created. Consequently, this alternative would have incrementally reduced demands on public services, recreation, and water use. Similar to the proposed project, increased property tax revenues, the payment of fees, and adherence to City development and utility requirements would reduce these impacts to less than significant levels.

Because of the decrease in vehicle trips achieved under this alternative, impacts to the operation of local roadways and intersections would be proportionally reduced from those identified for the proposed project. However, under this alternative, the future increases in traffic volumes would have

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a similar effect on freeways and interchanges, resulting in significant impacts similar to those identified for the proposed project. Since the City does not have control over when freeway improvements would occur, traffic impacts to freeways and interchanges would remain significant and unavoidable for impacts associated with freeway segments in approximately the same manner as the proposed project, as the City does not have control of when such freeway improvements can be installed or constructed by Caltrans.

In summary, the Reduced Density Alternative would incrementally reduce almost all of the project impacts by reducing the total square footage of development. However, all of the impacts identified as significant and unavoidable under the proposed project, including aesthetics, air quality, noise, and traffic would still be significant and unavoidable under this alternative.

Meets Project Objectives. As shown in Table 6.M, under this alternative, some of the project objectives are met, but not nearly to the same degree as the proposed project.

Note: The objectives outlined in this table did not correspond to the Project Objectives outlined in the Project Description of the DEIR; therefore, they are being corrected at this time.

Table 6.M: Comparison of Reduced Density Alternative to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.	Not to the same degree as the proposed project
Provide the land use designations and infrastructure plans necessary to meet current market demands and to support the City's Economic Development Action Plan.	Not to the same degree as the proposed project
Create a major logistics center with good regional and freeway access.	Not to the same degree as the proposed project
Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.	Yes
Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings.	Yes
Provide a major logistics center to accommodate a portion of the ever-expanding t rave volumes at the Ports of Los Angeles and Long Beach.	Not to the same degree as the proposed project
Create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity.	Not to the same degree as the proposed project
Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.	Not to the same degree as the proposed project
Encourage new development consistent with regional and municipal service capabilities.	Not to the same degree as the proposed project
Significantly improve the City's jobs/housing balance and help reduce unemployment within the City.	Not to the same degree as the proposed project
Provide thousands of construction job opportunities during the project's buildout phase.	Not to the same degree as the proposed project
Provide appropriate transitions or setbacks between on-site and off-site uses.	Yes

6.3.7 Alternative 2: Mixed Use A

With the intent of avoiding or substantially reducing significant impacts created by the project's traffic, air quality, and noise impacts, the City has considered Mixed Use A Alternative. This alternative

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includes development of the project site with approximately 1,410 acres of logistics warehousing (22 million square feet), 1,000 acres of light industrial uses (20 million square feet), 50 acres of retail commercial uses (500,000 square feet), 100 acres of professional or medical office uses (1.0 million square feet), and 150 acres of open space. The 1,085 acres owned by the CDFW would be designated as Open Space in the City’s General Plan, similar to the proposed project.

Impact Analysis. The following nine environmental issues would have impacts similar to those identified for the proposed project:

- Aesthetics
- Agricultural and Forestry Resources
- Cultural Resources
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Recreation

The remaining environmental issues would, in some cases, result in similar impacts, but would be different enough to be discussed separately.

Air Quality: Because the amount of land to be graded with Alternative 2 would be similar to that of the proposed project, a similar mix of equipment as the proposed project would operate during earthmoving activities. Therefore, construction emissions from the development of Alternative 2 would be similar to the proposed project, which is significant and unavoidable for CO, VOC, NO_x, and PM₁₀.

Assuming the same level of mitigation as the proposed project, there would be no cancer risks associated with this alternative since the use of new technology diesel engines do not contribute to cancer risk as described in Section 4.3.

As indicated in Table 6.N, the volume of each operational pollutant emitted during operation of this alternative would be correspondingly increased due to the substantial increase in traffic from this alternative relative to the proposed project. Like the proposed project, operational emissions for CO, VOC, NO_x, PM₁₀, and PM_{2.5} would still exceed daily SCAQMD thresholds. Application of green building design principles could reduce emissions from building operations such as heating and cooling; however, such standards and principles would not reduce CO, VOC, NO_x, PM₁₀, and PM_{2.5} emissions to below SCAQMD thresholds.

NOTE: The Alternative 2 air pollutant and greenhouse gas emissions have decreased because part of the emissions were based on a percentage of the project’s emissions (which have decreased) and the other emissions were remodeled.

Table 6.N: Alternative 2 Operational Emissions

Source	Pollutant Emissions, lbs/day					
	CO	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}
Proposed Project	1,396	593	1,097	21	1,121	304
Alternative 2	5,683	1,307	1,794	35	2,135	603
Net Change (Alternative minus project)	+4,287	+714	+697	+14	+1,014	+299
SCAQMD thresholds	550	55	55	150	150	55
Alternative 2 exceeds thresholds?	Yes	Yes	Yes	No	Yes	Yes

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment, 2015.

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The volume of operational air pollutant emissions would be increased when compared to the proposed project during operations only and impacts would remain significant and unavoidable.

Global Climate Change: This alternative would generate 6,856 metric tons of uncapped GHG emissions resulting from operation of the uses envisioned under the Mixed Use A Alternative would be approximately 10 percent higher than those of the proposed project (see Table 6.F). The Mixed Use A Alternative would generate more greenhouse gas than the proposed project; impacts associated with cumulative global climate change would be less than significant.

Noise: Under the proposed project, construction-related noise impacts were mitigated through adherence to the identified mitigation measures. However, even with the mitigation measures, construction-related noise impact within the Specific Plan area and off-site construction area would remain significant and unavoidable. Under the Mixed Use A Alternative, a similar amount of land would be disturbed; therefore, noise impacts associated with the construction of this alternative would be similar to those identified under the proposed project. With the implementation of mitigation identified for the proposed project, the short-term construction-related noise impacts associated with this alternative would still remain significant and unavoidable as construction noise is not able to be reduced to below noise levels less than 60 dBA (L_{eq}). As with the proposed project, the noise generated under the Mixed Use A Alternative would be generated during loading/unloading, trash compacting, truck movements on roadways, and parking lot activities. The operation-related noise impacts associated with this alternative would remain less than significant with implementation of the mitigation measures, as identified for the proposed project.

The increase in project-related traffic under this alternative would result in an incremental increase in long-term traffic noise due to an increase of traffic trips to the project site. Under the proposed project, the increase in future traffic noise along certain local roadway segments would increase beyond the threshold of perception resulting in the need for mitigation. However, as stated in the EIR, there are no feasible mitigation measures to reduce noise levels to below appropriate levels. Under this alternative, future increases in traffic-related noise would have a similar effect on local roadway segments. When compared to the proposed project, this alternative's contribution to future traffic noise would be increased, thereby increasing overall mobile source noise impacts within the area. It is anticipated that roadway noise along certain roadway segments would remain significant and unavoidable.

Population and Housing: The Mixed Use A Alternative would result in the development of 22 million square feet of logistics warehousing, 20 million square feet of light industrial uses, half a million square feet of retail commercial uses, one million square feet of professional/medical office uses, and 150 acres of open space. Utilizing an employment factor of one employee for every 1,667 square feet of logistics space,¹ the logistics warehousing component of the Mixed Use A Alternative is anticipated to generate approximately 13,197 jobs.² Utilizing the same employment factor of one employee for every 1,667 square feet of light industrial uses, the light industrial component of the Mixed Use A Alternative is anticipated to generate approximately 11,998 jobs.³ Utilizing employment factors of one employee for every 628 square feet of commercial use and one employee for every 481 square feet of office use,⁴ this alternative would additionally create up to 2,875 jobs (796 retail jobs⁵ and 2,079

¹ Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California, David Taussig & Associates, Inc., September 2014.

² 1 employee/1,667 square feet of logistics uses × 22 million square feet of logistics use = 13,197 logistics jobs.

³ 1 employee/1,667 square feet of light industrial uses × 20 million square feet of light industrial use = 11,998 light industrial jobs.

⁴ *Table II-B Average Employees Per Acre*, Southern California Association of Governments Employment Density Study, The Natelson Company, October 31, 2001.

⁵ 1 employee/628 square feet of commercial uses × 500,000 square feet of commercial uses = 796 retail jobs.

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office jobs).¹ Many of the logistics warehousing, light industrial, and retail jobs are likely to be filled by persons already residing in the area.

However, unlike logistics, light industrial, and retail jobs, which can often be filled by most working adults, professional/medical office jobs under this alternative may require the employment of persons in specialized fields, which may not include persons already living in the area. Persons from outside of the area may be required to relocate to Moreno Valley to fill positions in the office space, resulting in an incremental population increase in the City. When this alternative is compared to the proposed project, the number of new residents would be higher than that identified for the proposed project. Under this alternative, up to approximately 28,070 jobs could be created. The number of new jobs in the City would be 17 percent greater than the proposed project (24,000 potential jobs). However, similar to the proposed project, impacts related to population and housing would remain less than significant as this alternative would continue the existing development trend envisioned by the City.

Public Services: As discussed above, the Mixed Use A Alternative could result in an incremental population increase within the City. Because of the increased amount of office development that would occur within the project limits, demands on schools, parks, other public facilities, law enforcement, and fire protection services would be greater in magnitude than what was identified for the proposed project. However, similar to the proposed project, development under this alternative would result in higher property tax revenues and payment of development impact fees for schools, police services, and fire services. The payment of development impact fees would offset any impacts to these public services that may result from the development of this alternative. Therefore, when compared to the proposed project, impacts associated with public services would remain less than significant with the payment of development impact fees.

Traffic: As identified in previously referenced Table 6.G, this alternative would generate approximately 208,988 total traffic trips. In comparison to the proposed project, this alternative would almost triple total traffic trips. With such an increase in traffic, an increase in volumes on nearby roads and intersections would be greater in magnitude when compared to the proposed project. Impacts to LOS at nearby intersections and roadway segments would occur under the Mixed Use A Alternative to an even greater degree than under the proposed project, and would require even more extensive mitigation. The addition of traffic volumes associated with this alternative could result in deficient LOS at many more intersections in the project vicinity during the lifetime of the development. While significant traffic impacts may occur under this alternative, these impacts would be mitigated in a manner similar to those of the proposed project. Even if mitigation measures were identified for all these intersections, certain roadway improvements would not be under the jurisdiction of the City and cannot be guaranteed to be in place when development under this alternative would become operational. Therefore, as identified for the proposed project, traffic-related impacts would remain significant and unavoidable under the Mixed Use A Alternative.

Utilities and Service Systems: Like the proposed project, development under the Mixed Use A Alternative would connect to existing utility infrastructure subject to the terms and conditions of the City and EMWD. As indicated in previously identified Table 6.H, this alternative would generate approximately 1,830,000 gallons of wastewater per day, which is over six times what the proposed project would generate (286,459 gallons of wastewater per day). When compared to the proposed project, wastewater treatment demand would be increased in magnitude as more wastewater would be generated under this alternative. However, like the proposed project, adherence to existing requirements identified by the City and EMWD may result in impacts remaining at a less than significant level.

¹ 1 employee/481 square feet of office uses × 1 million square feet of office uses = 2,079 office jobs.

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The development of the warehousing, light industrial, commercial, and office uses associated with this alternative would also require the installation of water supply infrastructure to serve the project site. As previously indicated in Table 6.I, the Mixed Use A Alternative would require approximately 3,420,000 gallons of water per day, which is almost twice as much as would be required by the proposed project (1,761,260 gallons of water per day). When compared to the proposed project, water usage demands would be increased. However, similar to the proposed project, development under this alternative would be required to obtain verification from the water purveyor that water is available to serve the development. Therefore, impacts related to water usage and water treatment/ce facilities would remain less than significant when compared to the proposed project.

Like the proposed project, the Mixed Use A Alternative would also generate solid waste. As previously identified in Table 6.J, this alternative would generate 481,344 pounds of solid waste per day, which is over thirteen times as much as the proposed project would generate (37,016 pounds of solid waste per day). Therefore, demands on solid waste services and landfill capacity would be increased in magnitude. Similar to the proposed project, development under the Mixed Use A Alternative would be required to adhere to the provisions of the solid waste provider that would service the project site. As with the proposed project, solid waste impacts under this alternative would remain less than significant.

Cumulative Impacts: Similar to the proposed project, this alternative would contribute toward the permanent conversion of farmland, long-term operational air pollutant emissions, and increased traffic operations on local roadways and at local intersections. The amount of operational air pollutant emissions and traffic would be increased in magnitude and there are no mitigation measures that would reduce long-term air quality operational impacts to below SCAQMD thresholds. Likewise, there are no mitigation measures that would reduce impacts associated with increased traffic in the area. Therefore, cumulative impacts associated with long-term air quality and long-term traffic would remain significant and unavoidable. Similarly, noise generated from traffic on roadway segments within the project area may result in certain roadway segments experiencing noise levels beyond the City's noise standard. Implementation of the identified mitigation measures would reduce noise but it would not reduce noise levels to a less than significant level. Therefore, cumulative impacts associated with traffic noise levels would remain significant and unavoidable. This alternative would also require the development of the project site. The revised EIR contains mitigation (acquisition of an offsite agricultural conservation easement) that would reduce the cumulative impacts associated with the conversion of Unique Farmland, cumulative impacts associated with farmland conversion to less than significant levels.

Impact Conclusions. Under this alternative, impacts related to short-term construction-related air quality and noise impacts would remain significant and unavoidable, similar to the proposed project. Long-term air quality operational impacts under this alternative would be increased in magnitude, remain significant and unavoidable, and would result in similar conditions as identified for the proposed project. The Mixed Use A Alternative would decrease the amount of logistics warehousing and would add light industrial, commercial, and office uses that would generate more permanent and more varied jobs than the proposed project, but some uses may require skilled workers who are not current residents of the City. The office uses proposed under this alternative may incrementally increase the total number of people that would be added to the City's population and could have greater demands on public services and recreation. However, the increased property tax revenues, payment of fees, and dedication of parkland would reduce these impacts to a less than significant level. This alternative would increase the amount of wastewater generated, increase the amount of potable water required, and increase the amount of solid waste produced on site. Similar to the proposed project, adherence to utility requirements would reduce these impacts to less than significant levels. Because of the increase in vehicle trips resulting from this alternative, impacts to the operation of local roadways and intersections would be proportionally increased from the proposed project and remain significant and unavoidable.

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Because of the increase in vehicle trips under this alternative, impacts to the operation of local roadways and intersections would be proportionally increased from what was identified for the proposed project. Long-term traffic impacts would remain significant and unavoidable for impacts associated with freeway segments as the City does not have control of when such freeway improvements would occur. Similarly, traffic-related noise would be increased in magnitude and cannot be mitigated to a less than significant level in a manner similar to the proposed project.

In summary, the Mixed Use A Alternative would increase employment opportunities but would substantially increase traffic, noise, and air quality impacts. All the impacts identified as significant under the proposed project, including air quality health risks, would still be significant under this alternative.

Meets Project Objectives. Under this alternative, four of the proposed project objectives are not met as shown in Table 6.O.

Note: The objectives outlined in this table did not correspond to the Project Objectives outlined in the Project Description of the DEIR; therefore, they are being corrected at this time.

Table 6.O: Comparison of the Mixed Use A Alternative to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.	Yes
Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan.	Yes
Create a major logistics center with good regional and freeway access.	No
Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.	Yes
Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings.	Yes
Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach	No
Create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity.	No
Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.	No
Encourage new development consistent with regional and municipal service capabilities.	Yes
Significantly improve the City's jobs/housing balance and help reduce unemployment within the City.	Yes
Provide thousands of construction job opportunities during the project's buildout phase.	Yes
Provide appropriate transitions or setbacks between on-site and off-site uses.	Yes

6.3.8 Alternative 3: Mixed Use B

This alternative would develop the project site similar to the land use plan of the Moreno Highlands Specific Plan (MHSP) but with 10 million square feet of logistics warehousing on the 603 acres proposed for business, retail, institutional, and other uses under the MHSP. The 1,085 acres owned by the CDFW would be designated as Open Space in the City's General Plan, similar to the proposed project.

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Impact Analysis. Many of the environmental impacts of this alternative would be equivalent to those identified for the No Project/Existing General Plan Alternative, the main differences being traffic, health risks, and greenhouse gas emissions.

Air Quality: Alternative 3 would require site grading and construction similar to that required of the proposed project. As identified in Section 4.3 of this EIR, short-term construction emission impacts associated with construction activities on the project site were significant and unavoidable for all criteria pollutants with the exception of SO_x. Since Alternative 3 would require that the same amount of land be graded, it would require similar grading and construction activities on site. Therefore, it is reasonable to anticipate that short-term construction emission impacts would also be significant and unavoidable for all criteria pollutants, with the exception of PM_{2.5} and SO_x, under this alternative. Air quality impacts associated with the remaining criteria pollutants would be significant and unavoidable with this alternative, similar to what was identified for the proposed project.

Under Alternative 3, the site would be developed at the same residential density and intensity as the MHSP but would have 10 million square feet of logistics warehousing on 603 acres instead of the mixed non-residential uses proposed under the MHSP. Based on these land uses, Alternative 3 would generate approximately 78,985 daily vehicle trips (see Table 6.G) compared to 69,542 trips from the proposed project (a 14% increase).

NOTE: Alternative 3 air pollutant and greenhouse gas emissions have decreased because part of the emissions were based on a percentage of the project's emissions (which have decreased) and the other emissions were remodeled.

Table 6.P: Alternative 3 Operational Emissions

Source	Pollutant Emissions, lbs/day					
	CO	VOC	NOx	SOx	PM ₁₀	PM _{2.5}
Proposed Project	1,396	593	1,097	21	1,121	304
Alternative 3	2,912	569	762	15	960	278
Net Change (Alternative minus project)	+1,516	-24	-335	-6	-161	-26
SCAQMD thresholds	550	55	55	150	150	55
Alternative 3 exceeds thresholds?	Yes	Yes	Yes	No	Yes	Yes

Source: Air Quality, Greenhouse Gas, and Health Risk Assessment, 2015.

The volume of each operational pollutant emitted during operation of this alternative would be incrementally increased due to the proposed mix of land uses. Therefore, this alternative would also have significant and unavoidable impacts on local air quality. The long-term air quality impacts resulting from this alternative would still contribute criteria pollutants to an air basin that is in nonattainment for these criteria pollutants, similar to the proposed project. As identified in previously referenced Table 6.P, long-term operational air pollutant emissions associated with Alternative 3 would exceed SCAQMD emissions thresholds for all criteria pollutants, with the exception of SO_x.

Assuming the same level of mitigation as the proposed project, there would be no cancer risks associated with this alternative since the use of new technology diesel engines do not contribute to cancer risk as described in Section 4.3.

When compared with the proposed project, air quality impacts associated with Alternative 3 would be mixed in that criteria pollutants would be higher but diesel particulate matter and truck-related emissions would be less, and potential health risks would be shifted from existing to future residents; more residents could be exposed to health risks. Similar to the proposed project, the generation of

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these emissions would still result in a cumulative contribution of air pollutants in a nonattainment basin; therefore, impacts remain significant and unavoidable.

Global Climate Change: GHG emissions associated with Alternative 3 are substantially decreased. As identified in previously referenced Table 6.F, Alternative 3 would generate uncapped emissions of 2,925 metric tons of carbon dioxide equivalents, which is approximately half (53%) of that identified for the proposed project.

Noise: Under the proposed project, construction-related noise impacts were mitigated through adherence to the identified mitigation measures. However, even with the mitigation measures, construction-related noise impact within the Specific Plan area and off-site construction area would remain significant and unavoidable. Under the Mixed Use B Alternative, a similar amount of land would be disturbed; therefore, noise impacts associated with the construction of this alternative would be similar to those identified under the proposed project. With the implementation of mitigation identified for the proposed project, the short-term construction-related noise impacts associated with this alternative would still remain significant and unavoidable as construction noise cannot be reduced to noise levels less than 60 dBA (L_{eq}). As with the proposed project, the noise generated under the Mixed Use B Alternative would be generated during resident trips to and from the project, as well as non-residential loading/unloading, trash compacting, truck movements on roadways, and parking lot activities. The operational-related noise impacts associated with this alternative would be significant and adverse, even with implementation of the mitigation measures, similar to the proposed project.

Population and Housing: The Mixed Use B Alternative would result in the development of 6,532 residential units on 1,146 acres, plus 10 million square feet of logistics warehousing and 150 acres of open space. Utilizing an employment factor of one employee for every 1,667 square feet of logistics space,¹ the logistics warehousing component of the Mixed Use B Alternative is anticipated to generate approximately 6,000 jobs.² Utilizing a household size of 3.8 persons per unit, it is estimated this alternative would generate 24,821 new residents in the City as well. The number of new jobs in the City would be 82 percent less than the proposed project (24,000 potential jobs). This alternative would eventually have a jobs/housing ratio of 0.22, which is much lower than the existing job/housing ratio of the City. Therefore, this alternative would have substantially greater impacts related to population and housing compared to the proposed project.

Public Services: As discussed above, the Mixed Use B Alternative could result in a substantial population increase within the City. Because of the increased population, demands on schools, parks, other public facilities, law enforcement, and fire protection services would be greater in magnitude than what was identified for the proposed project. Similar to the proposed project, development under this alternative would provide increased property tax revenues and payment of development impact fees for schools, police, fire, and recreation services. The payment of development impact fees would offset any impacts to these public services that may result from the development of this alternative. Therefore, when compared to the proposed project, impacts associated with public services would remain less than significant with the payment of development impact fees.

Traffic: As identified in previously referenced Table 6.G, this alternative would generate approximately 78,985 total traffic trips, which is approximately 12 percent more than the proposed project. This would incrementally increase traffic and impacts to LOS at nearby intersections and roadway. The addition of traffic associated with this alternative could result in deficient LOS at more intersections in the project vicinity during the lifetime of the development. While significant traffic impacts may occur under this alternative, these impacts would be mitigated in a manner similar to those of the proposed project. Even if mitigation measures were identified for all these intersections,

¹ Fiscal and Economic Impact Study World Logistics Center Moreno Valley, California (David Taussig & Associates, Inc., September 2014).

² 1 employee/1,667 square feet of logistics uses × 10 million square feet of logistics use = 5,999 logistics jobs.

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certain roadway improvements would not be under the jurisdiction of the City and cannot be guaranteed to be in place when development under this alternative would become operational. Therefore, as identified for the proposed project, traffic-related impacts would remain significant and unavoidable under the Mixed Use B Alternative.

Utilities and Service Systems: Like the proposed project, development under the Mixed Use B Alternative would connect to existing utility infrastructure subject to the terms and conditions of the City and EMWD. As indicated in previously identified Table 6.H, this alternative would generate approximately 1,681,656 gallons of wastewater per day, which is more than a six-fold increase to what the proposed project would generate (286,459 gallons of wastewater per day). When compared to the proposed project, wastewater treatment demand would be substantially increased under this alternative, but adherence to existing requirements identified by the City and EMWD would likely result in less than significant impacts with planned expansion of wastewater treatment capacity.

The development of logistics rather than commercial and other non-residential uses under the MHSP would require the installation of water supply infrastructure to serve the project site. As previously indicated in Table 6.I, the Mixed Use B Alternative would require approximately 5,196,801 gallons of water per day, which is over three times what would be required by the proposed project (1,761,2601 gallons of water per day). When compared to the proposed project, water usage demands would be substantially increased. Similar to the proposed project, development under this alternative would be required to obtain verification from the water purveyor that water is available to serve the development. Therefore, impacts related to water usage and water treatment/conveyance facilities are assumed to remain at less than significant levels similar to the proposed project.

Like the proposed project, the Mixed Use B Alternative would also generate solid waste. As previously identified in Table 6.J, this alternative would generate 116,800 tons of solid waste per year, which is almost three times more than what the proposed project would generate (37,016 tons of solid waste per year). Therefore, demands on solid waste services and landfill capacity would be substantially increased. Similar to the proposed project, development under the Mixed Use B Alternative would be required to adhere to the provisions of the solid waste provider that would service the project site. As with the proposed project, solid waste impacts under this alternative would remain less than significant.

Cumulative Impacts: Similar to the proposed project, this alternative would contribute toward the permanent conversion of farmland, air quality operational emissions, short-term and long-term noise impacts, and increased traffic operations on local roadways and at local intersections. This alternative would have slightly more traffic and operational emissions. Because there are no feasible mitigation measures to reduce the cumulative impacts associated with long-term operational air pollutant emissions, short-term and long-term noise, and increased traffic, these impacts would remain significant and unavoidable. Alternative 3 would also require the development of the project site. Since there is no feasible mitigation that would reduce the cumulative impacts associated with the conversion of farmland, cumulative impacts associated with farmland conversion would remain significant and unavoidable.

Impact Conclusions. Under Alternative 3, impacts related to short-term construction-related air quality would be similar to the proposed project as the same amount of land would be disturbed and the same mix of equipment would be utilized. Long-term operational-related carbon monoxide emissions would be higher than the proposed project and would remain significant and unavoidable. Like the proposed project, long-term air quality relative to criteria pollutants would still be significant, with the exception of SO_x. Assuming the same level of mitigation as the proposed project, there would be no cancer risks associated with this alternative since the use of new technology diesel engines do not contribute to cancer risk as described in Section 4.3.

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The development of Alternative 3 would have increased demands on public services and recreation facilities to serve future residential uses. However, increased property tax revenues, payment of development impact fees, and adherence to development requirements would reduce these impacts to a less than significant level. Water supply availability is expected to be available as water demand is expected to be the same. Water demand was determined to be available for the proposed project. There would be an increase in vehicle trips under this alternative, and impacts to the operation of local roadways and intersections would be similarly increased compared to that identified for the proposed project; therefore, long-term traffic impacts would remain significant and unavoidable. Development of this alternative would provide new employment opportunities and homes for residents of Moreno Valley, but new employment opportunities would be significantly reduced compared to the proposed project.

In summary, the Mixed Use B Alternative would incrementally increase traffic and not improve the City’s jobs/housing balance over the long-term. However, this is the only alternative that would reduce a significant impact of the project (aesthetics – views) by substantially reducing the amount of warehousing on the site and replacing it with residential uses. Views of the area would still transition from vacant agricultural land to suburban development, but it would have a residential appearance compared to the proposed project. All the other impacts identified as significant under the proposed project, including likely air quality health risks, would still be significant under this alternative.

Meets Project Objectives. This alternative would not meet most of the objectives of the project related to employment and land use, as shown in Table 6.Q, and would not establish a major regional logistics center in this portion of the City.

NOTE: The objectives outlined in this table did not correspond to the Project Objectives outlined in the Project Description of the DEIR; therefore, they are being corrected at this time.

Table 6.Q: Comparison of Alternative 3 to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.	No
Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City’s Economic Development Action Plan.	No
Create a major logistics center with good regional and freeway access.	No
Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.	Yes
Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings.	No
Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach.	No
Create a project that will provide a balanced approach to the City’s fiscal viability, economic expansion, and environmental integrity.	No
Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.	No
Encourage new development consistent with regional and municipal service capabilities.	No
Significantly improve the City’s jobs/housing balance and help reduce unemployment within the City.	Yes

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Table 6.Q: Comparison of Alternative 3 to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Provide thousands of construction job opportunities during the project's buildout.	No
Provide appropriate transitions or setbacks between on-site and off-site uses.	Yes

6.3.9 Alternative Sites Analysis

NOTE: The following changes have been made due to revision to the Specific Plan project size.

This alternative examines different sites in the surrounding region to determine if an alternative location would reduce or eliminate one or more significant impacts of the project. This analysis must be based on feasible sites that could realistically support the proposed project (i.e., a contiguous 2,610-acre site for 40.6 million square feet of high-cube and light logistics warehouse uses as envisioned by the WLC Specific Plan). The surrounding jurisdictions were contacted to identify potential alternative sites for the proposed project. Figure 6.1 shows the locations of the various jurisdictions that were contacted and/or analyzed in this evaluation and Table 6.R presents the results of that analysis.

Table 6.R indicates that there are no feasible alternative sites in the surrounding or nearby jurisdictions that could support the proposed project (i.e., that have enough vacant land zoned or available for logistics warehousing with good freeway and/or rail access). Therefore, none of these sites will be evaluated further.

Table 6.R: Evaluation of Potential Alternative Sites

Jurisdiction/Map Reference*	Contact/Results
City of Moreno Valley	John Terell, the City's former Community Development Director, indicated there are no sites available within the City that have nearly that amount of vacant land planned or designated for industrial-related uses, which is why the WLC project is being proposed on the current site as this is the largest available vacant land left in the City (personal communication, December 2012).
City of Banning	Zai Abu Bakar, Community Development Director, indicated that the City does not have any vacant industrial property that large (personal communication, November 21, 2012). The City of Banning has a number of much smaller parcels (50–100 acres) zoned for industrial use along the I-10 Freeway corridor, but these are not contiguous and are under multiple ownerships. Therefore, there is no alternative site for the proposed project within the City of Banning.
City of Beaumont	Rebecca Deming, Director of Planning, indicated "the City does have some vacant industrial zoning and Specific Plan Zoning for industrial areas along the 60 freeway" (personal communication, November 26, 2012). A review of the City's online mapping indicates the following three potential sites of contiguous vacant land with freeway access that could support industrial uses: A. South of SR-60/East of SR-79: Site consists of 319 acres planned for general/community commercial and industrial uses, but with scattered rural residential uses adjacent to many of the vacant parcels. B. North of SR-60/West of I-10/South of Oak Valley Parkway: Site consists of approximately 463 acres planned for a variety of residential uses under the Oak Valley Specific Plan. C. South of SR-60/West of I-10/North of West 4 th Street: Site includes 193 acres just

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Table 6.R: Evaluation of Potential Alternative Sites

Jurisdiction/Map Reference*	Contact/Results
	<p>west of new commercial center and planned for “urban village overlay” with industrial along the freeway.</p> <p>Even the largest site (B) is less than 20 percent of the size of the WLC project site in Moreno Valley, and even all together the three sites total 974 acres which is 36 percent of the WLC project site. None of the sites is owned by the developer; Site B is under single ownership, while the other two are under multiple ownership. Based on this information, there are no feasible alternatives sites in the City of Beaumont for the proposed project.</p>
City of Calimesa	<p>Gus Romo, Community Development Director, was contacted and indicated there are not 2,600 acres designated or that have the potential to be zoned for warehouses in Calimesa (personal communication, November 21, 2012). Therefore, there is no alternative site for the proposed project within the City of Calimesa.</p>
City of Menifee	<p>Patti Nahill, contract City Planner, indicated that there was no place in the City with 2,600 vacant acres available for industrial uses (personal communication, November 27, 2012). The City was incorporated on October 1, 2008, and is still working on its General Plan, so the applicable zoning would be Industrial Park (IP). There are three areas in the City with vacant land that could support industrial uses:</p> <ul style="list-style-type: none"> A. East of I-215 North of Scott Road: Approximately 280 acres with suburban and rural residential uses adjacent to the north and south, and an approved Specific Plan (140 acres) to the east. These areas have multiple owners. B. West of I-215 North of Scott Road: Approximately 600 acres with rural residential to the north, west, and south. This area has multiple owners. C. North Menifee Specific Plan: This area is only 120 acres and the current land use designation is Specific Plan, but the underlying zoning was industrial. This area is under single ownership. <p>Even the largest area (A) is only 22 percent of the size of the WLC project site in Moreno Valley, and even all together the three areas only total 1,000 acres which is 37 percent of the WLC project site. None of the sites is owned by the developer; Area C is under single ownership, while the other two areas are under multiple ownership. Based on this information, there are no feasible alternative sites available in the City of Menifee for the proposed project.</p>
City of Perris	<p>According to the City’s website (www.cityofperris.org), the Perris Valley Commerce Center Specific Plan (adopted January 2012) east of I-215 has 1,866 total acres designated for light industrial uses, but some of this area is already developed or planned/approved for development. If this entire area were dedicated to high cube logistics warehousing, it would represent about two-thirds of the land within the proposed WLC Specific Plan. This land is also under ownership of hundreds of individual owners, and the vacant land is not in large contiguous blocks. Therefore, there is no feasible alternative site for the proposed project within the City of Perris.</p>
City of Riverside	<p>Steve Hayes, City Planner, indicated there were no sites close to the required size within the City limits. The only large sites he was aware of were less than 50 acres each and not contiguous with each other (personal communication, November 26, 2012). Therefore, there is no feasible alternative site for the proposed project within the City of Riverside.</p>
City of San Jacinto	<p>Asher Hartel, former Planning Director (retired), said the City of San Jacinto did not have the required amount of vacant land available zoned for industrial use in the City, and there are no freeways or rail service immediately available to the City. He did say the City’s “Gateway” area in the northwestern portion of the City, along Ramona Expressway, had approximately 1,700 acres and is mostly vacant, but the property is designated for a mix of residential, commercial, and business park uses in the General Plan, and any non-residential uses would have to be high employment generators (personal communication, November 27, 2012). Therefore, there is no feasible alternative site for the proposed project within the City of San Jacinto.</p>

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Table 6.R: Evaluation of Potential Alternative Sites

Jurisdiction/Map Reference*	Contact/Results
County of Riverside	<p>Frank Coyle, former Deputy Director, Advanced Planning Division Riverside County Planning Department, suggested the County’s GIS Department could identify all vacant unincorporated land zoned Light Industrial or Business Park along the I-215 corridor south of Moreno Valley to the City of Perris (personal communication, November 21, 2012). Larry Ross with the County’s GIS Department said its research shows a total of 1,280 acres of vacant land designated for light industrial or business park uses where warehousing would be appropriate (see Figure 6.1)(personal communication, November 26, 2012 and data/mapping info sent November 29, 2012). This land constitutes hundreds of parcels under separate ownerships distributed along the west side of I-215 from Nandina Avenue south to Nuevo Road. This “corridor” land is spread out up to a half mile away from the freeway and is not in large contiguous blocks, and it is adjacent to many rural residential parcels and uses. In addition, it is less than half the size needed for a similar amount of logistics warehousing development as under the proposed project. For these reasons, it would be infeasible to consolidate and propose development of industrial-zoned unincorporated land along this portion of I-215.</p> <p>In addition to the I-215 corridor, the “Villages of Lakeview” property located south of Mystic Lake off of Ramona Expressway is at least one additional potential site in the general project area that has sufficient acreage to accommodate the WLC project. This property has already been proposed for a variety of residential uses (11,350 units on 2,800 acres) but the EIR for that project was successfully challenged in court this year (Riverside County EIR 471). While the property is large enough, it is already proposed for residential development so it would be infeasible to use this property to support development equivalent to the proposed project.</p> <p>Although it is relatively far from the project area (approximately 22 miles to the west-northwest along the east side of I-15 south of SR-60), the Mira Loma area of the County supports a variety of large warehouses and has rail service available, so it is a potential location for additional logistics warehouses. The Jurupa Area Plan indicates that warehouse uses are allowed only in the area bounded by San Sevaine Channel from Philadelphia Street southerly to Galena Street on the east, Galena Street from the San Sevaine Channel to Riverside Drive, then Riverside Drive westerly to Milliken Avenue, then Milliken Avenue north to Philadelphia Street on the west, and Philadelphia Street easterly to the San Sevaine Channel on the north. A visual inspection of aerial photographs of the Mira Loma area indicates the largest individual vacant parcel or group of adjacent vacant parcels in this area occupies approximately 800 acres, most of which is currently being used for agriculture (i.e., vineyards)(east of I-15 on both sides of Bellegrave Avenue). Otherwise, there are no vacant parcels of more than 100 acres in size in this area (not shown in Figure 6.1).</p>
City of Jurupa Valley (not shown in Figure 6.1)	<p>The newly incorporated City of Jurupa Valley, located south of SR-60 just west of the City of Riverside, also has vacant industrial-zoned land available for warehousing, but all currently vacant parcels are 50 acres or less in size and not contiguous as to be able to form a parcel nearly large enough to support the proposed project (Ernest Perea, former City contract planner, personal communication, January 4, 2013).</p>
March Joint Powers Authority	<p>The March JPA website (www.marchjpa.com) indicates there is a total of approximately 750 acres of developable land west of I-215, north of Van Buren Boulevard and south of Alessandro Boulevard within the MJPA. At present, this land is planned for a mixture of business park, commercial, industrial, public facilities, and open space uses. Even if all this land was committed to logistics warehousing, it would only represent 28% of the WLC project site. Therefore, an alternative site for the proposed project on March JPA property is infeasible.</p>

* See Figure 6.1

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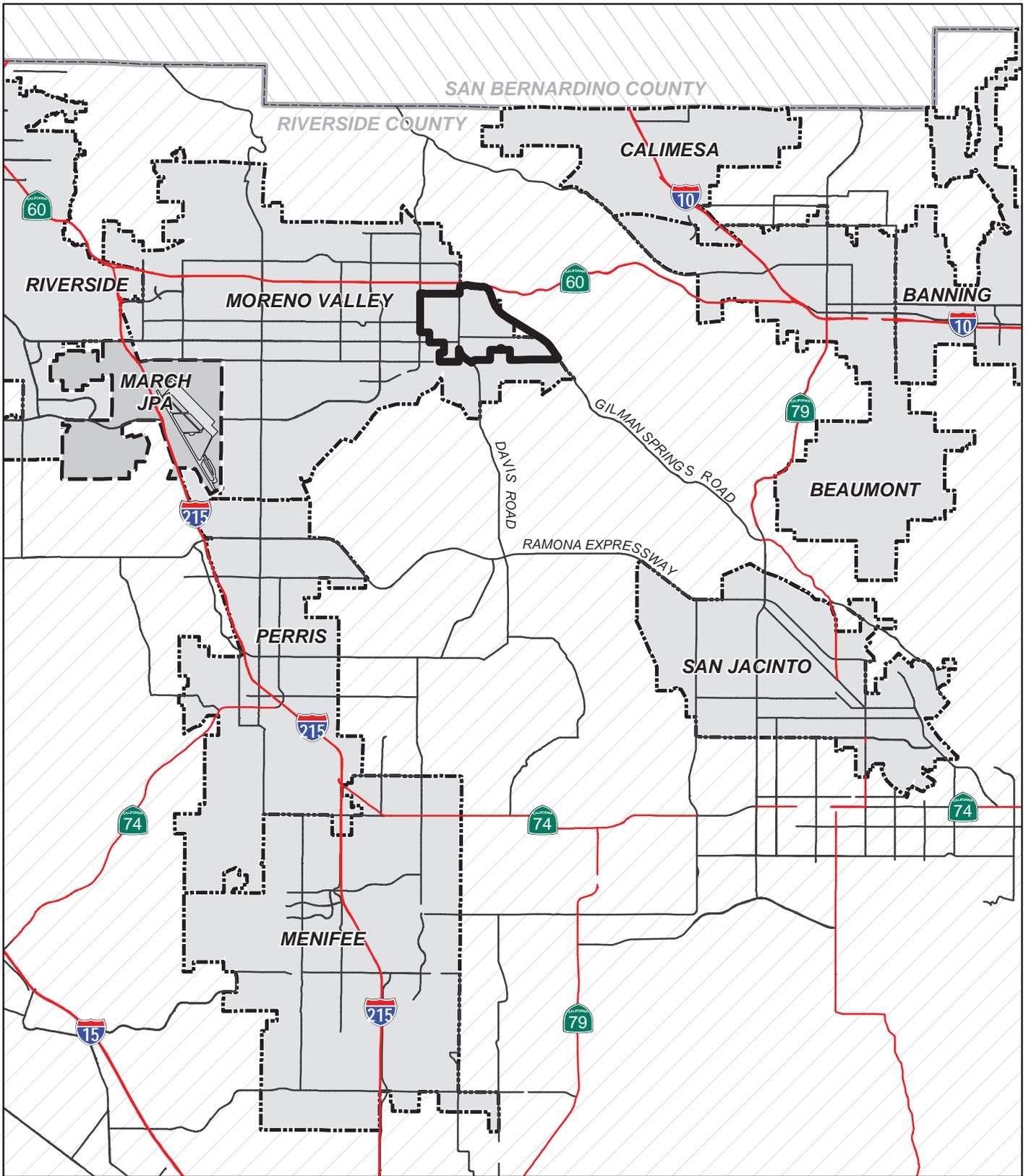
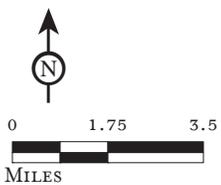


FIGURE 6.1

LSA



-  Project Boundary
-  Cities
-  Riverside County
-  San Bernardino County

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Alternative Sites Analysis

SOURCE: Riverside County, 2011.

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6.4 COMPARISON OF PROJECT ALTERNATIVES

The following discussion compares the impacts of each alternative with the impacts of the proposed project, as detailed in Sections 4.1 through 4.16 of this EIR. Table 6.S compares the impacts of the alternatives with those of the proposed project. This table identifies whether the alternative results in (1) a reduction of the impact; (2) a greater impact than the project; or (3) the same impact as the project.

Table 6.S: Comparison of Alternatives to the Proposed Project

Environmental Issue	Proposed Project	No Project	No Project	Alt. 1	Alt. 2	Alt. 3
		No Build	Existing General Plan	Reduced Density	Mixed Use A	Mixed Use B
Aesthetics	SIG	NI	←LTS	=	=	←LTS
Agricultural and Forest Resources	LTS/mit	NI	=	=	=	=
Air Quality	SIG	NI	SIG	←SIG	→SIG/+	SIG
Biological Resources	LTS/mit	NI	=	=	=	=
Cultural Resources	LTS/mit	NI	=	=	=	=
Geology and Soils	LTS/mit	NI	=	=	=	=
Global Climate Change	LTS/mit	NI	LTS	LTS/mit	LTS/mit	LTS/mit
Hazards and Hazardous Materials	LTS/mit	NI	=	=	=	=
Hydrology and Water Quality	LTS/mit	NI	=	=	=	=
Land Use and Planning	SIG	NI	LTS	=	=	=
Mineral Resources	NI	=	=	=	=	=
Noise	SIG	NI	←SIG	←SIG	←SIG	←SIG
Population, Housing, and Employment	LTS	NI	+	=	=	+
Public Services (police, fire, schools, parks)	LTS/mit	NI	=	=	=	=
Transportation and Traffic	SIG	NI	→SIG	←SIG	→SIG+	→SIG
Utilities and Service Systems (water, wastewater, etc.)	LTS/mit	NI	=	=	=	=

Proposed Project

- NI: No Impact
- LTS: Less than Significant Impact
- LTS/mit: Less than Significant Impact with Mitigation
- SIG: Significant Impact with or without Mitigation

Project Alternatives

- = Compared with the proposed project, no change in the significance of impact will occur.
- Compared with the proposed project, the significance of the impact is increased.
- ← Compared with the proposed project, the significance of the impact is reduced.
- + Compared with the proposed project, a new impact has been identified.
- ←SIG Compared with the proposed project, the volume or extent of the impact is reduced, yet still significant.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As detailed above in Table 6.S, the No Project/Existing General Plan Alternative has mixed impacts relative to the proposed project; it reduces aesthetic impacts to less than significant levels but worsens the jobs/housing ratio by introducing more housing than employment-generating uses. The

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Reduced Density Alternative incrementally reduces a number of impacts of the proposed project (e.g., traffic, air quality, and noise) but cannot reduce them to less than significant levels even with mitigation. The Mixed Use A Alternative substantially increases traffic and related impacts compared to the project impacts, but it does not create any additional significant impacts. The Mixed Use B Alternative would incrementally increase traffic and would not improve the jobs/housing balance. In addition, this alternative would also worsen the jobs/housing ratio of the City by allowing the construction of many more homes than job-creating land uses. Regarding air quality impacts (criteria pollutants), development of any land uses would likely exceed SCAQMD thresholds mainly due to the size of the proposed project site.

The *CEQA Guidelines* (Section 15126.6 (e)[2]) requires that an environmentally superior alternative be identified in the EIR. Based on the analysis in this section and the summary contained in Table 6.S, Alternative 1 – Reduced Density – is the only alternative that reduces traffic, air quality, and related impacts by reducing the total square footage of warehousing by approximately 30 percent. Alternative 3—Mixed Use B—is the only alternative that would reduce a significant impact of the proposed project (i.e., aesthetics – views). However, it would worsen the jobs/housing balance of the City over the long term. For these reasons, Alternative 1 – Reduced Density —has been deemed to be environmentally superior to the proposed project. However, none of the alternatives achieves the objectives of the project to nearly the same degree as the proposed project.

Table 6.T compares Alternative 1 to the project objectives and indicates that Alternative 1 does not meet most of the major goals of the proposed project mainly because of the reduced total square footage by 30 percent, which also reduces the amount of new employment and property tax revenues generated to the City.

NOTE: The objectives outlined in this table did not correspond to the Project Objectives outlined in the Project Description of the DEIR; therefore, they are being corrected at this time. In addition, some numerical changes result from the changes to the Specific Plan area.

Table 6.T: Comparison of the Environmentally Superior Alternative to the Project Objectives

Project Objectives	Degree to Which Alternative 1 Satisfies the Project Objectives
Create substantial employment opportunities for the citizens of Moreno Valley and surrounding communities.	Not to the Same Degree as the Proposed Project. This alternative would provide only 16,797 new employees compared to 24,000 from the proposed project (30% less).
Provide the land use designation and infrastructure plan necessary to meet current market demands and to support the City's Economic Development Action Plan.	Not to the Same Degree as the Proposed Project. The alternative introduces substantially less employment-generating uses on the site which is not consistent with the City's Economic Strategic Plan.
Create a major logistics center with good regional and freeway access.	Not to the Same Degree as the Proposed Project. The alternative would allow 28 MSF of logistics warehousing near the SR-60 Freeway but it would less attractive as a major regional logistics center compared to the proposed project.
Establish design standards and development guidelines to ensure a consistent and attractive appearance throughout the entire project.	Meets Objective. Development of the project area under this alternative would most likely proceed under some form of specific plan, which would help ensure future development was consistent with a comprehensive plan for the area.
Establish a master plan for the entire project area to ensure that the project is efficient and business-friendly, accommodating the next-generation of logistics buildings.	Meets Objective. The alternative would develop a smaller amount of logistics warehousing compared to the proposed project, but it would still be master planned, most likely under a specific plan.

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Table 6.T: Comparison of the Environmentally Superior Alternative to the Project Objectives

Project Objectives	Degree to Which Alternative 1 Satisfies the Project Objectives
Provide a major logistics center to accommodate a portion of the ever-expanding trade volumes at the Ports of Los Angeles and Long Beach.	Not to the Same Degree as the Proposed Project. The alternative would allow 28 MSF of logistics warehousing vs. 40.6 MSF for the proposed project.
Create a project that will provide a balanced approach to the City's fiscal viability, economic expansion, and environmental integrity.	Not to the Same Degree as the Proposed Project. The alternative would not provide nearly as much new warehouse capacity to form a regional port-oriented logistics center compared to the proposed project.
Provide the infrastructure improvements required to meet project needs in an efficient and cost-effective manner.	Not to the Same Degree as the Proposed Project. The alternative would produce 30% less employment than under the proposed project, and would also provide less property tax revenue and be able to pay for less public improvements and infrastructure compared to the proposed project.
Encourage new development consistent with regional and municipal service capabilities.	Not to the Same Degree as the Proposed Project. It is unclear if a substantially reduced logistics warehousing project could afford to provide the necessary infrastructure to support the planned development compared to the proposed project.
Significantly improve the jobs/housing balance and help reduce unemployment within the City.	Not to the Same Degree as the Proposed Project. This alternative would provide only 16,797 new employees compared to 24,000 from the proposed project (30% less).
Provide thousands of construction job opportunities during the project's buildout phase.	Not to the Same Degree as the Proposed Project. The alternative would not provide as much work for as many construction workers compared to the proposed project
Provide appropriate transitions or setbacks between on-site and off-site uses.	Meets Objective. A smaller logistics warehouse project may be able to provide equal or greater transitions and buffers from existing off-site residential uses compared to the proposed project.

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7.2 ACRONYMS AND ABBREVIATIONS

§	Section
§§	Subsection
°C	degrees Celsius
°F	degrees Fahrenheit
µg/m ³	Micrograms per cubic meter
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACC	Andrew Chang and Company
ACM	Asbestos-Containing Material
AF	acre-feet
AFRES	Air Force Reserve
AFV	Alternative Fuel Vehicle
AFY	acre feet per year
AICUZ	Air Installation Compatible Use Zone
ALUC	Airport Land Use Commission
ALUP	Airport Land Use Plan
amsl	above mean sea level
A-P Act	<i>Alquist-Priolo Earthquake Fault Zoning Act</i>
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
AST	Aboveground Storage Tank
Basin	South Coast Air Basin
BAU	Business As Usual
BDCP	Bay Delta Conservation Plan
BMP	Best Management Practice
BP	Business Park
BV&A	Bear Valley and Alessandro Development Company
BVIC	Bear Valley Irrigation Company
BVLWC	Bear Valley Land and Water Company

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CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalFire	California Department of Forestry and Fire Protection
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historic Resources
Caltrans	California Department of Transportation
CAPSSA	Criteria Area Plant Species Survey Area
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CASSA	Criteria Area Species Survey Area
CAT	California Climate Action Team
CBC	California Building Code
CBOC	California Burrowing Owl Consortium
CBSC	California Building Standards Commission
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFG	California Department of Fish and Game, former name of the California Department of Fish and Wildlife
CDFW	California Department of Fish and Wildlife, formerly known as the California Department of Fish and Game
CDGB	Community Development Block Grant
CDMG	California Department of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response Compensation Liability Act
CESA	California Endangered Species Act
CFCs	chlorofluorocarbons
CFR	Code of Federal Regulations

CFS	calls for service
cfs	cubic feet per second
CGP	Construction General Permit
CGS	California Geological Survey
CH ₄	Methane
CHP	California Highway Patrol
CIP	Capital Improvement Plan
CIWMB	California Integrated Waste Management Board
CLUP	Comprehensive Land Use Plan
CNDDDB	California Natural Diversity Data Base
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
COA	Coordinated Operations Agreement
CPD	(HUD Office of) Community Planning and Development
CPUC	California Public Utilities Commission
CRA	California Resource Agency
CRA	Cultural Resource Assessment
CSC	California Species of Concern
CUPA	Certified Unified Program Agency
CUWCC	California Urban Water Conservation Council
CVC	California Vehicle Code
CVP	Central Valley Project
CWA	(Federal) Clean Water Act
CWC	California Water Code
DAMP	Drainage Area Management Plan

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dB	decibel
dBA	decibel on the A-weighted scale
DBESP	Determination of a Biologically Equivalent or Superior Preservation
DCIA	Directly Connected Impervious Area
DE	Diesel Emissions
DEH	Department of Environmental Health
DHS	(California) Department of Health Services
DIF	Development Impact Fee
DMM	Demand Management Measure
DMP	Drainage Master Plan
DOC	(California) Department of Conservation
DOF	(California) Department of Finance
DTA	David Taussig & Associates, Inc.
DTSC	(California) Department of Toxic Substance Control
DWR	(California) Department of Water Resources
e.g.	<i>exempli grātiā</i> , for example
ECSD	Edgemont Community Services District
EDR	Environmental Data Resources
EIC	Eastern Information Center
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMWD	Eastern Municipal Water District
EPA	U.S. Environmental Protection Agency
EPAct	Energy Policy Act
ESA	Environmental Site Assessment
ESG	Emergency Solutions Grant
FAA	Federal Aviation Administration
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act

FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
ft	foot/feet
FTA	Federal Transit Administration
FTE	full-time equivalent
GCC	Global Climate Change
GHG	Greenhouse gas
GIS	Geographic Information Systems
GPA	General Plan Amendment
gpd	gallons per day
gpf	gallons per flush
GWP	Global Warming Potential
HANS	Habitat Evaluation and Acquisition Negotiation Strategy
HCD	(California) Department of Housing and Community Development
HCM	<i>Highway Capacity Manual</i>
HCP	Habitat Conservation Plan
HFCP	Highland Fairview Corporate Park
HHWE	Household Hazardous Waste Element
HI	Hazard Indices
HMB	Hazardous Materials Branch
HMSEP	Hazardous Materials Business Emergency Plan
HMMA	Hazardous Materials Management Act
HMMP	Habitat Mitigation and Monitoring Plan
HNL	Hourly Noise Level
HOME	HOME Investment Partnership
HOPWA	Housing Opportunities for Persons with AIDS
hp	horsepower
HRA	Health Risk Assessment
HSA	Hydrologic Subarea

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HSC	Health and Safety Code
HUD	Housing and Urban Development
HVAC	Heating, Ventilating, and Air Conditioning
HWCL	Hazardous Waste Control Law
Hz	hertz
i.e.	<i>id est</i> , that is
IMPLAN	Impact Analysis for Planning
IPCC	United Nations Intergovernmental Panel on Climate Change
IRP	Integrated Resources Plan
IS	Initial Study
ITE	Institute of Transportation Engineers
kV	kilovolt
LAFCO	Local Agency Formation Commission
LAPM	Los Angeles pocket mouse
LBP	Lead-Based Paint
LBRMP	Logistic Building Runoff Management Plan
lbs	pounds
LCC	Land Capability Classification
LD	Logistics Development
L_{dn}	day-night average noise
LE	Land Evaluation
LEED	Leadership in Energy and Environmental Design
L_{eq}	Equivalent continuous sound level (L_{eq})
LESA	(California) Land Evaluation and Site Assessment
LHMP	Local Hazard Mitigation Plan
LI	Light Industrial
LID	Low Impact Development
LL	Light Logistics
L_{max}	maximum noise level
LNG	Liquefied Natural Gas

LNG/CNG	liquefied natural gas/compressed natural gas
LOS	Level of Service
LS	Logistics Support
LSA	LSA Associates, Inc.
LST	Local Significance Threshold
MARB	March Air Reserve Base
MATES	Multiple Air Toxics Exposure Study
MBA	Michael Brandman Associates
MBTA	Migratory Bird Treaty Act
MC	Municipal Code
Metropolitan	Metropolitan Water District of Southern California
mgd	million gallons per day
MHSP	Moreno Highlands Specific Plan
MICR	maximum individual cancer risk
MIP	March Inland Port
MJPA	March Joint Powers Authority
mm/yr	millimeters per year
MMDP	Moreno Master Drainage Plan
MMRP	Mitigation Monitoring and Reporting Program
mmt	million metric tons
MOU	Memorandum of Understanding
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MPOA	Master Property Owners Association
MPT	Master Plan of Trails
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer Systems
MSHCP	(Western Riverside County) Multiple Species Habitat Conservation Plan
mt	metric tons

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mty	metric tons per year
MVEU	Moreno Valley Electric Utility
MVFD	Moreno Valley Fire Department
MVHS	Moreno Valley Historical Society
MVPD	Moreno Valley Police Department
MVRWRF	Moreno Valley Regional Water Reclamation Facility
MVUSD	Moreno Valley Unified School District
MW	megawatt
MWh	megawatt-hours
N ₂ O	nitrous oxide
NA	Native American
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAIOP	National Association of Industrial and Office Properties
National Register	National Register of Historic Places
NCCP	Natural Communities Conservation Plan
NDDB	Natural Diversity Data Base
NDFE	Nondisposal Facility Element
NEPA	National Environmental Policy Act
NEPSSA	Narrow Endemic Plant Species Survey Area
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NHTSA	Highway Traffic and Safety Administration
NMFS	National Marine Fisheries Service
NO ₂	Nitrogen Dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO _x	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System

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NRCP	Noise Reduction Compliance Plan
NRCS	Natural Resource Conservation Service
O ₃	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
OHWM	Ordinary High Water Mark
OMB	(White House) Office of Management and Budget
OPR	Office of Planning and Research
OS	Open Space
PAH	Polycyclic Aromatic Hydrocarbon
Pb	Lead
PCBs	polychlorinated biphenyls
PEA	Preliminary Environmental Assessment
PM ₁₀	Particulate Matter with a Diameter of 10 Microns or Less
PM _{2.5}	Particulate Matter with a Diameter of 2.5 Microns or Less
POTWs	Publicly Owned Treatment Works
POU	Publically Owned Utility
ppb	parts per billion
ppm	parts per million
PSB	Public Safety Building
PUC	Public Utilities Commission
PVC	Polyvinyl Chloride
PVCCSP	Perris Valley Commerce Center Specific Plan
PVSC	Perris Valley Storm Channel
PWC	Public Works Committee
PWQMP	Preliminary Water Quality Management Plan
PZ	Pressure Zone
q.v.	<i>quod vidē</i> , which see (presented elsewhere in the document)
RCA	Resource Conservation Agency
RCB	reinforced concrete box

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RCC	Riverside Community College
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCIP	Riverside County Integrated Project
RCIWMP	Riverside Countywide Integrated Waste Management Plan
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RCSD	Riverside County Sheriff's Department
RCTC	Riverside County Transportation Commission
RHNA	Regional Housing Needs Assessment
RivTAM	Riverside County Traffic Analysis Model
ROG	Reactive Organic Gas
RPR	(California) Rare Plant Ranking
RPS	Renewables Portfolio Standard
RPW	Relatively Permanent Water
RSHA	Regional System of Highways and Arterials
RTA	Riverside Transit Agency
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
SA	Site Assessment
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCGC	Southern California Gas Company
SCS	Sustainable Communities Strategy
SDG&E	San Diego Gas and Electric

SEDAB	Southeast Desert Air Basin
sf	square foot/feet
SF ₆	Sulfur Hexafluoride
SHMA	Seismic Hazards Mapping Act
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SJUSD	San Jacinto Unified School District
SJWA	San Jacinto Wildlife Area
SKR	Stephens' kangaroo rat
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SMARA	Surface Mining and Reclamation Act
SO ₂	Sulfur Dioxide
SO _x	Sulfur Oxides
SP	Service Population
SR-60	State Route 60
SRRE	Source Reduction and Recycling Element
SSURGO	Soil Survey Geographic
STC	Sound Transmission Class
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWQCB	State Water Quality Control Board
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TAF	thousand acre-feet
TASAS	Traffic Accident Surveillance and Analysis System
TCM	Transportation Control Measures
TCP	Traditional Cultural Place
TDM	Transportation Demand Management
TDS	Total Dissolved Solids

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TIA	Traffic Impact Analysis
TIS	Traffic Impact Study
TMDL	Total Maximum Daily Load
TNW	Traditional Navigable Water
tpy	tons per year
TRI	Toxics Release Inventory
TUMF	Transportation Uniform Mitigation Fee
UBC	Uniform Building Code
UC	University of California
UNFCCC	United Nations Framework Convention on Climate Change
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VAV	Variable Air Volume
VIA	Visual Impact Assessment
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VRP	Visibility-Reducing Particles
WDR	Wastewater Discharge Requirement
WLC	World Logistics Center
WLCSP	World Logistics Center Specific Plan
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WSA	Water Supply Assessment
WSP	Water Shortage Plan
ZOI	Zone of Influence

7.3 GLOSSARY OF GENERAL TERMS

Acre-Foot. An acre-foot is the quantity of volume of water that covers one acre to a depth of one foot; equal to 43,560 cubic feet or 325,851 gallons.

Aesthetics. The perception of artistic elements, or elements in the natural or human-made environment that are pleasing to the eye.

Air Quality Criteria. Air quality criteria are the levels of pollution and length of exposure at which adverse effects on health and welfare occur.

Air Quality Standards. Air quality standards are the prescribed level of pollutants in the outside air that cannot be exceeded legally during a specified time in a specified geographical area.

Ambient Noise. Ambient noise is the composite of noise from all sources near and far. The ambient noise level constitutes the normal or existing level of environmental noise at a given location.

Applicant. An applicant is a person who proposes to carry out a project that needs a lease, permit, license, certificate, or other entitlement, for use or financial assistance from one or more public agencies.

Arterial. An arterial is a major street carrying the traffic of local and collector streets to and from freeways and other major streets, with controlled intersections and generally providing direct access to non-residential properties.

Attainment. Attainment means that there is compliance with State and Federal ambient air quality standards within an air basin.

A-Weighted Decibel (dBA). The dB on the A-weighted scale is the sound level obtained by use of A-weighting. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.

California Environmental Quality Act (CEQA). Enacted in 1970, CEQA requires State and local agencies to estimate and evaluate the environmental implications of their actions. It aims to prevent environmental effects of the agency actions by requiring agencies, when feasible, to avoid or reduce the significant environmental impacts of their decisions. If a proposed activity has the potential for a significant adverse environmental impact, an environmental impact report (EIR) must be prepared and certified as to its adequacy before taking action on the proposed project (*California Public Resources Code* §§21000 et seq.)

Capacity. The maximum rate of flow at which vehicles can be reasonably expected to traverse a point or uniform segment of a lane or roadway during a specified time period under prevailing roadway, traffic, and control conditions.

Collector. Relatively low-speed, low-volume street that provides circulation within and between neighborhoods. Collectors usually serve short trips and are intended for collecting trips from local streets and distributing them to the arterial network.

Community Noise Equivalent Level (CNEL). A 24-hour energy equivalent level derived from a variety of single-noise events, with weighting factors of 5 and 10 dBA applied to the evening (7 p.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) periods, respectively, to allow for greater sensitivity to noise during these hours.

Congestion Management Plan (CMP). A mechanism employing growth management techniques, including traffic level of service requirements, standards for public transit, trip reduction programs involving transportation systems management and jobs/housing balance strategies, and capital improvement programming, for the purpose of controlling and/or reducing the cumulative regional traffic impacts of development.

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Cumulative Impact. As used in CEQA, the total impact resulting from the accumulated impacts of individual projects or programs over time.

Day-Night Average Level (L_{dn}). The average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of 10 decibels to sound levels in the night after 10 p.m. and before 7 a.m. (Note: CNEL and L_{dn} represent daily levels of noise exposure averaged on an annual or daily basis, while L_{eq} represents the equivalent energy noise exposure for a shorter time period, typically one hour.)

Decibel (dB). The decibel (dB) is the unit of level that denotes the ratio between two quantities that are proportional to power; the number of decibels is 10 times the logarithm (to the base 10) of this ratio.

Emission Standard. The maximum amount of pollutant legally permitted to be discharged from a single source, either mobile or stationary.

Environment. In CEQA, the environment are “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, mineral, flora, fauna, noise, and objects of historic or aesthetic significance.”

Environmental Impact Report (EIR). A report required pursuant to the California Environmental Quality Act that assesses all the environmental characteristics of an area, determines what effects or impacts will result if the area is altered or disturbed by a proposed action, and identifies alternatives or other measures to avoid or reduce those impacts.

Equivalent Energy Level (L_{eq}). L_{eq} is the sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over a given sample period. L_{eq} is typically computed over 1-hour, 8-hour, and 24-hour sample periods.

Feasible. To be feasible, according to CEQA, means to be capable of being accomplished in a successful manner within a reasonable time taking into account economic, environmental, social, and technological factors.

Findings. Findings required by CEQA are the conclusions made regarding the significance of a project in light of its environmental impacts. A Statement of Overriding Considerations does not obviate the need to make other required CEQA findings.

Floor Area Ratio (FAR). The FAR is the gross floor area permitted on a site divided by the total net area of the site, expressed in decimals to one or two places. For example, on a site with 10,000 net square feet of land area, a floor area ratio of 1.0 will allow a maximum of 10,000 gross square feet of building floor area to be built. On the same site, an FAR of 1.5 would allow 15,000 square feet of floor area; an FAR of 2.0 would allow 20,000 square feet; and an FAR of 0.5 would allow 5,000 square feet. Also commonly used in zoning, FARs typically are applied on a parcel-by-parcel basis as opposed to an average FAR for an entire land use or zoning district.

Floor Area, Gross. The sum of the horizontal areas of the several floors of a building measured from the exterior face of exterior walls, or from the centerline of a wall separating two buildings, but not including any space where the floor-to-ceiling height is less than six feet. Some cities exclude specific kinds of space (e.g., elevator shafts and parking decks) from the calculation of gross floor area.

Freeway. A freeway is a high-speed, high-capacity, limited-access road serving regional and countywide travel. Such roads are free of tolls, as contrasted with turnpikes or other toll roads. Freeways generally are used for long trips between major land use generators. Major streets cross at a different grade level.

Incorporation by Reference. “Incorporation by reference” is a CEQA term meaning reliance on a previous environmental document for some portion of the environmental analysis of a project. See *CEQA Guidelines* §15150.

Initial Study. An Initial Study is a preliminary CEQA analysis that can be prepared by a Lead Agency to determine whether an EIR or Negative Declaration must be prepared, and identifying the significant environmental effects to be analyzed in an EIR.

Land Use. Any land use is the determination by a governing authority of the use to which land within its jurisdiction may be put so as to promote the most advantageous development of the community.

Lead Agency. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project. The Lead Agency decides whether an EIR or Negative Declaration is required for a project, and causes the appropriate document to be prepared.

Level of Service (LOS). LOS is a qualitative measure describing operational conditions within a traffic stream and how motorists and/or passengers perceive them.

Maximum Noise Level (L_{max}). The maximum A-weighted sound levels measured on a sound level meter, during a designated time interval, using fast time averaging.

Mitigation Measure. A mitigation measure is a change in a project designed to avoid, minimize, rectify, reduce, or compensate for a significant environmental impact.

Mitigation Monitoring and Reporting Program (MMRP). When a lead agency adopts a mitigated negative declaration or an EIR, it must adopt a program of monitoring or reporting which will ensure that mitigation measures are implemented. (See CEQA Statute §21081.6(a) and *CEQA Guidelines* §§15091(d) and 15097.)

Noise. Noise is any sound that is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise annoying (unwanted sound).

Noise Contours. Noise contours are lines drawn about a noise source indicating equal levels of noise exposure.

Notice of Determination (NOD). An NOD is a brief notice filed with the State Clearinghouse to document project approval. The filing of the NOD starts the statute of limitations period. (See *CEQA Guidelines* §15373.)

Notice of Preparation (NOP). An NOP is a brief notice to notify the public, Responsible and Trustee Agencies that an EIR is being prepared for a project. The notice serves to solicit guidance from those agencies and the public about the scope and content of the environmental information to be included in the EIR. (See *CEQA Guidelines* §15375.)

Peak Hour. The hour of highest traffic volume on a given section of roadway between 7:00 a.m. and 9:00 a.m. or between 4:00 p.m. and 6:00 p.m.

Programmatic EIR. A programmatic EIR is an EIR that examines the impacts that would result from a conceptual plan or policy action envisioned by the lead agency, which is carried out at a more general level of analysis based upon the development information available. (See *CEQA Guidelines* §15161.)

Project. According to CEQA, a project is the whole of an action that has the potential to result in significant environmental change in the environment, directly or ultimately. (See *CEQA Guidelines* §15378.)

Project Description. A project description describes the basic characteristics of the project including location, need for the project, project objectives, technical and environmental characteristics, project size and design, project phasing and required permits. The level of detail provided in the project description varies according to the type of environmental document prepared.

Project EIR. A project EIR is an EIR that examines the impacts that would result from development of a specific project. (See *CEQA Guidelines* §15161.)

Public Hearing. A public hearing is a mechanism for providing the public an opportunity to comment on and present evidence relating to a proposed project and its Draft EIR.

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Responsible Agencies. According to CEQA, responsible agencies are all public agencies other than the Lead Agency that have discretionary approval power over the project. (See *CEQA Guidelines* §15381.)

Reviewing Agencies. Reviewing agencies are local, State, and Federal agencies with jurisdiction over the project area or resources potentially affected by the project. Cities and counties are also considered reviewing agencies.

Scoping Meeting. A scoping meeting is an optional meeting pursuant to CEQA in which the lead agency meets with members of the public or agency representatives after the Notice of Preparation has been issued to discuss environmental issues related to a project. Scoping sessions provide the opportunity to discuss environmental issues, project alternatives and potential mitigation measures that may warrant in-depth analysis in the environmental review process.

Sensitive Receptors. Sensitive receptors are people or institutions with people that are particularly susceptible to illness from environmental pollution, such as the elderly, very young children, people already weakened by illness (e.g., asthmatics), and persons engaged in strenuous exercise.

Significant Effect on the Environment. A significant effect on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (*CEQA Guidelines* §15382).

Thresholds of Significance. Thresholds of significance are criteria for each environmental issue area to assist with determinations of significance of project impacts. They are based on *CEQA Guidelines* Appendix G.

Trustee Agency. According to CEQA, a Trustee agency is a State agency that has jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. (See *CEQA Guidelines* §15386.)

Volume (Transportation). The volume of traffic is the total number of vehicles that pass over a given point or section of a roadway during a given time interval. Volumes may be expressed in terms of annual, daily, hourly, or sub-hourly periods.

Wastewater. Wastewater is water carrying dissolved or suspended solids from homes, farms, businesses, and industries. The wastewater treatment process includes any process that modifies characteristics of the wastewater, usually for the purpose of meeting effluent standards.

Zoning. Regulation by zone districts of the height, use, and area of structures, the use of land, and the density of population and intensity of allowable uses.

7.4 GLOSSARY OF PROJECT-SPECIFIC DEFINITIONS

The following definitions are excerpts from Section 3.4, *Project Description*.

Annexation Area: This term refers to an 85-acre parcel located adjacent to Gilman Springs Road that is to be annexed into the City of Moreno Valley. The parcel is already within the City's adopted Sphere of Influence adopted on November 21, 1985.

CDFW Conservation Buffer Area: This term refers to a 910-acre parcel owned by the State of California as part of the San Jacinto Wildlife Area (SJWA). This land is within the City of Moreno Valley and is included in the approved Moreno Highlands Specific Plan. That plan designates this property for a broad mix of urban uses including suburban residential, schools, parks, and roads. This land was purchased by the State in 1991 to act as a buffer between the sensitive biological resources of the SJWA and the future urban development under the Moreno Highlands Specific Plan. This land has been actively farmed for many decades and most of it remains in active production. The southwestern portion contains areas of non-native grasslands, although aerial photographs show that

this area has been intermittently tilled over the last 80 years. This property is included in the General Plan Amendment and the Zone Change to replace the current urban land uses that are permitted and replace them with Open Space and Public Facility designations. This property is not within the proposed World Logistics Center Specific Plan. This Buffer Area is a large part of the “Other Project Areas” described herein.

General Plan Amendment: One of the proposed entitlements is a General Plan Amendment (GPA) that will permit the establishment of logistics land uses on the 3,714-acre property located east of Redlands and south of SR-60. The following General Plan Elements will be amended: Community Development; Circulation; Parks, Recreation, and Open Space; Safety; Conservation; and General Plan Goals and Objectives. The GPA will replace the current Moreno Highland Specific Plan/General Plan Designations with the following land use designations: (a) 2,610 acres for high cube logistics development; (b) 1,084 acres of Open Space; and (c) 20 acres for Public Facilities.

Moreno Highlands Specific Plan: This term refers to the currently approved Specific Plan that covers 3,038 acres of the project area. This Specific Plan permits the development of a master planned, mixed-use community consisting of up to 7,763 residential dwelling units and approximately 603 acres of business, retail, institutional, and other uses. This development will be replaced with the World Logistics Center Specific Plan and 1,104 acres of Open Space and Public Facilities uses.

Off-site Analysis Zone: This term refers to an approximately 1,000-foot wide zone adjacent to the south and east boundaries of the Specific Plan area that was studied by Michael Brandman Associates (MBA) as part of the assessment of potential impacts on biological resources. It covers approximately 1,637.5 acres.

Off-site Improvement Areas: Development under the Specific Plan will require construction of a number of offsite infrastructure improvements covering approximately 104 acres of land adjacent to the Specific Plan Site including, but not limited to the following facilities (see Figure 3.7):

- Debris Basins easterly of Gilman Springs Road;
- Water reservoirs and access roads located northeast, north, and west of the project site;
- SR-60 interchange improvements; and
- Roadway, water, sewer, drainage, and utility improvements extending north and west from the project.

Other Project Areas: The San Diego Gas & Electric Company (SDG&E) and the Southern California Gas Company (SCGC) own a total of 194 acres of land immediately south of the Specific Plan site. These properties are included in the proposed General Plan Amendment and the Zone Change to designate them for Open Space and Public Facilities uses. These designations are consistent with present uses. These properties are not within the proposed World Logistics Specific Plan. Approximately 174 acres of the land owned by SDG&E will be designated as Open Space. Nineteen acres of SDG&E land and one acre of SCGC land will be designated as Public Facilities.

Project Site or Project Area: This term refers to the entire 3,818-acre area covered by the EIR encompassed by: (a) the Specific Plan Area (2,610 acres); (b) the CDFW Conservation Buffer Area (910 acres); (c) the Public Facilities Lands area (194 acres); and (d) the Off-site Improvement Area on 104 acres.

Proposed Project or World Logistics Center Project: General term applied to all of the entitlements outlined above that are addressed in this EIR, including:

WLC Specific Plan	2,610 acres
General Plan Amendment.....	3,714 acres
Zone Change	3,714 acres
Tentative Parcel Map	1,539 acres
Annexation85 acres
Off-site improvements	104 acres

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Specific Plan Site: Approximately 2,610 acres of the project area are included in the proposed World Logistics Center (WLC) Specific Plan, located generally south of the SR-60 Freeway, east of Redlands Boulevard, west of Gilman Springs Road, and north of the San Jacinto Wildlife Area.

State Lands: Refers to lands owned by the State of California and includes the San Jacinto Wildlife Area (SJWA) located south of the Specific Plan Site, and the Lake Perris State Recreation Area (LPSRA) located southwesterly of the Specific Plan Site.

Tentative Parcel Map Area: A Tentative Parcel Map is being processed to subdivide 1,539 acres of the project for financing purposes only. This property is owned by the project applicant. Approval of the map will confer no development rights to the property.

WLC Specific Plan: The WLC Specific Plan proposes a master-planned logistics campus to include up to 40.4 million square feet of high-cube logistics warehousing, up to 200,000 square feet of light logistics uses, a site for logistics support uses (LS designation) and 74.3 acres of Open Space in the southwest corner of the site. The Specific Plan includes extensive development standards, design guidelines and review procedures for all development within the project.

World Logistics Center Project: The term refers to all related development and planning activities currently proposed by Highland Fairview in the Rancho Belago area of the eastern end of the City of Moreno Valley. The WLC property is generally located south of the State Route 60 freeway, east of Redlands Boulevard, west of Gilman Springs Road, and north of Mystic Lake and the San Jacinto Wildlife Area.

Zone Change: The project includes a Zone Change covering 3,714 acres which will designate 1,084 acres of land for Open Space (CDFW and SDG&E properties), 20 acres for Public Facilities (SDG&E, SCGC properties) and 2,610 acres for the World Logistics Center Specific Plan.

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